

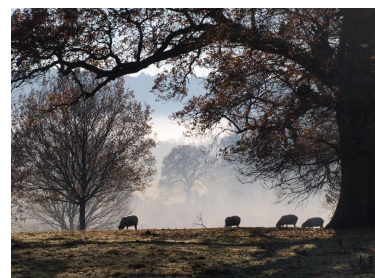
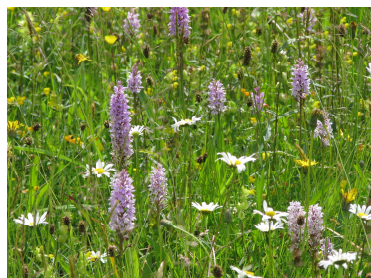
High Weald AONB Unit Commissioned Report

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A critique of Countryside Stewardship as an incentive scheme for the Weald, with recommendations for the future

Informing a High Weald Nature Recovery Area proposal



Paul Cobb CEnv MIEEM MBPR(Fert.), Farm Wildlife

March 2019



The High Weald: an outstanding medieval landscape

Our research and advice programme

Fuelling understanding of one of England's finest landscapes

The High Weald Area of Outstanding Natural Beauty is one of the best surviving medieval landscapes in northern Europe. The components of the High Weald's natural beauty that make it recognisably distinct are:

- **Geology, landform, water systems and climate:** deeply incised, ridged and faulted landform of clays and sandstone from which spring numerous gill streams.
- **Settlement:** dispersed historic settlements of farmsteads and hamlets and late medieval villages.
- **Routeways:** ancient routeways often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks.
- **Woodland:** a great extent of ancient woods, gills, and shaws in small holdings
- **Field and heath:** small, irregularly shaped and productive fields often bounded by – and forming a mosaic with – hedgerows and small woodlands.

The High Weald AONB Joint Advisory Committee (JAC) is a partnership established in 1991 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory **AONB Management Plan**.

The JAC is supported by a small, dedicated staff team, the **High Weald AONB Unit**, which develops understanding of the High Weald's key components - their history, development, distribution, special qualities, management, deterioration, damage and loss - to provide an evidence base for the AONB Management Plan and related policy, guidance and action.

This report has been produced to further that understanding and aims to help everybody conserve and enhance **one of England's finest landscapes**.



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The views expressed in this report are those of the author(s) and do not necessarily reflect those of the High Weald AONB Partnership.



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Summary

- The High Weald is well placed to benefit from future government investment in it as a ‘public good’, but there are many issues for land managers around maintaining grassland for conservation purposes, and more support is needed.
- This study reviews types of grassland in the High Weald and their management, together with the many background factors and issues that influence grassland managers, some of which are particularly pertinent to the Weald.
- The costs of and returns from grassland management are examined, together with the major sources of income for managers, and current sources of help and advice.
- The results of a wide ranging survey are presented, with the views and experiences of grassland managers, advisers and practitioners on how well grassland management in the High Weald has been served by Stewardship schemes and how they anticipate the future ‘ELM’ scheme working.
- The study reviews the evolution of Stewardship schemes, critiques the current Countryside Stewardship scheme, and shows how moving toward ELM creates opportunities for supporting grassland management in the High Weald that delivers multiple ecosystem services.
- Eight recommendations are put forward to allow ELM to build on the best aspects and achievements of previous Stewardship, while offering the greatest flexibility to Wealden land managers of all types to provide productive grassland systems with high biodiversity and other values.

1. Introduction

This study is part of a larger proposal for a High Weald Nature Recovery Area (Grassland) that will include grassland recovery case studies and provide recommendations on knowledge exchange, targeting, restoration mechanisms, grassland land management plans and measuring outcomes.

The High Weald AONB is a known refuge for species-rich grassland. There is scope to increase this resource, and the High Weald is well placed to benefit from future government investment in it as a ‘public good’. It is recognised, however, that there are many types of grassland managed in many different ways, many issues for land managers around maintaining grassland for conservation purposes, and that more support is needed.

1.1 Study aims

The aims of this study are:

- To critique current Countryside Stewardship options and specifications as they apply to grassland management in the AONB, and have followed the approach of previous agri-environment schemes
- To propose an approach for grassland management in the new ‘Environmental Land Management’ (ELM) scheme that recognises the new thinking that ELM itself is seeking in engaging with land managers

This approach includes options and specifications designed to feed in to a ‘grassland management plan template’, and to incentivise and guide a broad range of land owners and managers to improve the wildlife value of their grasslands and who are likely to take up the ELM scheme.

1.2 Nature Recovery Network

The Nature Recovery Network (NRN) project aims to build the mechanism for a nature recovery network that will achieve bigger, better and more joined up species-rich grasslands. It has a focus on the High Weald AONB, which is located at the heart of the South East between the North and the South Downs. Among the aims of the NRN is one of preparing landowners and farmers for different financial delivery tools, such as developer contributions and [new] agri-environment payments.

2. Grasslands in the High Weald

Unimproved, species-rich grasslands are less than 3% of all grasslands in the High Weald AONB, and its rarest and most threatened habitat. They are not concentrated in one area, but scattered across the High Weald; jewels in a medieval landscape. Many of these grasslands are designated as Sites of Special Scientific Interest (SSSI) or as local wildlife sites. Recent surveys have identified significant amounts of non-designated, species-rich grassland – up to 40% of all grassland in the AONB. While less recognised, the non-designated grassland offers huge potential for enhancement, creating links between and buffering the unimproved grassland.

2.1 Types of grassland

The AONB website has information aimed at managers of grassland in the High Weald, under the ‘wildflower meadow management’ tab, in the Land Managers Pack (LMP) under ‘meadow grassland’, and in the Weald Meadows Initiative (WMI) under ‘wildflower grasslands in the Weald’. All these sources define types of grassland to be found in the High Weald, and provide excellent guidance and information. However there is no common terminology, and the terms ‘wildflower meadow’, ‘meadow grassland’ and ‘wildflower grassland’ are used freely. This is potentially confusing to managers of what may be valuable grassland, but may not identify their own grassland as in any way a meadow or as having many wildflowers. This study therefore proposes definitions of grassland based on the types adopted for the land managers’ questionnaire (qv), which seeks to capture all types including temporary and improved grassland;

- Ryegrass or short-term ley (grazed or cut)
- Herbal or multi-species ley (grazed or cut)
- Traditional meadow (mainly cut for hay)
- Traditional pasture (mainly grazed)
- Rough grassland (tall grasses, little or not managed, +/- scrub)
- Wet grassland (regularly waterlogged or flooded)
- Heathland (grassland, small shrubs such as heather and gorse, +/- trees)
- Wood pasture (large trees, grazed grass, often old parkland)
- Horse or other eg llama paddock
- Large lawn or garden
- Amenity, recreation or school ground
- Churchyard
- Land by railway or highway
- Other grassland

Further basic information such as soil type and acidity qualifies the type(s) of grassland set out above. Defining the grassland according to its species richness should be a next step, with clear criteria for evaluation; this study has adopted those used in the Countryside Stewardship guidance for species poor improved, semi-improved, and species rich. The final overlay of information should be that of how the grassland is managed, by grazing or cutting, or both or not at all.

See Appendix 1, and the descriptions of grassland types below (adapted from High Weald Land Managers Pack) (NB these are the current Countryside Stewardship eligible grasslands only from the list above).

2.2 Ryegrass or short-term ley, grazed or cut

What is it?

Short-term ley grassland is sown for agricultural or recreational purposes and may be in place for 5 years or less. It normally has a low number of species, often dominated by (cultivars of) ryegrass and (where grazed) white clover, with the grass species dominant. Fertilisers or high levels of nutrients are often but not always applied, eg where white clover is encouraged. These inputs allow a high yield of grass to be taken, in grazing or from hay, or more commonly from silage.

What benefits does it have for wildlife?

Few, although if left ungrazed after a last cut of silage or hay and allowed to set seed it can benefit birds as a winter seed source. Wide uncut field margins also provide a food source and shelter for wildlife.

How should it be managed or enhanced?

Leave some areas eg field corners to set seed if possible. Leave wide field margins uncut and fence off temporarily while grazing during the summer months if possible, or if the field is cut, graze the margins with the aftermath. If margins are permanently fenced, some rotational cutting (cutting every two to three years in rotation) may be necessary to prevent the encroachment of scrub and bramble.

What should be avoided?

Application of high levels of nutrients at risky periods or on high risk ground, and/or when they will not be taken up by grass growth.

2.3 Herbal or multi-species ley, grazed or cut

What is it?

A herbal ley is a complex seed mixture of grasses, legumes and herbs such as sainfoin, birdsfoot trefoil, chicory and plantain, which bring a range of benefits to forage, livestock health and soil fertility. Herbal leys can often include a mixture of up to 17 species, and are maintained for up to seven years.

What benefits does it have for wildlife?

Traditionally used to build soil fertility and structure in an arable rotation, herbal leys bring significant benefits not only to soil health, but also to the health and diet of livestock and the wider environment. The diversity of the mixtures includes species attractive to pollinators and also ensures a longer flowering season. Certain species included in the mixtures have an anthelmintic property, which creates less reliance on artificial wormers, and the high legume content reduces the need for expensive artificial nitrogen.

How should it be managed or enhanced?

Choice of species to sow depends on the aims of the ley, its location and soil type, but all mixes should be diverse and therefore more 'enhanced' in comparison to ryegrass based leys. Can be used as part of a 'mob grazing' strategy, in traditional grazing systems, and for silage.

What should be avoided?

Overgrazing leading to bare soil / soil compaction and run-off.

2.4 Traditional meadow (mainly cut for hay)

What is it?

Traditional hay meadow management involves cutting in late July after most of the finer-leaved grasses and wildflowers have set seed and then grazing the re-growth from September until the soil becomes too wet, usually in November or December. Species-rich meadows are characterised by a colourful mix of finer grasses and wildflowers and are now a rare habitat.

What benefits does it have for wildlife?

Managing meadows in this way allows annual wildflower plants to flower and set seed, some wildflower perennials to flower and provides some capacity for invertebrates to breed and over-winter and some birds to nest and feed. Bumblebees and butterflies will benefit from leaving uncut

flower margins, large patches or corners each year, although on larger sites uncut margins should be rotated annually to prevent invasion by rank grass growth.

How should it be managed or enhanced?

Sites also managed with stock need grazing to remove grass regrowth after cutting, and possibly also early in the year. With no stock, cutting has to mimic this process, with one early and one late cut. No fertilizers should be used if the sward is semi-improved or species rich, but a traditional regime often includes a light application of well-rotted organic manure in the autumn every three years or so. It is worth soil sampling prior to any application of manure.

What should be avoided?

All cuttings should be removed on non-grazed sites to prevent smothering of wildflower seedlings and to prevent nutrient build up, which can encourage competitive species.

2.5 Traditional pasture (mainly grazed)

What is it?

Traditional pasture management involves grazing lightly in the spring and summer by sheep or cattle; this allows any wildflowers to set seed and to provide a diversity of vegetation structure. Like meadows, species-rich pastures are uncommon and usually found where agricultural improvement has not been possible eg on very poor acid, or light or stony soils, or steep slopes.

What benefits does it have for wildlife?

Traditional pasture management is particularly beneficial to the breeding and over-wintering of invertebrates. It also supports the nesting and feeding of some bird species. Lighter, later and/or less frequent grazing will benefit invertebrates more, while heavier grazing in autumn/winter can benefit plant diversity more.

How should it be managed or enhanced?

A recommended general regime would be to apply light or no grazing from April to mid-July, with hard grazing after this period to the end of December. Species-poor swards can be enhanced through the introduction of wildflower seed, if the sward can be opened up to allow this.

What should be avoided?

Overgrazing creates bare ground, which is easily colonised by aggressive weed species and undergrazing leads to the dominance of coarse grasses, bracken, bramble and scrub. If the sward is semi-improved or species rich, fertilisers should not be used as the effect of grazing means that nutrients are being recycled.

2.6 Rough grassland

What is it?

Rough grassland is characterised by the dominance of tall grasses and other coarse vegetation such as nettle, thistle, dock and hogweed, and being little or not managed. It can include fallow or set-aside developed on arable land. It may have an element of scrub and tree natural regeneration; scrub is normally a sign of undergrazing, but can be extremely valuable for wildlife. Clumps of scrubby growth become denser over the years to form young woodland. Small areas of rough grassland can also be left around the edge of traditional meadow and pasture fields.

What benefits does it have for wildlife?

As well as the value of any scrub, rough grassland is extremely valuable for invertebrates, small mammals and birds, and will provide hunting ground for raptors such as barn owl. It can be found in combination with other grassland types such as wet, heath, wood pasture, in which case values are multiplied.

How should it be managed or enhanced?

Cattle grazing, using Sussex and other hardy breeds, or cutting are both appropriate to maintain rough grassland. As opposed to annual cutting of long grass, rough grassland can be cut in late summer in every second or third year on rotation, and then just enough to prevent the encroachment of scrub. A minimum cutting height of around 11cm (4 inches) will allow for vole runs to persist and so help to support barn owl and other predators. Some areas can be cut shorter and more frequently to provide a more diverse habitat which will benefit birds, invertebrates and other wildlife as well as favouring the flowering and seeding of annual and perennial wildflowers.

What should be avoided?

Sudden drastic changes in management or structure, eg prolonged heavy grazing, large-scale scrub clearance, unless a site is in danger of becoming woodland. Avoid any use of fire to clear rough grass and standing scrub. Fertilisers should not be used.

2.7 Wet grassland

What is it?

Often found in a valley bottom and close to a river, but can be found anywhere where the High Weald's abundant springs come to the surface or there is poor drainage. Grassland may not appear marshy during the summer, but with high rainfall in the winter, conditions may become wet underfoot, and standing water may sometimes be seen.

What benefits does it have for wildlife?

Wet grassland areas can be extremely valuable for wildlife, and some unusual wetland plants such as sneezewort and spearwort may occur. They add greatly to the diversity of plants and invertebrates and, if large enough, also birds. Low intensity grazing and raised water levels, particularly in spring, will benefit breeding waders in large open landscapes. May also signify the site of an historic water meadow.

How should it be managed or enhanced?

Cattle grazing using traditional breeds are appropriate for wet grassland management and light poaching in the winter can open up some areas of sward to help maintain a diversity of structure and habitat to benefit a range of wildlife.

What should be avoided?

Sudden drastic changes in management eg prolonged heavy grazing, large-scale ditch clearance or drainage. Colonisation by natural regeneration especially willows which will dry out the ground and overshadow plants. Fertilisers should not be used, and run-off from surrounding land should be avoided through eg the use of buffer strips.

2.8 Heathland

What is it?

Heathland develops on poor soils on sandy ridges, the majority on the highest ridge – the Weald Forest Ridge - from Horsham in the west to Tunbridge Wells in the east. It is characterised by small shrubs such as heather and gorse as well as areas of larger trees and shrubs, in which (usually acid) grassland may be a minor element. While the main area by far in the High Weald AONB is the Ashdown Forest, some heathland exists as smaller pockets within woodland settings on farms and holdings.

What benefits does it have for wildlife?

Heathlands are a mosaic of diverse habitats and home to a number of rare species; birds like the nightjar whose strange churring song can be heard at dusk, and plants like the blue marsh gentian, which is found in wet mires. It is extremely valuable for a wide range of invertebrates.

How should it be managed or enhanced?

Historically, natural regeneration of woodland was controlled as grazing animals spread and nibbled away at the young trees and shrubs, and commoners harvested gorse for firewood and bracken for animal bedding. On sites where grazing is impracticable, cutting is the only alternative; ideally, cuttings should be removed.

What should be avoided?

Lack of management; without grazing or cutting, trees and shrubs gradually turn heathland to woodland. Bracken and gorse, which used to be kept under control through commoners harvesting, grow tall, overwhelming the unique heathland plants. Invasive plants such as rhododendron. Avoid any use of fire to clear bracken and standing scrub. Fertilisers should not be used.

2.9 Wood pasture

What is it?

Wood pasture is characterised by the presence of large old (often veteran) trees, over grass; often it may be old parkland, or woodland cleared to leaved scattered individual trees.

What benefits does it have for wildlife?

Veteran trees support a wide range of species, including plants, insects, lichens, fungi and microorganisms, many of which only survive in the specialised conditions and are therefore amongst our rarest. The grassland may be secondary to this in value, especially if under shade from the trees, however where grazed it may have the same values as traditional pasture, and if undisturbed, animal dung provides an additional habitat. May also be of historical/archaeological interest.

How should it be managed or enhanced?

Graze and/or cut to maintain a closely grazed sward interspersed with taller tussocks, and retain all mature and veteran standing trees and all standing and fallen deadwood. Protect any 'parkland' features, such as fencing, historic structures, lakes and ponds.

What should be avoided?

Damage to existing trees from livestock and wild animals, and any damage to dead trees or timber. If the sward is semi-improved or species rich, fertilisers should not be used as the effect of grazing means that nutrients are being recycled.

2.10 Horse or other paddock

What is it?

Horse paddocks typically have close-cropped grassland, often with bare earth. Scrub and trees that remain often have no low growth. Problem species such as nettles, docks and ragwort can sometimes proliferate, and give the appearance of a very degraded landscape if the land is not sympathetically managed.

What benefits does it have for wildlife?

Few where close-grazed, although if other livestock are not available, maintaining an area with horses at suitable stocking rates can be a valuable grassland management tool. Herb species in a sward will have wildlife value (see below). Permanent sub-division of fields has an impact on the landscape so semi-permanent or temporary fencing should be used; wooden or dark green/brown plastic posts and electric rope or dark green, brown or black electric tape.

How should it be managed or enhanced?

Horses do best on less productive swards than in standard agricultural systems. Some herb species are desirable and species favoured by horses include birdsfoot trefoil, black medick, yellow trefoil, ribwort plantain and yarrow. Grazing with other stock such as cattle is an effective way of reducing the amount of grass intake for horses, especially during the peak growing seasons. This can be done either by allowing the cattle to graze the land before horses or by grazing them together.

What should be avoided?

Care needs to be taken to avoid poaching round feeding areas and entrances especially in winter and wet weather. Any facilities should maintain the highest environmental standards with regard to storage of manure and drainage. Horses browse trees, and newly planted and specimen or veteran trees will need to be protected by putting netting or guards around them.

2.11 Methods of grassland management

Grassland is a dynamic habitat and without regular management intervention will undergo ecological succession, a process that can be quite rapid in comparison to say a pond or woodland. While non-intervention is an option for a land manager, some management is usually the preferred option. Stewardship scheme prescriptions normally require some form of management, however limited, during the period of the agreement. Grassland managers who do not have access to stock and/or machinery may be able to access these through RAMSAK, an agricultural machinery and land management services ring operating in Kent and Sussex.

The main methods of grassland management of grazing, cutting, or a combination of both are set out below (adapted from High Weald Land Managers Pack).

2.11.1 Grazing

Grazing is often the most effective choice of management for maintaining species richness and promoting the 'traditional' look of grassland in the surrounding landscape. It can be very useful in restoring neglected areas or to conserve a site that just requires minimal grazing such as one with

archaeological features. Grazing should remove the year's grass growth to ensure the area is maintained.

Factors to be considered when opting for grazing management:

Aims of grazing: grazing restricted by conservation and landscape objectives may not be as productive, but payments such as Stewardship can compensate for this and make it financially viable.

Whether grazing is suitable for the site: if a site has traditionally been managed for a long period by cutting, changing to grazing could cause many species to be lost and have an adverse effect on the landscape.

Size of area: larger sites need larger numbers of livestock, whereas it may be awkward to find a small number of animals for small sites. Larger sites can be split and grazed in rotation. □

Time of grazing: requires knowing the characteristics, flora and fauna of the grassland, to determine the best grazing and resting periods (+/- cutting).

Stock type and availability: each type of grazing animal has different effects on the vegetation, while grassland managers without stock will need to bring these in via a grazier or other arrangement.

Sheep

- Create a very short sward
- Eat low grassy plants but will avoid taller plants
- Need less water than cattle
- Not useful for restoration as prefer shorter grassy plants than taller plants

Cattle

- Create areas of tall and short vegetation
- Eat low lying and taller plants
- Need a lot of drinking water
- Can be used for restoration

Goats

- Create a varied sward
- Prefer scrub and taller vegetation than short grassy plants
- Difficult to contain on site
- Very useful for restoration as eat small trees and scrub plants including gorse and hawthorn

Horses

- Harder to manage than sheep or cattle
- Not appropriate for restoration as do not eat plants such as ragwort
- Dung is dropped in one area leading to weeds, and can cause bare patches leading to weeds such as thistle and dock
- Consider grazing horses with sheep or cattle to create a varied sward
- Create areas of tall vegetation and bare patches, can eliminate some plants and leave others

Grazing periods and intensity

The aim of grazing is to remove the grass growth of the year. Light grazing over a longer period is typically favoured in Stewardship schemes, rather than heavy grazing over a shorter period, as it ensures that flowers can set seed and that certain species will not be eliminated by hard grazing. Light grazing for at least 10 weeks a year between April and November is recommended, aiming for a mixture of sward heights by the end of the summer. This will encourage a range of species of

flora and fauna in the grassland and also enhance its landscape. The preferred time of year for grazing varies with each site, depending on local conditions and type of vegetation present, and professional advice is recommended.

For wildlife and landscape conservation objectives, the site can be grazed briefly in spring allowing vegetation to grow, flower and seed during the summer, and followed with further grazing in September and October or beyond as needed to get the sward tight going into winter. If the site is managed solely for livestock production, it may need to be grazed all year round. If this is the case a lighter stocking density should be considered to ensure the site does not become over-grazed and lose its landscape value, but under-grazing should be avoided. As a very general rule, conservation grasslands should be grazed at a rate of 1 cattle or 4 sheep per hectare/year but this will vary considerably and further advice will be needed.

2.11.2 Cutting

Cutting or mowing can be a very effective way of managing grassland, although it results in the instant removal of a habitat. Cutting can be preferable where it has been the traditional form of management in the past and the vegetation and wildlife communities have formed around this regular management.

Cutting for hay is often the traditional method of management to produce winter feed for livestock. Cutting 2 – 3 times a year for silage, usually between May to September, has become a more popular choice due to a greater economic return. Cutting for hay or silage will influence the frequency of cutting of grassland with both having different effects on the conservation and landscape value of the grassland.

Cutting is often useful in an area that is impossible to fence for livestock. From a nature conservation point of view, cutting for hay is the preferred option. It is better for biodiversity than cutting for silage as there is only a single cut a year. This allows vegetation to flower and set seed, compared to three intensive cuts a year for silage.

Hay should be cut in summer late enough in the year to allow plants to flower and set seed. Cutting after mid July is often stipulated in Stewardship schemes, but should otherwise be timed to balance productivity with conservation objectives. If production of winter feed for livestock is not important then cutting in late August or early September is possible. Even with hay cuts an occasional spring cut may reduce the dominance of certain species such as false oat grass. Leaving a wide uncut area around the edges of the field acts as a refuge for beneficial insects to repopulate the grassland as the grass grows again and is an important safe corridor for mammals.

Types of machinery

The type of machinery to use will be influenced by the size of the site, local topography, financial constraints and access to machinery. Tractor mounted machinery can be used to cut the grass and collect the cuttings which is often the most suitable option for larger sites. Flails can be used although these can be very damaging to mammal and reptile populations and can make collection of cuttings difficult. A strimmer or pedestrian motor scythe is suitable for small areas or ones that are difficult to access by larger machinery. Both are available from tool hire shops.

In all cases, cuttings should be removed from a site to prevent the area becoming rich in nutrients. If not, the cuttings decay overtime and allow dominant types of vegetation such as bramble and nettles to develop and engulf the site. This can reduce the landscape value of the site as well as reducing the number of species of flora and fauna found on the site. Removal by machinery is best for larger sites whereas smaller sites can be raked manually.

Cuttings are ideally used as a feed for livestock or taken away and composted, the latter often being the best option on smaller sites. However, disposal on site may be needed. If this is necessary, a composting area of low biodiversity value and where nutrient accumulation will not cause problems can be used. Although cuttings will decay very quickly, vigorous species such as nettles, docks and thistles will readily establish and may cause problems.



Sheep grazing Stewardship scheme grassland in the High Weald



Species rich grassland created by local native wildflower seeding

3. Background and issues

Farmers in general, and livestock keepers in particular, complain that over the years they have had to put up with more and more impediments to running a business; be that in the form of ‘red tape’, or general ‘hassle’. While some of that difficulty is due to the bringing in line of a previously lightly regulated industry, some of it is due to social changes and changing attitudes, as well as in farming’s place in the countryside. After nearly three decades, even the Stewardship schemes that are under examination in this report are part of that background. Any examination of the schemes, and any proposals for a future scheme, has to be clear about what grassland managers (unless for some reason of scale or type they fall outside what is described in the following section) contend with; and by extension, ask the question; what if anything could the future ELM scheme do to help?

3.1 Grassland management - regulatory background

A manager of grassland operating on all but a very small scale is subject to the same regulations as any other farmer or land manager. Many of these regulations are specific to keeping animals and managing their impacts and waste products, and some are the ‘cross compliance’ that is required if taking Basic Payment Scheme (BPS) or Stewardship funding. Some apply equally to the landowner and to a grazier¹.

3.1.1 Keeping and moving stock

A farmer or grazier must have a county parish holding (CPH) number to keep livestock as part of a business. A farmer/grazier must have a CPH number to comply with the rules on recording and reporting livestock movements. All movements of cattle, sheep and goats must be recorded and reported to the appropriate agency. On-farm movement records must be kept to record all movements on and off the holding, births, deaths and replacement tags. Requirements on moving and recording animals, and any ‘standstill’ restrictions, will vary depending on e.g. whether stock will mix with someone else’s or arrive from a different CPH. Clearly such restrictions restrict the ability of land managers or graziers to rapidly put animals on land other than their own, and take them off again. This impacts especially in the High Weald, with many small holdings and fields, and some of the options for getting small areas grazed like ‘flying flocks’ and finishing stock on one holding that were raised on another will come up against movement recording requirements. It can be made somewhat easier for anyone nearby by use of a ‘temporary land association’ (TLA). A TLA associates a permanent CPH with land or a building within 10 miles of that CPH’s main livestock handling area. The land or building will be treated as part of the permanent CPH it is associated to. This means there is no need to record or report livestock movements between that land and the rest of a CPH, and standstill restrictions do not apply when moving livestock between that land and the rest of a CPH. A TLA lasts up to 1 year but can be renewed before it ends.

3.1.2 TB restrictions

Kent, Surrey and West Sussex are in low-risk areas for TB and require only 4-year testing of cattle. East Sussex is in an ‘edge’ area requiring annual testing. All cattle keepers on an annual testing interval must also comply with statutory pre-movement testing requirements, unless an exemption applies to the animal being moved or the type of movement. Cattle keepers in a low-risk area who moved cattle from the annual testing areas must also comply with post-movement testing

¹ Including for the purposes of this report people taking grass for silage, hay or haylage

requirements. Even if TB does not spread further, it is a restrictive issue for livestock keepers in Sussex especially, and interviewees identified it as such.

3.1.3 Stewardship agreements

Stewardship agreements have their own ‘general management requirements’, as well as some specific ones eg not cutting more than 50% of all hedges on or bordering agreement land in a calendar year, and limiting grazing activity to avoid overgrazing and undergrazing across the whole grazed area of the holding. The same cross compliance applies to Stewardship agreements as to BPS, namely:

- Maintaining land in Good Agricultural and Environmental Condition (GAEC) by meeting a range of standards that relate to water, the protection of soil and carbon stock, and landscape features; and
- Meeting a range of Statutory Management Requirements (SMRs) relating to the environment, public and plant health, animal health and welfare, and livestock identification and tracing.

The highest levels of cross compliance inspection failure are repeatedly for livestock identification and movement regulations, as well as for Nitrate Vulnerable Zone (NVZ) requirements (see below).

Although not part of Stewardship as such, the Environmental Impact (Agriculture) (England) (No. 2) Regulations 2006 (as amended) apply to projects that aim to increase the productivity of uncultivated land or semi-natural areas, and which (normally) cover two hectares or more in area (total project area not field size). Natural England considers land to be uncultivated if it has not been subject to physical or chemical cultivation in the last 15 years. This would restrict the ability of a land manager in the High Weald to improve grassland that has been in long-term permanent grassland such as in a Stewardship scheme.

3.1.4 Water, soil and air

In England and Wales about 60% of nitrates and 25% of phosphates in water come from agricultural activities. In addition, agriculture is responsible for about 80% of total ammonia emissions, of which 75% come from livestock farms – which clearly implicates grassland, even managed at low intensity. Storage of fertiliser and manures is covered by a range of legislation, aimed at minimising point source and diffuse pollution. About 58% of England and Wales is designated NVZ, and large areas of the High Weald AONB are covered, including the Rother and other valleys in the east, south of Heathfield, south of Crowborough, west of Tunbridge Wells, south of East Grinstead, south and east of Horsham and west of Cuckfield. This imposes rules on livestock farmers on storage and spreading of manures and fertilisers, including closed periods and a requirement to make calculations eg of manure produced and map areas on the farm where spreading can take place.

‘Low-intensity farms’ (where at least 80% of the land is grassland, no more than 100kg of nitrogen per hectare per year is applied as organic manure (including any nitrogen in manure deposited on the field by livestock), no more than 90kg of nitrogen per hectare per year is spread as manufactured fertiliser, and no organic manure is brought onto the holding, do not have to keep a record of any actual applications of manufactured fertiliser and organic manure in each field. However, they must have recorded information to show that they meet the criteria for low-intensity farms and still plan their nitrogen use by keeping a fertilisation plan. When calculating their fertiliser applications, they must not include any area of the holding where they do not spread any fertiliser or work the soil (for example, on rough grazing areas). While this may exempt many High Weald farms from the most onerous NVZ regulations, they will still need to keep some records.

In addition, the new (2018) Rules for Water apply to everyone cultivating land and/or keeping livestock even if not in an NVZ. These require precautions to be taken against soil erosion and runoff from eg farm tracks and gateways, poaching by livestock and the application of manures and fertiliser. Failure to comply risks loss of BPS payment and even prosecution. Finally, government proposals for a Clean Air Strategy published in January 2019, which would require eg slurries to be spread using low-emission spreading equipment and all slurry stores and manure heaps to be covered, will potentially impact on High Weald grassland farms with livestock.

It is debatable whether every High Weald grassland manager with livestock or taking in manures (especially if they believe they are operating on a low-intensity scale), is following the NVZ regulations, or has grasped the significance of the Rules for Water and the implications of the Clean Air Strategy. With explanation and advice, they are not overwhelming obstacles, but they make it more difficult to operate in this landscape and add to time and costs for what are already small, under resourced farms.

3.2 Grassland management – other issues

Along with the regulatory background, the issues flagged up below are part of the background against which grassland managers in the High Weald AONB operate. Many are beyond the scope of any future ELM scheme to tackle, although a local scheme could support and promote livestock farming and its role in the maintaining the landscape of the High Weald AONB.

3.2.1 Land ownership and age structure

‘Traditional’ farmers are ageing; nationally, 40% of landholders are aged over 65, and the median age is 60 (Farm Structure Survey 2016). At the same time, for the first time ‘lifestyle’ buyers, investors and wealthy individuals bought more than half the farmland sold in England in 2018 (Strutt & Parker, reported in Farmers Weekly 1.2.19). With its smaller livestock farms and location in the affluent southeast, the High Weald AONB is likely to exceed both those indices, creating a polarised pattern of small traditional farms with ageing owners at one extreme, and lifestyle holdings at the other, with more modern agribusinesses between the two, looking to take on land both from older farmers as they retire and from those with funds but no farming capability. A one size fits all Stewardship model has tried to cater for all these types of landholding, as well as fit around the complexities of BPS and who claims what funding. An ELM scheme could be more comprehensive in having different types of arrangement and payment for different models of ownership and management, both less complex and convoluted for the farmer/landholder, and taking in more non-farmers, tenants, small landowners and graziers who often struggle to find an entry into present schemes.

3.2.2 Land holding and management

The High Weald AONB has multiple models of land holding and management. Where the owner is not also managing the land, grassland can be held or offered via a number of legal mechanisms (in addition to purely informal agreements). Land managers and graziers in the High Weald AONB can use many different arrangements, including as part of a tenancy, herbage let, annual grazing licence, farm business tenancy (FBT), and agistments (taking in livestock for a payment to the grazier). Graziers on species rich grasslands may also do this free of charge, or they may pay, or be paid. The grassland managers interviewed in the High Weald AONB are clearly willing to undertake management of the sites under their control. Equally, the role of graziers is hugely important, as a

site without its own stock or equipment delivering a Stewardship scheme agreement is entirely dependent on them. At the same time, the difficulty of finding reliable graziers with long-term commitment was mentioned by several owners, while those looking to take on land commented on the poor state of some sites eg regarding fencing, water and grass quality. Lack of on-site equipment such as livestock handling facilities, pens and hurdles may not be an obstacle to a grazier, as it can be brought in. In any initiative attempting to link owners and graziers, selecting the right people and matching them with each other is crucial. Everyone has different ideas about how land should be managed, and with site owners ranging from traditional landowners to non-farming and recent purchasers, personalities play a big part and need careful management.

3.2.3 Public and welfare issues

Well-used public access in the High Weald AONB creates a number of issues, chief of which is potential dog attacks on livestock, which was raised as an issue by several interviewees, but also livestock being let out through gates or fences. Trespass was mentioned as a nuisance by one interviewee farming alongside a busy walking /cycling route. On the other hand, there have been incidents of footpath walkers killed by cattle, for example at Forest Row in October 2018. Access also means that the welfare of stock is in the public eye. Poor quality grassland will not support livestock without supplementary feeding, which may not be possible on Stewardship scheme land, and winter grazing on the soils of the High Weald can create wet, muddy conditions. Unless grassland managers have land they can move animals to, apart from the poor image created, they may be contravening welfare, soil and water regulations. Stock types that thrive on poorer grassland land such as Sussex cattle may have an advantage over 'commercial' breeds. The balance between managing grassland purely for conservation and managing it for a market return, and the role of Stewardship scheme support, are clearly critical in landholders' motivations, as well as being linked to livestock condition and welfare. There is also a link to how many stock can be grazed on a site at any time, and whether managers have the ability to move stock on and off land in Stewardship schemes when conditions dictate or allow, regardless of the prescription in their agreement (see further 4.4. below).

3.3 Grassland management - costs and returns

The landscape of the High Weald AONB with its difficult soils and small, irregular fields makes returns from grassland management (including livestock keeping) borderline. Land managers are often dealing with sites with less productive grass, and while difficult vehicle access was not considered an obstacle by most interviewees, other obstacles such as damage to fences from deer and falling branches were. Where land is in a Stewardship scheme, requirements of the agreement as to when hay can be cut or stock can be grazed and in what numbers is a further restriction on any 'commercial' management approach.

3.3.1 Livestock, meat and markets

The returns on extensive grassland enterprises are low, and on a purely commercial analysis it is hard to justify managing them without support from more profitable enterprises on the farm, a non-farming source of income, or Stewardship scheme funding (or any/all of these). Key issues for this study and grasslands in the High Weald are also the underpinning role of BPS payments on land, and what happens to a landholder/grazier relationship when BPS is phased out.

The prospect of a Brexit with no deal, or one in which markets for cheaper food imports are opened up, and/or current live export markets are subjected to high tariffs, does not create confidence in the sector. At the time of writing, in a no-deal Brexit, a temporary tariff regime would apply for up to 12 months; 87% of total imports to the UK by value would be eligible for tariff free access. Tariffs would still apply to 13% of goods imported into the UK, and this includes a mixture of tariffs and quotas on beef, lamb, pork, poultry and some dairy to support farmers and producers who have historically been protected through high EU tariffs.

The great majority of grassland managers will be using livestock, either their own or a grazier's, and some interviewees see an opportunity for promoting locally produced (and grass-fed), locally sold meat; the grasslands of the High Weald AONB could have instant appeal in this. However, there are other pressures on the sector at the moment. Questions have been raised about red meat regarding human health and the environment (EAT-Lancet Commission report, January 2019). A current trend for a vegan lifestyle, which at an extreme level refuses all animal 'exploitation' or products, is linked for some with an activism that seeks to 'name and shame' eg dairy farmers by publishing names and locations, and urging direct action.

3.3.2 Restocking the High Weald

Conditions in the High Weald favour grass production and livestock enterprises account for 65% of all farms and underpin the farming economy. However the area's elevation, small fields, low grade soils and poor drainage means the average farm size is 36ha compared to the national average of 81ha; and the average farm income of £16,000 p.a. is less than that of any other farm type and comparable to that for grazing livestock in a Less Favoured Area. Between 2000 and 2013 the High Weald saw a reduction in livestock numbers of 27%. Against this background, the study *Restocking the Weald: Securing the future of livestock farming in the High Weald's working landscape* (June 2013) looked at encouraging farmers to reverse the decline in livestock numbers, create space for young and aspiring farmers, and help secure the working landscape of the High Weald. The study also pointed out that in seeking to encourage young/new farmers to set up in the Weald, there is no direct help from Stewardship schemes, other schemes actually fund diversification leading to a loss of yards and buildings, and there is pressure from residential purchasers on the same resource.

A follow up *Feasibility study and Proposal for Implementation* (December 2015) modelled income from a 40 ha Wealden sheep enterprise under three scenarios – annual grazing licence, FBT, and a 'transition' with a young farmer taking on more land via both. In the words of the report, the modelling 'shows how low the profitability of the livestock sector can be – or perhaps more accurately what scale an enterprise needs to be in order to be profitable. Without the benefit of stewardship payments and with an eroded Pillar 1 [BPS] payment coupled with increasing rents, it will be increasingly difficult for an enterprise to be profitable without concessionary arrangements between landowner and grazier.'

3.3.3 Grazing Animals Project, Nix pocketbook

The Grazing Animals Project (GAP) was formed in 1997 as an advice network for grazing on conservation sites, and by 2005 supported a network of 1000 members. While much of the information it produced is now over 10 years old, GAP has done some useful work looking at enterprise costs and gross margins for livestock and grassland management, including producing ready reckoners itemising costs as a guide for anyone setting up an enterprise.

The *John Nix Pocketbook for farm management* (2019 edition) has some useful costs including 'conservation costs' such as establishing a wildflower meadow, and the prices of various grass mixes including those designed for Stewardship schemes, as well as standard enterprise costs such

as for suckler beef. Some costs from the Nix Pocketbook are reproduced in Appendix 2, as well as some capital costs from a local farm equipment supplier relevant to livestock management. A simplified list of grassland enterprise costs from which a gross or net margin might be worked out in setting up to manage grassland by grazing and/or cutting is also included as a very rough guide.

3.3.4 Grassland managers' costs

It must be stressed that other than for a standard commercial enterprise such as beef production on improved grassland, costing grassland management is a tenuous exercise, and those interviewed struggled to find anything that would fit a classic enterprise costs model. None of those interviewed are managing their grassland as a stand-alone enterprise. Even for the land-based businesses, it is wrapped up in the management of the rest of a farm, and where these are also graziers, part of a wider area of land they graze or cut on their own holding and for others. For non-farmers with other sources of income clearly the grassland does not have to make a commercial return. Arrangements and expectations are tremendously varied, and the only common factor between the large-scale commercial farmer and the near to retirement and 'hobby' farmer was the conviction that without Stewardship scheme support, managing their conservation grassland would not have been possible.

Returns from grazing other than through Stewardship schemes or BPS (see 3.4 below) are a combination of the let of grazing or grass cutting, and sales of meat and livestock. Native rare breeds are supported by Stewardship, and meat from these may find a niche market opportunity in an area such as the High Weald AONB. One interviewee has a pedigree Sussex herd from which sales of breeding stock adds value.

Some example costs and returns from interviewees;

- Summer grazing selling at £15/ac, £30/ac, and winter keep at 30 p/head
- Grass rented in at £20/ac
- Hay crop selling at £120/ac
- On 73 ha CSHT income value £26K/year against £15K/year costs
- On 429 ha CSHT income covers costs but only with Native Breeds Supplement
- On 542 ha HLS income value £30K/year against £25K/year costs
- On 15 ha HLS income value £3K/year covering costs but not time input
- On 135 ha HLS income value £24K/year
- On 19 ha HLS income value £4K/year
- On 49 ha BPS income £10K/year, no Stewardship scheme income

3.4 Grassland management – funding sources

Government policy makers, and government agencies such as Natural England and Environment Agency, have to strike a balance between the 'sticks' set out in 3.1 above, and the 'carrots' described below. Stewardship schemes have been the mainstay of grassland management for wildlife conservation for nearly 30 years, paying for the positive management of habitats and features. BPS and its predecessors in direct farm support have also put a 'floor' in the economy of grassland and other farmland management, but the whole CAP support system is heavily criticised in some quarters for creating a 'dependency culture' that at best discourages innovation and new entrants to the industry, and at worst is simply paying people not to farm. The future system set out in the 2108 Agriculture Bill, is a deliberate move away from a perceived 'money for nothing' approach.

3.4.1 Environmental Stewardship

The 'Higher Level Scheme' (HLS) component of the Environmental Stewardship agri-environment scheme that ran until 2014, engaged land owners and managers in 10-year contracts to provide a range of land management activity, backed with both annual revenue, and one-off capital, payments. Conservation of important and species-rich grassland habitats figures prominently in the HLS, and cutting and/or livestock grazing is the default management tool for this.

The 'Entry Level Scheme' (ELS) component of Environmental Stewardship pays a flat rate of £30/ha, provided enough 'points' are gained for managing certain features, including 'low input' and 'very low input' grassland. While the relative ease for grassland-based holdings to use the low input option without much environmental gain has been criticised, it allowed them to qualify for Stewardship scheme payments, and the £30/ha underpinning any other work in HLS has been an economic boost that will be missed in Countryside Stewardship. However, the 'Restocking the Weald' study points to a lower uptake of ES in the High Weald at c. 50% of the agricultural area as against 67% nationally (in 2013). Among reasons for this it cites the generally much lower take up of Stewardship schemes among small farms, and the perceived low value of permanent grassland for biodiversity.

22 of the land managers responding to the survey or interviewed have current ELS/HLS agreements. The replacement scheme for HLS is Countryside Stewardship (CS), and early conversion from HLS to CS is only allowed in exceptional cases, and in the final year of an agreement. In December 2018 Defra agreed potential extensions to expiring 2019 HLS agreements on a rolling one-year basis up to four years, subject to their being assessed for suitability by NE. Four of the eight land managers interviewed have taken this up, so remain locked in HLS for a further year, without being able to make any changes to their scheme, but with the guaranteed continued income.

3.4.2 Countryside Stewardship

CS has replaced HLS and will be the main agri-environment funding source for the next 2-6 years. Like HLS, it has revenue and capital payments across a wide range of habitat types aimed at getting optimum management. CS has been criticised for its complexity and overemphasis on record keeping and evidence, and this as much as the continuation of payments (including ELS £30/ha) has been a justification for those extending ELS/HLS schemes, as well arguably for NE officers to encourage extensions. Nonetheless CS will remain the main incentive for grassland management in the High Weald AONB for up to 5 more years, until the ELM scheme comes in. 17 of the land managers responding to the survey or interviewed have entered into CS agreements.

3.4.3 Basic Payment Scheme

All holdings above 5 ha are eligible for direct payments under the Basic Payment Scheme (BPS). This support (predicted value for 2018 £231.70/ha) was created under the Common Agricultural Policy (CAP) and is based on holding 'entitlements' to land in order to claim. To claim under BPS land must be available for agricultural production. Fenced off areas or areas of dense scrub in grassland can therefore be declared ineligible. All of the land managers interviewed for this report are in receipt of BPS.

In 2019 and 2020 the amounts paid under BPS will be largely the same as previously. Between 2021 and 2027 there will be progressive reductions in direct payments until BPS is phased out in 2027 (the 'transition period'). The phasing will be more rapid for larger holdings. □The transition payments will also be 'delinked' so that claimants will not need to continue farming to claim, with an option to take a lump sum, and leave farming altogether. While this could be an attractive option

for grassland farmers in the High Weald AONB, it could have financial implications eg for inheritance tax so is not without risk.

In addition to various forms of letting land set out in 3.2.2 above, BPS creates another layer of complexity in that either the landholder or a grazier can claim the payment, depending on what arrangement is reached between the parties. While graziers are often happy not to get involved in the claim process, for some this, plus managing and claiming Stewardship scheme income, is a preferred route and a source of income. Also, in certain situations land registered to one business and used to claim BPS may also be included in a CS application submitted by another business. This is known as ‘dual use’, and there are rules around eligibility and management control of the land that need to be followed, with a written record of the rights and responsibilities of each party.

3.4.4 Sussex Lund

Sussex Lund is a grants programme aimed at community groups, schools, churches, parish councils, charities, businesses, farmers and landowners and supporting small-scale, practical projects that improve the landscape of the High Weald AONB. It supports projects in the wider countryside as well as those in hamlets, villages and towns, such as churchyards, school grounds, recreation areas and roadside verges. One-off grants of between £500 and £10,000 are available for eg habitat improvement projects, which could include developing more species-rich grassland.

3.5 Grassland management – sources of advice and information

The High Weald AONB website provides a major source of information under the ‘wildflower meadow management’ tab, in the Land Managers Pack (LMP) under ‘meadow grassland’, and in the Weald Meadows Initiative (WMI) under ‘wildflower grasslands in the Weald’. Other sources of advice and information were listed in the grassland managers survey questionnaire as below:

- Land agent e.g. CLM, Batcheller Monkhouse, Cluttons, Strutt and Parker
- Other agents e.g. FWAG
- Industry bodies such as AHDB (Agriculture & Horticulture Development board)
- Local group such as Small Farm Training Group (SFTG)
- Natural England
- High Weald AONB Partnership, Weald Meadows Initiative
- Conservation organisation e.g. Sussex or Kent Wildlife Trust, Buglife
- Websites / online

Results from the survey questionnaire and interviews show the very wide range of sources that are and have been used; see section 4 below.

3.6 Discussion

None of the regulatory background in 3.1 above is an absolute obstacle to grassland management as such, or to joining an agri-environment scheme, but it makes taking on a Stewardship agreement less attractive if it adds to the burden of paperwork for little return. Equally, none of the issues in 3.2 is an absolute obstacle to grassland management, but when added to the burden of regulation, and the costs and returns set out in 3.3, for some they may be a deciding factor in whether to carry on.

While many holdings in the High Weald AONB have been funded under Stewardship schemes, and some by other initiatives, it would be hard to find a holding, whether farming or non-farming, small or large, that has not been supported by BPS. One interviewee set their £10K/year BPS income against the £5K/year they pay for farm insurance alone, and said ‘it would be hopeless without it’. Few farmer claimants would see it as ‘money for nothing’, rather as essential support for an

industry pegged down by poor returns and beset in other ways. BPS has certainly been fundamental in farm business economies (statistics for the period 2014/5 to 2106/17, from ICAEW Farming & Rural Business Community Newsletter December 2018);

- Average Farm Business Income (FBI) was £37,000
- Direct payments [BPS] comprised 61% of FBI (83% for tenants)
- In the northeast direct payments were 98% of FBI
- 42% of farms would have made a loss before direct payments

The decline in overall support, and the switch from BPS to public money for public goods and other support, is likely to be in the order of one third, from c. £3 billion to less than £2 billion (source; Defra/Andersons 2018). The option of taking a lump sum and leaving farming will be attractive for many in the High Weald at (beyond) retirement age and on small grassland / livestock farms. Many who see it giving a chance for new entrants have applauded the option, but on holdings in the High Weald with high residential values, and farmers nearby looking to take on more land, this is questionable without active incentives. These farms often have infrastructure funded by generous grants in the 1970ies now decaying and prohibitively expensive to replace.

A key question for the industry and this report is the degree to which future support can - or should - be accessed by all those now getting BPS that remain in farming. In this, the High Weald AONB is in a better position than say East Anglia, but perhaps less so than the northeast, where the 'uplands' label attracts special consideration. Yet the High Weald shares many characteristics with upland areas of smaller, grassland and livestock based enterprises on difficult land, in landscapes of high historic and cultural significance, valued by the many who visit them. Not every holding now getting BPS will get support under ELM, and those that do will compete for a smaller pot overall. Support through ELM for grassland managers needs to be clearly justified in the context of a special landscape with unique characteristics.

Finally, Defra sees advice and other support and information as central to the working of ELM, and its role is also flagged up by the NRN (see Section 6 below). Expert, ongoing advice is seen as vital by many grassland managers responding to the questionnaire and interviewed. The number of individuals in and around the High Weald AONB with a working knowledge of farming and farm businesses, able to get to grips with the notions of public goods and ecosystem services, and skilled to assess and advise on semi improved and species rich grasslands, must be small. Urgent thought needs to be given to where ELM advisers will come from, the skills they need and how they should be trained and accredited.



Steep land and small fields in the High Weald



Dogs and livestock warning sign on footpath

4. Consultation

A wide range of people was interviewed for the study including landholders, advisers, a land agent and a policy adviser, by online survey, and individual interview face to face or by telephone.

4.1 Questionnaire survey

A 'survey monkey' questionnaire of 10 questions was made available online and promoted through the High Weald Unit to over 150 grassland owners. The questionnaire is reproduced at Appendix 3. The questionnaire sought to gather information and views from owners and managers of grassland in the High Weald, by asking about types of grassland, how it is managed and by who, how it is paid for, if managed in a Stewardship scheme, views on the future ELM scheme, confidence in grassland identification, knowledge of soil health, and obstacles to grassland management.

The survey had 63 responses, from owners of over 2900 ha of land (7 did not specify an area). The majority of responses (44) were from managers of grassland in the East Sussex High Weald, with four from the High Weald in Kent and three from the West Sussex High Weald. Six responses were from managers of grassland outside the High Weald in Kent and East Sussex, amounting to over 230 ha. 10% of respondents did not specify the location of their grassland. The greatest number of respondents (38%) are managing areas from 4 to 40 ha, and only 5% are managing area of 200 ha and over, although 13% did not specify a land area.

4.1.1 Grassland types

Traditional pasture and traditional meadow is the most common type of grassland on respondents' holdings, accounting for almost half (47%) of the grassland types mentioned. The remainder is mainly a mix of wet and rough grassland, herbal or multi-species ley (8%), large lawns or gardens, wood pasture, and rye grass / short-term ley (6%). Less common, and accounting for just 12% of the grassland types mentioned, are horse or other paddocks, heathland or 'other' (defined by respondents as grassland planted with native trees, orchard, banks, pond area and poor grass that is not species rich).

4.1.2 Management practices, and sources of information

Traditional cutting for hay is the most common management practice at 21%, followed by topping with cuttings not removed at 14%. Only 7% of respondents cut for silage. More respondents graze with their own stock (20%) than use a grazier or other arrangement, while more get their grass cut by a contractor (14%) than do it themselves. Other cutting includes 'cut and raked by volunteers participating in churchyard management' and 'topped very occasionally', and other grazing includes 'aftermath grazed Nov to Jan' and 'sheep keep'. Although not included in the figures as a management response, one respondent also mentioned that they 'can't get it grazed'. Asked about changes to their grassland, 73% of those responding said they would like to or planned to improve its wildlife value, 5% said increase production, and 17% said both.

The High Weald AONB, Natural England, websites/online and conservation organisations account for over 2/3 of respondents' sources of advice for grassland management. However there is a wide range of sources, and other sources of advice mentioned (10% of responses) include none, or own

experience and self-education, booklets, experienced staff, contractors, seed dealers, the Soil Association, PFLA, and grazing or wildflower groups.

4.1.3 Paying for management, and other grassland values

Over $\frac{1}{3}$ of respondents' grassland is paid for by a combination of farm sales and public funding. 10% is self-supporting through farm sales, while 15% is supported by public money. Other methods of payment for grassland management mentioned by respondents include diversification, farm attraction, PCCs, rental, estate management company, and a free grazing agreement with grazier.

A wide range of other services of value from grassland was given by respondents, with almost $\frac{2}{3}$ citing beauty and landscape, access to nature and health and well-being. Fewer were likely to cite services such as carbon storage, water purification and flood alleviation. Amongst the 11 mentions of other services of value being provided by their grassland, almost $\frac{2}{3}$ were 'wildlife habitats and biodiversity' or 'insects and pollinators'. Additional services mentioned were tourism, educational talks and seed harvesting for meadow regeneration.

4.1.4 Agri-environment schemes

Over $\frac{1}{4}$ (28%) of respondents have never had land in a Stewardship scheme. Most of those of those that have had land in a Stewardship scheme are now or have been in Environmental Stewardship or old Countryside Stewardship schemes, though 11% have expired ES schemes. Only 12% and 6% respectively are in Countryside Stewardship MT or HT, although these are more recent schemes.

Looking ahead to ELM, asked if an agri-environment scheme with payment by results and the land manager in control would appeal, 86% responded positively, although a wide range of comments was made including:

- Unless a scheme helps farm income, land managers may not want to join or fund the balance of costs
- Interest would depend on the prescriptions and how results are assessed
- The difficulty of assessing results
- Effects on results eg climate, weather and land managers' knowledge, interest and incentives
- Belief that land manager knowledge is limited in some areas, eg wildflowers
- Finding the CSS too restrictive to adjust land use to meet needs as a visitor attraction
- Lack of understanding of schemes and being put off by bureaucracy
- Schemes being complicated and not viable
- Land area managed being too small to make joining worthwhile

Asked if the ELM approach where the land manager develops their own plan would appeal, again an overwhelming majority of 92% said yes, with some comments;

- Finding previous schemes effective as they incentivised farmers and landowners for doing less or making changes at no cost, rather than having to pay for new work, e.g. leaving hedges uncut or changing timing of mowing headlands
- Interest would depend on the manager and whether they are prepared to develop their own plans
- Interest would depend on the adviser
- Interest would depend on the terms of the ELM
- A preference for an approach where an advisor is not required so the land agents aren't the main profiteers

Asked what help would be most useful in developing an ELM land management plan, all types except paper-based management information and a regular visit from an adviser were cited by 47-51 of those responding, the other two types getting 37 and 42 citations respectively. However, paper based management information was seen as very important by the majority of those citing this type of help, and indeed 5 of the 7 types of help were cited as very important, and one as important, by the highest number of respondents for each type, the exception being a regular visit from an adviser. Twice as many respondents thought a one-off visit from an adviser was very important or important than a regular visit from an adviser, and web-based management information was cited as the most important out of any type of help.

Only one other response was added: 'assistance with identifying and form filling for relevant schemes'. Another suggested online chat with an advisor as useful. It was also commented that the adviser should not have to be a land agent paid for by the farmer.

4.1.5 Identifying species-rich grassland, and soil knowledge

Asked how confident they would be at assessing their own grassland using the definitions of semi-improved and species-rich given in Countryside Stewardship, over half said they would be very confident or quite confident. Only 11% said they would be not at all confident, contrasting with the results of the individual interviews below. A parallel question asked how knowledgeable respondents felt they were in general about soil health; this time, over half said they were not very knowledgeable or not knowledgeable at all. Only 3% said they were very knowledgeable.

36% of respondents had obtained recent information on soil health. Reasons given as to why respondents had not include assuming the soil is OK; that it was analysed a few years ago; not knowing what to do; being worried about the cost; not being knowledgeable enough; it not being a priority; not feeling the need to; not being sure of the benefits; and not having thought about it. Of those who had obtained recent information, a slight majority (46% against 42%) had got someone else to take samples and send them to a laboratory, rather than taking the samples themselves and sending. A small number (4%) had taken samples and analysed them themselves.

4.1.6 Obstacles to grassland management

Among a wide range of obstacles to grassland management, poor returns from keeping livestock was seen as a major obstacle by the greatest number of respondents, along with lack of funds to pay for an adviser. This, and lack of species-rich grassland management experience, got the greatest number of responses overall citing them as obstacles. Public access issues also featured highly as a major obstacle, while this, lack of suitable machinery and difficulties finding a useful adviser were in the top six seen as obstacles by the greatest number of respondents. Issues such as fencing, water, vehicle access and livestock movements figured less highly (the latter in contrast to individual interviewees), although a high proportion of those that cited these ranked them as major obstacles. Being unable to get a grazier, or a contractor to take a hay cut, were less likely to be seen as major obstacles.

This question raised a large number of comments on other important obstacles faced in managing grassland:

Nine comments were made on costs and subsidies:

- Lack of engagement or contribution to capital costs by Natural England

- Poor subsidies for managing land for long-term benefit of the land to keep it available for food production longer term
- Return on management costs
- Income from farm to justify any expenditure
- Lack of finance to maintain fences, cut hedges and overhanging trees
- Cost of native species seed mixes for improving the variety and quality of grasses and wildflowers
- Cost of hiring help to implement in the field
- Capital to invest into establishment of no-till grassland
- Contractor costs

Time needed to implement environmentally beneficial strategies, and public access and dogs not keeping to paths being a disincentive to conservation work, each attracted 2 comments.

Other important obstacles faced were listed as:

- Contractor knowledge of good management practices
- Public attitudes (burial grounds) ie tidiness versus wild flower meadows and wildlife
- Needing to proceed with the majority view where the estate is run by a management company with residents as members
- "Environment Agency's irrelevant phosphate calculations being applied to my grazing system "
- "The difficulties are starting to defeat me and I am sad to see the meadow in decline"
- Old age
- Steep land with heavy impermeable subsoil, poor drainage on lower slopes

Other comments made in association with this question:

- For Churchyards and cemeteries (370+ in Sussex), these are areas with open access for the public, covering many acres of countryside so a perfect opportunity to promote wildlife conservation. Education, and changing attitudes to wildlife conservation are key. Grazing is rarely possible although sheep are unhelpfully used as 'mowing machines' in summer months in two Sussex churchyards
- Only a few acres with 12 sheep does not seem applicable
- Grassland management needs a reason - livestock are the obvious and historic answer. Pressures from fashionable vegan and vegetarian lobbies are hurting consumer confidence - produce from pasture fed historic landscapes needs to have a special endorsement - perhaps country-wide, and completely unlike the infuriatingly irrelevant and misunderstood red tractor scheme. Could all the AONBs and national parks do a joint marketing "marque" venture?
- Created forest of some 400 species-rich trees with Forestry Commission 1993, 1.5 ha, planted 150 approx. more, incl. 23 Black Poplars, restored 3 woods, added scrape, 535 m hedging
- Government grant schemes seem to me to be too complicated to make a claim
- Late-cut hay is less valued and local contractors only use big round bales
- The best way to get more species would be for you to source and provide the seeding and planting. I don't have the resources or equipment
- We have been very fortunate to work with some brilliant advisers from local wildlife groups, government bodies and private consultants. Further funding to better the reach of these advisers through education of the public etc. would be money very well spent

4.2 Individual landholder interviews

Eight individual landholder grassland managers were interviewed for this report. They were asked the same 10 questions from the survey questionnaire, plus some additional questions specific to Stewardship schemes. Their holdings range in area from 15 to 1012 ha, and include non-farmers, modern multi-farm businesses, and traditional landowner estates. They are mainly owned land, with some rented. Some have their own stock, some use graziers, some both. Four are in HLS schemes, 2 are in CS, one has land in both, and one is not in any Stewardship scheme. The interview summaries are at Appendix 3a.

4.2.1 Interview results

Grassland types, management and income

The interviewees are managing a wide range of grassland types; the great majority have traditional meadow, pasture or both, and most have rough and wet grassland, although usually in small areas (this mirrors the types of grassland represented in the wider questionnaire survey). A minority have ryegrass or short-term leys and only one has herbal or multi-species leys. Some are planning to make their grass more species rich, and fewer to increase production – for some it is both, according to the kind of grassland they have. Hay made by a contractor is the majority cutting method, with some also cutting for silage and haylage. A slight majority have their own stock, and the grass is grazed about equally by cattle and sheep, and by horses for some. All the interviewees are supported by Stewardship scheme and BPS income; over half report a contribution from produce sales as well. All the interviewees believe their grass provides other services of value such as carbon storage, beauty and landscape.

Sources of advice and information

A wide range of sources is being used, with none dominating, although only one interviewee reports getting advice or information from a conservation organisation. Among specific sources, FWAG and WMI are mentioned several times. All sources of help are ranked mainly as important or very important. The most consistently highly ranked information seen as useful for development of an ELM plan is adviser help. Regular and one-off visits from an adviser are ranked about the same, as are paper and web based management information. Group visits to other grassland sites are seen as more important than training courses and workshops; where either ranked lower this tends to be due to the age of the interviewees.

Evaluating and monitoring

Half the interviewees are not at all confident at evaluating their grasslands using Countryside Stewardship definitions, and the same number see themselves as not knowledgeable at all about soil health. Half have obtained recent information on their soils (though in one case 4-5 years was seen as recent), and in all those cases samples were taken by someone else and sent to a lab.

Obstacles to grassland management

None of the interviewees sees lack of livestock management experience or enthusiasm as an obstacle. Only one reports not being able to get a grazier as an obstacle. Structural difficulties such as lack of machinery or overwintering land / facilities, fencing, water supply and vehicle access are mainly seen as less or not important obstacles. Public access issues such as dogs, and movement restrictions due to TB are regarded as important or very important obstacles in the great majority of cases (in the case of TB in Sussex, and for those with their own stock). Poor returns from livestock

keeping are cited as very important obstacles by half the interviewees; those giving any other view do not depend on the stock for an income. Half the interviewees do not see difficulty finding, or lack of funds to pay for, an adviser as important obstacles.

Views on Stewardship schemes, and ELM

The great majority of interviewees believe Stewardship schemes have covered the costs of managing their grassland very or quite well. Equally they believe Stewardship schemes have worked very or quite well in achieving the aims and outcome of managing their grassland. There is less belief that schemes have worked for grassland management in general in the High Weald, with half the interviewees giving a 'quite well' response. The great majority believe ELM could do better in the High Weald, and both ELM and the Land Management Plan approach appeal to them, although this is sometimes a qualified response, and some are not sure. Half the interviewees would support an ELM scheme that provided incentives to do more in grassland management than cover income foregone.

4.2.2 Interview dialogue

The individual interviews also provided an invaluable opportunity to query responses, and get a wide-ranging dialogue around points being raised. The comments below flag up key issues raised by interviewees on past Stewardship schemes, Countryside Stewardship, and how the future ELM scheme should position itself.

Stewardship scheme conflicts

There can be tensions in HLS schemes around different objectives. A grazier wants productivity and income, from their point of view a Stewardship site (even if fenced and watered) may be poor grass that stock don't do well on, while the owner takes the BPS and HLS money (for doing nothing, sometimes). A site owner delivering HLS wants the rules and dates to be stuck to, from their point of view they are offering cheap grazing subsidised by the scheme. If the owner is also the grazier, though HLS covers the costs, they would really have liked more flexibility around grazing and cutting dates (climate change not helping here), the chance to do more when an opportunity is there, and more productivity from HLS grassland than the scheme allows. It's about site micromanagement, giving the grassland manager more freedom to choose, and managing the land accordingly.

Perception of Countryside Stewardship

It's too complex to apply to, too prescriptive to operate, and you can't do more than the rules and the agreement allow. The payments are late, and the inspections are badly targeted, lengthy and onerous. When people started in Stewardship schemes they got a lot of help from a Natural England adviser, these advisers moved on and now people come and go, visit less often and they can lack experience as well.

Messages for ELM

This High Weald land is only good for grass, but grassland and livestock enterprises are marginal at best, so we'll have to do agri-environment - it's where the future money will be, and we could not have managed without it up to now. Or without BPS – the end of that will have a real impact. We think we've done a pretty good job in HLS and we'd like to carry on, too, so continuity is important and building on what we've done. But should ELM money go to owners who don't do anything?

We need in ELM:

- A locally adapted scheme that values the High Weald unique landscape - and the grass fed meat that it can produce
- Baseline information, so you can target your objectives and evolve your scheme as you observe changes over 5 years
- Monitoring, but this should not penalise you if not getting the right results immediately or you are inspected at the wrong time
- Ongoing, consistent, knowledgeable adviser input
- Payment for more than income foregone, and for going above and beyond – there could be a baseline establishment payment with additional payment for ongoing management
- Recognition of the role of productive grassland and the value of herb-rich, long-term leys in an agricultural system for their benefits to stock and wildlife
- Recognition of the woodland/ grassland mix in the High Weald and support for those managing both at the same time
- Good capital costs payments, especially for (renewing) infrastructure in farmyards that is needed for livestock management
- Support for collaboration; we already do this for some things eg machinery and it makes sense to work together at a landscape scale

4.3 Other interviews – advisers

Three people with experience of advising on Stewardship schemes were additionally interviewed for the study about their views on how the schemes have worked, and how the future ELM scheme might work;

Dawn Brickwood, Weald Meadows Partnership coordinator, has advised grassland owners and done surveys and support for entry to Stewardship schemes (mainly HLS), as well as supplying native wildflowers for sites through the Weald Native Origin Seed (WNOS) initiative.

Leo Hickish, partner with land agents Batcheller Monkhouse, has promoted Stewardship schemes including group applications, and applied for entry for grassland owners, as well as negotiating for clients on inspections, amendments and day to day issues such as stocking rates.

Ralph Hobbs, formerly with FWAG and Natural England and an environmental land charity trustee, has advised on Stewardship schemes and applied for entry for grassland owners, as well as giving ongoing advice on implementation and carrying out botanical surveys to go with applications.

Their responses are summarised below.

[A] How well Stewardship schemes have worked in covering the costs of managing grassland in the High Weald?

Quite to very well. Payment rates have not been bad, more a question of whether they are worth it for the burden of scheme administration. Annual payments have been good, capital payments can fall short for grassland creation/enhancement with small sites where more machinery and work is needed than covered by 100% payments, when these are based on Nix standard costs. Difficult to get all costs into one quote when payments based on getting 3 quotes. Needs more support for management of existing grassland, £250-£300/ha to reflect boundary support key to the management of good meadows.

[B] How well Stewardship schemes have worked in achieving the aims and outcomes of managing grassland in the High Weald?

Quite to very well. HLS has been very successful, and Stewardship schemes have worked quite well on the whole, especially for grassland recreation where there are visible results after a few years, and in encouraging more commercial grassland owners. Less successful for established grassland, and it needs time to see what results CSMT will have. Lack of ongoing advice is an issue, to keep people motivated and doing the right thing – it's possible to have an agreement and do nothing if people don't read it and are not picked up otherwise.

[C] Would interviewee support a future 'ELM' (Environmental Land Management) scheme approach if it provided incentives to do more to achieve eg a wider range of grassland types, more species rich grassland, or grassland with other values, rather than simply covering 'profit foregone' like previous schemes?

Yes. ELM should deliver but it needs to have agreed outcomes to aim for, strong enough to make a difference. No harm in a competitive scheme, but it needs discretion for the grassland manager to go over and above in delivery on the ground, and add value. Needs support for entrants, and specialist advice, plus monitoring of ongoing work via adviser and specialist to ensure success, with key milestones or time periods. Cluster farms could have better outcomes – someone takes the lead, advisor input, and the group shares machinery, stock and best practice. Payments for infrastructure and options for network grazing and machinery use.

[D] How well Stewardship schemes have worked for grassland management in general in the High Weald in interviewees' opinion?

Quite well. Stewardship schemes have got the right sort of management into land managers' heads and onto the ground, without them we would have lost a lot more grassland diversity. Needs retained advisers, with specialists. Linked training programmes, and monitoring. We have not learnt the lessons about administration; schemes need to get this, trust, and relationships right. Less bureaucracy is needed eg on inspections and penalties for minute areas; a more positive approach. Able to contact administrators and vary schemes.

[E] If interviewees think the future ELM scheme could work better for grassland management in general in the High Weald?

Yes, or don't know. The framework sounds good but we know very little detail. High Weald is not very different from uplands – needs a scheme with more support for livestock farming. A risk that it will be another bureaucratic nightmare. CS is far too off putting to most landowners now and there are too few younger incomers to take it up. Land managers need to be able to do the application themselves (maybe some help to do surveys) and understand what it means – they will have to deliver it. Needs more flexible prescriptions, advice available from the start and throughout. Monitoring should not be too ambitious, same number of species in a grassland but more flowering is good. Herbal leys with eg birdsfoot trefoil, red clover, have a value. If everyone has to do ELM more resources will be needed.

4.4. Other interviews – land managers

A fourth interview was held with **Fidelity Weston**, vice chair of the Pasture Fed Livestock Association (PFLA), and a grassland farmer who has had land in Stewardship schemes for restoration of wildflower grassland, and been organic certified since 2000.

1. How have your Stewardship schemes worked?

We have got more species in the meadows we manage [with cattle grazing], and dormouse using the hedges. We've learnt by doing it, we know what to do for the maximum environmental benefit and are confident we won't be damaging anything if we change this slightly. It needs a certain level of understanding to do this, but [in our situation] we'd love it if a future ELM scheme were less prescriptive. We've also been doing mob grazing² for 15 months and it has benefits in species diversity, soil structure, less N leaching, and even for hedges which get longer resting periods.

2. What is the PFLA trying to achieve that can help create diverse grassland?

PFLA is a forum looking at getting the most out of grassland, not just financially but to produce healthier meat in an environmentally friendly way, relying on natural grassland, often wildflower rich. We want to get more farmers to have productive grassland with wildlife value – not graze hard with set stocking and make a 'green desert'. Taking the pressure off grazing gives more wildflowers and better soil biology. If people see someone else do it they know it works, and it's fairly basic, it needs electric fencing and water troughs, it's not hugely expensive or hi-tech.

3. How could ELM support this?

It could have payment options for eg mob grazing, capital works for eg electric fencing, bringing in bales of hay from species rich meadows. Advisers and ecologists must be at the heart of any local scheme, it's crucial to help farmers know what they have (who pays for the advice, is it through the scheme?). This could be less tied to individual farms, with a collaborative approach, a group of farms with an adviser who makes yearly visits, group members could contribute. Groups could be advice hubs, with people passing on ideas and information, eligible for a farmer-to-farmer training payment. PFLA members have learnt together and decided to do it – this is more empowering than being told what to do all the time with no idea why you're doing it.

4. What about marketing produce, and getting new entrants?

There are 400 PFLA members and of these 70 are certified to use the 'Pasture for Life' logo, with their produce traceable back to the farm. We are trying to tie the marketing in to the management – so buying PFL means supporting environmental benefit. We are doing a 'route to market' project on marketing; in some places there is a demand for PFL produce but not enough suppliers. An incentive to be certified like Stewardship payments give for organic would speed this up, and there is a role for ELM to recognise accreditation like PFL and LEAF Marque. PFLA has a very young membership in comparison to many farmer bodies – they see it as a new way of farming, not just doing what their parents did. They tend to be smaller farms than average, and as low-input systems pasture fed grassland farms don't need a lot of investment, so have potential for new entrants.

A fifth interview was held with **John Marland**, who has a 65 ha farm in the High Weald AONB and also farms in Kent, has a wide experience of and consults on all types of crop and stock farming, and has put the High Weald farm into Countryside Stewardship in 2019 to revert it from arable to grassland.

² Rotating stock around tall mature swards and moving them on quickly to fresh areas so grazed areas are not poached and are rested a long time

Experience of Stewardship schemes before Countryside Stewardship?

'Old' Countryside Stewardship and ELS/HLS no problem. Guidance was clear – ELS/HLS forms seemed long-winded and complicated, but the scheme itself was not as complicated as it looked. Once the concept of 'profit foregone' was understood, delivering was not that difficult, provided you stayed within the tolerances of dates, distances and areas.

Aims for what was undertaken on the High Weald farm in CS?

To put a stable income stream into place if going into a volatile market post-Brexit, and lock into a scheme with a requirement to address water quality in the area, as well as meeting AONB objectives to restore meadow grassland in the High Weald. To achieve scheme targets, and get an income on land that was not that productive.

Experience of the Countryside Stewardship process?

Very similar to previous Stewardship schemes, but was very pleased to have had help with the application, the adviser filling in the forms with us as applicants. Challenging but achievable as far as selecting options, from a wide range, narrowing down to a few specific to the farm and we were happy to enter into, then to one that we could do. It would have been different if we had not found this one option. A couple of queries post application, but could not fault that.

Views on ELM?

As a farmer I would find ELM incredibly complicated on where it is going and what it is trying to achieve. Schemes up to now have been based on income foregone so paying more or less a sensible equation of income. They have not been about making a profit; the benefit is taking out land that would not have made much profit anyway, eg arable field margins. The payments for many options in existing grassland were low, because management wasn't making much difference; schemes won't pay for a gain they feel they already have, unlike paying to revert arable back to grass. If we're turning 40 years of CAP support into ELM it has to be carefully structured, it has to accommodate all the land and farming types in the UK. The High Weald is more like the uplands in this, though it has the advantage that farms can do diversification. ELM can be a good post Brexit scheme, but most farmers got <£30K BPS as a basic income to meet the bills etc. Unless you replace BPS you will not keep people on the land and it will change; this is still an objective of CAP. ELM needs to have a process and to be able to adjust, both the agreements and the whole approach. Agreements: independent qualified advisers apply, submit evidence, monitor and guarantee the scheme. Approach: if we're losing farmers, ELM is not working and it needs to change.

Supporting grassland farmers?

Without the bottom line of £25-30K that keeps most small grassland farmers in business they will go, and the land will be taken over by bigger farmers with more land and stock. If you pay this as a baseline for a farmer to keep a livestock system you can change methods eg by making hay instead of silage, creating wildflower meadows, bringing in species-rich hay to spread so improving grassland biodiversity.

Helping young entrants on grassland farms?

There are lots of opportunities on underutilised land for this, and for a young person to go into a farm say with a few sheep on a share basis with the owner, but there is no incentive for the owner if they are penalised through the tax system. Give an incentivised payment to eg under-25s and use tax breaks, don't overtax young people at the start of their careers.

4.5 Information from case studies

This study had access to four case studies from practitioners working in the High Weald AONB:

- Angela Brennan, Estate Ecologist & Assistant Estate Manager, Wadhurst Park
- Caroline Fitzgerald, Conservation Grazier
- David Hobden, Farmer, St Dunstan's Farm
- Iain Parkinson, Living Collections and Conservation Manager, Wakehurst

Their experience spans a wide range of issues relevant to grassland management and restoration, and amplifies many points raised in the background information and the results and comments from the questionnaire and interviews above. Some of these issues and their comments are summarised below.

Help and advice

A network of people, farmers, site managers, scientists, contractors, ecologists, enthusiasts, historians, artists and many more who share the same appreciation for meadow grasslands. The value of advice to teach and enthuse. Needs local people who understand the land and how to manage it in a semi-traditional way. Landowners often have little management knowledge, so they need conservation graziers.

Tools and techniques

Appropriate seed sources – local native wildflower seed establishes better in the High Weald (value of WMI). Appropriate knowledge and techniques for establishment. Appropriate stock – sheep grazing can get long grass down for winter, sites need cattle grazing but movement regulations and testing make it hard to move them.

Costs of management

Countryside Stewardship and BPS have kept farms going. But CS does not recognise the real cost of grazing herb-rich sites especially if organic (doubles supplementary feed cost). There is a cost to getting hay cut (as well as getting contractors at the right time), and no-one wants the hay. CS should pay for temporary electric fencing.

Timing and flexibility

Need to change management year by year, and not always do the same thing at the same time, eg change timing of hay cut so not favouring a few species. Tinkering – doing little and often, see what happens. Timing – winter grazing risks poaching, can lead to thistle problems. Pulse or mob grazing are alternatives. CS blanket prescriptions don't apply in the High Weald; it needs local variation, and varying the timing of prescriptions eg not stipulating autumn reseeding when conditions are poor. Understanding when to cut, when to graze, so deciding what management is needed and at what time.

Monitoring

Set your expectation from the outset, and find simple things to monitor. Looking for three to four indicator species that Natural England's Priority Habitat Inventory (PHI) suggests should be expected in a lowland meadow.

4.6 Discussion

Information gathered from surveys, interviews and case studies covers a wide range of situations and opinions. The survey questionnaire in particular shows that what is vital for one grassland manager may not be at all important for another.

Many valuable threads can be picked up from the survey. A large number of respondents are managing less than 40 ha, and they get their advice and information from a wide range of sources. They are more likely to use their own stock to graze, and more likely to use a contractor for grass cutting. More say they have herbal or multi-species leys than have ryegrass or short-term leys. Nearly $\frac{3}{4}$ are planning to make their grassland more species-rich or improve its wildlife value, while a minority cut it for silage (which is cut earlier and usually more intensively managed). All believe their grassland provides other services of value, although fewer think these are the 'harder' services of flood alleviation, water purification and carbon storage than say beauty or well being. Support from BPS and Stewardship is vital to most respondents, though over $\frac{1}{4}$ have never been in a Stewardship scheme. The great majority like the proposed approach of ELM, though there are reservations, such as the difficulty of assessing results when climatic conditions are changing, and sensitivity to paying for advice, although this is seen as important in developing an ELM land management plan. All types of help for this are seen as important, but web-based information is more important than paper-based, and a one-off visit more important than a regular visit. Group visits to grassland sites are of more value than training and workshops. Most are confident in assessing the species richness of their own grassland, but not knowledgeable about the health of their soil. A poor return from keeping livestock is seen as a major obstacle by the greatest number of respondents, and costs of grassland management figure highly in additional comments made.

These findings are generally reflected in the individual interview results, one exception being less confidence in assessing grassland species richness. In addition, the great majority of interviewees believe Stewardship schemes have covered the costs of managing their grassland very or quite well, and that schemes have worked very or quite well in achieving the aims and outcome of managing their grassland, a view also reflected by the advisers in 4.3 above.

The interviewees reflected the views of other land managers, advisers and practitioners however in calling for more flexibility and local adaptation in schemes, payments that could go beyond income foregone for doing more or additional costs, consistent ongoing advice, and support for group cooperation and working.

Information from the case study practitioners in 4.5 reinforces these views, and is a final confirmation to this study of many of the key issues that need to be addressed in the recommendations for an approach for grassland management in ELM, such as the role of help and advice, appropriate tools and techniques, covering costs, and timing and flexibility.

The case study practitioners also amplify the views reflected elsewhere in the consultation on monitoring, and the need to set expectations from the outset, and find simple things to monitor such as a few indicator species. This is a vital consideration for an ELM scheme that is proposing to ask land managers to do some of their own evaluation and monitoring, and could potentially pay them by the results they achieve. ELM could fall down not only on not achieving these results, but on disappointing the expectations of entrants to the scheme, and penalising them as well.

5. From Stewardship, to ELM

5.1 Summary

- Grassland management and creation have always been key targets – if not the key targets – for the delivery of Stewardship scheme objectives, and the rewarding of those who enter in to contracts (‘agreements’) to deliver them.
- **This first section** examines the context to how ‘Stewardship’ agri-environment schemes arose, reviews of past schemes, and the evolution in thinking through which the current Countryside Stewardship (CS) scheme has come into being.
- The range of options and level of incentives in CS, its structures and process, and the basis on which it pays agreement holders are reviewed and critiqued.
- **The second section below** explains the context behind the development of a new ‘Environmental Land Management’ (ELM) scheme, and how grassland in the High Weald can deliver multiple ‘ecosystem services’.
- The approach that has been proposed so far for ELM, including for a Land Management Plan (LMP), is set out, and some alternative contracts to the standard Stewardship scheme agreement are explained, as well as the fit of ELM with a grassland NRN, and the call for trials of ELM by Defra.
- **The final section below** goes on to examine ELM as an alternative to CS, and makes recommendations on how an ELM scheme could be applied in the High Weald, how revisions to CS could feed in these, and proposals for further tests and trial in the area.

5.2 Evolution of agri-environment schemes

The current Countryside Stewardship agri-environment scheme is the end result of a policy evolution in how to financially reward positive management by farmers and landholders of important habitats and the species they support.

Appendix 4 sets out a simplified evolution of agri-environment schemes (AES) in England (NB woodland schemes offered by Forestry Commission are not included). The Environmentally Sensitive Areas scheme broke the mould of payments for one-off capital items nearly three decades ago, with a menu of options and annual payments plus capital works costs, and became the model for the ‘Stewardship’ schemes that followed. This also created the legal agreement as a contract with government for the delivery of environmental goods, through a set of prescriptions and limits eg dates during or after which grassland could be grazed or cut. Stewardship schemes have always had a strong emphasis on biodiversity, with other elements such as landscape and historic environment rather secondary, although access was a strong element in early schemes, and soil and water have become more prominent in CS. They have also evolved from the management of grassland and ‘edge’ features such field margins, to taking in more in-field, whole farm options such as nectar flower and wild bird seed mixes.

5.3 Reviews of Stewardship schemes

From the outset, Stewardship schemes have been examined as a mechanism for delivering real outcomes for the (part EU, part UK) public funding going into them. To quote from a 2012 report on the North Kent Marshes ESA:

‘An independent review of the ESAs and [the] Countryside Stewardship [scheme] (CSS) conducted in 2003 concluded that the ESAs had at least partially succeeded in maintaining the wildlife value of the areas they covered, in maintaining and enhancing landscape values and in maintaining the value of the historic environment. However, the review also concluded that the ESAs had had limited success in restoring and enhancing habitats and other more complex environmental features. The relatively simple, prescriptive approach to management used in both ESAs and CSS was identified at the time as a major factor limiting their success in this respect.’

The ‘entry level’ (ELS) part of the successor to CSS, Environmental Stewardship (ES), aimed to pay for a basic level of environmental land management going beyond cross-compliance, while the HLS part was designed to encourage a greater focus on outcomes, and the use of ‘indicators of success’ to supplement prescriptions. A 2016/17 ‘Agri-Environment Monitoring and Evaluation’ review carried out for Natural England concluded that management under the HK6/HK7 (maintenance / restoration of species rich grassland) options had had a net positive effect on the condition of species rich grasslands, but improvements were smaller than expected: 25% of sites had improved, while 64% were maintained, and 11% declined (a net gain of 14%). There was evidence that certain schemes or option packages were positively associated with specific outcomes, and that ELS was conserving landscape character, and HLS both conserving and enhancing it. Field boundary and low-input permanent grassland options were conserving rather than enhancing their respective targets. □ Among lessons learnt:

- Potential to develop new grassland options for multifunctional services □
- Design and set up of individual agreements is critical in determining success or failure - 50% of heathland options included non-heathland habitat
- Baseline condition of features and potential for restoration is sometimes misinterpreted - 32% of HK6/HK7 sites were unlikely to deliver species rich grassland
- Objectives to be set with specific reference to characteristics of the site □
- More ambitious and demanding interventions sometimes needed □
- Indicators of success sometimes need to be better tailored to sites and more realistic and achievable □

Although the review mainly related to ES rather than new CS, and it is too early to evaluate outcomes from CS, it does not differ fundamentally from ES in its ‘prescriptions plus indicators of success’ approach, despite being much more targeted. The lessons learnt above can legitimately therefore be carried forward to a consideration of how ELM might work better for grassland management.

5.4 Current CS options relevant to grassland management

The Countryside Stewardship scheme currently in operation has a wide-ranging menu (including annual options and supplements, and capital works) that can apply to grassland management in the High Weald AONB. These are summarised in Appendix 5, which also classifies them into types eg grassland management or creation, wet grassland, heathland. They are also classified according to where they are available, ie on permanent grassland, temporary grassland or arable. There is a wide range of habitat and species centred options, from management of wet grassland for breeding waders, which is aimed at sites of known conservation value, to ryegrass seed set for birds, where an otherwise intensive grassland management type is being modified for an improved environmental outcome. Organic or other options eg historic are also potential ‘overlays’ on an area requiring some kind of work by a grassland manager. CS could be criticised for this plethora of choices alone, although it should be acknowledged that it reflects an evolution of possible entry

points into Stewardship from the simple one or two tiers of the ESA, and is therefore more inclusive. With a handbook for options in Mid Tier alone of 331 pages, it does however mean that those who have experience of submitting CS applications and know what to look for are better placed to get the best out of the system than the average farmer or landholder.

5.5 CS structure and processes

CS is an elaborate structure, rooted in its managing body's researched and experiential views on how features and habitats should ideally be managed, translated as a set of options and prescriptions available to the land manager, and set in a framework of commitment, reward and monitoring that forms a legal agreement to deliver the options. With the intention of providing clarity and avoiding misinterpretation, each part of this structure can be cumbersome, rigid and hard to follow, even where it works.

Specifications and prescriptions

Every option that can be applied for in CS comes with a statement of where it can be used, where it cannot, any criteria that must be met, and any features that can be included. The latter is important, as some features in a field may be ineligible for BPS but eligible for CS, eg permanent water features and tracks. This is followed by the management requirements (prescription), any restrictions eg cutting or grazing dates, and any activities that cannot be carried out. Records that need to be kept, and any evidence or third party consents that must be sent with the application, are listed.

Related options that can be carried out on the same area, and some advice and suggestions for carrying out the option, are given. Even for someone experienced in making CS applications, there is considerable scope to trip up over a technical eligibility issue, at best leading to queries and challenges post application, and at worst making an otherwise useful option on a particular piece of land ineligible.

Processes and paperwork

The administration of CS has moved to the RPA. For MT this is now a self-service process linked to the online Rural Payments Service, and an application pack will be generated and e-mailed once a request has been made. The pack will contain a writable pdf application form, and an excel spreadsheet prepopulated with all the field parcels linked to the business in which to write the options chosen. A historic environment record (HEFER) will be generated and e-mailed if there is a notable site on the holding. Applicants will not need to send any additional evidence alongside their application, supporting annexes, Farm Environment Record and Option maps except in certain circumstances. The application form requires details of the farm business, and countersignature by a landlord if the applicant does not have control over the land. Applications must be submitted by 31st July. It remains to be seen how the new system will work; previous application widows have been dogged by late arrival of application packs. While the steady movement toward a paperless, online system is consistent with all other forms of modern communication, it will disadvantage many grassland managers in the High Weald who due to age and background cannot engage, so will be left out or need to rely on agents.

Offers and payments

All applications are scored against CS priorities, except for applications for the four CS 'Offers for Wildlife', and those that only include organic conversion and management options. □ Successful applicants should be offered an agreement in November or December for an agreement start date of January 1st 2020, with 20 working days to accept or decline the offer. Agreements cannot be amended once an agreement offer is made; applicants can only accept or reject the agreement offer.

Agreement holders claim for multi-year payments online using the Rural Payments Service by 15 May each year, and should then be paid in arrears subject to any reductions or penalties eg after inspection. In practice, payments for all Stewardship scheme agreements have been notoriously delayed, leading to claims of RPA incompetence, agreement holder hardship, and even to legal challenges.

Facilitation funding

The Facilitation Fund (FF) within CS supports groups or ‘clusters’ of land managers, led by a facilitator, to deliver landscape scale objectives collectively. As well as a payment for its facilitator and activities to a FF group making a successful application, membership also gets any applicant to CSMT a 20% ‘score’ uplift. All FF group participants must sign up to an agreement they draw up collectively, and submit maps showing the area and land covered by the group members (minimum 4 holdings or 2000 ha). The group can then organise meetings and training in fulfilment of the particular objectives they have set themselves. The Upper Rother and Dudwell Farm Cluster in the High Weald AONB currently has 40 members and includes a range of landowners, from larger commercial mixed farmers to small meadow owners. It has taken on issues such as controlling deer populations, and improving soil health and the value of grasslands for forage and wildlife. The FF approach has been one of the few aspects of CS to be widely applauded, and its model of collaboration between farmers and landholders on a landscape scale is likely to be at the forefront of thinking around the future ELM.

5.6 Flexibility in management

Several of those consulted for this study commented on the need to be able to adapt to circumstances and in particular to apply and remove harder grazing when the need arises, or to mob-graze on a site to kick-start management. For those in Stewardship schemes, if this departs from written dates, grazing periods, seasons or stocking levels in their agreement prescriptions, it requires a derogation, with written approval from NE in the case of HLS prescriptions. Aside from the time needed to obtain an HLS derogation, it is by definition intended to be ‘a minor and temporary change from the agreed management prescriptions... needed on a single occasion’, so pre-empting repeated and major changes, however justified. The amendment process in CS is similarly prohibitive. Increasing fluctuations in weather patterns were commented on by interviewees, with unseasonal wet and dry periods that can create both unexpected cutting and grazing opportunities and the need to manage grassland when growth is unexpectedly lush. The standard Stewardship scheme derogation and amendment process cannot react quickly enough to this.

5.7 Income foregone as an incentive

Land managers and advisers often make an objection to the ‘income foregone’ principle, based on EU rules and followed in all UK agri-environment schemes. These have been used by Defra to set the (very exact) area payments for options such as the CS ‘management of species rich grassland’ at £182/ha/year. CS payment rates are intended to reflect any income lost in undertaking scheme options, and also to allow for any additional costs directly incurred in implementing those options. The rates set for payments seek to reflect the typical income foregone for particular activities on an England-wide basis. In putting out the contract to come up with these values, Defra stated that ‘Calculations include a range of inputs and outputs, which are very detailed and go beyond gross margin comparisons. This is to reflect the fact that some farmers will have an actual income foregone above the average, and others below. [...] it is important to accurately determine the

elements that contribute to these costs and in doing so also remain consistent with the verifiable standards set by the European Commission.’

The resulting calculation that the income foregone that needs to be made up from grazing species-rich grassland is far less than eg in having 6 m buffer strips round arable fields or sowing and maintaining a nectar flower mix may be based in accurate determination, but needs to be enough incentive for a grassland manager to keep sites in a Stewardship scheme that for reasons stated above are unrewarding and limiting in other ways.

Nonetheless, the majority of those interviewed for this study believe that Stewardship scheme payments have covered costs either well or fairly well, although there were some comments from other interviewees and in the case studies about needing to cover the true costs of grassland management, and especially recreation projects which have high upfront as well as ongoing costs.

5.8 AES, WTO and agricultural support

In looking at the freedom Defra has post-Brexit to come up with radical alternatives to an income foregone basis for its ELM scheme, the issue of conformity to World Trade Organisation (WTO) rules of any national AES is often raised. The particular issue is whether the WTO Agreement on Agriculture (AoA) amber, green and blue ‘boxes’ that deal with domestic agricultural support would allow for more than income foregone plus costs. The rather complex ‘box’ system is only important to this report in as far as it may not be in some commentators’ views such a stumbling block to environmental support as is often supposed.

Dr Ludivine Petetin, Cardiff Law School (blog post based on a talk given at the Game and Wildlife Conservation Trust All-Party Parliamentary Group meeting in March 2018) sees scope for such support in both the ‘amber’ and ‘green’ boxes, though she states; ‘The EU has successfully transformed its agricultural support under the CAP from the amber box to the green box. Whilst this change has not been challenged by other WTO members to date, if the UK were to adopt a similar approach, new programmes could be challenged since the UK will no longer be part of a strong trading bloc. The compatibility of future support based on public money for public goods under the green box remains to be seen. After Brexit, the immediate notification of payments for ecosystem services under the green box could negatively impact on the UK if the schemes are not consistent with the criteria under the box.’

On the other hand, Prof Allan Buckwell, Senior Research Fellow at the Institute for European Environmental Policy (pers. comm. to the author) states; ‘I constantly hear people debating the limits on environmental payments due to WTO AoA rules. There is a strong economic logic that lies behind never paying anyone more than the opportunity cost (income forgone) to them of supplying the good or service. But there has never been a challenge to any country’s environmental payments because they have failed to respect this condition. I suspect this is partly because there are much larger and more obvious trade distorting subsidies to go after, and because politically it seems churlish to go after what might be quite generous payments explicitly directed towards environmental delivery when this is the policy direction most believe is necessary and correct. The calculation of income forgone is never straightforward and there is a huge range in payments apparently justified this way around the EU (with no WTO challenge). The other thought is that mounting a challenge is a time-consuming slow process with significant expertise cost so there would have to be significant injury felt by some other party to justify the effort. I think the fears of restriction from WTO rules are overblown. More important and challenging is to persuade the treasury of a justifiable extent and nature of ELMs expenditures.’

5.9 Discussion

It would be easy to say that the point reached at the start of proposing an approach to the new ELM scheme for grassland, is one of a current Stewardship scheme that is complex and bureaucratic, with options that have proliferated over time, with lessons learnt about its processes and outcomes, that lacks flexibility to react to on the ground situations, has payments that may or may not reward the grassland manager adequately, are currently being paid late, and which are pre-determined by an exact calculation based on an assumption that may not apply post-Brexit.

It should be acknowledged however that for an individual applicant, regardless of the complexity of the process, if the result is an agreement that suits their holding, their aims, and their expectation of reward, for them it is satisfactory. Ironically, the risk of not being accepted due to the competitive nature of CS has been largely irrelevant due to the low number of applicants. More relevant is the 'quality not quantity' objective of CS, which aims for a reduction in the agricultural area engaged in schemes from a peak of 70%, to 35-40%.

Also, CS was engineered to meet a particular need, and to address issues and criticisms of how well previous Stewardship schemes had delivered for habitat management. In this, management of grassland figured highly, with a view that ELS low-input options in particular had done no more than preserve a status quo, and in future grassland options should be more targeted and evidence-based. CS also recognised that some grasslands in productive systems can be created or adapted to have more wildlife benefit, such as in the ryegrass seed set option.

This is mirrored in views from the consultation about the need to recognise productive grasslands and their role in viable farm systems, and is a small but vital window into options for future ELM scheme support discussed below. In this, grassland types such as herb-rich leys or systems such as mob grazing could be supported, providing additional habitat and species support, resources to an NRN, and buffers and linkages to existing species-rich grasslands.



Arable land reverted to grassland in Higher Level Stewardship scheme

6. Environmental Land Management

While CS agreements will potentially be starting until 2024, trials will have begun by then for the new ‘Environmental Land Management’ (ELM) scheme, to which all agri-environment funding will move post-Brexit. Although there is no fine detail on how ELM will work or its criteria, the approach that ELM will take in engaging land managers into an ELM ‘contract’ has been given some publicity. Also, it is known that Defra is keen to include rewards for a wide range of public benefits, environmental goods and services, and is also exploring rewards for high levels of animal welfare and native breeds. Stakeholder consultation is ongoing, including tests and trials for new methods, and on the role of advice in the ELM process.

6.1 Context of the proposed scheme

In a statement on the Agriculture Bill, Defra talks specifically about spending ‘public money for public goods’, and says ‘This will leave the environment in a better state than we found it, fulfilling our ambition for a green Brexit and helping to deliver promises set out in the government’s 25-Year Environment Plan. On ELM, Defra states; ‘Our new environmental land management system will bring in a new era for farming, providing an income stream for farmers and land managers who protect and preserve our natural environment. For the first time, farmers and land managers will be able to decide for themselves how they can deliver environmental benefits from their businesses and their land, and how they integrate this into their food, timber and other commercial activities.’

6.2 ELM and grassland ecosystem services

According to a report from the High Weald Unit *Fields in the High Weald: an overview of their social, ecological and economic value [P2]* dated October 2016, ‘Fields provide a diverse range of ecosystem services which — following the convention set out in the UN’s Millennium Ecosystem Assessment, the UK’s National Ecosystem Assessment, and the Economics of Ecosystems and Biodiversity report — may be classified as either: i) provisioning, ii) regulating, iii) supporting or iv) cultural.’

The list of ecosystem services relevant to grassland management in the High Weald AONB provided by fields is extensive and includes;

- Food/livestock & crops (provisioning)
- Fresh water (provisioning)
- Raw materials (provisioning)
- Genetic resources (provisioning)
- Climate change mitigation/carbon sequestration and storage (regulating)
- Water flow regulation (regulating)
- Soil fertility maintenance (regulating)
- Pollination (regulating)
- Habitats for species (supporting)
- Cultural history and national identity (cultural)

This wide range of services amplifies the comment in the ‘lessons learnt’ from Stewardship schemes at 5.3 above that there is scope in a future scheme to develop new grassland options for multifunctional services.

6.3 ELM approach and proposals

Defra has set out clearly the system design principles of ELM (presentation to FWAG conference December 2018):

- ELM will apply a natural capital approach in investing public money in the delivery of environmental goods and services. The system will focus on the delivery of outcomes, as outlined in the 25-Year Environment Plan (25YEP)
- ELM will operate above a strong regulatory baseline and support greater application of the polluter-pays principle
- ELM is not an entitlement, but will be accessible to all land managers who are able to supply public environmental benefits and for which there is no current market
- Land managers will be in control of how they deliver the environmental outcomes. This will be outlined in a [land management] plan that they develop and own, and may reflect local priorities
- ELM will be designed iteratively and with active input from users and stakeholders to ensure user-focussed design. It will be tested, trialled and piloted before launch
- ELM will seek to minimise the administrative burden and reduce complexity for participants
- ELM will be innovative, ambitious and maximise value for money to the taxpayer. The new system of payments will not crowd out private investment in public goods.

The key to the ELM will be the Land Management Plan (LMP). As envisaged, in a Defra presentation to CSFF national event October 2018, the LMP:

- [Is] owned by the farmer or land manager
- Could encompass [the] whole operation, both production (food, agro- forestry, recreational) and environment
- [Has] planned measures covering [the] following 12 months, as part of structured longer-term actions and intentions
- Could be part of [a] wider catchment or landscape group
- [Has] payments based on the environmental outcomes
- [Is an] open-ended contract with annual independent inspection/audit
- [Is] lodged on [a] freely accessible platform .

See also the schematic diagram in Appendix 6, taken from this. Those responding to the survey or interviewed were overwhelmingly supportive of an ELM with payments based on environmental outcomes ('payment by results'), and of developing their own LMP, although with several qualifications and reservations that might be expected around a scheme which at this moment exists only as bullet-point aspirations.

The October 2018 outline of the ELM scheme also suggested that LMP may be required to be locally peer-reviewed, benchmarked, and compared with other local plans. There could also be potential linkage with Farm Assurance plan requirements and sustainability benchmarking. Other possible elements:

- Reflecting local/regional priorities/particular features
- Engagement with local community encouraged

It was also stated that 'expert advice and sign-off will be required for the plan – to confirm it should provide the intended environmental benefits'. If the key to ELM is the LMP, then the key to the LMP is the role of expert, external advice. This will be vital in a scheme where set prescriptions

are not the norm.

The December 2018 presentation gives ‘current thinking on the purpose of advice’:

- Long-term behavioural change
- Participation of land managers in ELM, to a level required to meet the ambitions of the 25YEP
- Successful delivery of the broad objectives of ELM, as opposed to cherry-picking of easiest outcomes
- Successful delivery of outcomes at a landscape scale through facilitation
- Successful delivery of planned outcomes at an LMP scale
- Retention of benefits realised under existing agri-environment schemes
- Positive adviser experience for land managers

Again, those responding to the survey or interviewed are very focused on the need for appropriate advice, both in terms of where it comes from and how frequently input is needed, with (perhaps surprisingly) a regular visit from an adviser not always being a priority. Other sources of help are seen as very important, including web-based information, and group visits to grassland sites. These views are important in arriving at any recommendations in this study.

The December 2018 presentation goes on to suggest:

- The land manager has the opportunity to choose an accredited adviser (from an approved list)
- The adviser helps the land manager in producing their LMP
- The adviser offers support to the land manager when needed to deliver the LMP
- The adviser reviews and updates the LMP (suggest formal review every 2 years, but opportunity to update more regularly if required as part of support)

‘Early thinking’ on monitoring of ELM (Defra October 2018) suggests:

- Participants would need to demonstrate compliance with scheme requirements through audits
- Minimal, risk based monitoring and inspecting would be undertaken to improve the quality and application of plans
- Audit process aimed at encouraging participants to strengthen performance
- Penalties applied only where flagrant failings are apparent. Suspension from scheme, payments only resume when full compliance demonstrated again
- Fixed sum penalties applied for regulatory breaches plus prosecution for fraud

This approach reflects the many views expressed in the consultation on the need for monitoring to be simple, proportionate and focused.

6.4 Beyond the stewardship agreement

The ELM ‘contract’ clearly moves away from the classic Stewardship scheme 5- or 10-year agreement between a government body and a land manager. A number of possible mechanisms are mentioned in the 25YEP, and also the potential for the private sector to be a funder. Among the mechanisms are:

A **conservation covenant** is a private, voluntary agreement between a landowner and a responsible body, such as a conservation charity, government body or a local authority. Government plans to introduce Law Commission proposals published a report on conservation covenants in 2014, with some amendments, and is currently seeking views on the demand and potential for conservation covenants, safeguards and cost/ benefit.

In a **reverse auction** process, applicants for funding name the price they believe is fair for the work they propose, with the implication that the lowest bids will be successful. This approach is currently being trialled in the Weald by Natural England for creating or managing ponds in the wider countryside, as an alternative to trying to provide habitat within new developments for great crested newt, or moving them to new locations.

A **payment by results** - *Results-Based Agri-environment Payment Scheme* (RBAPS) - has been running since 2016 in two pilot areas, including a grassland area in Yorkshire. Agreement holders get paid by results, management actions taken are not assessed, and agreement holders can choose the most suitable method to achieve the agreed end result. There are no set management prescriptions for farmers participating in the pilot, though a large part of the project focuses on advice and training. Some of the grassland project farmers can enhance this through a series of capital works such as adding native seed to meadows.

These and other mechanisms are worth exploring for the High Weald AONB, with its identifiable landscapes, and where third sector funding such as Sussex Lund, and Water Company partnering with farmers to pay for drinking water safeguard, are well established. In addition, they may provide an alternative for those who now fall (or put themselves) outside the present CS system, yet are still active in the conservation of grasslands. 60% of wildflower meadow seed distributed through the Weald Meadows Initiative goes to grassland managers not in a Stewardship scheme. As well as those put off simply by the bureaucracy of the process and the delays in processing and paying, non-engagers in Stewardship will include:

- Tenants and others without the control over land for a multi-year term
- Small landowners not on the RPA system and reluctant to join it
- Those with a limited duration, single issue or one-off project in mind
- Those with the funds to do most of what they want to do in any case
- Those close to retirement not wanting a multi-year agreement

One interviewee commented that new owners coming in with money are ‘people who don't know what they don't know’. An ELM scheme, with a proactive approach to reaching such owners with advice and information, could help them do good work, and potentially prevent them from doing harm.

6.5 ELM and a grassland NRN

There are strong links and common themes between the vision for the 25YEP and ELM, and the High Weald Nature Recovery Network development proposal. In its statement on the Agriculture Bill, Defra says; ‘These goals [in the 25YEP] span clean air, clean and plentiful water, thriving plants and wildlife, reduced risk of harm from environmental hazards, enhanced beauty, heritage and engagement with the natural environment, and contribute to the network of enhanced habitats – the Nature Recovery Network.’

The October 2018 outline of the ELM scheme also sates as a possibility for the LMPs that ‘Contents of the plan may be influenced by membership of a group, steer from a facilitator or local environmental project governance (e.g. linked to Nature Recovery Networks, catchment partnership etc.)’

The unimproved, species rich and semi improved grassland natural capital of the High Weald clearly links to the natural capital approach within ELM, and the collaborative work of the Weald Meadows Group is the type of approach that will be favoured in the scheme.

The emphasis on advisory expertise within the public, NGO and private sector and on individuals qualified to identify, advise on and oversee an NRN, echoes Defra's stated belief that expert advice and sign-off will be required for the LMPs (and its concerns at finding this expertise), while the NRN is looking to investment from both public and private sources in the same way as ELM and the 25YEP.

6.6 ELM trials

Defra has set out to work with stakeholders to co-design the new ELM system. This process involves both 'tests' and 'trials' as a means to work with farmers, land managers and stakeholders so that they can contribute to the contents and design of the new system. Trials 'Provide proof of concept for new ideas, allow us to assess the relative deliverability and value for money of more novel or innovative delivery methods, as well as understand the role they can play in the future scheme.' (Defra December 2018 presentation).

Defra received over 100 initial proposals from stakeholders with suggestions and ideas for tests and trials, and has reviewed the proposals and set out which it will take forward. While only two of these specifically mention grassland (one in an upland context), 20 include various aspects of natural capital, ecosystem services, public goods and/or landscape. There is a wide range of approaches and scales, as well as actors and target themes eg wetland, historic, upland. Defra has put out a call for further trial proposals to be submitted by 1st April 2019, and the High Weald AONB should be well placed to come forward with a proposal around the NRN concept and grassland management.

6.7 Discussion

It is as hard to overstate the significance of the development of ELM, as it is to overstate the significance of the removal of BPS payments. Together they are a seismic shift in support for farmers and landholders, in which delivering goods such as landscape, clean water and wildflower meadows is as important as producing food. Indeed many farmers, and the National Farmers Union (NFU) in particular, argue there is a risk of getting the balance wrong, with food production pushed to the background. Nonetheless, farmers recognise that the future is about food production in harmony with the environment, not one or the other, and that 'we will have to be better at describing and justifying why we should be recipients of public money' (NFU vice president Stuart Roberts, address to NFU Brexit meeting 12.2.2019).

It must be recognised however that concepts such as natural capital, ecosystem services and public goods do not readily translate at farm level. One vital message that an NRN and this report needs to give to an emerging ELM scheme is the need to make these concepts simply understood and translatable into something that a grassland manager can grasp and work with, and also to ensure that all landscapes can be described and valued in the new support system. The difficulty of getting to farm level with natural capital is not just a concern for farmers (Prof Allan Buckwell again); 'I've never been convinced that [environmental payments] can be based on estimated values of what society thinks they are worth. Apart from the conceptual and practical issues of valuing these ecosystem services, in economics one never pays the value to consumers, rather we seek to pay the marginal cost of providing the last unit which someone is prepared to pay for... what is the purpose

of all the attempts to value natural capital and the services it provides, apart from indicating general scarcity and relative public valuations of different services, which I agree is interesting.’

7. Recommendations

Government has signalled a clear break with previous agri-environment schemes, and a new kind of support system for agriculture is in preparation. This study does not need to argue for radical change - it is happening - but the new ELM system must keep the positive aspects of past Stewardship schemes, and what they have achieved on the ground. The key issue for the study is how ELM can best deliver for the landscape of the High Weald, and for grassland management and managers. Another issue is the extent to which ELM can address some of the background issues that apply to land management in the Weald, by bringing in more broadly based support, or if some of these factors need additional policy instruments.

Two different kinds of agri-environment scheme are encountering each other, and each might appeal to grassland managers in different ways. The Agriculture Bill says the ELM contracts farmers will enter into are ‘in sharp contrast to the inflexible nature of the current system.’ While many consulted are supportive of the ELM approach and of payment by results, there are many qualifying comments, and for some the ‘inflexible’ approach of a prescriptive scheme is still attractive.

How the two approaches match up is set out below:

Flexible (ELM as proposed)	Prescriptive (Stewardship now)
Complex, but land manager more in control and able to change	Simple, but does not allow variation, only one-off derogations
Can adapt what you do and when	Know what you have to do and when
Uses guidance, and expert advice	Handbook sets out dates and periods
Works best with payment by results, so can get more for doing more	Works only with set payments, and no reward for doing more
If bidding for a contract, applicant can decide own reward level, but could be a race to the bottom	Known value of agreement allows applicant to decide if income level is enough and to budget
Needs time and knowledge so works if you are farming the land (grazing, cutting) and/or needs good advice	Needs less time and knowledge if you are not the land manager, or if you are a non-farmer
Monitoring can follow indicators set by land manager and adviser with ability to change with progress	Monitoring is set by external body and requires strict compliance with dates, areas, numbers etc.
Benefits from a cooperative approach and sharing of experience and information plus advice	Benefits from help with making application to the scheme and in explaining rules
Suits (larger) farmers, managers and owners better?	Suits (smaller) non-farmers, contractors and tenants better?

A ‘flexible’ ELM scheme that turned its back on any advantages in the traditional, prescriptive Stewardship scheme would miss an opportunity. The 8 recommendations that follow are designed to allow ELM to have both approaches, address where possible some of the background issues for, and deliver the best grassland management across as much of, the High Weald as possible, by as many types of land manager as possible, and providing as wide a range of services as possible in keeping with the aims of the grassland NRN.

7.1 ELM should be one scheme, one delivery

The Agriculture Bill sees farmers and land managers being able ‘to earn money delivering two types of goods and services: through selling products (like food or timber) on the market; and providing environmental services and benefits that society relies upon, which will be supported by government funds’. It has been of some concern in the farming industry that in this scenario production of food is not seen as a public good in itself, although there could still be future support for measures around productivity and volatility, and for special areas like the uplands. There are many socio-economic factors around supporting grasslands in the High Weald and those who manage them, and they link to the environmental factors, as this study and the responses of those consulted in it have shown. An ELM scheme with too narrow focus on ‘public goods’ measures, and where socio-economic support is in a separate box, will miss an opportunity to address a wider range of issues than previous Stewardship schemes, and risks one future scheme working against another. Moving away from a profit-foregone approach also allows a scheme to pay the agreement holder what is needed to achieve the results required, not just some notion of lost income. Much of the farmyard and other infrastructure vital to livestock management in the Weald especially on small farms has lacked investment for many decades, and this can be addressed.

Recommendation [1]

ELM should be a single delivery scheme including both production and environmental measures. ELM should have continuity with previous Stewardship schemes and retain the benefits they have built up for managing grasslands, as well as the experience of those delivering them. ELM should be able to pay for a wide range of capital works relevant to grassland management in the High Weald, including temporary electric fencing, and in particular for the renewal and improvement of farm infrastructure.

7.2 ELM should be adapted to the High Weald

The High Weald is a unified cultural landscape, greater than the sum of the individual elements in it such as biodiversity, water, woodlands, and historical features. In the same way that upland landscapes deserve support, support is as justified to maintain people in this landscape as it is for the landscape itself. People who farm and manage the land create the varied grassland types this report has described, and the many ecosystem services these provide. There are many difficulties to managing land in the Weald, some that are common to farming in general, some inherent in the area’s physical and social characteristics. An ELM scheme may not be able to address all of these, but in a locally adapted and guided scheme, some of its measures could. It follows from this that socio-economic support for the Weald is as valid as environmental, and the balance between productivity and biodiversity is vital for the individual land manager.

Recommendation [2]

ELM in the High Weald must be designed for the High Weald. ELM should determine as wide a range of objectives for the scheme locally as possible, by consulting as wide a range of people in it as possible. ELM should ensure the specific needs of those creating and managing grasslands are met, for support and advice. ELM should promote the multiple values and ecosystem services that grasslands in the Weald provide, and make sure local scheme delivery brings these out as much as possible, and rewards those delivering them. ELM should support group working and connectivity through the landscape, especially to link and buffer existing species-rich grassland sites. ELM should support network grazing and machinery use. ELM should integrate grassland management with the management of small woods and hedges on holdings. ELM should promote locally produced grass-fed meat from the Weald.

7.3 ELM should be adapted to different entrants

Stewardship schemes have been a one size fits all model, with owners and tenants, small and large holdings, having to meet the same requirements for delivery. Grassland owners can find themselves asking graziers who may have quite different objectives for the land to deliver the scheme for them and keep to all the rules. Farmers tenanting areas of grassland from non-farmer owners can feel these are getting Stewardship scheme funding for doing nothing. Small landholders have to worry about having stock or getting someone to bring it in. Large farming businesses worry about the decline of productivity on, or even of the asset value of, Stewardship land. Young people look for opportunities to get a foothold in farming and land management, without being to pay high rent or afford much capital outlay. It has been noted that the High Weald had a significantly lower uptake of Environmental Stewardship than the national average, with small farms less likely to participate. BPS created many anomalies and allowed eg 'dual use' claims. With this going, ELM can be more adaptive to land managers individual circumstances.

Recommendation [3]

ELM must provide different arrangements and payment models for different entrants. Owners and tenants should be equally able to enter contracts, without one or the other losing financially in some other way. It should be as easy for the manager of a small area of land as a large farm business to get an ELM contract, and as easy for non-farmers. Contracts should be able to take in both one-off or short-term (mainly capital) projects eg a simple grass reseeding and long term management eg of a set of species-rich meadows. Contracts should allow old style and prescriptive 'by the book' set payment as well as flexible and reactive 'by results' management approaches to grassland management. An ELM contract should give recognition to the active manager of the land where the owner has no part in delivering the management of grassland. ELM should support new/young entrants in the High Weald as they can have a real impact on managing under utilised grassland. ELM should target new and non-farming owners as without good advice they can have a negative impact on their grasslands.

7.4 ELM should have simple processes

The two manuals applicants to Countryside Stewardship need to read come to over 460 pages. Finding the options in them that might be relevant to the creation or management of grassland in the High Weald is just the start of a process that involves forms, maps, justification and evidence, even before the application is submitted and judged. ELM is very clear that it aims to move away from this ‘paper-heavy’ system to one where the land manager decides what to do, and how much to ask for in return. The key to ELM as proposed, is a three-way relationship of advice, land management plan (LMP) and contract. The adviser provides input and expert opinion to the applicant’s LMP, which sets out how they intend to deliver the environmental benefits from their business and their land and how they integrate this into their commercial activities. The ELM contract is an agreement to deliver the environmental benefits and the value of the contract is the payment for this. No support scheme giving public money for land management can be free of processes, or checks on what has been delivered. However ELM can give the contractor much more control in this, and alongside local adaptation to the High Weald has the opportunity to work well for grassland management in particular; and here technology can play a role.

Recommendation [4]

ELM should have simple procedures for making applications, monitoring of progress and results, and in processing payments. The LMP produced to access the ELM scheme should be based on simple forms and maps and available online; experience of the previous ELS online and current BPS systems should provide useful guidance here. Provision still needs to be made for applicants without online access or skills; the independent adviser help could include capacity for the adviser to input an applicant’s details for them. Capability for group or linked applications should be built in; this would also allow eg a group of grassland managers making an application together to share knowledge and experience. ELM should have simple ways of registering baseline information and calculations with an application, and of setting ongoing milestones or time periods against which to monitor. Results monitoring should be against simple indicator species, with ongoing advice to achieve results and clearly non-penalising in all but exceptional cases. For grasslands in the High Weald these species could be chosen for the specific site against a typical reference background for the habitat type. Quick assessment methods should be developed for covering large holdings or groups of holdings, and remote sensing is worth exploring for this.

7.5 ELM should have appropriate guidance and support

Lengthy as it is, the handbook of options for the current Countryside Stewardship has one value; guidance for generally accepted management of a range of habitats, with ideal timings and periods for management activities. For grassland, this will include periods and dates for grazing and cutting, whether any pesticides, fertiliser or manure may be used, and other guidance such as on an acceptable level of scrub and its control. The handbook is the bedrock of the ‘prescriptive’ agri-environment scheme, and as said above is not without its appeal to some eg when their scheme is being delivered by someone else grazing or cutting the grassland, or where they lack expertise or support to take a more flexible, adaptive approach and still have confidence that their grassland will be reaching its targets on inspection. Advice is the key to giving land managers more confidence; independent third party advice is seen as an essential element of ELM in both advising on and endorsing the LMP, and then in helping to review and improve the LMP every year. If ELM is to work successfully as a more flexible scheme, the availability of advice, and capacity of advisers, must be addressed.

Recommendation [5]

ELM should retain the ‘handbook’ approach of current Stewardship schemes, but allow it to be used in two ways. [1] As reference guidance for applicants on land management and available options including capital works, but with no obligatory management prescriptions and agreement holders choosing the most suitable methods to achieve results. [2] As a manual or blueprint, with cutting dates, stocking rates and other information forming the requirements for management actions that will be assessed and rewarded. The ‘reference’ and ‘blueprint’ approaches will suit different applicants to the scheme, their circumstances or personalities, but for ELM to succeed more applicants should be encouraged or enabled to take the ‘reference’ approach. For this ELM needs to address provision of advice, and the skills of advisers. Suitable advisers will have a range of skills, so for grassland that will mean knowledge of grassland types, species identification, and their management in agricultural systems. ELM advisers must be accredited for their skills, with a CPD requirement, and must know the areas they advise in, so in the High Weald be familiar with the characteristics and landscapes of the Weald. To provide the advisers of the future, colleges such as Hadlow and Plumpton need to teach these skills and others such as conservation grazing and the breeds suited to it. Finally, payment for initial and ongoing advice should part of the ELM scheme.

7.6 ELM should have different payment rates and mechanisms

ELM can pay for what it wants to see done, not just ‘income foregone’. Even free of this restriction, the right level of reward from a scheme is not easy to judge. While most interviewees feel their Stewardship scheme has paid them adequately, they acknowledge it is the combination of this and BPS that have been vital support. One believes a bedrock of £25-30K per holding per year needs to be put into the grassland management system in the High Weald once BPS has gone. Through local adaptation, and using varying payment rates and models of engagement, ELM could go a long way towards this in the Weald. Though not part of ELM, changes to the tenancy and tax systems could also be used as mechanisms, with income tax reliefs for people letting land for longer and for new entrants.

Recommendation [6]

The ‘price list/ready reckoner’ proposed for self-assessment of an ELM contract value should have payment rates that reward distinct levels of costs through different phases. [1] Establishment, when management is bedding in, or there are extra costs eg getting land grazed or cut after neglect, or for a wildflower seeding project. Payments in this phase could also support a whole-farm system managed eg by grazing and hay making, and/or creating wildflower meadows by spreading species-rich hay; rewarding a land manager committed to less intensive farming but needing backing. [2] Ongoing management, when systems are established and only ongoing adjustments are usually needed. [3] ‘Over and above’ payments, when the land manager/adviser can see through a review of progress that there is an opportunity to try a different technique, or add or change something, but that has extra costs. ELM should pay supplements eg on small fields, for use of native breeds. ELM should pay per ha top-ups for eg belonging to a cluster group, PFLA, NRN, LEAF, organic certification. ELM should be able to use any model of engagement that suits the applicant and their circumstances such as a straight contract, old style Stewardship agreement, reverse auction, payment by results, particularly where this reaches those previously not or poorly engaged in agri-environment schemes in the High Weald.

7.7 ELM should support grassland productivity

The approach of ELM, with its emphasis on ‘the knowledge of the person who knows the land best’ and its strong focus on results, will have many positives for grassland management in the High Weald. A grassland manager working to an ELM LMP should be able to put stock on and off land when needed, with as many stock as needed, and to cut meadows when the time is right; using their judgement rather than set dates or permitted periods. This flexibility will allow land managers to avoid undergrazing sites, and the problems of eg getting a contractor at the right time to cut hay. It can also avoid the declining productivity that some interviewees saw as a drawback to long-term tie-up in Stewardship schemes; if the end result is what is important, it can be much more at the land manager’s discretion to balance conservation and productivity. ELM is also a chance for a refreshed look at what a wider range of grasslands in the Weald can contribute, for their own value and in extending, linking and buffering the more valuable sites that the NRN has identified.

Recommendation [7]

ELM should promote and reward more productive options for grassland that have wildlife benefit. The ryegrass seed-set and 2-year legume fallow options currently available in CS are good examples, but others should be targeted or developed eg herbal or multi-species (diverse) leys. The monitoring and assessment processes in ELM must recognise the capacity of the land manager to make decisions about grassland management that do not compromise their long-term productivity, as long as scheme objectives and targets are met. ELM should support productive grassland management systems such as mob grazing with known benefits for multiple ecosystem services such as biodiversity and soil and water protection

7.8 ELM should support joined-up working

The value of cooperation has been cited many times in this report. The High Weald AONB has good working examples of it, such as the MWI work on meadow grassland management and re-establishment using native seed sources, and the Upper Rother and Dudwell Farm Cluster group workshops and meetings on relevant local land management issues. The cluster farm groups approach has been a major plank of the present CS scheme ‘facilitation fund’, with groups and their facilitators supported like the High Weald group to do joint working. Currently that does not extend either to individual farm advice to group members, or to fund work on the ground either one-off or long term. ELM could take this joined-up working to a higher level, with active support to set up groups, fund their activities and give a premium to their work on the ground.

Recommendation [8]

ELM should encourage and fund cooperation in the High Weald between grassland managers of all kinds and in all circumstances. ELM funding should facilitate the sharing of knowledge and experience within and beyond groups as ‘advice hubs’. ELM should fund group adviser/facilitators and the input they have to groups, as well as paying toward members’ meetings and training. ELM should pay a premium for a group LMP, and for any landscape scale work that comes from a group contract between several members. ELM should support existing initiatives such as the WMI and Farm Cluster group with proven track records and profiles with land managers.