

Written evidence from Country Land and Business Association (CLA) (PAE0016)

General comments:

The Country Land and Business Association (CLA) is concerned that Natural England (NE) will rush new designations to reach the 30 by 30 target. This target could be achieved through other means, such as long-term land use agreements or alternative approaches to protection, such as other effective area-based conservation measures (OECMs).

Designation alone has not delivered environmental improvements, and in the case of landscape designations, it has often made housing availability and business diversity worse. Focusing exclusively on the feature(s) for which the statutory designation was made artificially inflates the importance of this feature at the expense of the other functions of the site as a whole. Land on our island is finite, therefore it needs to deliver multiple benefits.

As nature recovers, there needs to be scope to pursue more flexible and dynamic approaches. We agree there is a need to temporarily focus on endangered species. Lack of habitat management is one of the key factors in the decline of wildlife. In the long term we should pursue an approach that encourages management for ecological process and ecosystem function. This would be able to attract funding from environmental markets – which is currently a challenge with a feature-based approach.

1. How would you characterise the overall experiences of CLA members who manage respectively protected sites and protected landscapes?

Many CLA members take pride in the nature recovery taking place on their land. However, managing designated areas comes with many unnecessary challenges, including:

- A lack of support through funding opportunities and advisory services.
- Excessive restrictions on activities which can take place in a designated area, often creating a barrier to running a sustainable and viable business.
- Poor engagement and communication from NE and other UK Government authorities. Some CLA members have had a positive and collaborative experience working with NE in protected areas, but it takes time, persistence, and motivation. More often, CLA members, particularly within SSSIs, have had poor experiences resulting in deterioration of the SSSI.

2. How does the regulatory regime directly governing protected sites (e.g., SSSIs) and landscapes (e.g., national parks) affect CLA members' management of the land and help or hinder their efforts?

Nature recovery and preservation of natural beauty in designated sites and landscapes depends on land managers and farmers actively maintaining them – this is often forgotten. Business viability requires a viable flow of funds, from diversified farming businesses, to be able to afford to maintain and enhance landscape and biodiversity. Yet too

often CLA members experience severe limitations on their activities due to planning policies.

“Operations Requiring Natural England’s Consent” (ORNECs) prevent many activities from taking place on an SSSI. The uncertainty over what activities will be permitted under the ORNECs presents particular difficulties for land managers having entered or wishing to enter government funded land management and other schemes, as they cannot be sure that they will be granted permission to carry out the activities they have been granted funding for.

3. How effective are wider policies, such as ELMSs, in supporting CLA members’ efforts?

- a) In oral evidence, the two farming representatives referred to reductions of funding in practice and expected under ELMSs and other farm support, including for activities which could help improve the conditions of protected areas. Any national level statistics or commentary around trends you can provide on this would be gratefully received.**

Designation should be a path to unlock funding and long-term alternative revenue streams for conservation management. The CLA would like to see funding for activities which enhance the condition of protected sites, as well as a transition funding (i.e. compensation) for land managers for income foregone. The current level of funding for farmers and land managers within an SSSI through Agri-Environment Schemes is considered by many CLA members to be inadequate, for a number of reasons:

- The phasing out of BPS leaving some landowners with a funding deficit.
- The income provided under Countryside Stewardship (and previous Environmental Stewardship) and Sustainable Farming Incentive is insufficient to maintain a viable business, particularly in the uplands
- The difficulty in generating income within a SSSI in a way that is compliant with NE’s management plans for the site

New schemes would work for designated areas if they included:

- Longer term agreements with commitment to funding and targeted options specific to SSSI requirements
- Regular review of payment rates to take inflation into account.
- Streamlined application process that consider the complexity of AONB and SSSI management especially where common land is involved.
- Bonuses and supplements for collaborative schemes
- Funding for advice and facilitation to build skills and knowledge of managing these areas.

If the designation of a protected site commences after the annual application window for Higher Tier Countryside Stewardship closes, a funding vacuum is created, potentially delaying funding agreements to improve the site by up to two years.

b) How could engagement with farmers and other land managers by the UK Government and relevant statutory bodies like Natural England regarding the management of protected areas be improved?

Engagement should be proactive rather than reactive. Designations are currently seen by landowners and land managers as a negative and something to be resisted. The challenge for government is to transform the perception and reality of designation to something positive. To do this, the UK Government and NE must:

- Discuss trade-offs or negative impacts from designations candidly and openly from the start. Trade-offs must be informed by social and economic impact assessments, as well as consideration of these impacts alongside scientific evidence in the designation decision.
- Have an independent body review the scientific evidence used to justify designations and ORNECs.
- Work with landowners and land managers to discuss long-term management plan, before the designation is confirmed. Allow landowners and land managers to present proposals for how they could meet the nature recovery objectives on the site through designation or other means.
- Have agreements on ORNECs in place ahead of a designation confirmation, to allow landowners and land managers to know what activities they can do on their land, and therefore plan for the future.