

UPLANDS ELS: KEY QUESTIONS

(Last updated: 11 August 2008)

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PART 1 – INTRODUCTION

1.1 The Government has confirmed that the Hill Farm Allowance will be replaced in 2010 with an uplands strand of the entry level Environmental Stewardship scheme, known as “Uplands ELS”. This document outlines our current proposals for Uplands ELS, and seeks views on a number of key design issues. Written responses are invited by **Wednesday 17 September 2008**.

1.2 Parts 2 and 3 outline the objectives and principles of Uplands ELS and its broad shape (with specific detail about the proposed options and requirements in [Annexes A and B](#)). Part 4 asks questions about specific design issues for Uplands ELS. Details about when and how to respond are summarised in [Part 5](#). A [glossary](#) is also included.

[Background](#)

1.3 The English uplands are internationally recognised for their biodiversity and as a highly valued part of our natural heritage. They deliver significant ecosystem services, and benefits arising include recreation and sporting use, climate change mitigation & adaptation, food & livestock production, historic environment, supporting rural communities, water quality and flood mitigation. Upland farmers and land managers play a crucial role in this, and the Government has committed to rewarding them for the delivery of environmental and landscape benefits not provided by the market.

1.4 The Government currently provides specific support to hill farmers in the English uplands through the Hill Farm Allowance (HFA), in recognition of the greater difficulties they face in farming these areas. However, the HFA does not deliver the best value for tax payers' money, since it is a compensatory payment not directly linked to the delivery of public benefits.

1.5 Uplands ELS will allow us to explicitly recognise the key role that upland farmers play, whilst also better targeting the funding towards the delivery of environmental and landscape benefits. This is consistent with our wider policy on agriculture, whereby we rely on the market place to produce a competitive industry and for the Government to reward land managers for delivering public benefits not provided by the market (as well as by improving skills, ensuring better regulation, reforming the CAP etc).

1.6 Defra has worked closely with Natural England and stakeholders, including through a hill farmers' panel¹, to develop proposals for Uplands ELS. We are continuing to consult on these proposals over the summer, so that they can be finalised in Autumn 2008. To do this, Defra and Natural England will be meeting with hill farming communities in late August and early September to outline the proposals and seek their views². We are also testing the proposals on a number of hill farms across England to ensure they are practical and achieve our objectives. (An evaluation carried out during the recent review of progress of Environmental Stewardship has shown that concerns that it is harder for upland farmers to get in to ELS than their lowland counterparts have proved to be largely ill-founded).

1.7 The aim of this informal document is to enable stakeholders to respond in writing to a number of key design issues for Uplands ELS³. The results will be critical in helping us refine the proposals later this year, including the impact assessment. Although aimed primarily at stakeholder organisations, views are welcome from anyone wishing to respond by the closing date of 17 September 2008.

1.8 The Government will announce the final proposals for Uplands ELS later this year, subject to agreement from the European Commission for the necessary changes to the Rural Development Programme for England (RDPE).

¹ Including the NFU, CLA, National Trust, RSPB, TFA, FWAG, English National Parks Authorities Association and Environment Agency. The Hill Farmers' panel additionally included the NSA, NBA, Dartmoor Commoners Council and the Federation of Cumbrian Commoners.

² For further information about the meetings, go to www.defra.gov.uk/rural/uplands/default.htm

³ Defra consulted formally on the future of uplands support in 2006. The consultation document and a summary of the responses can be found at <http://www.defra.gov.uk/rural/uplands/consultation/index.htm>.

PART 2 – UPLANDS ELS OBJECTIVES & PRINCIPLES

2.1 Strategic Policy Objective

As part of Environmental Stewardship, Uplands ELS will contribute towards securing widespread environmental benefits – along with Entry Level Stewardship (ELS), Higher Level Stewardship (HLS) and Organic Entry Level Stewardship (OELS).

Within this context, our strategic objective for Uplands ELS is to maintain and improve the biodiversity, natural resources, landscape and historical values of England's uplands⁴, and to contribute to climate change mitigation and adaptation, by supporting the land management practices which deliver these benefits.

2.2 Rationale for Intervention

The rationale for providing specific support through Uplands ELS is to secure public goods on a landscape scale additional to those delivered by ELS⁵ by encouraging large numbers of upland farmers and land managers to deliver simple yet effective environmental management in the uplands. This is in recognition of the significance of these areas to delivery of a wide range of public benefits and the critical role that farmers and land managers continue to play in this, in particular through extensive livestock grazing.

Explanation: Extensive livestock grazing – by both cattle and sheep – has played a crucial role in shaping the upland landscape, which is internationally recognised for its biodiversity, as well as its significant landscape, archaeological, recreational, economic⁶, cultural and natural resource values.

Market forces and recent changes to agricultural support structures have had a significant impact on livestock farming in general and upland farming in particular. Government has made a clear commitment that in the future public support for upland areas will be clearly linked to the delivery of public benefits. As a result Uplands ELS will not attempt to address the impact of market changes but will instead seek to support – as part of a wider agri-environment suite of schemes – those land management practices which deliver the environmental and landscape benefits that the market does not reward.

This will be done in the context of a wider Government vision of farming in the future that is profitable, innovative, self-reliant and competitive (domestically and internationally); known for the quality, safety, and environmental and animal welfare standards of its products; embraces its environmental responsibilities as essential to its long term economic success and makes a positive contribution to our environment; and works together in partnership to meet the challenges it faces, in which responsibility for decisions affecting it and the costs of managing those risks are fairly shared.

Uplands ELS will be consistent with the objectives under Axis 2 of the Rural Development Programme for England, and will build on existing environmental

⁴ For the purposes of this document, the uplands are defined as the Severely Disadvantaged Areas in England.

⁵ And, therefore, that goes beyond the Single Payment scheme requirement to meet cross compliance

⁶ Including the contribution to tourism and the wider rural economy

standards. As a strand of ELS, it will contribute to the delivery of ES objectives (including under-pinning HLS).

2.3 Specific Objectives

Uplands ELS, if taken up across large areas of the uplands, will contribute to the delivery of ES objectives by addressing:

- Upland resource protection – including water quality and soil erosion
- The condition of upland habitats and biodiversity
- The character of the upland landscape and the historic environment
- Conservation of genetic resources (as a conservation tool)
- Climate change mitigation and adaptation

2.4 Uplands ELS Principles

We have designed Uplands ELS in accordance with the following principles. The italicised principles are still being refined.

Accessibility

- Open to all upland farmers and land managers, with guaranteed acceptance providing all scheme requirements can be met
- Whole farm scheme
- Targeted at those carrying out the land management
- Sufficiently flexible to allow farmers to adapt to future policy and market changes, whilst still delivering environmental and landscape benefits
- Seeks to secure long term behavioural changes by promoting enhanced farmer/land manager engagement in environmental management (through Environmental Stewardship)

Administration

- Simple to administer, with minimum amount of paperwork
- *[Role of advice – still to be determined]*
- Maximises wider public benefits (such as socio-economic benefits) through cross-cutting linkages and multi-objectives

Payment rates

- Reflect income foregone and costs which also recognise the higher costs of farming in the uplands where they occur
- *[Use of variable payment rates by land type or farm size – still to be determined]*
- *[Inclusion or not of small scale capital works – still to be determined]*
- *[Supplement for common land reflecting the additional costs of securing agreement on such land – still to be determined]*

Structure

- Must facilitate effective delivery of scheme objectives
- Fully integrated within ELS as an **optional** and **supplementary** strand (i.e. additional suite of options/requirements) available to SDA farmers
- Land managers need to be in ELS to access Uplands ELS

PART 3 – CURRENT PROPOSALS FOR UPLANDS ELS

3.1 Outline

Uplands ELS will be an additional and supplementary strand to ELS, open to all upland farmers and land managers in England’s Severely Disadvantaged Areas (SDA), providing they meet the eligibility rules. This means that, as with ELS, acceptance will be guaranteed subject to meeting the rules (as opposed to HLS, which is competitive).

As a strand of ELS, Uplands ELS sits within ELS rather than being a separate scheme. This means that the basic principles governing ELS must also apply to Uplands ELS. For example, it will follow the ‘whole farm’ approach by requiring farmers enter all their SDA land into Uplands ELS⁷.

ELS will be a requirement for entry in to Uplands ELS, since ELS is an integral part of Uplands ELS⁸.

3.2 How many points will be needed?

Under the approach being tested, farmers and land managers will need to earn a target number of points by carrying out specific environmental management. As with ELS, the number of points farmers will need to obtain is determined by the area of SDA land on their holding, and the categories of that land.

This approach combines the existing points target for ELS with the proposed points target for Uplands ELS, to make **one overall target** for the holding (i.e. covering both ELS and Uplands ELS).

Table 1: Proposed points requirements for Uplands ELS

Land category	ELS: existing points/ha target	Uplands ELS: proposed points/ha target	Total ELS + UELS points/ha target
SDA moorland parcels 15ha & above	8	12	20
SDA moorland parcels below 15ha	30	33	63
SDA land below the Moorland Line	30	33	63
Non-SDA land ⁹	30	not eligible for Uplands ELS	30 (ELS only)

Under ELS, farmers and land managers need to achieve 30 points for every hectare of their holding that is either below the moorland line (i.e. lowland or land in the Disadvantaged Areas) or in parcels of less than 15 hectares above the moorland line. They need to achieve 8 points for every hectare above the moorland line in parcels of 15 hectares or more. This is shown in Table 1 (in the second column).

⁷ Commoners will enter their own farm separately from the common itself.

⁸ A possible exception to this requirement for common land is under consideration – see Section 3.

⁹ Excluding the small amount of DA land above the moorland line, which requires 8 points/hectare and is not eligible for Uplands ELS.

For Uplands ELS, the approach that we are testing requires that farmers **also** achieve a further 33 points for every hectare of SDA land that is either below the moorland line or in parcels of less than 15 hectares above the moorland line; and a further 12 points for every hectare above the moorland line (in parcels of 15 hectares or more). This is **additional** to the points already required under ELS.

Table 1 sets out these target thresholds for ELS and Uplands ELS. As farmer and land managers wishing to go in to Uplands ELS will need to be in ELS, the combined total in the last (shaded) column shows the total points that they would need for every hectare on their holding.

3.3 How will these points be obtained?

Farmers and land managers will be able to obtain these points by meeting a series of *requirements* and through selecting from a menu of land management *options*. Each set of requirements and different options will be worth a number of points.

The requirements are specific farming practices that the farmer *must* meet on all SDA land in their holding. There are different requirements for the different SDA land categories – including additional requirements for common land and shared grazing above the moorland line.

The requirements will contribute 12 points for every hectare of SDA land in the holding. (This means that on moorland land parcels of 15 hectares and above, all of the 12 points needed in total for the additional Uplands ELS strand can be obtained by meeting the requirements). The proposed requirements are set out in detail in [Annex A](#).

The remaining points needed to reach the target for the holding will be achieved through selecting from a menu of options which will provide points towards the target. These options can be chosen from both the existing suite of ELS options and from a new set of Uplands ELS options. Under the approach currently being tested, these points can be obtained anywhere on the holding. [Annex B](#) sets out the proposed new options.

A number of upland farmers and land managers will already be carrying out some of the requirements and/or options. Like ELS, however, Uplands ELS is intended to reward existing good practice as well as encouraging improved management.

3.4 How much would this be worth?

Under the approach being tested, upland farmers and land managers would receive a flat rate payment through ELS and Uplands ELS of **£20/hectare, per year, for moorland parcels over 15 hectares** and **£63/hectare, per year, for all other SDA land** (and a further £30/hectare, per year, through ELS-only for non-SDA land). This is the **combined total** for both ELS and Uplands ELS.

N.B. The points and payment rates may change. As required by European legislation, the payment rates are based on the income forgone and costs incurred in carrying out the environmental management required. Further changes to Uplands ELS options and requirements may therefore mean a re-calculation of some of these payment rates. However, we expect the rates proposed will be broadly similar to the final rates.

PART 4 – KEY QUESTIONS ABOUT UPLANDS ELS

4.1 Detailed proposals – options and requirements

The current proposals for the options and requirements in Uplands ELS are set out in [Annexes A and B](#).

Questions:

- 1. Do you have any specific comments to make on any of the proposed options or requirements?*
- 2. Are there further options or requirements that you could suggest?*
- 3. Do you feel the proposed options and requirements are set at an appropriate level for a strand of ELS – for example, do they reach the right balance in terms of delivering environmental and landscape benefits (including existing good management) whilst not being so difficult as to discourage uptake?*

4.2 Payment cap or taper & minimum farm size

As well as being limited only to beef and sheep producers, the HFA pays at full rate for land up to 350 hectares; at half rate for 350–700 hectares; and nothing over 700 hectares. It also does not pay on holdings under 10 hectares. These rules were originally intended to focus HFA payments on full-time beef and sheep farmers and prevent very large moorland farms receiving too great a proportion of the HFA budget.

In contrast, the objective of Uplands ELS is to reward the delivery of landscape and environmental benefits, regardless of who delivers them and what type or size of farm they may have. This is based on the fundamental principle under Environmental Stewardship where compensation is paid for the income forgone and costs of delivering public goods. As such, ELS has no maximum or minimum thresholds, and is paid on every hectare entered in to agreement. We are minded to adopt the same approach for Uplands ELS, by paying the full rate for all land under agreement – with no payment taper, cap or minimum farm size. This is consistent with our objective of keeping Uplands ELS simple.

Removing the cap, taper and minimum farm size, and opening up eligibility to dairy holdings will result in some limited re-distribution of current uplands funding support away from farms between 10–350 hectares and towards farms over 350 hectares, under 10 hectares¹⁰ and dairy holdings.

Modelling suggests that imposing a payment cap and/or taper would reduce payment rates by roughly £0.80–£1.50/hectare on moorland, and £2.00– £3.50/hectare on non-moorland (depending on whether a cap, taper or both was applied).

Questions:

- 4. Do you agree that Uplands ELS payment rates should be the same for all land under agreement, regardless of farm size?*
- 5. If a cap or taper was put in place, should it apply to common land?*

¹⁰ Although evaluation of ELS shows that smaller farms are less likely to enter ELS, and while our intention is that Uplands ELS is open to all we would expect to see a similar response.

4.3 Capital works

We recognise that some uplands features not covered by existing higher level agreements, and which do not necessarily require detailed management, could benefit from the protection or conservation afforded by some simple capital works – such as walling. Some form of capital works support could be beneficial where locally important landscape features are present but not included in HLS target areas. Research also shows that capital works in the uplands also have wider socio-economic benefits (e.g. local employment, maintaining traditional skills and tourism).

However, at this stage we are not proposing to provide a specific capital grants in Uplands ELS. Bearing in mind the ‘hands off’ nature of ELS (and Uplands ELS), there are few capital works in the uplands which could be carried out without the need for site-specific advice and without the possibility of damage to the environment if not applied correctly. Furthermore, capital works (such as buildings) can be expensive to fund, so a relatively small number of agreements can have the potential to absorb a significant proportion of the available funding. Although other capital works (such as dry stone walling) may be cheaper, they can be extensive and similarly absorb a significant proportion of the budget. Some stakeholders have expressed concern that, given the limited funding available, a capital works grant scheme would reduce the basic Uplands ELS payment rate.

We are, however, testing the inclusion of a small number of capital works as one of the available *options* within Uplands ELS (see [Annex B](#)). These would be given a points value like other options, which would be divided over the five years of an Uplands ELS agreement as part of the annual payment (rather than an additional grant payment). We would impose a limit on the proportion of points that could be achieved using these options.

Such an approach would allow us to provide some degree of capital works funding – albeit at a much reduced level – whilst contributing towards overcoming the budgetary difficulty of a grants scheme, as well as increasing the options available to farmers. It would also be administratively more efficient than a grants scheme

Capital grants will continue to be available in the uplands through HLS (and some ESA agreements), and through the small scale capital grants scheme provided under Defra’s Catchment Sensitive Farming Initiative. Any future changes to ELS which may involve capital works will need to be consistent with Uplands ELS.

Questions:

6. *Do you agree that Uplands ELS should not include a separate capital grants scheme?*
7. *Do you have any views on whether it should include limited capital works as an option, with payment being included within the basic Uplands ELS rate?*

4.4 Landlord/tenant issues

Like ELS, Uplands ELS will require a five year commitment from the applicant, who must have management control of the land for that time. This ensures that the requirements and options can be delivered over the five year period – which is necessary under EU rules and to achieve sustainable land management and value for money.

This differs from the HFA, which as an annual scheme is open to anyone farming the land for the year in question. The move to ELS may provide a barrier to entry for those short term tenants who would be unable to access Uplands ELS on that land, unless they had their landlord's agreement to a five year commitment.

This is a national issue for agri-environment schemes, rather than specific to the uplands. We have, however, designed Uplands ELS to target, as far as possible, the person carrying out the management of the land. For example, the proposals include a requirement for a minimum stocking level on moorland.

We recognise that a farmer renting land as a short term grass let (typically less than 365 days) is unlikely to be able to enter that land in to Uplands ELS, because of the nature of the tenure. However, evidence shows that this land covers only 3.5% of the area eligible for Uplands ELS¹¹. The three year rollover of the HFA (from 2007 – 2009) gives farmers time to adapt their business practices if they wish to be eligible in the future.

Question:

8. *Can you suggest further ways for targeting Uplands ELS at the land manager, which also meet the requirement to have management control of the land for 5 years?*

4.5 Uptake of Uplands ELS

We are seeking landscape-scale coverage of Uplands ELS in order to achieve the objectives, and we recognise the importance of ensuring that it is sufficiently attractive to farmers to achieve this. Approximately three quarters of SDA land is already in some form of agri-environment agreement (including classic schemes).

Question:

9. *Would you expect this level of coverage to increase much with the introduction of Uplands ELS? By how much?*

4.6 Providing advice to farmers to enter Uplands ELS

ELS is a 'hands off' scheme, open to all farmers, with national options applying to the generality of farmland. There is currently no provision for advice to be given to farmers on an individual basis to assist their entry in to the scheme. Some limited assistance is provided through the conservation advice contracts that Defra and Natural England operate, usually via farmers meetings and farm walks.

Evaluation of Environmental Stewardship has shown that livestock farmers often require some additional targeted advice to help them join ELS. A key recommendation from the recent review of progress of Environmental Stewardship was: *'Develop a significantly enhanced, geographically differentiated, programme of advice to support ELS delivery and secure the funding necessary to implement.'*

There may be some flexibility for Uplands ELS to develop its own level or type of advice providing it remained broadly consistent with ELS, fitted within the available budget and

¹¹ June 2006 Agricultural and Horticultural Survey

with Natural England's IT and delivery constraints. This would (a) provide greater scope for new options or requirements being included within Uplands ELS; (b) help those farmers not yet engaged in any agri-environment scheme access ELS and Uplands ELS; and (c) encourage greater farmer understanding of the scheme and hence deliver better value for money.

Questions:

- 10. Do you think there is a need for an enhanced level of advice for helping upland farmers enter Uplands ELS?*
- 11. Do you have a view on the method for delivering that advice?*
- 12. If some limited on farm advice was made available for UELS applicants, who should be the priority to receive it (e.g. expiring classic scheme agreement holders, those not in any agri-environment scheme, commons, the most remote farms etc)*

4.7 Common land

Over 80% (307,000 hectares) of England's common land is in the SDA, making up 18% of the land eligible for Uplands ELS. A significant proportion of this is designated as Sites of Special Scientific Interest (SSSIs), or lies within a national park or an Area of Outstanding Natural Beauty (AONB). In view of the significant environmental and landscape values generally attached to common land, it is essential that Uplands ELS caters for common land to encourage its active management.

Like other agri-environment schemes, a single Uplands ELS agreement would apply to the entire common (or group of commons), and would require the support of the working majority of common rights-holders and the landowner. This is necessary to ensure sound environmental management of common land, and to meet EU requirements. A commoners' association or commons council would be responsible for the agreement, for compliance with it and for distribution of payments.

4.7.1 Reducing barriers to uptake on common land

We recognise that there is greater complexity involved in bringing common land into agri-environment agreements than with other land, due to the need to achieve agreement amongst commoners and the landowner. One possibility to help overcome this could be for Natural England to provide extra advice to the commoners and landowner as part of the application process. This could include, for example, a meeting with the commoners' association or commons council to discuss Uplands ELS and the potential implications for the common.

Stakeholders have also asked that we provide additional guidance for commons wishing to enter Uplands ELS to help facilitate the application process. For example, the guidance could stress the crucial role of the active commoners in ensuring the common continues to deliver environmental and landscape benefits, or include a model framework for the distribution of funds amongst the active commoners.

We are also exploring the possibility of paying an extra supplement for commons to recognise the additional costs involved in reaching agreement on a group application, similar to that already provided in HLS. Such a payment would help to foster the collective management of commons and maintain a cultural tradition of collaboration.

This could be a one-off payment, or an annual payment which recognised the ongoing administrative costs of collaboration.

However, it should be noted that total payments to commons are expected to *increase* under Uplands ELS, in comparison to the HFA. This is due to the different methods of allocating payments. In addition, a supplementary payment would slightly reduce the overall payment rate for Uplands ELS (given limited funding). This would not be a significant reduction as many uplands commons will already receive a group application supplement (at least for the first year) through HLS rather than Uplands ELS. Alternatively, any supplement for commons could be paid through ELS rather than Uplands ELS – although this would only be possible if the common was in ELS.

Under current ELS rules, the landowner's participation is needed for agreements on common land, in particular, to ensure the delivery of the key moorland management option that requires the landowner's active involvement (e.g. for bracken control, burning and drainage). This is particularly relevant on commons where the landowner plays an active role in the management of the common. Some stakeholders have raised concerns that landowners consent and participation may be a barrier to entry for Uplands ELS on those commons where the land owner is not prepared to sign or is absent/ not known.

Questions:

- 13. Can you suggest any other ways to reduce the barriers to the uptake of Uplands ELS on common land, whilst complying with the requirement for a single agreement per common (or group of commons)?*
- 14. What could guidance from Defra or Natural England usefully include to help bring common land into Uplands ELS?*
- 15. Should a supplementary payment be made to commons to recognise the additional costs they face? Should it be a yearly payment, or only for the first year of the agreement?*
- 16. To what extent might the requirement to obtain the landowner's consent be a problem for commons entering an Uplands ELS agreement? Can you give any examples of difficulties in obtaining the land owner's consent for other agri-environment schemes? Is this a problem in any particular region? Would removing this requirement from Uplands ELS be prejudicial to the delivery of environmental benefits under the agreement where the landowner controlled those activities?*

4.7.2 ELS and Uplands ELS on common land

Uplands ELS is a supplementary strand to ELS, rather than a stand-alone scheme, and has been specifically designed to sit alongside ELS to enhance the public benefits delivered. Therefore farmers will need to either already be in ELS, or go in to ELS when they enter Uplands ELS. We are exploring a possible exception to this for common land, should a suitable case be made for doing so. This arose from concern from some stakeholders that it would be more difficult for commoners to reach internal agreement amongst themselves on both ELS and Uplands ELS (including agreement on the distribution of the payment between active and inactive commoners).

We are currently minded not to make such an exception, because Natural England are relaxing the rules for commons to enter ELS (relating to commoners' agreement). Uplands ELS is integrally linked to ELS rather than being a separate scheme, and it

would be difficult to make an artificial distinction for common land (as well as the associated administrative complexity). Being in ELS would provide benefits to the commoners through access to higher payment rates (including a possible commons supplement, which could be attached to ELS rather than Uplands ELS), and would potentially justify an enhanced level of support from Natural England. Although commoners in any case will need to agree amongst themselves how the payments are distributed, Government intends to issue guidance emphasising our objective that the payment goes to active commoners to reward them for their land management.

Question:

17. *Do you agree that commons should not be exempted from the requirement to be in ELS in order to access Uplands ELS? If you disagree, please explain your reasons.*

4.8 Other issues

Some design issues associated with Uplands ELS have already been finalised, where flexibility has been limited in pursuing alternative approaches (e.g. due to EU requirements, administrative complexities or consistency with Environmental Stewardship). These are outlined below for completeness.

4.8.1 Transitional arrangements

A number of upland farmers will still have ongoing agreements under the closed Environmentally Sensitive Area (ESA) or Countryside Stewardship (CSS) schemes that will still be running after Uplands ELS is introduced in 2010. As a result, some or all of their land may not be eligible for Uplands ELS. We are exploring transitional arrangements for these people, to avoid penalising these early adopters of agri-environment schemes.

4.8.2 EU legislative basis for Uplands ELS

As part of the Rural Development Programme for England, the implementation of Uplands ELS as a replacement for the HFA will require us to amend the Programme. Uplands ELS will operate under the agri-environment measure of the EU rural development legislation (Article 39 of Council Regulation 1698/2005).

This differs from the HFA, which operates under the Less Favoured Area measure (Article 37). However, any transitional arrangements for classic scheme agreement holders are likely to continue to be based on this measure.

The ongoing review by the European Commission of the Less Favoured Areas measure is not expected to affect the Uplands ELS proposals, or any transitional arrangements.

4.8.3 Tailoring Uplands ELS to reflect local circumstances

This would involve a move away from a single national menu – as under ELS – to provide targeting of options and requirements to suit the specific circumstances or objectives of the different upland areas (e.g. by varying minimum stocking levels in different parts of the country throughout the year).

Although such an approach was initially attractive in recognising the variations in the different upland regions, we have concluded that the administrative costs and

complexities outweigh the additional public benefits it might deliver. In particular, the IT and administrative complexities proved difficult to overcome without excessive cost. We therefore do not intend to provide localised or regionalised options or requirements under Uplands ELS.

The proposed requirements have been developed to be applicable across all upland areas, as with the majority of the options. We do, however, propose that advice provided by Natural England to help farmers enter Uplands ELS is tailored to suit the local circumstances. This is consistent with the conclusions of the wider review of the progress of Environmental Stewardship.

PART 5 – HOW TO RESPOND

5.1 Deadline for replies

Replies should be received in writing by **Wednesday 17 September 2008** by either post or e-mail (please use only one) to the following address:

Email: theuplands@defra.gsi.gov.uk

Post to: Uplands & Commons Policy Team
Department for Environment, Food and Rural Affairs (Defra)
3C Nobel House
17 Smith Square
London SW1P 3JR

5.2 Detail of replies

To facilitate analysis of responses, please ensure that your comments indicate clearly the numbered question to which they relate. To help us analyse responses, it would be helpful if you would indicate:

- a) whether you are responding on behalf of an organisation. If so, which people and/or organisation you represent
- b) the general nature of the your interest, your organisation or your business (for example, farmer, landowner, environmental interest, voluntary sector etc)
- c) if your response is being given from the perspective of a particular region, and, if so, which region.

All replies will be acknowledged.

5.3 Publication of replies

This document is being sent to organisations who have expressed an interest in the development of Uplands ELS. We would also welcome responses from individuals. Please feel free to forward it to anyone else who might be interested. This is not a formal consultation document, but views expressed will be fed in to our policy development.

In line with Defra's policy of openness, copies of the responses we receive may be made publicly available through the Defra Information Resource Centre, Lower Ground Floor, Ergon House, Horseferry Road, London SW1P 2AL. The information they contain may also be published in a summary of responses.

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GLOSSARY

CSS	Countryside Stewardship Scheme
DA	Disadvantaged Areas
Defra	Department for Environment, Food and Rural Affairs
ELS	Entry Level Stewardship scheme
ES	Environmental Stewardship
ESA	Environmentally Sensitive Area
Ha	Hectare
HFA	Hill Farm Allowance
HLS	Higher Level Stewardship scheme
LFA	Less Favoured Areas
RDPE	Rural Development Programme for England 2007–2013
RPA	Rural Payments Agency
SDA	Severely Disadvantaged Areas
SSSI	Site of Specific Scientific Interest
Uplands ELS	Uplands Entry Level Stewardship