



BRECKLAND FARMERS WILDLIFE NETWORK

Enhancing Biodiversity in the Brecks

RESPONSE FROM THE BRECKLAND FARMERS WILDLIFE NETWORK TO THE OEP'S CALL FOR EVIDENCE ON IMPROVING NATURE, AUGUST 2023

About the Breckland Farmers Wildlife Network

The [Breckland Farmers Wildlife Network](#) (BFWN) is a farmer-led group collaborating to create a landscape scale wildlife network. It's been pointed out that we're the largest farmland cluster in lowland UK. We have almost 60 members and we cover in excess of 45,000 hectares of farmland in the Brecks, a very special area for agriculture and food production but also home to a huge range of species, many of which are found nowhere else in the UK.

The Brecks (or Breckland) in East Anglia covers almost 400 square miles. It is a truly unique landscape in terms of its special and well-documented wildlife, which has captured the interest of naturalists for generations. Importantly, with the right management the Brecks' flora and fauna can exist alongside productive farming and forestry. The farm business members in the Breckland Farmers Wildlife Network produce meat (sheep, pigs, poultry and beef), vegetables (onions, potatoes, carrots, asparagus), herbs, grain (wheat, barley, oats), sugar beet and oilseed rape. Increasingly land is also being used to produce green energy through biofuels, such as maize and miscanthus, and fixed point generation.

Our vision is to build an ecologically significant, science-based and landscape scale, seamless network of habitats linked through farms, between sensitive sites, and through areas of high value agriculture.

Our input to the OEP call for evidence

The points we make below are based on many years' experience of farming in the Brecks, but we believe they have general applicability for all land managers seeking to run economically viable farming operations whilst playing their part in protecting and enhancing biodiversity.

1. **FUNDING:** A firm commitment to long term funding for nature as part of the government's new Environmental Land Management schemes is required to provide the necessary stimulus and certainty for businesses to make wildlife friendly decisions about how they manage their land. Intensive agriculture can work alongside thriving biodiversity but funding for nature needs to be competitive with income from food production and alternative land uses, and take account not only of income foregone, but also the costs associated with the interventions required by the agri-environment scheme options, and reflect the value of the habitat in recovering nature.

For example, in the Brecks modelling by the University of East Anglia has generated mapping to target the optimal locations for uncropped cultivated margins (option AB11 in Countryside Stewardship) across the landscape to form a network that maximises the benefits to a high percentage of the region's priority species¹. Where margins are created and managed

¹ <https://brecklandfarmerswildlifefnetwork.org/defra-test-and-trials-report-2020-21/>



appropriately, they provide ideal habitat for rare plants, invertebrates and bird species such as turtle dove and thus can play an important role in nature's recovery. Although such margins have proven wildlife benefits, land managers will be reluctant to select this option where it is uncompetitive with cropping and land rental values, and entails additional resources in terms of labour and machinery which are not adequately accounted for².

The decision from DEFRA to evolve the Countryside Stewardship scheme rather than replace it with the proposed Local Nature Recovery scheme is a welcome one. Mid Tier Countryside Stewardship has the potential to support the recovery of farmland biodiversity at scale through the establishment and management of scheme options over the course of a 5 year agreement. However, priority habitat creation and tailoring of option prescriptions for target species, alongside support and advice from Natural England advisers is restricted to Higher Tier Countryside Stewardship. It is unclear whether it is an issue of direct lack of funding for schemes, or lack of funding for resource to deliver schemes, but the scoring threshold for Higher Tier this year (set at 15,000) saw many farms turned away from the scheme. How can we expect to reverse the decline in nature when so many of those that are wanting to do it are turned away by DEFRA? It will not only be those individuals whose applications scored less than 15,000 points this year that are unable to meet their environmental ambitions, but also those future applicants who dull their ambitions to align with Mid Tier, assuming there is no point in striving for Higher Tier only to be turned away, bearing a significant cost for application advice and support.

We acknowledge that there is a role for private finance (see further comments below), and indeed many of our members are already looking into Biodiversity Net Gain, Nutrient Neutrality and carbon offsetting as alternative revenue sources, but with the relative nascency of these markets, reliable income from public sources will remain critical in the short to medium term. Currently there is a mismatch between the amount of public funding available and the need for urgent action if meeting the 2030 target to halt species decline is to be a realistic prospect, noting that ecological recovery timescales can be of many years' duration.

- 2. REGULATORY FRAMEWORK FOR MARKETS:** The swift roll out of robust carbon and nature market frameworks is critical to their success as a source of long term funding for nature recovery. The carbon market has a longer history than the market for biodiversity, but is still beset by issues of integrity, transparency and metric definition which makes it a difficult area for land managers to venture into.

BFWN members struggle to navigate the varying offers made by the numerous players in the carbon market, uncertain which metrics provide the most accurate data, and whether any given carbon analytics company is reputable and properly accredited. Members receive regular cold calls from companies offering their services, with little to no guidance as to their suitability. Participants in the carbon market are increasingly looking to biodiversity credits as the next phase in the development of green financial instruments, and this is expected to prove an even more challenging marketplace given the difficulty in pinning down suitable metrics that properly account for the complexity of biodiversity. All the issues besetting the carbon market are expected to play out more strongly when it comes to creating markets for wildlife.

² <https://brecklandfarmerswildlifefnetwork.org/final-report-for-the-defra-elms-test-trial/>



Currently the biodiversity market is centred around biodiversity net gain, which in November is expected to become a legal requirement of development planning consents under the Environment Act 2021. As it is the first regulatory vehicle, much welcome effort has been expended by DEFRA in defining a Biodiversity Net Gain Metric (currently in version 4.0), which in turn makes use of the [UK Habitats Classification](#). UK Hab tends to be the metric of choice for defining biodiversity and measuring its uplift, but it has its shortcomings and it is not clear whether this will become the market leader, or swiftly be superseded. This level of uncertainty poses a significant blocker to entry into the biodiversity credits market, and much more clarity is needed to encourage participation. The creation of yet another habitat classification system (in addition to Phase 1 Habitat Surveys, National Vegetation Classification, UK BAP Priority Habitats and those associated with agri-environment schemes) has added another layer of conservation jargon used and understood only by those willing and able to undertake costly training courses. To engage landowners and managers with nature recovery the language and approach must be made accessible to them, or at the very least retained for long enough that people have the chance to build familiarity. The design of UK Hab as a new system that is already on its second major iteration and seemingly accessible only to those willing to register as users creates a significant barrier to access and understanding.

3. **BIODIVERSITY DATA:** BFWN has been in the fortunate position of having access to the University of East Anglia's 2010 [Breckland Biodiversity Audit](#) which has provided the vital scientific underpinning to guide the mapping of optimal locations for cultivated margins and is now being used in BFWN's Landscape Recovery pilot project for further proposed habitat interventions. This aggregation of dispersed biodiversity records from numerous sources into a robust scientific report that groups species on the basis of their shared management requirements is a tool that has widespread application across the country. We would strongly recommend the encouragement of similar pieces of research to underpin species recovery in all the different geographies.
4. **ADVICE:** The provision of accessible, authoritative advice to guide farm businesses towards the optimum land use management choices that will deliver the most for nature's recovery is a vital part of the jigsaw, knitting together the science with the practical, on the ground interventions. As agri-environment schemes have become less locally tailored, there is an increased need for advice to help target options and management for local priorities. However, access to free, expert advice from Natural England has diminished. The role of local, trusted advisers providing ongoing advice to land managers should not be underestimated in the fight to halt species declines, however there is also a need for more accessible scheme and habitat management guidance. It is appreciated that gone are the days of hard copy, ring-bound scheme handbooks. However, rather than leaning into the opportunities that online only guidance presents, for example the use of photographs, diagrams, videos etc., DEFRA limits itself to text only guidance, catering for only one of the main learning styles. The reverse in the decline of nature is reliant not only on the uptake of agri-environment schemes, but on the optimal delivery and management of habitat options within them which heavily relies on the availability of quality advice and guidance.