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Set aside mitigation – Options for XCI

We concur with the Natural England's view that we should aim to get as much mitigation as we can from as small a land area as possible. For some time we have been suggesting that 1% of arable land might be sufficient if it is managed well. This means that two important conditions need to be met:

1. All XCI management options must be **better** than previous set-aside regimes.
2. Land under XCI rules must be distributed appropriately across the landscape so that as much wildlife as possible benefits from it.

If these two conditions are not met, wildlife benefits will be small and much larger areas of land would need to be committed.

Considering the management options EM1-11, actually only the first four meet our two conditions. The rest either seasonally too short or are crop modifications which do not substitute for set-aside at all.

EM1 & EM2: These are good set-aside substitutes, but effectively they are one and the same but in different places. They should be combined.

Management: Needs to be mown (or 2/3 mown) in late summer and or grazed in winter.

Distribution and size: They should not be restricted to along water courses, hedgerows or woodland edges. Plots in the open will be the best locations for many species. Remember many downland farms have no streams, hedges or woods. In fact this option should not be located next to woods at all - grass areas on the north sides of woods are valueless for most things. Except along proper water courses (i.e. permanent running streams) this option should be distributed in patches of about one hectare with a minimum dimension of 20 meters.

ELS top ups: The only sensible top-up for this management option would be points for re-seeding and establishing a diverse perennial herb-rich meadow. In the past, natural regeneration has often resulted in monotonous areas of Couch grass. Cutting and/or grazing should not be a top-up option but a management condition.

EM3: This a good substitute for rotational set-aside.

Management: There should be no pre or post harvest herbicide in the preceding crop and no other herbicide or pesticide used until mid May. Cultivation allowed after July 31.

Distribution and size: One hectare plots in every 100 hectares of cultivated land.

ELS top ups: Not wild flower and bird seed mixes (**EX4 EX5**) - effectively these should come under option **EM4**. Unharvested cereal from the previous crop (**EX7**) is sensible. Another alternative would be a short-term cover crop like mustard which can be hand broad-cast into the preceding cereal before harvest and will then last as green cover until the first frosts.

EM4: This is the wild-bird cover option for former set-aside. This is a valuable crop for birds in summer and winter - provided the right species are chosen.

Management: Mixtures of Kale, Quinoa, Millet, Triticale, Linseed, Sunflower and Teasel are all good and, in the right combination provide good habitat winter and summer. Options should not include Maize which really only suits released pheasants. There should be no restrictions on the use of pesticides or fertilizer – some of which may be essential to establish and maintain these crop.

Distribution and size: Plots or strips no smaller than ½ hectare. No strip less than 10 meters wide.

ELS top up: Given the extra management needed we think all of EM4 should be eligible under ELS wild-bird seed or wild-flower mixes (**EX4 & EX5**).

EM5: Not a suitable option. We have seen no data yet from SAFFIE to indicate that this is worthwhile.

EM6: Suitable as a valuable ELS prescription but no substitute for set-aside.

EM7: Not a suitable option. We see no wildlife value in this.

EM8: Not a suitable option.

EM9: Not as good as EM3 or former rotational set-aside. Therefore is not a suitable option.

EM10: Again, not as good as EM3 and is therefore not a suitable option.

EM11: While low input cereals may give a weedier stubble (I have seen no data), it will be lost by March 1st. In our view it is not as good as EM3 or former set-aside.

Other points:

The hungry gap: This was referred to the winter early spring period. In fact the hungry period for some species is the summer. For example hares have grazing everywhere throughout the winter so the hungry gap for them is in the summer when crops are long. Even for grey partridge, which can survive on cereal crops during winter, the lean months are in the summer when their chicks are short of insect food.

RPA additional workload: I was left rather unconvinced by the argument about the additional workload that this will impose on the RPA. Up until 2007 they would have to done virtually the same thing for recording set-aside areas anyway. I do not really see why they would need to map the different options. A random site inspection would verify whether or not XCI land was being managed according one of the options.

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