# Ilketshall St. Andrew and St. John Land Management Company

# Commons – Management Plan March 2023 – February 2024

The following sections outline the intentions of the Board of Directors of the Land Management Company (LMC) with respect to different aspects of the Commons. The Board of the LMC at the time of the preparation of this Management Plan are:

Tim Basey-Fisher (Chair) John Bedwell (Company Secretary) Gerald Godfrey Chris Roberts Roo Lee Rod Apps

Tim Basey-Fisher, Gerald Godfrey and Rod Apps have been nominated as Directors by the Commoners' Association. John Bedwell, Chris Roberts and Roo Lee have been nominated by the Parish Councils.

This document should be read in conjunction with the Annual Management Plans for previous years (available on the Commons website, <u>www.ilketshallcommons.co.uk</u>).

It must be recognised that the fulfilment of many aspects of the Management Plan will be dependent to some extent on weather conditions prevailing at different points in the year, and upon the availability of resources at the relevant time. It must also be recognised that the Management Plan is the starting point for the management of the Commons over the ensuing 12 months, and therefore that additional work may be completed as and when required. The LMC is fully accountable to DEFRA for the management of the HLS and ELS agreement and therefore has to follow strict rules and guidelines laid down by DEFRA. Due to this, it is important that no work is carried out on the Commons without the knowledge and approval of the LMC, as DEFRA may impose fines if any rules are broken.

### Section 1. General

#### **1.1** Long-term management of the Commons.

As a consequence of the Commons being 'open access' land under the terms of the Countryside Rights of Way (CRoW) Act, the management of the Commons has to reflect the interests of both Parishioners (and non-Parishioner) users of the Commons, as well as the Commoners. Following consultations undertaken in previous years, the LMC identified 10 long-term objectives for the management of the Commons in the Management Plan for last year (2022-2023). These 10 objectives are:

- 1. Maintain the Commons as predominantly open spaces constituting uncultivated grassland.
- 2. Secure sources of adequate long-term funding, to enable the Commons to be maintained indefinitely into the future in the same manner as the recent past.
- 3. Maintain the Commons in order that all Commoners will be able to utilise their grazing rights if they wish to do so.
- 4. Maintain and develop the hedges and scrub on the Commons on a long-term basis in order to maximise benefits for all wildlife.

- 5. Making use of advice from suitably qualified individuals, seek to maintain and develop the ponds on the Commons on a long-term basis as significant sources of wildlife diversity.
- 6. Create and maintain a tree coverage in corners and on boundaries of the Commons that is commensurate with the aim to maintain open spaces and grazing rights, but which also recognises the benefits of tree coverage in terms of its amenity and wildlife value, and as a contribution to sustainability.
- 7. Making use of advice from suitably qualified individuals, pursue an integrated approach to the enhancement of wildlife diversity through the management of the grassland, hedges, trees and ponds.
- 8. Use the Commons as a resource for education concerning the management of open spaces, ponds, hedges, etc. for varied groups, particularly as this may relate to funding opportunities.
- 9. Promote engagement by the community and the Commoners with the work of the Land Management Company, and secure a succession of people willing to act as volunteers for work on the Commons, and as Directors of the LMC.
- 10. Achieve an appropriate long-term balance between the use of the Commons by the community (including dog-walkers) and the protection and enhancement of wildlife.

The Board has reviewed these objectives, taking into account feedback from stakeholders, and concluded that there was no need to make any amendments to those objectives at the current time. It is believed that they will continue to provide a consensus view, across all individuals in both villages (and across both Commoners and parishioners) to guide the long-term management of the Commons. It should be noted that the sequencing of the objectives does *not* imply any prioritisation (and therefore that all the objectives with sufficient detail to be meaningful, but to avoid such a high level of detail that would constrain and limit the objectives in a manner that would not be appropriate for *long-term* objectives. It should also be recognised that changes in the funding arrangements for the Commons may necessitate some amendment to the objectives in order to meet the expectations of the funding providers.

#### **1.2** Incursions and encroachments.

The Commons have been in existence for a very long period of time, and the overwhelming majority of stakeholders want to see them continue indefinitely into the future. The Board therefore sees the preservation of the acreage as being a prime responsibility. To that end, the Board has previously made a commitment to seek to establish more precisely the boundaries of all of the Commons, and therefore to secure agreement as to the ownership of certain ponds, hedges, and areas, with the owners of properties adjoining the Commons. Work has progressed with respect to this project during 2022, with the majority of property owners contacted so far agreeing that the Land Registry map for their property accurately represents the boundaries on a number of properties where the owners have been contacted, and also to contact the remaining property owners with a boundary with Common land. It is hoped to complete this work in 2023.

The Board also previously stated that it would take a robust approach to any encroachment or incursion onto the Commons. As the Commons have no identified owner, the 'guardian'

of the Commons is the relevant local authority, and hence in the case of the Ilketshall St. Andrew & St. John Commons, this falls to the Parish Council. The Parish Council does not have the resources to initiate legal action to counter incursions or encroachments, and therefore the costs of such action falls to the LMC. At meetings held between the policing team responsible for the area and representatives from Parish Councils, the police have emphasised the need to take whatever steps are feasible to limit the possibility of incursions, and emphasised that the police will **not** become involved unless there are aggravating circumstances to warrant such involvement.

The Board therefore intends the LMC to maintain a substantial reserve of funds to pay for legal and other costs associated with incursions and encroachments if these occur. In the previous Management Plan, the Board proposed to allocate £30,000 of its existing funds as the amount for this purpose; it proposes the same figure for 2023-2024. The sum will continue to be reviewed on an annual basis.

#### 1.3 "Lawnisation"

Concern has been expressed to members of the Board regarding an increasing tendency for people to regularly mow areas of Common in front of their property, and hence convert them into lawns. An issue is that some of these areas are within the areas of the Commons covered by the ELS/HLS scheme and are therefore subject to restrictions on grass cutting, etc. In addition, all such areas are in any event areas of Common and share the purpose of encouraging wildlife and flora. The Board intends to consult with the residents concerned with a view to identifying how best to manage this issue.

#### 1.4 Funding

As at September 2022, the net funds held by the LMC constituted approximately £75,000.

The view of the Board is that adequate funding is crucial to the appropriate management of the Commons on a long-term basis. Cutting of the grass is necessary in order to avoid the Commons being overtaken by brambles, sallows, etc. In addition, maintenance of the hedges and ponds is necessary in order to promote wildlife, while maintenance of the ditches is necessary to deter incursions. All these (and other) activities require funding on a long-term basis.

In recent years, the income to the LMC has mainly come from three sources; the Basic Payment Scheme (BPS), the Entry Level Stewardship Scheme (ELS) and the Higher Level Stewardship Scheme (HLS). In approximate terms, the income from these sources constituted £11,300 in 2022, with £5,835 from the ELS/HLS and £5,447 from the BPS. This represents a reduction in income of approximately 10% (the figure in 2021 was £12,500), even before allowing for the impact of inflation. There was an additional £640 of income representing interest payments on investments in 2022.

The Basic Payment Scheme is being phased out, and will end completely in 2027. Payments are being progressively reduced, and therefore the income to the Commons from that source will also fall and end completely in 2027. By way of example, the income from the BPS is due to fall to £4,425 in 2023, and then £3,400 in 2024, relative to £7,215 in 2020.

The Rural Payments Agency had been trialling a number of alternative funding mechanisms to replace the Basic Payment Scheme, the Entry Level Stewardship and the Higher Level Stewardship in addition to certain other schemes. The majority of these trials were abandoned in October 2022, and it seems that the RPA therefore decided to implement a further extension to the ELS/HLS scheme. The LMC therefore received an invitation to extend its participation in the scheme for a further *five* years from 2023 (with the final

payment therefore being made in 2027), with the income fixed for each year at  $\pounds$ 5,836.10. It should be noted that the fixed amount of  $\pounds$ 5,836.10 will fall in real (inflation-adjusted) terms due to the impact of inflation.

After consultation with the Commoners and parishioners within the limited time available (the RPA required a response by the end of November 2022), the LMC decided to continue with its participation in the scheme. It was explicitly recognised that if it did not continue, the income from the ELS/HLS would immediately fall to zero, and with the BPS due to be phased out completely in 2027, the Commons would have no income whatever thereafter. The LMC will continue (along with its advisers) to monitor developments in schemes that it might be appropriate for the Commons to switch to prior to 2027, and also to transfer to following the end of the five-year extension in 2027. The limitations of the current funding arrangements for the Commons are recognised by the LMC, but the view (shared by the overwhelming majority of stakeholders) is that those limitations are not so severe as to warrant the cessation of participation in them and therefore the Commons having no income. Various Commoners have the rights to graze specified numbers and types of livestock on the Commons. Consultations with the Commoners will take place in relation to any future funding opportunities in the light of those rights. Consultations with all other stakeholders will also take place prior to applying for any future funding opportunities, taking into account the proposed long-term objectives of the Commons identified in Section 1.1 above.

# In summary, it should therefore be noted that the income to the LMC from the current funding arrangements (the BPS and the ELS/HLS) are on a downward trend, with both these sources of income due to cease altogether at the end of 2027. At the present time, the LMC does not have any indication of whether there will be any income from government funding sources after 2027.

It was noted in earlier *Management Plans* that the indications have been that funding will be linked much more strongly to environmental protection and enhancement. Given the abandonment of the trials of parts of the Environmental Land Management Scheme by the Rural Payments Agency, it is unclear whether this will continue to be the case. Any emphasis on environmental protection and enhancement is clearly a positive signal to the Commons; however, it has been pointed out that Common land, along with certain other categories of land, is almost automatically aligned with environmental protection and therefore does not need significant funding to further that objective. It should therefore be recognised that the long-term objectives for the Commons proposed in Section 1.1. above may require some adjustment in order to be able to take advantage of funding schemes, as and when the detail of these schemes become available.

In the light of the uncertainties regarding future funding arrangements, but also the high probability that such funding arrangements will, in any event, only provide significantly reduced income relative to the past few years, the Board intends to take a cautious approach to expenditures. While the net funds of the LMC are currently in a good state, the need to manage the Commons for an indefinite period into the future necessitates the adoption of a long-term approach to balancing income and expenditure. The average expenditure over the past 3 years (2020, 2021 and 2022) has been almost exactly £10,000. The income from the ELS/HLS and the BPS in 2023 will be £10,260, and will continue to decline each year until 2027 (after which it is not known what the funding arrangements will be). Given inflation, the costs of doing the work that the LMC has undertaken in recent years will increase, and therefore there will be an increasing deficit between income and expenditure. While this is sustainable for a limited period of time (due to the reserves that the LMC has accumulated), it is not viable on a long-term basis. The LMC will, therefore, have to consider reducing the scope of its activities in order to keep the finances on a stable, long term, path.

In common with any organisation holding funds, those held by the LMC are subject to erosion from the effects of inflation. The recent figures for inflation in the UK, and the forecasts for inflation rates in 2023 and beyond, are a significant concern for the Board. In common with

the vast majority of charities and not-for-profit organisations, the LMC has sought to reduce the impact of inflation by placing some money as interest-bearing deposits, and has been successful in securing relatively high interest rates for this purpose (although still significantly below the current inflation rate). The LMC has investigated the possibilities of investing in alternative assets as a way of securing above-inflation returns on a long-term basis, but given the continuing volatility in the financial markets in 2022 has decided not to make such alternative investments for the time being, but will keep the position under review.

#### 1.5 Communications

Feedback from a range of users is that the Commons website has continued to provide a valuable source of information relating to the Commons. The Board intends to continue to develop the website where appropriate, along with continuing to regularly update of the information contained on it.

Working parties of volunteers to undertake work on the Commons have been a feature of the Commons for many years, and it is intended that these will continue as a means of building involvement and commitment to the Commons; participants also comment that it is an enjoyable and rewarding thing to do. With the likely reductions in funding income, the role of such working parties will increase in the future.

**Costs:** £300 annual maintenance costs for the website.

#### **1.6** Constitution of the LMC.

There have been no developments over the past year that have impinged upon the appropriateness of the current Constitution for the Land Management Company. The Board will not, therefore, be proposing changes to the Constitution during the time period covered by this Management Plan.

# Section 2. Grass.

#### 2.1 Over-wintering Areas

There are two central requirements arising from the Higher Level Stewardship (HLS) agreement; first, that cutting of the grass does not take place until after the middle of June, and second that 10% of the grassland area under Option HK15 is not cut at that time, with a recommendation that they are cut after 28 February the *following* year. The primary function of the 10% uncut area is the promotion of wildlife for an extended period, but also to protect and promote certain flora. The purpose of the cutting after 28 February is to avoid the encroachment of weeds and invasive species, but by 28 February the absence of cutting will have served its purpose in terms of promotion of wildlife, at least to some extent.

The rationale for the selection of the 10% over-wintering areas at the time of the 2019 Annual Management Plan was that:

- The 10% uncut areas are spread around the various Commons in order to maximise the benefit to birds, wildlife and flora. Some areas have been selected for their proximity to ponds, scrub, etc.
- The 10% areas are generally those that are the least productive areas, and/or are those that are problematic in terms of cutting, turning, baling and carting.

This rationale continues to apply in relation to the intentions for 2023-2024.

The areas that were left uncut in July 2022 will be flailed at some point after 28 February 2023. This work is particularly subject to the prevailing ground conditions, since the wet autumn has left the ground saturated as at December 2022. In 2022, the very wet ground conditions that applied at the end of February meant that flailing could not be undertaken for several weeks thereafter. It is important that these areas **are** cut once per year, however, since without that cutting brambles, sallows, other saplings and injurious weeds would start to dominate. The areas for over-wintering and for flailing in the following spring are identified in <u>Appendix 1</u> [Map 1; all Commons except for Becks Green: Map; 2 Becks Green].

The principle in recent years has been that the over-wintering areas are not changed significantly from one year to the next. The main reasons for following this practice are that doing so results in an overall reduction in the hay yield, along with increased weed pressure following the cut in the spring. In addition, some areas of the Commons are selected for overwintering areas due to them being small, difficult to manage and uneconomic in terms of producing high-quality grass.

**Costs:** The anticipated cost of haymaking in 2023 is £2,100, calculated at a compensation rate of £30 including VAT per acre. The anticipated cost of cutting and collecting the grass on the over-wintered areas in 2023 is £600, based on the cost in previous years. The late grass cut of Holdens East and Mill Common is anticipated to cost £500 including VAT in 2023, again based on the cost in previous years.

#### 2.2 Control of Weeds.

One of the requirements of the HLS agreement is that a number of injurious species of weeds should be controlled. Spot spraying of thistles on the HK15 areas was undertaken in 2020, and this was followed up with further spot spraying on Great Common in June 2021. In overall terms, the incidence of thistles was low in 2022, and it is therefore intended that only very limited spot spraying will be needed in 2023. This would be limited to only one part of any Common in order to not limit access to a Common unduly.

Ragwort was less of a problem in 2022 than was feared, and no particular measures were taken to counter this. The situation will be monitored, and if ragwort *does* become a problem, it is intended to form working parties to pull the ragwort as needed.

It has to be noted that any initiative to control weeds will be dependent on weather conditions and on the availability of personnel at the appropriate time to undertake the work, and therefore cannot be guaranteed.

**Costs:** The cost of the spot spraying of the thistles is difficult to estimate, but it is hoped to limit this to £200 in 2023.

# Section 3. Hedge and Scrub Cutting

The advice received from Kim Pearce (DEFRA) and Tim Schofield (Suffolk FWAG) in November 2018 was that hedges should be cut either once every three years or once every two years. The Board adopted the approach of cutting hedges on a rotating basis every two years, although it should be noted that in a slow-growing year (for example, due to a drought or a cold spring), some hedges/parts of hedges may only require cutting once every three years. The reason for preferring cutting every two years is that if hedges are normally cut every three years, they would then need to be cut back hard. In turn, this leads to defoliation and the hedge becomes too cold and open for birds to nest there. The Board continues to see the approach as the best way of maintaining the characteristics of the hedges to promote wildlife, and therefore intends to continue to adopt it.

<u>Appendix 3</u> [Hedge Cutting and Scrub Flailing Plan 2023] identifies the hedges to be faced or topped. It also identifies the areas of scrub to be flailed.

Any hedge would not normally be topped *and* faced in the same year, although there may be specific instances where this is appropriate. Flailing is used for those boundaries that constitute scrub and where flailing is therefore more appropriate to avoid the encroachment of the scrub onto the Commons. The plans for hedge and scrub cutting will be subject to amendment in the light of weather conditions, but it is anticipated that the work will be undertaken before the Commons become too wet, and therefore unsuitable for heavier machinery. In rare circumstances it may be necessary to maintain hedges or scrub which are not detailed in the Management Plan. This could result as a matter of nuisance or safety which are not detailed in this Management Plan and the Appendices at the time of publication,

**Costs:** The estimated cost of the hedge and scrub cutting activity for 2023 is £1,500 (including VAT).

# Section 4. Drainage and Anti-Incursion Ditch Maintenance, Road and Trackside Flailing.

Appendix 4 [Ditch Flailing and Ditch Work 2023/24] outline the planned flailing work on the selected track and roadside ditches during the 2023-24 period.

This work is carefully managed to ensure wildlife corridors are created wherever possible, and to this end maintenance is planned on a rotational basis. It is possible that works will be undertaken at various locations around the Commons on drainage ditches, anti-incursion ditches and security bunds. As part of the ongoing rolling programme, routine inspections will be made and any remedial work will be undertaken as and when considered necessary. Accordingly, it is not possible to publish, in advance, a plan of this work. Extreme wet weather will continue to identify locations which require maintenance, but are not the responsibility of the LMC. The Board decided that it would be appropriate, for the benefit of the community as a whole, to undertake such maintenance, since if undertaken at the appropriate times in conjunction with other work, it would constitute a cost-effective solution. The Board intends to undertake such work as and when necessary.

As in previous years, in the autumn a survey will be conducted to identify the growth of any sallows or saplings within the ditches. If required these will be cut out during the winter months and treated to prevent regrowth.

#### In order to ensure compliance with the terms of the HLS/ELS agreement, it should be emphasized that no work should be undertaken on any drainage and anti-incursion ditches without the explicit agreement of the LMC.

**Costs:** The intention is to limit the cost of this work to £2,000, although it should be recognized that this will be dependent on the need for such works.

#### Section 5. Other Works

#### 5.1 Ponds.

Having undertaken a great deal of pond restoration in recent years, it has been recommended that fronts are kept cut and open during the growing season (see point about pond survey below). The aesthetic value will be greatly improved, the investment rewarded, and it will also alleviate the need for major works in the future. This work will be undertaken on a regular basis, probably around three times during the growing season.

The ponds in question are:

- Hawthorn
- Great Common, opposite 'The Homestead'
- Great Common, in front of 'English Cottage'
- Great Common, in front of Dairy Farm
- Great Common, west end
- Mill Common
- Blacksmiths
- The Mardle
- Little Common

**Costs:** The estimated cost of this activity is £180 (no VAT) per visit.

In accordance with the advice contained within the pond survey, patch scraping selected ponds will be undertaken to control the spread of invasive Reedmace (bulrush). A trial of this work was undertaken in November 2022 on two ponds on Great Common, and initial results indicate that this was very successful with minimal impact on wildlife. Subject to advice from the pond survey to be undertaken in 2023 (see below) this work will be continued. It is proposed that affected ponds will be identified each year and work initiated on a rotational basis.

Costs: The estimated cost of this activity in 2023/24 is £700 (including VAT).

The pond survey undertaken during 2020 [available on the Commons website at: <u>http://www.ilketshallcommons.co.uk/assets/docs/PDF-Docs/Pond%20Survey%202020.pdf</u>] illustrates the importance of continued maintenance and provides recommendations of the works required in order to maximise the quantity and diversity of the wildlife that the ponds support. Given the expertise on which these recommendations were based, it is intended that these will be followed. Furthermore, it has been agreed that pond surveys will be conducted every three years in order to provide an ongoing reference as to the state and quality of the ponds. The next survey will therefore be undertaken during the summer of 2023.

**Costs:** The estimated cost of the 2023 pond survey is £500 (including VAT).

Following comments from individuals regarding the management of the nine ponds that are maintained by the LMC, the Board will consult further with its specialist advisers regarding the advantages and disadvantages of pursuing a more differentiated approach to the management of these ponds. Account will need to be taken of the fact that there are a number of ponds on the Commons additional to these nine that are not managed in accordance with the specialist guidance, along with many other common and private ponds in the near proximity to the various Commons.

#### 5.2 Trees

There are a large number of trees around the edges of the Commons, and to a lesser extent on the Commons themselves. Following concern being expressed to the Board by a resident regarding the safety of such trees, a survey was undertaken by a tree surgeon in November 2022. The feedback from that survey concluded that there were no trees that constituted a safety risk such that they required immediate attention. A number of trees, and limbs of trees, were identified which could usefully receive attention to further reduce risk, and these will be attended to during 2023.

The intention is to arrange for a tree survey to be conducted by a tree surgeon every four years in future. In intervening years, members of the Board will conduct a survey, and bring in specialist expertise if and when thought necessary.

#### 5.3 Other planned works:

The permissive grass pathways will be cut during the growing season as and when required. On the basis of experience in previous years, this could be on 3 - 5 occasions.

Costs: The estimated cost of this work for 2023 is £120 (inc VAT) per visit.

Vehicular access points and/or pedestrian access points, together with areas around benches, will be strimmed as and when required. On the basis of experience of previous years this is likely to be on 3 occasions.

Costs: The cost estimate of this strimming work for 2023 is £180 (no VAT) per visit.

The 'wetland' area on Little Common East has a schedule for 20% of its area to be cut each year, weather permitting. It is intended to continue with this schedule in 2023-24..

Costs: The estimated cost of this work on the 'wetland' area in 2023 is £50 (no VAT).

The area of grass immediately around The Mardle will be cut during the growing season as and when required. On the basis of experience of previous years this could be on 3-5 occasions,

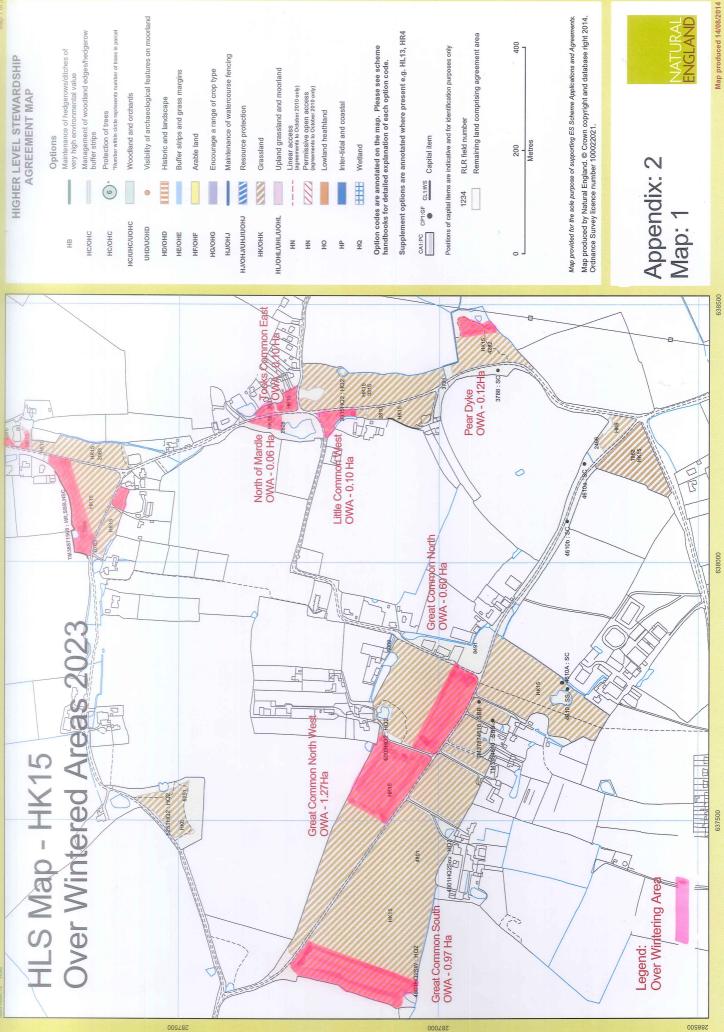
Costs: The estimated cost of this work for 2023 is £50 (no VAT) per visit.

## 6. Other expenditures, and total anticipated expenditures in 2023-24.

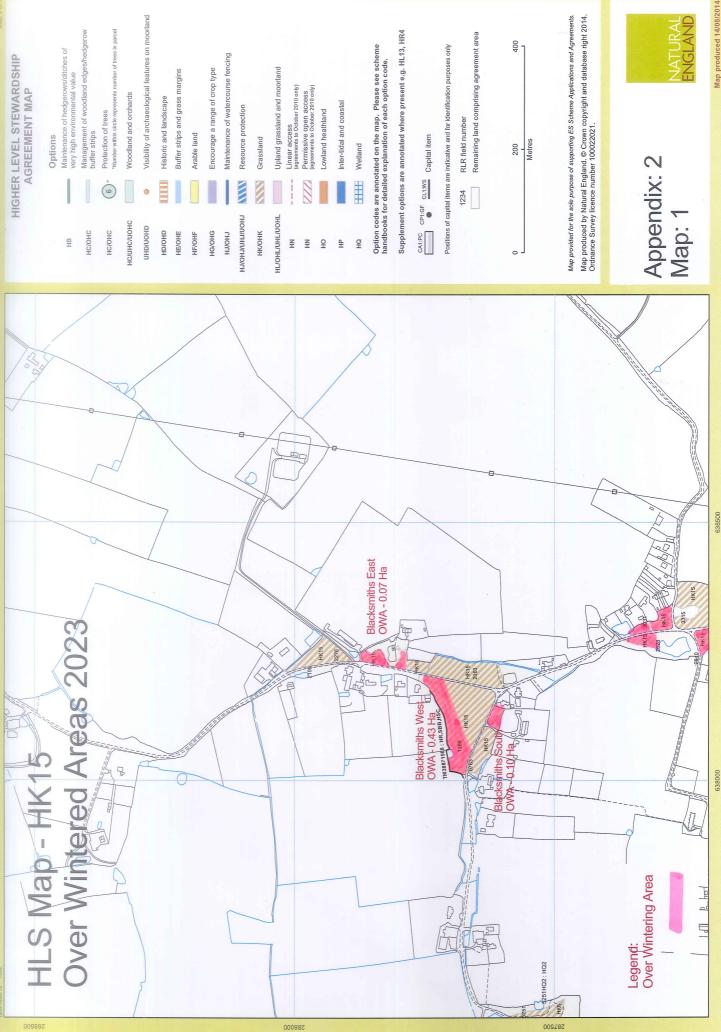
Certain other recurrent expenditures not referred to above need to be allowed for. These include fees to accountants; fees to Companies House; the cost of insurance; and the hire of the Village Hall for the AGM, etc..

**Costs:** The anticipated cost of these recurrent items of expenditure in 2023-24 is £1,500.

**Total estimated expenditure:** Taking all the estimated costs above, and recognising the uncertainty around many of the estimates, the total expenditures by the LMC for the period from March 2023 until February 2024 is estimated to be in the range of £10,000 to £12,000.

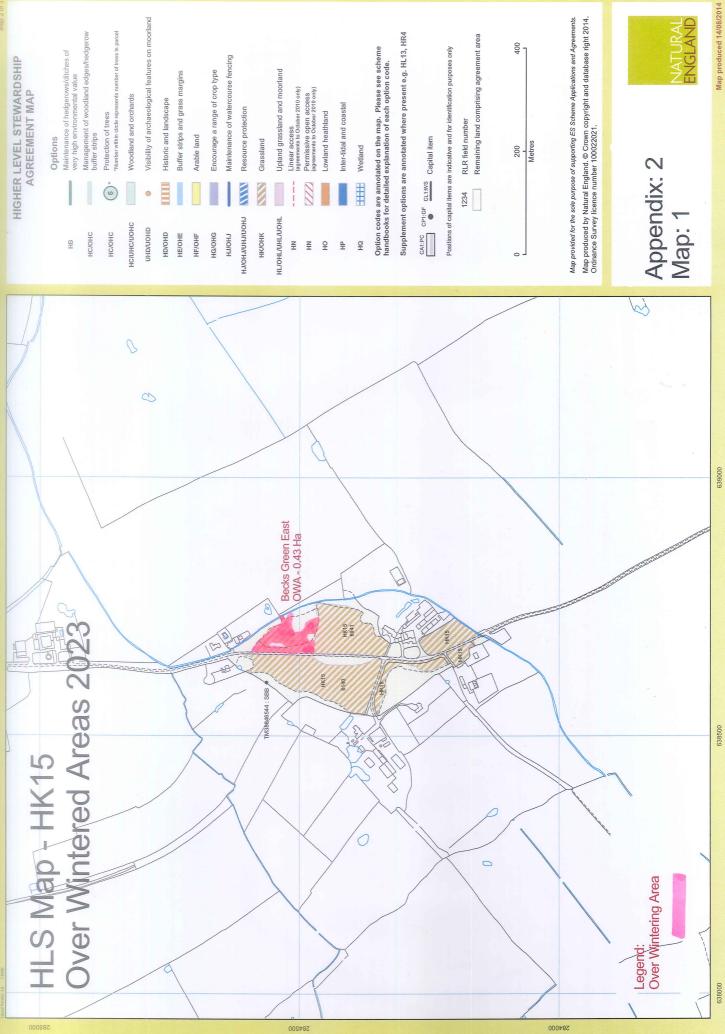


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