

Scotland Rural Development Programme 2014-2020



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

British Ecological Society – Scottish Policy Group

Title Mr ☐ Ms ☐ Mrs ☐ Miss ☐ Dr ☒ **Please tick as appropriate**

Surname

Norton

Forename

Lisa

2. Postal Address

Centre for Ecology and Hydrology

Library Avenue

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Postcode LA1 4AP

Phone 01524 595825

Email lrn@ceh.ac.uk

3. Please indicate which category best describes you or your organisation (Tick one only)

INDIVIDUAL WITH PRIMARY INTEREST IN:	
Farming	<input type="checkbox"/>
Forestry	<input type="checkbox"/>
Fishing	<input type="checkbox"/>
Deer or game management	<input type="checkbox"/>
General land management (or interest in a combination of land uses)	<input type="checkbox"/>
Other rural community issues	<input type="checkbox"/>
Other - Please State:	<input type="checkbox"/>
ORGANISATION WITH PRIMARY INTEREST IN:	
Public Bodies (National)	<input type="checkbox"/>
Local Authorities and other local public bodies	<input type="checkbox"/>
Environmental and Nature conservation organisations, charities and representative bodies	<input type="checkbox"/>
Deer or game management organisations, charities and representative bodies	<input type="checkbox"/>

Farming organisations, charities and representative bodies	<input type="checkbox"/>
Forestry organisations, charities and representative bodies	<input type="checkbox"/>
Fishing organisations, charities and representative bodies	<input type="checkbox"/>
General land management organisation, charities or representative bodies	<input type="checkbox"/>
Local community organisation, charities or representative bodies	<input type="checkbox"/>
Other - Please State: Ecological Society - provision of ecological research relevant to environmental management	<input checked="" type="checkbox"/>

4. Permissions - I am responding as...

Individual / Group/Organisation

☐

Please tick as appropriate

☒

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

☐ Yes ☐ No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick **ONE** of the following boxes

Yes, make my response, name and address all available ☐

or

Yes, make my response available, but not my name and address ☐

or

Yes, make my response and name available, but not my address ☐

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate

☒ Yes ☐ No

- (d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

☒ **Yes**

SCOTLAND RURAL DEVELOPMENT PROGRAMME (SRDP) 2014-2020: CONSULTATION QUESTIONS:

We are inviting written responses to this consultation paper and respondents can reply to all of the questions, or a selection, depending on where their interests lie. Everything you tell us will help us design a better SRDP. The consultation takes place over an eight week period and closes on **Sunday 30 June 2013**.

Please send your response with the completed Respondent Information Form to either:

SRDP2014-2020Consultation@scotland.gsi.gov.uk

or

SRDP 2014-2020 Consultation
D Spur
Saughton House
Edinburgh
EH11 3XD

SECTION 2 : SETTING THE CONTEXT

Question 1: Given the EU's Common Strategic Framework approach do you agree or disagree that EU funds in Scotland should be marshalled into three funds (paragraph 27)?

Agree ☒ Disagree ☐

Please explain your views.

These appear to be sensible groupings, but they need to be linked across groups to ensure that the environmental impacts of economic decisions are considered, e.g. the impacts of reforestation of marginal lands on biodiversity conservation measures and food production (under predicted changed climates) may be -considerable.

The Scottish Land Use Strategy is aimed at making these sectors talk to one another, so it is to be hoped that they will do so.

Question 2: Do you agree or disagree with the proposed establishment of a single Programme Monitoring Committee to ensure all EU funds are targeted effectively (paragraph 29)?

Agree ☒ Disagree ☐

Please explain your views.

This group could ensure discussion across the separate priorities outlined above. COSLA involvement may improvement engagement with specialist staff within Local Authorities.

SECTION 3: OUR INVESTMENT PRIORITIES FOR RURAL DEVELOPMENT

Question 3: Given the need to prioritise our spending in the future programme (paragraph 11) which articles do you see as a priority for use within the next programme?

Agree ☐ Disagree ☐

Please explain your views.

We have identified the following articles as having an ecological benefit associated with them, and so would consider these to be of particular interest:

Article 16

Article 17

Article 19 - Suggestions for preventative actions should take into account possible negative environmental impacts.

Article 22

Article 23 - with connectivity and habitat suitability being considered where woodlands are being created.

Article 24

Article 25 - Biodiversity conservation aims need to be properly integrated into green infrastructure initiatives, with good science to help make the most of potential opportunities.

Article 29

Article 30

Article 31

Article 32

Article 33

Article 35

Article 36

There are no articles specific to the maintenance/improvement of upland farmed landscapes (particularly those based on peatland) although there is a very large emphasis on forestry. The articles do not represent a balance of the important Scottish habitats.

SECTION 5: STRATEGIC TARGETING OF INVESTMENTS

Question 4: Do you agree or disagree that we should geographically target our investment to areas where support will make the greatest contribution to our priorities?

Agree ☒ Disagree ☐

Please explain your views.

Targeting would be a sensible way of prioritising support under constrained circumstances but it does risk further deterioration (ecologically) of areas not receiving support.

SECTION 7: DELIVERING THE SRDP: PROGRAMME STRUCTURE

Question 5: Do you agree or disagree that support for small local businesses should be provided through LEADER?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 6: Do you agree or disagree to the proposal to disband RPACs and replace with a more streamlined assessment process as explained in Section 8?

Agree ☐ Disagree ☐

Please explain your views.

Whether RPACs are disbanded or not, there still needs to be an assessment of proposals in a regional context. There could be a number of ways of doing this, but recently SNH commissioned a report on developing priorities for the Local Biodiversity Area Partnerships that identified priorities for species and habitats by LBAP.

PAKEMAN, R.J.; BEALE, C.; BROOKER, R.; CHAMBERLAIN, D.; DEMARS, B.O.L.; IASON, G.R.; MCLEOD, J.; LITTLEWOOD, N.; LISEWSKI, V.; TAYLOR, A.F.S. (2011) Prioritising species and habitat actions by Local Biodiversity Action Partnerships in Scotland. Report to Scottish Natural Heritage.

Question 7: Do you agree or disagree that LMOs should be removed from the future programme, given the spending restrictions we are likely to face and the need to ensure maximum value from our spending?

Agree ☐ Disagree ☐

Please explain your views.

If Land Managers Options are removed from the programme, could their essence be incorporated into a revised GAEC to ensure basic minimum standards on environmental action?

Question 8: Do you agree or disagree that the Forestry Challenge Funds be discontinued, with WIAT being funded through Rural Priorities and F4P funding being provided via LEADER?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 9: Do you agree or disagree that Food and Drink grants be decided via the wider decision-making process for business development applications or should they remain separate and managed within the Scottish Government as is the current practice?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 10: Do you agree or disagree with crofting stakeholders that a Crofting Support Scheme is established in the new programme that will fund all grants relevant to crofting?

Agree ☒ Disagree ☐

Please explain your views

A separate scheme for crofters would target money to small, extensive units where high gains could be made for biodiversity and rural development.

Question 11: If a Crofting Support Scheme is developed, do you agree or disagree that crofters (and potentially small landholders) be restricted from applying for other SRDP schemes which offer similar support?

Agree ☒ Disagree ☐

Please explain your views.

It would have to be restricted to keep it simple for applicants and reviewers. However, it would mean that any crofting orientated scheme would also have to be comprehensive in its contents so there was no need to try and go outside it.

Question 12: Do you agree or disagree on whether support for crofting should extend to small land holders of like economic status who are situated within crofting counties?

Agree ☒ Disagree ☐

Please explain your views.

Firstly it would treat applicants in similar situations regarding land management in the same way, even though their legal position was different. Secondly, it would simplify the application procedures.

Question 13: Do you agree or disagree with the proposed replacement of the Skills Development Scheme with an Innovation Challenge Fund?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 14: Do you agree or disagree with the measures proposed by the New Entrant Panel (paragraph 92) to encourage new entrants to farming?

Agree ☐ Disagree ☐

Please explain your views.

Comments

SECTION 8: APPLICATION AND ASSESSMENT PROCESS FOR AGRICULTURE, ENVIRONMENT, LANDSCAPE AND FORESTRY

Question 15: Do you agree or disagree with the proposed case officer approach to the assessment of applications?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 16: Do you agree or disagree with the proposed single entry route for applications with a two level assessment process?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 17: Do you agree or disagree with the proposed negotiation of variable intervention rates rather than setting fixed intervention rates?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 18: Do you agree or disagree with the proposed setting of regional budgets across the Rural Development Regulation (RDR) articles?

Agree ☐ Disagree ☐

Please explain your views.

Comments

Question 19: What support and assistance do you think applicants will need for this application process to work effectively?

Please explain your views.

Comments

SECTION 9: INTEGRATED INVESTMENTS

Question 20: Do you agree or disagree with the value of developing a descriptive map of holdings to help farmers and stakeholders understand the potential ecosystem value of specific holdings?

Agree ☒ Disagree ☐

Please explain your views.

This would be a very useful source of data to ecologists to understand environmental change, particularly if it effectively covers the full spectrum of natural capital (contributing to ecosystem service provision) on farmland. Being realistic, however, ecological understandings of ES/natural capital are still in their relative infancy so there are likely to be gaps. The development of this type of mapping is worth exploring, but the technology has to be there before it is rolled out. For instance, how long would this type of map take to prepare and who would do it?

Consideration should also be given to trying to make sure that any new formats developed for describing ecosystem value are compatible with existing data sources (e.g. the UK Countryside Survey) and also compatible with data collected in England and Wales under their RDP schemes.

Question 21: Do you agree or disagree with the proposal to allow applicants to submit single applications which set out all investments/projects that the applicant would like to take forward on their land?

Agree ☒ Disagree ☐

Please explain your views.

Yes – definitely required if there is going to be any assessment of interactive impacts on ecosystem service delivery. This is the best way of seeing how proposals mesh together and affect a holding.

SECTION 10

Question 22: Do you agree or disagree that it would be helpful to allow third party applications for specific landscape scale projects?

Agree ☒ Disagree ☐

Please explain your views.

Question 23: Do you agree or disagree with public agencies working together to identify priority areas that could benefit from a co-ordinated third party application?

Agree ☒ Disagree ☐

Please explain your views.

Comments

Question 24: Do you agree or disagree with the establishment of a separate fund to support collective action at the landscape scale?

Agree ☒ Disagree ☐

Please explain your views.

We would like to see landscape level approaches and empowerment of local networks to take landscape actions. A separate fund may help to reduce the likely administrative issues associated with such an approach. The revised Scottish Biodiversity Strategy is focused on activities at the landscape/catchment scale – it is aimed at prioritising catchments that are in a particularly bad state and then focusing effort on these. So from a conservation perspective, agencies will be working together to identify priority areas anyway. They have also struggled previously in terms of getting conservation action underway, i.e. they have had to persuade land owners to apply for money (rather than previously being able to pay for action). So a separate fund where they have more influence could be very effective.

It takes time for bottom-up approaches to develop, and there is therefore a role for third parties to organise land owners into larger projects that they may not necessarily see as possible at the level of their holding. There is a degree of targeting necessary to develop these proposals and to get widespread agreement. It would be an appropriate use of funds to target funding to larger-scale projects. This is particularly true given the desire to adopt an ecosystem approach – and operating at larger-scales is more likely to achieve this.

SECTION 11: ADVISORY SERVICE

Question 25: Do you agree or disagree with broadening the Whole Farm Review Scheme to include biodiversity, environment, forestry, water pollution control and waste management?

Agree ☒ Disagree ☐

Please explain your views.

Everything needs to be included in the whole farm review scheme. Doing it any other way risks emphasising certain aspects of an operation and ignoring others. This kind of approach is needed in order to support the Land Use Strategy and the refreshed Scottish Biodiversity Strategy, so it fits with existing policy.

Question 26: Do you agree or disagree that we allocate SRDP budget to advice provision when we move to the next programme?

Agree ☒ Disagree ☐

Please explain your views.

The cost seems to imply that it would be sensible to look for alternatives. However, ultimately the likely cost:benefit ratio should be used to assess whether the cost is worth paying. It is likely that to gain maximum benefit from the programme there has to be advice available to develop the best proposals to deliver the goals of the programme. However, by having funds available it begs the question 'who could provide that advice?' SRUC advisors are primarily agricultural advisors, but advice is needed to cover forestry, biodiversity etc. Without FWAG, it is difficult to see any group being able to do this, especially in the relatively tight timetable.

SECTION 12: FINANCIAL INSTRUMENTS

Question 27: What are your views on the merits of providing loans for specific purposes and/or specific sectors?

Please explain your views.

Comments

SECTION 13: VOLUNTARY MODULATION

Question 28: Do you agree or disagree with the proposal to maintain the current level of transfer from Direct Payments to SRDP in the new programme period?

Agree ☐ Disagree ☐

Please explain your views.

Comments

SECTION 14: EQUALITIES IMPACT ASSESSMENT (EQIA)

Question 29: Please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any of the equalities characteristics listed in paragraph 136.

Comments

