

CWA Response to SRDP Stage 2 Consultation

The Community Woodlands Association (CWA) welcomes the opportunity to comment on the Consultation on the Scotland Rural Development Programme (SRDP) 2014 – 2020.

The CWA represents 200 community woodland groups across Scotland, the majority of who own or lease woodland and other land. They seek to deliver a wide range of public benefits, for many of which the Scotland Rural Development Programme is, or should be, a key funder.

Our collective experience of the first SRDP was disappointing, to say the least. Whilst there were some issues with the content of the programme, by far the major difficulties were around process: application, management and in particular the complexity, bureaucracy and lack of clarity over audit requirements.

We welcome the recognition of failings in the administration of the first programme: it essential that the new programme learns from the mistakes of the past, and in particular that the architecture of the SRDP offers support all potential applicants, not just farm businesses.

Summary of main points of our response.

- **Overall, budget allocations excessively favour farm businesses and do not reflect the diversity of the rural economy. Only a minority share of the “rural development” budget is actually available for rural development.**
- **LFASS is not designed to deliver rural development objectives and should not be included within the SRDP**
- **The budget allocation for LEADER is too small and will severely limit potential investment in rural community development.**
- **The Forestry budget allocation is insufficient to deliver the stated objectives, in particular the woodland expansion targets.**
- **Support for public access creation in new and existing woodlands should be available across Scotland (subject to demonstrable demand) and not restricted to the WIAT area.**
- **Improvements to application process and the proposed advisory services appear to be focussed largely on farm businesses with no recognition that community groups will seek to access support from the programme.**
- **We welcome the proposed support for Cooperation and Small Rural (non-agricultural) Businesses.**

Finally, we note that the proposed SRDP does not appear to be aligned with (or even conscious of) other elements of Scottish Government policy, such as the Community Empowerment Bill, and the ongoing review of Land Reform legislation, and a notable absence of measures which would support an increase in the diversity of ownership and management in Scotland.

Question 1

How would you rate your satisfaction with the budget as a whole?
(Very satisfied – very dissatisfied)

Very dissatisfied

If you are dissatisfied please outline your reasons

The proposed SRDP budget allocations excessively favour farm businesses, often with no objective other than the preservation of unviable business and the continuance of unsustainable farming practices, and do not reflect the diversity of the rural economy. Unfortunately only a minority share of the Scotland’s “rural development” budget will be available for rural development.

The LEADER allocation is a particular concern. This has been set at only 5% of the overall budget - the minimum allowable under the Regulations – which does not reflect well on the Scottish Government’s commitment to supporting broad-based community development.

The LEADER allocation should be substantially higher, particularly given the additional operations and activities that have been brought within LEADER’s scope, and the increased proportion of the budget that will be allocated to administrative costs around animation and applications.

Question 2

Are you broadly satisfied with the new application and assessment process for land based investments outlined in section 5?
(Very satisfied – very dissatisfied)

Neither satisfied nor dissatisfied

If you are dissatisfied please briefly outline your reasons

We welcome the recognition that the application and assessment processes of the previous SRDP were overly complex and bureaucratic, and the commitment to improved processes in SRDP2, however, it is not yet clear whether this will deliver an improved service for applicants.

This commitment to improved process should be backed by guaranteed timescales for administration processes and grants payments.

We also hope that the commitment to improved processes and customer service applies to all elements of the SRDP, and not just the land based investments

Question 3

Should support for farmers operating in constrained areas be continued through the SRDP? Y/N/Other, please specify

No

LFASS is a fundamentally flawed scheme that is not well targeted geographically and is not focused on delivering the economic, environmental and socio-economic outcomes of the Rural Development programme.

If direct payments to farmers operating in naturally-constrained areas are necessary then they should be accommodated within the existing and very substantial Pillar 1 budget.

Unearned and unfocussed direct subsidies do not constitute rural development funding and indeed serve to hinder rural innovation and development, not foster it.

Question 4

How would you rate your satisfaction with the proposals for the New Entrants Scheme?

(Very satisfied – very dissatisfied)

Very dissatisfied

If you are dissatisfied please briefly outline your reasons

Support for new entrants should be available to a wider range of applicants, including new woodland crofters.

Support for new entrants should not be available for intergenerational transfers.

Question 5

Should a scheme be expanded to provide capital support to small farms? Y/N

Yes, but this should include capital support for woodland smallholdings.

Question 6

Is a 3 to 50 hectare range appropriate for defining a small land holding? Y/N

Yes

Question 7

Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees? Y/N

If no, please explain why

Question 8

How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?

(Very satisfied – very dissatisfied)

If you are dissatisfied, please briefly outline your reasons

Question 9

How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?

(Very satisfied – very dissatisfied)

Neither satisfied or dissatisfied

(Additional comments)

We recognise that this is an important area for support, but would argue that any future Agri-Environment scheme needs to be much better targeted and accounted for. We note that the substantial funding was channelled through agri-environment measures in SRDP 1 yet there have been ongoing significant losses of farmland birds.

In particular, there needs to be clarity about the additionality of the operations being supported, some of which might reasonably be considered as part of good farm stewardship and therefore already paid for under Pillar 1

Question 10

It is proposed to support forestry under six main areas as outlined below. Please identify whether you agree with these broad areas.

(yes should be included, no should not be included, no opinion)

- | | |
|--------------------------------------|--|
| 1. Woodland Creation | Yes |
| 2. Agroforestry | Yes, but through Agri-Environment |
| 3. Tree Health | No |
| 4. Woodland Improvement Grant | Yes |
| 5. Process and marketing | Yes |
| 6. Sustainable Management of Forests | Yes |

Question 11

We propose nine woodland creation options with support through standard costs. Should these be included? (yes should be included, no should not be included, no opinion)

- | | |
|-------------------------------|------------|
| 1. Conifer | Yes |
| 2. Diverse conifer | Yes |
| 3. Broadleaves | Yes |
| 4. Native Scots Pine | Yes |
| 5. Native Broadleaved W4 | Yes |
| 6. Native Broadleaved Other | Yes |
| 7. Native low density | Yes |
| 8. Small or Farm Wood | Yes |
| 9. Northern and Western Isles | Yes |

(Additional comments)

We note that grant rates are not being consulted on, and we understand that Standard costs are currently being updated. It will be important to ensure that intervention rates offered do not excessively favour one woodland type over all the others, as has been the case in the past.

Question 12

Are there any other woodland types that should be supported? If yes please specify

Question 13

Should the Central Scotland Green Network be allowed an 'Additional Cost Contribution'? Yes/No

Yes but..

If No, please briefly explain your reasons

We agree that creating new woods on small, peri-urban sites can entail higher costs; however we do not believe that these circumstances are unique to the CSGN area – any such additional cost contribution should be available across Scotland wherever they can be demonstrated.

Question 14

What is your preferred option for Income Foregone in SRDP 2014 - 2020?

Option 1 - Minimal change to design structure available in 2007-2013 SRDP.

Option 2: IF payments removed.

Option 3: IF payments to remain with calculation to exclude DP payments.

Option 2 (probably)

Please explain your choice

We favour option 2 as it appears to be simpler and easier to administer. Additionally, the removal of IF payments in favour of enhanced woodland

creation and maintenance payments would redress the current inequality between agricultural and non-agricultural landholdings (or rather between those in receipt of DP and those not eligible).

Question 15

Do you agree with the range of 'other support' for woodland creation? (yes should be included, no should not be included, no opinion)

- | | |
|-----------------------------------|-----------------------|
| a)Tree shelters and fencing | Yes |
| b)Improved stock for Sitka Spruce | Yes |
| c)Bracken contribution | Yes |
| d)Community woodland | See note below |

We support the provision of additional support to encourage public access in new woodlands adjacent to settlements where there is justified demand, but we do not agree that this should be restricted to settlements with a population of over 2,000 people.

We also object strongly to the misrepresentation (not for the first time) of this funding for access provision for new peri-urban woods as "support for Community Woodlands" when there is no requirement for meaningful community involvement and engagement – this element should be renamed “public access provision”

Question 16

Should agroforestry be funded through the SRDP 2014 - 2020? Yes/No/No opinion

Yes, but it would be better placed in the agri-environment section of the programme.

Question 17

Should Tree Health be funded through the SRDP 2014 - 2020? Yes/No/No opinion

No

We welcome the Scottish Government’s commitment to creating a support mechanism for tree health issues, but are not convinced that it is appropriate to do this by creating an additional burden on limited SRDP Forestry funds.

Question 18

Do you agree with the range of Woodland Improvement Grants? Yes/No/No opinion.

- | | |
|--|-----------------------|
| 1. Long term forest planning – new | Yes |
| 2. Long term forest planning – renewal | Yes |
| 3. Reducing Deer Impact | Yes |
| 4. Woodland Habitats and Species | Yes |
| 5. Restructuring Regeneration | See note below |
| 6. Non- Woodland Habitats and Species | Yes |
| 7. Natural regeneration | Yes |
| 8. Woodlands In and Around Towns | See note below |

Note 5: We welcome the apparent simplification of restocking payments. As with new woodland creation it is important to ensure that grant rates do not excessively promote one woodland type. Overall, support rates for restocking should be higher than the current SRDP and should include support for fencing where necessary and appropriate.

Note 8: Support for operations to improve public access to woodlands should be available through Woodland Improvement Grants, but eligibility should be not be restricted to the WIAT area

The limitation of support to the WIAT area undermines FCS's SFS commitment to social forestry in general, and the policy commitment to the National Forest Land Scheme in particular. The majority of the woodlands that community groups acquire, whether from public or private sector, have little or no existing provision for public access, and the development of access is a prerequisite for increased community engagement and delivery of other benefits.

Question 19

We propose to offer support to forest owners, micro-enterprises and SMEs for investments which enhance forestry potential or relate to processing and marketing, or adding value to forest products. Should these areas be supported through the SRDP?

1. Small scale premium processing sector
2. Equipment to increase harvesting in under-managed woods
3. Equipment to increase capacity for steep ground harvesting

Yes, we welcome this support

Question 20

Do you agree with the range of Sustainable Management of Forest grants? (yes should be included, no should not be included, no opinion)

- | | |
|--|------------|
| 1. Native Woodlands | Yes |
| 2. Low Impact Silvicultural Systems (LISS) | Yes |
| 3. Public Access | Yes |
| 4. Public Access WIAT | Yes |

- | | | |
|----|-------------------|-------------------|
| 5. | Livestock Removal | No opinion |
| 6. | Woodland Grazing | No opinion |

Question 21

How would you rate your broad satisfaction with the proposal for the Forestry Scheme?

Quite dissatisfied

If you are dissatisfied please briefly outline your reasons

CWA supports the majority of the proposals, however there are a few key issues:

The Forestry allocation is insufficient to deliver all the proposed outputs - the £36M per annum budget is unlikely to be enough to deliver the Scottish Government's 9,500 ha private sector planting target – and should be substantially increased.

Given the tight budget, we understand the perception that cutting or restricting support for social forestry measures is an “easy” saving, however we argue that such cuts not only undermines FCS Scottish Forestry Strategy commitments, but also constrains the delivery of a wide range of public benefits from woodlands – and that these are precisely the public benefits on which the industry relies for its current levels of public support.

Question 22

How would you rate your broad satisfaction with the proposals for co-operation?
(Very satisfied – very dissatisfied)

Quite satisfied

If you are dissatisfied, please briefly outline your reasons

We welcome the proposals for support for Cooperative action.

Question 23

How would you rate your broad satisfaction with the proposals for Small Rural Business Support?

Quite satisfied

If you are dissatisfied, please briefly outline your reasons

We welcome the proposals for Small Rural Business Support, which have the potential to make a substantial positive impact on rural development.

There is a need to ensure that where this support is provided for farm diversification projects it is clear that the activities supported are new, additional and not simply being used to cross-subsidise existing businesses.

It is critical that investments made through this part of the SRDP are covered by appropriate state aid schemes and exemptions.

Question 24

Should the Scottish Government continue to give significant support to the food and drink sector? Y/N

The drink sector is undoubtedly a commercial success (albeit with considerable wider social costs) and has become an important element of the “Scottish brand”. However, it’s not entirely clear what market failure is being addressed or public benefit purchased by continued investment of rural development funds in the sector, especially when other budgets are being squeezed, and question whether the drinks sector actually needs public support in this manner.

Question 25

Should selection criteria such as those listed below apply to the Food and Drink Scheme? Y/N

- a)Contribution to the Scottish Government’s overall strategies for economic development and the rural economy
- b)Making a contribution to national policies for food and drink
- c)Assisting the Scottish Government with its wider social policies
- d)Supporting export targets for food and drink sectors

Question 26

Should steps be taken to streamline processes for food companies including a one stop shop for public support? Y/N

Question 27

How would you rate your broad satisfaction with the proposals for Food and Drink support?

(Very satisfied – very dissatisfied)

If you are dissatisfied, please briefly outline your reasons

Question 28

How would you rate your broad satisfaction with the proposals for LEADER?
(Very satisfied – very dissatisfied)

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons

The budget allocation for LEADER has been set at the absolute minimum allowed by EU Regulations, and is clearly insufficient to deliver the desired outcomes of the programme, especially given the additional operations and activities which have been bought within the scope of LEADER, which appears to be being viewed as the only source for community based funding.

We question whether this budget allocation is based on an assessment of the potential opportunities and benefits from an improved LEADER programme and the level of investment that would require, or was simply used as the minimum that Scottish Government could get away with spending on community development within a programme that is heavily weighted towards land management interests

The operation of Leader in SRDP1 was been bedevilled by process issues, in particular the disproportionate application, reporting & monitoring procedures imposed at the behest of SG Audit which greatly increased the transaction costs for applicants and administrators, with little if any demonstrable public benefit.

We welcome the increase in the proportion for the budget available for administration and animation, however this will place further stress on the budget and limit the proportion available to communities.

Question 29

Do you agree with the range of options listed below which are being included within the KTIF scheme? Y/N

- | | |
|-----------------------------|---|
| a)Skills development | Yes |
| b)Vocational training | Yes |
| c)Monitor farms | Yes but with a limited share of the budget |
| d)Setting up an EIP network | Yes |

Question 30

How would you rate your broad satisfaction with the proposals for KTIF?
(Very satisfied – very dissatisfied)

Quite satisfied

If you are dissatisfied, please briefly outline your reasons.

We support the intention to build on the existing SDS and continue to provide funding for vocational training and skills development. It is important that these opportunities continue to be available (as they are under SDS) to a wide range of land managers, including community groups.

Question 31

How would you rate your broad satisfaction with the proposals for the Advisory Service?
(Very satisfied – very dissatisfied)

Neither satisfied nor dissatisfied

If you are dissatisfied, please briefly outline your reasons

That there is a perceived need for a £20M advisory service to make SRDP2 work does not bode well...

Whilst we welcome the recognition that funding for advisory services is necessary we are not convinced by either the architecture, which seems very agency-focussed and centralised, or the apparent targeting at farming.

As much as possible of the work of any future Advisory Service should be outsourced to existing specialist advice and support organisations (including CWA).

Question 32

Do you think the tasks set out below are the most appropriate ways for the SRN to add value to the implementation of the SRDP? Y/N

- | | |
|---|------------|
| a)SRN website | Yes |
| b)Gathering of good programme examples | Yes |
| c)Disseminating information to the public | Yes |
| d)Organisation of events | Yes |

Are there other activities or services you would like to see the Scottish Rural Network provide? Please specify

Question 33

Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities? Y/N

Not Sure

If No, please explain your reasons

The idea sound good in principle but we would like to see more detail. In particular: what are the benefits of participation for non-statutory stakeholders, most of whom are very busy already?

Question 34

How would you rate your broad satisfaction with the proposals for the Scottish Rural Network?

(Very satisfied – very dissatisfied)

Quite satisfied

If you are dissatisfied, please briefly outline your reasons

We think there are several key questions yet unanswered

Who will be able to “join” the SRN, and how, and what will membership mean? What are the governance processes of the Advisory Board – will it be established by invitation (of the Cabinet Secretary?) or by election from the membership?

How will it relate to existing structures and organisations, notably the Scottish Rural Parliament?

Our view is that the SRN should be as open and inclusive as possible, and “owned” by its stakeholders, rather than by Government.

Whilst there may be value in a dedicated, Scottish Government Network Support Unit, we think as much of the practical activity of the SRN should be outsourced to organisations already active in rural networking.

We are not convinced of the need for a dedicated LEADER network managed through the SRN.

Question 35

How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?

If you are dissatisfied, please briefly outline your reasons

Question 36

Information used to monitor and evaluate the SRDP will be gathered from a mixture of data sources. Three key data sources required to capture monitoring and evaluation data are summarised below. We would welcome feedback on the approach outlined.

Data Source

Indicators

| | |
|--|--|
| The application form, claims form or Integrated Administration and Control System for land use information on agri-environment options | Will capture majority of information required for the output indicator suite. Will also capture some result and impact indicator information. |
| Existing surveys administered by the Scottish Government such as the agricultural census and farm accounts | These existing data sources will be utilised and potentially amended to capture the information required for monitoring, linking to other datasets to enhance the analysis. |
| Bespoke surveys or other data sources | These sorts of surveys are more likely to be targeted at collecting information for impact indicators and evaluation of the programme. They will be designed to address any data gaps. |

Question 37

Are there any other data sources which could inform the impact of the programme?
Y/N

If Yes, please specify

Question 38

The Scottish Government has identified a number of gaps in the indicator requirements and has set out plans for addressing these gaps, outlined below. We would welcome feedback on the proposed approach to filling the gaps in the data (including other data sources) required by the European Commission.

| Indicator Type | Indicator | Proposed Approach to Address Data |
|------------------|---|--|
| Impact Indicator | Greenhouse gas emissions from agriculture | Method being devised under the 2007-2013 programme on-going evaluation contract, which we may be able to |

| | | |
|------------------|----------------------------------|---|
| | | implement going forward. |
| Impact Indicator | Water abstraction in agriculture | It should be possible to add this to the Survey on Agricultural Production Methods Survey |
| Impact Indicator | Water quality | Method being devised under the 2007-2013 programme on-going evaluation contract, which we may be able to implement going forward. |
| Impact Indicator | Soil quality | EC recommend utilising the Land Use/Cover Area frame Survey but it is likely we would require expert advice as well. |
| Impact Indicator | Soil erosion | EC recommend utilising the Agro-environmental indicator but it is likely we would require expert advice as well. |

Question 39

Are there any other gaps that you wish to make us aware of? Y/N

If yes, please specify

Question 40

Are there any other data sources which could help us fill the data gaps?

If Yes, please specify

Question 41

We would welcome comments on the BRIA

Question 42

We would welcome comments on the EQIA