

**Rural Development Programme for Scotland 2007-2013  
Consultation Response  
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I am responding as the representative of an organisation  
I am happy to have this response made public  
CWA is more than happy to enter into dialogue with Scottish Executive personnel on this subject.

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**General**

- The SRDP as a whole, as well as the measures contained within it, must be consistent with the Scottish Executive's objectives for sustainable development, set out in the Sustainable Development Strategy. The SRDP must seek to go beyond this 'minimum standard' approach and present an integrated programme where measures benefit each of the three cross-cutting elements of sustainable development.
- Tier 1 payments, which are economic payments, dwarf Tiers 2 & 3, and have little to do with delivering public benefit. In the interests of balance Tiers 2 & 3 should prioritise social and environmental strands of sustainable development, and deliver public benefits. Otherwise an opportunity to deliver wider Scottish Executive policies, such as Land Reform and the development of community involvement, will be missed.
- The SRDP is the key vehicle to deliver the Scottish Executive's commitments on a raft of environmental requirements and objectives. These include the Gotheberg agreement to halt biodiversity loss by 2010; the objectives of the Water Framework Directive; Natura 2000; European Union forest policy; commitments under the Kyoto protocol on climate change; the European Landscape Convention; and the Nature Conservation (Scotland) Act 2004, the Scottish Biodiversity Strategy, the Sustainable Development Strategy, the Organic Action Plan, The Land Reform (Scotland) Act 2003, Ancient Monuments & Archaeological Areas Act 1979, The Scottish Outdoor Access Code and the SE Physical Activity Strategy. SRDP measures that contribute to these objectives must be prioritised.
- The consultation is being conducted before we are fully aware of the funding that will be available for SRDP, however the "massaging of expectations downwards" suggests very limited funding. This places on the Scottish Executive an increased obligation to ensure that the SRDP delivers truly sustainable development to the rural communities of Scotland.
- A 'public goods test' must be applied to prioritise measures for inclusion in the SRDP. Those measures whose outcomes are not primarily public, but private or sectoral benefits, should not be included.

- Planned outcomes for all SRDP measures are vital. The best value for public money can only be achieved through incorporating appropriate levels of planning to deliver the desired outcomes.
- Forestry Commission Scotland's activities will be within the scope of the SRDP. FCS have taken steps to ensure that their activities deliver a wide range of public benefits, and have developed mechanisms to ensure that they work with communities. This example should be more widely adopted by the SEERAD "family" and this document.

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### **Less Favoured Areas Support Scheme (LFASS)**

**Do you agree with the suggested approach for ensuring that payments are only made in respect of land that is being actively farmed? If not what alternative would you suggest?**

Community Woodland Association is concerned that this will act as a considerable disincentive to the management or expansion of woodlands.

We suggest that payments should also be made in respect of land that is being managed as woodland, or converted to woodland.

**Do you agree with the proposals to give greater weight to "very fragile areas"**

No.

We would prefer greater weight to be given to fragile areas as well.

### **Land Management Contracts (LMCs)**

**Do you agree with the national objectives identified in Annex C?**

Yes, but the key to effective LMC delivery will be the balance of measures adopted, and the structures of targeting, priority-setting, planning and advice that accompany them. Paragraph 32 refers to finite resources and selecting from measures which will make the clearest contribution to priority objectives, without detailing how this will be done.

**Do you agree with the proposed integration of schemes into LMCs?**

CWA supports the integration of existing schemes within LMCs, if it will provide a simplified and integrated delivery system for funding, planning and advice.

**Are the proposed lists of Tier 2 and Tier 3 measures in Annexes D and E suitable for the delivery of LMC objectives on: i) economic issues ii) social issues iii) environmental issues?**

No.

In addition to the guiding principles outlined in paragraph 19 of the consultation document, a 'public goods test' should inform the selection of measures submitted as part of the SRDP. Those measures where the primary beneficiary is the individual business, the sector, or other private interests, should not be prioritised for SRDP funding

In order that the best value for the public funding channelled through the SRDP is achieved, measures that have multiple outcomes might be prioritised. For example, catchment management proposals might contribute to objectives for flood management, diffuse pollution, climate change and biodiversity.

**Is there an appropriate balance between the proposed economic, social and environmental measures for LMCs?**

No.

LMCs are comprised of three tiers. Tier 1 is an essentially 'economic' payment, and on a national funding level it outweighs the higher two tiers by a factor of around 4:1. Therefore, the balance of LMCs must be re-dressed towards social and environmental payments in Tiers 2 and 3, in order that LMCs contribute properly to sustainable development objectives.

**Do the proposed measures encourage an integrated approach compatible with sustainable development?**

There is currently no mechanism proposed for LMCs that would create an integrated approach consistent with the principle of sustainable development, which does not rest with the proposed measures themselves. In themselves, neither do the measures go any way towards encouraging an integrated approach. Some measures in the proposals may be harmful to one aspect of sustainable development whilst encouraging another, unless proper locational and other targeting is inherent. For example, measures aimed at biomass, such as woodland creation, can be harmful to biodiversity unless these are targeted at supporting environmentally sustainable crop design and management and are located in areas where they avoid environmental harm. Mechanisms to encourage such an integrated approach should be built into the LMC model, to ensure delivery through LMCs contributes to sustainable development.

Whole Farm Planning would allow the successful integration of measures at farm or croft level. Without such a system of planning, and accompanying advice, there is no overarching mechanism to ensure sustainable development is an objective at the level of the holding. Although the proposals for Rural Development Frameworks for Tier 3 do propose some options for plans, the proposals do not contain plans for Tier 2 of LMCs. There is no mechanism at all to guide the selection of Tier 2 measures in the existing LMC Menu Scheme, therefore no guarantee that the overall scheme will not be skewed in terms of measures. This lack of planning should not continue into Tier 2 of LMCs from 2007 onwards, or the Executive's aims contained within the Sustainable Development Strategy will not be achieved. Further, it is hard to see how the Scottish Executive would be able to assess the suitability of applications or monitor and evaluate the effectiveness of its expenditure, without a system of planning that extends beyond Tier 3.

We propose that, in the interim before a coherent system of Whole Farm Planning can be established, a basic audit and plan should be a pre-requisite for entry to Tier 2. Basic elements would include the mapping of habitat features and their condition, the existence of key species, an audit of archaeological features, and the mapping of key sites for community development, access, recreation and tourism importance. A basic plan or set of target notes would highlight where priorities for action should be.

Collaborative LMC applications, at a landscape or catchment scale, also have the potential to ensure sustainable development is taken into account at this wider scale. Testing for the sustainability of collaborative applications should be a criterion for their prioritisation within LMCs, as should be the case for individual applications. Community Woodland Association supports the encouragement of applications at the landscape or catchment scale, as they have the potential to deliver for the range of SEERAD environmental objectives in an integrated way.

**Should there be a mechanism for ensuring that land managers adopt a spread of measures from Tier 2?**

yes

**Do you agree with the list of capital items as proposed in Annex G?**

The capital cost associated with the items will be very significant. Unfortunately these are not given.

- 51 There's some duplication on marking deer fences.
- 60 Native trees can feature in Designed Landscapes
- 60 3m strim can be too wide in a wood & where it is prominent in the landscape

## **LEADER**

### **Should the LEADER mechanism be used to deliver across all the Axes?**

Yes.

LEADER has introduced some successful innovative approaches to stakeholder engagement and the support of community based initiatives. The successful elements of LEADER should be introduced to the SRDP to ensure that real benefits are delivered to meet local needs.

### **How can LMCs and LEADER be administered to deliver mutually supportive approaches to rural development?**

For the "on the ground" approach to work effectively in rural Scotland, it needs to deliver on two priorities

- 1 it must effectively engage with local communities, and work with (not for) them to deliver sustainable development
- 2 it must reduce administrative confusion by, at the least, not setting up another series of boundaries, committees and structures. For example, in Argyll the RPAC might cover Argyll with Perthshire (as with the forestry forum), or with Stirling (as with SNH area), or South West (as SNH region) or Argyll & Lochaber (as with LEADER) or Highland (as health), or "old" Argyll (as with SEERAD), or "new" Argyll & Bute (as Argyll & Bute Council), or Highlands & Islands (as HIE), or Strathclyde (as police, archaeology, fire), or parts of both North & South Scotland (as Forest Enterprise). The aspiration should be to ensure that these overlaps are removed.

## **Implementation**

### **Do you agree with the proposed Rural Development Framework approach?**

Yes.

Further this approach should be adapted to fit Tier 2.

### **Do you think that the proposed RPAC approach would be an effective means of delivering regional and local priorities while meeting national objectives?**

See above

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### **Would RPACs be an appropriate approach for applications under all of the Axes?**

If properly developed

### **Which interests do you think should be represented on the RPACs?**

The three "pillars" of sustainable development should be equally represented.

SEERAD could learn from the moves that Forestry Commission has made towards gaining representation from different sectors.

**Do you agree with the proposed system of guidance on regional and local priorities to enable greater targeting in the SRDP.**

Yes

An early priority, however is to pin down the regions. Para 57 has the SEERAD regional office as the regional contact. Para 60 talks of ecological regions, and introduces river catchments or geographic areas as yet another layer. Para 60 also introduces “local” stakeholders in addition to regional stakeholders, implying another organisational layer.

**What mechanisms could be put in place to ensure that the advice provided is of a high standard that will help achieve the policy outcomes expected?**

Access to high quality advice is key to the development of appropriate schemes.

There is some confusion in this section.

On the one hand paragraph 62 states that there are a number of public and private sector bodies and individuals providing advice, and that the aim is to integrate existing sources of advice

However 63 omits the private sector (and non profit distributing advisory organisations such as Community Woodland Association, Farming & Wildlife Advisory Group and Scottish Native Woods). Non profit distributing organisations have a key role in delivering social and environmental advisory support, and this should be recognised and assisted by the Scottish Executive.

Annex H Code 115 of Common Output Indicators has “number of newly set up management, relief or advisory services” as an indicator. This might militate against the use of existing sources of advice.

**What areas of activity should the SRDP support in order to ensure that it complements activities supported through other funding streams?**

Scottish Executive needs to be clear about mechanisms for delivering support for Natura 2000 sites, which might be funded by SRDP, LIFE+, structural funds and domestic funds.

**Equality and discrimination**

This programme fails to properly address these issues and will make very little, if any, difference to ethnic minorities or the disabled. Even with simple things like access, only general public access is mentioned.

**Monitoring and evaluation**

Monitoring is key to determining the level of public benefit delivered. Transparency in publishing this information is also important.

CWA is particularly concerned to ensure that effective ways of monitoring real community benefit and involvement are developed and included in monitoring measures.

Particularly in light of the budgetary constraints the review of the public benefits delivered by LFASS is to be welcomed.