

**Scotland Rural Development
Programme (SRDP) 2014-2020
Stage 2: Final Proposals**

**Scottish Wildlife Trust
Response**



The below wording is a copy of the text submitted to the Scottish Government via its on-line consultation portal.

How would you rate your satisfaction with the budget as a whole? Please tick the appropriate box in the online questionnaire.

Disagree (very disappointed)

Question 1

If you are dissatisfied please outline your reasons (in the space given in the online questionnaire).

The Scottish Wildlife Trust is unhappy with the total budget allocated to the SRDP. SRDP funding does more to protect and enhance Scotland's Natural Capital than the single farm payment does, it helps maintain the flow of ecosystem services on which we depend and it helps support a wider rural economy. The Trust was fully supportive of a transfer of 15% from Pillar 1 to Pillar 2 and the Scottish Governments decision to only transfer 9.5% is deeply disappointing to Trusts 35,500 members.

The decision not to transfer the full 15% from Pillar 1 to Pillar 2 means that nearly £220 million of CAP funding will remain in Pillar 1 where it cannot be easily targeted at environmental objectives (like reducing flood risk) and where it is very hard to provide taxpaying citizens with any evidence that they are receiving value for money.

The SRDP is vitally important in helping Scotland comply with EU directives such as the Birds, Habitats, Floods and Water Framework Directives and implementing Scotland's Land Use Strategy. SRDP funding is also hugely important in helping Scotland meet its biodiversity targets as stated in the "2020 Challenge for Scotland's Biodiversity" (2020 Challenge) which is Scotland's response to the internationally binding Aichi targets. The main aim of the 2020 Challenge is to "protect and restore biodiversity on land and in our seas, and to support healthier ecosystems". The 2020 Challenge document identifies SRDP funding as being the major source of funding for financial incentives for

land managers to help them tackle diffuse pollution, alleviate flood risk, protect soils, restore and enhance peatlands and expand native woodland cover.

By not transferring appropriate levels of funds to Pillar 2 the Scottish Government is sending confusing signals to land managers by, on one hand, appearing supportive of the above listed objectives, but on the other hand, significantly underfunding the only pot of money that can have a noteworthy affect

Please also refer to the answer to question 9 below

Question 2

Are you broadly satisfied with the new application and assessment process for land based investments outlined in section 5?

Please tick the appropriate box in the online questionnaire.

Quite dissatisfied

The Trust is concerned that not enough weight is being given to land based investments that would provide the greatest environmental (and by extension social) benefit. The Trust would like to see a greater breadth of environmental knowledge amongst the case officers that evaluate applications this could be achieved by increasing knowledge within SGRPID or by using SNH to review applications.

The Trust understands, from the consultation document, that level two applications for forestry would be for applications above £75 000. This £75k “trigger” for more than one case officer to review the application is too high.

The application limit of one application, per scheme, per year might prove restrictive in landscape scale conservation scenarios for example living landscape programmes.

Question 3

Should support for farmers operating in constrained areas be continued through the SRDP? Please tick the appropriate box in the online questionnaire.

Other

With the small budget for agri-environment/climate schemes in mind, the Trust is of the opinion that the LFASS budget is too high. The Trust also thinks that that support mechanisms in the SRDP should be directed at farms that are most environmentally important and are the most economically disadvantaged. This would essentially amount to support for High Nature Value Farming. The Current LFASS supports the most productive areas this is against the ethos of the scheme.

Question 4

How would you rate your satisfaction with the proposals for the New Entrants Scheme? Please tick the appropriate box in the online questionnaire.

Neither satisfied nor dissatisfied

The Trust would like to see greater support for new entrants who want to support integrated pest management through the whole farm review and have aspirations for diversified, sustainable, agri business.

Question 5

Should a scheme be expanded to provide capital support to small farms

No

The Trust can see the merit in this and especially support for crofting, however, not all small farms are crofts and not all small farms provide the same environmental benefits that crofting does. More support should be made available for small farms by improving the SRDP application process and facilitating greater co-operative action.

Question 6

Is a 3 to 50 hectare range appropriate for defining a small land holding? Yes/No/No opinion. Please tick the appropriate box in the online questionnaire.

Question 7

Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees? Yes/No/ No opinion

Please tick the appropriate box in the online questionnaire.
If No please explain why (in the space given in the online questionnaire).

Question 8

How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme? Please tick the appropriate box in the online questionnaire.

Neither satisfied nor dissatisfied

Question 9

How would you rate your broad satisfaction with the proposal for the Agri- Environment-Climate Scheme? Please tick the appropriate box in the online questionnaire.

Dissatisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

The Scottish Wildlife Trust notes from the consultation document that the allocation for the scheme is proposed as £355 million, or approximately 27% of the future budget. This budget includes funds that have previously announced for peatland action – which the Trust strongly supports – but it should be kept in mind that this is not new money for agri- environment-climate schemes. This

figure also includes £10 million for co-operative action, whilst we have supported this from the outset and believe it is vital, this should be additional to the agri- environment-climate budget.

If you subtract these figures for peatlands and co-operative action it leaves £340 million or C.£48.5 million a year. As the Scottish Environment LINK stated in their letter to the Cabinet Secretary on the subject approximately £60 million per year is the minimum level of funding needed to meet targets on biodiversity, water quality and climate change.

Question 10

It is proposed to support forestry under six main areas as outlined in table 4 below. Please identify whether you agree with these broad areas. Please tick the appropriate box in the online questionnaire.

	Yes, should be included	No, should not be included	No opinion
Woodland Creation	X		
Agroforestry	X		
Tree Health	X		
Woodland Improvement Grant	X		
Process and marketing	X		
Sustainable Management of Forests	X		

Agroforestry and Tree Health options are welcomed, however, it is noted that no new funding has been made available which means that grants made under these options will reduce money for the creation and maintenance of new woodlands.

Question 11

We propose nine woodland creation options with support through standard costs. Should these be included? Yes/No/No opinion.

Please tick the appropriate box in the online questionnaire.

	Yes, should be included	No, should not be included	No opinion
Conifer		X	
Diverse Conifer		X	
Broadleaves	X		
Native Scots pine	X		
Native Broadleaved - W4	X		
Native Broadleaved - Other	X		
Native low density	X		
Small or Farm wood	X		
Northern and Western Isles	X		

In all woodland creation – including productive forestry - the principle of both species and genetic diversity should be upheld, not just to assist natural biodiversity, but also to build better resilience

from the risks of tree disease. Therefore we are recommending that diverse conifer should be promoted over monoculture conifer at all times.

The Trust warmly welcomes the new “Native low density” option as contributing to the creation of valuable habitats such as montane scrub.

Although the Trust supports the “Small or Farm wood” option we do highlight the absence of a compliance standard, such as the UK Forestry Standard for new woodland on agricultural land.

The Trust is supportive of W4 as long as it is not planted on peat depth greater than > 0.5 m and that there is no drainage system put in place to dry out the peatland habitat.

There should be encouragement to plant juniper.

Question 12

Are there any other woodland types that should be supported? Yes/No

Please tick the appropriate box in the online questionnaire. If yes, please specify (in the space given in the online questionnaire).

X	Yes
	No

The Trust notes that the NVC W4 (Downy Birch and Purple Moor Grass) habitat has been highlighted for its own category of support. Planting “on upland shallow peaty soils” like this could mean that valuable peatland habitats might be inappropriately planted rather than restored. However, the Trust does recognise that this is a natural habitat type but do not want to encourage planting on peatlands with a peat depth > than 0.5 m. No planting should involve draining or drying out of peatlands. An alternative option might be to create grant options for each of the UKBAP native woodland priority habitats; Upland Oakwood; Lowland Beech and Yew Woodland; Upland Mixed Ashwoods; Wet Woodland; Lowland Mixed Deciduous Woodland; and Upland Birchwoods.

Question 13

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

Please tick the appropriate box in the online questionnaire

If No, please briefly explain your reasons (in the space given in the online questionnaire).

X	Yes
	No

This was not an easy question for the Trust to answer as all of Scotland, and not just the CSGN area, should see equitable benefits from the SRDP. However, it is recognised that land values are often higher and under more complex pressures than some area of Scotland. The Trust also notes that

under previous incarnations of the scheme woodland creation did increase in the central belt with extra financial incentive.

The Trust recommends that under future RDP that any planting around urban areas is given an extra cost allowance due to the competing pressures on land management in these areas.

Question 14

What is your preferred option for Income Foregone in SRDP 2014 - 2020? Please tick the appropriate box in the online questionnaire.

Option 1

Option 2 IF Payments removed

Option 3

Please explain your choice (in the space given in the online questionnaire).

This simplifies things and could lead to potentially higher initial planting payments.

Question 15

Do you agree with the range of "other support" for woodland creation? Yes/No/No opinion.

	Yes, should be included	No, should not be included	No opinion
Tree shelters and fencing	X		
Improved stock for Sitka Spruce		X	
Bracken contribution	X		
Community woodland	X		

With regard to fencing, it should be as a last resort and deer densities should be kept at a level that mean woodland can flourish naturally. However, the Trust accepts that fencing is necessary in some instances until deer numbers are brought down to ecologically acceptable levels.

The Trust does not believe that the improved stock for Sitka Spruce option is one which is greatly taken up.

There are many other "stand alone standard costs" which might be considered too, such as biodiversity restoration.

Question 16

Should agroforestry be funded through the SRDP 2014 - 2020? Yes/No/No opinion. Please tick the appropriate box in the online questionnaire.

X	Yes
	No
	No opinion

It is disappointing that no new money has been put forward for this grant. The costs will mean a reduction in the budget for new woodland creation and maintenance, however, the Trust welcomes the new option.

The Trust would like to see a breaking down of the barriers between agriculture and forestry and believe that there are many social, economic and environmental objectives that can be met by having a more holistic, and less segregated, view of land management.

Question 17

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

Please tick the appropriate box in the online questionnaire.

	Yes
x	No
	No opinion

This cost should be funded through other measures.

Question 18

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

Please tick the appropriate box in the online questionnaire.

	Yes	No	No opinion
Long term forest planning – new	X		
Long term forest planning – renewal	X		
Reducing Deer impact	X		
Woodland Habitats and Species	X		
Restructuring Regeneration	X		
Non-Woodland Habitats and Species	X		
Natural regeneration	X		
Woodlands In and Around Towns	X		

The Trust supports all of these options and is of the opinion that for “Reducing Deer impact” an up-to-date Deer Management Plan should be compulsory for access to these grants.

Question 19

Should these areas be supported through the SRDP? Yes/No/No opinion.

Please tick the appropriate box in the online questionnaire.

	Yes, should be included	No, should not be included	No opinion
Small scale premium processing sector	X		
Equipment to increase harvesting in small undermanaged woods	X		
Equipment to increase capacity for steep ground harvesting	X		

This option could bring valuable support to small rural business and allow diversification. Support like this will be vital in the success of many landscape scale partnership projects such as the Coigach Assynt Living Landscape.

Question 20

Do you agree with the range of Sustainable Management of Forest grants?

Yes/No/No opinion.

Please tick the appropriate box in the online questionnaire.

	Yes	No	No opinion
Native woodlands	X		
Low Impact Silvicultural Systems (LISS)	X		
Public access	X		
Public access WIAT	X		
Livestock removal	X		
Woodland grazing	X		

Question 21

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

Quite satisfied

The Trust welcomes many of the above suggestions, however, there are concerns over budget allocations. The Trust is aware that specific detail still has to be agreed.

Question 22

How would you rate your broad satisfaction with the proposals for co-operation?

Please tick the appropriate box in the online questionnaire.

Quite satisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

The Trust has been calling for greater support for collaborative action for some time and we are pleased by the inclusion of support for co-op action. However, with the very limited funding available the Trust is concerned that there may not be enough money to satisfy demand. With this in mind, the Trust would like to see the focus of collaborative action on environmental and social objectives rather than purely economic benefit, for example peatland restoration.

Question 23

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

Please tick the appropriate box in the online questionnaire.

Quite satisfied

The Trust is tentatively “quite satisfied”, however, small business support should be targeted at business that is sustainable and does not erode Scotland’s natural capital.

Question 24

Do you agree with the proposal that we should continue to give significant support to the food and drink sector?

Yes

Please tick the appropriate box in the online questionnaire.

The SRDP should support local, small scale food producers that have a strong link to a healthy environment and help to build “Scotland the brand” as a nation that produces healthy, “green” produce in a healthy “green” environment.

Question 25

Selection criteria such as those listed above should apply to that support? Yes/No/No opinion. Please tick the appropriate box in the online questionnaire.

Question 26

Steps should be taken to streamline processes for food companies including a one stop shop for public support? Yes/No/No opinion

Please tick the appropriate box in the online questionnaire.

Question 27

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

Please tick the appropriate box in the online questionnaire.

Quite satisfied

Question 28

How would you rate your broad satisfaction with the proposals for LEADER?

Please tick the appropriate box in the online questionnaire.

Quite satisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

The Trust welcomes a focus on community action On climate change and would also like to see LEADER working towards protecting/enhancing natural capital. The focus of leader should not be on “sustainable economic growth” but rather on local needs such as access to the outdoors for all user groups and the use of the outdoors for learning.

Question 29

Do you agree with the range of options being included within KTIF scheme?

Yes/No/No opinion.

Please tick the appropriate box in the online questionnaire.

Question 30

How would you rate your broad satisfaction with the proposals for KTIF? Please tick the appropriate box in the online questionnaire.

Quite satisfied

The Trust supports skills development and monitor farms.

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

Question 31

How would you rate your broad satisfaction with the proposals for the Advisory Service? Please tick the appropriate box in the online questionnaire.

Quite dissatisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

Advice is necessary to ensure that agri-environment schemes are implemented in a sensible manor and that they achieve maximum value for tax payers money. The Trust supports the proposed structure for advisory services. However, the trust does not think that the budget allocated to advisory services is sufficient and would like to see this at least doubled.

Question 32

Do you think the tasks set out above are the most appropriate ways for the SRN to add value to the implementation of the SRDP? Please tick the appropriate box in the online questionnaire.

Are there other activities or services you would like to see the SRN provide? Please specify (in the space given in the online questionnaire).

SRN Website	Y
Gathering of good programme examples	Y
Disseminating information to the public	Y
Organisation of events	Y

Question 33

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

Yes

Please tick the appropriate box in the online questionnaire.

If No please explain your reasons (in the space given in the online questionnaire).

Question 34

How would you rate your broad satisfaction with the proposals for the Scottish National Rural Network? Please tick the appropriate box in the online questionnaire.

Quite satisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

Question 35

How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme? Please tick the appropriate box in the online questionnaire.

Quite satisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

Question 36

We would welcome feedback on the approach outlined in Table 9 (in the space given in the online questionnaire).

The Scottish Wildlife Trust is of the opinion that with such a huge investment of public money (over £1 bn) it is essential to have in place a comprehensive monitoring and evaluation package to show if funds are providing value for money and having the desired effect.

Question 37

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

No.

Please tick the appropriate box in the online questionnaire.

If yes, please specify (in the space given in the online questionnaire).

364. Additionally the Scottish Government has identified a number of gaps

Question 38

We would welcome feedback on the proposed approach to filling the gaps in the data required by the European Commission, outlined in Table 10 (in the space given in the online questionnaire).

N/A

Question 39

Are there any other gaps that you wish to make us aware of? Yes/No

Please tick the appropriate box in the online questionnaire.

The Trust agrees with the concern of Scottish Environment LINK that there is no mention of biodiversity indicators in Table 10. Biodiversity is a key metric involved in measuring the success of SRDP.

If yes, please specify (in the space given in the online questionnaire).

Question 40

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

Yes

Please tick the appropriate box in the online questionnaire.

If yes, please specify (in the space given in the online questionnaire).

Data held by renewables developers may be useful.

Question 41

We would welcome comments on the BRIA (in the space given in the online questionnaire).

N/A

Question 42

We would welcome comments on the EQIA (in the space given in the online questionnaire).

N/A