

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

Scotland's National Park Authorities

Title Mr

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

ORGANISATION WITH PRIMARY INTEREST IN:

Local Authorities and other local public bodies

4. Permissions - I am responding as...

/ Group/Organisation

Please tick as appropriate

(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?

Yes

(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?

Yes

**Consultation on Scotland Rural Development Programme (SRDP) 2014-2020
Stage I: Initial Proposals**

Consultation Response from Scotland's National Park Authorities – Officer Response

Introduction

Scotland's National Park Authorities at Cairngorms and Loch Lomond & The Trossachs welcome the opportunity to respond to this consultation.

Loch Lomond & The Trossachs and Cairngorms National Parks were established in 2002 and 2003 respectively. The National Parks are 'Category V' Parks under the International Union for Conservation of Nature classification for Protected Areas. A 'Category V' Protected Area is 'managed mainly for landscape conservation and recreation. It is an area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.'

An active and sustainable rural economy is crucial to the landscape, biodiversity, tourism, recreation, communities and cultural value of our National Parks. European and national policies and incentives have a direct influence on our ability to achieve our four aims which are:

- To conserve and enhance the natural and cultural heritage of the area
- To promote sustainable use of the natural resources of the area
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public
- To promote sustainable economic and social development of the area's communities

Summary

The Scotland Rural Development Programme (SRDP) is a key mechanism by which public funding is directed to support rural businesses and communities within the National Parks.

Both National Park Authorities play significant roles in regional delivery of the SRDP, by promoting to and advising rural businesses, active participation in Regional Project Assessment Committees and Local Action Groups, advising Case Officers on applications within the Parks and, in some cases, acting as agent for groups of applicants in order to proactively deliver National Park priorities at a landscape scale.

Our comments below focus on ways by which our stakeholders' shared objectives, reflected in National Park Partnership Plans and supporting documents, could be achieved more cost-effectively. Our three key recommendations are therefore:

1. Funding regionalised to the National Parks, that can thus be geographically targeted at a fine scale, in alignment with the priorities set out in National Park Partnership Plans which have been agreed with Scottish Ministers and our local stakeholders;
2. Improved application processes, through simplifying and localising assessment of applications, and by enabling appropriate third party applications for collaborative applications.
3. Improved availability and quality of advice provision from the public and private sectors, focussed on holistic and integrated business planning and public benefit outcomes.

Our responses to Questions 1-29 below are set within this 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?

Agree.

We accept the distillation of European and Scottish themes and priorities into three funds:

1. Competitiveness, innovation and jobs
2. Low carbon, resource efficiency and environment
3. Local development and social inclusion

These funds broadly cover the four aims of National Parks in Scotland which are:

- To conserve and enhance the natural and cultural heritage of the area
- To promote sustainable use of the natural resources of the area
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public
- To promote sustainable economic and social development of the area’s communities

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?

Agree, for the reasons provided in the consultation paper.

We would be happy to discuss with Scottish Government the potential mutual benefits of National Park Authority representation on the Programme Monitoring Committee under the next SRDP.

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?

We consider the following RDR Articles to be priorities:

Article	Description
15	Knowledge transfer and information actions
16	Advisory services, farm management and farm relief services
18	Investments in physical assets
20	Farm and business development
21	Basic services and village renewal in rural areas
22	Investments in forest area development and improvement of viability of forests
23	Afforestation and creation of woodland
24	Establishment of agro-forestry systems
26	Investments improving the resilience and environmental value of forest ecosystems
27	Investments in new forestry technologies and in processing and marketing of forest products
29	Agri-environment-climate
32	Payments to areas facing natural or other specific constraints
33	Designation of areas facing natural and other specific constraints
35	Forest environmental and climate services and forest conservation
36	Cooperation

As a general point, we consider that the minimum number of Articles required to achieve objectives should be adopted. For example, where an objective can be achieved by more than one Article (e.g. environmental management of forests under Articles 26 or 35), only

one of the Articles need be adopted for this purpose. This decision should be made taking into account factors such as cost-effectiveness, both in terms of rates of aid but also simplification of administrative requirements.

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?

Strongly agree, for the reasons provided in the consultation paper.

The National Park Authorities strongly believe that due to their nationally important status, National Parks should be considered 'a geography' for targeted SRDP funding. We also believe that further targeting is desirable and achievable within the National Parks, based on existing regionalised strategies, including the National Park Partnership Plans, Local Plans, Biodiversity Action Plans, etc, to which local stakeholders are already signed up to deliver. These strategies are derived from and supported by a wide range of good quality data-sets that facilitate a geographically targeted approach at a fine scale.

The Cairngorms LEADER Local Action Group is unique in Scotland as it follows geographic rather than local authority boundaries. As such, it is a successful example of delivering geographically targeted investment. The consultation process associated with National Park partnership planning is an extremely strong basis for Community Led Local Development and LEADER in the Cairngorms National Park. This provides a compelling case for maintaining a Local Action Group specific to the Cairngorms National Park and extending the principle of geographically targeted investments.

Where there is potential for significant public benefits to be accrued, targeted investment should include, as well as funding, the necessary proactive advisory support – see our response to Questions 25 and 26.

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

No comment – from the level of detail provided in the consultation paper, it is not clear to us the advantages and disadvantages of small local businesses applying to LEADER through Local Action Groups as opposed to applying to the 'competitiveness fund' through a new regional or national body.

On a wider point, the National Park Authorities have a strong track record of working with Local Action Groups as well as with small local businesses. In particular, Cairngorms National Park Authority has aided delivery of the current LEADER programme in partnership with a Local Action Group established specifically for the National Park area. The Group's Local Development Strategy has a mutual relationship with the National Park Partnership Plan. The successes of the LEADER programme within Cairngorms National Park demonstrate the advantages of aligning the Local Action Group and/or Local Development Strategies with the National Park, making the most of funds to deliver agreed priorities for the region.

We would therefore be happy to discuss the subject of Question 5 in more detail with Scottish Government.

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, for the reasons provided in the consultation paper.

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, for the reasons provided in the consultation paper.

However, the National Park Authorities support the principle of maintaining a non-competitive annual SRDP allowance per business for which all options of the (possibly re-branded) Rural Priorities scheme are available, but with a condition that those selected implement agreed priorities from an agreed holistic Whole Farm Review or equivalent (see our response to Question 25).

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?

No comment – the National Park Authorities are not sufficiently familiar with the Forestry Challenge Funds.

Should the objectives and funding for ‘Forestry for People’ be provided by LEADER in the next SRDP, we recommend that Scottish Government provides advice to Local Action Groups regarding the merits of recruiting new members with sufficient knowledge to advise on these matters.

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?

No comment – the advantages and disadvantages are not clear to us from the level of detail provided in the consultation paper.

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 in principle, subject to further information and consideration.

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, providing that the Crofting Support Scheme includes measures only very specific to crofting (or small landholdings).

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 in principle, subject to further information and consideration.

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

Agree, for the reasons provided in the consultation paper.

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

Strongly agree, for the reasons provided in the consultation paper.

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

Agree.

However, the National Park Authorities do not agree with administration in line with current Rural Priority scheme regional boundaries. At present, Cairngorms National Park is covered by three Rural Priority scheme regions and Loch Lomond & The Trossachs National Park is covered by four. This arrangement does not easily facilitate targeted delivery by the National Park Authorities or any of our stakeholders of the priorities in our existing regional strategies (e.g. National Park Partnership Plans). Because of the existence of these regionalised strategies, the high levels of data held for these areas and their national significance, the National Park Authorities contend that National Parks should be considered as regions for the purposes of the (possibly re-branded) Rural Priorities scheme.

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

Agree, for the reasons provided in the consultation paper.

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

Agree, subject to transparency, objectivity and consistency of decision-making.

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

Agree, subject to the evidence used to allocate budgets being based on opportunities to deliver SRDP objectives, not on historic SRDP spend. The latter may be a symptom of numerous factors, such as availability and/or quality of public and private sector advice.

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

The most important factors are that:

- online and printed guidance is clear and unambiguous;
- good quality advice is available from the public and private sectors (the latter potentially proactively funded through the SRDP for priorities in targeted areas – see our response to Questions 25 and 26).

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, subject to the quality and relevance of the information provided. Existing data-sets should be examined and any data relevant and useful should, subject to licensing, be provided to enquirers from a single source.

Provision of this basic data must be backed up with good quality on-farm advice – see our response to Questions 25 and 26.

Should the Scottish Government wish, prior to national roll-out, to pilot the approach of providing descriptive maps, the National Park Authorities would be very keen to discuss with Scottish Government and our local stakeholders the possibility of piloting within the National Parks, given the breadth and quality of data held for these areas.

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?

Strongly agree, for the reasons provided in the consultation paper.

As an example, part of the solution to an environmental issue may involve infrastructural investment (e.g. a funding contribution towards the cost of a livestock shed required to reduce over-winter grazing pressure on heathland).

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

Strongly agree, for the reasons provided in the consultation paper.

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?

Strongly agree, for the reasons provided in the consultation paper.

There should also be an expectation and in principle acceptance of third party applications that have emanated from the private (or third) sector.

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

Agree in principle – this should form part of the considerations regarding funding the provision of advice (see our response to Questions 25 and 26).

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?

Strongly agree.

Whole Farm Reviews should be as holistic and integrated as possible, examining all strengths, weaknesses, opportunities, threats and inter-relationships across existing and potential new enterprises and business structures. Ideally, the themes to be considered should be informed by the requirements of the business and the land, not by arbitrary restrictions (e.g. to biodiversity, environment, forestry, water pollution control and waste management as per Question 25) of the funding mechanism. For example, for some businesses, energy efficiency, or diversification into energy production or tourism may be the most important opportunities to consider.

Loch Lomond & The Trossachs National Park Authority are currently working with a number of businesses on Whole-Farm and Whole-Estate Plans. These are taking a very holistic and integrated approach, utilising internal expertise complemented by advice from external specialists in agriculture, conservation, energy, forestry and recreation. We are happy to share our experiences with Scottish Government to aid development of a revised Whole Farm Review Scheme and advisory service.

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

Strongly agree.

We recognise the significant cost of making a service as described at Question 25 above available to all farm businesses in Scotland. However, we feel that a significant investment under this SRDP to a business planning stage would prove cost-effective in terms of public and rural economy benefits accrued through the term of not just this but subsequent SRDPs. Following a significant initial investment, the costs required towards the planning stages under subsequent SRDPs would be reduced.

It is possible also that contributing to the cost of advice at the planning stage may ultimately save SRDP or other public funding where it is identified in the business plan that grant aid is not required or that funding can be derived from another source.

We welcome Scottish Government's scrutiny of the quality and availability of advice to rural businesses – where advice is directly or indirectly publicly funded, this should be continually monitored and improved. A robust and outcome-focussed accreditation service would serve this purpose.

Both National Park Authorities work with partners to take a proactive approach to the provision of advice to rural businesses. We are happy to discuss this in more detail with Scottish Government, including any potential opportunities to pilot new and innovative methods of delivery.

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

Agree in principle, subject to further information and consideration.

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?

Strongly agree, for the reasons provided in the consultation paper, with maintenance of the current level of transfer of 14% (or an increase to 15%) of Direct Payments into the SRDP.

More significant gains in increasing the SRDP budget could be achieved by the Scottish and UK governments seeking a fairer share of Common Agricultural Policy Pillar 2 funding for Scotland: Scotland's current rural development spend equates to only €6 per hectare – the lowest within the EU and eight times short of the EU average.

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.

No comment.

This joint response from Scotland's National Park Authorities has been compiled as an officer response – please direct any initial enquiries to:

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