

Rural Development Programme for Scotland 2007-2013
CNPA draft response 30 June 2006

1. Our response to the consultation on the Rural Development Programme for Scotland is in three parts:
 - i) Introduction, which sets out the background and describes the CNPA policies that have informed the detailed responses to the questions posed in the consultation, and the pilot project proposal
 - ii) Responses to the questions asked in the consultation
 - iii) A pilot proposal for how LMCs can be regionalised in the Cairngorms National Park in 2007-2008

Introduction

The role of the CNPA

2. The general purpose of the CNPA is to ensure co-ordinated delivery of the four aims of the Cairngorms National Park. To achieve this, a National Park Plan is being prepared for submission to Scottish Ministers later this year. All public bodies, including the Scottish Executive, will be required to have due regard to the National Park Plan in undertaking their activities in the Cairngorms. The Park Plan will include priorities for action for the public sector, including the Scottish Executive, for the period 2007-2013.
3. It is essential that this action programme both reflects current and forthcoming policy changes and makes the most of opportunities offered by them. The Scottish Rural Development Programme (SRDP) could be a key tool for delivering the National Park Plan. This response explores how it can be implemented to deliver these priorities in the CNP.

The proposed Priorities for Action

4. The Draft Park Plan proposes 7 priorities for action:
 - a) Conserving and enhancing the Park's biodiversity and landscapes
 - b) Developing sustainable deer management
 - c) Developing integrated land management
 - d) Providing high quality opportunities for outdoor access
 - e) Making housing affordable and sustainable
 - f) Making tourism and businesses sustainable
 - g) Developing awareness and understanding of the Park.
5. The SRDP provides an opportunity to help deliver each of the seven proposed Priorities for Action, with particular opportunities for developing integrated land management. Our aim is that the SRDP helps shape a sustainable future for farming, forestry, crofting, field sports, those that manage that land for nature conservation objectives and for the local communities and businesses and those that visit the Cairngorms National Park. We welcome the proposal made in paragraph 28 which

proposes moving to a system where LMCs become the principal gateway to support land management, business development, diversification and wider rural development measures. However, this needs to be done in a measured way.

6. The SRDP proposes a huge change in the way that public sector support is delivered to rural Scotland. These changes will require a much wider engagement than current SRDP, which is focused on farmers and crofters. We anticipate that the changes will take several years to occur.
7. We also perceive that there will be many more changes in land management support and the Single Farm Payment, and that this is only the first step. For example, there will be changes to LFASS by 2010 and further EU budget discussions in 2008 which may well influence the SFP. These changes will have a profound influence on the special qualities of the Cairngorms, and we wish to set up mechanisms as early as possible in the process, so that we can influence further developments, to minimise threats and make the most of opportunities.
8. We note that National Parks are not mentioned in the consultation paper. We plan to continue working closely with the Scottish Executive to ensure that the implementation of the SRDP and the development of the National Park Plan are fully integrated

Relevant action to date

9. The need for integrating public sector activity on land management was recognised as an early priority for the CNPA. Action to date has focused on the following areas:
 - a) *Identifying the priorities among the public benefits that land managers can and could deliver.*

For example, a Draft Priority Statement for Land Management Contracts was produced in October 2005, after an open consultation with a range of land managers, local and national stakeholders and public agencies including the Scottish Executive.
 - b) *Influencing international, national and local policies and programmes so that they support land managers in their efforts to deliver public benefits.*

Many policies and programmes have clear opportunities for influencing locally so that they meet the needs of the CNP, for example SNH's natural care schemes. However, the current SRDP schemes are administered nationally and so cannot be influenced to deliver the needs of the CNP. For example, applications for the Rural Stewardship Scheme are ranked nationally: no applications from the CNP were successful in 2005, despite its biodiversity being one of the reasons for National Park designation. We have therefore focused efforts on maximising opportunities for enabling these national schemes to be changed to help deliver the four aims of the CNP. This has included work on the reform of CAP, the development of the RDR Regulation, the future of National Nature Reserves in the Cairngorms. The eventual harmonisation of all EU, national and domestic funds, for example EU structural Funds, in the Park area is also a priority for the CNPA.

c) *Delivery of action*

We have run a successful Land Based Business Training Project which we are using to provide training to a wide range of partners on the priorities for the CNP. We have had a close involvement in the Cairngorms LEADER + Programme. This includes hosting the project team, co-ordinating bids and having lead financial responsibility. The Cairngorms LEADER + programme has been highly rated and has distributed a large amount of money. It has also had links to land management, for example through developing farmers markets.

10. The CNPA's policy on regionalisation is:

To deliver our general purpose of co-ordinating the delivery of the four aims of the CNP, it is essential that the new SRDP be implemented in a way that allows for both priority setting and delivery at the Cairngorms National Park scale.

Funding

11. Given the likely very limited availability of funding within the SRDP, the CNPA proposes that there is a strong case for making enhanced public support available to land managers in national parks above those in the rest of Scotland. The CNP, and Loch Lomond and the Trossachs National Park have been designated as special places, and require adequate support to conserve and enhance the special qualities produced by land managers. In addition, the funding modulated from farmers and crofters in the Park must as a minimum be reallocated here.
12. We have been gathering information about the level of funding currently delivered in the Park through the RDP, LEADER + and other schemes, including public administrative costs. This has proved a challenging exercise and is incomplete. We suggest this is a priority as without this information, it is difficult to monitor the impacts of change, and ensure efficiency and no loss of public benefits. We will pursue this as a priority over the next few months.
13. The changes from the old SRDP to the new one should be carefully considered to prevent any loss of current public benefits delivered. For example, the LFASS may be pivotal for maintaining many cattle systems that deliver a wide range of public benefits including biodiversity and landscape qualities. Any changes to the future of the LFASS should be designed to ensure that there is no loss in the public benefits delivered.
14. The CNPA is willing to participate in a pilot project to make the SRDP deliver more public benefits in the CNP. However, it is essential that participants are not treated less favourably than in other parts of Scotland. They must not lose out through participation in such a project.
15. Where national and regional schemes are integrated into LMCs and the SRDP, then it would be important for their funding levels to be transferred into the SRDP pot too. In other words, we do not wish to see the SRDP funding being used in place of

domestic commitments. For example, if Scottish Natural Heritage's Natural Care Scheme is transferred, then its funding must be transferred too.

16. We have a particular concern about the Capital Grants Scheme. This scheme is currently suspended and we have been advised that its future will be considered through the measures in the SRDP. If it does go ahead in the SRDP from 2007-2013, and given that it was 50% funded by the Scottish Executive, then we would ask for reassurance that there would be a sufficient level of funding made available by the Scottish Executive to be transferred into the RDP budget for the 2007-2013 period.
17. We support the principles listed in paragraph 19, with one exception. The fifth bullet point states that funding must deliver outcomes that would not happen otherwise and make a significant and, wherever possible, measurable improvement. We argue that in some cases it may be appropriate to provide funding to maintain rather than make a significant improvement. For example, with many species and habitats, it is better use of public money to maintain populations where they still exist, rather than try to and improve populations.

List of Questions asked in the consultation paper

Less Favoured Area Support Scheme

Do you agree with the historic payments system proposed for LFASS?

Do you agree with the 'historic payments' system proposed here? If not, what alternative would you suggest?

There is strong evidence that the Less Favoured Area Support Scheme (LFASS) is vital to supporting the land managers of the CNP to help deliver the special qualities of the Park. LFASS is targeted at enterprises that provide breeding cows and sheep and this type of enterprise accounts for the vast majority of farming in the Park, the future shape of LFASS is crucial to the economic, environmental and social development of the CNP.

We accept the need to move to a historic payments basis for the next year or two in the absence of a long term scheme. Proper provision will however have to be made for business changes, such as when land changes hands.

We would however urge SEERAD to begin now to think about a more sustainable scheme. This should look at the options for influencing the thinking of the EU to apply from 2010 and not just restrict ourselves to implementing decision made by others. It should also look at whether other countries can offer useful ideas. The full benefits of the current LFASS scheme need careful understanding and a future LFASS must be designed to at least maintain these, and to support the economic, environmental and social needs of all of Scotland's disadvantaged areas. In the long-term our ambition is for LFASS to become part of the LMC scheme, to ensure better integration of schemes.

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?

We agree that payments should only be made when the land is being actively farmed but that should mean more than just keeping land in an acceptable agricultural condition. Given the importance of LFASS to the economic and social prosperity of the Park's disadvantaged areas, it is crucial that high levels of farming activity continue in return for LFASS. We suggest that a test of continuing activity should be used for LFASS payments to continue. That could be measured in headage or in overall stocking rates. However, we would wish to ensure that this gave farmers and crofters the flexibility to changes their systems, and also deliver greater environmental benefits. We wish to discuss this further with SEERAD.

Do you agree with the proposal to give greater weight to "very fragile areas" and to increase the minimum payment? If so, do you agree with the suggested approach? If not, what alternatives would you suggest?

We suggest that changes be made to the LFASS based on identifying objectives and then delivering them. The change proposed does not do this and appears to be tinkering with the edges. There are 16 parishes designated as 'standard' in the CNP, out of a total of 26 (the other 10 are designated 'fragile'). This change would mean a net loss of support from the CNPA.

We therefore do not agree with either the need for a change or the method proposed. Just because someone farms in an area with greater transport costs does not make them 'less favoured' than some others. Transport costs are not the only measure of disadvantage. Nor are some island communities necessarily more fragile than some communities within the Park. If you compare some islands like Orkney, Skye or some of the Inner Hebrides with parts of the Park, the latter have to cope with more problems with regard to things like climate, fertility of the land and patterns of population decline. As stated above, objectives need to be identified and then the scheme designed. If there is a specific immediate problem with transport then other funds should be considered to solve this problem.

We believe that no changes should be made to the scheme until a full review has been completed. No assumptions should be made at this stage about the direction of a new scheme.

Land Management Contracts

We support the proposal that LMCs become the principal gateway to support for land management, business development, diversification and wider rural development measures.

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

The CNPA developed a draft prioritisation statement for land management in October 2005. We have assessed the national objectives identified in Annex C against this draft prioritisation statement. Annex C appears to include most of the priorities identified in the Cairngorms for land management. We propose adding the following detail to Annex C:

- Under biodiversity, the consideration of species' re-introductions where appropriate
- Under built and cultural heritage, broaden the definition to include traditional music, verse, song, place names and language, and traditional breeds
- Support for moorlands and sporting heritage
- The section under business development should be broadened to include support for tourism facilities and information.
- The encouragement of health and well-being.
- Under access, specific reference should be made to the core path planning
- The section on landscape should make reference to the current policy development on NSAs. The CNPA recently recommended that National Parks should be recognised as providing an additional and complementary approach to the identification and designation of the very best of Scotland's landscapes, so that separate NSAs would no longer be necessary or appropriate within National Parks.

A major concern is that Annex C appears to consider national objectives for the agricultural sector only. It is essential that national objectives are developed for all four Axes – for example, for local communities and businesses too. We would welcome the opportunity to comment on the national objectives for the full RDP.

We also suggest that objectives should be clearly stated for the programme which are not based on 'topics to be delivered', such as biodiversity, but that describe how the programme

should work. The guiding principles in paragraph 19 are a useful start for this. They could be expanded, for example to include integration between applications.

We suggest that the national objectives are used as a starting point for identifying priorities for the Cairngorms (see the proposals for a pilot described below).

Do you agree with the proposed integrations of schemes into LMCs?

We strongly support the policy of integrating schemes into the LMCs. However, this must be done in a way that does not lose the long-term public benefits that have already been delivered by existing schemes. For example, the Forestry Commission has a good reputation for compliance and condition monitoring and expertise should be used in the design of new schemes and processes.

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*

The lists are broadly comprehensive and would appear to deliver the national objectives on the whole. It would be useful to get a better detail of the measures to enable us to comment on their suitability.

We would advocate that measures and prescriptions are based on the outcome that we wish to achieve, rather than the means to get there, as this over-prescriptive approach can result in management on the ground that does not take into account variations in climate or geography. The measures must be based on what is appropriate for the Cairngorms.

An outcome-based approach also helps us to be clear about what the measure is aiming to achieve. For example, current marketing support is available for the wholesale but not the retail sector. This appears arbitrary, but an outcome based approach would clarify the reasons for this.

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

This should be decided by setting priorities at a regional level. For some regions, it may be more appropriate to have more environmental measures than social measures.

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

The measures themselves are broad ranging, but alone they do not encourage an integrated approach. This will come through the regional approach to the advice and guidance available to land managers, and the criteria for approach of the applications. The pilot project described below aims to encourage this.

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

Regional priorities should be set for Tier 2 measures, which the land manager should be encouraged to adopt. These may be spread, or they may be focused, depending on the regional priorities.

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

The capital items appear to be focused towards biodiversity and access objectives. These are welcome, but there is scope for a much wider range of capital items, in particular to meet the agri-business development, tourism and community infrastructure objectives.

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

The CNPA supports the use of the LEADER mechanism to deliver across all the Axes. In our project proposal below, we suggest adopting the LEADER approach of an advisory group and project officer to develop a Cairngorms Regional Committee and advisory mechanism. Please see the detail of the pilot below for more information.

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

We have proposed a pilot below to describe how a LEADER approach could be used to administer LMCs. These would include LEADER + Community Initiative style measures. Please see the detail of the pilot below for more information.

Do you agree with the proposed Rural Development Framework approach?

We strongly support the policy of whole business planning, and the proposed Rural Development Framework approach appears to be a tool for delivering this. We would welcome the opportunity to comment on further detail. There are cost-effective ways of using GIS to providing information to help with planning. There may be a case for planning to involve Tier 2, but this would need to be done in a cost efficient way. We are also very supportive of planning between businesses, to ensure greater delivery of public benefits, for example through landscape scale habitat management.

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

The proposed RPAC approach is not our preferred mechanism for delivering regional and local priorities while meeting national objectives. Please see below for a suggested pilot for the Cairngorms.

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

The proposed RPAC approach is not our preferred mechanism for delivering regional and local priorities while meeting national objectives. Please see below for a suggested pilot for the Cairngorms for delivering all of the Axes.

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

Please see below our proposals for a pilot which would involve a Regional Committee with membership from our Board, land management interests, local communities and businesses, non governmental organisation.

Do you agree with the proposed systems of guidance on regional and local priorities to enable greater targeting in the SRDP?

a) Do you agree with the range of topics that the guidance will cover?

b) Should the guidance adopt the same approach across all three Axes?

Guidance will be crucial for the delivery of quality LMCs. The proposals in the consultation paper are a helpful start to this process: we also propose further advice is put in place, as set out below.

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?

Please see the proposals for the pilot project below.

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

We suggest that the SRDP poses an opportunity to integrate all public sector activities in rural areas. This will have to be phased in with time. This should include structural funds. There is an opportunity for the area based approach to co-ordinate activity from different sources and integrate consultations in the area. There is also an opportunity to review the Good agricultural and Environmental Condition to ensure that it is integrated with tier 2 and provides justification for the public support through the Single Farm Payment. This would have to be done across Scotland to ensure a level playing field.

Do you have a view as to the potential impact of this programme on equality groups such as those relating to gender, ethnicity, disability, sexual orientation, age and faith or belief?

We suggest that the setting up of a Regional Committee (please see below) will mean a greater degree of social inclusion in decision making in our rural areas.

Pilot project for how SRDP regionalisation could be implemented in the Cairngorms National Park 2007-2008

This section presents brief proposals for a pilot for the Cairngorms for 2007-2008 for the implementation of the SRDP. It sets out the strategic role of the CNPA to work closely with a range of partners to ensure that the CNP's priorities are delivered by high quality applications, and that the delivery of outcomes are monitored and used to review the SRDP. It aims to add value to the processes rather than replacing, or worse, duplicating the role of public agencies. The proposal has been discussed with the Scottish Executive and partners.

The Cairngorms Regional Committee

A Cairngorms Regional Committee (CRC) will be set up, chaired by the CNPA. Its membership and function would be formally agreed by the CNPA Board. Its membership will include local communities, land manager representatives, business groups, non-governmental organisations, and public agencies. The CRC's function would be to:

- Agree the priorities for delivery through the SRDP.
- Establish and oversee an effective advisory mechanism.
- Monitor and review the outcomes of the programme.

It is not proposed that the CRC would make decisions on applications. The Scottish Executive would continue to make the decisions on applications and administer the LMCs.

It also proposed that the CRC be linked to the LEADER + Local Action Group, if this scheme continues, to ensure integration. The CRC could also be used to allocate other funds and start to provide a joined up approach to public investment locally. Further information about the functions are described below:

1. Priorities for the CNP

The CRC would agree the priorities for the Cairngorms National Park for LMCs for Tier 3 for all three Axes, and LEADER +. These priorities would be then be used by those assessing the applications. There may also be a case for the CRC to decide priorities for Tier 2 of LMCs, to help target public support, and integrate this with the prioritisation for Tier 3. This would have to be done in a way that meant that participants were not disadvantage in comparison with the rest of Scotland.

The priorities would be based on those identified at a national level. They would also reflect the priorities identified in the National Park Plan. It is anticipated that there would be wide consultation across the CNP to help inform the decision by the CRC.

The CRC would advise on the detail of the measures for delivering the priorities in the Cairngorms. The CRC would also advise the Scottish Executive on whether alternative measures be needed to deliver the priorities. This would need to be done to fit in with the submission to the European Commission and so would happen in 2007 with effect from 2008.

2. Establish and oversee an effective advisory mechanism

Key to the success of a successful scheme is the quality of the advice and support provided in the development of the applications. An effective advisory mechanism would include:

- Clear guidance about the priorities and their implementation
- A recommended list of advisors. There would be clear criteria set for those who wish to be registered, and those advisors who do not meet the criteria would not be listed as recommended.
- Advice on preferred locations within the Park for uptake of particular priorities. The CNPA believes that support for land managers to deliver public benefits is voluntary and that management options would be open to all in the National Park. Nevertheless, there may be some management options that we wish to target to certain locations. For example, positive work for designations, access infrastructure for the core path network or for management for species that require management across several land units.
- Advice on integrating plans between units to increase the public benefit. For example, this could deliver landscape scale habitat management. Integration between units could also deliver footpaths that join up with each other.
- The provision of training courses to provide support to land managers in delivering the priorities.

3. Monitor and review the outcomes of the programme

Having agreed the priorities, then the CRC will monitor progress in the delivery of the outcomes from the programme. For example, if a priority is to maintain the populations of breeding waders in the Cairngorms, then the CRC will monitor the populations of the birds. This is different to 'compliance' monitoring which would be checking that the participant had done all the management required for the scheme, which could include grazing at certain stocking levels and cutting rushes. This compliance monitoring would be undertaken by the Scottish Executive or an equivalent body.

The outcome monitoring would then be used by the CRC to review the implementation of the SRDP. For example, if numbers of breeding waders continued to decline, then review would consider the causes of the decline, and whether the measures needed to be changed. If the wader populations increased, then the information could help the CRC to reach a decision about whether there was a greater priority elsewhere.

Costs

The setting up and servicing of the CRC would involve some costs to the CNPA. Additional costs would arise from the advisory mechanism, and from the monitoring. There are public funds available for these kinds of costs and we have started discussions with the Executive to make best use of these opportunities.

Further options

There are further options for setting up a pilot in the Cairngorms:

1. Make the Cairngorms a region with its own Regional Project Assessment Committees as proposed in the consultation paper.

This option assumes that no CRC exists as it would be extremely bureaucratic to set up two groups. This option is not as attractive as the pilot proposed as it does not include the advisory and monitoring service. It would also mean that the RPAC judges each individual application which would be bureaucratic, time consuming and create problems with conflicts of interest.

If this option was implemented, we would still wish to develop the idea of a dedicated Cairngorms advisory service, as described above.

2. Regional Project Assessment Committees are set up as per the consultation paper, but without the Cairngorms designated as a region.

With this option, it would be difficult to deliver the Park Plan priorities, as we would be trying to influence other areas, which could be split in many different ways. It would also have the same drawbacks as described under option 1 above.

3. Local administration of the SRDP in the Cairngorms.

This option would mean that the SRDP would be administered totally separately in the Cairngorms to the rest of Scotland. A budget would be allocated to the Cairngorms and we would decide how it would be spent and administered. This would mean a huge administrative burden, and is not something that would be easily achieved in the next 2 years.