

THE HIGHLAND COUNCIL

PLANNING, ENVIRONMENT AND DEVELOPMENT COMMITTEE

12 February 2014

SCOTLAND RURAL DEVELOPMENT PROGRAMME (SRDP) 2014 – 2020: STAGE 2 CONSULTATION

Report by Director of Planning and Development

Agenda Item	15
Report No	PED 17/14

Summary

This report introduces the Scottish Government's Stage 2 consultation on Scotland's Rural Development Programme 2014-2020. The paper summarises the consultation and presents a Highland Council draft response (appendix 1). Committee is invited to:

- a) Consider the Government's Stage 2 SRDP consultation, and;
- b) Approve the draft response at appendix 1, subject to any additional comments Members wish to add.

1. Background

- 1.1 The Scotland Rural Development Programme (SRDP) is part funded by the European Agricultural Fund for Rural Development (EAFRD) and Scottish Government. It provides support for a range of economic, environmental and social measures.

This Stage 2 consultation on the SRDP 2014 – 2020 builds on the proposals outlined in the Stage 1 consultation held in summer 2013. A copy of Highland Council's Stage 1 response is available on the Committee information bulletin.

2. Stage 2 Consultation

- 2.1 Stage 2 focuses on the detail of the Scottish Rural Development Programme. The consultation outlines the following key proposals:
- 2.2 Budget : Estimated at £1.326bn. (includes domestic, EU rural development funds and a proposed transfer of 9.5% funds from Direct Payments (DP). The DP transfer forms the basis of a separate consultation to be brought before Committee in May 2014. The budget has suffered a cut in real terms of 5.5%.
- 2.3 Integration with other EU funds. It is proposed that this will apply in the main to the areas of business support, skills/training and social inclusion/local development. Limited information is provided in the consultation on how this will work in practice.

2.4 Priorities for rural development: SWOT analysis undertaken for the new rural development programme has highlighted the following priorities for support: **business viability, protecting the environment, address impact of climate change and supporting rural communities.**

2.5 SRDP Schemes: The following land based and wider rural economy schemes and associated budgets are proposed:

Less Favoured Area Support Scheme (LFASS)	£459m
Forestry Grant Scheme	£252m
Agri-Environment-Climate Scheme	£355m
New Entrants Scheme	£20m
Crofting & Small Farms Support Scheme	£20m
Support for Co-operative Action	£10m
Food and Drink Support	£70m
Small Rural Business Scheme	£20m
Knowledge Transfer and Innovation Fund	£10m
LEADER	£66m
Advice	£20m
Broadband	£9m
Technical Assistance	£15m

2.6 Proposed delivery and application process: A more streamlined delivery process is envisaged. The previous Rural Priorities scheme has been removed and replaced with a targeted range of land based schemes with a single online application process. These schemes will be delivered through a rural regional delivery partnership made up of Scottish Government Rural Payments and Inspectorate Division, Scottish Natural Heritage and Forestry Commission. For land based schemes it is proposed that there is a common application process (excluding LFASS), with targeting of funds and an assessment carried out by a case officer network. There will be two levels of entry:

- Level 1 - applications for grant up to £75,000 with continuous local approval. For forestry the threshold will remain at £750,000.
- Level 2 - applications for grant above £75,000 which will be considered nationally by an expert panel.

Business support outwith agriculture will be delivered through a Small Rural Business Scheme with a standalone scheme for Food and Drink support. Delivery agents have as yet to be identified for these and the proposed Broadband scheme.

The Knowledge Transfer and Innovation Fund (previously Skills Development Scotland (SDS)) will be delivered through a Project Assessment Committee (PAC). The PAC chair and secretariat will be provided by the Scottish Government

The consultation also highlights the proposed expansion of the existing advisory service and the continuation/development of a Scottish Rural network to share good practice.

2.7 Programme timetable: Final proposals will be submitted to the European Commission in spring 2014 with the aim of launching a new SRDP in January 2015.

2.8 Transitional Regulation: Due to the late start of the new SRDP, transitional arrangements will be put in place to cover the period 2014/15. During this time key elements of the SRDP will continue e.g. LFASS, agri -environment and organic contracts due to finish in early 2014 will be extended alongside woodland creation and management contracts.

2.9 Members wishing further details of the Stage 2 consultation can find the full consultation at <http://www.scotland.gov.uk/Publications/2013/12/7550/291098>
The consultation closes on the 28th of February 2014.

3. The Draft Highland Council Response

3.1 The Highland Council draft response has been prepared in consultation with officers in the Planning and Development Service. The draft response is attached at Appendix 1 and the key points in the response are listed below:

- The Council is disappointed with the overall reduction in SRDP funds, which means that Scotland retains the lowest spend per hectare of rural development funds in Europe. The Council is also disappointed with the proposed allocation of funds to off-farm/wider rural development relative to the funds allocated to the farming and forestry sectors.
- The Council is broadly supportive of the proposed new simplified application and assessment process for land based investment.
- 35% of the SRDP budget is allocated to LFASS. The Council has long argued that the current LFASS funding is ineffective and strongly supports the need for the implementation of a new area designation: Area Natural Constraints (ANC). These amendments should be made as soon as possible and the Council will continue to influence discussions around targeting payments in these areas.
- The Council notes and welcomes the greater emphasis on forestry, climate, new entrants, food and drink and broadband in the new SRDP.
- The Council supports the expansion of the Crofting Scheme to provide support to small farms but this expansion should be restricted to small farms and registered crofts in HIE's fragile areas.

- The Council supports the on-going management of agri-environment measures already invested in under previous schemes, and welcomes the measures for crofting. However the Council is of the opinion that, overall, the measures suggested are unlikely to halt wider biodiversity loss on agricultural land unless all farms bring their land up to a minimum ecological standard which goes beyond current GAEC criteria. The Council would like to see those activities that provide a positive role in sustaining and developing rural communities given the highest priority for funding. The Council also notes that built heritage is poorly catered for in the proposed Programme and would wish this aspect of the proposals reviewed and improved.
- The Council seeks further clarity on the proposed delivery agents and budget allocations for wider rural economy schemes as this is not apparent in the consultation.
- The Council seeks further detail in respect of the integration and delivery of funds across the SRDP and between other EU funds particularly those relating to wider economy. Integration must avoid duplication and ensure maximum impact from the funds available. The draft response suggests that the proposed thematic working groups should be the work groups being set up under the 13 Strategic Interventions proposed under the European Structural Investment Fund, to enable integration between the various rural development funds available. The Council has recently responded to a consultation on the European Structural Investment Programmes 2014-20 (see <http://www.highland.gov.uk/NR/rdonlyres/D85F11C5-02BE-4575-86AA-8C6BAE31599A/0/Item17FHR1414.pdf>).
- The Council is very disappointed that the **minimum** allocation of 5% has again been directed at LEADER, as wider rural development is a key priority for the Highlands. The Council seeks an increase in the allocation for LEADER and seeks further clarity on the delivery and integration of LEADER funds with other EU funds.
- The Council strongly suggests that there is a need for further integration around the proposed communication strategy, advisory service and new Scottish Rural network, to avoid duplication of effort and loss of synergy.

4. Fit with the Programme for the Highland Council

Contributing to the SRDP Stage 2 consultation assists the Council deliver Programme commitments linked to the economy, climate change and the environment.

5. Fit with the Single Outcome Agreement (SOA)

Contributing to the SRDP Stage 2 consultation assists the Council deliver SOA outcomes linked to the economy and the environment.

6. Resource Implications

There are no potential resource implications arising from the contents of this report. However, the SRDP Stage 1 consultation included an expectation that potential lead partners in the delivery of the future SRDP would pre-identify match funding to part fund project delivery. As stated in the previous Council Stage 1 response, where the future programme and Highland Council priorities align there is the opportunity for the Council to maximise the benefits of SRDP funding in the Highlands

7. Risk Implications

There are no risk implications arising from this paper. However the delivery of future SRDP funding is to be allocated in the main to non-local authority and national agencies. The Council will wish to ensure that it plays an important role in the final delivery of funds and that it can influence local priorities.

8. Legal and Carbon Clever Implications

There are no legal or climate change implications arising from this report. However, Members will wish to note that support for low carbon activities is included and strengthened in the SRDP fund proposals.

9. Equalities Implications

There are no equalities implications arising from this report. A full equalities assessment has been undertaken as part of the Phase 2 consultation.

Recommendation

Committee is invited to:

- a) consider the Government's Stage 2 SRDP consultation; and
- b) approve the draft response at Appendix 1, subject to any additional comments Members wish to add.

Designation: Director of Planning and Development

Date: 23rd January 2014

Author: N Wallace (Ext 2568)

Background Papers:

1. Consultation on Scottish Rural Development Programme(SRDP) 2014 – 2020
2. Highland Council SRDP Stage 1 consultation response

APPENDIX 1

Highland Council Draft Reponse to Consultation on Scottish Rural development Programme (SRDP) 2014-2020 Stage 2: Final Proposals

Q1. How would you rate your satisfaction with the budget as a whole?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Highland Council is disappointed at the reduced funding of the SRDP and particularly that Scotland continues to have the lowest SRDP payment per hectare in Europe. In terms of the budget allocation to the different elements of the SRDP, Highland Council notes that LFASS is to receive 35% of the total budget, yet the scheme still favours the most productively farmed areas. The new ANC to be developed in 2015 needs to demonstrate better public benefits.

The SRDP needs to clarify how rural development will align with and be integrated with the activities proposed for the ERDF and ESF. Integration is a key element in delivering synergy and maximising the development benefits that could flow from the ESIF in Scotland. Integration appears to be missing in the Programme development process to date.

The Council is disappointed that the support for off-farm and wider rural development, including the LEADER Programme is to receive very low allocation of funding relative to funds targeting farming and forestry businesses.

The Council is also dissatisfied with the budget allocated to peatland restoration as it is not proportionate to its value as a carbon store and sink.

Q2. Are you broadly satisfied with the new application and assessment process for land based investments outlined in Section 5?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Some elements of the process remain unclear but in general the emphasis on streamlining and simplification are to be welcomed. Highland Council welcomes the support to be given to applicants – paragraphs 121 and 122.

We would seek to clarify that if an application is turned down or requires amendment during the assessment process, this should still amount to 1 application and still be eligible for consideration in any given year.

Highland Council would like to see further clarification on how the application of discretionary rates by case officers will be standardised across Scotland. The Council would also like any guidance for managers and case officers on how intervention rates are to be applied to be made publicly available.

Q3. Should support for farmers operating in constrained areas be continued through the SRDP?

Yes

No

Other, please specify below

Whilst Highland Council supports the continuation of support to farmers and crofters in constrained areas, it recognises that the current scheme does not adequately support those operating in the most constrained areas, and in fact payments tend to be higher to those operating in the least constrained areas. It is essential that conversion of LFAS to ANC takes place at the earliest opportunity to enable the scheme to be better targeted at those who truly operate under less favourable conditions and to offer better value for money. The scheme needs to deliver better public benefits, particularly as it proposed that 35% of the SRDP budget is allocated to LFAS. We look forward to further consultation on a revised scheme in 2015.

Q4. How would you rate your satisfaction with the proposals for the New Entrants Scheme?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons

The Council supports the provision for an application “in principle” to provide applicants with the security to take on a new holding.

The Council would not like to see the majority of funding going to support intergenerational exchange; and suggests the option for a lower intervention rate in these scenarios.

Q5. Should the scheme be expanded to provide capital support to small farms?

Yes
No
No opinion

Q6. Is a 3 to 50 hectare range appropriate for defining a small land holding?

Yes
No
No opinion

A registered croft should be eligible even if it is less than 3ha, as many are.

Q7. Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees?

Yes
No
No opinion

If No, please explain why

Highland Council strongly supports this proposal and suggests that all Grazing Committees should receive grants as they all have considerable extra responsibilities and functions as dictated by the 2010 Act.

Q8. How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

The scheme should be restricted to small farms and all registered crofts in HIE's fragile areas.

Q9. How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

The Council is of the opinion that overall the measures suggested are not going to halt the wider biodiversity loss on agricultural land in Scotland. However, there is the opportunity to deliver specific outcomes through appropriate geographical targetting of measures. Further involvement of stakeholders is required to ensure that targetted zones are suitable for the diverse habitats through Highland.

The Council would like to see those activities that provide a positive role in sustaining and developing rural communities given the highest priority for funding. In this way the SRDP can be promoted as having a more positive impact on rural development.

The options at Annex C are somewhat confused and seemingly driven by 4 species of birds all of which have a limited range. While the status of the Chough, Corncrake, Corn Bunting and Hen Harrier are of concern they should not have 7 of the 10 grassland options dedicated to them. The issues for Hen Harrier are beyond the SRDP, as they are not related to habitat quality. What about the Grey Partridge and Brown Hare both of which have declined greatly in the last 40 years?

The SRDP needs to accept that unless ALL farms bring their land up to a minimum ecological standard, which must be beyond the current GAEC criteria, biodiversity will continue to decline. It is unclear whether the Ecological Focus Areas (EFAs) required under pillar 1 for arable farms will be eligible for the Agri Environment Climate Change Scheme. The Council is of the opinion that these areas should not be a priority under the SRDP.

Furthermore it is unclear how this might work if some of the EFA was also a high priority SRDP target in a particular area. However, if there is going to be expert advice available and there is localisation of options, it would be possible to zone priority areas that farmers must include as part of EFAs.

The scheme could be simplified further by concentrating on 6 key agricultural habitat actions:

- Riparian areas
- Detention ponds
- Boundary features
- Bog restoration
- Upland areas
- High nature value farming.

The Council is dissatisfied with the level of detail regarding the inclusion of the historic environment within this scheme. Most notably the document refers only to Scheduled Monuments and there is no reference to the protection and management of undesignated heritage assets (which make up over 90% of the historic environment). Whilst we expect that the UKFS and FCS Scotland's Woodlands and the Historic Environment 2008 will cover the protection of historic environment assets within forestry schemes, there is no mention of the scope and approach to be taken to protect the historic environment from harmful agricultural practices and to avoid potential conflicts with other options within SRDP. The enhancement of historic environment assets and landscapes (such as the repair of

stone dykes or the provision of access) is also notably absent. We would like to see further details as to how historic environment advice will be obtained within the new programme going forward.

Q10. It is proposed to support forestry under six main areas as outlined below. Please identify whether you agree with these broad areas.

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

Q11. We propose nine woodland creation options with support through standard costs. Please identify whether you think these options should be included (Yes) or excluded (No)

Conifer	Yes, should be included	No, should NOT be included	No opinion
Diverse Conifer	Yes, should be included	No, should NOT be included	No opinion
Broadleaves	Yes, should be included	No, should NOT be included	No opinion
Native Scots Pine	Yes, should be included	No, should NOT be included	No opinion
Native Broadleaved W4	Yes, should be included	No, should NOT be included	No opinion
Native Broadleaved Other	Yes, should be included	No, should NOT be included	No opinion
Native low density	Yes, should be included	No, should NOT be included	No opinion
Small or Farm Wood	Yes, should be included	No, should NOT be included	No opinion
Northern and Western Isles	Yes, should be included	No, should NOT be included	No opinion

Q12. Are there any other woodland types that should be supported? If Yes, please specify

Yes
No

Q13. Should the Central Scotland Green Network be allowed an 'Additional Cost Contribution'? If No, please briefly explain your reasons

Yes
No

Whilst Highland Council recognises the higher costs in creating woods in the CSGN area, it does not agree that this should only be applied to those operating within the M8 corridor.

Consideration should be given to schemes within other parts of the country (urban areas and fragile communities) that can demonstrate higher establishment costs (and not under WIAT). Such schemes should be eligible for an 'Additional Cost Contribution' if delivering a wider public benefit.

Q14. What is your preferred option for Income Foregone (IF) 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.

Please explain your choice

Option 2 would be the simplest to administer and could actively encourage farmers and crofters to plant trees as they would be able to continue to claim DP.

Q15. It is proposed to support woodland creation through other means. Do you agree with the range of 'other support' for woodland creation?

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

Q16. Should agroforestry be funded through the SRDP 2014-2020?

Yes
 No
 No opinion

Provided that DP can still be claimed. It would also provide options for older woodlands carried out under the FWPS.

Q17. Should tree health be funded through SRDP 2014-2020?

Yes
 No
 No opinion

Q18. Do you agree with the range of Woodland Improvement Grants?

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

Q19. 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?

Small scale premium processing sector	Yes, should be included	No, should NOT be included	No opinion
Equipment to increase harvesting in under-managed woods	Yes, should be included	No, should NOT be included	No opinion
Equipment to increase capacity for steep ground harvesting	Yes, should be included	No, should NOT be included	No opinion

Q20. We propose six Sustainable Management of Forest Options. Do you agree with the range of Sustainable Management of Forest grants?

Native Woodlands	Yes, should be included	No, should NOT be included	No opinion
Low Impact Silvicultural Systems (LISS)	Yes, should be included	No, should NOT be included	No opinion
Public Access	Yes, should be included	No, should NOT be included	No opinion
Public Access WIAT ((woods within 1 km of settlements with a population of over 2000 people)	Yes, should be included	No, should NOT be included	No opinion
Livestock Removal	Yes, should be included	No, should NOT be included	No opinion

Woodland Grazing

Yes, should be included No, should NOT be included No opinion

Q21. How would you rate your broad satisfaction with the proposals for the Forestry Scheme

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Highland Council has some concern over the overall level of funding to meet stated woodland creation targets and over a balance of woodland types.

Some of the eligibility criteria for WIAT schemes exclude a number of Highland communities. Flexibility in population size and distance would potentially allow a greater uptake of such initiatives within Highland.

Advance payments should be considered for projects that provide justification.

Q22. How would you rate your broad satisfaction with the proposals for co-operation?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

This provision could result in some excellent projects. It is unclear from the proposal whether co-operation/collaboration has to be agreed before the Project is eligible. It may, in some projects, be necessary to appoint a Project Officer to negotiate the collaboration. The Council therefore suggests that a pre-development fund should be established to enable Project Officers to investigate the feasibility and support for collaboration.

Q23. How would you rate your broad satisfaction with the proposals for Small Rural Business Support?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Advice on business start-up and development should be integrated with the activities proposed under the current Strategic Intervention (SI) - Business Competitiveness. Business Gateway(which in practice is the relevant local authority) has been identified as a delivery vehicle for Business Competitiveness under the ESIF and should also be the delivery vehicle for Small Rural Business Support under the SRDP.

The Council would support a provision to make advanced payments where appropriate justification and risk assessment is provided.

Q24. Should the Scottish Government continue to give significant support to the food and drink sector?

Yes

No

Q25. Should selection criteria such as those listed below apply to the Food and Drink Scheme?

Contribution to the Scottish Government's overall strategies for economic development and the rural economy Yes No No opinion

Making a contribution to national policies for food and drink Yes No No opinion

Assisting the Scottish Government with its wider social policies Yes No No opinion

Supporting export targets for food and drink sectors Yes No No opinion

Q26. Should steps be taken to streamline processes for food companies including a one stop shop for public support?

Yes

No

No opinion

Q27. How would you rate your broad satisfaction with the proposals for Food and Drink support?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Support for food and drink businesses should also be considered in light of current business support arrangements in place and the support mechanisms proposed under the current strategic interventions – Business Competitiveness to be funded via the ERDF. Therefore a

one-stop shop may not be the most appropriate approach as for example businesses may already have established and positive support arrangements in place via Business Gateway or through their account management arrangements with HIE and a one-stop shop may actually complicate rather than streamline support.

Highland Council had a representative on the nPAC for the previous scheme and experience shows that big businesses are better users of the scheme than smaller businesses. Whoever takes on the administration of the scheme must be tasked with improving access and facilitation to smaller businesses. There is an emphasis on providing advice and support to other elements of the SRDP, and this should be the same for this element of the programme too.

Support to the food and drink sector can promote rural development and community sustainability and can also have positive impacts on energy use and carbon footprints. These aspects should be considered when scoring projects. There should also be the scope to change the ranking of scoring criteria according to geographical location. For example, meeting wider social policies may be more important to locations with under-employment or a declining population, than supporting export targets for food and drink.

Q28. How would you rate your broad satisfaction with the proposals for LEADER?

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

The development of LEADER strategies should be aligned with wider rural development strategies to avoid duplication and deliver development synergies. For this to be realised there is a need for an alignment of timelines with the ESIF SI's.

In light of the lack of focus on rural development on the part of the ERDF, the Council is concerned that rural development will lack the funds to deliver meaningful outcomes. To address this, the funding for LEADER should be considerably greater than the minimum 5% proposed. Sight ought not be lost that LEADER will, for the first time cover all of rural Scotland.

There is little information provided on how the LEADER programme is to operate.

LEADER should be better integrated with other elements of the SRDP, particularly the KTIF scheme and proposals for co-operation. LEADER should also be well connected to the SRN and advisory services.

Q29. Do you agree with the range of options listed below which are being included within the KTIF scheme?

Skills development	Yes	No	No opinion
Vocational training	Yes	No	No opinion
Monitor farms	Yes	No	No opinion
Setting up an EIP network	Yes	No	No opinion

Q30. How would you rate your broad satisfaction with the proposals for KTIF?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Highland Council supports the continuation of Monitor Farms but is of the opinion that this should continue to be funded from existing industry sources. There are overlaps with this measure and the SRN, advisory services and communications plan. These should all be better integrated to ensure better sharing of knowledge. Setting up an EIP network should form part of the SRN.

Q31. How would you rate your broad satisfaction with the proposals for the Advisory Service?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Highland Council welcomes the proposals for a new coordinated and better integrated advisory service. This proposal has the potential to deliver far better farm-based schemes over the whole of Scotland and maintain consistency in the quality of advice. Although some aspects remain unclear, it essential that quality specialist advice on the environmental, biodiversity and heritage aspects of the SRDP are as adequately covered as the agricultural and business elements.

The Council would welcome an emphasis on pro-active advice, including advice on targeted elements in specific locations and on-going feedback on parts of the SRDP that are being underspent.

It is essential that the advisory service is operational from the beginning of the scheme.

Some promotional/explanatory meetings should be held. One of the criticisms of the last SRDP was that there was not enough uptake in remoter areas. The advisory services should be equally available and accessible across the whole of Scotland, otherwise it will continue to disenfranchise remote rural populations.

Q32. 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?

SRN website	Yes, should be included	No, should NOT be included	No opinion
Gathering of good programme examples	Yes, should be included	No, should NOT be included	No opinion
Disseminating information to the public	Yes, should be included	No, should NOT be included	No opinion
Organisation of events	Yes, should be included	No, should NOT be included	No opinion

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

There SRN is not effective where it sits in the current SRDP; it is too isolated. More thought needs to be given to it working more closely with the scheme rather than being an entity in itself. Highland Council is of the opinion that the SRN would achieve far more if it was encompassed in the advisory services hub along with the KTIF. This would enable better engagement in project activities and increase involvement of stakeholders.

Q33. Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities?

Yes

No

No opinion

If No, please explain your reasons

The supporting information given in the consultation document does not convince Highland Council that these thematic groups will achieve anything.

The Council strongly suggests that these proposed thematic working groups should be one and the same as the working groups being set up under each of the 13 Strategic Interventions proposed under the European Structural Investment Fund. This would enable better integration between the various rural development funds available. The Council has recently responded to a consultation on the European Structural Investment Programmes 2014-20 (see <http://www.highland.gov.uk/NR/rdonlyres/D85F11C5-02BE-4575-86AA-8C6BAE31599A/0/Item17FHR1414.pdf>).

Q34. How would you rate your broad satisfaction with the proposals for the Scottish Rural Network?

- Very satisfied
- Quite satisfied
- Neither satisfied nor dissatisfied
- Quite dissatisfied
- Very dissatisfied**

If you are dissatisfied, please briefly outline your reasons.

The Council is not dissatisfied with the benefits that the SRN hopes to achieve but it is concerned that the proposals in the consultation document will not deliver these. The proposals are too complicated and bureaucratic. It is top heavy and the beneficiaries are unclear. The SRN needs to be closer to the delivery of the SRDP which is why the Council suggests that it is encompassed in the advisory services hub.

Q35. How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?

- Very satisfied
- Quite satisfied
- Neither satisfied nor dissatisfied
- Quite dissatisfied
- Very dissatisfied**

If you are dissatisfied, please briefly outline your reasons.

Highland Council is of the opinion that communicating the SRDP should rest with the advisory services/SRN hub, and not be a separate entity.

Q36. Information used to monitor and evaluate the SRDP will be gathered from a mixture of data sources. We would welcome feedback on the approach outlined.

Q37. Are there any other data sources which could inform the impact of the programme?

Yes

No

If Yes, please specify

Highland Council provides key information, profiles and analysis for its region. This includes data on unemployment, benefit claims, and housing as well as key facts and figures on population, occupations, economic activity, employment and earnings. At a sub-regional level the Council provides key statistics for all of its wards. All of this information is publicly available at <http://www.highland.gov.uk/yourcouncil/highlandfactsandfigures/>

Q38. The Scottish Government has identified a number of gaps in the indicator requirements and has set out plans for addressing these gaps, outlined in 'More information' 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.

Q39. Are there any other gaps that you wish to make us aware of?

Yes

No

If yes, please specify

Before and after habitat maps should be part of monitoring and evaluation of the Agri Environment Climate Scheme. These would map where habitat creation/ management would take place and could be used at the end of the scheme to check if what was agreed was delivered. The farmland advisors could create these maps. An additional benefit is that a digitised map would lend itself to accurately quantifying what biodiversity habitat gains had been made - something which has never been done and would allow further scrutiny of the SRDP.

Q40. Are there any other data sources which could help us fill the data gaps?

Yes

No

If Yes, please specify.

Records from BTO, BBS, WeBS and Bird Atlas work. Other biological records of particular species groups are available on the National Biodiversity Network.

The Council would like the monitoring and evaluation requirements of the SRDP to be relevant and targeted to specific schemes. It should be kept simple and relevant, so that fewer indicators rather than more, can be used effectively.

Q41. We would welcome comments on the Business and Regulatory Impact Assessment (BRIA)

Q42. We would welcome comments on the Equalities Impact Assessment (EQIA)

If you have any further comments, please write them in the box below

In general the Highland Council is disappointed with the funding that is proposed for rural development. The Council would urge a review of the funding proposals to better reflect the need to develop Scotland's rural areas and maintain sustainable and prosperous communities. A greater focus is required to fund activities in the ANC, forestry and agri-environment budget lines that support the utilisation of the natural environment for the benefit of the public via environmental goods and for communities via community led maintenance of environmental assets.

In support of communities and business alike in rural areas the Council would wish to see an increase in the funding for the roll out of Next Generation Broadband (NGB) across the Highlands.