



Richard Lochhead MSP  
The Scottish Parliament  
Edinburgh  
EH99 1SP

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Dear Mr. Lochhead,

### **Scottish Rural Development Programme Review**

I am writing on behalf of the Biodiversity and Agriculture Task Forces of Scottish Environment LINK in advance of the SRDP review to express some concerns. LINK has been involved from the beginning in stakeholder discussions on Rural Development Contracts. Our member bodies are involved in every aspect of the scheme; putting applications together; advising applicants; designing options and sitting on the policy forums. We are very supportive of the ideas behind Rural Priorities and the options included in the scheme. We have been extremely concerned by suggestions to divert funding from Rural Priorities to other parts of the SRDP. LINK is strongly committed to supporting the 2010 target to halt the loss of biodiversity and together with our member organisations, we are striving to help meet it<sup>1</sup>. RPs are the only SRDP mechanism that can contribute in a meaningful way to this process. While Land Managers Options may provide limited environmental goods, they are not sufficiently targeted to have proven benefits for threatened habitats and species. Funding for targeted agri-environment work is already insufficient and to reduce it further would be a disaster for Scottish biodiversity.

Although LINK believes RPs have the potential to be extremely useful in reducing biodiversity loss, there have been some initial teething problems with the scheme that must be ironed out if it is to function effectively. In particular, LINK is worried that "normal", wider landscape agri-environment, as funded through the Rural Stewardship Scheme may have a reduced chance of being funded under the new scheme. LINK has five suggestions listed below to improve RPs.

1. Introduce UK BAP species as a fifth national priority. This would have the effect of boosting the scoring potential of applicants who are entering fairly simple options known to work for particular species.
2. Reduce the focus that is currently being placed on collaborative applications. In many circumstances, a collaborative application can deliver more than individual ones and LINK has supported encouragement of collaboration through RPs. However, applicants to agri-environment measures are currently

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<sup>1</sup> For more detail see the Biodiversity Task Force publication *Delivering the Goods*, available at [www.scotlink.org](http://www.scotlink.org)

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being told that they will not be successful unless they are on a protected site or can collaborate with their neighbours. Collaboration is not an aim of the programme in itself. While collaboration should be scored more highly where it genuinely results in additional benefits, it should not be prioritised to the detriment of individual applications, where they would deliver more successfully.

3. Amend the application process so that simple applications can be fast-tracked. At the moment it may be just as costly in terms of money and time for a crofter to enter a couple of hectares into corncrake management as it is for a complicated, large-scale, collaborative application. Where it is known that certain measures in certain areas will deliver particular outcomes, it should be possible to reduce the administrative work required prior to submitting an application.
4. A technical working group should be convened urgently to deal with problems with individual options and suggest new options where necessary.
5. While most case officers are helping applicants to the best of their ability and are a good first port of call for most queries, there remain some issues concerning their remit. Case officers are giving different guidance in different areas. Some case officers also believe that they should not be giving advice on the options, just guidance through the application process. This can mean that unless applicants have detailed knowledge of species and habitat management requirements, they are unable to identify appropriate priorities to suit their application. Case officers should be able to work together with the applicants to put forward the best possible application, based on the best possible advice. Advice should be consistent across the RPAC areas while leaving scope for reasonable local variations to the options. LINK would like to offer the Government our expertise in assisting with workshops on environmental options and ensuring that applicants have access to the best possible information.

We hope the above suggestions are helpful. We look forward to working closely with you on the SRDP review.

Yours sincerely,

**Deborah Long, Biodiversity Task Force Convenor**  
**Katrina Marsden, Agriculture Task Force Convenor**

The Biodiversity and Agricultural Task Forces consist of the following members:

Archaeology Scotland	Ramblers Scotland
Buglife – The Invertebrate Conservation Trust	RSPB Scotland
Bumblebee Conservation Trust	Scottish Gardens & Allotments Society
Butterfly Conservation Scotland	Scottish Native Woods
John Muir Trust	Scottish Wildlife Trust
Mountaineering Council for Scotland	Woodland Trust Scotland
National Trust for Scotland	WWF Scotland
Plantlife	

cc. Michael Russell, Richard Wakefield, Peter Russell, David Barnes, Jo O'Hara, Paul Neison, Yvonne Summers

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