

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

Institute for Archaeologists (IfA)

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Howard

Forename

Tim

2. Postal Address

Institute for Archaeologists

Miller Building

University of Reading

Reading

Postcode RG6 6AB

Phone 0118 348 6446

Email

tim.howard@archaeologists.net

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

INDIVIDUAL WITH PRIMARY INTEREST IN:	
Farming	<input type="checkbox"/>
Forestry	<input type="checkbox"/>
Fishing	<input type="checkbox"/>
Deer or game management	<input type="checkbox"/>
General land management (or interest in a combination of land uses)	<input type="checkbox"/>
Other rural community issues	<input type="checkbox"/>
Other - Please State:	<input type="checkbox"/>
ORGANISATION WITH PRIMARY INTEREST IN:	
Public Bodies (National)	<input type="checkbox"/>
Local Authorities and other local public bodies	<input type="checkbox"/>
Environmental and Nature conservation organisations, charities	<input type="checkbox"/>

and representative bodies	
Deer or game management organisations, charities and representative bodies	<input type="checkbox"/>
Farming organisations, charities and representative bodies	<input type="checkbox"/>
Forestry organisations, charities and representative bodies	<input type="checkbox"/>
Fishing organisations, charities and representative bodies	<input type="checkbox"/>
General land management organisation, charities or representative bodies	<input type="checkbox"/>
Local community organisation, charities or representative bodies	<input type="checkbox"/>
Other - Please State: professional body	X

4. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

(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?

Please tick as appropriate

Yes No

Yes, make my response and name available, but not my address

(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?

Please tick as appropriate

Yes

SCOTLAND RURAL DEVELOPMENT PROGRAMME (SRDP) 2014-2020: CONSULTATION QUESTIONS:

We are inviting written responses to this consultation paper and respondents can reply to all of the questions, or a selection, depending on where their interests lie. Everything you tell us will help us design a better SRDP. The consultation takes place over an eight week period and closes on **Sunday 30 June 2013**.

Please send your response with the completed Respondent Information Form to either:

SRDP2014-2020Consultation@scotland.gsi.gov.uk

or

SRDP 2014-2020 Consultation
D Spur
Saughton House
Edinburgh
EH11 3XD

SECTION 2 : SETTING THE 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 (paragraph 27)?

Agree Disagree

Please explain your views.

IfA supports the integrated approach under the new Common Strategic Framework and the marshalling of EU funds into 3 'Scottish Funds'. Such funds have an important role to play in the study and care of the historic environment, particularly given the fact that the vast majority of the historic environment (approximately 95%) lacks any statutory heritage designation.

The Institute wishes to see support for the management of landscapes and other historic assets more clearly and centrally integrated into the framework for funding, given the enormous environmental, economic and social benefits that such assets provide. Realising those benefits will do much to achieve Scottish Government and EU priorities across the 3 funds identified at paragraph 27, for instance, with regard to 'local development and social inclusion'. The reference to 'environment' in 'low carbon, resource efficiency and environment' should unambiguously embrace the historic environment.

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 (paragraph 29)?

Agree Disagree

Please explain your views.

Such Committee should reflect the views of relevant stakeholders (including local communities) and be open to scrutiny.

SECTION 3: OUR INVESTMENT PRIORITIES FOR RURAL DEVELOPMENT

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?

Agree Disagree

Please explain your views.

IfA would seek to prioritise those articles which deliver environmental, landscape and community benefits.

In this regard, we would highlight the importance of two Articles

(1) Article 29 'Agri-environment & climate change'

The future programme should make express provision for measures to manage, protect and improve historic assets on farmland under an agri-environment landscape option.

(2) Article 16 'Advisory Services'

The availability of appropriate expertise is crucial to the management and protection of the historic environment. Elsewhere in the United Kingdom historic environment advisors are employed to support the implementation of agri-environment / stewardship schemes. The provision of such expertise as part of a farming advisory service would be welcome.

IfA would also urge Scottish Government to ensure that advice is provided by appropriately accredited practitioners (IfA validates its professional members and registers archaeological organisations under its Registered Organisations Scheme: see <http://www.archaeologists.net/regulation/organisations>).

SECTION 5: STRATEGIC TARGETING OF INVESTMENTS

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?

Agree Disagree

Please explain your views.

Nonetheless, there needs to be further work more effectively to map the historic environment (see, for instance, *Defining Scotland's Places (DSP)*) and flexibility to address sites and issues which may emerge in the course of the programme.

SECTION 7: DELIVERING THE SRDP: PROGRAMME STRUCTURE

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

Agree Disagree

Please explain your views.

This should not compromise the ability through LEADER to support the historic environment.

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 Disagree

Please explain your views.

Provided that the new assessment process has access to historic environment expertise and adequately addresses issues relating to the historic environment.

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 Disagree

Please explain your views.

IfA accepts Scottish Government's reasoning given likely spending restrictions.

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?

Agree Disagree

Please explain your views.

No comment.

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?

Agree Disagree

Please explain your views.

No comment.

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 Disagree

Please explain your views

Provided that support for crofters remains subject to cross-compliance requirements.

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 Disagree

Please explain your views.

No comment.

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 Disagree

Please explain your views.

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

Agree Disagree

Please explain your views.

Provided that this increases, rather than restricts, the range of support available (which was not wholly clear from paragraph 85).

Question 14: Do you agree or disagree with the measures proposed by the New Entrant Panel (paragraph 92) to encourage new entrants to farming?

Agree Disagree

Please explain your views.

No comment.

SECTION 8: APPLICATION AND ASSESSMENT PROCESS FOR AGRICULTURE, ENVIRONMENT, LANDSCAPE AND FORESTRY

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

Agree Disagree

Please explain your views.

Provided that case officers have, or have access to, appropriate expertise in relation to the historic environment.

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

Agree Disagree

Please explain your views.

IfA is concerned to see that, whatever the process, historic environment considerations are adequately addressed. Given the high proportion of the historic environment which is undesignated (approximately 95%), this should involve local authority archaeology and historic environment services which play a key role in the management and protection of the historic environment.

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

Agree Disagree

Please explain your views.

Not with regard to the historic environment where public benefit is the predominant theme.

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

Agree Disagree

Please explain your views.

The proposals in paragraph 105 seem sensible.

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

Please explain your views.

Effective advisory services including access to appropriate expertise in relation to the historic environment.

SECTION 9: INTEGRATED INVESTMENTS

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 Disagree

Please explain your views.

This should cover the historic environment as well as the natural environment.

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?

Agree Disagree

Please explain your views.

This should be permissive rather than mandatory.

SECTION 10

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

Agree Disagree

Please explain your views.

This would be particularly helpful where measures are directed at a landscape scale.

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?

Agree Disagree

Please explain your views.

This could facilitate the management and protection of the historic environment.

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

Agree Disagree

Please explain your views.

This could facilitate the management and protection of the historic environment.

SECTION 11: ADVISORY SERVICE

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?

Agree Disagree

Please explain your views.

Environment should be clearly acknowledged to encompass both the natural and the historic environment.

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

Agree Disagree

Please explain your views.

See above comments upon the importance of advisory services including access to appropriate expertise in relation to the historic environment.

SECTION 12: FINANCIAL INSTRUMENTS

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

Please explain your views.

We would support the provision of loans in relation to the historic environment where public benefit will be delivered.

SECTION 13: VOLUNTARY MODULATION

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?

Agree Disagree

Please explain your views.

Further funding for SRDP will facilitate the delivery of public benefit in relation to the historic environment.

SECTION 14: EQUALITIES IMPACT ASSESSMENT (EQIA)

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.

IfA is not aware of any potential impacts.