

ANNEX A: RESPONSE FORM

Getting the best from our land: A draft land use strategy for Scotland

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

Scottish Crofting Federation

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Murdie

Forename

Donald

2. Postal Address

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Kyle

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Email donald@crofting.org

3. 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 <input type="checkbox"/> Yes <input type="checkbox"/> No	(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 <input type="checkbox"/> Yes <input type="checkbox"/> 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 <input type="checkbox"/>		
	or		
	Yes, make my response available, but not my name and address <input type="checkbox"/>		
	or		
	Yes, make my response and name available, but not my address <input type="checkbox"/>		
(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 <input type="checkbox"/> Yes <input type="checkbox"/> No		

CONSULTATION QUESTIONS

PLEASE NOTE: Questions 1 to 10 relate to the Draft Land Use Strategy; questions 11 to 14 relate to the accompanying Environmental Report.

INTRODUCTION (Section 1 of the draft Strategy)

Vision – A prosperous and sustainable low-carbon economy, underpinned by successful land-based businesses, flourishing natural environments and vibrant communities.

Question 1a: Do you have any comments on the vision that we have proposed?
There is not much new about the vision, but it is one that we would all wish to aspire to. If it is accompanied by innovative policies and new thinking it has some chance of becoming reality. Such a new approach has been exemplified by the Scottish Food and Drink Strategy, which represented genuinely fresh thinking on the role of Scotland's land-based industries in the nation's food security and economic growth. If such a new approach were taken to such rural policy issues as affordable housing, transport, energy, land ownership and economic regeneration of rural centres, the vision may be achievable.

Question 1b: Taken together, do the objectives and their accompanying strategic directions support the vision?
Again, there is nothing new here, and nothing that anyone can argue with. The question is whether a policy framework for delivery can be built within current economic circumstances.

PRINCIPLES FOR SUSTAINABLE LAND USE (as set out in text of section 1)

Question 2a: Is it useful to set out principles for sustainable land use?
Yes, provided those principles result in a joined-up approach across government, both local and national, reflected in policies on planning, housing, agriculture, food, transport, environment, forestry, land ownership, recreation and tourism. Such a joined-up approach is sadly lacking at present.

Question 2b: Do you think that these are the correct principles? If not, how would you like to see them changed?

"A coherent and predictable policy framework" (Principles 1.1.a) is something that all land-based businesses would crave. The uncertainty created by the post-2014 support regime is a great anxiety for such businesses, especially those in the north and west who feel overlooked and undervalued by emerging proposals. In the crofting sector, the support schemes unique to crofting - Crofting Counties Agricultural Grants Scheme (CCAGS), Croft House Grant Scheme and Crofting Cattle Improvement Scheme - are perennially under threat. A "coherent and predictable policy framework" demands a secure future for these schemes, giving crofters the confidence to invest their own money and effort.

Bureaucracy has in recent years placed a stifling burden on crofters, to the extent that it has forced many people out of keeping livestock. The principle of minimising the regulatory burden is to be welcomed, but as so much of this burden emanates from Europe, it is there that these battles will need to be fought. The imposition of EID for sheep, causing major cost and difficulty for no perceptible benefit is a case in point.

The role of crofting in maintaining landscapes and habitats in the north and west deserves greater recognition. Land-use policies are needed that reward the retention, and re-introduction, of extensively grazed livestock on the moors and hills. The last CAP reform created an exodus especially of sheep which has left large swathes of land abandoned.

These are typically on peat-based soils which, if not kept grazed, are at risk of fire followed by drying and erosion, and loss of carbon to the atmosphere. Maintenance and management of these resources by grazing (and other practices) are amongst the non-market goods that need to be recognised and rewarded. We are pleased to see that the Draft Strategy goes some way towards this.

In any case, a low-carbon economy will call for extensification of livestock production and a move back to marginal and upland areas, leaving better quality land for cropping.

We agree that where land is derelict or abandoned, measures are needed to ensure that it can be brought into use for food production, affordable housing, recreation or amenity.

In the crofting sector this means vigorously tackling croft absenteeism and neglect, and taking forward land reform so as to simplify and enable community land acquisition.

SUCCESSFUL LAND-BASED BUSINESSES (section 3 of draft Strategy)

Objective – Successful land-based businesses contributing to Scotland's prosperity and wellbeing

Strategic direction – towards a low-carbon economy.

Question 3a: Do you agree with the objective and strategic direction for land-based businesses?

Again, there is nothing new here, and nothing that anyone would disagree with.

Question 3b: Have we focussed on the right areas to achieve this objective and move us in this strategic direction?

There should be incentives for sustainable, productive land use, and disincentives for neglect and misuse. Where land is capable of food production that should be the priority, including the extensive production of store livestock which is by far the most significant output from the crofting areas. Energy and timber production, recreation and tourism can effectively work alongside food production. Low-carbon policies demand that food production and distribution chains be as short as possible, and this is particularly relevant in the Highlands & Islands where so much of the food consumed is trucked from the central belt and far beyond. The lack of resilience in such dependency has been illustrated in recent severe weather events. The sustainability of remote communities will demand far greater self-sufficiency in goods and services, especially food. Crofters, with their vast, but at present underused, land resource are in a strong position to supply such needs. To do so will require stability in support mechanisms as stated above. If the livestock sector in more remote areas is to fulfil its potential economic and environmental benefits a network of small abattoirs is a prerequisite. The country's few remaining local abattoirs are struggling to survive against escalating costs and bureaucracy, while other EU states seem able to maintain local provision.

In expanding woodland cover, the strategy should encourage more crofter forestry, woodland crofts and other community-managed forestry, making local processing and use of wood a priority and reducing long-distance transport of timber.

Question 3c: Are the actions identified the right ones to deliver the objective, and are there other actions which would be more successful or effective?
The actions are to "examine", "explore" and "influence", but not actually to do anything!

FLOURISHING NATURAL ENVIRONMENTS (section 4 of draft Strategy)

Objective – Flourishing natural environments delivering the widest range of benefits to Scotland, and playing their part in mitigating global climate change.

Strategic direction – better consideration of the natural environment.

Question 4a: Do you agree with the objective and strategic direction for natural environments?

Yes but there needs to be a change in the legislative and administrative way that way that we seek to safeguard the natural environment. The current approach of SNH as a bureaucratic, top-down and often arrogant organisation is counter-productive. SNH needs to be reformed.

Question 4b: Have we focussed on the right areas to achieve this objective and move us in this strategic direction?

There should be more consideration of the impact of reintroduced species. Where reintroduction has taken place, insufficient consideration has been given to its effects on those trying to make a living from the land. There should be no more reintroduction, or relocation, of species until these issues are properly addressed.

We are pleased to see the emphasis given to carbon conservation in peat-based soils.

Question 4c: Are the actions identified the right ones to deliver the objective, and are there other actions which would be more successful or effective?

Traditional crofting practice, such as extensive grazing of hills and moors, and cropping / fallowing on machair land has maintained these valued habitats and landscapes over hundreds of years. The importance of these practices is slowly being recognised by government and its agencies, but any support for these systems is largely delivered through Rural Priorities which is notoriously difficult, and an expensive gamble, to access.

Therefore there needs to be clear, simple and accessible support for beneficial land management practice, whether extensive grazing on peatlands, woodland management or machair cropping.

VIBRANT COMMUNITIES (section 5 of draft Strategy)

Objective – Vibrant, sustainable communities in urban and rural areas, with people connected to the land, enjoying it and taking an interest in its future.

Strategic direction – connecting people to the land.

Question 5a: Do you agree with the objective and strategic direction for vibrant communities?

Yes as far as it goes.

Question 5b: Have we focussed on the right areas to achieve this objective and move us in this strategic direction?

At present many small towns and rural centres in Scotland are in a state of decline. Larger centres have tended to suck in economic activity, businesses, services and employment. A low carbon economy requires that process to be reversed. For example, every working day there is an exodus of tradespeople travelling out from Inverness to serve the needs of communities in the north and west. Policies are needed that encourage remote communities to supply their own services, keeping money circulating in local economies and giving young people the economic incentive to remain in remote areas. Affordable housing is a prerequisite for this to take place, and crofting communities have a role to play in identifying and making available affordable land.

Land in the vicinity of medium to large settlements, and in areas of high visitor numbers, will be subject to recreational use. There is a need for land managers in these areas to be assisted to cope with such pressures, which might bring about issues such as vandalism and litter, disturbance of livestock, erosion of footpaths, etc. If there are easily accessible support measures available within SRDP more recreational opportunities will become available.

It is a matter of great regret that footpath maintenance measures within Land Managers Options were withdrawn.

Question 5c: Are the actions identified the right ones to deliver the objective, and are there other actions which would be more successful or effective?

It is disappointing that there is no reference here to the role of community ownership. It is becoming clear that land reform has not gone far enough in that the current provisions can be circumvented by obstructive land owners, and the will of communities and of Parliament can be frustrated. New crofting communities are a way of re-connecting people to the land, restoring sustainable and diversified land-use and economic activity, and enhancing biodiversity. For example, the empty heart of Sutherland, at present mainly a poorly-managed deer monoculture, could be restored to productive use, and provide land, homes and jobs. In the late 19th and early 20th centuries, government, in the guise of the Congested Districts Board and the Board of Agriculture, acquired land for restored crofting settlements. The time is right for a modern version of those initiatives.

We need planning guidelines to protect in-by-croft land from speculative development of non-affordable housing. There is no shortage of land in the Highlands and Islands for house building, and crofting communities are in a position to make affordable land available for affordable housing. Planning policies need to enable such provision which may be on common grazing land at the periphery of established settlements.

DELIVERING SUSTAINABLE LAND USE (section 6 of draft Strategy)

Question 6a: What would be the best way of placing the national objectives of the Land Use Strategy in a local context to assist land managers and local stakeholders?

As below.

Question 6b: Are there other actions which would assist local decision processes?

Reform of SNH and devolution of its functions to local offices. Government and its agencies decentralised from Edinburgh.

A simplified and accessible SRDP, with a transparent, do-it-yourself application process.

Question 6c: Are there measures additional to those already in place which should be considered to encourage the restoration of vacant or derelict land to economic, social or environmentally productive use?

As stated above, more community ownership would further such objectives, but this needs another stage of land reform in order to be achievable on a wider scale. In the crofting context, vigorous action by the regulatory authority is required in order to tackle absenteeism, misuse, neglect and speculation. This needs to be backed by planning policies that take account of the crofting situation and protect in-by-croft land from unsuitable and unsustainable development.

GENERAL

Question 7a: Do you see any conflicts, either within this draft Strategy or between it and other policies? If so what are they?

There are at present too many conflicts in rural policy to list. It is to be hoped that, if nothing else, the Scottish Land Use Strategy brings about joined up thinking through all levels of government and its agencies. This should encompass planning, housing, transport, food, health and employment. Policy needs to be genuinely 'rural-proofed'.

Question 7b: Do you see complementarities with other policy areas, which have not been explored in the draft Strategy?

As above.

Question 8: Are there any equality issues that the Strategy needs to address (relating to race, gender, disability, age, sexual orientation, gender identity or religion/belief)? If so, how could the Strategy be improved to meet those needs in a better way?

No Comments

Question 9: Are there any other groups in society that may be adversely affected by proposals in this Strategy? If so, how could the proposals be improved to meet their needs in a better way?

No Comments

Question 10: Are there any other points you wish to make about any aspect of this draft Strategy?

The draft strategy is a starting point, but it deals very much in generalities. We would wish the concept of "remoteness" to be addressed more strongly. Too much policy making is Edinburgh- (or Inverness-) centric and is divorced from the reality of life and work in Scotland's islands and remote mainland areas.

QUESTIONS ON THE ENVIRONMENTAL REPORT

Question 11: Is there any other baseline or environmental information which could be used to further inform the Strategic Environmental Assessment? Please provide details and evidence to support your response.

No Comments

Question 12: Do you think that the Environmental Report has captured the significant environmental effects of the Strategy? In your opinion has anything been overlooked? Please provide details and evidence to support your response.

No Comments

Question 13: Do you agree with the measures for enhancement already adopted by the Strategy and the additional enhancement and mitigation measures proposed for the final Strategy? Please provide details and evidence to support your response.

No Comments

Question 14: Do you agree with the proposed arrangements for monitoring identified in the Environmental Report? Please provide details and evidence to support your response. At present, statutory environmental monitoring is carried out by SNH, SEPA and SGRPID.

This process can often appear intimidating to land managers such as crofters. The process needs to be changed so that land managers are more involved in the process by, for example, the officials involved taking care to explain what they are doing and why, if necessary in non-technical language. As an example we would cite the processes involved in monitoring the highly-designated machair of the Western Isles, which is totally reliant on the practices of crofting agriculture.