



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

30 June 2013

Dear sir/madam,

### **Scotland Rural Development Programme 2014-2020**

The British Ecological Society is pleased to present its response to the Scottish Government's SRDP consultation. This submission has been prepared on the Society's behalf by the BES Scottish Policy Group, who specialise in responding to policy developments in Scotland.

The BES is the UK's learned society for the science of ecology, and is the oldest ecological organisation in the world. Our membership comprises over 4,000 ecologists worldwide, and through responding to policy consultations we aim to ensure that ecological research is brought to the attention of policymakers and used to inform decision-making.

We have completed the pro forma to assist with your analysis of responses, but would like to include here some additional overarching comments.

### **The Ecosystem Approach**

The government's commitment to embedding the ecosystem approach in rural development is to be welcomed – from an ecological perspective it is essential that the effects of land use are considered in terms of their interactive effects on the environment. However, this may be a big step for many landowners and development applicants, and the approach will need to be incorporated in simple ways at first. For instance, evidence given in support of a land use proposal could be expected to include a description of the likely positive and negative impacts on other ecosystem properties, referred to in simple terms such as water and soil quality, insect pollinators, birds, etc.

### **Identifying investment priorities for rural developments**

Identification of priorities for rural developments is not a trivial task. This should be a process in its own right, rather than a short stage in the development of the scheme. Arguably this process will need to start soon for the programme starting in 2021.

It is also noticeable that while there is a large emphasis on forestry in the list of investment articles, there is no specific reference to the maintenance and improvement of upland farmed landscapes (particularly those based on peatland). This does not represent a balance of the ecological importance of habitats in Scotland.

### **Monitoring the impact of the SRDP**

It is notable that monitoring the impact of previous Rural Development Programmes has not begun at the start of the relevant period – this delay has meant that it is harder to detect the impact of change, as the baseline is not effectively established and the monitoring period is reduced. Monitoring the impact of the new SRDP must begin as soon as it is implemented.

However, it is not practical to monitor all possible effects. Monitoring must prioritise, (a) common and high-spend actions to justify the use of resources, and (b) actions where there is currently little experimental evidence of effects. It should be noted that monitoring of actions that are uncommon presents difficulties in terms of creating a statistically significant dataset, and that there is a risk that the expenditure on monitoring is disproportionate to the cost of the action itself.

Monitoring could also be designed to build on existing data and schemes run by NGOs.

Other points made in our response include:

- A recent Scottish Natural Heritage report provides some information on developing priorities for species and habitats for Local Biodiversity Area Partnerships<sup>1</sup> - this may be useful in assessing proposals in a regional context
- Action at the landscape scale should be supported by empowering local networks and through the establishment of separate funds. Action at this scale aligns with the landscape approach articulated in the refreshed Scottish Biodiversity Strategy.
- Developing a descriptive map of holdings to help farmers understand the potential ecosystem value of specific holdings would provide a very useful source of data (particularly if it were a digital resource) for assessing ecological impacts of the SRDP, but may be hard to implement in practice. The BES would be interested in discussing how this type of map could be prepared and who could do this, drawing on knowledge of practices in other UK countries (under their own RDPs) and on wider ecological research.

We would be happy for our submission to be published, and for you to contact us for any further input necessary.

Yours faithfully,

Dr Lisa Norton  
BES Scottish Policy Group  
[lrn@ceh.ac.uk](mailto:lrn@ceh.ac.uk)  
[policy@britishecologicalsociety.org](mailto:policy@britishecologicalsociety.org)

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<sup>1</sup> PAKEMAN, R.J.; BEALE, C.; BROOKER, R.; CHAMBERLAIN, D.; DEMARS, B.O.L.; IASON, G.R.; MCLEOD, J.; LITTLEWOOD, N.; LISEWSKI, V.; TAYLOR, A.F.S. (2011) *Prioritising species and habitat actions by Local Biodiversity Action Partnerships in Scotland. Report to Scottish Natural Heritage.*