



THE HEATHER TRUST

Promoting Integrated Moorland Management

Less Favoured Area Support Scheme In Scotland (2010-2013)

17th December 2008

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CSU
Spur U5b
Saughton House
Broomhouse Drive
EDINBURGH
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Dear Sirs,

Consultation On The Less Favoured Area Support Scheme In Scotland (2010-2013)

Background

The Heather Trust welcomes the opportunity to provide a view on the future of the Less Favoured Area Support Scheme (LFASS) in response to the Scottish Government's consultation.

The Heather Trust is an independent charity dedicated to the promotion of high standards of moorland management. Working with a wide range of other organisations throughout the UK, the Trust seeks to improve moorland habitat for the benefit of wildlife, domestic stock, game, local communities and all people with an interest in moorland areas.

The Trust believes that a strong upland agricultural sector is essential for the proper management of our upland areas. Without proper control of vegetation by grazing the uplands will be in a very different condition: there will be more rank vegetation, more scrub and less biodiversity. In addition, the taller vegetation will have an associated higher risk of damage from wildfires with potentially serious consequences for peat soils and carbon storage.

In many areas, management by domestic livestock supports the other two main upland enterprises: grouse shooting and open hill deer stalking. While livestock farming has relied on support payments to maintain economic viability, grouse shooting and deer stalking receive no direct public funding but without grazing livestock sporting enterprises in many areas would not be viable. Therefore, the support for farming provides indirect support for sporting enterprises which are the mainstay of rural communities in many parts of the country.

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The impact of sheep ticks also needs to be considered alongside the direct impact of changes to grazing pressure. Ticks thrive in areas where there is a mat of warm, moist vegetation that allows them to over-winter. In some areas, there are concerns that reduced grazing pressure is combining with climate change; the expansion of scrub, rough grassland and woodland; and the expansion of the hill deer population to provide ideal habitat for ticks and this explains the increase range and abundance that is being reported. Ticks transmit a range of diseases such as Louping-ill, Tick Pyaemia to species of economic importance in the uplands and through Lyme disease also pose a risk to human health.

Consultation Response

We have followed the main questions asked in the consultation and our responses are given below:

Q1. What are your views on the use of "mountain area" designation and "specific handicap" designation for islands as outlined in Annex 3?

If it is necessary to review the classification of the areas within the LFA, every effort should be made to maintain or enhance the existing levels of support available to farmers in the critical areas of Scotland. If this reclassification proves to be necessary the designations of 'mountain area' and 'specific handicap' area could be useful for Scotland.

As we have stated elsewhere, re-targeting of LFA payments to reflect areas of greatest need and benefit would be supported. The use of the alternative designations might provide an opportunity to achieve this.

Q2. What are your views on the approach to calculating payments set out in Annex 4? Do you have alternative suggestions?

Within the concept of re-targeting of LFA payments the proposed approach would offer a rationale for achieving this. It is a complicated approach and there is a danger that the benefit to arrive from efforts to achieve fairness could be lost in over-complication.

Q3. What are your views on this rationale and these objectives for LFASS?

The Heather Trust supports these views.

Q4. Would you be in favour of continuing the current interim scheme with no significant changes?

It is suggested that it would be better to move to a scheme with revised targeting at the earliest opportunity. This would also offer the opportunity to address the anomalies caused by the reference to historic payments.

Q5. Would you be in favour of continuing the current interim scheme, but with some redistribution of payments? Do you have alternative suggestions?

The current, interim arrangements have some well-recognised shortcomings. It would be better to address these now and develop a better scheme. Clearly, the most

important issue is to maintain continuity of payment and certainty for farmers trying to plan their businesses and a shift to a new scheme should not be attempted if these two issues cannot be guaranteed.

With new arrangements, there will be winners and losers but the emphasis should be to direct payments to areas where there is greatest need and greatest potential for benefit and avoid 'money for nothing' payments.

Q6 What are your views on the principle of creating a closer link with livestock-related activity?

It is unacceptable for payments to be made to farms where there is no livestock-related activity. For upland management, management by livestock is essential and livestock enterprises should be given priority.

Q7 What are your views on the approach set out in paragraphs 6.4 - 6.6 on (i) creating a closer link with livestock-related activity, (ii) helping new entrants and others taking on land that did not attract LFASS in 2006, (iii) re-establishing the cattle-top up link?

(i) We would welcome a closer link between payments and livestock-related activity.

(ii) New entrants should be catered for to ensure that upland farming is not reliant on a dwindling number of ageing farmers.

(iii) There is concern about the reduction in cattle numbers. Mixed grazing by sheep, cattle and non-domestic herbivores at sustainable levels can produce the best management to maximise the income earning potential of upland areas and for landscape and biodiversity interests. We would welcome any measure that provided an incentive to reverse the current trends of the reduction of domestic livestock numbers.

Q8 How could delivery of environmental benefits be improved?

The LFASS forms a significant part of the Scottish Rural Development Programme (SRDP) which has a range of objectives, including environmental benefits.

However, the LFASS is non-competitive and in the areas of greatest need it provides an essential component of the whole farm income. Without the LFASS payment many farms in the remoter regions of Scotland would cease to be viable and the benefits provided by their management inputs would be lost.

We suggest that the LFASS should be re-targeted onto areas of greatest need where the value for money provided by LFASS would be a maximum. However, no additional environmental criteria should be attached to the payment.

Q9 What are your views on reallocating a proportion of LFASS money to other measures within the SRDP?

For the reasons set out above, we are not in favour of reallocation of funds away from LFASS. Although £61m is a significant amount of money, by the time it is spread

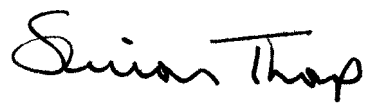
across 85% of Scotland's land area its impact is reduced. The aim should be to retain or enhance the real value of this funding.

Q10 Do you have any other suggestions for the second interim scheme?

No further suggestions.

We hope you find this response helpful. We would be pleased to contribute to further discussions if this would be useful.

Yours faithfully

A handwritten signature in black ink that reads "S P R Thorp". The signature is written in a cursive style with a large initial 'S'.

S P R Thorp
Director