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Dear Phil

## **SNH RESPONSE TO THE CONSULTATION ON THE DESIGNATION OF NEW AREAS FOR CROFTING**

### **Introduction**

Crofting characteristically involves small-scale, non-intensive land management, which is broadly beneficial for the natural heritage. It has kept people involved in land management and has helped to sustain rural communities and traditional land use systems that social and economic forces might well otherwise have undermined. Crofting provides greater security of tenure than most agricultural tenancies; it is perhaps more likely therefore to be associated with a longer-term and more sustainable approach to the management of the land.

Crofting areas are important for their wildlife, supporting significant populations of several nationally and internationally important species, and for their distinctive and attractive landscapes. Much of the wildlife associated with crofting depends on small-scale and low intensity farming that typifies crofting. Crofting townships often have a very characteristic landscape pattern, reflecting their origins in the planned and relatively regular division of land between holdings.

From a natural heritage point of view, it is critical to maintain the active management of croft land. Over the past fifty years, there has been a general decline in crofting land management and in the variety land use associated with crofting, and the decline appears to be continuing. The most significant consequences from a natural heritage point of view are a reduction in the area of traditional arable cropping, the abandonment of crop rotations, the earlier harvesting of both grass and cereal crops, and a decline in cattle and sheep.

We supported the proposal for 'proper occupier' status as a means of helping to ensure continuity of management.

### **Questions:**

- 1. Do you agree that new areas should be designated for Crofting?**

SNH supports the proposal of designating new areas for crofting, as well as the creation of new crofts on existing crofting areas. We are currently exploring the possibility of creating new crofts on the island of Rum, which is a National Nature Reserve in SNH's ownership.

The environmental benefits that might arise from the designation of new crofting areas would depend on the land being actively managed, and managed non-intensively on the small scale we associate with traditional crofting. While we would not expect all new crofters to adopt strictly traditional systems of management, we would expect them, as a condition of their tenancy, to manage the land and to conform to a standard of good environmental practice. We would not wish, however, to see the emphasis placed on regulatory regimes; rather we would stress the importance of encouraging positive action to manage the environment sympathetically.

If we expect new crofters in the areas designated to manage the land, then these areas should include land that is sufficiently fertile and productive to sustain the kind of management that could contribute to the crofter's income. The location of any new crofting areas, and the design of the buildings making up the settlements within them, is also important from a natural heritage point of view. There is a risk that they could impinge upon important wildlife sites or other natural features, or that they could adversely affect the landscape. To avoid this possibility, we would see merit in any proposal for a substantial new crofting scheme being subject to an environmental impact assessment.

Ideally, we would like to see each newly designated croft producing a land management plan, with an overall management plan being produced for the new crofting area. These plans would describe the proposed management of the land, identify any environmental risks and outline a strategy for maintaining or enhancing any significant natural features. In particular, they would identify the opportunity for the crofters to co-operate in these (and other) undertakings.

In many cases the potential natural heritage benefits will only be realised if new crofters in these areas have access to suitable agri-environmental measures in crofting grant schemes or Rural Development Contracts. Opportunities for advice and training will also be important, particularly for new crofters having no previous experience of land management. The Scottish Crofting Foundation's *'Introduction to Crofting'* course would be very suitable for this purpose – if the money could be found to ensure that it continues

We support the proposal to find ways of creating crofts on land owned by public sector bodies such as the Forestry Commission. It is important, however, that this should involve more than simply building a new house in woodland. As with other kinds of land, the creation of woodland crofts should be linked to positive management of the associated land, including the trees.

## **2. Do you agree that the new areas should align with those of Highlands and Islands Enterprise?**

Yes. We explain why in the answer to question 3.

### **3. Is there another area that has a stronger claim?**

Some of the arguments in favour of designating new crofting areas, such as reintroducing variety into the pattern of land management and increasing participation in land management, could apply equally well to many parts of rural Scotland. However, the kinds of areas where we can be reasonably certain that the natural heritage will benefit from the introduction of crofting agriculture are likely to be in the agriculturally more marginal parts - areas that already have crofting status or have land of similar character. The areas proposed in the consultation paper – the non-crofting areas of the Highland local government area, Arran, Bute, Cumbrae, and Moray, would seem to be the most suitable for what must at this stage be seen as an experiment. These areas, as the paper points out, have a historical connection with crofting and people living in them will be reasonably familiar with crofting land management. If the experiment is successful in these areas, we would like to see it extended, perhaps selectively and progressively, to other parts of Scotland.

### **4. Do you agree that Crofting Community Right to Buy (CCRTB) should not be extended to the new areas?**

Yes. Although this is not primarily an environmental matter, we see the benefits arising from the Community Right to Buy as heavily dependent on the presence of a functional community. Although it must be hoped that such active communities will develop in any newly designated crofting areas, it is impossible at this stage to be confident that this will happen. In these circumstances it seems premature to extend the right to buy to these areas, especially as it would risk attracting to them people who were less interested in crofting per se than in the prospect of buying larger tracts of land. We believe that the best way of promoting a vibrant community life within any new crofting townships is an aspect of the proposals that deserves further attention.

### **5. Any other comments**

### **6. Background**

Other: Non-Departmental Public Body.

Yours sincerely



**John Thomson**  
**Director of Strategy & Communications**