

Scottish Natural Heritage Consultation on: Planning for development: What to consider and include in Deer Management Plans for development sites

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The purpose of the document out for consultation is to provide guidance on a common approach for developers to use in producing deer management plans (DMP) for a development site where deer are present. The document extends to four pages and provides background information as well sections discussing roles, responsibilities, potential deer management issues, monitoring and reporting. This provides a brief overview of what a developer needs to consider and how they should go about planning for any deer related actions that need to take place. Underpinning this approach is the SNH Code of Practice for Deer Management and as such the draft guidance covers all the components that anyone with deer on their land needs to consider.

Our overall response to this draft guidance is that it covers the main steps in planning and evaluating management actions. However, by itself it does not provide a working document that a developer could follow. Our understanding is that it is probably not meant to provide step by step guidance but is to be used in conjunction with the available “best practice guidance” developed by the deer sector. We have two suggestions that may improve the utility of this draft guidance. First, it may be helpful if there was an annex that provided a worked example of how a deer management plan should be developed for a typical development site. Whilst not all sites will have the same issues, a worked example would demonstrate the level of information and types of actions that might be expected and therefore help developers to decide on the size and scope of an appropriate DMP on a development site. Second, the draft guidance could be annotated with links to the relevant best practice guidance documentation so that it is easy for developers to find out more about aspects such as habitat monitoring, deer population monitoring etc.

Below are some more specific comments on each of the sections:

Introduction, 2nd para: There is reference to the need for developers to consider deer welfare but the “code” also asks that the effect of deer management on other factors is considered, i.e. the social, economic and ecological impact - particularly those that may damage the public interest. The broader nature of the “Code” needs to be spelt out early on so that the policy driver for this is clear to those that it is intended for.

Section 2: This section mentions the responsibility to consider the impacts on neighbours which is correct but it also goes into the principles of the code. These may be better earlier in the document either up-front or in the introduction as mentioned in the previous paragraph.

Section 3: No comments

Section 4: (*What to consider.....*). This section covers most items and we welcome the emphasis on the need to understand neighbours' objectives if impacts of any deer management resulting from the development are to be comprehensively assessed.

Part c): Perhaps there needs to be specific mention of the need to collect baseline data on deer numbers using the development site and the neighbouring land. In addition, discussions with neighbours to gather information on deer movements or habitat preferences on the development in relation to the neighbouring area would be useful so that monitoring can detect changes from the baseline in order to assess the impact of the DMP. As the draft guidance mentions, mapping tools are invaluable in these situations yet there is little help in how to go about this.

Part d i): Quantifying carrying capacity is very difficult. What would be more informative is to provide guidance on identifying vulnerable habitats using the priority habitat classifications. There is existing guidance on how to assess habitat condition and the management that is needed to ensure these habitats are in favourable condition. This needs to be referred to.

Part d ii): The success of this is to understand the baseline numbers and the likely habitat preferences on the neighbouring ground versus the development area as mentioned above.

Part e): This mentions the word management without providing examples of what is actually a deer management activity. Options include culling and fencing and maybe a discussion of the pros and cons of these two activities is needed.

Part f): no comments

Part g): This section is essentially advocating an adaptive management approach linking the monitoring, reporting and the steering group so that there is scope to adapt the DMP as new information arises. Perhaps it is worth giving an example of how monitoring should be designed to measure specific impacts and that if the level of impact changes then the plan should change to reflect this. The guidance text may be misconstrued to mean that changes to the plan can only happen if the steering group approves. There needs to be room to change the plan if the evidence suggests a need to change and most but not all the steering group are satisfied.

Section 5: no comments