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SNH Consultation on:

Planning for development: What to consider and include in Deer Management Plans for development sites

Key contact: Justin Irvine Justin.irvine@hutton.ac.uk

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The document out for consultation is the revised version following the initial round of consultations in late 2013. Its aim 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 (for example, a wind farm). The document extends to seven pages compared to the original four. The main extra text is in Section 7 which illustrates a couple of scenarios where deer management relates to the planning system.

As in the earlier version, the document 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 Underpinning this approach is the SNH Code of Practice for Deer Management and as such the draft guidance highlights the main principles that need to be considered by anyone with deer on their land.

The revised version now addresses all the concerns and comments we had about the earlier draft (as details in our response of 23rd September 2013). The main points we identified in our previous response were 1) the guidance would benefit from providing a worked example; 2) the underpinning “Code of Practice for Deer Management” needs to be highlighted early on in the document and 3) the guidance should refer to best practice on deer management where relevant. The revised document has addressed these to some extent but we make the following comments on these three points:

1. The idea of a worked example has not been fully implemented or illustrated in the revised document. However, Section 7 does include some relevant scenarios. We still maintain that a worked example identifying the steps (perhaps as a flow diagram) would be helpful although we recognise it is not possible to provide examples relevant to every development context. This could start with the question “Are deer present on the area to be developed for all or part of the year?” and work through questions about size of the population, areas of priority habitat, potential impact of deer on natural heritage before and after management, impacts on economic and social objectives of neighbours and local community, monitoring approaches etc.

Perhaps the document could have this as an annex and more examples could be added to as the sector gains experience.

2. The importance of the Code of Practice for Deer Management is now clearly stated early in the document providing the reader with the policy context. The associated principles are now also clearly stated early on which provides a much clearer rationale for the guidance.
3. The guidance now provides clear links to Best Practice and other useful supporting documentation. If a worked example was included as an annex with live links to best practice this would be helpful to the prospective developer to see what useful guidance was already out there in relation to the different steps.

We feel it is important to provide a simple worked example to demonstrate that developing a DMS is not necessarily a complex or overly bureaucratic process and that much of the information and monitoring should be relatively straightforward to administer. A worked example would then perhaps help to encourage the development of DMS that are useful and relevant to the scale of the development

Finally, we feel it would be of value to emphasise the value of adaptive management in relation to deer management for a development site and for the neighbouring ground. The DMS should not be a fixed document and should be adapted as new information emerges. The use of a mapping approach to help illustrate natural heritage priorities as well as social and economic objectives can be useful in this regard. Whilst it is not the role of SNH to carry out the management planning for developers, it would be useful if the guidance could point to relevant data sources and perhaps help build capacity of advisors to utilise GIS approaches in order to make use of the wealth of spatial data for adaptive planning.