

## Tackling the nature emergency, deer and our National Parks

### Description

# Priority Actions For 2030

1. Accelerate restoration and regeneration		
Introduce statutory nature restoration Targets	Introduce a programme of ecosystem restoration	Continue to drive down and deliver substantially reduced deer densities across our landscapes
Take further action to ensure sustainable management of <u>grazing by sheep is compatible with the reduction in deer impacts</u> , so that ecosystem health as a whole improves	Implement Scottish Plan for INNS surveillance, prevention and control, and secure wider support measures to enable effective INNS removal.	Ensure grouse-moor management sustains healthy biodiversity

To claim that deer densities have been “driven down”, apart from by a handful of conservation landowners, is a gross exaggeration but at least the Scottish Government now understands there is point reducing deer numbers if they are replaced by sheep. Extract from draft biodiversity strategy

The Scottish Government’s consultation on “Tackling the Nature Emergency: Scotland’s Strategic Framework for Biodiversity” ([see here](#)), which was launched in September and includes proposals to reform Scotland’s National Parks, closes on 14th December.

To date I have only considered the Scottish Government’s undemocratic proposal to increase Ministerial control over appointments to National Park board appointments ([see here](#)). Here I consider the Scottish Government’s proposals for reducing deer numbers.

Judging by her public pronouncements ([see here](#)) Lorna Slater, the Minister responsible for National Parks and biodiversity, does seem to understand that overgrazing by deer is the biggest single reason for the collapse of nature in Scotland over the last thirty years. The problem, however, is the proposals in the consultation fail to address the system failures identified in the report of the Deer Working Group ([see here](#)) and set targets which, although a step forward, are still unfit for purpose:

- **Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.** Reducing herbivore impacts is one of the biggest levers we have in Scotland for reducing biodiversity loss and enabling regeneration at scale. It is a pre-requisite for many of our nature restoration activities including peatland and woodland restoration.

We will work with the deer management sector to secure average densities of 2 deer per km<sup>2</sup> in priority woodland, 5-8 deer per km<sup>2</sup> in the Cairngorms National Park, and more widely a maximum of 10 deer per km<sup>2</sup> nationally by 2030. This will require a minimum increase of 25-30% on current cull levels sustained over several years. Careful alignment of incentives and regulatory levers will be needed to achieve optimal herbivore densities and reduced grazing and browsing impacts to support biodiversity outcomes.

We will explore how best to support optimal herbivore densities to enhance biodiversity outcomes in the uplands.

The positive element of this proposal is the recognition that deer density should be no more than 2 per square kilometre in priority woodland.

While twenty years ago the general position was that deer densities of 10 per square kilometre were necessary to avoid ecological damage, work by Wildland Ltd and the National Trust for Scotland at Mar Lodge has shown there is no significant regeneration of native pinewoods unless deer numbers are reduced to two per square kilometre. That is now partially recognised by government, not just in the consultation but by bodies such as Forest and Land Scotland ([see here](#)) who state deer densities should be between 2-7 in woodland (compared to the 4-64 per square km currently found on their properties).

The questions for the Scottish Government, however, are:

- why two deer per square km only in priority woodland, which doesn't seem to be defined in the draft strategy, and why not across all woodland which would enable us to get rid of all forest fencing and plastic tree tubes?
- and why not for other priority habitats to enable other vegetation (such as moorland or summit heath) and not just trees to regenerate?

The proposed average deer density for the Cairngorms, 5-8 per square kilometre, is taken from the Cairngorms National Park Authority (CNPA) Partnership Plan adopted last year. It is not fit for purpose. With deer numbers in much of the Cairngorms Connect area and the restoration zone of Mar Lodge Estate at 2 per km, and even less in parts of the Angus glens and on King Charles Delnadamph estate where deer have been to all intents eradicated in favour of red grouse this is a license for other landowners in the National Park to maintain deer at well over 10 per square kilometre.

If we are serious about nature restoration deer should, as a start, be reduced to 2 per square kilometre across all of Scotland's protected areas. Strangely, the consultation makes no mention of Scotland's other National Park where deer currently cause massive problems. The Loch Lomond and Trossachs National Park Authority (LLTNPA)'s proposals for deer have just been published in their new National Park Partnership Plan which is to be considered at their board meeting on Monday ([see here](#)). Among their 'measures of success' no date is given for this 'target' are:

*'Track completion of Herbivore Impact Assessments for all Deer Management Groups and measure average deer densities. Achieve nationally recognised target levels of average deer densities currently a maximum of 5 deer per km<sup>2</sup> in woodland and a maximum of 10 deer per km<sup>2</sup> on the open hill'*

This target is even less ambitious than that for the Cairngorms and doesn't even mention the 'priority woodland' targets included in the Scottish Government's consultation. That is despite the many examples of moribund 'Atlantic Rainforest' oak woods in the National Park and the history of failed attempts to restore the Caledonian pinewood remnants to good ecological condition. This is a National Park Authority incapable of taking a lead and in need of radical reform.

While the targets set out in the Scottish Government's Strategy are unfit for purpose, they are also bound to fail because there are no proposals to change the voluntary system of deer management in the consultation. That voluntary system is once again falling apart with Deer Management Group (DMG)'s failing to publish up to date information on deer numbers or actions that have been agreed at meetings etc.

Here is an example from the Inverary and Tyndrum DMG, part of which is the Loch Lomond and Trossachs National Park and includes the Strone Estate. This is owned by Tom Turnbull ([see here](#)) who is chair of the Association of Deer Management Groups and so you might expect it to exhibit best practice:

## Inveraray and Tyndrum DMG

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## Meetings & Reports

### Meetings

The next meeting will be on Wednesday 26th April 2023.

The Group meets twice a year, in Spring and Autumn. Minutes of meetings are available below.

[Summary Minutes of ITDMG Meeting 10 November 2021](#)

[Summary Minutes of ITDMG Meeting 21 April 2021](#)

[Summary Minutes of ITDMG Meeting 5 Nov 2020](#)

[Summary Minutes of ITDMG Exec Committee Meeting 21 April 2020](#)

[Summary Minutes of ITDMG Meeting 6 Nov 2019](#)

[Summary Minutes of ITDMG Meeting 25 Apr 2019](#)

[Summary Minutes of ITDMG Meeting 1 November 2018](#)

[Summary Minutes of ITDMG Meeting 2 Nov 2017](#)

[Summary Minutes of ITDMG Meeting 28 Oct 2016](#)

### SNH Assessments of ITDMG

SNH carried out an assessment of ITDMG in 2014 against a benchmark of wide-ranging criteria. A re-assessment to measure progress was done in 2016. ITDMG have made significant progress over the two years, as can be seen from the two documents below which show the change from a mixture of green, amber and red boxes in 2014 to almost all green, a few amber and no red boxes in 2016. The assessment results can be downloaded below.

In March and April 2019, SNH carried out another re-assessment of all DMGs. They used the same criteria as before, but focussed on the delivery rather than planning aspect of Deer Management Plans. There was particular emphasis on four areas: 1) delivering designated sites to favourable condition; 2) addressing native woodland condition; 3) woodland expansion; and 4) carbon and peatland.

### Recent Posts

- [New Group Secretary sought for I&T DMG](#)
- [SNH 2019 assessment now online](#)
- [Privacy policy added](#)
- [SNH assessments now online](#)
- [Minutes of meetings now online](#)

Screenshot 8/12/23. No minutes published for two years, last assessment 2019 and the LLTNP is represented on this group!

Instead of reforming this failed system and committing to concrete actions, the biodiversity strategy commits the Scottish Government to "explore how best to support optimal herbivore densities in Scotland to enhance biodiversity outcomes in the uplands". The commitment to "explore" is not

good enough in a nature emergency and a recipe for years more inaction.

There are at least four actions the Scottish Government could commit to immediately if there was the political will which would have an immediate impact on deer numbers:

- 1) Make all public subsidies, whether for agriculture, peatland restoration, nature restoration or tree planting dependant on landowners showing they are both committed to reducing deer to 2 per square kilometre in protected areas and four elsewhere and evidencing that they are taking appropriate actions to achieve this;
- 2) Redirect existing subsidies for deer fencing and plastic tree tubes to employing stalkers and reducing deer to 2 per square kilometre and focus subsidies for planting in the uplands to slopes where landslips threaten human infrastructure
- 3) Implement the changes to the shooting seasons recommended by the Deer Working Group. While the Deer (Close Seasons) Amendment Order came into effect on 21st October 2023, it only changed the season for stags, not hinds ([see here](#) for a very interesting commentary on the serious limitations to the order by a stalker). If deer numbers are to be reduced we need to extend the period that hinds, whose numbers determine the overall population, can be culled.
- 4) Instruct NatureScot to use their intervention powers to the full to achieve (new) target levels and, if that is challenged in the courts, strengthen those powers.

There are other measures which would help reduce deer numbers, such a Carbon Emissions Land Tax ([see here](#)), but these would take longer to implement and are for the medium-term rather than the short-term.

Unfortunately, there are no proposals for legislative change in respect to red deer included in the consultation. This is a wasted opportunity but also an indication of how the Scottish Government is in thrall to traditional sporting estates whose raison d'être is to keep deer and grouse numbers artificially high. The challenge for Lorna Slater is to change that and turn her fine words into actions.

## Category

1. Cairngorms
2. Loch Lomond and Trossachs

## Tags

1. conservation
2. Deer
3. landed estates
4. LLTNPA
5. Scottish Government

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