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A Consultation on the Future of Land Reform in Scotland

The Executive Committee of Lowland Deer Network Scotland has given careful consideration to the proposals contained in the Consultation Paper. Our response to the Consultation questionnaire is attached.

There are two Proposals which have a direct bearing on deer management. Proposal 10 indicates additional or clarified powers of intervention for SNH in areas where collaborative management is not effective. We would wish to see detailed proposals prior to making comment. Collaborative management in the lowlands is of a very different character than in the red deer range which is largely covered by Deer Management Groups (DMGs). There are an increasing number of Lowland Deer Groups (LDGs) but coverage is somewhat piecemeal and the development of the LDG Network is at an early stage. LDNS, since its formation in 2011, has sought to involve all relevant lowland deer management interests, to promote a culture of collaboration, and to support existing LDGs and new or restructured Groups as they are formed. LDNS has also supported training and knowledge sharing and particularly commends the high level of professionalism among those who carry out deer management voluntarily and at no public cost.

We also note the proposal to remove the exemption from business rates for deer stalking. Most deer management in the lowlands is not carried out as a "sporting activity" and there are relatively few specialist deer management businesses. We are not clear from the Consultation proposals as to how business rates might be applied in this context but, should it be so, have no doubt that it would act against the objectives of the Lowland Deer Network and those who carry out an essential wildlife management function in the lowlands at no public cost. Their work has many public benefits, not least in limiting potential public safety risks and environmental and economic damage.

We would also take the opportunity to mention that, as business rates are raised as revenue for local authorities it is essential that local authorities become more engaged in active deer management, particularly on land which they own or where they have responsibility which is a duty for public bodies under the Wildlife & Natural Environment Act 2011. With a few notable exceptions LDNS has had limited success in engaging the participation of local authorities.

We hope the above comments are of value and will be taken into account in any legislative proposals.

Yours faithfully, R M J Cooke Chairman LDNS