

## Additional Information from ADMG on the Land Reform in a Net Zero Nation Consultation

The Land Reform Consultation document seeks to address two key issues: how land is owned and how land is managed.

## Land ownership

ADMG through its Deer Management Group (DMG) membership represents some 50 different groups covering around 3M ha of the Scottish uplands. Groups are comprised of clusters of properties (Deer Management Units) which seek to collaborate at a landscape scale. As land has changed hands and ownership objectives have evolved of time, these landscape scale mosaics of private, public and community owned land have become increasingly diverse and complex in structure and composition.

ADMG welcomes diversity in land management ownership models and the objective of ADMG as an organisation is to support DMGs in accommodating the objectives of all parties as well as the public interest to deliver landscape scale management where possible. This is best facilitated through the development of landscape scale deer management plans for all Deer Management Groups which have been comprehensively in place since 2016.

Regarding the scale of individual land holdings, ADMG can only comment from experience that landscape scale collaboration is undoubtedly easier to facilitate, undertake and effectively delivered with fewer landowners. Where deer management has been difficult to coordinate in the past, a limiting factor in facilitating effective collaborative deer management has been the challenge of not only identifying owners but agreeing practical, collective deer management actions between multiple "small" property ownerships. In one example an area of 75,000 ha has around 140 blocks ranging from 2 - 4,000 ha, averaging 500 ha in size. An effective collaborative approach to the management of an expanding red deer population has thus far been impossible to facilitate. Notably, there are only 2 properties over 3,000 ha.

## Land Management

ADMG members are responsible for delivering land management across 3m ha of the Scottish uplands. The effective future management and restoration of carbon rich soils and habitats along with the creation of new woodlands within the uplands of Scotland will be critical to targets on Net Zero and Biodiversity Restoration being met. Where the big wins for Government lie, is in the delivery of landscape scale projects, particularly with regards to identifying vital habitat connectivity.



Furthermore, the way in which we manage land in the future, should also contribute to more, not less, people living and working sustainably on the land and it is noted that the intention of the Scottish Government is that actions taken in pursuit of tackling climate change and increasing biodiversity must not have the effect of displacing people from the land.

The consultation document acknowledges that both public and private investment in our natural environment will be essential in tackling the climate and ecological crises. ADMG would welcome new conditions on those in receipt of public funding for land-based activity but recognises the vital importance of ensuring a joined-up approach between agricultural, climate, ecological and economic policies. The current lack of a coherent future plan for agriculture and biodiversity combined with the difficulty in understanding how and when the recommendations of the Deer Working Group will be implemented means that planning for the future of a rural business is currently extremely difficult.

We should learn from past experience that inflexible and overly complicated support schemes hamper the aspiration by many landowners to practically deliver actions on the ground. ADMG believes that imposing a more complicated and burdensome management plan approach on "large" landowners will only increase barriers to urgent future delivery of environmental, woodland or agri schemes. The time taken to develop these proposed individual plans, would in ADMG's view considerably hamper, constrain and detract from delivering urgent actions on the ground.

ADMG further considers that the greatest impact of this proposal would be on the effective delivery of collaborative deer management. ADMG's own analysis has identified that the proposal would impact 335 landholdings within existing DMGs that would cover an area of just under 2.5m ha, not including National Forest Estate properties. To add an additional layer of planning over and above current landscape scale deer management plans, would risk a move away from collaborative planning. In order to be effective, the delivery of proposed plans would still require a collaborative approach to red deer management which is only going to be more important in the future, not less.

Furthermore, with the expectation that landowners would be required to finance these individual plans privately, the consultation recognises that not all landowners have access to resources on this scale. Although it is also recognised in the consultation document that this would be taken into account in setting out what was required in terms of the level of detail the plans were required to contain, as well as requirements in relation to community engagement, ADMG believes that more targeted Government support to assist estates in drawing up "shovel-ready" estate action plans which would facilitate entry into multiple cross-policy schemes would be a much more effective and efficient way of delivering on multiple management objectives.