

HOUSE OF COMMONS - GROUSE SHOOTING INQUIRY

**WRITTEN
SUBMISSION OF
LUKE ANTHONY
STEELE**

- 1. I, Luke Anthony Steele, of [redacted], am an interested party to this consultation as Spokesperson for Ban Bloodsports on Ilkley Moor and will say as follows:**

2. Ban Bloodsports on Ilkley Moor has, for the past two years, closely monitored management of the uplands in Bradford Metropolitan District which are used for grouse shooting, including related practices such as heather burning and draining. In recent years discussion on these issues has become more apparent, with growing awareness of the contribution grouse shooting makes to flooding, degradation of natural habitat and an understanding that moorland which dominates flood-hit regions, such as our own, is failing to act as a vital flood barrier. As a consequence, a number of political calls have been made for upland landowners to manage moorland in a way which mitigates these risks, including from Kerry McCarthy MP (former Shadow Minister for EFRA)¹, Barry Gardiner MP (Shadow Minister for Energy & Climate Change)², Daniel Johns (Head of Adaptation, Committee on Climate Change)³, Craig Whittaker MP (Calder Valley)⁴ and West Yorkshire local authorities⁵. It has also been suggested Council-owned Ilkley Moor “could be vital” to controlling flooding in parts of the district⁶.

¹ Yorkshire Post. 2016. Farmers need to change ways to avoid further flooding. [Online] Available at: <http://www.yorkshirepost.co.uk/news/farmersneedtochangewaysstoavoidfurtherfloodingjeremycorbysenvenvironmentspokespersonwarns17657655> [Accessed 05/10/2016]

² Parliament. 2016. House of Commons Hansard Debates for 07 January 2016. [Online] Available at: <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm160107/debtext/1601070001.htm#16010722000297> [Accessed 05/10/2016]

³ Financial Times. 2015. Call to close grouse moors to prevent flooding [Online] Available at: <http://www.ft.com/cms/s/0/543de6d2aee11e5993bc425a3d2b65a.html> [Accessed 05/10/2016]

⁴ Parliament. 2016. House of Commons Hansard Debates for 27 January 2016. [Online]. Available at: <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm160127/debtext/160127-0004.htm>

⁵ BBC News. Yorkshire moorland owners council help reduce flooding [Online] Available at: <http://www.bbc.co.uk/news/uk-england-35395287> [Accessed 05/10/2016]

⁶ Telegraph & Argus. 2016. Ilkley Moor ‘could be vital’ to controlling flooding in Wharfedale. [Online]. Available at: http://www.thetelegraphandargus.co.uk/news/14461394.Ilkley_Moor__could_be_vital__to_controlling_flooding_in_Wharfedale/ [Accessed 05/10/2016]

Prioritisation of grouse shooting interests

3. It is important to the context of this submission to understand that the ‘sport’ of grouse shooting can only exist through moorland being managed in a particular way - as a monoculture, where habitat which promotes an artificially high stock of red grouse is prioritised. Consequently, much of the uplands in regions where game bird shooting proliferates land is intensively maintained for heather dominance, given the flora makes up around 90 per cent of the red grouse diet.

Draining the uplands

4. Heather growth reaches its peak when located in dry soil. In order to maintain such a habitat, upland managers conduct moorland ‘gripping’, which involves construction of channels to drain ecologically-important blanket bog. Research by the University of Leeds has shown this succeeds in causing peatland to not store water and diverts rainfall. However, the technique creates ‘quickflow’ from the uplands, which increases the flashiness of nearby waterways⁷ and contributes to flooding in lowland valleys.
5. It is noteworthy that the Moorlands Association, the body which represents grouse moor owners, has made unsupported claims in the media following the Boxing Day floods that its members have blocked up many grips. However, Ban Bloodsports on Ilkley Moor rejects such propositions as political positioning, conducted in the face of unprecedented public concern surrounding the contribution of upland management to flood risk. In May 2015, our investigators documented installation of a significantly sized drainage ditch on Morton Moor, Keighley, which is owned by Yorkshire Water and forms part of the larger upland area commonly known as Rombalds Moor. Sporting Rights, which allow for management for grouse shooting, are leased to the Bingley Moor Partnership, whose Lead Partner includes former-Chairman and current member of the Moorlands Association, Edward Anthony Bromet. The Aire Valley, which suffered serious flooding throughout, including unprecedented river levels in my

⁷ Holden, J. 2009. A grip-blocking overview. Moors for the Future. [Online] Available at: [http://www.moorsforthefuture.org.uk/sites/default/files/Holden%20\(2009\)%20grip%20block%20review.pdf](http://www.moorsforthefuture.org.uk/sites/default/files/Holden%20(2009)%20grip%20block%20review.pdf) [Accessed 05/10/2016]

community which engulfed our high street, residential and commercial properties, falls directly below the moor.

6. It is with much concern in July 2016, that investigators attached to campaign group Animal Aid documented what can only be described as a sizable increase in intensive management of the Bingley Moor Partnership Estate. Large drainage ditches were found to have been recently installed across both Morton and Bingley Moors, again under lease from Yorkshire Water for grouse shooting.
7. In circumstances where moorland managers are unlikely to receive necessary permissions for gripping, grouse shooting operations will on occasion include drainage in applications for refurbishment packages. In February 2016, BBIM investigators documented drainage installed during the construction of grouse butts on Ilkley Moor. These works were conducted under the auspices of the Sporting Rights agreement between the City of Bradford Metropolitan District Council and Bingley Moor Partnership, which allows for the publicly-owned land to be managed for grouse shooting. Additional drainage has been installed during the repair of vehicle tracks, which are used to access shooting butts, across Rombalds Moor. Rainfall is diverted into nearby becks and gulleys, leading to the River Aire and Wharfe, with visible erosion caused during the Boxing Day downpours due to the sheer volume of water exiting the land. This is undoubtedly contributing to flooding in the Wharfe and Aire Valleys.

Burning the uplands

8. Moorland managers routinely speed up the heather growth cycle by performing rotational burning - a harmful technique which literally involves setting fire to large patches of vegetation. Burning takes place on approximately 25 per cent of England's deep peat moorlands⁸. Use of the practice has markedly intensified in recent years, including in the Pennines, parts of which have seen a 50 per cent increase since 2001⁹. Research conducted by the University of Leeds outlines how rotational heather burning

⁸ Brownfield Briefing. 2014. Peat restoration can help prevent floods. [Online] Available at: <https://brownfieldbriefing.com/35977/peat-restoration-canhelp-prevent-floods> [Accessed 05/10/2016]

⁹ Douglas, J.D.T. *et al.* 2015. Vegetation burning for game management in the UK uplands is increasing and overlaps spatially with soil carbon and protected areas. *Biological Conservation*. Volume 191, November 2015, Pages 243 - 250.

alters peat hydrology, degrades blanket bog¹⁰ and reduces growth of important peat-performing vegetation, including sphagnum moss¹¹ and juniper¹². As a consequence of depleted water stores, the practice contributes to flooding, with run-off water significantly greater from uplands in burnt river catchments¹³.

9. In February 2016, BBIM investigators documented a heavily burnt stretch of moorland which spans across the North East of Ilkley Moor and North West of Burley Moor, between Ilkley and Burley Woodhead. The area, which should consist of blanket bog, has largely ceased to perform as a natural reservoir. Run-off has visibly caused significant erosion on the sloping face of the moorland, resulting in the flooding and breaking up of Hangingstone / Moor Road. This has a direct impact on the quality of life for residents of Ilkley and neighbouring towns, which are literally cut off by flood waters during inclement weather, as Moor Road becomes physically impassible¹⁴ and the River Wharfe swells. Similarly, other sections of Rombalds Moor have been heavily burnt, with the intensity of burning increasing in recent years. This results in run-off water, which would typically be absorbed by properly functioning peat bog, flowing into major settlements downstream, including Bingley, Saltaire and Leeds.
10. It is my understanding this situation is not unique. The nearby A59 Skipton to Harrogate road was closed following the Boxing Day floods due to repeated fears of a landslide from bordering Kex Gill Moor¹⁵, which is also heavily burnt for grouse shooting. This has resulted in a lowered quality of life for residents, serious disruption to commuters who work in nearby towns and economic loss to businesses which rely on transportation of goods¹⁶.

¹⁰ Brown, L.E., Holden, J. & Palmer, S.M., 2014. Effects of Moorland Burning on the Ecohydrology of River basins. Key findings from the EMBER project. University of Leeds.

¹¹ Brown, L.E. et al. 2014.

¹² Mustin, K., Newey, S., Irvine, J., Arroyo, B., Redpath, S. 2014. Biodiversity impacts of game bird hunting and associated management practices in Europe and North America. The James Hutton Institute.

¹³ Holden, J. 2015. Impact of prescribed burning on blanket peat hydrology. *Water resources research*. Volume 51, Issue 8. Pp 6472 - 6484.

¹⁴ Ilkley Gazette. 2015. Ilkley cut off in Boxing Day floods. [Online]. Available at: http://www.ilkeygazette.co.uk/news/14173163.ilkley_cut_off_in_Boxing_Day_floods/ [Accessed 05/10/2016].

¹⁵ BBC. 2016. A59 at Kex Gill to remain shut until February due to landslide risk. [Online]. Available at: <http://www.bbc.co.uk/news/uk-england-york-north-yorkshire-35333447> [Accessed 05/10/2016]

¹⁶ Harrogate Advertiser. 2016. A59 Kex Gill closure: 'Enough is enough'. [Online]. Available at: <http://www.harrogateadvertiser.co.uk/news/local/a59-kex-gill-closure-enough-is-enough-1-7673723> [Accessed 05/10/2016].

11. Burning of moorland has additional environmental impacts, including contributing to climate change through carbon emissions. The Committee on Climate Change has estimated that some 350,000 tonnes of carbon dioxide each year are emitted from upland peat in England, the majority of which - some 260,000 tonnes - is as a result of grouse moor burning¹⁷.

Impact on wildlife

12. Grouse shooting estates routinely purge the uplands of native predators by trap, snare and gun. This ensures there is a plentiful stock of game birds for the guns.
13. Snares, which are used to capture foxes, result in animals suffering a slow and agonising death due to injury or starvation¹⁸. Additionally, the devices are indiscriminate. A 2012 report by DEFRA on Snaring in England and Wales found that fewer than 25 per cent of animals caught were foxes. The other three quarters included badgers, cats, dogs and deer¹⁹. Fell runners using upland tracks have also reported being injured by snares²⁰.
14. Fenn traps are designed to kill smaller species, including stoats, weasels and rodents. The method causes unnecessary suffering to animals and is consequently being considered for a ban as part of the Agreement on International Humane Trapping Standards²¹. There has also been a number of instances reported of non-target species, including protected birds, being caught²² and gamekeepers not checking the traps within the regulatory period²³.

¹⁷ Committee on Climate Change, Adaptation Sub-Committee Progress Report, 'Managing the land in a changing climate', 10 June 2013

¹⁸ RSPCA. 2016. Protecting wildlife and disease from other dangers. [Online]. Available at: <https://www.rspca.org.uk/adviceandwelfare/wildlife/inthewild> [Accessed 05/10/2016]

¹⁹ DEFRA. 2012. Determining the extent of use and humaneness of snares in England and Wales. [Online]. Available at: <http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=14689> [Accessed 05/10/2016]

²⁰ BBC News. 2015. Runners injured in animal snares. [Online]. Available at: <http://www.bbc.co.uk/news/science-environment-32503789> [Accessed 05/10/2016]

²¹ Game and Wildlife Conservation Trust. 2016. Agreement on International Humane Trapping Standards. [Online]. Available at: <http://www.gwct.org.uk/advisory/faqs/aihts/> [Accessed 05/10/2016].

²² Mark Avery. 2016. Ringed ousels. [Online]. Available at: <http://markavery.info/2016/07/05/ring-ousels-moors/> [Accessed 05/10/2016]

²³ Telegraph and Argus. 2014. Ilkley Moor gamekeeper tells of 20 traps to keep vermin down. [Online]. Available at: http://www.thetelegraphandargus.co.uk/news/11200349.Ilkley_Moor_gamekeeper_tells_of_20_traps_to_keep_vermin_down/ [Accessed 05/10/2016]

15. Illegal persecution of birds of prey, including hen harrier, red kite, and peregrine falcon, also remains a key problem for upland wildlife. The National Wildlife Crime Unit (NWCU) noted in its 2013 Strategic Assessment that, “[i]ntelligence continues to indicate a strong association between raptor persecution and grouse moor management”.
- ²⁴ This has manifested itself in a number of recent, high profile examples of birds of prey being unlawfully targeted in moorland locations, including an estate employee cautioned for setting pole traps²⁵ and red kites being shot²⁶. Crime statistics show that 75 per cent of those prosecuted for bird persecution between 1996 - 2008 were gamekeepers²⁷. The result is that no hen harriers bred on grouse moors in 2016²⁸ and a “bird of prey crisis” in areas, including the Peak District National Park²⁹.

Economic cost of grouse shooting

16. The Moorland Association has historically produced a number of valuations on the economic worth of grouse shooting, which range from £12m in 2001³⁰ to £67m³¹. The only published source hitherto relates to the 2001 figure, which results from surveys submitted by Moorland Association members³². Both statistics are seemingly contradicted by a statement made in 2010 by then-Chairman of the MA, Edward Bromet, who told the Yorkshire Post “most moors did not generate a profit”³³.

²⁴ RSPB. 2014. Bird Crime Report 2014. [Online]. Available at:

https://www.rspb.org.uk/Images/birdcrime_2014_tcm9-410409.pdf [Accessed 05/10/2016].

²⁵ West Moreland Gazette. 2016. Man cautioned after setting banned bird of prey traps on Dales shooting estate. [Online]. Available at:

http://www.thewestmorlandgazette.co.uk/news/14540565.Man_cautioned_after_setting_banned_bird_of_prey_traps_on_Dales_shooting_estate/?ref=mrb&lp=7 [Accessed 05/10/2016].

²⁶ Yorkshire Post. 2016. Seventh red kite killed in Yorkshire in just two months. [Online]. Available at:

<http://www.yorkshirepost.co.uk/news/crime/beyond-belief-seventh-red-kite-killed-in-yorkshire-in-just-two-months-1-7926447> [Accessed 05/10/2016]

²⁷ RSPB. 2008. Birdcrime Report 2008. [Online] Available at: https://www.rspb.org.uk/Images/birdcrime_tcm9-226049.pdf [Accessed 05/10/2016]

²⁸ RSPB. 2016. An update on England's hen harriers. [Online]. Available at:

<http://www.rspb.org.uk/community/ourwork/b/martinharper/archive/2016/06/06/an-update-on-england-s-hen-harriers-in-2016.aspx> [Accessed 05/10/2016].

²⁹ Yorkshire Post. 2016. Bird of prey crisis in Peak District National Park. [Online]. Available at:

<http://www.yorkshirepost.co.uk/news/analysis/birds-of-prey-in-crisis-in-the-peak-district-national-park-1-7803889> [Accessed 05/10/2016].

³⁰ Moorland Association. 2001. Glorious 12th 'vital' for uplands economy. [Online]. Available at:

<https://web.archive.org/web/20021206103043/http://www.moorlandassociation.org/newsshow.asp?art=32> [Accessed 05/10/2016].

³¹ Yorkshire Post. 2011. Grouse season 'brings millions to region'. [Online]. Available at:

<http://www.yorkshirepost.co.uk/news/grouse-season-brings-millions-to-region-1-3653224> [Accessed 05/10/2016].

³² Moorland Association. 2001. Glorious 12th 'vital' for uplands economy. [Online]. Available at:

<https://web.archive.org/web/20021206103043/http://www.moorlandassociation.org/newsshow.asp?art=32> [Accessed 05/10/2016].

³³ Yorkshire Post. 2011. Grouse season 'brings millions to region'. [Online]. Available at:

<http://www.yorkshirepost.co.uk/news/grouse-season-brings-millions-to-region-1-3653224> [Accessed 05/10/2016].

17. Estimates surrounding the economic value of grouse shooting are trumped when considering the wider negative economic impact of this activity. As already outlined, upland draining and burning, which is conducted to engineer higher densities of game birds, contributes to increased flood risk in valleys below. Flooding on Boxing Day 2015, which local authorities have partly attributed to poor moorland stewardship³⁴, removed £5bn from the economy of flood-hit regions³⁵. In addition, businesses in these areas are suffering high insurance premiums, some can no longer secure cover³⁶, whilst others have been forced to close operations entirely at the cost of jobs³⁷.
18. Grouse shooting additionally displaces sectors which are significantly important to rural communities, including that which surrounds leisure and tourism. On Ilkley Moor in West Yorkshire, those which use the facility during grouse breeding and shooting season have been evicted from the land³⁸, suffered confrontations³⁹ or feared for their safety⁴⁰, despite having unrestricted right of access⁴¹. The Yorkshire Dales National Park Authority (YDNPA) has also warned that wildlife crime associated with grouse shooting is harming the region's reputation⁴². A recent survey conducted by Natural England shows these outdoor activities, and many others, are significantly more popular than all forms of game shooting⁴³.

³⁴ BBC News. Yorkshire moorland owners council help reduce flooding [Online]. Available at: <http://www.bbc.co.uk/news/uk-england-35395287> [Accessed 05/10/2016]

³⁵ The Guardian. 2015. Cost of UK floods tops £5bn, with thousands facing financial ruin. [Online]. Available at: <https://www.theguardian.com/environment/2015/dec/28/uk-floods-costs-financial-ruin> [Accessed 05/10/2016]

³⁶ Yorkshire Evening Post. 2016. Sky-high business premiums 'can make having insurance pointless'. [Online]. Available at: <http://www.yorkshireeveningpost.co.uk/news/sky-high-business-premiums-can-make-having-insurance-pointless-1-7697894> [Accessed 05/10/2016].

³⁷ BBC News. 2016. Tyssen Krupp Woodhead: Final shift at flooded Kirkstall firm. [Online]. Available at: <http://www.bbc.co.uk/news/uk-england-leeds-36167675> [Accessed 05/10/2016].

³⁸ Bradford Metropolitan District Council. 2012. Ilkley Moor Sporting Rights Deed Review. [Online]. Available at: <https://www.bradford.gov.uk/media/2126/ilkleymoorsportingrightsdeed.pdf> [Accessed 05/10/2016].

³⁹ Ilkley Gazette. 2009. Apology after gamekeeper confronts dog walker. [Online]. Available at: http://www.ilkleygazette.co.uk/news/4670616.Call_for_Ilkley_Moor_rules_to_be_made_clearer/ [Accessed 05/10/2016]

⁴⁰ Telegraph and Argus. 2015. Walkers join calls for change in policy over Ilkley Moor grouse shoots. [Online]. Available at: <http://www.thetelegraphandargus.co.uk/news/13369133.display/> [Accessed 05/10/2016].

⁴¹ Bradford Council. 2016. Access on Ilkley Moor. [Online]. Available at: <https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/access-on-ilkley-moor/> [Accessed 05/10/2016]

⁴² Grough. 2016. Yorkshire Dales boss: 'bird of prey persecution is harming park's reputation'. [Online]. Available at: <http://www.grough.co.uk/magazine/2016/06/07/yorkshire-dales-boss-bird-of-prey-persecution-is-harming-parks-reputation> [Accessed 05/10/2016].

⁴³ Natural England. 2016. Rural visitor survey. [Online]. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/452934/mene-march-may-2015.pdf [Accessed 05/10/2016].

Conclusion

19. There is a clearly sufficient evidence to demonstrate that management of the uplands in a way that is necessary to sustaining grouse shooting has a wide range of significant and negative impacts. Draining and burning, a key component of artificially engineering high numbers of game birds, depletes blanket bog and vegetation. This ensures rainfall cannot be absorbed, creating run-off and increasing flood risk in the valleys which fall below moorland. The result is serious damage to the economy, livelihoods and businesses. Further, the sport displaces leisure and tourist industries by interfering with interests, such as walking, running and wildlife watching, and deterring visitors. Whilst moorland interest groups maintain that shooting generates income, each valuation provided is significantly outweighed by these effects.
20. In addition to these considerations grouse shooting is detrimental to wildlife conservation. Both snares and traps used to remove native predators have implications on animal welfare by their own right. But also these devices catch a high number of non-target species, including companion animals and those protected by law. Illegal raptor persecution is also endemic on grouse moors to the extent some species, such as hen harriers, are almost extinct and others are following the same trend.
21. There is appetite for a ban on driven grouse shooting. This is shown both among the changing public perception of the sport, greater awareness of its negative impacts, as well as bans introduced by local authorities, which - which one exception - are prohibiting the practice on their upland estates. The remaining Council has committed to launching a consultation imminently, which will consider whether grouse shooting should be allowed to continue to take place. However, on a national level it is recognised an immediate ban could be considered 'too much too soon'. Therefore intermediate steps should be considered for the immediate future, which includes the introduction of vicarious liability and a rigorous licensing system.

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