



The Exmoor Society

Conserving Exmoor for All

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Dear Sarah,

At our meeting on 12 June 2019, I promised a letter on behalf of the Exmoor Society to you and Dan Barnett updating you with our views on game shooting. I am authorised to write by the Society trustees having presented my observations for their consideration.

I am aware that I am privileged to be entrusted with information and opinion from all sides. With that goes responsibility to use what is confided in me in a scrupulously dispassionate, balanced and objective way. A reason for this letter being delayed was my wish to meet the new GESA (Greater Exmoor Shooting Association) chairman, Ben Williams. I have now done so, and I thank Ben for his thoughtful and considered responses to points I made.

As I continue to accumulate views and evidence about the practice of Exmoor game shooting the critical issues have become thrown into sharper relief. I reiterate the scope and limits of Exmoor Society interest. These are defined by its Constitution, quoted in paragraph 4 of our report to ENPA, 'Game Shooting in Exmoor – Exmoor Society Perspectives'. Observations are made in the context of statutory purposes for National Parks. Game shooting is a legal activity, and Society concerns about game shooting are no different from any others that may arise from use of Exmoor National Park for public benefit.

The scale issue

The core issue is the scale of game shooting (essentially of pheasants) and its implications given the statutory purposes for the National Park.

1. Sport for whom?

Local people who engage in small-scale rough shooting and syndicate sport feel their interests are overlooked, indeed swamped, relative to those of large-scale commercial shoots. GESA is perceived as having been attentive only to the latter interests. It is believed that the problem has worsened as the scale of commercial shooting has increased over time.

2. Landscape impact

A personal anecdote tends to reinforce the previous observation. For decades I have walked on Winsford Hill above the Punchbowl. A few weeks ago, I was taken aback by what appears to be a marked expansion since last year of rearing pens and the area of game crops in the vicinity of Ash Lane between Winsford and Comer's Cross. Also, for the first time I noticed a field in the

Liscombe direction which appears to host game crops. Perhaps I am sensitised to what I saw because I visited the Winsford area with shoot managers last summer as part of my investigations. Incidentally, the managers could not have been more helpful, informative and courteous. I emphasise that I have no grounds for supposing that Winsford is unique, and certainly not that anything observed is impermissible. Other locations on Exmoor may have changed similarly, but currently I have no evidence of that. It is important to establish the facts.

The most obvious consequence of increasing scale - the striking feature of my example - is how it transforms the landscape. In the example cited, viewed from a distance the regular pattern of rearing sheds and pens is out of character with the surrounding environment, none more so than the bright orange colour of gas cylinders for heating attached to the rearing sheds. Generally, game crops set high on hillsides can be visually obtrusive, especially when plots are cleared and cultivated.

The Society's report already has drawn attention to the visual impact of feeders. Above all, it is the density of shoot infrastructure that takes and dominates the eye. Regarding location of release pens, despite signs of improvement in recent years there are still places where the high number of live pheasants on public rights of way, especially because they are reared close or adjacent to roads, is inconducive to people's appreciation of Exmoor's special qualities. The problem is exacerbated when carcasses carpet the road.

3. Noise disturbance

A recurrent theme of communications I receive is noise at all stages of shoot activity – from daily motorised activity in tending pheasants, bird scarers, and shooting itself. Self-evidently, this is experienced most commonly in and around settlements to the detriment of Exmoor's characteristic tranquillity.

4. Sport for what?

Large-scale shoots validly stress two benefits of their activities, a) ecological benefits for wildlife from the favourable choice and sensitive management of game crops, and b) income and employment opportunities generated. Both are economic benefits, the former in terms of environmental enhancement (adding to natural capital) and the latter directly improving people's well-being. But no benefit is obtained without cost. Trade-offs to consider are the extent to which a burgeoning pheasant population can adversely affect indigenous ecology, and who precisely are the beneficiaries from income and employment. It is local impacts that matter for Exmoor, to be assessed in the context of National Park statutory purposes.

The Sandford Principle prioritises conservation, enhancement of natural beauty, wildlife and cultural heritage over the duty to seek to foster the economic and social well-being of local communities within the National Parks. Field sports, and therefore game shooting, are properly regarded as part of Exmoor's cultural heritage. Sandford and the well-being of local Exmoor communities are compatible, but with caveats. Most important is that large-scale shooting must not be competitive with, but complementary to, other purposes for the National Park. Any National Park is a public resource for public benefit, not a public resource to be used for private benefit.

The law and good practice

From a legal standpoint, game shooting is complex. It is not essential for food production. The primary purpose is recreation. Not an agricultural activity, there are implications for its relationship with farming. Those aspects merit closer scrutiny, especially in the context of anticipated changes in agricultural policy and how they are likely to affect the prospects for Exmoor farmers. Some farmers not currently engaged may be tempted to resort to game

shooting as a means to supplement income, with obvious implications for its future scale and role in the National Park.

Aside from strictly legal matters, the British Game Alliance 'Code of Good Shooting Practice' (<https://www.britishgamealliance.co.uk/standards/>) is an excellent template against which Exmoor game shooting can be monitored and appraised. GESA is commended for its aim of promoting acceptance of the Code to help meet National Park Authority purposes (see Response from ENPA and Game Shoots Working Group, 12/12/2018). It is recommended that shoots publicise their adoption of the Code.

Conclusions

As a basis for further discussion and decisions, I suggest the following.

1. There are grounds for reviewing the extent to which growth in commercial game shooting is compatible with the wider purposes of Exmoor National Park as defined by national legislation.
2. Exmoor's is a small community with a strong identity and shared sense of responsibility to protect its status as a very special place. There is ample scope for amicable negotiation of compromises about the conduct of game shooting. An essential first requirement is to separate myth from reality. For instance, it has been categorically asserted to me that certain individuals are against game shooting. Unless I am deceived – which I would dispute – that is not true. Criticism is not opposition and must not be interpreted as such.
3. Sound evidence is necessary for good decisions. The National Park Authority may wish to consider how best to go about building the evidence base. A simple and informative starting point is to maintain over time a photographic record of Exmoor places considered especially susceptible to landscape change. (This method anyway is highly desirable for another purpose, documenting the accumulating effects of climate change).
4. Finally, my discussions over the past year make me optimistic that problems can be satisfactorily resolved. Goodwill is the hallmark of attitudes expressed. Especially, I believe that GESA already has begun to respond constructively. The ideal outcome would be for the large-scale commercially oriented shoots voluntarily to limit their size, locate game cover crops and rearing and release pens discretely with explicit consideration for landscape and ecological impact, and actively take steps to minimise all sources of noise pollution.

You appreciate that in a long letter I shall not reprise issues documented in Exmoor Society's December 2018 report. None of the above is confidential but, I hope, a further contribution towards resolving contentious issues about Exmoor game shooting for the general good.

Yours sincerely,



Dr Keith Howe
Vice-chairman
The Exmoor Society

cc. Dan Barnett, Access and Recreation Manager