

Louise Beardmore
Chief Executive Officer
United Utilities Plc
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2 August 2023

Dear Ms Beardmore

I am writing to you regarding the recent announcement that United Utilities will not be renewing shooting leases on its land. You have claimed that the management of water quality, quantity, and flood mitigation as United Utilities responds to the challenges of climate change are the reasons for that decision. However, there is no evidence to substantiate the claim that banning upland and lowland shoot management will have any beneficial impact on these issues. Meanwhile, you have ignored the very obvious and far-reaching environmental, economic and social impacts that this decision will have on rural communities. It is quite clear from the evidence that the decision is entirely self-defeating and that it will work against the declared objectives of your company.

Over 5,500 people have so far used the Countryside Alliance's e-lobby to make you aware of their concerns with this decision in the last week, and none of those concerns have been addressed in the standard letter that has been sent in response. In your business model it states that 'consultation with stakeholders forms an integral part of our planning process across the short, medium and long term' and yet we know of at least one shoot that was only informed by email, on the day the announcement was made, that it will be forced to close in 2024, having been running for over 30 years.

Both science and evidence are overwhelming in their support of game shooting and its associated management, and I would therefore be grateful if you could tell me the science and evidence that was used by United Utilities when reviewing the way in which it manages its land, and which led to the conclusion not to renew the shooting leases. Likewise, confirmation that you have undertaken a thorough assessment of the environmental, social, and economic consequences that would result from not renewing the leases. As I am sure you will be aware these are the three dimensions to the core of mainstream sustainability that have been identified by the International Union for Conservation of Nature, and all three need to be addressed by anyone looking at changing the status quo, with any change being at least as beneficial. There is no indication that any such assessment has been carried out before taking this dramatic step change in your approach 'to help ensure a fully resilient ecosystem in which wet moorlands and biodiverse woodlands can improve catchment resilience by slowing the flow of water and improving water quality and retention'. Far from delivering improvements and the objectives you identify, quite the opposite can be expected to result from the loss of shoots.

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Whilst United Utilities has claimed to be committed to working with others to accelerate the restoration and wetting of your peatlands and the biodiversity of your woodlands, no mention has been made as to who those others are, or where the funding will come from. It is the income from game shooting, whether in the uplands or lowlands, that has helped pay for the management undertaken, and without shooting that will cease. The management of heather is vital not just for the benefit of red grouse, but for many other species of ground nesting birds, and if left unmanage it becomes a severe fire risk. The careful management of heather is therefore essential as it helps preserve the carbon locked up in the underlying peat, and it helps prevent the outbreak of wildfires. Although the RSPB has publicly announced that it is against all burning of vegetation on peatlands, the most recent scientific research found that: heather burning can have a positive effect on carbon capture; burning does not cause water discolouration; environmentally important Sphagnum moss recovers quickly from low severity 'cool' burning; the loss of controlled burning in the USA led to declines in bird life and an increase in damaging wildfires; and greenhouse gas emissions from controlled burning are relatively insignificant compared to emissions from wildfire. The re-vegetation of bare peat and the blocking of drains to restore damaged peatland and encourage the growth of peat forming sphagnum moss which slows the flow of surface water and filters out discolouration will be tasks that others will need to undertake if shooting leases on your upland landholdings is stopped.

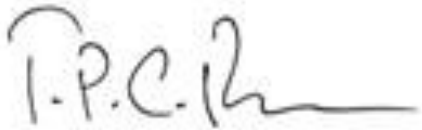
No explanation has been given as to how the decision not to renew shooting leases on your landholdings will conserve and improve biodiversity, including protected species, 'while also developing skills and jobs'. Game shooting is the largest contributor to conservation schemes in England and Wales, and it is an intrinsic part of the social fabric that connects rural communities together, whether it is in the uplands or lowlands. It provides people with jobs, and a network of small businesses with custom. Without shooting, wildlife, rare habitats, and already fragile communities will suffer. Gamekeepers will certainly suffer as they are left without employment, as will hen harriers and other threatened species of ground nesting bird.

A study carried out at Langholm between 1999 and 2006 by the Game & Wildlife Conservation Trust found that numbers of golden plover, curlew, red grouse, and skylark were two to three times lower than when the moor had been managed for grouse shooting, and that Lapwings had been virtually lost since keeping stopped. Hen Harrier numbers also went from a high of 20 in 1997, when the moor had been kept, to only 4 in 2006, due to increasing fox predation, and dwindling food supply. Of the 49 hen harrier nests in England last year, 18 were in the Forest of Bowland, 10 nests were across the Yorkshire Dales & Nidderdale region, and five were in the Peak District. Many of those were on land owned by United Utilities, and that success was largely due to the legal control of predators by gamekeepers. If shooting leases are not renewed, United Utilities will either need to employ others to undertake that essential management, or be held responsible for inevitable declines in the conservation status of the species.

Communities are listed as one of the stakeholders with whom you consult as an integral part of your planning, and yet we are not aware of any community within which affected shoots are located having been consulted prior to your announcement that shooting leases are not to be renewed. Shooting provides employment, not just to those that are employed on a full-time basis, but also all those that are employed casually on a shoot day whether it is as beaters, flankers, pickers up with their dogs, or loaders. It also benefits numerous rural businesses and has an important part to play socially. Shooting is all about communities, and yet this is something that United Utilities has ignored, despite claims to the contrary, in making its decision to stop all shooting on its landholdings.

It is hoped that you will take note of the very real concerns that have been raised by so many people following the announcement that game shooting is to be banned on land where you have the shooting rights, take account of all available science and evidence which is overwhelming in its support of game shooting and its associated management, and renew shooting leases as and when they come up for renewal. If that does not happen, then the consequences can be expected to be considerable not simply for wildlife and communities, but also in terms of water management.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'T.P.C.' followed by a stylized flourish.

Tim Bonner
Chief Executive