



Scottish
Environment

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Ms Roseanna Cunningham
Cabinet Secretary for the Environment, Climate Change and Land Reform
The Scottish Government
St Andrew's House
Regent Road
Edinburgh EH1 3DG

Dear Cabinet Secretary

Independently-led expert group on the environmental impact of grouse moor management

We are writing on behalf of the Scottish Environment LINK Hilltracks sub-group in respect of your recent announcement of a package of measures to be undertaken in response to an investigation into the suspicious deaths of golden eagles in Scotland.

Our members warmly welcome this initiative and in particular we strongly support the announcement that the government will be setting up an independently-led group to look at the environmental impact of grouse moor management practices. Our purpose in writing to you is to request that the scope of this study includes consideration of the very significant environmental damage and detrimental landscape impact caused by the construction of hill tracks. Many such tracks are closely related to the growing intensification of grouse moor management.

While tracks for agricultural or forestry purposes are built under permitted development rights, it was our contention in our 2013 [Track Changes](#) report that the main purpose for constructing many of these tracks was for use in grouse shooting or deer stalking activities.

In December 2014, following our earlier campaign, a measure of regulation was introduced, in that landowners who are constructing new hill tracks are now required to give prior notification to the planning authority. However, we are continuing to monitor the situation across the upland areas of Scotland (using a large team of volunteers and a consultant) to evaluate the success of this change to the legislation because it is our belief that many of our concerns have not been fully resolved through the prior notification process. From the evidence we have seen so far of the impact of the recent change, we continue to believe that full planning permission should be required for such tracks.

While we agree that some tracks are legitimately required for land management purposes, without full planning control we believe that much damage has occurred through poor siting and construction methods. This is continuing to occur despite the prior notification process. Such damage includes:

- serious and wide-reaching visual impacts, leading to the loss of visual and environmental amenity;
- damage to sensitive vegetation and soils, especially in upland environments;
- increased disturbance to wildlife;
- the destruction of, and consequent loss of stored carbon from, large areas of peatland;



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- initiation of erosion that often spreads over very large areas and causes silt run-off into waterways with adverse consequences for sensitive wildlife such as pearl mussels;
- damage to or destruction of geological and geomorphological features;
- devaluation of recreational opportunities;
- potential damage to tourism.

All of this can currently take place, legally, even in nationally protected sites such as National Parks and SSSIs.

We also think that many tracks are simply unnecessary and that moorlands could be managed and sporting activities could take place without them.

The Scientific Advisory Committee 2015 [report](#) into sustainable moorlands which was commissioned by Scottish Natural Heritage recognised there was a lack of evidence on the environmental impacts of hill tracks. We therefore believe that this new initiative provides an opportunity to gather such evidence and we urge you to include this within the scope of the study you have announced.

The LINK Hilltracks sub-group has built up a considerable case history portfolio which shows the detrimental visual impact of poorly constructed and maintained tracks and we would be grateful if you could advise the expert group that we can make this material available to them.

Thank you for your consideration of this matter.

Yours sincerely

Helen Todd and Beryl Leatherland
Co-conveners, LINK Hilltracks sub-group

The following organisations are members of the LINK hill tracks campaign group:

Association for the Protection of Rural Scotland
Badenoch & Strathspey Conservation Group
Cairngorms Campaign
North East Mountain Trust
National Trust for Scotland
Ramblers Scotland
RSPB Scotland
Scottish Campaign for National Parks
Scottish Wild Land Group

The campaign is also supported by the John Muir Trust and Mountaineering Scotland who are not LINK members.