Q1) Are you responding personally, or on behalf of an organisation?
- Personally
- On behalf of an organisation

Q2) Which of the following best describes your point of view?
- Business
- Conservation body or NGO
- Land manager/farmer
- Local government
- Local resident
- Member of a community group
- Statutory body
- Visitor to the area (live outside the National Landscape)

Q3) To what extent do you agree or disagree with the proposed vision for Forest of Bowland National Landscape? (see p.29 of the plan)
☑ Disagree

Q4) Additional comments on the vision:

Ambition acknowledged, but delivery pathway unclear
The Moorland Association recognises and supports the overarching ambition of the Vision: to conserve and enhance natural beauty, improve ecological resilience, restore peatlands, strengthen river systems, and ensure that the Forest of Bowland remains nationally regarded as an outstanding landscape.

However, support for high-level ambition does not equate to agreement with the implied delivery pathway. As currently drafted, the Vision risks presenting landscape recovery as something that will arise primarily through transition, restoration and expansion of semi-natural systems, without sufficiently recognising that the character, ecological function and public safety of Bowland are products of active, skilled land management.

Delivery realism and decision-usefulness
In line with evidence we submitted to the Public Accounts Committee on environmental regulation (namely fragmented governance, weak feedback loops, and insufficient testing of whether process delivers outcomes) we have focused our comments on delivery realism, accountability and decision-usefulness.

1. Bowland is a living, working landscape
The Forest of Bowland is not a static ecological reserve. It is a living, working landscape shaped over centuries by farming, grazing, moorland management and private stewardship. The wide-open moorland character, mosaic habitats, managed heather structure, predator control regimes and maintained access infrastructure are not accidental features; they are the result of sustained investment and expertise.

The Vision would be strengthened by explicitly recognising:
- The role of active land management in maintaining open moorland character.
- The contribution of private investment in sustaining peatland restoration, species monitoring, predator control and wildfire mitigation.

- The importance of economically viable land management systems to long-term ecological resilience.

Guarding against 'withdrawal by implication'
Without this clarity, there is a risk that "resilience" and "restoration" language is interpreted downstream as implying reduced intervention or management withdrawal. Evidence from unmanaged upland systems demonstrates that withdrawal can increase fuel loads, heighten wildfire exposure and reduce habitat condition in certain contexts. Resilience is not synonymous with absence of management.

2. Economic viability is a delivery prerequisite
The Vision correctly recognises partnership working and sustainable local economies. However, it does not clearly articulate that viable farming and moorland enterprises are foundational to delivering its ecological ambitions.

Where Vision language refers to transition, new economies or land use change, it should be accompanied by safeguards that:
- Do not pre-empt national policy development.
- Do not undermine lawful land uses.
- Recognise that removing income streams without secured alternatives risks reducing management capacity rather than enhancing nature recovery.

Transition should not be the implied direction of travel
The Plan should describe the baseline 'special qualities' more explicitly (recognising that SAC/SPA designations protect identified qualifying features and conservation objectives) and ensure any proposed 'transition' language is framed as *evidence-led, site-appropriate and non-presumptive*, rather than implying a default direction of travel.

Additionality and value-for-money
Much of the Plan's progress will, in practice, be driven by land managers, statutory agencies, utilities and NGOs operating through existing duties and funding streams. The Plan would therefore be strengthened by being explicit about the National Landscape team's *additionality* (ie. which outcomes depend on its convening role, project development capacity, match-funding leverage, conflict-resolution function, and monitoring/learning framework) and how this added value will be evidenced through outcome metrics (not activity metrics).

Avoiding a de facto "rewilding-by-default" pathway and unintended consequences
While we recognise the Plan's ambition for nature recovery and climate adaptation, the delivery pathway must remain management-neutral and evidence-led, not implicitly reliant on a "rewilding by default" model or the progressive withdrawal of active land management. If Plan wording is interpreted downstream as increasing the regulatory burden on routine lawful management (or signalling presumptions against it), there is a material risk of disincentivising private stewardship investment and reducing the on-the-ground capacity that currently supports habitat management, access upkeep and rapid wildfire response. This matters because upland resilience is not achieved by aspiration alone: fuel loads and access constraints are operational determinants of wildfire severity, and transitional vegetation change can increase exposure if not actively managed. The Plan should therefore make explicit: (i) that it does not introduce new tests or presumptions beyond existing statutory regimes, (ii) how it will safeguard and retain practical land-management capability, and (iii) how wildfire risk will be controlled during any transition in vegetation structure.

In addition, the Plan should avoid any implied assumption that reduced predator control will be outcome-neutral. For landscapes supporting red-listed ground-nesting birds, changes to predator management regimes can be a material pathway affecting breeding success. Where the Plan's direction could reasonably be read as encouraging reduced control in practice, it should either (a) set out an evidence-based alternative that delivers equivalent outcomes, or (b) commit to adaptive management with clear monitoring indicators and trigger points for review.

Skills and stewardship capacity (those who deliver)
The uplands' ecological condition is closely linked to the presence of skilled land managers on the ground. Any vision of 2040 that does not explicitly protect that capacity is incomplete.

Funding, sequencing and delivery capacity
While the Vision sets ambitious ecological and climate objectives, the draft Plan does not set out how these ambitions will be funded, sequenced or resourced over the lifetime of the Plan. The Climate Adaptation and Nature Recovery outcomes reference extensive peatland restoration, hydrological intervention, habitat expansion, water management and resilience measures. However, there is no accompanying cost modelling, funding pathway or delivery risk assessment. Without this, there is a risk that aspiration exceeds realistic delivery capacity.

Local land-management skills and capacity are a delivery prerequisite
The Plan's outcomes depend not only on funding and partnership structures, but on the continued availability of skilled people to deliver work on the ground. These are farmers, gamekeepers, shepherds, contractors, wallers, drainage and peatland teams, wildfire responders and estate staff. These skills and this capacity are a finite local resource. The Plan should therefore recognise the retention and support of this workforce as a delivery prerequisite, and avoid language or approaches that unintentionally undermine the people and businesses needed to implement habitat work, manage wildfire risk, maintain access and deliver nature recovery in practice.

The importance of practical and technical capacity is recognised in national scrutiny. The Public Accounts Committee concluded in 2021 that "Government needs to ensure that organisations have access to the skills and resources they require to play their part in delivering environmental goals," and noted the need for both "scientific and project management skills" in key delivery bodies. In a protected landscape context, the equivalent "delivery skills" include the finite local workforce that undertakes habitat management, species monitoring, access management and first-response wildfire action; Plan language should therefore explicitly protect and support that capacity as a delivery prerequisite.

The Office for Environmental Protection also underlines that outcomes often fall short not because the legal framework is lacking, but because delivery is not implemented effectively or at the pace and scale required. For Bowland, that translates into a practical requirement: plans, consents, procurement and workforce capacity must be aligned so that agreed measures can actually be delivered on the ground, rather than remaining aspirations. The Plan should therefore treat implementation capacity (skills, contractors, land-manager time, and operational response capability) as part of its core delivery logic, not as an assumed background condition.

Long-term maintenance, liability and "who owns the problem"
The Plan refers to new and improved infrastructure and land-management interventions (for example access routes, crossings, drainage/peat works, visitor facilities and wildfire-related measures). However, delivery does not end at installation. The Plan should therefore explicitly

require that any capital works or new infrastructure are accompanied by a clear long-term management position: who is responsible for inspection, upkeep and repair; who holds legal liability; what happens when grant periods end; and how ongoing costs will be funded. Without that clarity, there is a risk that long-term obligations are unintentionally externalised onto private land managers by default, which in turn can deter participation and undermine delivery.

Aligning major investment streams (FiPL/ELM, water company programmes)
The Plan should also recognise and align with major funding and investment streams already active (or emerging) in and around Bowland. For example, United Utilities' AMP programmes are supporting significant peatland and catchment restoration, and there is also the prospect of landscape-scale funding through schemes such as Landscape Recovery (including proposals affecting areas such as Claughton and parts of Bleasdale). These initiatives can be highly positive, but only if the Management Plan is explicit about how such funding will be coordinated, targeted, and evaluated alongside existing mechanisms (eg. FiPL and ELM), so that actions are not duplicated, delivery responsibilities are clear, and local land managers have confidence about the longevity and conditions of support.

By way of illustration, members are aware that United Utilities' next AMP period is expected to support a substantial programme of environmental works, including peatland restoration on the order of c. 1,400 acres across the North West. Members are also aware of a Landscape Recovery application affecting a limited part of the National Landscape (including Claughton and parts of the Bleasdale area), described at application stage as a 30-year programme with a headline funding envelope in the region of c. £200m (subject to negotiation, change and approval).

These figures are indicative and should not be treated as commitments. However, they underline the core point: significant money may be "in play", but outcomes will depend on coordination, conditions, governance, transparency and long-term maintenance funding. The Management Plan should therefore be explicit about how major investment streams will be aligned with FiPL/ELM and other mechanisms, how local delivery will be agreed with land managers, and how: who pays, who leads and who maintains, once capital works are complete.

Transparency on funding conditions ("no surprises")
The Plan highlights a range of delivery routes and funding mechanisms (including FiPL, ELM schemes, water-company programmes and other partnership funding). Where delivery is mediated through funding, there is a practical risk that criteria, guidance or advisory "expectations" can harden into de facto requirements over time - particularly if they are applied inconsistently or without clear labelling. The final Plan should therefore include a simple "no surprises" commitment: any material conditions, criteria or guidance used to shape eligibility, scoring or approvals should be clearly identified as such, published in accessible form, and kept under periodic review with land managers and delivery partners. This would strengthen confidence, improve consistency, and reduce the risk of unintended policy creep via funding mechanisms.

In particular, the Plan would benefit from clearer signposting or fuller coverage of:
- The scale of private investment currently underpinning upland stewardship.
- The economic consequences if existing income streams are weakened or destabilised.
- Whether alternative funding mechanisms are secured at sufficient scale and duration.
- The transitional funding required if management systems change.

It is important to recognise that many current conservation activities, including predator management, habitat monitoring, wildfire mitigation, wall maintenance and track upkeep, are funded

through private land management systems. If those systems are altered without secured financial replacement, management capacity may reduce before new funding streams are operational.

SEA/HRA: make screening conclusions easy to find
The consultation pack includes an HRA Report (Appendix 5), an SEA Screening Report (Appendix 4), and an SEA/HRA screening table (Appendix A). That is welcome, and it helps demonstrate that the Partnership is engaging with the relevant procedural requirements. However, to improve legal robustness and decision-usefulness, the Plan would be strengthened by:

1. **Making the screening conclusions explicit and easy to locate in the main Plan** (for example, a short boxed summary or signposted paragraph in the "how to use this plan / governance" material), including the headline conclusions and the status of consultation with the statutory bodies.
2. **Providing a clear, final screening statement** (HRA and SEA) that consolidates the outcome of consultation and confirms whether any consultation-driven changes have been made to the Plan and/or screening conclusions.
3. **Strengthening the "in-combination" transparency** by clearly signposting (in one place) the key plans/programmes considered and the reasoning for why likely significant effects are ruled out (or the safeguards/assumptions relied upon).
4. **Clarifying the boundary between strategic direction and site/project-level assessment**, i.e. confirming that the Management Plan does not pre-determine site-specific interventions and that relevant projects will still be subject to the appropriate statutory assessment and consenting routes.

This is not a procedural technicality. It is a matter of legal robustness and clarity for delivery partners and competent authorities relying on the Plan.

Wildfire and climate transition liability (roles during any transition)
In addition, wildfire and climate transition risks carry potential liability and insurance implications. Where changes in vegetation structure or hydrology may increase exposure to fire during transitional periods, clarity would be helpful on partner roles, resourcing for risk mitigation during transition, and arrangements for emergency response coordination.

Ambition must be matched by delivery realism. Clear recognition of financial and operational constraints will strengthen confidence that the Plan's objectives can be achieved without unintended ecological or safety consequences.

3. Wildfire as a core climate/public safety risk
The Vision rightly emphasises climate adaptation, carbon storage and peatland function. However, climate resilience in upland landscapes must explicitly include wildfire mitigation as a core risk, not an ancillary issue. Hotter, drier summers and longer drought periods are now established climate projections, and in upland environments fuel continuity and access constraints can translate directly into major public safety risks, large-scale habitat damage and loss of stored carbon.

A forward-looking Vision should therefore:

- **Recognise wildfire as a strategic climate risk** (with implications for peat carbon, biodiversity and public safety).
- **Acknowledge the role of proactive fuel management** and maintained access infrastructure in reducing fire severity and enabling safe suppression.

- **Avoid implying that management withdrawal automatically enhances resilience**, noting that structural uniformity and unmanaged fuel accumulation can increase risk in some contexts.

The Plan should commit to producing (or coordinating) a Bowland Fuel Load & Wildfire Operations Plan: mapping fuel continuity, identifying strategic breaks, confirming access/water points and setting maintenance responsibilities - so the risk identified in screening is matched by an on-the-ground control strategy.

A climate-resilient Bowland in 2040 must be one where ecological ambition and public safety are treated as complementary, not competing objectives.

Operational Infrastructure and Emergency Access

In addition to strategic wildfire recognition, the Vision would benefit from explicit acknowledgement of the operational infrastructure required to maintain safety and resilience across the upland landscape. The Forest of Bowland is geographically extensive, remote and in parts difficult to access. Effective management of wildfire, flooding, rescue incidents and habitat restoration depends upon maintained operational capacity, including:
- Land management access tracks.
- Bridges and culverts.
- Turning areas and emergency access points.
- Water storage points and fire ponds.
- Equipment storage facilities.
- Telecommunications infrastructure.
- Drainage and water management systems.

Operational access and safety-critical exemptions

The Plan contains aspirations to limit or avoid new track construction and other access infrastructure in order to protect landscape character. That principle is understandable. However, the Plan should also state explicitly that safety-critical and operational requirements must be treated differently. This includes wildfire response, emergency access, livestock welfare, legal land-management obligations, and essential maintenance of existing infrastructure. The Plan should therefore include a clear "operational exemption" to avoid blanket wording being interpreted as a presumption against necessary access improvements, particularly where these are required for public safety, emergency response, or the effective management of designated sites.

The features listed above are not incidental intrusions into landscape character; they are functional components of a safe and resilient working landscape. Where peatland rewetting, hydrological restoration or woodland expansion is proposed, the Plan should clarify how:
- Emergency vehicle access will be maintained across wetter terrain.
- Track maintenance and upgrade needs will be accommodated.
- Firefighting infrastructure will be preserved or enhanced.
- Temporary works during emergency response will be treated in planning contexts.

Without this clarity, there is a risk that landscape, geodiversity or restoration objectives could be interpreted downstream as constraining essential safety infrastructure. This would create tension between public safety obligations and environmental ambition. The Plan would therefore be strengthened by confirming that:
1. Operational infrastructure necessary for land management and emergency response is compatible with the conservation of natural beauty when sensitively designed.

2. Wildfire mitigation infrastructure is recognised as a landscape resilience asset.
3. Access and safety requirements will be addressed through site-specific, evidence-led decisions rather than blanket presumptions.
4. Land managers and emergency responders will be meaningfully involved in developing and maintaining wildfire preparedness and operational capacity.

4. Neutrality and Lawful Land Use
The Vision would benefit from clearer confirmation that it:
- Is non-statutory and does not create new regulatory tests.
- Does not pre-empt licensing regimes or national regulatory reform.
- Is management-neutral in tone and application.
- Treats lawful land managers as delivery partners, not obstacles.

Ambition must be grounded in evidence and proportionality. Non-statutory strategic language should not drift into implied policy commitments that exceed existing statutory frameworks.

Downstream Interpretation and Regulatory Use
The Association's concern is not with the stated intent of the Plan, but with how the published wording of it may reasonably be interpreted and relied upon by third parties in planning, regulatory and funding contexts. Management Plans are routinely cited by local planning authorities, statutory consultees, inspectors and objectors as material considerations. In practice, even non-statutory strategic language can acquire quasi-policy weight where its boundaries are not clearly defined.

It is therefore essential that the Plan:
- Explicitly confirms its non-statutory status.
- Does not introduce new policy thresholds or presumptions.
- Does not pre-empt national licensing or regulatory reform.
- Is not framed in a way that could reasonably be interpreted as establishing default restrictions on lawful land management.

Clarity at this level protects all delivery partners and reduces the risk of unintended regulatory drift.

In-Combination Effects and Plan-Level Legal Exposure
In addition to the absence of a clearly published Habitats Regulations Assessment (HRA) screening, the Plan does not adequately address potential *in-combination effects* with other plans and programmes operating across the same geography. The Forest of Bowland National Landscape overlaps with:
- Local Development Plans.
- Local Nature Recovery Strategies (LNRS).
- Peatland and water management strategies.
- Agri-environment and ELMS schemes.
- Emerging national policy reforms concerning peat, burning and species management.

Under the Habitats Regulations, the relevant test is not whether the Plan intends to benefit designated sites, but whether it is capable of influencing decisions in a way that may give rise to likely significant effects, either alone or in combination with other plans or projects.

Even where the Plan is described as "non-statutory," it may materially influence:
- Planning determinations under the strengthened Section 85 duty.
- Licensing decisions by competent authorities.

- Funding prioritisation and scheme eligibility.
- Interpretation of conservation objectives at site level.

The relevant legal question under the Habitats Regulations is not whether a Plan is formally binding, but whether it is capable of influencing future decision-making. Where a strategic document sets direction on peatland management, hydrology, woodland expansion or species management across landscapes containing SACs and SPAs, the threshold for screening is low.

Beneficial intent does not remove this requirement. A Plan designed to improve environmental outcomes may nevertheless give rise to likely significant effects, particularly where it alters baseline assumptions or signals directional change that competent authorities may rely upon in subsequent determinations.

In this context, transparency at plan level is essential. Clear screening and documentation of in-combination considerations would protect both the National Landscape Partnership and downstream public authorities from procedural vulnerability.

Where a strategic plan alters baseline assumptions regarding peatland management, hydrology, woodland expansion, predator management or habitat structure across a landscape containing SACs and SPAs, the potential for in-combination effects cannot reasonably be dismissed without formal screening.

The Plan would therefore be strengthened by:
1. Publishing a clear HRA screening statement addressing both direct and in-combination effects.
2. Explicitly identifying the other relevant plans and programmes considered.
3. Clarifying that beneficial intent does not remove the requirement for assessment.
4. Confirming that the Plan does not seek to pre-determine site-specific management outcomes that are subject to statutory assessment.

This is important for transparency, legal clarity and decision-usefulness for delivery partners and competent authorities who may later rely on the Plan. Failure to transparently address in-combination risk may expose the Plan to challenge or create uncertainty for public authorities relying upon it in subsequent decision-making. Clear, plan-level compliance will protect all delivery partners and strengthen confidence that environmental ambition is being pursued within a defensible statutory framework.

5. Constructive Recommendations
To improve clarity and confidence, the Vision could be strengthened by:
1. Explicitly describing Bowland as a "living, working landscape sustained through active land management."
2. Recognising the role of private stewardship and investment in delivering environmental outcomes.
3. Including reference to wildfire resilience as part of climate adaptation.
4. Confirming that the Management Plan does not create new regulatory thresholds or presumptions.
5. Emphasising adaptive, evidence-led management rather than prescriptive transition.

Conclusion

The Moorland Association supports the ambition to conserve and enhance the Forest of Bowland's natural beauty. However, we disagree with the Vision as drafted because it insufficiently recognises the central role of active, lawful and economically viable land management in delivering that ambition.

A 2040 Vision that is explicit about partnership, management neutrality, economic sustainability and climate resilience would command broader confidence and provide a more robust foundation for delivery.

We would welcome continued engagement to ensure the Vision reflects both ecological ambition and the practical realities of managing this nationally important landscape.

Governance, Accountability and Delivery Mechanisms
The Vision and Outcomes place strong emphasis on partnership working and collaborative delivery. The draft Plan contains welcome partnership intent, but would benefit from a short, clearly signposted explanation of how governance, decision-making and dispute resolution will operate in practice (including how different partner remits will be aligned).

Given the scale of proposed change across peatland management, hydrology, habitat expansion and climate adaptation, greater clarity is required regarding:
- How responsibilities will be divided between the National Landscape team, Natural England, the Environment Agency, local planning authorities and other public bodies.
- How differences of interpretation between delivery partners will be resolved.
- What mechanisms exist to prevent duplication, inconsistency or informal policy drift.

In particular, the Management Plan should clearly state:
1. That it does not create new decision-making powers or regulatory thresholds.
2. That it does not alter or expand the statutory roles of Natural England or other competent authorities.
3. That where interpretation disputes arise, formal governance routes will be used rather than informal expectation-setting.

The strengthened Section 85 duty requires public authorities to exercise judgement; it does not convert Management Plans into binding policy instruments nor justify blanket presumptions against lawful activity. The duty must be applied alongside existing statutory frameworks, adopted development plans and principles of proportionality.

Guarding against misapplication of the Section 85 duty
The Plan should make clear that Section 85 is a duty on public authorities to exercise judgement case-by-case; it does not convert Management Plans into binding policy instruments, nor does it justify blanket restrictions on lawful activity. Decisions must continue to be taken through the relevant statutory processes, based on evidence, proportionality and local context, and in a manner that respects established rights and duties.

Regulatory creep: how it happens (and why it matters here)
The Association notes that regulatory creep rarely arises through formal legislative change. More commonly, it occurs incrementally, where aspirational statements are treated as benchmarks, benchmarks become expectations, and expectations are then applied as if they were policy requirements. To prevent this, the Plan should clearly distinguish between:
- Strategic aspiration,
- Partnership objectives,

- Good practice guidance, and
- Statutory requirements.

Avoiding default restrictions through "guidance creep".
The Association supports clear outcomes and high environmental ambition, but cautions against a pattern in which broad statements are later treated as presumptions against lawful activity. To avoid this, the Plan should be explicit that restrictions are not the default position. If constraints beyond existing legal requirements are proposed or inferred, they should be justified by (i) a clear statement of the decision-context in which they apply, (ii) site-specific evidence of likely significant adverse effects, and (iii) an explanation of why the proposed approach is proportionate and the least-restrictive means of achieving the stated outcome.

Without this separation, there is a material risk that the Plan could unintentionally narrow the scope of lawful land management through interpretation rather than legislation. A clear governance statement within the Plan would strengthen confidence and reduce the likelihood of conflict or misapplication in future decision-making.

The absence of explicit governance safeguards risks creating uncertainty for land managers who may otherwise face inconsistent signals from different bodies referencing the Plan.

Regulatory creep rarely arises through formal legislative change. More commonly, it develops incrementally, where aspirational language is treated as a benchmark, benchmarks become informal expectations, and those expectations are subsequently applied as if they were policy requirements.

Make governance explicit: separate ambition, guidance and statutory duty
In the context of a National Landscape Management Plan, this risk is heightened where strategic ambition is not clearly distinguished from statutory obligation. Even where the Plan is described as non-statutory, ambiguity in wording can allow it to acquire unintended quasi-policy weight in planning, licensing or funding contexts. To prevent this, the Plan should clearly differentiate between:
- Strategic ambition
- Partnership objectives
- Good practice guidance
- Statutory requirements

Clear separation between these categories would strengthen governance clarity, reduce the risk of misapplication, and support constructive partnership delivery over the life of the Plan.

Recommendation: add a Governance and Implementation section
The Association therefore recommends that a short Governance and Implementation section be added to the Plan, clarifying:
- The advisory (non-regulatory) status of the Plan.
- The limits of its influence in planning, licensing and funding decisions.
- The mechanisms for review and amendment if unintended consequences arise.
- The process for resolving inter-agency conflict where objectives appear to compete (for example, conservation objectives and public safety obligations).

Clarity at this stage will strengthen the Plan, reduce the risk of regulatory creep, and reinforce confidence that partnership delivery will operate within defined and lawful parameters.

From 'pressure' to programme: gull/seabird impact reduction plan

To make this deliverable and measurable, the Plan should include a commitment to produce a Bowland Seabird Impact Reduction Plan (or similarly titled action plan) within 12 months of adoption, setting out:

- a baseline (agreed monitoring of gull abundance/distribution and wader productivity in priority areas)
- a clear diagnosis of drivers (including food availability pathways such as landfill/waste, agricultural sources and visitor-related feeding)
- a coordinated package of responses aligned to legal duties and licensing requirements (eg. prevention, waste/food controls, targeted non-lethal measures and any licensed interventions, and
- named leads, partner roles, funding route(s), review points and success measures (eg. productivity targets for curlew/lapwing in priority clusters).

This would move the issue from general acknowledgement to an accountable programme of work, giving land managers and delivery partners clarity on what will happen, who will lead it, and how effectiveness will be judged.

Q5) This Management Plan is built on a set of core principles which provide a framework to guide policy and practice in Bowland. Accepting these principles is essential to adopting and delivering the plan. Do you think we have identified all the relevant principles? (see p.29 of the plan)

☑ No

Q6) If you answered "No", please list any principles you think are missing, or provide suggestions for improving or clarifying the principles?

Why principles need safeguards (avoid drift into extra 'tests')

The Moorland Association considers the Core Principles well-intentioned, but incomplete. As drafted, they do not yet provide sufficient clarity or safeguards to support consistent downstream interpretation and practical delivery in a living, working landscape. In particular, the principles should do more to: (i) prevent unintended regulatory drift; (ii) recognise the delivery role of economically viable, skilled land management; and (iii) ensure "partnership" is defined in operational, not just rhetorical, terms.

Avoiding undefined qualifiers becoming de facto policy

Across the Plan, avoid creating new, undefined qualifiers that can be misused as additional decision tests beyond law; where the legal threshold is 'lawful', the Plan should not add subjective, un-defined overlays.

Good-practice benchmark (IUCN Green List as a reference point)

We recommend the following additions/clarifications. To help ensure these Core Principles are interpreted consistently and remain focused on delivery, the Plan could usefully reflect widely recognised protected-area good practice benchmarks such as the IUCN Green List (which emphasises good governance, sound planning, effective management, and demonstrable outcomes). We are not suggesting an accreditation exercise here; rather, the point is that Bowland's principles should clearly support accountable partnership governance, evidence-led decision-making, adaptive management, and outcome monitoring - so that "principles" strengthen delivery rather than becoming informal extra policy tests.

1) Management-neutral, working-landscape principle
Add an explicit statement that the Plan is management-neutral: it does not pre-judge lawful land uses as undesirable and does not assume reduced intervention or "management withdrawal" as a default route to improvement. Enhancement should be evidence-led and site-specific, and should recognise Bowland as a living, working landscape shaped by lawful farming, grazing, moorland management and estate stewardship.

2) Evidence and proportionality principle
Add a principle that actions and priorities must be evidence-led and proportionate, with precaution used appropriately but not as a substitute for analysis. Where change is proposed, the evidential threshold should be clear and applied consistently.

3) Economic viability and stewardship capacity principle
Add an explicit delivery principle recognising that long-term outcomes depend upon economically viable land management and the retention of skilled people on the ground. Without stewardship capacity, ambition cannot translate into durable outcomes.

4) Public safety and resilience principle (including wildfire risk)
Clarify that climate resilience must include public safety risk management, including wildfire exposure, fuel continuity, and the operational requirements for emergency response (eg. maintained access and practical incident-response capacity).

5) Non-statutory status and regulatory clarity principle (guarding against policy drift)
Because the consultation states acceptance of the principles is "essential" to adopting the Plan, the principles should explicitly confirm:
- the Plan's non-statutory status
- that it does not create new policy tests, presumptions or thresholds, and
- that it does not pre-empt national policy development, consultations, or licensing regimes.

This safeguard is necessary to reduce the risk of incremental "regulatory creep", where aspirational language is treated as a benchmark and then applied as if it were policy.

This risk is not hypothetical. Members have seen situations where a proven, locally delivered intervention has been halted primarily on procedural grounds, even where real-world outcomes were improving. By way of example, the Association has documented a case where a multi-year trial delivered measurable success in species recovery and conflict reduction, but was subsequently discontinued following the introduction of new conditions that were judged impractical and costly to meet - so the programme stopped despite on-the-ground results.

The lesson for this Management Plan is straightforward: strategic wording must not become a substitute for lawful, outcome-focused judgement, and governance must guard against a drift toward process compliance and informal benchmarks that can inadvertently block practical delivery.

6) Adaptive management and review principle
Add a principle committing to adaptive delivery: monitoring, transparent review points, and willingness to amend approaches if interventions do not deliver intended outcomes or create unintended consequences.

7) Partnership realism principle (recognising delivery partners)
Strengthen "partnership" by explicitly recognising the role of those who deliver practical land

management on the ground. The Plan repeatedly refers to "meaningful partnerships", yet it omits gamekeepers/keepering entirely, despite their role in monitoring, day-to-day management capacity and (where lawful) predator management and incident response. A partnership principle should reflect this delivery reality if it is to be meaningful in practice. The Plan should therefore commit to actively involving gamekeepers (and estates that employ them) in wader recovery design, monitoring and delivery discussions, alongside other partners.

Meaningful engagement, co-design and accessibility

The draft Plan repeatedly recognises that most outcomes can only be delivered through the cooperation of those managing and working the land. Where delivery is so dependent on consent, capacity and long-term commitment, engagement that is primarily "consultation on a finished draft" is less effective than structured co-design at an earlier stage. We therefore query why many operational land managers appear to be being engaged primarily at this late stage, when the draft Plan is already lengthy and technically dense. With a document set running to around 191 pages, the burden placed on those expected to help deliver outcomes is significant within the available consultation timeframe. This risks unintentionally skewing participation toward organisations with dedicated staff capacity, rather than those managing land day-to-day.

We therefore encourage the team to complement the formal consultation with targeted engagement sessions and a clear "land manager summary" (eg. a 10-15 page plain-English digest setting out: what is proposed, what is optional guidance, what is statutory, who leads delivery, and what this means in practice for different land uses). This would improve practicality, strengthen ownership, and reduce implementation risk.

Consultation fairness and equal ability to participate

We also encourage the team to recognise that consultation accessibility is not only about producing a summary; it is about ensuring different groups have an equal practical ability to take part. A long, technically dense document set within a limited timeframe can unintentionally disadvantage those who are time-poor, digitally excluded, older, or who work primarily outdoors and cannot readily attend daytime meetings or undertake extensive desk-based review. The final Plan should therefore commit to proportionate, accessible engagement alongside the formal consultation -using a short plain-English summary, flexible session times/locations, and clear routes for practical, on-the-ground feedback. This should help ensure responses better reflect those expected to deliver outcomes as well as those who comment professionally.

Resourcing participation (fairness and delivery capacity)

If land managers are expected to contribute meaningfully to Partnership governance (attending meetings, reviewing evidence, shaping delivery plans and being accountable for outcomes) this cannot be treated as unpaid stakeholder engagement. In practice, unpaid participation systematically favours organisations whose involvement is institutionally funded, while excluding those with day-to-day operational responsibilities. The Plan should therefore commit to modest but formal resourcing for land manager participation in core delivery and governance structures (eg. expense cover and time allowances for agreed roles), so that partnership is balanced, sustained and genuinely representative of those expected to deliver outcomes on the ground.

Partnership working in practice

Working in partnership is not an abstract point. Evidence from local curlew work (including an RSPB radio-tagging trial) has highlighted the practical consequences of reduced on-the-ground gamekeepering capacity on some holdings, including areas where sporting leases have ceased and gamekeepering effort has fallen. Where such reports explicitly identify loss of leases/keepering input

as a factor affecting outcomes, the Management Plan should acknowledge this delivery reality and respond accordingly: wader recovery measures must be designed around the resources and people that actually implement habitat and predator management on the ground, rather than assuming capacity exists regardless of land-use economics.

A standing mechanism for resolving land-use and species conflicts (with triggers)
The Plan recognises that delivery will involve trade-offs and, at times, competing objectives (for example between visitor pressure, wildfire risk, grazing, predator–prey dynamics, and the condition of priority habitats and species). To make the partnership approach workable, the final Plan should commit to a standing, transparent conflict-resolution mechanism for those situations. This should include: a named lead/convener, agreed evidence sources and monitoring, clear trigger points for review where outcomes are not being met, and an agreed process for adapting management approaches. Without that structure, difficult issues risk being deferred, polarised, or handled inconsistently, which undermines confidence and slows delivery.

This is not simply a socio-economic concern. It is an ecological dependency. In practice, the delivery of the Plan's priority species outcomes (including curlew and other breeding waders) often relies on consistent on-the-ground management capacity. This involves people present daily to undertake predator control, habitat work, rapid response to emerging pressures, and routine upkeep of agreed measures. Where that capacity is removed or materially reduced, the Plan should acknowledge that risk to outcomes increases and that compensatory delivery arrangements would be required if the same ecological ambitions are to remain credible.

8) Evidence-led wildlife conflict resolution principle (hen harrier delivery clarity)
Where the Plan aspires to outcomes that involve recognised wildlife conflict (for example hen harrier recovery), the principles should commit to evidence-led conflict resolution and delivery clarity, rather than relying on undefined "local management approaches". This should include explicit commitment to using proven, monitored interventions where appropriate, and to working constructively with the land management systems currently associated with successful breeding distribution.

Conclusion
These additions would strengthen governance clarity, reduce the risk of misinterpretation, and provide a more credible framework for delivery. They would support the Plan's ambition while keeping it lawful, practical and partnership-based.

Q7) To what extent do you agree with the outcomes for Landscape (see p.33):
☑ Disagree

Q8) Please add any further comments about the outcomes for Landscape:

Landscape outcomes: support purpose, but framing is incomplete
The Moorland Association supports the statutory purpose of conserving and enhancing the natural beauty of the Forest of Bowland. We recognise that landscape character, tranquillity, openness and cultural heritage are central to the area's designation.

However, we disagree with the Landscape Outcomes as currently framed because they do not sufficiently acknowledge that Bowland's landscape is the product of active, skilled and economically viable land management. Without that recognition, the Outcomes risk being interpreted as favouring

landscape change through management withdrawal or uniform prescription rather than through partnership and stewardship.

1. Landscape character is a managed condition
The open moorland, enclosed moorland hills, drystone wall networks and managed heather mosaics are not passive ecological states. They are maintained through:
- Grazing regimes
- Heather and vegetation management
- Predator control
- Track and access maintenance
- Water management interventions

The Landscape Outcomes should explicitly state that conserving landscape character includes maintaining the management systems that created and sustain that character. This is consistent with the Plan's own acknowledgement that Bowland's uplands are working landscapes, used for livestock farming alongside moorland management for grouse shooting.

Recognition of driven grouse shooting's conservation delivery
The Plan should also be explicit that, in the UK uplands, the integrated moorland management system associated with driven grouse shooting is widely evidenced as a major long-term mechanism for maintaining heather moorland habitats and delivering conservation outcomes at scale, underpinned by substantial private investment and skilled gamekeeping. Whatever future policy direction is pursued, it is striking that this established conservation delivery model is not expressly acknowledged in the Plan's baseline narrative, given the evidence summarised in Simon Denny (2023) and the role that managed grouse moors play in the geography and management of designated upland habitats and species.

Need for an economic and delivery assessment
Given the Plan's implied direction of travel on upland land management, it should include a proportionate economic and delivery assessment of the likely impacts of proposed changes on the viability of existing management systems and the private investment that currently underpins them (including gamekeeping capacity and routine habitat work). There is little value in policy signals that make moorland management economically marginal or unviable if the predictable consequence is reduced management intensity, declining habitat condition, and an unfunded requirement for public bodies to replace lost private delivery in order to meet conservation objectives.

2. "Working with land managers" should be treated as a core opportunity, not an afterthought
The Plan's Landscape section sets out pressures and opportunities (including development/recreation pressures and the need for sensitive management at visitor sites). But the framing across pages 33 to 38 would be materially strengthened if it more clearly treated working with land managers and enhancing what already exists as a central delivery opportunity (not merely a stakeholder "input"). Measures already depend on land managers (eg. walls, grazing, invasive species control, maintaining moorland vegetation mix).

3. Avoiding implied presumptions against lawful management
The Outcomes would benefit from explicit confirmation that:
- Lawful land management is not presumed to be a pressure.
- "Enhancement" does not equate to abandonment.

- Infrastructure necessary for land management and safety is compatible with landscape conservation when sensitively designed.

Experience in other protected landscapes shows that strategic language can later be relied upon by third parties in planning or regulatory contexts. The Management Plan should therefore make clear that it does not establish new thresholds or presumptions against established land uses.

4. Climate resilience must explicitly include wildfire risk and operational capacity

The Landscape Outcomes appropriately reference climate resilience, but climate adaptation in upland landscapes must explicitly include wildfire risk. The Climate Adaptation Plan for Bowland itself recognises increased wildfire risk as a key impact.

In practice, resilience depends on operational measures and people on the ground, including:
- Fuel load management and strategic fire breaks (where appropriate)
- Access tracks and emergency access routes
- Emergency water points
- Rapid local reporting and first response

The Plan should be explicit about the practical role that moorland managers and gamekeepers already play in wildfire prevention and response, including supporting Fire & Rescue Services when incidents occur, and in discouraging risky behaviour (and encouraging safe behaviour) among visitors.

5. Recreation pressures: acknowledge the full range of impacts and the role of keepers in mitigation

The Plan identifies visitor pressures such as erosion, disturbance, litter, parking and conflict between recreation types. However, it does not clearly address a major, predictable source of seasonal pressure: unmanaged dog walking during the bird breeding season, including disturbance of ground-nesting birds.

The Plan should also recognise the substantial day-to-day work undertaken by gamekeepers and land staff to manage these issues on the ground - asking people to keep dogs on leads, avoid sensitive nesting areas, and helping prevent and respond to ignitions during high-risk periods.

6. Bracken and gorse: treat control as a local opportunity, not just a "pressure"

The Plan recognises invasive species control and grazing management as part of Landscape delivery. Where bracken and gorse expansion is identified as a pressure (and where reductions in grazing and/or herbicide options constrain management), the Plan should explicitly allow for locally-tailored responses, including targeted increases in stocking density where appropriate and sustainable, as part of an adaptive toolkit—rather than implying there is only one direction of travel.

7. Skills and stewardship capacity: explicitly recognise shepherding and gamekeeping as essential "landscape skills"

If the Plan is concerned about the loss of traditional skills, it should explicitly recognise the importance of maintaining and renewing the practical skills base that underpins delivery (particularly shepherding and gamekeeping) because these are core capabilities for:
- Habitat and vegetation management
- Access management and visitor liaison
- Species monitoring
- Wildfire prevention and first response
- Maintaining landscape features and infrastructure

8. Economic realism and private investment

The Plan acknowledges that private finance and investment can support habitat restoration and management. The Landscape Outcomes should be careful not to frame lawful rural enterprises only as "pressures". Where activities generate private income (including sporting-related income streams), they can also provide the financial basis to support conservation delivery and reduce

reliance on the public purse. A more balanced framing would strengthen partnership and delivery confidence.

Constructive recommendations (to incorporate within the Landscape Outcomes)
To improve clarity and delivery confidence, we recommend that the Landscape Outcomes:
1. Explicitly describe Bowland as a living, working landscape whose character depends on active management.
2. Treat "working with land managers to enhance what we already have" as a primary opportunity in the Forces for Change narrative, reflecting the delivery reality of the Measures.
3. Strengthen the link between climate resilience and wildfire preparedness, explicitly recognising on-the-ground operational measures and capacity.
4. Expand recreation pressures to include seasonal disturbance (including dog impacts in the breeding season) and recognise the role of land staff and keepers in mitigation.
5. Ensure invasive species and vegetation pressures (eg bracken/gorse) are addressed through adaptive, locally-tailored toolkits (including grazing where appropriate), consistent with proportionality and evidence-led delivery.
6. Explicitly recognise the importance of sustaining traditional skills and stewardship capacity (including shepherding and gamekeeping) as a practical prerequisite for delivery.

Q9) To what extent do you agree with the outcomes for Nature Recovery (see p.39):
☑ Disagree

Q10) Please add any further comments about the outcomes for Nature Recovery:
The Moorland Association supports the objective of reversing species decline, restoring peatland function, improving water quality and strengthening habitat resilience. We recognise that these ambitions align with national statutory targets and the designation purpose of the National Landscape.

However, we disagree with the Nature Recovery Outcomes as currently framed because they risk presenting recovery as something that will arise primarily through management restriction or "transition", rather than through active, evidence-led land stewardship. The Outcomes do not sufficiently recognise that many of Bowland's most valued habitats and species are dependent upon ongoing, skilled management - and that delivery will be impossible without farmers, landowners, gamekeepers and estate staff.

We support peatland restoration where evidence supports it, but the Plan should avoid allowing "peatlands" to become a proxy for the wider "moorland" system. Moorland in Bowland is a mosaic habitat and managed landscape, and delivery requires a broader framework than peat hydrology alone (including heather condition, wildfire/fuel management, grazing balance, access and priority species outcomes). The Plan would benefit from clearer, dedicated moorland/heather moorland sections so peatland objectives sit within a complete moorland management framework.

Black grouse delivery realism – habitat is necessary but not sufficient
Over-simplified success pathway (habitat-only framing): The draft Plan implies that black grouse recovery is principally a function of habitat enhancement. That framing is not evidence-led and risks setting the Plan up to fail, because black grouse outcomes are typically determined by a package of factors, including (among others) predation pressure, disturbance, weather-driven productivity, connectivity to source populations, and the practicality of sustained land management on the ground.

Habitat improvement is necessary, but it is not sufficient on its own. The Plan should therefore avoid implying a single-cause pathway and instead specify the full delivery conditions required for black grouse recovery (and how they will be achieved, funded, and monitored).

RSPB Geltsdale acknowledge the benefit of neighbouring grouse moors to the black grouse and other ground nesting populations there. The wider evidence reviews discuss links between these populations and predator control regimes associated with grouse moor management. The Plan should acknowledge this reality and avoid implying that habitat works in isolation drive outcomes.

We offer the following constructive comments and recommendations.

1. Nature recovery must be delivery-focused and management-capable

Bowland's upland habitats (blanket bog, heather moorland, rough grazing and species-rich grasslands) are managed systems. Their structure, function and species performance are shaped by practical interventions including grazing regimes, heather management, hydrological work, access and emergency infrastructure, and predator management.

The Outcomes should therefore be explicit that:
- Lawful management systems are not presumed to be obstacles to recovery.
- Recovery pathways will be site-specific, evidence-led and adaptive (with monitoring and review).
- Withdrawal of management is not treated as the default "improvement" mechanism.

There is a material difference between improving management and removing management, and the Outcomes should reflect that distinction.

2. Heather moorland: the Plan should include a dedicated section

Given the scale and significance of heather moorland across the Forest of Bowland, the Nature Recovery Outcomes would benefit from a dedicated section on heather moorland management. Heather moorland is repeatedly identified in the draft Plan and supporting material as a defining habitat for Bowland's character and for internationally important upland bird populations.

At present, heather moorland is referenced frequently but largely as background context, without a clear, structured statement of:
- its importance to landscape character and SPA interests
- the principal pressures (eg. wildfire exposure, heather beetle, erosion and recreation disturbance), and
- the practical management toolkit and partnership delivery approach required to sustain it.

A dedicated section would improve clarity, reduce scope for misinterpretation, and align the Plan's structure with Bowland's core habitat. It would also provide an appropriate place to link climate adaptation risks (including wildfire and heather beetle) with practical, on-the-ground management capacity and delivery mechanisms.

3. The Plan itself acknowledges reliance on farmers and land managers, so this must be carried through into outcomes and measures

The draft Plan correctly states that farmers and land managers will play the central role in conserving and enhancing nature in Bowland, at a time of significant uncertainty and change. Given that dependency, it is striking that the Nature Recovery Outcomes do not more clearly set out:
- how the Plan will retain and support the people and skills needed to deliver it, and

- what practical steps will be taken to maintain land management capability (including estate-based capacity) across the Plan period.

If the loss of farming/keeper capacity is identified as a risk in the "pressures" narrative, the Plan should also include explicit "opportunities" and measures to address it (for example: targeted support for skills retention, succession, training pathways, and practical engagement to identify what would keep people on the land).

4. Predator control: we welcome inclusion, but the wording risks being unhelpfully ambiguous

We welcome that the draft Plan includes a measure to "undertake legal, proportionate and responsible predator control" to benefit species such as curlew, golden plover, hen harrier and merlin. However, the phrase "legal, proportionate and responsible" is (a) potentially subjective and (b) capable of being interpreted as a narrowing test beyond existing law. "Legal" already provides the clear threshold; adding additional undefined qualifiers can create avoidable dispute and uncertainty for those delivering outcomes.

We recommend replacing this wording with something clearer and more decision-useful, such as "Support lawful, evidence-led predator management, delivered to improve breeding success of vulnerable ground-nesting species, with monitoring and adaptive review." This approach keeps the Plan outcome-focused and reduces the risk of future misinterpretation.

Outcome focused

The case for tighter, outcome-focused drafting aligns with current regulatory reform thinking. The 2025 Corry Review argues the system should be "focused on delivering positive outcomes for nature and the environment" and should not become "stifling red tape," while still operating with "predictability and consistency" and enough discretion to do "common-sense" things in the right place. It specifically advocates "focus on outcomes, scale and proportionality." Translating that into this Plan means preferring measurable, evidence-led outcomes and adaptive review triggers, rather than adding subjective qualifiers that may generate avoidable dispute or uncertainty for those delivering the outcomes.

5. Pressures identified, but delivery responses are missing

The Plan identifies pressures such as increased gull numbers and pest/disease impacts (including heather beetle), but it is not always clear what the Plan will *do* in response, and how this will be delivered on the ground.

In particular, the Plan should treat increased gull numbers as a specific, cross-cutting delivery issue (not just a "pressure" statement). Gull predation can materially affect breeding success for ground-nesting birds, and the drivers are often beyond individual holdings (eg. waste/food sources, settlement-edge roosting and nesting, and wider population dynamics). The Plan should therefore commit to a coordinated local approach with land managers, local authorities and relevant agencies: (i) monitoring and mapping hotspots, (ii) identifying and addressing controllable drivers (especially food availability/waste pathways where relevant), and (iii) agreeing proportionate, on-site interventions where evidence shows persistent impacts on priority species, with clear roles, funding responsibility and review.

Where pressures are well-recognised and recurrent, the Plan should include at least one of the following:

- a commitment to develop and publish an agreed local response plan (with partners and land managers). For example, a Bowland gull management/impact-reduction plan where monitoring identifies hotspots
- defined monitoring and trigger points for action, and
- clarity on roles (who leads, who funds, who delivers).

Without this, the Outcomes risk reading as aspirations rather than an implementable programme.

6. Roles, delivery and review (make it testable)
To strengthen confidence and align partners behind delivery, we recommend the Nature Recovery section includes:
1. explicit recognition of land managers as delivery partners (not simply stakeholders),
2. a stronger link between outcomes and practical delivery mechanisms,
3. a commitment to monitoring and adaptive management (including review where unintended consequences arise), and
4. clearer lines on how the Plan will sustain the management capacity it depends on.

Conclusion
The Moorland Association supports meaningful nature recovery in the Forest of Bowland, but the Outcomes would be strengthened by clearer recognition that recovery depends on practical, skilled land management and the people who deliver it. With tighter wording on delivery, greater clarity on sustaining land management capacity, and more explicit responses to identified pressures, the Nature Recovery framework could command broader confidence and provide a more robust pathway to shared environmental goals.

Q11) To what extent do you agree with the outcomes for People (see p.57):
☑ Neutral

Q12) Please add any further comments about the outcomes for People:

People outcomes: supportive intent, but working reality needs explicit recognition
The Moorland Association supports the broad intention behind the People Outcomes. These include that the Forest of Bowland should be a place where communities thrive, public understanding increases, access is responsible, and the landscape contributes to wellbeing, education and economic opportunity.

However, while the direction is positive, the Outcomes would benefit from clearer recognition that the Forest of Bowland is not simply a recreational or experiential landscape. It is a managed, working environment in which landowners, farmers and estate staff live and operate daily. Public access and community benefit must therefore be balanced with operational reality, public safety and economic viability. Our comments are set out below.

1. Recognising the Role of Land Managers as Community Stakeholders
The People Outcomes rightly refer to community engagement and inclusive access. However, they should explicitly recognise that:
- Farmers, estate workers and land managers are part of the resident community.
- Rural employment linked to land management is a social outcome in its own right.
- Stewardship capacity underpins the visitor experience.

The upland workforce provides infrastructure maintenance, emergency response, wildlife monitoring, and day-to-day oversight. A People framework that overlooks this risks unintentionally weakening the very human capital that sustains the landscape.

2. Responsible Access and Public Safety

The Management Plan emphasises access and enjoyment. We support responsible access that enhances understanding and wellbeing. However, the Outcomes should explicitly include:

- The importance of biosecurity (livestock disease, wildlife disease).
- The risks associated with wildfire ignition from recreational activity.
- The need for clear messaging around responsible behaviour.
- Recognition of operational constraints during sensitive periods (eg. lambing, ground-nesting bird breeding season, wildfire risk conditions).

Increased visitor numbers without proportional emphasis on responsibility can generate environmental and safety pressures. The Plan should balance access promotion with strong commitments to behaviour management and risk mitigation.

3. Infrastructure and Operational Needs

Public enjoyment depends upon maintained infrastructure, including:

- Access tracks
- Parking areas
- Signage
- Emergency access routes
- Drainage systems

These features also support land management and emergency response. The People Outcomes should make clear that:

- Infrastructure necessary for safety and management is compatible with National Landscape purposes.
- Operational access should not be framed as visual intrusion by default.
- Emergency preparedness (particularly for wildfire) is part of community wellbeing.

4. Economic Contribution of Land-Based Activity

The People Outcomes emphasise local economic vitality, tourism and sustainable enterprise. This is welcome. However, the Plan should explicitly recognise:

- The contribution of agriculture and estate-based management to rural employment.
- The economic multiplier effect of land-based activities.
- The role of private investment in sustaining conservation delivery.

If economic viability declines, local employment and community resilience decline alongside it. Nature recovery and rural livelihoods are interdependent.

5. Avoiding Regulatory Creep Through Social Framing

There is a risk that People Outcomes, if loosely framed, may later be interpreted as justification for:

- Increased informal scrutiny of lawful activities.
- Social pressure to curtail traditional land uses.
- Indirect regulatory expansion via "public interest" arguments.

The Plan should therefore reaffirm:

- Its non-statutory status.

- That it does not create new obligations.
- That lawful land uses remain legitimate components of the landscape.

Clarity reduces conflict and strengthens partnership.

6. Education and Narrative Balance
We support education and interpretation initiatives. However, interpretive material should:
- Present a balanced account of landscape history.
- Recognise farming and moorland management as formative influences.
- Avoid portraying active management systems as historical artefacts or problems to be corrected.

Public understanding is strengthened when complexity is acknowledged rather than simplified.

7. Constructive Recommendations
To strengthen the People Outcomes, we recommend:
1. Explicit recognition of land managers as core community stakeholders.
2. Stronger reference to public safety and wildfire risk in access promotion.
3. Clear affirmation that necessary infrastructure supports both community and conservation.
4. Balanced educational narratives that reflect working landscape realities.
5. Reaffirmation of non-statutory status and limits.

Conclusion
The Moorland Association is broadly supportive of the direction of the People Outcomes but remains neutral overall because key safeguards and recognitions are not yet sufficiently explicit. With clearer emphasis on responsible access, stewardship capacity, economic resilience and regulatory clarity, the People framework could provide a strong foundation for collaboration. We remain committed to working constructively to ensure that Bowland continues to be a place where people live, work and enjoy the landscape safely and sustainably.

Q13) To what extent do you agree with the outcomes for Place (see p.67):
☑ Neutral

Q14) Please add any further comments about the outcomes for Place:

Place outcomes: broadly supportive, but safeguards needed
The Moorland Association recognises that the Place Outcomes seek to strengthen the distinct identity of the Forest of Bowland, support vibrant rural communities, safeguard cultural heritage and ensure that development and infrastructure reflect landscape character. We broadly support those ambitions. However, we remain neutral overall because the Outcomes would benefit from clearer safeguards regarding economic viability, operational infrastructure, regulatory clarity and the treatment of working land uses within the concept of "place". Our comments are set out below.

1. Place as a Working Landscape, Not a Static Setting
The Forest of Bowland's identity is inseparable from:
- Farming and grazing systems
- Moorland management
- Estate stewardship
- Rural employment

- Managed access infrastructure

Place is not simply about aesthetic character or visitor perception; it is about the lived and managed reality of rural communities.

The Outcomes would be strengthened by explicitly stating that sustaining "place" requires sustaining:
- Economically viable land-based businesses
- Active management systems
- Skilled local stewardship capacity

Without this recognition, there is a risk that "place-making" becomes focused on presentation rather than function.

2. Infrastructure, Housing and Rural Sustainability
We support sensitive, well-designed development that sustains rural communities. However, Place Outcomes must ensure that:
- Necessary agricultural and estate infrastructure is supported.
- Housing provision reflects the needs of working rural populations.
- Infrastructure for safety (e.g. access routes, emergency response capacity) is facilitated.
- Digital and utility infrastructure improvements are not unnecessarily constrained.

A protected landscape cannot remain viable if its working population is priced out or its operational infrastructure is progressively restricted. Place-based policy must therefore balance conservation with lived rural functionality.

3. Avoiding Implicit Presumptions Against Land Management
Where Place Outcomes reference landscape quality, tranquillity or cultural change, it is important that they:
- Do not imply that traditional land uses are pressures.
- Do not frame lawful activities as transitional or temporary.
- Avoid signalling downstream regulatory presumptions.

Experience in other protected landscapes shows that broad place-based language can later be cited in planning or regulatory contexts in ways that exceed its strategic intent. Clarity is essential that the Management Plan remains:
- Non-statutory.
- Informative rather than determinative.
- Management-neutral.

4. Cultural Heritage and Narrative Balance
The Forest of Bowland's "place" identity includes:
- Drystone walls and farmsteads.
- Managed heather moorland.
- Sporting and agricultural traditions.
- Estate-based conservation.
- Rural labour heritage.

The Outcomes would benefit from explicitly recognising that these traditions remain living systems rather than historic artefacts. Place is sustained not only through preservation of features, but through continuation of practices.

5. Climate Resilience and Public Safety

Place resilience must incorporate:
- Wildfire preparedness.
- Flood management.
- Infrastructure capable of withstanding climate stress.

Climate adaptation is not purely ecological; it is spatial and operational.

The Place Outcomes should therefore integrate climate risk management more explicitly as part of sustaining communities and identity.

6. Governance and Proportionality

Given that the Plan is non-statutory, it is important that the Place Outcomes:
- Do not create implied new development thresholds.
- Do not operate as informal policy beyond adopted local plans.
- Do not pre-empt national consultations or regulatory reform.

Protected landscape status must operate within the statutory planning framework, not beyond it.

Clear drafting reduces uncertainty and strengthens collaborative delivery.

7. Constructive Recommendations

To improve clarity and confidence, we recommend that the Place Outcomes:
1. Explicitly describe Bowland as a living, working rural landscape.
2. Recognise the role of viable land-based businesses in sustaining place.
3. Confirm that operational infrastructure is compatible with National Landscape purposes.
4. Integrate climate resilience and wildfire preparedness within place-based objectives.
5. Reaffirm the Plan's non-statutory status and limits.

Conclusion

The Moorland Association supports the ambition to sustain and strengthen the distinctive character of the Forest of Bowland. We remain neutral overall because the Place Outcomes would benefit from clearer recognition of economic viability, stewardship capacity, operational infrastructure and regulatory clarity. With these refinements, the Place framework could provide a balanced foundation for conserving Bowland's identity while sustaining the communities and management systems that make that identity possible. We remain willing to engage constructively to ensure that conservation ambition and rural viability are aligned in the delivery of this Plan.

Q15) Please use this final text box to share anything else you feel has not been covered or addressed in the plan:

Closing summary: what delivery confidence depends on

The Moorland Association welcomes the opportunity to comment on the draft Management Plan and recognises the genuine ambition reflected within it. We share the objective of conserving and enhancing the natural beauty of the Forest of Bowland, strengthening ecological resilience, and ensuring the landscape remains nationally significant in both environmental and cultural terms.

Core asks (governance, funding realism, legal robustness, operational practicality)

However, ambition alone does not guarantee delivery. The effectiveness of this Plan will depend not only on the clarity of its ecological objectives, but on the strength of its governance, funding realism, legal robustness and operational practicality.

Separate evidence, funding conditions, and delivery accountability
Where possible, governance should separate (i) evidence appraisal, (ii) funding/conditions, and (iii) delivery accountability. So that if outcomes are not achieved it is possible to identify why, and how to amend approaches quickly.

Checklist of improvements
Across this submission, we have identified areas where greater clarity would improve confidence in implementation, including:
- Clear articulation of governance and decision-making roles.
- Transparent recognition of the Plan's non-statutory status and limits.
- Robust Habitats Regulations compliance, including in-combination assessment.
- Explicit safeguards to prevent interpretative drift under the strengthened Section 85 duty.
- Recognition of wildfire mitigation and operational infrastructure as integral to climate resilience.
- Species-specific, evidence-led assessment of functional habitat requirements.
- Adaptive monitoring frameworks with defined review triggers.
- Financial realism and recognition of the economic foundations of stewardship.
- Clear alignment between ecological ambition and delivery capacity.

Consultation fitness-for-purpose (Cabinet Office Principles / fair consultation)
While we recognise this is a non-statutory consultation, the Government's Consultation Principles emphasise that consultations should be clear and concise, informative, targeted, and last a proportionate amount of time, taking account of the groups being consulted. In public law terms, fair consultation also requires that proposals are consulted upon while still formative, that consultees are given sufficient information to allow "intelligent consideration", that adequate time is allowed, and that responses are conscientiously taken into account. Given the length and technical density of the draft Plan and appendices, the Partnership should therefore strengthen accessibility and practical participation by publishing a short land-manager digest (plain English), offering targeted engagement sessions at workable times/locations, and setting out clearly what is fixed, what is genuinely consultable, and how consultation feedback will be reflected in the final Plan.

Practical accessibility and "meeting people where they are"
A core delivery risk is that the people expected to implement many of the Plan's outcomes (farmers, graziers, gamekeepers, contractors and small rural businesses) are time-poor, often working outdoors and are least likely to engage with long technical documents or online portals. The consultation approach should therefore be designed around how these groups actually work: proactive, place-based engagement (including in-person drop-ins in villages, attendance at existing forums/markets/association meetings, and short briefings at practical times), supported by a plain-English summary that sets out "what this means on the ground". Without that, there is a material risk that the process becomes, in effect, "we published and invited comments", rather than a genuinely representative and delivery-focused consultation that captures operational knowledge and tests feasibility.

The Forest of Bowland is a living, working landscape. Its character, biodiversity and resilience have developed through active management, sustained investment and practical expertise. Long-term environmental recovery will only succeed if those systems remain economically viable and operationally supported. Nature recovery, climate adaptation and public safety must be treated as complementary objectives. Transition without safeguards risks unintended ecological, economic and safety consequences. A Plan that embeds adaptive management, proportionality, clear governance

boundaries and partnership delivery structures will be stronger, more durable and more widely supported.

A recurring issue throughout the draft Plan is that "peatlands" (as a soil/carbon framing) appears to have displaced "moorland" (as the defining managed habitat mosaic and landscape system). We support peatland restoration where evidence supports it, but moorland management in Bowland is broader than peat hydrology alone. The Plan should consistently reflect the full moorland toolkit and the people who deliver it, including heather condition, fuel continuity/wildfire resilience, grazing balance, access and priority species outcomes.

The Association notes that the accompanying SEA and HRA screening documents explicitly recognise that Management Plans can influence future decision-making, including by shaping the strategic framework for actions and by affecting how options are framed and justified "in combination" with other plans and programmes. This reinforces the need for particularly clear, management-neutral drafting in the Plan itself, with safeguards against unintended policy drift and downstream misapplication (for example through third-party citation in planning, licensing or funding contexts). The Management Plan should therefore make clear that it does not establish new thresholds or presumptions against established land uses.

We also note that the Strategic Environmental Assessment (SEA) identifies an increased risk of large-scale and uncontrolled wildfires which may burn down into peat as a material climate-related risk. While improved indices and keeping response plans up to date are useful, they do not in themselves address the key driver of catastrophic fire behaviour: fuel continuity and fire severity at landscape scale. The Plan would therefore be strengthened by an explicit commitment to develop and implement fuel-load management plans, including how fuel treatments are strategically arranged to reduce spread and severity if an ignition occurs (protecting deep peat areas in particular), developed jointly with land managers and Fire & Rescue Services.

Appendix 5 is clear that where likely significant effects cannot be ruled out (or where uncertainty remains) the precautionary principle applies and the assessment should proceed beyond screening (and that mitigation cannot be relied upon at screening stage, consistent with the People over Wind principle). Given the high-consequence risk described (severe wildfire burning into peat and associated habitat loss), and the absence in the draft Plan of a strategic, outcome-focused fuel-load management framework to reduce severity, it is not clear that wildfire-related likely significant effects on European site features can be robustly ruled out "alone or in combination".

We also note the Strategic Environmental Assessment (SEA) observation that, unlike the previous Management Plan, this draft does not include action tables and instead relies on "outcomes and measures". In our view, this reduction in operational specificity (who does what, where, at what scale and by when) makes robust plan-level screening more difficult, because Habitats Regulations Assessment screening must be able to test likely effects using a clear source-pathway-receptor logic and rule out likely significant effects beyond reasonable scientific doubt. We therefore recommend that the Partnership either: (i) reinstates a clear delivery/action table (even if indicative), or (ii) strengthens the screening narrative to demonstrate explicitly how likely effects (including wildfire-severity pathways and in-combination effects) have been ruled out despite the reduced specificity, and ensures the final Plan contains the strategic measures that materially reduce these risks rather than relying primarily on monitoring indices and plan updates.

Ambition must also be matched by delivery realism. The Plan's objectives imply significant activity across peatland restoration, hydrological intervention, habitat expansion, water management and

resilience measures, yet the draft does not set out how these ambitions will be funded, sequenced or resourced over the lifetime of the Plan. The Plan should recognise and align with major funding and investment streams already active (or emerging) in and around Bowland, and be explicit about how such funding will be coordinated, targeted and evaluated alongside existing mechanisms (e.g. FiPL and ELM), so that actions are not duplicated, delivery responsibilities are clear, and local land managers have confidence about the longevity and conditions of support.

By way of illustration, members are aware that significant additional investment may come forward through water company programmes and landscape-scale schemes over the Plan period. While individual proposals and budgets are subject to negotiation and approval, this reinforces the need for the Plan to be clear about coordination, governance, delivery responsibilities and long-term maintenance funding—so that actions align with FiPL/ELM and do not create duplication or uncertainty for land managers.

The core point is that significant money may be "in play", but outcomes will depend on coordination, conditions, governance, transparency and long-term maintenance funding. The Management Plan should therefore be explicit about how major investment streams will be aligned with FiPL/ELM and other mechanisms, how local delivery will be agreed with land managers, and how: who pays, who leads and who maintains, once capital works are complete.

Recent independent scrutiny reinforces why the Plan now needs to move from broad ambition to a delivery framework that "adds up". The Office for Environmental Protection's January 2026 progress report concludes that government remains largely off track on environmental targets, that there is little sense of urgency, and that the window to influence 2030 outcomes is closing fast. In that context, a Bowland Plan that relies on long time horizons should be explicit about how actions will be prioritised, sequenced and scaled, and how progress will be demonstrated in a way that is credible to funders, delivery partners and local communities.

Monitoring and feedback loops ("what happened after you reported")
Effective delivery depends on credible monitoring and feedback loops. The Public Accounts Committee Report (2022-23) has observed in another enforcement context that if the public is to go to the effort of reporting, "they will need to know that action will be taken in response and they will hear what it is." The same principle applies here: publishing a clear delivery log (actions, named leads, funding source, maintenance responsibility) and an annual monitoring update against measurable indicators would make the Plan testable, improve trust, and enable rapid adjustment where measures are not delivering.

Finally, delivery confidence improves when evidence and reporting are coherent and accessible. The Public Accounts Committee Report (2022-23) has highlighted (in a different national programme) the risks of data being spread across "multiple systems… some paper-based and some digital… [where] not all information is collated centrally." A Bowland Plan that is intended to guide partner action over many years should therefore be explicit about how evidence will be captured, collated and reported in one place, and how that information will trigger review where outcomes are not being achieved.

This transparency point is echoed by the Office for Environmental Protection, which notes that its ability to assess progress and prospects is repeatedly hampered by limited detailed information and gaps in the evidence base, and that the level of disclosure of delivery-planning information is not yet consistent with what is needed for full scrutiny and accountability. A Bowland Plan intended to guide multi-partner delivery would therefore benefit from committing (up front) to publish the core

delivery planning information (actions taken, sequencing, responsibilities, and progress evidence) in a form that is easy to locate and routinely updated.

To make the Plan decision-useful (and testable for value for money), the Partnership should publish:
1. a single delivery log (actions, named leads, funding source, maintenance responsibility).
2. an annual short monitoring report against measurable indicators.
3. explicit review triggers (what evidence would prompt change).
4. a mechanism for revising measures that are not delivering or are creating unintended consequences.

The Partnership should consider piloting a formal 'Bowland Delivery Board' for priority themes (eg wildfire resilience / wader recovery), with agreed decision rights, funded participation, and balanced representation of land managers, local authorities and statutory advisers - so delivery responsibility and accountability sit closer to the ground.

We note the Plan does not address:
- The scale of private investment currently underpinning upland stewardship.
- The economic consequences if existing income streams are weakened or destabilised.
- Whether alternative funding mechanisms are secured at sufficient scale and duration.
- The transitional funding required if management systems change.

It is important to recognise that many current conservation activities, including predator management, habitat monitoring, wildfire mitigation, wall maintenance and track upkeep, are funded through private land management systems. If those systems are altered without secured financial replacement, management capacity may reduce before new funding streams are operational.

Habitats Regulations screening – "capable of influencing" remains the key test: We note the inclusion of an HRA screening in the consultation pack. However, the relevant legal question is not whether the Management Plan is formally binding, but whether it is capable of influencing future decision-making. Where a strategic document sets direction on peatland management, hydrology, woodland expansion, access/infrastructure, or species management across landscapes containing SACs and SPAs, the threshold for screening is low.

The HRA should therefore clearly explain the pathways by which the Plan's outcomes and measures could affect designated features (including through cumulative effects and foreseeable changes in wildfire risk and severity), and how those risks are being avoided or mitigated.

To improve legal robustness and decision-usefulness, the Plan would be strengthened by:
1. Making the screening conclusions explicit and easy to locate in the main Plan (for example, a summary or signposted paragraph in the "how to use this plan/governance" material), including the headline conclusions and the status of consultation with the statutory bodies.
2. Providing a clear, final screening statement (HRA and SEA) that consolidates the outcome of consultation and confirms whether any consultation-driven changes have been made to the Plan and/or screening conclusions.
3. Strengthening the "in-combination" transparency by clearly signposting (in one place) the key plans/programmes considered and the reasoning for why likely significant effects are ruled out (or the safeguards/assumptions relied upon).
4. Strengthening the signposting on the boundary between strategic direction and site/project-level assessment. This ensures clarity to all readers that the Plan guides collaboration but

does not itself pre-determine site-specific interventions, and that relevant projects will still follow the appropriate statutory assessment and consenting routes.

This is not a procedural technicality. It is a matter of legal robustness and clarity for delivery partners and competent authorities relying on the Plan. In addition, wildfire and climate transition may have implications for risk management, insurer expectations and emergency planning. Where changes in vegetation structure or hydrology may increase exposure to fire during transitional periods, clarity is required regarding responsibility, risk-mitigation funding and emergency response capacity.

Overall, the Association believes the most successful delivery model will be one that treats land managers as delivery partners, maintains management neutrality and proportionality, and aligns conservation ambition with governance clarity, funding realism and operational capacity.

If delivery partners are expected to attend governance forums and supply evidence/monitoring, participation must be properly resourced; otherwise the system structurally favours institutionally funded organisations and weakens practical delivery capacity.

Where land managers demonstrate a strong compliance and delivery record, partners should adopt an 'earned recognition' approach (eg. lighter-touch assurance, faster consents for routine resilience works), so regulatory effort focuses on the highest risks and on outcomes.

This aligns with the direction of travel in regulatory reform. The 2025 Corry Review emphasises shifting environmental regulation towards clearer, outcomes-focused practice that is easier to navigate, more consistent, and avoids unnecessary friction for those trying to do the right thing - supported by better use of data and more transparent processes. In Bowland, an earned-recognition model (paired with clear minimum standards and targeted enforcement on higher-risk issues) would help concentrate limited regulatory capacity where it delivers the greatest environmental benefit, while enabling routine resilience works and agreed stewardship measures to proceed efficiently.

Delivery will depend on governance that works at a local, place-based level. This is because the Plan's outcomes rely on multiple partners acting coherently on the ground. The 2025 Corry Review argues Defra must provide "clarity, from a spatial perspective, for how the multitude of nature and planning strategies come together in a way which local authorities and combined authorities can understand and deliver, in partnership with regulators." It further recommends using Local Nature Recovery Strategies as a basis for local Environmental Improvement Plans that Combined Authorities can work with "local partners to deliver." This supports the case for the Bowland Plan to set out clear decision rights, named ownership, funding and maintenance responsibilities, and practical mechanisms for engaging and supporting land managers as delivery partners.

Summary of changes requested
To help the Partnership of the Forest of Bowland National Landscape produce a materially improved next draft, we set out below a consolidated list of the amendments we are asking to see incorporated. This summary draws together the key points in our response and aligns them with the MA Management Plan Drafting Checklist and Annex A "red flag" tests, so that the changes requested are clear, auditable, and directly usable as an edit list for the next iteration of the Plan. The intention is to reduce avoidable consultation churn by ensuring the revised draft is decision-useful, delivery-ready, and explicit about governance, legal status, funding, and accountability.

1) Status, scope and "no policy-creep" safeguards

1.1. Put an early, prominent statement that the Plan is strategic and does not create new regulatory tests or assumptions, clearly separate aspiration from partnership intent, guidance and statutory requirements.

1.2. Explain explicitly how the Plan is intended to influence decisions (and what it cannot do), recognising it will be relied on downstream.

1.3. Where you reference the strengthened duty, add boundaries: it requires case-by-case judgement and does not override plans/policy.

1.4. Remove or avoid requirement-like drafting (we expect, must, will require, should) unless the statutory or funding basis is cited; otherwise shift to "may, could, support".

2) Co-design before consultation (and evidence it)

2.1. Show that the draft was co-designed with the delivery workforce (farmers, graziers, gamekeepers, estate managers, commoners, contractors), not just "engaged during consultation".

2.2. Add a short "who designed this and how" box: dates, representation, how disagreements were handled, what changed.

3) Plain-English companion: "what this means for land managers"

3.1. Provide a standalone Plain English summary (or clear in-plan section). This should cover: what changes for farming and or grazing, moorland operations, gamekeeping, access infrastructure, predator control, burning or cutting, track maintenance, plus what is voluntary vs statutory, and funding routes or conditions.

4) Risk-to-action traceability (auditability)

4.1. For every significant risk or pressure identified, include at least one linked measure (not just aspiration).

4.2. Minimum mapping for consultation readiness:
   a. what you'll do about it (the measure/action)
   b. who is responsible
   c. when it will happen (or what will trigger it)
   d. how you'll measure if it's working, and
   e. when you'll review it and change course if needed.

4.3. Avoid "action soup" (actions with no linked risks) and avoid listing risks with no actions.

5) Delivery model and funding realism

5.1. Add a clear delivery architecture: named leads and partners per theme, "how delivery happens", dependencies.

5.2. Provide credible funding/resourcing assumptions (not necessarily full costings) and show prioritisation (avoid repeated "subject to funding" wish-lists).

5.3. For new works (tracks, bridges, drains, fire ponds/water points, visitor infrastructure), state who maintains, who pays, standards/consents - close the long-term liability gap.

5.4. Include a proportionate economic delivery assessment of proposed changes - particularly unintended impacts on viability of existing management systems and the risk of losing private investment (creating unfunded public liabilities and habitat-condition decline).

6) Governance, conflict resolution and adaptive triggers

6.1. Establish a standing mechanism to resolve conflicts (eg. access vs wildfire risk; habitat condition vs grazing; predator-prey conflicts) and define how decisions are made.

6.2. "Adaptive management" must have defined triggers, review cycle, and who convenes - otherwise it becomes rhetorical cover.

6.3. Avoid "pilot, explore, consider" as the main action. Instead set decision points, timelines and evidence thresholds.

7) SEA/HRA clarity and legal robustness

7.1. Make SEA/HRA screening and outcomes easy to locate with a consolidated statement in the main Plan; add a short plain-language summary.

7.2. Address pathways, assumptions and in-combination transparently (avoid "no likely significant effects" without explanation).

7.3. Don't use "assessed at project level" as a blanket deferral - state what's deferred and how strategic risks are controlled meanwhile.

8) Wildfire risk and operational resilience as core plan logic

8.1. Treat wildfire as a strategic climate and public safety risk (not a footnote) with measurable commitments.

8.2. Include an expectation for a Fuel Load & Wildfire Operations Plan: fuel continuity and load mapping, strategic breaks, access and water points, maintenance responsibilities, review triggers.

8.3. Avoid blanket "minimise/avoid infrastructure" language; add a compatibility statement that essential access and safety infrastructure can be consistent with purposes if well-designed.

9) Heather moorland management explicitly addressed (not subsumed into "peatland")

9.1. Add a dedicated heather moorland management section covering: age structure and mosaic logic, fuel-load implications, roles of grazing, cutting, burning, wildfire prevention, access operations and explicit trade-offs with peat objectives (including transitional risks).

10) Gamekeepers explicitly recognised as delivery partners

10.1. Identify gamekeepers alongside farmers and land managers as part of the skilled delivery workforce where relevant (monitoring, predator control, fire response, habitat work, access upkeep), using neutral, factual language.

11) Species management: evidence pathways and lawful framing

11.1. Set out clear evidence pathways for priority species outcomes, how success will be judged, and what happens if trends worsen.

11.2. Where predator control is referenced, frame it as lawful, proportionate, targeted, monitored, outcomes-driven, not as inherently problematic by default.

12) Landscape character and "working landscape" baseline

12.1. State clearly that Bowland is a **living, working landscape** and many valued characteristics result from sustained management (avoid "rewilding-by-default" tone).

12.2. Ensure the Landscape Character Assessment (LCA) is used to guide siting and design (woodland expansion and infrastructure) rather than creating implied presumptions against lawful practice.

13) Monitoring, KPIs, transparency

13.1. Commit to a small set of measurable indicators with frequency, responsibilities, and publication; include a "what happens if it isn't working" clause.

13.2. Avoid "we will monitor" without indicators, frequency and responsibility.

14) Drafting clean-ups to reduce consultation churn

14.1. Replace ambiguous shields ("not binding") with decision-proof boundaries ("no new tests or presumptions", intended decision-use, limits).
14.2. Avoid diffuse accountability ("partners will…") - name leads and dependencies.
14.3. Convert "encourage, support, promote" heavy text into actions and measures with owners, triggers and KPIs.
14.4. Use concrete groups instead of "stakeholders" when delivery depends on them.
14.5. Explicitly acknowledge consents, property rights and feasible routes to agreement where delivery implies permissions.

Q16) Would you like to comment on the Climate Adaptation Plan?
☑ Yes

Q17) If 'yes': How far do you agree that the Climate Adaptation Plan covers the key issues and sets out the required measures to adapt to climate change?
☑ Neutral

Q18) Please add any further comments about the Climate Adaptation Plan:
The Moorland Association welcomes the preparation of a dedicated Climate Adaptation Plan and supports the recognition that climate change presents material risks to peatlands, water systems, species abundance, farming viability and community resilience within the Forest of Bowland.

The Plan identifies many of the correct high-level risks, including hotter drier summers, more intense rainfall events, hydrological instability and biodiversity stress. However, we remain neutral overall because the Plan does not yet fully integrate operational risk management, wildfire resilience, economic viability and adaptive governance into its delivery framework. Our comments are set out below.

1. Wildfire as a Core Climate Risk
The Climate Adaptation Plan correctly identifies hotter, drier summers and increased heatwaves. However, it does not treat wildfire risk as a central and explicit climate adaptation priority. In upland systems, wildfire represents:
- A direct threat to peat carbon stores.
- A reversal risk for restoration gains.
- A biodiversity loss event.
- A public safety hazard.
- A financial liability for communities and emergency services.

Adaptation planning must therefore integrate:
- Proactive fuel load management.
- Maintained access infrastructure.
- Emergency response coordination.
- Strategic firebreak planning.
- Monitoring of vegetation structure.

While peatland re-wetting is highlighted as a key adaptation action, the Plan does not sufficiently address how fuel continuity will be managed during transition periods or in areas where re-wetting is incomplete or not possible.

Climate adaptation cannot rely solely on hydrological restoration; it must also incorporate operational risk mitigation.

The Plan's risk assessment identifies an "increased risk of large scale and uncontrolled wildfires which may burn down into the peat." We agree this is a material risk. However, the proposed response (supporting a more practical fire severity index and maintaining up to date fire plans) does not, on its own, address the underlying drivers of large severe fires.

What would address this risk is the development and implementation of fuel load management plans, including how fuel treatments are strategically located and configured across the landscape to reduce fire spread and severity if an ignition occurs (ie. breaking fuel continuity, protecting deep peat areas, and supporting safe suppression). These plans should be developed with land managers and Fire & Rescue Services and linked to clear roles, training and access/water infrastructure.

2. Adaptation Must Remain Management-Neutral

The Plan refers to land use change and potential shifts in farming and moorland management systems. Climate adaptation measures must not implicitly assume that reduced intervention or management withdrawal is inherently adaptive. Active management often contributes to:

- Vegetation heterogeneity.
- Reduced fuel continuity.
- Maintained drainage where necessary for stability.
- Species support through targeted interventions.

Adaptation strategies must therefore remain:

- Site-specific.
- Evidence-led.
- Proportionate.
- Compatible with lawful land management systems.

Blanket prescriptions risk unintended consequences.

3. Economic Viability as an Adaptation Variable

Climate resilience depends upon stewardship capacity. The Plan acknowledges potential viability challenges for farming and moorland systems but does not sufficiently recognise that:

- Loss of economic viability reduces adaptation capacity.
- Reduced workforce presence weakens monitoring and emergency response.
- Private investment is currently supporting restoration at scale.

Adaptation planning must therefore include economic resilience as a delivery component, not treat it as an external variable.

4. Infrastructure and Public Safety

The Climate Adaptation Plan would benefit from stronger recognition of:

- Access track maintenance for emergency response.
- Drainage management to protect both peat condition and public infrastructure.
- The need for flexible water management in extreme rainfall scenarios.
- The role of estates and land managers in first-response wildfire suppression.

Climate adaptation is not solely ecological restoration; it is operational preparedness.

5. Adaptive Management and Monitoring

The Plan outlines projected risks under 2°C and 4°C scenarios. However, adaptation measures should be accompanied by:

- Clear monitoring frameworks.
- Transparent review points.
- Willingness to adjust interventions if unintended consequences arise.
- Cross-agency coordination mechanisms.

Given the uncertainty inherent in climate modelling, adaptive management must be embedded explicitly as a core principle.

6. Regulatory Clarity

The Climate Adaptation Plan should reaffirm:

- Its non-statutory status.
- That it does not pre-empt national peatland evidence reviews.
- That it does not establish implied prohibitions beyond current law.
- That measures will operate within existing regulatory frameworks.

Clear boundaries are essential to avoid uncertainty in planning and land management contexts.

7. Constructive Recommendations

To strengthen the Climate Adaptation Plan, we recommend:

1. Explicit recognition of wildfire as a primary climate risk.
2. Integration of fuel management within adaptation strategy.
3. Clear acknowledgement of economic viability as part of adaptation capacity.
4. Stronger reference to infrastructure and operational resilience.
5. Commitment to adaptive, evidence-led review mechanisms.
6. Clear confirmation of non-statutory limits.

Conclusion

The Moorland Association supports the ambition to prepare the Forest of Bowland for the impacts of climate change. We remain neutral overall because, while the Plan identifies key climate drivers, it does not yet fully integrate wildfire resilience, operational risk management, economic viability and adaptive governance into its framework. With clearer emphasis on these elements, the Climate Adaptation Plan could provide a robust and deliverable foundation for climate resilience in this nationally important working landscape. We remain willing to engage constructively to ensure adaptation objectives are both environmentally ambitious and practically grounded.

Q19) Would you like your name to be displayed alongside your comments?

- Yes
- No (if no, your response will remain anonymous)