

# North Pennines National Landscape Management Plan (2026–2031)

## Moorland Association consultation response

The question numbers shown below are the ones used on the consultation website.

### THE VISION

#### 4. To what extent do you agree with the Vision for the North Pennines in 2040?

☒ Disagree

#### 5. Why do you feel this way?

The Moorland Association recognises the stated ambition of the Vision to conserve and enhance natural beauty. However, this recognition does not constitute agreement with any implied policy direction, delivery pathway or any future interpretation that would undermine lawful land management, operational viability, the protection of property rights, or public safety.

The North Pennines is a living, working landscape. Its condition and character are the result of active, skilled land management, often delivered through private investment and professional stewardship, not the withdrawal of management. Even government policy for protected landscapes acknowledges the importance of continued farming and management; as Defra stated in 2023, these areas have a “*long tradition of farming in tune with the landscape*” and thriving farm businesses are “*crucial to these areas*” [here](#). Any future delivery of the Vision must therefore explicitly safeguard land management capacity, lawful practices, and the economic systems that sustain stewardship, rather than assuming ‘transition,’ change, or reduced intervention as a default.

Withdrawal or dilution of management should not be assumed to deliver positive outcomes. Indeed, evidence indicates that unmanaged or ‘abandoned’ land can accumulate fuel and heighten wildfire risks. A recent scientific analysis of wildfire data found that areas without proactive management (eg. unmanaged shrublands) suffered disproportionately more fires, whereas integrated land use reduced wildfire incidence by removing excess vegetation (Damianidis et al 2021). No current government policy mandates land abandonment as a preferred strategy for upland improvement, and the Vision should not imply otherwise.

Moreover, the Vision would be strengthened by explicit recognition of the cultural heritage contributions of moorland estates, gamekeeping and driven grouse shooting (alongside farming and other historic land uses). These traditional practices have shaped the upland landscape for generations and continue to do so. Omitting such systems risks presenting an incomplete and misleading account of how the North Pennines’ landscape has been formed and maintained.

For example, driven grouse shooting and associated moorland management currently generate significant investment in upland conservation. This includes over £1 million per week in private spending on moor management according to recent analyses, whilst supporting hundreds of jobs (People’s Plan for the Uplands). This private stewardship underpins habitat management, predator control, peatland restoration and wildfire mitigation on many moors. Failing to acknowledge these contributions in the Vision would ignore an essential part of the area’s story and current resource base.

In summary, the Association stresses that the future resilience, safety and ecological condition of the North Pennines depend on maintaining active, lawful and economically viable land management. The Vision should clearly reflect that reality. It should not assume that reducing or withdrawing management will automatically lead to better outcomes. In many contexts it would do the opposite,

increasing wildfire risk and leading to a loss of skilled capacity on the land. The Vision must celebrate the North Pennines as a managed landscape and ensure that those who manage it (farmers, gamekeepers, estate owners) are treated as essential partners in delivering its 2040 ambitions, not as obstacles.

## CORE PRINCIPLES

### 6. To what extent do you agree with the Core Principles?

☒ Disagree

### 7. Why do you feel this way?

We do not oppose the stated Core Principles in general (they appear well-intentioned) but we cannot accept their application where they are used, explicitly or implicitly, to justify regulatory creep, implied prohibitions, or the treatment of non-statutory guidance as de facto policy. The principles must be applied in a manner that is evidence-led, proportionate, site-specific and management-neutral (ie. not pre-judging any lawful land use as a problem). They must not be used to reframe lawful land management as something undesirable in need of 'correction.' This concern reflects broader findings about environmental regulation. For instance, the National Audit Office 2026 report (NAO) observed that effective regulation should be '*evidence-based and proportionate*' and not impose unnecessary burdens. If the Core Principles are interpreted without evidence or proportionality, there is a risk of veering into unofficial policy-making.

Other protected landscapes have addressed similar challenges in a way that both supports statutory purposes and clearly recognises lawful, long-established land management. For example, the draft Forest of Bowland Management Plan 2026-31 explicitly frames the area as a living, working landscape, refers neutrally to existing upland land uses (including grouse moor management), and recognises the practical consequences of management withdrawal, such as the loss of skilled personnel and on-the-ground capacity. This approach demonstrates that it is entirely possible to articulate ambition for nature recovery while remaining management-neutral, evidence-led and proportionate. The Association encourages the North Pennines plan to adopt similarly clear and balanced drafting, to reduce the risk of misinterpretation and unintended downstream effects.

Regulatory creep does not arise only through formal rule-making or changes in statute. It more commonly occurs incrementally, where non-statutory plans are cited as material considerations, then treated as benchmarks for good practice, and ultimately applied as if they carried policy or quasi-regulatory weight. This risk is well recognised in environmental governance and is heightened where plan wording is ambiguous or aspirational statements are not clearly separated from enforceable requirements.

To avoid doubt, the Management Plan should explicitly and repeatedly state its non-statutory status and the limits of its role. It is a strategic and partnership document intended to guide collaboration and inform discussion, not to create new policy, impose additional regulatory tests, or narrow the lawful scope of land management activities. The Plan must not be used to pre-empt, anticipate or influence the outcomes of ongoing or future national policy development, consultations or licensing regimes led by Defra or other competent authorities. Clear separation between aspiration, guidance and regulation is essential to ensure the Plan strengthens cooperation rather than creating uncertainty or conflict.

The Association is particularly concerned that ambiguous wording in the Plan could allow non-statutory aspirations or guidelines to be treated as binding policy. Clear, enforceable boundaries between aspiration, guidance and regulation are essential. Non-statutory plans cannot lawfully narrow, pre-empt or override existing statutory permissions, licensing regimes or lawful land management activities. Nor should they pre-judge the outcomes of ongoing or future Defra

consultations or regulatory frameworks.

The Association further stresses that the Management Plan must not assume, anticipate, or seek to normalise outcomes that are currently subject to national consultation, evidence review, or regulatory reform led by Defra or other competent authorities. To do so would risk pre-empting due process, undermining the integrity of national policy development, and creating uncertainty for land managers operating lawfully under existing regimes. To avoid doubt, the Association recommends that the Plan explicitly confirm that it does not pre-empt, anticipate, or seek to influence the outcomes of ongoing or future national policy development, consultations, licensing regimes, or statutory reform processes.

The Association also notes that constraint can arise not only from explicit prohibitions, but from the absence of clear safeguards, recognition of operational requirements, or acknowledgment of lawful management needs. In practice, where precautionary approaches dominate, silence or ambiguity in a Management Plan can be interpreted as a presumption against activity, creating de facto restriction even in the absence of an explicit ban.

Any attempt to give the Management Plan pseudo-regulatory weight would be improper. By law, an AONB Management Plan is a document that local authorities prepare and publish to 'formulate their policy for the management of the area and for the carrying out of their functions in relation to it' (Countryside and Rights of Way Act 2000). It guides and coordinates, but it does not create new legal duties or override established rights. This Plan must be kept within its statutory remit as a partnership and guidance document, rather than a rulebook.

The Association's concern is not about the stated intent of the Management Plan or informal assurances given during engagement, but about how its language, structure and framing may reasonably be interpreted and applied by third parties in decision-making. Informal explanations of intent cannot mitigate risks arising from ambiguity in the published text, particularly where the Plan may be relied upon by bodies beyond the National Landscape Partnership itself. The Association's concern here is not with the Partnership's stated intent, but with the foreseeable effects of the Plan's wording once it is published and relied upon beyond the Partnership itself.

In practice, Management Plans are routinely relied upon by a wide range of downstream actors who are not involved in their drafting and are not party to informal explanations of intent. These include local planning authorities, statutory consultees, regulators, inspectors and third-party objectors. The way such bodies may reasonably interpret and apply the Plan therefore matters as much as how it is intended to be used by the Partnership itself. Informal correspondence, consultation discussions, or post-draft assurances cannot provide a safeguard against misapplication, as they do not travel with the document and carry no weight in subsequent planning, regulatory, or inspection contexts. The relevant consideration is how a reasonable decision-maker could interpret and rely upon the Plan's wording, rather than how it is subjectively intended to be applied.

We are concerned that the draft Management Plan appears to have been prepared without a clear Habitats Regulations Assessment (HRA) screening, despite representing a material change in policy direction compared to the previous North Pennines AONB Management Plan. The draft introduces new and more directive outcomes and measures relating to peatland hydrology, burning, scrub and tree expansion, predator management and land-use change across a landscape that contains, and is functionally connected to, multiple European sites (SACs and SPAs).

AONB / National Landscape Management Plans are capable of constituting a "plan or programme" for the purposes of the Habitats Regulations where they set a strategic framework that may influence future decisions by competent authorities. This is not a hypothetical concern: the previous North Pennines AONB Management Plan explicitly recorded that it was informed by Habitats Regulations

Assessment, recognising the potential for likely significant effects on designated sites.

Given the low legal threshold for HRA screening, and the well-established principle that beneficial intent does not remove the need for assessment, we do not consider it safe or appropriate to proceed on the assumption that the draft Plan can rule out likely significant effects without objective evidence. At minimum, a formal HRA screening should be published alongside the Plan, clearly demonstrating whether likely significant effects can be excluded, alone or in combination with other plans and programmes.

This reinforces the need for plan-level clarity on Habitats Regulations compliance, rather than relying solely on project-by-project checks downstream.

In this context, it is relevant that hen harrier breeding distribution in England is disproportionately associated with managed grouse moor landscapes. Despite grouse moors comprising approximately half of the available upland habitat, around 80% of breeding hen harriers are recorded on or adjacent to such moors. This is widely understood to reflect functional habitat factors, including reduced nest predation pressure, suitable ground-nesting structure created by heather management, and reliable prey availability during the breeding season. These conditions arise from specific land management systems rather than habitat extent alone.

Any strategic Plan that signals a presumption against those management systems, or that promotes widespread withdrawal or alteration of predator control, heather management or moorland openness, therefore has the potential to affect the conservation status of SPA qualifying features. Under the Habitats Regulations, the relevant test is not intent but risk. Given the reliance of current hen harrier distribution on actively managed moorland, the Plan cannot reasonably rule out likely significant effects in the absence of explicit safeguards, evidence of equivalently effective alternative management, or a published Habitats Regulations Assessment screening.

In the absence of this, there is a real risk that the Plan is procedurally vulnerable and that its outcomes and measures could be challenged, or inconsistently applied, once relied upon by public authorities in planning, regulatory or funding decisions. Addressing this issue openly would strengthen the Plan, provide legal clarity for all parties, and help ensure that nature recovery objectives are pursued within a robust and lawful framework.

We believe the Plan would be strengthened by clearer governance arrangements setting out how conflicts between public bodies will be resolved in practice. Without defined coordination mechanisms between the various authorities (local councils, National Landscape Partnership, Natural England, Environment Agency, Fire & Rescue Services etc.), land managers risk being caught between inconsistent requirements or facing unmanageable uncertainty. In practical terms, if one agency pursues a principle in a way that conflicts with another agency's remit (for example, a conservation objective vs. a public safety requirement), there needs to be a transparent process for resolution. Currently, that clarity is lacking.

In summary, we seek assurance that the Core Principles will not be used to expand regulatory control by stealth. They should guide positive action and collaboration, not act as a backdoor for imposing restrictions. As the National Audit Office and Public Accounts Committee have stressed, environmental objectives must go hand-in-hand with supporting productive rural businesses and must be pursued through practical, flexible approaches grounded in evidence.

The persistence of these concerns despite engagement reflects not a lack of goodwill, but the scope for differing interpretations of the Plan's wording, reinforcing the need for greater clarity and drafting safeguards.

We urge that these principles be applied with that mindset.

## **PLANNING & DESIGN**

### **8a. Planning & Design Outcome**

☒ Disagree

### **8b. Planning & Design Guidelines**

☒ Disagree

### **8c. Detailed comments**

The Association does not agree with the Planning & Design Outcome or the draft Design Guidelines where these would constrain essential land-management infrastructure, operational access, safety provisions or estate viability. We note that the draft Design Guidelines themselves state they are not intended to place unnecessary restrictions on development or innovation. We strongly support that principle. To ensure this in practice, any application of the Guidelines must actively accommodate the functional requirements of land management and community needs, rather than discouraging them. Features such as tracks, bridges, fences, signs, emergency equipment storage etc. should be viewed as integral to the landscape's use and safety, not as intrusions.

Any application of the new Section 85 duty (the recently strengthened duty on public authorities to 'seek to further' AONB purposes) must remain lawful, proportionate, evidence-based and subject to proper governance and accountability. The strengthened duty (introduced via the Levelling Up and Regeneration Act 2023) does **not** create new planning policy, nor does it override adopted development plans.

It must not be treated as a decision-making shortcut or used to impose blanket bans. The law now requires public bodies to be proactive in furthering AONB purposes, but it 'is qualified'. Authorities must seek to further those purposes, not necessarily fulfil them in every decision, and they must still balance other material considerations. Courts have clarified that authorities must explain their reasoning if they approve something that harms natural beauty, but the duty 'invests the decision-maker with responsibility to judge' the case in context (*R[CPRE Kent] v SoS Housing, Communities & Local Govt*, 2025). It does not bar all development or management causing any harm. In other words, Section 85A should not be misused to veto legitimate activities or needed infrastructure. It requires a higher level of scrutiny and justification, not an absolute prohibition.

It is important to stress that what constitutes "seeking to further" the statutory purpose cannot be exhaustively defined in a non-statutory Management Plan. That judgement must remain case-specific and sit with the relevant decision-maker, taking account of the National Planning Policy Framework, adopted development plan policies, site context, evidence and other material considerations. The role of the Management Plan is to inform understanding of the landscape and encourage high standards, not to establish new tests, presumptions or thresholds that would in practice constrain planning or regulatory decisions. Any suggestion that compliance with the Plan equates to compliance with the Section 85 duty, or that departure from it implies failure to discharge that duty, would be legally incorrect and risks misapplication.

Importantly, this duty applies to public authorities in their decisions. It is not a mandate to circumvent normal planning processes or property rights via the Management Plan. We caution that if the strengthened duty were applied overzealously or selectively (eg. to stall routine farming or estate improvements under the banner of 'furthering natural beauty'), it would risk legal uncertainty and loss of trust. The Management Plan should acknowledge that the Section 85 duty must be applied alongside principles of fairness, proportionality and evidence, it cannot override lawful land management or existing planning policy by itself.

We encourage continued recognition in planning of the operational needs of land management and estates. For instance, maintaining private access tracks (for farm vehicles, gamekeepers and wildfire response), ensuring drainage for both land productivity and road safety, providing turning areas for emergency vehicles, and building necessary storage or shelter structures. All of these can be done with sensitivity to landscape character, and they are essential to safety and stewardship. Such developments should be facilitated, not discouraged. Indeed, many of these features contribute to the landscape's resilience. For example, well-placed tracks can double as firebreaks or allow firefighters rapid access in a wildfire scenario. Planning and design guidance should explicitly state that supporting public safety infrastructure (fire ponds, rescue access etc.) and sustainable land use is part of conserving a living landscape.

We also stress that 'landscape-led design' should support, not displace, long-established working land uses. It must not drift into a narrow 'natural capital' approach that prioritises speculative restoration at the expense of the farming or moorland management systems which actually maintain the open upland character. Government's own recent statements emphasize that protected landscapes are not museums. They are home to working communities and businesses and policy should reflect that. The Defra Secretary noted in 2023 the aim of "*creating a national network of beautiful, nature-rich spaces that can be enjoyed by all parts of society*" this must include those who live and work in these places (Defra 2023). The Plan should therefore ensure that design and planning decisions enable sustainable economic activity and safety (eg. farm diversification, game management needs, visitor facilities) as long as they are in keeping with the area's character.

In summary, planning and design guidance should complement existing local planning policies and the National Planning Policy Framework (which already gives great weight to AONB landscapes), while enabling the development necessary for safety, sustainability and economic vitality. It should not impose new blanket rules by virtue of the AONB status alone. We seek assurances that the Plan's guidance will be applied in the spirit of partnership, working with land managers on pragmatic solutions, rather than as an additional hurdle. As long as this balance is maintained, we are confident that high-quality design can go hand-in-hand with a thriving, safe upland economy.

## **LANDSCAPE CHARACTER**

### **9a. Landscape Character Outcome**

☒ Disagree

### **9b. Why do you feel this way?**

Landscape character in the North Pennines is rightly described in the Plan as the product of long-term human management as well as natural processes. Crucially, open moorland character is an actively maintained condition, sustained through lawful land management rather than through withdrawal or benign neglect.

In this context, it is essential that the Plan describes existing lawful land uses in a neutral and factual manner. Long-established activities such as farming, grazing, grouse moor management and associated estate operations should not be framed implicitly as pressures to be corrected or transitional activities to be moved away from, unless and until site-specific evidence demonstrates a need for change. Experience elsewhere shows that even subtle shifts in tone can lead third parties to treat management plans as signalling a presumption against certain lawful practices, with consequences for planning decisions, regulatory engagement and trust. The Association therefore urges careful, neutral drafting that recognises these land uses as part of the baseline from which enhancement is considered, not as problems in themselves.

The Association cannot agree with any framing that implies landscape enhancement will be achieved *by default* through the removal of management, uniform prescriptions, or passive change.

Any proposed change to landscape character must be justified by site-specific evidence and assessed for its implications on openness, scale, historic pattern and wildfire risk. There is no national policy that says an AONB/NL's landscape should be 're-wilded' or allowed to scrub over. On the contrary, the statutory purpose is to conserve and enhance natural beauty, which includes its historic managed character. We caution against any suggestion that the North Pennines landscape is somehow in need of transformation away from its current open, managed state. Such an implication goes beyond government policy and could mislead stakeholders.

### **9c. Landscape Character Measures**

☒ Disagree

#### **9d. Why do you feel this way?**

Landscape Character Measures must be applied with clear safeguards to prevent misuse in decision-making. We support measures to document and protect what makes this landscape special. However, open moorland character must not be reinterpreted through a climate-change or natural-capital lens as a proxy justification for constraining lawful land management.

We have seen in other contexts that 'landscape character' arguments can be stretched beyond their intended purpose. For example, in some planning cases, normal farming or moorland practices have been challenged as altering landscape character, when in fact they created that character. Measures should therefore be applied proportionately and remain evidence-led. They should avoid uniform or assumption-based prescriptions. Clear boundaries are needed to ensure that landscape character considerations are not used to pre-empt regulatory decisions or to restrict essential land-management activity under the guise of aesthetics.

In practice, this means the Plan's commitments on landscape should be descriptive and guiding, not prescriptive. For instance, it can encourage that new woodlands respect open vistas and historic patterns, but it should not imply that typical moorland management (like controlled burning or grazing) is counter to landscape goals. These are the very activities that have shaped the landscape. It can promote the burying of cables or good building design (which we support), but it shouldn't create a veto on necessary farm buildings or game infrastructure. We note that the Management Plan is not a regulatory instrument. It cannot change land use by itself, only influence through partnership. We will resist any attempts to use landscape character as a backdoor way to curtail lawful practices (eg. *'because it looks nicer if there is no burning'*. This must be backed by evidence of harm, rather than opinion).

In conclusion, we ask for explicit reassurance in the Plan that landscape character measures will not be allowed to drift into unintended restrictions. The focus should be on positive landscape management (eg. maintaining drystone walls, managing vistas, protecting archaeological features in the landscape) in collaboration with land managers. By doing so, the Plan can ensure that 'landscape character' remains a unifying concept, not a contentious one.

## **GEODIVERSITY**

### **10a. To what extent do you agree with the Geodiversity Outcomes, in general?**

☒ Neither agree nor disagree

#### **10b. Why do you feel this way?**

The Moorland Association recognises that soils, peat, hydrology and landform are fundamental to the character, resilience and functioning of the North Pennines. We support the intention to conserve and restore these geodiversity features. However, we caution that the geodiversity of the uplands is not a static or 'hands-off' asset. Its condition has been shaped and sustained through long-term, active

land management. We do not accept interpretations of geodiversity that presume reduced intervention or management withdrawal as a default pathway to improvement. For example, peatlands in this landscape have been actively managed for generations (through grazing, draining/blocking cycles, burning etc.) and some degree of management is often needed to maintain their ecological function (such as controlling invasive species or managing water levels).

Geodiversity objectives must draw a clear distinction between genuinely damaging disturbance and purposeful, evidence-based management undertaken to maintain soil stability, hydrological function, access and wildfire resilience. In some cases, what might superficially seem like ‘disturbance’ (eg. creating fire ponds or maintaining ditch networks) is actually beneficial for soil and water conservation when done right. The Plan’s narrative should reflect that nuance.

### **I0c. To what extent do you agree with the Geodiversity Measures, in general?**

☒ Neither agree nor disagree

### **I0d. Why do you feel this way?**

Geodiversity Measures must be implemented in an evidence-led, proportionate and collaborative manner. They must not be used to justify precautionary restriction of lawful land-management activity in the absence of site-specific evidence of harm.

We want to see clear safeguards to ensure consistent and fair application. In particular, evidence thresholds should apply equally to proposed new restrictions as to existing practices. If a measure suggests, for example, preventing vehicle use on certain tracks to protect peat, it should be backed by hard evidence that such use is causing significant harm (just as any existing practice must be evidenced if it’s claimed to be harmful). Symmetry of evidence is key. Measures implying change or new limits should face the same level of evidential scrutiny as current practices do, rather than assuming current practices are ‘guilty’ until proven innocent.

We also encourage the Plan to prioritize adaptive management and monitoring rather than fixed, one-size-fits-all prescriptions. Upland geodiversity is complex and site-specific. A blanket ban or requirement could have unintended consequences. For example, restricting management might preserve peat in one sense, but if it removes firebreak creation or suppresses local knowledge, it could worsen wildfire outcomes or peat loss in fires. Similarly, universally blocking old drains might rewet areas (good for peat), but if done without monitoring, could cause water overflow or slope failures elsewhere. Adaptive approaches (trial, monitor, adjust) are safer.

Without these safeguards, there is a risk that geodiversity measures could be misapplied as a broad constraint on routine land management (eg. prohibiting track maintenance, halting controlled burning or mowing for fuel management etc.) thereby increasing uncertainty for land managers and potentially undermining effective delivery. We note that Defra is currently undertaking an extensive evidence review on peatland management, including burning vs. rewetting (Defra Peatland Evidence Review 2025-2027). The Management Plan should not jump ahead of that scientific process by cementing any one viewpoint as ‘the rule’, especially not without full consideration of trade-offs.

In summary, we cautiously neither agree nor disagree. We support geodiversity conservation, but the devil is in the detail. We need measures that work with knowledgeable land managers and existing good practice, not ones that simply restrict and hope for the best. If the Plan can clarify this (that geodiversity will be protected through partnership and evidence-based action) then we could support it. As it stands, more reassurance is needed.

## **NATURE RECOVERY – PEATLAND & HEATHLAND (NRI)**



**I 1a. To what extent do you agree with the Nature Recovery NRI Peatland and Heathland Outcome, in general?**

☒ Disagree

**I 1b. Why do you feel this way?**

The Moorland Association does not agree with the NRI Outcome as currently framed. It establishes a presumption against established, lawful land management practices (particularly controlled heather burning) without demonstrating that alternative approaches can effectively manage fuel loads, wildfire risk, access and operational resilience at landscape scale. This presumption amounts to effectively setting a new policy ban on certain practices without legal basis or proven alternatives.

We cannot accept blanket assumptions that 'management withdrawal' will deliver better outcomes on peatlands. Such assumptions are not supported by the evidence base in actively managed upland systems and they present clear public safety risks.

We fully support the objectives of peatland restoration, ecosystem resilience and climate mitigation set out as high-level goals under NRI. Healthy peatlands are in everyone's interest. However, support for high-level objectives does not equal acceptance of prescriptive or blanket delivery mechanisms. Several elements of the Outcome are worded in a way that suggests uniform, top-down measures rather than site-specific, evidence-led management. In particular, the proposal to "*end prescribed burning on all peat soils*" (draft Action NRIg) reads as a default prohibition of an established management tool, rather than recognising the need for locally tailored approaches that take account of peat condition, vegetation structure (fuel), access constraints and wildfire exposure.

Such a sweeping measure goes beyond current legal restrictions on burning. At present, burning is regulated but not universally banned. Defra has prohibited burning on *deep peat* (>30cm) in certain protected sites (SSSIs, SACs) except under license, and all burning is seasonally limited by law. There is no outright ban on burning on *shallower* peat or outside those areas. The Plan's blanket ban would effectively impose a new restriction across the AONB without statutory backing.

In essence, it would be making policy by Management Plan - which is not the proper role of this document. We believe a more conditional and evidence-based Outcome is essential for credibility and safety. For example, an Outcome could say 'peatlands are managed in ways that restore natural function and reduce wildfire risk, using a toolkit of methods (rewetting, cutting, burning as appropriate) guided by the best available evidence and subject to regulatory controls.' That wording would set the goal without prescribing the tool universally.

Additionally, the Outcome narrative currently contains negative references to gamebird releasing (phrased in terms of perceived impacts) without an equivalent consideration of demonstrable benefits. This one-sided context undermines confidence in the Plan's neutrality and evidential robustness. Gamebird releasing is a lawful activity conducted under established best-practice guidelines and, in certain areas, under licensing controls (for example, since 2021 in England, releases on or near European protected sites are regulated by Natural England licensing).

Any narrative on this topic should acknowledge both sides: the existing regulatory context and best practices, *and* the potential impacts. The Plan also underplays the economic reality that many nature recovery outcomes in the uplands (habitat restoration, predator control, monitoring) are currently underpinned by private sporting investment. If traditional income streams (like grouse shooting) are weakened or destabilised without viable, secured alternatives, the result will likely be *reduced land management capacity* rather than enhanced nature recovery.

The 2026 National Audit Office report on environmental funding notes that overly ambitious reforms without supporting economic transition can risk delivery failures. The Plan should heed that

principle. Finally, the Outcome proposes significant change to established management systems without setting out sequencing, review points, safeguards or fallback mechanisms should expected outcomes not materialise (or if wildfire risk increases). Transition without safeguards is not acceptable. It would expose land managers, communities and emergency services to increased risk.

We have unfortunately relevant examples. In locations where burning was stopped abruptly, wildfire extent and intensity have in some cases worsened due to unmanaged fuel (a point raised even by peatland conservation advocates who acknowledge a “*period of transition*” needs careful management).

The Plan should explicitly commit to an adaptive management approach. If certain interventions (like rewetting or cutting in lieu of burning) are not working as hoped, or if they cause problems, there must be openness to course-correct. Moreover, many estates operate under existing SSSI management agreements or agri-environment schemes that *do* incorporate controlled burning and other practices. A sudden blanket change in policy could conflict with those agreements and create legal confusion. We need clarity on how such conflicts would be resolved.

In summary, we disagree with NRI as drafted. We ask for a reframed Outcome that emphasizes evidence-led, site-specific peatland management for multiple benefits (carbon, biodiversity, water, wildfire mitigation) that does not single out one tool for blanket elimination beyond current law. The Plan must ensure any transitions are done safely and in partnership with those on the ground.

**I Ic. To what extent do you agree with the Nature Recovery NRI Peatland and Heathland Measures, in general?**

☒ Strongly Disagree

**I Id. Why do you feel this way?**

We strongly disagree with the NRI Measures as drafted. Our reasons include:

- Managed burning is a lawful, regulated and evidence-supported tool in specific upland contexts. It contributes to fuel-load control, wildfire risk reduction, habitat diversity (heather age structure) and public safety. For example, there is a formal licensing regime introduced in 2021 that already restricts burning on deep peat in protected sites, and all burning is limited by season and subject to consent on SSSIs. The existence of this regime shows that government policy has targeted the most sensitive sites, but has *not* banned burning outright elsewhere. Defra acknowledge that controlled burning does have a role.

We do not accept any presumption in the Plan that controlled burning on peat is categorically ‘bad’ and must be eliminated. Those seeking to eliminate burning must provide evidence of harm at least as compelling as the evidence that currently supports its controlled use. To date, the science on burning is mixed. Natural England’s 2025 evidence review concluded that repeated burning on deep peat may harm peat formation, but other researchers have called for “*informed, unbiased debate*” on the role of fire in UK peatlands rather than one-sided conclusions (Davies et al 2016). In the face of this, an absolutist measure is not justified.

- The Measures fail to explain how fuel continuity and wildfire exposure will be managed if preventative burning is removed. This is a critical omission with direct public safety implications. The draft Plan places strong emphasis on ending burning (Action NRIg) and relegating it to a ‘last resort’ (NRIe), yet simultaneously relies on effective wildfire mitigation (NRIh). It does not reconcile this tension.

Without robust alternative mechanisms in place, there is a high likelihood that wildfire exposure will increase in the short to medium term. As one example, if large swathes of heather moor are re-wetted to raise water tables (a climate goal) but vegetation isn't also managed (through cutting or occasional burn) and nobody monitors fuel buildup, we could inadvertently create a tinderbox of dry vegetation in hotter summers. Even proponents of rewetting acknowledge that *"withdrawal of management... presents an increased wildfire risk, which will require an action plan to manage this period of transition"* (IUCN Peatland Programme, 2025). Yet the Plan provides no such action plan. It doesn't say who will remove or break up the accumulating fuels, how emergency access will be maintained over wetter ground, or how Fire & Rescue Services will be involved. Simply assuming that blocking drains or planting sphagnum will solve fire risk is dangerous.

- While the Measures mention developing wildfire management plans, they lack specifics on fuel management, firefighting infrastructure, or roles and responsibilities during the transition away from burning. Key questions are unanswered: How will fuel loads be assessed and reduced across tens of thousands of acres? Who will do that work and with what funding? What if cutting and rewetting prove insufficient or impractical in some areas? How will the limited capacity of local Fire & Rescue (who are generally not resourced for large wildfires) be accounted for? Will there be firebreak creation (and if so, who maintains them)? The Plan should treat wildfire risk *'as a distinct climate risk'* on a par with flooding. It requires explicit measures like strategic firebreaks, training local fire teams, providing firefighting water sources etc. not just hoping wetter peat won't burn. Currently, wildfire is addressed only indirectly. This is a serious imbalance.
- Public safety considerations go beyond wildfire alone. Estate infrastructure and staff presence (gamekeepers, rangers) provide first response to many incidents. These include lost hikers, accidents, wildfire fires etc. Maintained tracks and access points are required to allow emergency services to reach remote areas quickly. Yet the NRI Measures do not acknowledge these functions. If policies inadvertently reduce the number of people on the ground (for instance, by making traditional management economically unviable) they will also reduce the human capacity to spot and tackle problems early. The Plan should explicitly recognize that a well-managed, lived-in landscape is safer and more resilient than an abandoned one.
- The Plan also lacks explicit recognition of biosecurity and disease risks that can accompany certain changes. Increased public access or large-scale habitat interventions (tree planting, rewetting pools) can elevate risks of livestock diseases, wildlife disease (eg. avian influenza in wetlands) invasive species spread and tick-borne illness for both humans and animals. These are real risks that land managers think about daily. NRI should incorporate measures to address such issues (eg. guidance on disinfecting equipment moving between sites, or managing deer to prevent overpopulation).
- The references to gamebird releasing, predator control and medicated grit in NRI are presented in a negative or cautionary tone without providing clarity or acknowledging their context. We support the lawful, responsible use of these practices. They are integral to current moorland management. For instance, medicated grit (for grouse) is essentially a veterinary intervention to reduce parasite loads. It is already regulated by veterinary and environmental regulations. Predator control is conducted under general licences for conserving ground-nesting birds or protecting livestock. These are not free-for-alls. This work is part of a controlled framework. The Plan, however, lists them in a way that could be read as problems to be solved, without stating what standard it expects or how it will judge

success. This ambiguous, one-sided framing creates an implied stigma around lawful practices and risks treating compliant land managers as suspects by default. That is unacceptable.

Any reference in the Plan to these practices must be neutral, evidence-based, and linked to outcomes. For example, instead of 'reduce gamebird releasing,' a balanced measure would be 'ensure any gamebird releasing is sustainable and in line with best practice, with monitoring of impacts on vegetation and prey species.' Likewise, rather than implying predator control is undesirable, say 'work with land managers to ensure predator control is targeted, humane, and supports species recovery where needed.'

- We recommend the Plan explicitly strengthen balance and clarity regarding gamebird management and related practices. It should recognize the lawful, regulated role of gamebird releasing within upland management (alongside its potential risks), clearly distinguish responsible practice from genuinely harmful conduct (ie. not paint all shooting interests with one brush) and acknowledge both benefits and trade-offs of these practices. This will improve stakeholder confidence and align the Plan with national guidance that calls for working collaboratively with land managers, rather than casting longstanding practices in a presumptively negative light. As context, Parliament's recent review of environmental regulation highlighted the need for regulators to shed 'risk-averse' cultures and work more strategically with those managing the land (NAO 2026). Demonising legitimate activities would be a step backward.

In conclusion, we find NRI's measures as drafted to be impractical, unbalanced and potentially dangerous if implemented without change. We urge a fundamental rewrite focusing on an integrated fire-risk and peatland management strategy, developed in partnership with moorland managers. The final Plan should commit to an adaptive management approach. It should try new techniques, monitor them rigorously (for peat condition and wildfire metrics) involve keepers and farmers in the process. The Plan should be ready to adjust if outcomes aren't as expected. Only through such a realistic, evidence-led approach will the peatland and heathland goals be credible and achievable.

## **NATURE RECOVERY – WADING BIRDS (NR2)**

### **I2a. To what extent do you agree with the Nature Recovery NR2 Wading Birds Outcome, in general?**

☒ Neither agree nor disagree

### **I2b. Why do you feel this way?**

The Association wholeheartedly supports the objective of halting the decline and supporting recovery of upland wading birds (such as curlew, lapwing, and golden plover). These species are iconic in the North Pennines and nationally important. Our caution lies not with the goal, but with how the Outcome is framed. We cannot accept an Outcome that implies a single preferred management philosophy to achieve wader recovery, when evidence demonstrates that multiple approaches (including traditional, active land management) have been effective.

In many upland contexts, wader conservation success has been delivered through active management. These have tailored grazing regimes to create the right sward structure, heterogeneous habitat mosaics through burning or cutting, predator control to improve nesting success etc. Peer-reviewed studies and conservation programs (eg. GWCT's upland wader research) have documented significant increases in wader productivity where predator control is in place and habitat is managed appropriately, compared to similar sites without those measures. The Plan should explicitly

acknowledge these proven approaches as core delivery mechanisms, not treat them as merely conditional or a 'last resort.'

We welcome that the Outcome aims to improve population resilience, breeding success and habitat condition for waders. These align with our own long-standing commitment to these birds. We particularly support the recognition of upland England's importance for species like curlew (the UK holds a large proportion of the world population). However, our agreement is qualified because of how the Outcome is worded. It should be evidence-led and management-neutral, meaning it shouldn't prejudge that one style of management (say, passive rewilding or removing livestock) is the only or best way.

Instead, it should state the result needed (more waders fledged, stable or increasing populations) and allow for any method that demonstrably works to be employed. The Outcome currently could be read as implying that 'new' or different management is needed for success, whereas in reality some estates already have stable or growing wader populations under current management.

Importantly, the Plan's narrative for NR2 should explicitly recognize predator-prey balance as an ecological factor. Ground-nesting waders are highly vulnerable to predation (by foxes, crows, mustelids etc.). This is especially so in the spring when adults, eggs and chicks are on the ground. Predator control by gamekeepers has been shown to significantly increase nest success for species like curlew and lapwing in uplands. Yet sometimes in policy discussions, predator control is mentioned only reluctantly. We urge that it is not framed as a necessary evil, but as one legitimate conservation tool among others, to be used where evidence supports it. For example, the Outcome might say 'Wader populations are recovering through habitat improvement and effective predator management (where needed).' This balanced framing ensures that those managing predators to protect waders are supported, not stigmatized.

In summary, we neither agree nor disagree with the NR2 Outcome as written. We support the intent but need the framing to be more inclusive of proven land management contributions. Recovery is not contingent on a single approach. Multiple pathways (grazing management, controlled burning for habitat mosaic, predator control, visitor management on breeding sites etc.) can all play a part. The Outcome should embrace that flexibility and signal partnership with those who have been delivering wader conservation on the ground. We stand ready to help with this, as many Moorland Association members have firsthand success stories (eg. estates where lapwing or curlew numbers have rebounded due to predator control and habitat work). Let's use all the tools in the toolbox to save these birds.

### **I2c. To what extent do you agree with the Nature Recovery NR2 Wading Birds Measures, in general?**

☒ Neither agree nor disagree

### **I2d. Why do you feel this way?**

While we support the intent of the NR2 Measures (more detailed actions for wader recovery), we see potential issues in how they are currently framed. They risk privileging certain approaches without sufficient recognition of existing management systems that are already delivering positive outcomes for waders.

As with other aspects of the Plan, any Measures implying change or new restrictions must be subject to the same evidential scrutiny as existing practices. There should be no assumption of harm by default for current management. For instance, if a measure suggests limiting heather burning on wet grass mosaics to create taller vegetation for curlew, it should only proceed if evidence shows current burning regimes are harming curlew productivity – and if an alternative is proven to benefit them. This symmetry of evidence builds trust among practitioners who might otherwise feel unfairly

targeted.

Our specific concerns include: the Measures may appear to favour specific intervention philosophies (e.g. “rewilding” or strict non-intervention in large areas) without adequately acknowledging the proven role of active moorland management such as:

**Habitat mosaics through burning or cutting:** Small patch burns or cuts create a mix of short and tall vegetation. Many waders (golden plover, lapwing) prefer a mosaic of shorter areas for nesting and nearby taller cover for chicks to hide. This heterogeneity is often achieved by rotational burning/grazing. A measure that discouraged all burning could inadvertently homogenize the habitat (e.g. all tall rank heather or grass) which is not ideal for these species.

**Sustainable grazing:** Light to moderate grazing by sheep or cattle can keep grass swards in the structurally optimal condition for nesting and feeding. Removing grazing entirely can lead to rank vegetation or scrub encroachment, reducing suitability for species like lapwing that need open, short turf. The Plan should ensure its measures do not universally push for grazing reductions without site-specific analysis (as also noted under the Grasslands section).

**Lawful predator control:** As discussed, controlling foxes, crows, etc. can dramatically improve breeding success. Measures should explicitly accommodate and encourage predator control efforts where evidence shows predation is limiting wader recovery. This might involve supporting keeper-led predator management or funding additional fox control in key curlew areas, etc., rather than ignoring the topic.

To be effective and credible, the NR2 Measures should recognize and integrate these existing management actions that are already benefiting waders. They should set clear evidence thresholds for any new proposed changes (for example, if suggesting fencing off an area to keep grazers out, demonstrate it won’t harm wader habitat quality). And they should avoid unintended undermining of the ecological or economic foundations currently supporting wader populations. For instance, if an estate’s income from shooting supports its predator control efforts that incidentally help waders, and a measure reduces that income without replacement, it could actually hurt waders. Joined-up thinking is required.

In summary, we neither agree nor disagree with the measures as drafted – they are well-intentioned but need adjustment. Any measure that implies curtailing a current practice should be held to the same standard of proof as those continuing current practice. The Plan’s wader recovery measures will be far more successful if they integrate and enhance ongoing efforts by land managers, rather than presuming that entirely new methods must replace what is already working. We suggest the final measures explicitly include working with farmers and gamekeepers on predator control and habitat management as key actions, supported by training or funding where needed. This collaborative approach will deliver results faster than starting from scratch.

## **NATURE RECOVERY – TREES & SCRUB (NR3)**

### **I3a. To what extent do you agree with the Nature Recovery NR3 Trees and Scrub Outcome, in general?**

☒ Disagree

### **I3b. Why do you feel this way?**

We do not agree with the NR3 Trees and Scrub Outcome as drafted. The way it is framed risks promoting a presumption in favour of tree and scrub expansion even in landscapes where openness is itself the priority habitat condition. Large areas of the North Pennines are internationally

important open habitats (blanket bog, heathland, upland wet grasslands) whose ecological value depends on the continued absence of extensive tree or scrub cover. These are not degraded landscapes awaiting woodland; they are, in their open state, exactly what we are trying to conserve. For example, blanket bog and heath are protected under UK law (SSSI) and international designations (SAC, SPA) with conservation objectives explicitly focused on maintaining open, treeless conditions. Encouraging widespread tree encroachment into such areas would conflict directly with those legal protections and obligations.

The Outcome needs to strike a much more nuanced balance. Of course, there are places in the AONB where more trees or scrub would be beneficial (native woodland in gills or cloughs, shelter belts around farms, riparian scrub to slow runoff etc.). But it should not imply that increasing tree cover is a universal good across the board. The current text, by emphasizing tree expansion, could be interpreted as treating moorlands as if they are lacking or in need of reforestation. That perspective is not supported by policy. England's Trees Action Plan (2021) and other strategies emphasize 'the right tree in the right place,' explicitly cautioning against planting on priority habitats like peat bogs or species-rich grasslands. We need the Outcome to reflect that landscape context is everything. Upland moors are not simply blank canvases for trees. They have their own native ecosystems which too many trees could harm (through drying peat, changing soil pH, or shading out specialist flora).

We also note the Plan's narrative reference to pheasants under NR3, which is oddly placed. It mentions gamebird releasing as a factor affecting tree establishment (presumably because pheasants can damage young trees or that woods are managed for shooting). However, the references are narrow and don't capture the wider reality. Gamebird management heavily influences how, where, and whether new woods are created on estates. For example, an estate may avoid planting trees near grouse moors (to prevent providing cover for foxes), or conversely may plant cover crops and woods for pheasants in lower areas. If the Plan is serious about trees and scrub, it should acknowledge that game management is not just a pressure - it's a context that any planting scheme must work within. Engaging with shoot managers and keepers will be essential to designing woodlands that don't inadvertently undermine game or wildlife management (eg. avoiding dense cover right next to release pens, or planning long-term maintenance for pens to avoid disease buildup in woods).

Our biggest concern is that poorly targeted tree and scrub expansion could actually harm existing conservation values and increase risks. Some specific risks: displacement of priority open-habitat species (merlin, golden plover, and other birds avoid afforested areas), increased continuous fuel loads leading to worse wildfires (a solid block of scrub or trees can carry fire further than a patchwork of moor and meadow), damage to peat soils from tree roots or drainage, undermining long-established land management systems that currently deliver biodiversity and carbon storage (like grazing or heather management). A 'more trees everywhere' mindset would be counterproductive. A more defensible Outcome would explicitly state that new tree or scrub establishment will be targeted to appropriate locations and will not compromise priority open habitats. It should require site-specific ecological justification for any proposals to transition open moor to woodland.

In practice, any significant woodland creation in this landscape *already* requires rigorous checks (Environmental Impact Assessment (EIA) for forestry, Habitat Regulations Assessment if near protected sites, etc.) which underscores that planting is not automatically beneficial or permissible. The Outcome should make clear that trees/scrub will only be encouraged in appropriate locations after careful evaluation, rather than setting a blanket presumption to plant. We suggest language like: 'In suitable locations (such as lower slopes, gills, or improved land), increase native tree and scrub cover to enhance biodiversity and natural flood management, while protecting open moorland habitats which are of high conservation value.'

In summary, we disagree with NR3 Outcome as worded. We support woodland creation in principle but only where it genuinely fits. We must avoid converting the wrong areas. The Outcome should champion 'the right tree in the right place' and explicitly exclude deep peat, heaths and species-rich open ground from tree-planting targets. It should also reference balancing multiple objectives (eg. not all carbon goals must be met by trees if peatland is a better carbon store in that area).

**I3c. To what extent do you agree with the Nature Recovery NR3 Trees and Scrub Measures, in general?**

☒ Strongly Disagree

**I3d. Why do you feel this way?**

We strongly disagree with the NR3 Measures as drafted. They are overly prescriptive and lack sufficient safeguards to ensure tree and scrub establishment is confined to appropriate locations and does not create long-term ecological, operational or financial liabilities.

Some issues to highlight:

- The Measures appear to push tree/scrub establishment without first delineating where it should or shouldn't happen. There is no clear spatial hierarchy given between areas suitable for planting and areas that are not. As noted, certain areas should be categorically off-limits to new woodland (eg. active blanket bog, upland heath, limestone grassland, or other habitats where trees would damage the existing value). The Measures should start by carving out those exclusions or at least requiring an ecological suitability test. Without that, there's a risk of well-meaning but harmful planting proposals.
- The Plan acknowledges pheasants in passing ('pheasants are a localized pressure on tree growth') but the Measures treat them superficially. The reality is that integrating new woods on estates with game shoots is complex. Estates must plan for fencing to protect young trees from deer (fences which can also snare wildlife or block access), consider ongoing maintenance (pheasant coverts often need understorey management, feeding rides etc.), and costs (woods don't generate income for decades, if ever). The Measures don't mention how these challenges will be met or funded. For example, if an estate is asked to establish 50ha of new woodland, who pays for the planting, the 10+ years of maintenance until canopy closes, the loss of grazing income on that land, and any impacts on shooting or farming operations? The document is silent on that.
- We are concerned about short-term planting projects that increase wildfire risk, damage soils, and ultimately transfer liabilities to land managers or the public. This is not a hypothetical. The UK has past examples of poorly-sited forestry that later needed costly removal (eg. planting on deep peat in Flow Country mid-20th century). Government policy now is more cautious, but the pressure to hit tree targets can lead to corner-cutting. The Plan should reinforce existing regulatory safeguards (like the need for EIAs for afforestation over certain sizes, which is in place) and best practices, not sidestep them. We would like it stated that any woodland creation will follow the UK Forestry Standard and all legal requirements. They should also be planned in consultation with stakeholders.
- The Measures currently lack detail on governance and long-term responsibility. For instance, if scrub is allowed to spread on common land, who is responsible for managing it if it becomes a wildfire hazard or if it begins to dry out peat? Or if trees are planted and then a disease like phytophthora or ash dieback takes hold, who handles that? Ambiguities here could discourage landowners from agreeing to projects, or worse, leave future problems.

We recommend that the Measures be reframed to require:



- (1) clear ecological justification and site-level assessment before any tree/scrub planting on semi-natural habitats;
- (2) alignment with existing land management plans and regulatory processes (eg. do not bypass the Forestry EIA process, instead use it as a tool to identify issues); and
- (3) defined long-term maintenance responsibilities and funding for new woodlands (eg. agreements that planting grants come with management payments for at least 10-20 years).

The Plan should explicitly state that open habitats will be protected and that tree-planting will target degraded or suitable sites like bracken-dominated slopes, conifer plantation diversification, or lower-quality grassland, not species-rich upland habitats.

Additionally, the Measures should recognize the vital role of active land management in maintaining habitat diversity and resilience. Uplands with a mix of open and wooded areas will still require grazing, cutting, controlled burning in some places, predator control, etc. The Plan should avoid messaging that once you plant trees you can walk away. In reality, a planted woodland might need thinning, invasive species control, ride mowing etc. Active management doesn't stop, it just changes form.

By aligning any tree-planting initiatives with existing legal processes and sound science, and by excluding ecologically inappropriate areas, the Plan can support well-sited woodland creation without undermining the openness and unique habitat value that define much of the North Pennines. We strongly urge revising NR3 measures along these lines, or we cannot support them.

## **NATURE RECOVERY – RIVERS & STREAMS (NR4)**

### **I4a. To what extent do you agree with the Nature Recovery NR4 Rivers and Streams Outcome, in general?**

☒ Neither agree nor disagree

### **I4b. Why do you feel this way?**

We do not oppose the objective of improving river and stream health in the North Pennines. Clean, functioning watercourses are beneficial to biodiversity, water quality, and downstream communities. However, the Outcome's wording risks implying that reduced management or uniform interventions will automatically deliver improvements (particularly in headwaters, where streams are tightly interwoven with long-established land management systems).

Many moorland estates already deliver public benefits in river catchments through active management. For example, over the past decades estates have been blocking grips (drains) to re-wet bogs and slow runoff, managing grazing to reduce bank erosion, controlling pollution by careful use of medicated grit, and maintaining infrastructure like farm bridges and ford crossings that also serve as access for monitoring and repairs. These activities (often funded privately via farming and game management) play a direct role in maintaining access, hydrological function and the capacity for rapid response to incidents (like spotting and fixing an eroding peat gully or addressing a localized pollution source). This positive contribution by land managers should be explicitly recognized in the Outcome, rather than implying that current management is an obstacle.

We caution that river and stream 'restoration' must be planned in tandem with wildfire risk management, emergency access, and the operational realities of a working landscape. Hydrological change is not risk-free. For instance, if you re-meander a stream and re-wet the floodplain, you might inadvertently waterlog a crucial track or make a large area impassable to vehicles that are needed for firefighting or shepherding. Or if you block every drain on a hillside to raise water tables, in a wet

year water might start sheeting off elsewhere or destabilize peat on slopes, or conversely in a drought the dry heather becomes continuous fuel with no dry breaks. The point is, actions in water can have cascading effects on land. Thus, interventions shouldn't be pursued in isolation from their on-the-ground implications.

Therefore, we feel the Outcome should integrate ecological science with practical land-use knowledge. It's great to have a vision of streams with natural profiles, woody debris, healthy fish, etc. but it must be meshed with how the land around them is used. A collaborative approach (involving farmers, gamekeepers, anglers etc.) will yield better long-term results than an imposed blueprint. The Outcome currently is acceptable in principle, but its supporting text should be careful not to imply that simply letting nature take its course in rivers (eg. no maintenance, no drainage) is a panacea. We've seen from flood events that totally 'natural' rivers can still cause havoc if not managed in a cultural landscape.

In summary, we neither agree nor disagree because it depends on implementation. We suggest the Outcome explicitly state something along the lines of: *"Rivers and streams are restored toward a more natural function in ways compatible with upland land management and safety needs."* That would assure us that a balance will be struck.

#### **I4c. To what extent do you agree with the Nature Recovery NR4 Rivers and Streams Measures, in general?**

☒ Disagree

#### **I4d. Why do you feel this way?**

We cannot agree with the NR4 Measures as framed. As with other sections, the measures for rivers must be voluntary, evidence-led and aligned with existing land-management systems, rather than assuming reduced intervention or blanket constraints as the default pathway.

In upland headwaters, interventions like re-naturalizing channels, re-profiling banks, adding woody debris, or rewetting floodplains can have unintended consequences. These could include: drying out adjacent moorland if water is redirected away from some bogs; conversely, waterlogging and making access difficult for farm or emergency vehicles; increased wildfire risk if vegetation patterns change (for instance, creating large stands of reeds or tussocks that can carry fire). Right now, such risks are mitigated by active estate management, regular staff presence on the land, and maintained infrastructure (drains, ditches, bridges). If a measure were to, say, fill in all ditches, one might slow water, but also might create stagnant pools that breed midges or release methane, and you might lose the access route that ditch provided in dry weather. These trade-offs need careful thought.

The Measures as drafted lack clarity on governance, proportionality and long-term responsibility for engineered changes. If a third-party project re-engineers a stream (removes a weir, plugs drains, etc.), who ensures it doesn't blow out in a storm? Who maintains any structures installed (like leaky dams)? There should be an emphasis that any hard interventions in watercourses will follow due regulatory process (eg. land drainage consent or environmental permits from the Environment Agency where needed) and that liability and maintenance responsibilities are agreed. We wouldn't want a scenario where a project team installs features and leaves and the landowner is left with something that might fail or need upkeep without support.

We recommend the Measures include requirements for rigorous site-specific assessment, clear evidence thresholds, and alignment with farm business plans and regulatory requirements before significant river works are undertaken. In plainer terms: don't assume every beck needs the same treatment. Each case should be studied, use data (on flow, flood, species present) and consult those living there. Ensure that any measure (like creating buffer strips or scrapes) is done cooperatively with land managers, so it doesn't inadvertently harm their livelihood or other environmental values.

Collaboration is essential. We'd like to see something about working with farmers on win-win actions. For example, restoring a natural meander in a stream could go hand in hand with providing an alternate hardened crossing for livestock or ATV so that both habitat and farming benefit. Or tree planting along a beck (to cool the water for trout) could be paired with fencing that is installed with farmer input so that it doesn't obstruct stock movement elsewhere and includes gated access for management.

Finally, the Measures should explicitly mention avoiding one-dimensional targets. We've seen targets like 'X kilometers of river re-meandered' which don't account for context. It's more important to achieve function (improved water quality, stable banks, better invertebrate life) than to hit a metric that might not suit every location.

In conclusion, we disagree as written but could support NR4 measures that commit to careful, evidence-based river improvements done with land managers. We want healthy streams as much as anyone. We also know from experience that if you ignore local knowledge or practical needs, projects can fail or cause resentment. Let's aim for measures that everyone can get behind and that genuinely enhance rivers and the broader landscape's resilience.

## **NATURE RECOVERY – GRASSLANDS (NR5)**

### **I 5a. To what extent do you agree with the Nature Recovery NR5 Grasslands Outcome, in general?**

☒ Neither agree nor disagree

### **I 5b. Why do you feel this way?**

We support the objective of maintaining and enhancing grassland biodiversity. Species-rich meadows and pastures are valuable and beautiful parts of the upland mosaic. However, we are cautious because the NR5 Grasslands Outcome, as written, risks implying that reduced management or uniform interventions (like blanket destocking or cessation of grazing) will deliver improvement. It does not adequately recognizing that many upland grasslands are semi-natural systems sustained precisely through long-term active management.

Across the North Pennines, grasslands have developed under locally adapted regimes of grazing, cutting and nutrient management. Some are hay meadows cut annually. Others are rough pastures lightly grazed year-round whilst some are grazed in summer and rested in winter etc. Their plant species composition and structure (and associated insects and birds) often depend on continued, well-timed intervention. If management is withdrawn or drastically changed, these grasslands can quickly lose species diversity (eg. vigorous species like rank grasses or bracken take over).

For example, the famous upland hay meadows with orchids and wood cranesbill require annual mowing and aftermath grazing. If we stop cutting, they turn into rank, species-poor swards in a few years. Thus, the Outcome should avoid framing 'reduced grazing' as a universally desirable pathway. It should explicitly recognize the diversity of grassland types and the need for tailored management. In the draft text, we worry about phrases that might imply rewilding of grasslands is generally beneficial.

In reality, not all grasslands respond positively to reduced intervention. Some do, some don't. We would prefer phrasing that focuses on achieving the right management balance for each grassland type to maximize biodiversity.

So, we neither agree nor disagree with NR5 Outcome until it's clear that it embraces active

stewardship (like rotational grazing, meadow cutting, scrub control) as part of grassland conservation, rather than hinting at a one-size-fits-all reduction of activity.

**I5c. To what extent do you agree with the Nature Recovery NR5 Grasslands Measures, in general?**

☒ Neither agree nor disagree

**I5d. Why do you feel this way?**

We have reservations about the NR5 Grasslands Measures as currently framed. Several measures appear overly prescriptive and insufficiently sensitive to local variation in soils, altitude, climate and farming systems. This raises the risk of unintended ecological or economic consequences.

For instance, if a measure were to ‘reduce grazing pressure by 50% on all allotment commons,’ that might be fine on an overgrazed common but disastrous on another that’s already lightly grazed. This would lead to rank vegetation that smothers herbs and invites scrub invasion. Measures that imply change or new restrictions (like significant reductions in grazing, compulsory switch to hardy native breeds, conversion of pasture to scrub etc.) must be supported by **clear, site-specific evidence** and aligned with existing farm management and agri-environment schemes. Many farmers are already in environmental agreements, with carefully calibrated grazing plans. The Plan should complement those, not conflict.

We emphasize a few points:

- Substantially reducing or removing grazing is not an ecologically neutral action. If done without careful assessment, it can lead to rank vegetation, increased wildfire fuel continuity, scrub or bracken encroachment and even a loss of plant diversity (as competitive species dominate). It can also undermine farm viability (fewer livestock means less income, less manure for meadows, etc.). The Plan should not assume that ‘less grazing achieves better habitat’ in all cases. Many upland grasslands rely on the right level of grazing or cutting to maintain their ecological value. For example, without grazing, a species-rich short sward might become a uniform tussock grassland with little biodiversity.
- The Measures should prioritize adaptive management and locally tailored solutions. Rather than a blanket prescription like ‘don’t graze from April to July,’ it could encourage working with farmers to adjust grazing timing on specific fields if ground-nesting birds are present, or trial leaving an uncut refuge strip in a meadow for insects. Fine-tuning beats broad-brush rules. It’s about how you graze or cut, not simply how much or little.
- Many upland farms are already part of agri-environment schemes that address grassland management (eg. species-rich meadow options, rough grazing management for birds etc.). The Plan’s measures should build on those successes and encourage uptake of new schemes. It should not layer conflicting rules that confuse farmers. For instance, if a farm is paid under a scheme to cut a meadow late (after 15 July) for seed, the Plan shouldn’t suggest cutting in June for other reasons. Consistency and clarity are key.
- Resourcing and advice must accompany any changes. If the Plan wants more late-cut meadows, is there a market for late hay or can farmers get support for that transition? If it suggests grazing with cattle instead of sheep in some areas for diversity, will there be help to secure hardy cattle and infrastructure for them? A measure should not just say “do X” without considering the farm-level feasibility.

Given these issues, we neither agree nor disagree for now. We would move towards agreement if the final Plan revises the measures to emphasize working with farmers and graziers to fine-tune management, rather than imposing rigid prescriptions. Encouraging demonstration farms, peer-to-peer learning (showing how certain grazing plans improved a meadow), offering flexibility (maybe some years you graze, some years you rest, depending on weather and observations). These are the ways to improve grasslands sustainably.

In conclusion, we support grassland enhancement, but it must be realistic and sustainable. The North Pennines' grasslands will thrive if we support those who manage them, recognize that one pasture is not like the next and avoid heavy-handed rules. We would like the Measures to explicitly state that adaptive, evidence-based approaches will be used, and that existing good stewardship will be supported, not undermined. With those changes, this section could go from something we're wary of to something we fully endorse.

## **NATURE RECOVERY – WETLANDS (NR6)**

### **I 6a. To what extent do you agree with the Nature Recovery NR6 Wetlands Outcome, in general?**

☒ Neither agree nor disagree

#### **I 6b. Why do you feel this way?**

We support the objective of maintaining and enhancing upland wetlands. These include mires, flushes, springs, valley bogs and wet meadows that are vital for biodiversity and water regulation. However, we caution that the NR6 Wetlands Outcome, as written, again risks implying that 're-wetting' or uniform intervention is always best, without recognizing that many upland wetland systems are currently sustained through active land management.

In the North Pennines, wetlands coexist with grazing, moorland management and other land uses. Many are semi-natural habitats that have been maintained by centuries of certain practices (like controlling drainage to retain just enough wetness, or cutting rushes to keep an open structure). Additionally, a lot of these wetlands are supported by private investment. For instance, estate-funded grip-blocking projects or fencing out stock at key springheads. Their ecological condition varies widely depending on local factors (soil, altitude, past management). Thus, the Outcome should avoid assuming a default 'hands-off' restoration approach is always best. In some cases, careful intervention (like periodic rush cutting, or creating small dams) yields better results than simply leaving it alone.

We need the Outcome to champion locally tailored, evidence-based approaches that work with existing management rather than displacing it. For example, if a farm has a wet pasture that's in good condition due to light summer grazing, the plan might help enhance it by adding scrapes or tussocky areas. However, it shouldn't insist the pasture be taken out of grazing entirely (which could lead to rank growth and loss of species like marsh marigold that need some disturbance).

Right now, the Outcome wording seems a bit one-dimensional about 'restore wetlands.' We don't disagree with the goal, but we want it clearly stated that restoration will be done in partnership with land managers, and that sometimes the status quo is good (ie. some wetlands just need protection, not drastic change).

Therefore, we neither agree nor disagree until we see that nuance. If clarified, we would support the Outcome.

### **I 6c. To what extent do you agree with the Nature Recovery NR6 Wetlands Measures, in general?**

☒ Disagree

#### **I 6d. Why do you feel this way?**

We do not agree with the NR6 Wetlands Measures as framed. Measures relating to wetland creation, re-wetting or hydrological modification must be voluntary, evidence-led and carefully assessed for their practical implications (on wildfire risk, access, peat stability and long-term management responsibility).

Our concerns echo those in other sections:

- Capital works alone won't guarantee durable outcomes. Building a bund, damming a grip, or flooding an area might tick a box, but without sustained management and funding behind them, those interventions can fail or create new problems. For instance, dammed pools can become clogged with vegetation or erode around the edges if not tended. A newly flooded area might quickly get taken over by rank reeds unless grazed occasionally. The Plan should acknowledge that restoration is a process, not an event. There needs to be monitoring and maintenance. If a measure encourages creating new wetlands, it should equally emphasize securing resources and people to manage them long-term.
- We worry about unfunded future liabilities. If a grip is dammed under a short-term project and then the dams fail after heavy rain in 5 years, who fixes them? If a farmer is persuaded to allow part of a pasture to flood for a wetland, but then that area becomes unfarmable and their payment scheme ends after 10 years, what then? The measures should ensure that any wetland creation comes with agreements or funding for the future, or at least an exit strategy if things go awry.
- As mentioned before, wildfire risk and peat stability need to be considered. Raising water tables is generally good for peat, but if you create wet areas bordered by very dry areas, you might concentrate fuels. Also, a well-hydrated bog is less fire-prone, but if there are islands of dry vegetation within it, those could still burn intensely. A measure to 'rewet 100ha of bog' should include something about checking fuel continuity and having a vegetation management plan. Similarly, rapidly adding water to peat can sometimes cause slumping or failure if the peat was structurally degraded. A careful approach is needed (often trial plots first). The measures don't reflect these cautionary points.
- Legal checks: major hydrological changes on protected sites likely require regulatory scrutiny (eg. Habitat Regulations Assessment for a SAC, or consent from Natural England). The Plan should explicitly state it will work within those laws. We don't want well-intentioned activists damaging a SSSI by digging ponds without permission, for example. The Plan should be a model of doing things by the book, not an excuse to bypass it.

We advocate for measures that prioritize site-specific assessment, adaptive management, and alignment with existing land management plans, rather than blanket prescriptions. For example, if proposing to raise water tables on a peatland, the measure should require an assessment of how that will affect surrounding vegetation (will it increase heather elsewhere?), whether it necessitates follow-up actions like cutting ranks of old heather, and who will be responsible for installed structures (like peat dams or bunds) long-term. These details are vital.

On a positive note, we strongly support working with farmers and gamekeepers on a voluntary basis to restore wetlands. Many are keen to help if it doesn't ruin their farm. Offering incentives and technical help to, say, create a new scrape for lapwings in a rush pasture, or block a ditch that's no longer needed for grazing, will be welcomed. It's the heavy-handed large schemes that impose without collaboration that we oppose.

In conclusion, we disagree with NR6 measures until they are reframed to ensure wetland efforts are cooperative, well-planned, and legally sound. We recommend adding text like: 'All significant wetland projects will be developed with the agreement of land managers, based on sound science, and include plans for long-term management.' Also, explicitly noting that any required consents will be obtained. With those assurances, and a focus on enabling those who know the land to lead on wetland restoration (with support), we could back these measures.

## **NATURE RECOVERY – BIRDS OF PREY (NR7)**

**I 7a. To what extent do you agree with the Nature Recovery NR7 Birds of Prey Outcome, in general?**

☒ Disagree

**I 7b. Why do you feel this way?**

We fully support the goal of thriving birds of prey populations in the North Pennines. Raptors are a vital part of the ecosystem and a joy to see. However, we cannot agree to an Outcome framing that implies particular causes or land management conflicts without robust, site-specific evidence.

Moorland estates provide extensive suitable habitat that supports a wide range of raptor species. Many birds of prey (from merlins to short-eared owls) nest and hunt successfully on managed moors. The Outcome narrative should recognize the contribution of active upland management to habitat quality, prey availability and overall landscape resilience for raptors. It should not even subtly suggest that current management is fundamentally at odds with raptor success, unless evidence at local level shows a specific issue.

Delivery of raptor conservation must be evidence-led and avoid unsubstantiated assumptions about causation of any raptor shortfalls. We know raptor population dynamics are influenced by multiple factors: food supply (voles, small birds etc.), weather and climate (which affect breeding success), migratory patterns, possibly some illegal persecution in historical cases etc. If the Outcome implies that conflict with land managers is the primary reason raptors might be missing (which one could infer if not careful), that would alienate those very managers who are crucial to help improve things.

We believe partnership working with land managers is essential to achieve these outcomes. In particular, constructive engagement with estates. For example through participatory monitoring, nest protection schemes, or feeding diversion for raptors (like supplementary feeding for hen harriers to reduce predation on grouse chicks). This tends to yield far better results than outcomes that appear to assign blame by default. One can look at successful initiatives like the hen harrier brood management scheme where keepers and raptor workers collaborate. That model should be embraced.

We also emphasize that the Moorland Association and its members unequivocally support the legal protection of all birds of prey. Raptors are protected by law (Wildlife & Countryside Act 1981) and we all want to see them flourish. Our concerns are with tone and balance. The Outcome should not inadvertently assume wrongdoing or conflict where none is evidenced. A collaborative tone (inviting land managers to be part of the solution) would be far more effective and in keeping with best practice for human–wildlife coexistence. International best practice in resolving human-wildlife conflicts (whether tigers and farmers, or raptors and gamekeepers) consistently calls for engaging stakeholders and seeking win-win solutions, not casting one group as the villain. The Outcome text should reflect that.

In summary, we disagree with the current wording but not the ambition. We ask for a reframed Outcome that celebrates raptors and commits to increasing their numbers through cooperation and evidence-based actions and that avoids any implication of blame. Recognize that estates are key partners who can, for instance, help monitor nests, fund diversionary feeding, or create habitat, if approached constructively. With that change in framing, we would support the Outcome.

**I 7c. To what extent do you agree with the Nature Recovery NR7 Birds of Prey Measures, in general?**

☒ Disagree

**I 7d. Why do you feel this way?**

We do not agree with the NR7 Measures as drafted. Any monitoring and protection measures for birds of prey must be very carefully designed so as not to duplicate or extend enforcement regimes by implication.

First, it's important to note we already have a strict legal framework protecting raptors. Notably the Wildlife & Countryside Act 1981 (and subsequent amendments), which makes it illegal to kill or harm birds of prey or damage their nests, with enforcement by police and statutory agencies. The Moorland Association fully endorses these protections and works with authorities to encourage reporting and adherence. Therefore, additional measures in the Plan should complement the existing regime. For instance by facilitating cooperation and building trust, rather than introducing a parallel layer of suspicion or punitive oversight. We wouldn't want to see a local 'raptor police' duplicating what the police already do, or implied measures like posting wardens on estates unless there's specific need or evidence.

In general, we advocate collaborative, evidence-led approaches to secure long-term raptor conservation on moorland. That means working with land managers, not against them. For example, the Plan could measure how many estates join a voluntary raptor monitoring scheme, or commit to diversionary feeding if harriers nest on their land (backed by an agreed protocol). Measures of this kind build goodwill and achieve practical results.

While measures like monitoring nests, protecting nests from disturbance, and habitat improvement for prey are appropriate in principle, they must be proportionate, clearly evidenced and aligned with existing regulatory frameworks. The Plan's Measures should avoid any duplication of enforcement or oversight mechanisms that already exist. They should also avoid implying land management impacts (like 'disturbance') without robust local data. For instance, a measure that said 'independent monitoring of all grouse moors for raptor disturbance incidents' would be heavy-handed and unjustified if there's no evidence of a disturbance problem on those moors. Instead, a better measure might be 'annual collaborative surveys of key raptor species involving keepers, raptor groups and NE, to build shared data.'

Greater emphasis is needed on transparency and shared objectives rather than prescriptive or punitive approaches. We'd support measures such as: joint training workshops for gamekeepers and raptor fieldworkers on nest monitoring protocols; or equipment provision (like nest cameras that land managers and conservationists check together). These build a sense of common purpose.

For example, working with estates on schemes like supplementary feeding or diversionary feeding of certain raptors, where evidence supports it, could improve outcomes without confrontation. This has been trialled with hen harriers (feeding them to reduce grouse chick predation) and is promising if done cooperatively. The Plan could facilitate such schemes.

We also re-emphasise the need for consistent evidence standards and partnership-based monitoring. Avoid duplicative or accusatory regimes. This aligns with international best practice in addressing human-wildlife conflict: engage stakeholders and seek coexistence solutions rather than escalating conflict. Treat land managers as allies in raptor conservation, and they are more likely to become exactly that. An antagonistic approach (eg. implying every estate needs a surveillance because they can't be trusted) will breed resentment and non-cooperation.

In conclusion, we disagree with the measures as written but would support a revised suite that focuses on positive collaboration, robust monitoring with shared participation, and education/enforcement where truly needed based on evidence. The Plan should explicitly commit to working with shooting estates in a non-confrontational way. By doing so, the North Pennines can become a model of how to increase raptors while maintaining a healthy managed landscape, rather than a battleground of accusations. We stand ready to help with that mission.



## **CHAMPION SPECIES**

### **I8a. To what extent do you agree with the Nature Recovery Champion Species Outcome, in general?**

☒ Neither agree nor disagree

### **I8b. Why do you feel this way?**

We don't oppose the objective of conserving and celebrating certain 'champion' species (iconic flora or fauna that inspire the public) but we have concerns about how the Outcome is framed. We cannot agree with Outcomes that fail to recognize existing management contributions or that introduce prescriptive delivery assumptions without context.

The Moorland Association supports the principle of focusing on flagship species as a way to engage people with nature recovery. Many of our members take pride in species like the curlew, black grouse, or rare plants on their land. We see value in rallying around such champions. However, the Outcome as drafted is too high-level and lacks recognition of what is already being done. It reads somewhat like 'we will save species X and Y' without acknowledging that, in many cases, those species persist today precisely because of long-term moorland management efforts.

For example, if one champion species is the black grouse, it's important to note that black grouse in parts of the North Pennines benefit from predator control and habitat management on grouse moors (edge of moor woodlands, heather mosaic). If another champion is a plant like spring gentian (just hypothetically), its remaining sites might be where grazing has been moderate due to estate management. The Outcome should nod to these contributions, otherwise it can mislead the public into thinking nothing has been done and now the Authority is swooping in to 'save' the species.

Clearer links are needed between the desired outcomes for these species, the baseline conditions (current status/trends), and practical land-use implications. Simply stating ambitious outcomes (eg. 'champion species populations will double') without context or a realistic path can be misleading or set up failure. We'd like to see an acknowledgment like, 'Many champion species are currently present thanks to the efforts of land managers; building on this, we will... etc.'

We would like to see explicit recognition that many conservation successes to date are the result of active estate management. Omitting that context could lead to strategies that inadvertently undermine those same contributions. For instance, if a champion species is a ground-nesting bird that has thrived due to predator control, a strategy that ignored predator control (or worse, restricted it) could harm the very species we aim to champion.

Given these concerns, we neither agree nor disagree. Adjust the framing to be more inclusive of existing efforts and realistic in approach, and we would likely agree. We absolutely want champion species to thrive, but in a way that recognises, supports and aligns with existing successes on the ground.

### **I8c. To what extent do you agree with the Nature Recovery Champion Species Measures, in general?**

☒ Disagree

### **I8d. Why do you feel this way?**

We are not against the concept of identifying and focusing on champion species at all. But we

disagree with Measures that are written in a way that doesn't credit existing contributions or that seem to impose overly prescriptive actions without flexibility.

Several proposed measures risk being overly prescriptive and insufficiently evidence-led. We also see a lack of clarity on how the inevitable trade-offs between species, habitats, wildfire risk and land management will be resolved when promoting one champion over another. The reality is, focusing on one species can sometimes negatively affect another. For example, if one champion is a bird of prey and another champion is a wader, boosting the raptor might mean more predation on the wader. Or if a 'champion tree species' is promoted for planting, that might conflict with keeping an open habitat for a 'champion butterfly' let's say. The Measures don't currently spell out these nuances.

We are concerned that, as drafted, the Measures could result in rigid targets (like 'achieve X breeding pairs of species Y' or 'plant Z individuals of rare plant') without considering practical feasibility or unintended consequences. For instance, say the target is to introduce 100 rare plants to a site, if that site isn't right or if deer aren't controlled, they may all die, but a box gets ticked. Or setting a number of raptor nests without considering that some years voles crash and the birds naturally won't breed as much. It would be wiser to take a flexible, learning-based strategy: trial actions, monitor, involve local land managers (who know the ground intimately), and adjust accordingly.

Another missing aspect is recognition of site-specific conditions and existing lawful management that might affect these species positively or negatively. Measures should say something like 'review current management at key sites for each champion species and identify if changes are needed, or if current practice is beneficial and should be maintained.' This avoids assuming change is needed everywhere.

For example, if one champion species is a raptor that preys on another champion species, the Plan should clarify how it will balance those objectives. It's fine to have both as goals, but then you need a conflict resolution mechanism (maybe habitat zoning or feeding strategies). Or if a champion species is a tree to be planted, ensure doing so doesn't conflict with open habitat conservation needs of another champion.

In summary, we support the enthusiasm for key species, but the Plan needs to implement this via evidence, collaboration and realism, rather than fixed prescriptions. We recommend each champion species have a mini-strategy developed with stakeholders, outlining: current status, current management helping or harming it, actions to boost it (with responsible parties and funding) and how to monitor progress adaptively. Also a review should be built in. If after, say, 3 years a measure isn't working or is causing issues, be ready to change it.

Thus, we disagree with the Measures as they stand, but if they are rewritten in a more cooperative and flexible way, we could support them. We all want to see these special species thrive. Let's just make sure we do it in a smart way that brings everyone along.

## **DARK NIGHT SKIES**

### **I 9a. To what extent do you agree with the Dark Night Skies Outcome, in general?**

☒ Agree

### **I 9b. Why do you feel this way?**

The Moorland Association supports the protection of dark night skies as a core special quality of the North Pennines. Minimizing light pollution is a win-win: it preserves the sense of remoteness and

tranquillity, benefits nocturnal wildlife and even aids certain land management practices (for example, many gamekeepers prefer dark nights for predator control activities, and farmers sometimes need darkness for managing sheep breeding cycles). It also supports a burgeoning rural tourism niche (stargazing and 'astro-tourism') which brings visitors in a low-impact way.

The Outcome is sensible and broadly reflects existing good practice in upland areas, where minimal outdoor lighting is already typical. The wording seems proportionate. It seeks to prevent unnecessary new light pollution without impinging on safety or everyday rural life. We find that balance appropriate. In the North Pennines, most farms and hamlets have only the lighting they need, and people value the starry skies. We agree that should be maintained and enhanced where possible (eg. encouraging observatories or dark sky discovery sites).

In essence, we agree because this Outcome aligns with what is already a characteristic of the area and something we all value. It doesn't demand radical change, just conscious effort to keep the skies dark.

**19c. To what extent do you agree with the Dark Night Skies Measures, in general?**

☒ Neither agree nor disagree

**19d. Why do you feel this way?**

We support the intent of measures to reduce unnecessary lighting and light spill. Things like having design principles for any new lighting (pointing lights downward, using timers or motion sensors, choosing warm, low-intensity bulbs) are very sensible and can be helpful for planning decisions and for guiding landowners. However, we want to ensure the measures remain practical and flexible enough to accommodate land management, farming, and safety needs.

For instance, upland farms and shooting estates occasionally require outdoor lighting, for seasonal night work (like harvesting at night if weather demands, or controlling foxes), for security around buildings or pens, or for safety at key sites (farmyards, parking areas). The measures should acknowledge these needs. Implementation should avoid heavy-handed regulation or retrospective rules that burden residents or land managers. We would not support, for example, a rule that existing farm lights must all be replaced with a certain type by a deadline, or that no lighting at all can be used during certain hours (that could conflict with lambing season needs, etc.). Instead, an educational and incentive-based approach is better. Perhaps provide information or even small grants for motion-sensor lights or shielded fixtures.

We also note that certain traditional practices, like having a low light on outside a shoot lodge for a few hours when guests depart, or using vehicle headlights off-road occasionally, should not become points of contention. The measures should focus on unnecessary lighting (eg. leaving barn lights on all night when not needed, excessively floodlighting a monument etc.) not normal rural life.

Given this, we neither agree nor disagree yet. We mostly agree but want to see flexibility explicitly mentioned. The draft hints at this. It mentions needs for safety and typical rural operations, which we appreciate. It also suggests not mandating expensive retrofits or removal of existing lights. If those points are retained and perhaps strengthened, we'd be happy to agree fully.

In summary, we welcome the direction of travel on dark skies. Just ensure the measures have common-sense exemptions or processes for essential lighting, and lean on encouragement over strict control wherever possible. With that, local buy-in will be strong and we can keep the stars shining brightly above the North Pennines.

## **CULTURAL HERITAGE**

### **20a. To what extent do you agree with the Cultural Heritage CHI Knowledge about Heritage Outcome, in general?**

☒ Agree

### **20b. Why do you feel this way?**

We support the aim of improving knowledge and understanding of cultural heritage in the North Pennines. The Outcome rightly recognizes that heritage here isn't just about grand castles or museums, it's about lived and working landscapes and the traditions that shaped them. We particularly welcome the acknowledgement of intangible heritage (which is further developed under CH2). The skills, dialects and ways of life that are part of this landscape's story.

However, we noticed the draft Outcome text and narrative did not explicitly mention some key elements of our area's cultural heritage. Notably moorland estates, gamekeeping and driven grouse shooting. These are indeed part of the North Pennines' heritage, with centuries of history. Only referring to farming or mining history, for example, while omitting game management, gives an incomplete picture. We believe the Outcome would be stronger if it explicitly included these elements. Recognizing them is not endorsement or otherwise of the activity. It is simply factual that grouse shooting has been a cultural and economic part of the region since at least the 19th century, and gamekeepers' lore and skills have been passed down through generations here.

Including these practices as part of the heritage achieves several points. It improves balance, showing we're not cherry-picking which past to celebrate. It builds trust with the communities involved (they see their story acknowledged) and it strengthens the Plan's legal robustness by demonstrating it considered all facets of heritage and isn't biased against one (important if ever challenged). It's worth noting that the statutory purpose of AONBs includes consideration of cultural heritage and government guidance encourages involving local stakeholders in defining that heritage. In short, moorland estate ownership and management, upland gamekeeping and grouse shooting are part of the living cultural heritage of this place. They are ongoing traditions, not relics. They have shaped the landscape (eg. heather burning for grouse is as much a cultural practice as an ecological one) and the way of life (local shows, game fairs etc.). The Plan should explicitly recognise them as such.

That said, overall the Outcome's intent is good and we agree with it. We just request those additions for completeness and fairness. With that, this Outcome will highlight the full richness of North Pennines heritage.

### **20c. To what extent do you agree with the Cultural Heritage CHI Knowledge about Heritage Measures, in general?**

☒ Agree

### **20d. Why do you feel this way?**

We broadly support the proposed Measures for CHI. They encourage learning, engagement and a shared understanding of cultural heritage, which is very positive. Initiatives such as research projects, oral history recording, education programs and heritage skills training can all help deepen appreciation of the North Pennines' heritage. These are the kinds of measures that build bridges between generations and between communities and visitors.

We do think the Measures would be stronger if they explicitly recognized land managers and gamekeepers as holders of cultural heritage knowledge, not only academic historians or long-time local families. The people actively managing the moorland day-to-day often possess detailed local

knowledge of traditions, place names, land uses and wildlife that has been passed down. For example, a head keeper might know the lineage of each grouse beat and the stories behind their names. A farmer might have unique knowledge of local weather lore or old gatherings. These are rich veins of heritage information.

So, in practical terms, when implementing these measures (like oral histories or exhibitions), involve estate staff or shoot operators or wardens. Invite them to share their stories too, not just the 'usual' historical accounts. That inclusion will improve confidence among those managing the landscape. They will then see that 'heritage' isn't just about archaeology or the distant past, but also about them. It makes them more likely to engage with and support these projects.

We already see many land managers keen to tell their story (eg. estate open days showing heritage skills, or farmers participating in local history books). The Plan can boost this.

In summary, we agree with CHI measures and suggest a small tweak; explicitly include current land managers in the heritage knowledge-sharing. With that, these measures will not only educate the public, but also validate those who are part of that heritage today, making them enthusiastic partners.

### **21a. To what extent do you agree with the Cultural Heritage CH2 Intangible Heritage Outcome, in general?**

☒ Agree

### **21b. Why do you feel this way?**

We support the recognition of intangible heritage in principle. Upland culture isn't just about buildings or artifacts. It's also about skills, traditions and knowledge passed between generations. This Outcome emphasizes exactly that, which is very welcome. It aligns with the reality that this landscape is actively shaped by people over time - not just in the past, but still today. So focusing on keeping those chains of knowledge alive is smart for cultural continuity.

However, as mentioned under CHI, the Outcome would be stronger if it explicitly recognized moorland estates, gamekeeping and associated land management as living intangible heritage. At present, the draft seems to focus on community memories and folklore but doesn't clearly mention professional land-use skills and traditions. We consider practices like managing a grouse moor or an upland sheep farm, the tradition of coordinated grouse drives or the concept of hefted flocks, the craft of drystone walling or heather burning – all these are intangible cultural heritage as much as, say, traditional music or local legends.

Including these would round out the picture. It ensures the Outcome resonates with those who actually carry that heritage forward (gamekeepers, farmers, craftspeople). Otherwise, intangible heritage might be interpreted narrowly as just oral history and folklore. The Plan should explicitly mention those land management traditions so they are valued on par with, say, mining songs or lead mining lore.

With that addition, we fully agree with the Outcome. It's encouraging that the Plan wants to celebrate not just 'dead' heritage but the living skills and knowledge that define the North Pennines.

### **21c. To what extent do you agree with the Cultural Heritage CH2 Intangible Heritage Measures, in general?**

☒ Agree

### **21d. Why do you feel this way?**

The Measures are broadly appropriate and proportionate to celebrate and sustain intangible heritage. They talk about documentation (like recording oral histories), raising awareness (perhaps events, storytelling), and facilitating the transfer of knowledge between generations (apprenticeships, skill workshops). All of this aligns with long-term stewardship. If young people learn the old skills, the cultural landscape continues.

We just want to ensure the Measures don't focus solely on community narratives or volunteer activity while neglecting the professional land managers and estate workers who are key holders of intangible heritage. For example, a 70-year-old gamekeeper with decades of experience carries a wealth of knowledge about wildlife patterns, local remedies and landscape history. Similarly, a peatland restoration contractor might have specialist skills (like how to encourage sphagnum growth) that are new heritage in the making.

These individuals and their know-how should be included in efforts like education programmes or heritage skill registers. If we have a heritage skills workshop, invite the keeper to demonstrate heather burning technique or the farmer to show sheepdog handling – not just the craft demonstrations. By clearly including the land management community, the measures will be more balanced and build trust. It signals that 'intangible heritage' isn't just the domain of museums or hobby groups, but also embedded in working practices today.

Such inclusion fosters greater collaboration and mutual respect between conservation bodies and land managers, which benefits everyone.

So, we agree with the measures and simply advise an explicit mention or emphasis that current land management skills are part of intangible heritage to be documented and passed on. With that, these measures will ensure the living heritage thrives alongside the natural landscape.

### **22a. To what extent do you agree with the Cultural Heritage CH3 Physical Features Outcome, in general?**

☒ Agree

### **22b. Why do you feel this way?**

We broadly support the CH3 Physical Features Outcome. It focuses on conserving historic buildings, archaeological features, traditional field boundaries (like dry-stone walls) and field patterns. All of which are indeed important and welcome. Many of these physical heritage features survive today only because they are actively maintained through ongoing land management. For instance, estate owners and farmers routinely repair walls, maintain old barns, manage archaeological sites (often at their own cost) as part of their stewardship.

It would strengthen the Outcome text to explicitly acknowledge this ongoing stewardship. A phrasing that credits land managers for keeping these features intact would better reflect reality and encourage continued care. Something like: 'These features are conserved not only as relics of the past but through the active efforts of today's land managers.' This kind of statement helps ensure those stakeholders feel their efforts are valued. This in turn motivates them to keep doing it.

Overall the Outcome is good. It aligns with what we all want: keep the character of stone walls, barns, bridges, mine ruins, etc. Because it is well-aligned with existing practices (most want to conserve these anyway), we agree. With a minor tweak to credit ongoing efforts, it would be even better, but our agreement stands.

**22c. To what extent do you agree with the Cultural Heritage CH3 Physical Features Measures, in general?**

☒ Agree

**22d. Why do you feel this way?**

We support the intent of CH3 Measures. Emphasizing protection, repair, and sensitive adaptation of heritage features is very welcome. As noted, many physical heritage features (walls, farm buildings, shooting lodges, tracks, bridges, archaeological sites) depend on routine management. Estates and farms do much of this work year in, year out. Often it is done so unsung. The measures rightly encourage continuing that care and making use of traditional skills.

Our main note is that the Measures should ensure they support active maintenance, not unintentionally constrain it. For example, while it's important to have guidelines for repairing a listed building or ancient monument, those guidelines should be practical and not overly bureaucratic. If not owners might be deterred from doing repairs. Similarly, if an old track or bridge needs upgrading for safety, the measures should allow for sensitive improvement rather than a blanket 'freeze it as-is' approach. We just seek clarity that preserving heritage doesn't mean fossilising it to the point it can't be used or maintained.

Perhaps add a line in the Measures such as 'Work with owners to ensure heritage features are maintained in use where possible, with practical guidance that facilitates upkeep.' This way, land managers know the aim is to help them, not create more red tape.

To illustrate, if a manager has a 200-year-old barn that needs a new roof to stay standing, they shouldn't be tied up for years in consent because of heritage. Instead, they should get guidance on using traditional-looking materials and get on with it. Or if a stone track from 1850 is now the only way to reach a hill farm with modern machinery, perhaps reinforcing it discreetly is better than letting it deteriorate and losing access (and the track).

We support the draft hints at this practical side. It mentions not creating obstacles or costs. That sentiment must carry through in implementation.

In summary, we agree with conserving physical heritage. We simply stress that the Plan's measures should help those who are actually doing the conserving, rather than create new obstacles or costs for them. With that perspective kept in mind, these measures will be effective and welcomed by the community.

**ACCESS & ENGAGEMENT (AE1–AE5)**

**23a. To what extent do you agree with the Access and Engagement AE1 Accessibility Outcome, in general?**

☒ Disagree

**23b. Why do you feel this way?**

We do not oppose the general objectives of increasing public engagement with the landscape. Indeed, many of our members already facilitate public enjoyment (through permitted access, education days etc.). However, we cannot agree to an Outcome that proposes increased access pressure without explicit safeguards for land management, biosecurity, wildfire risk, and public safety.

Improved access can certainly enhance public understanding and enjoyment of the North Pennines. We want people to appreciate this place. But access must be proportionate, well-managed and

compatible with conservation and with a working moorland. The Outcome should clearly recognize that active land management (by gamekeepers, farmers, rangers etc.) underpins much of the landscape and wildlife that visitors come to enjoy. If visitors love seeing a curlew, they might not realise it's there largely because keepers control predators. If they enjoy a clear footpath, that may be because the estate maintains it. A good Outcome would acknowledge these contributions so that increased access is framed as being enabled by ongoing management.

Crucially, increased access comes with responsibilities and potential impacts. The Outcome should explicitly mention the need to manage that access. The Countryside Code exists for a reason. By law, open access land under the CROW Act 2000 has provisions to restrict access for land management or safety (eg. during high fire risk, or for land restoration) these are vital tools. The Plan's Outcome should acknowledge and uphold these legal safeguards, not encourage 'access at any cost.' For example, Section 22 of CROW allows temporary closures for fire prevention. That is part of responsible access. We'd like to see the Outcome state something like 'Increased access will be promoted in a responsible way, educating visitors and using legal powers where needed to protect the land and public'.

Without equal emphasis on responsible access, an Outcome solely pushing for more access is one-sided. The Plan must emphasize the management side: directing visitors to appropriate routes, providing information, preventing harmful activities (off-road driving, wild camping fires, littering). Otherwise, we set the stage for conflict and damage.

In summary, we disagree with an access Outcome that doesn't equally highlight the need for responsible access and necessary controls. Access is not an unalloyed good. It's something to balance with other factors. With stronger wording on this, we could support it.

### **23c. To what extent do you agree with the Access and Engagement AEI Accessibility Measures, in general?**

☒ Disagree

### **23d. Why do you feel this way?**

We have significant concerns with the AEI Measures as drafted. They seem to talk about creating new access or infrastructure (trails, facilities) but say little about who will monitor, maintain and police this access long-term. Increased access brings increased responsibility, cost and liability. The Measures must explicitly recognize the role of estates and land managers in managing these risks. They must not create new burdens by default.

As it stands, if more walkers and cyclists are encouraged, someone has to repair the paths, empty the bins (if any), address any safety issues etc. It often ends up falling to the landowner if not clearly arranged otherwise. The Plan should not assume land managers can simply absorb extra work or insurance risk.

The Measures should place much stronger emphasis on responsible access, clear governance and proper resourcing. They should note, for example, that many existing access routes, footbridges, stiles (even the quality of the landscape experience itself) are the result of ongoing private investment and management. If a new route is created, is there funding for its upkeep? Who ensures visitors stick to it and not wander onto a sensitive bog? These details matter.

We also worry about unintended impacts on wildlife and habitats. Unlimited access in breeding season can disturb ground-nesting birds. Unmanaged camping or fires can cause wildfires or litter. Dogs off leads can harm livestock or wildlife. The measures should explicitly address these issues. They could perhaps do this through seasonal diversions of routes, or requiring dogs on leads near



sheep or during bird breeding seasons (already law on open access land Feb-July for dogs, but few know it).

Visitor safety and emergency access is another issue. Managed estates currently play a huge role in mitigating these risks: keep fire beaters available, staff often respond first to wildfires, maintain tracks for emergency vehicles, control bracken (ticks vector). If access increases, so do incidents (lost hikers, wildfires, accidents). The Plan's measures should acknowledge that and ensure emergency services and land managers are prepared and involved in planning.

Finally, the Plan must not externalize costs or liabilities of increased access onto land managers by default. Right now, estates provide a lot voluntarily: car parks, informal ranger presence, rescue assistance etc., usually at private cost. If the Plan wants more, it should come with support (financial or in-kind) or at least consent. We'd resist any implication that because it's an AONB, landowners are obliged to allow unlimited access beyond what the law already provides. Public authorities have statutory mechanisms (like CROW restrictions for safety/land management). They should be used when needed.

In summary, we disagree with AEI measures until they explicitly incorporate safeguards and support mechanisms. Words we'd like added: responsible access (educate visitors on the Code), funding for maintenance of new access, partnership with landowners on where and how access is expanded and clarity on using legal closures when needed (fire risk days etc.). Without these, the measures risk good intent but poor execution, possibly harming both the landscape and local goodwill.

**24a. To what extent do you agree with the Access and Engagement AE2 Providing a Welcome Outcome, in general?**

☒ Disagree

**24b. Why do you feel this way?**

As with AEI, we do not oppose encouraging a welcoming environment for visitors and residents. Land managers already play a key role in providing a welcome. Many estates permit informal access, host educational visits, maintain signs or bothies that assist visitors. We broadly agree the North Pennines should be friendly and accessible to those who come to appreciate it.

However, we cannot agree to an Outcome that envisions increasing visitor numbers or facilities without simultaneously stressing the need for safety, land management needs and environmental protection. A 'welcome' should not come at the expense of the landscape or those who care for it daily.

It's important the Outcome recognizes existing contributions of land managers in providing a welcome. For example, some estates maintain parking areas at trailheads or allow birdwatchers to use estate roads. Others have information boards about local wildlife, whilst others run open days. The Outcome should acknowledge that and build on what is already being done rather than duplicating or ignoring it.

Also, any 'welcome' must be balanced with managing visitor impacts. Encouraging more people to wander off footpaths in sensitive areas, for instance, would be counterproductive (trampling habitat, disturbing birds). A truly welcoming environment is one where visitors enjoy themselves safely and responsibly, and where land managers are partners in providing that experience, not sidelined.

Because the draft Outcome didn't make those balances explicit, we disagree as written. If language about responsible enjoyment and partnership in delivery were included, we would be likely to support it.

**24c. To what extent do you agree with the Access and Engagement AE2 Providing a Welcome Measures, in general?**

☒ Disagree

**24d. Why do you feel this way?**

We do not agree with the AE2 Measures as drafted. Similar to AE1, increased efforts to provide a 'welcome' come with increased responsibility, cost, and potential liability. The measures must explicitly recognize the role of estates in managing these risks and not default extra burdens onto them.

For example, proposals to create additional car parks, campsites, or interpretation centres need to consider who will operate and maintain them. Often it ends up being local landowners or communities, who must be consulted and compensated if necessary. We can't just put a car park on private land without arrangement and expect the landowner to manage litter or resurfacing. The measures should make clear that any new facility will have an agreed management plan (maybe the AONB unit takes it on, or a community group etc.), not just assume it happens.

We support the spirit behind many measures: improving signage, visitor information, maybe welcome packs or others services. But these should be applied flexibly and proportionately. And they should explicitly recognize that many 'welcome' functions (like helping lost walkers, maintaining attractive scenery along roads, giving directions) are already done quietly by landowners and estates. New initiatives should complement these, not act like nothing is currently done.

Another concern: avoid creating new burdens or expectations that could undermine land management or conservation. For example, if a measure said 'every estate should host an open day annually' that sounds nice but some might not have capacity, and forcing it could detract from core duties or biosecurity (lots of visitors can bring disease on farms etc.). Or requiring estates to keep toilets open, etc. It needs to be practical.

In summary, we welcome making the area more inviting, but it must be done in partnership with those who manage the land and with careful thought to resources. A poorly supported 'welcome' could backfire (derelict facilities, resentment). Whereas a collaborative, realistic approach will succeed.

Given the lack of those assurances in the current text, we disagree. We suggest adding that any new 'welcome' features will be co-designed with landowners, with clarity on who provides upkeep, and ideally voluntary rather than mandated. With those changes, we could agree.

**25a. To what extent do you agree with the Access and Engagement AE3 Stories and information Outcome, in general?**

☒ Disagree

**25b. Why do you feel this way?**

We do not oppose improving how the stories and information about the landscape are shared. In fact, we strongly support better public understanding of the North Pennines (including its natural and cultural aspects). Telling the story of this landscape is a great idea. However, as with other AE outcomes, we cannot agree if it might increase visitor pressure or expectations without safeguards (land management, safety etc. mentioned previously).

Also critically, the story must be accurate and balanced. If 'telling the story' devolves into a narrative that romanticizes wilderness and omits human management, it could mislead visitors and even foster

antagonism. For example, if information boards implied moorlands would be paradise if only farming and shooting stopped, that's not only biased but could encourage trespass or vandalism by some visitors. We need the narrative to reflect the full range of people and practices that shape the landscape (including moorland estates, gamekeeping, farming, mining history, conservation efforts, community life etc). Balanced storytelling builds understanding and trust. Conversely, one-sided storytelling can create division.

Thus, we disagree to the extent the Outcome might simplify or skew the narrative. It should explicitly commit to balance and inclusivity (eg. 'Interpretation will present multiple perspectives including those of land managers').

**25c. To what extent do you agree with the Access and Engagement AE3 Stories and information Measures, in general?**

☒ Disagree

**25d. Why do you feel this way?**

We cannot agree with the Measures as currently framed. Again, any measures to increase outreach and information must recognize that increased promotion can draw more visitors, which brings increased responsibility, cost and liability. The measures must explicitly acknowledge the role of estates in managing these risks and not create burdens by default.

For example, if a measure is 'promote five new driving routes with storyboards' that could draw many more tourists to certain sites. Great for education, but if parking isn't planned, it'll be the nearest farmer's gateway that gets blocked with cars. Litter might increase at scenic stops. Someone has to manage that. This might fall on parish councils or landowners if not arranged. So, any marketing/storytelling measures should come paired with planning for infrastructure or management of the visitor flux.

We do support measures that improve access to information (websites, apps, signs) in principle. But delivery should ensure accuracy, balance and evidence-based messaging. 'Telling the story' shouldn't become propaganda for one viewpoint. The measures should guard against overly selective history or highlighting only certain perspectives (eg. only romanticising wild nature and ignoring how people have cared for it). They should aim for an honest narrative that respects all stakeholders.

Crucially, the stories told should recognize land managers as active custodians of the landscape. The uplands are not a museum. These places are actively managed and those managers' voices and experiences are part of the story. The Plan should involve those who work the land (farmers, keepers, estate owners, local community members) in developing interpretive materials. This would strengthen credibility and effectiveness. People can tell when something is written with local input versus an outside agenda.

Practically, interpretation must avoid one-sided narratives. For instance, if telling the story of grouse moors, include both the sporting heritage and the conservation work done by gamekeepers. Not just one or the other. If talking about moorland biodiversity, mention how controlled burning and grazing regimes have played a part alongside natural processes. Balanced storytelling educates visitors properly, fosters respect, and yes, encourages responsible behaviour (someone who read that keepers help prevent fires might think twice before lighting a BBQ on the heather).

In summary, we disagree with AE3 measures until they explicitly commit to balanced, inclusive content and to managing any increased tourism responsibly. Add those, and we'd be supportive.

**26a. To what extent do you agree with the Access and Engagement AE4 Young People Outcome, in general?**

☒ Disagree

**26b. Why do you feel this way?**

We wholeheartedly welcome the objective of encouraging young people to engage with the landscape. The next generation of rural stewards and supporters is crucial. Many estates and farms already host school visits, offer work placements, or support programs like 'Let's Learn Moor' to get children out on the moors. Early connection builds understanding, skills and long-term stewardship. Our hesitation with the Outcome is similar to earlier ones. It seeks to increase access or activities for young people without explicitly mentioning safeguards (land management, safety etc.). 'Opening the gates and hoping for the best' could be problematic. Any such programs must be well-managed and resourced, not simply rely on landowners to handle an influx of youth groups without support.

The Outcome would be stronger if it recognized the role of working land and land managers in providing real-world learning for young people. Many good initiatives involve farmers and keepers as mentors (like showing how to plant trees or manage heather). The Outcome should explicitly mention partnerships and existing good practice. This not only gives credit where due, but paves the way to scale up what works (hands-on activities supervised by knowledgeable practitioners).

Because the draft doesn't make this clear, we disagree as worded. With those revisions (highlighting partnership with land managers and existing successful programs) we would agree.

**26c. To what extent do you agree with the Access and Engagement AE4 Young People Measures, in general?**

☒ Disagree

**26d. Why do you feel this way?**

We do not agree with AE4 Measures as drafted. Repeating a theme: increased programming for youth brings increased responsibility, cost and liability. Measures must explicitly recognize estates' role in managing these and not create burdens by default.

For example, organizing outdoor programmes for youth typically requires insurance, qualified leaders and safety planning. These cannot just be presumed and offloaded onto landowners without support. The measures should clarify such programmes will be properly resourced and voluntary for landholders.

That said, we broadly support the spirit of the measures, especially those that promote education, skills and participation for young people. To be effective, they should be delivered in partnership with land managers and estates. Many estates would be willing partners given proper coordination (some already run 'safari' days or host school camps). The key is to avoid overly prescriptive approaches that might significantly increase access pressures without adequate management.

A balanced approach is needed to ensure benefits for youth and landscape. For instance, instead of just sending school groups camping on open moorland (which could cause issues like fire risk or disturbance), a better measure might involve estate owners in planning safe, instructive activities like tree planting in suitable spots, or archaeology projects on estate land, with clear roles and limits.

In summary, we support engaging young people with nature. We insist it be done thoughtfully: proper training and supervision, respect for ongoing land operations, clarity on responsibility. The measures should facilitate and encourage such programs (perhaps through grants or staff support), not mandate them in a way that burdens land managers. It should be about providing resources and coordination while trusting local managers and educators to shape the details.

Without these assurances, we disagree with the measures. If they were revised to emphasize partnership and resourcing, we'd be happy to agree.

**27a. To what extent do you agree with the Access and Engagement AE5 Building Relationships Outcome, in general?**

☒ Disagree

**27b. Why do you feel this way?**

We do not oppose the objective of strengthening relationships across the landscape (between different stakeholders and communities). In fact, we actively support better relationships and understanding; the Moorland Association itself often works to bridge gaps between land managers and other groups.

However, we cannot agree to an Outcome that suggests creating new forums or structures that increase process and access pressures without explicit safeguards for land management, biosecurity, wildfire risk and public safety. In other words, relationship-building is good, but not if it inadvertently results in more bureaucracy or more unmanaged access events, unless those risks are addressed.

The Outcome should explicitly recognize that many positive relationships already exist in the North Pennines. For example, some estates have local liaison meetings with parish councils; some keepers collaborate with birdwatchers informally; farmers and conservation project officers often have long-running partnerships. The focus should be on building on these existing relationships, not assuming nothing is happening and inventing entirely new structures. Sometimes simply supporting what's already there (like giving a small grant to a local moorland group to hold an event) would achieve the goal without new committees.

We caution against creating potentially bureaucratic forums that might be seen as 'talking shops.' Land managers are practical people with limited time and they can get consultation fatigue. The Outcome should emphasize improving communication channels in ways that people find useful, not burdensome.

Since the draft didn't make this clear, we disagree as written. Recognizing existing efforts and committing to light-touch, meaningful engagement (rather than endless meetings) and we'd agree.

**27c. To what extent do you agree with the Access and Engagement AE5 Building Relationships Measures, in general?**

☒ Disagree

**27d. Why do you feel this way?**

We do not agree with the AE5 Measures as drafted. As emphasized throughout AE1 to AE5, any initiative (even well-intentioned relationship-building workshops or forums) that imposes on people's time and operations brings costs. Meetings aren't free. A farmer attending a forum is an hour not tending sheep; a keeper writing a report is time not on the hill.

Measures must explicitly recognize the role of estates in these processes and not create burdens by default. Many land managers are extremely busy and additional meetings or reporting could be a burden if not clearly beneficial. We do support practical measures that encourage collaboration and shared problem-solving, but they must be proportionate, inclusive and grounded in local knowledge.

For example, facilitating periodic round-table meetings between conservation bodies, recreation groups, and estate reps could be useful. However, it should be done in a way that respects everyone's schedules (maybe piggyback on existing meetings like Local Access Forum) and leads to

concrete action, not just dialogue for its own sake. The measures should acknowledge time and resource constraints of land managers and avoid creating unnecessary process or paperwork that pulls them away from managing land.

A good measure might be funding a dedicated liaison officer or facilitator who travels to meet farmers/keepers on their terms, rather than expecting them to attend many committee meetings. Or using online platforms or WhatsApp groups to share info which doesn't require constant in-person presence. Be creative and efficient.

In essence, we favour relationship-building efforts that are practical and efficient. The current measures are a somewhat vague and could inadvertently result in talk-heavy, action-light outcomes. We urge that as they are developed and truly add value rather than weighing down those we are trying to bring together.

So, as written, we disagree. With assurances of keeping things useful and not onerous, we would back measures to improve relationships because ultimately, good communication benefits everyone.

## **CLIMATE ADAPTATION**

### **28a. To what extent do you agree with the Climate Adaptation Outcome, in general?**

☒ Disagree

### **28b. Why do you feel this way?**

The Moorland Association recognizes the need for resilient landscapes and communities in the face of climate change. We support, in principle, an Outcome that seeks to prepare the North Pennines for climate-related risks. However, the draft Plan's Climate Adaptation Outcome gives far greater and more explicit weight to flooding than to wildfire. This is a significant imbalance.

Given the increasing frequency and severity of upland wildfires (as evidenced in recent years and highlighted by national climate risk assessments), a much clearer recognition of wildfire as a distinct climate risk is needed. Currently, wildfire is mentioned only indirectly or under biodiversity contexts. It deserves standalone emphasis as a direct threat to safety, carbon stores and habitats under a warming climate. The Outcome should explicitly reference mitigating wildfire and extreme heat risks, alongside flood and heavy rainfall.

Additionally, the Outcome and supporting text place significant additional expectations on land managers (like doing natural flood management, peat restoration, tree planting for carbon) but do not assess whether sufficient capacity exists to deliver all these expectations simultaneously. Nor how that capacity will be maintained or enhanced during a period of major change (as other sections of Plan may curtail traditional incomes). This is a crucial oversight.

Adapting to climate change is labour-intensive and resource-intensive. In this context, the Plan must explicitly recognise that land management capacity is itself a critical determinant of environmental outcomes. Skilled people on the ground (including farmers, gamekeepers, estate workers and contractors) provide continuous monitoring, early intervention and first response to incidents such as wildfire, flooding, disease outbreaks and infrastructure failure. Where policy signals, funding structures or cumulative restrictions undermine the economic viability of these roles, the result is not benign 'recovery' but a loss of management presence, delayed response and heightened risk. Other protected landscapes have acknowledged this reality by explicitly noting the consequences of management withdrawal. The Association strongly urges the North Pennines Plan to do the same, and to treat the maintenance of on-the-ground capacity as a prerequisite for successful climate adaptation, not an optional by-product.

If the same estates and farms that currently manage the land are expected to do even more (while possibly reducing some traditional income activities per other Plan outcomes) the Plan must address how they will be supported. Otherwise, the Outcome risks being aspirational on paper but undeliverable in practice.

For these reasons (wildfire omission and lack of realism about capacity) we disagree with the Outcome as it stands. We would support a revised Outcome that more evenly addresses all major climate risks (wildfire, drought, flood, heat) and acknowledges the need to empower land managers with resources and training to implement adaptation measures.

**28c. To what extent do you agree with the Climate Adaptation Measures, in general?**

☒ Disagree

**28d. Why do you feel this way?**

We do not agree with the Climate Adaptation Measures as framed. Climate adaptation must be operationally deliverable. It must also be evidence-led and aligned with wildfire mitigation, access management and land management capacity on the ground.

As a starting point, the Association stresses that lawful, proportionate and evidence-led predator control is a long-established component of upland land management and plays a role in supporting balanced ecosystems, protecting vulnerable species and maintaining viable management systems. Where carried out in compliance with best practice, such activity is a legitimate management tool, not an anomaly or interim measure. Management plans should therefore refer to predator control in a neutral and factual manner, recognising its place within the wider land management toolkit, rather than implying that it is inherently problematic or something to be phased out by default.

The current set of measures strongly emphasize flood risk management and catchment processes (slowing the flow, natural flood management etc.). By contrast, wildfire (arguably an equally severe and more immediate climate risk in the uplands) is addressed only indirectly or minimally. We believe the measures would be much more effective if they included explicit actions on wildfire prevention, fuel management and preparedness. For instance, supporting the creation of strategic firebreaks, controlled burning or cutting programs for fuel reduction (in appropriate weather/windows). This includes training, equipping local fire response teams and improving water availability for firefighting in remote areas (like creating fire ponds or helicopter landing areas).

These sorts of measures directly address current and future climate risks as identified by experts. Notably, the MHCLG and others are working on a Wildfire Action Plan recognizing these needs. The AONB Plan should mirror that urgency.

Moreover, many adaptation measures imply multiple new responsibilities for land managers: tree planting for carbon, blocking drains for peat, creating ponds for drought resilience etc. This is on top of their existing duties. Yet the Plan does not spell out how such an ambitious suite of measures will be resourced or coordinated. We reiterate that any climate adaptation plan for the uplands must consider the manpower and funding needed. It should include clear review triggers and contingency options too. Adaptation actions should be treated as experiments to some extent that are monitored and adjusted if they have side-effects. Without explicit review points and fallback plans, the risk of unintended consequences (like increased wildfire risk or other ecological imbalances) will grow.

For example, if large areas are re-wetted to prevent peat dry-out (a climate goal) but no one monitors fuel buildup, we could inadvertently raise wildfire potential. This is exactly the kind of conflict we are concerned about. Every measure should have a built-in mechanism to evaluate

success and catch problems early, making changes if needed. The Plan should commit to this adaptive management cycle.

In summary, we feel the measures need re-balancing (give wildfire and extreme heat equal footing with flood and rainfall issues) fleshing out in terms of who does what (and with what funding) and tightening with regard to monitoring and adjustment. Only then will the Climate Adaptation measures be robust and defensible.

## **29. Do you have any other comments?**

The Association's comments are intended to apply not only to the Plan's immediate preparation and adoption, but to how it may reasonably be relied upon, cited or operationalised over its lifetime by public bodies and other decision-makers beyond the National Landscape Partnership itself.

We recognize the good intent of the draft Management Plan and its vision for a collaborative approach to the North Pennines' future. We note, however, a number of significant unresolved risks and ambiguities that must be addressed to make the Plan effective and legally sound. With some modest clarification and strengthening in the key areas we have outlined above, the Plan has the potential to provide a robust and effective framework for delivery over the 2026–2031 period.

However, as it stands, the Plan currently lacks a transparent delivery and cost model. It does not clearly set out how long-term liabilities will be managed once public funding or pilot schemes end. There is insufficient clarity on how economic transition risks will be managed if alternative income streams (for example, new environmental payments or visitor revenues) do not materialise at the required scale or pace. These practical considerations are not minor details, they are fundamental to whether the Plan's aspirations can be achieved without negative fallout for those who live and work here. We urge the authors to include a section on implementation. This should identify who leads each action, approximate resources needed and contingencies.

Finally, the Association emphasizes that the Management Plan should be applied strictly within its statutory status. It is a guidance and partnership document, not a regulatory instrument. It must not be relied upon to extend regulatory expectations or constrain lawful land management beyond existing legal frameworks. All authorities involved have a duty (strengthened by recent legislation) to seek to further the AONB/National Landscape purpose, but this must be done through proper processes. They must respect the primacy of adopted development plan policies, established laws and evidence-based decision-making. In implementation, the Plan should facilitate cooperation and positive change, rather than be used as a tool to impose new de facto rules.

The Moorland Association remains fully committed to constructive engagement. We believe that by making the adjustments described (clarifying policy status, grounding actions in evidence and law, and actively involving land managers in delivery) the final Management Plan can achieve its aims in a fair, balanced and realistic way. We look forward to continuing dialogue and partnership to ensure that outcome.