



The Moorland Association

West Pennine Moors Stakeholder Engagement Consultation Response

I. What is working well? What are the current strengths across the West Pennine Moors?

The Moorland Association considers that there is much in the West Pennine Moors approach that is working well and provides a constructive basis for further progress.

Breadth of engagement and recognition of a working landscape

The documents show a genuine attempt to engage a wide range of people who live in, work in and visit the West Pennine Moors, rather than treating stakeholder engagement as an afterthought. The Plan recognises from the outset that the landscape is shaped by many different interests and that successful delivery depends on structured, ongoing engagement across those groups. That breadth is a strength.

It is positive that landowners and land managers are explicitly identified within the stakeholder structure, and that the engagement framework includes dedicated land manager meetings and channels for views to be fed into the board and project team. That is important because the West Pennine Moors are not simply a recreational landscape; they are also a managed, working landscape, and any credible long-term scheme must be grounded in the knowledge and experience of those who manage the land every day.

Recognition of practical pressures and operational realities

The Plan appears to understand that the West Pennine Moors already face real practical pressures, rather than presenting the area as an abstract environmental canvas. The executive summary recognises frequent moorland fires, flood risk, high visitor numbers and the intensity of recreational use. Likewise, the wider Plan includes a substantial section on antisocial behaviour and proposes practical responses including a Ranger Service, on-site enforcement, engagement with communities and young people, and longer-term planning around off-road vehicle use, fire risk and animal issues. That practical recognition of operational pressures is welcome.

Communication, participation and public understanding

There is merit in the Plan's effort to improve communication and reduce misunderstanding. The documents acknowledge that information about the West Pennine Moors can be difficult to find, inconsistent, or not sufficiently clear on issues such as recreational disturbance, routes, wildlife sensitivities and reporting processes. A commitment to improve the quality and accessibility of public information should help reduce conflict, improve responsible behaviour and support better public understanding of how the landscape functions.

Another strength is the way it tries to connect environmental ambition with local participation. The use of Community Forums, Task and Finish Groups, Parish and Town Council Forums, surveys, guided walks, workshops, educational activity and volunteering opportunities suggests an intention to build durable local support rather than rely on one-off consultation. The commitment to monitor engagement outcomes and review methods over time is also sensible.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

Active management, stewardship and heritage

The Plan does show welcome awareness that farming and land management should be part of the story told to the public. This is particularly evident in proposals for farmer-focused engagement, educational activity co-designed with farmers, and gatherings that celebrate how management has benefited the community, environment and wider landscape. That is important and should be built on. The West Pennine Moors have been shaped by human management over a very long period, and the documents rightly acknowledge that farming, grazing, grouse shooting and other land uses have helped form the landscape seen today.

The proposal should go further, however, in recognising that some management practices are not merely part of the landscape's history but remain part of its present conservation reality. This includes predator control, which the project documents themselves acknowledge as being associated with the breeding success of waders in the West Pennine Moors. More broadly, public-facing engagement should be more open about the fact that many valued upland outcomes depend on active, ongoing stewardship by people on the ground, including land managers, farmers, keepers and other estate staff. In practice, that can include grazing management, habitat work, fire awareness, access maintenance, predator control in some contexts, wildlife monitoring, and the day-to-day presence of those who know the land intimately and respond quickly when problems arise. Many ground-nesting species thriving on these moors do so within a managed landscape, and the role of active management should not be treated as a historic footnote or left implicit in public engagement.

Lastly, the recognition of heritage, identity and local distinctiveness is another strength. The Plan does not treat the moors as empty space. It recognises the long history of human use and management and places current engagement within that wider cultural and historical context. That more balanced understanding is helpful and should support a more grounded conversation about the future of the landscape.

Overall assessment

Overall, the current strengths across the West Pennine Moors lie in the fact that the area already has a strong management history, an active community of stakeholders, high public interest, and a plan that at least attempts to connect environmental recovery with practical delivery, local knowledge and long-term engagement. In our view, the strongest elements are the recognition of operational pressures, the inclusion of land managers in governance and engagement structures, the focus on antisocial behaviour and wildfire-related issues, and the effort to improve public understanding of how this working landscape is managed.

The Moorland Association therefore supports the constructive parts of this work and welcomes the fact that the Plan contains a number of practical foundations on which trust, cooperation and better outcomes could be built.

2. Opportunities – what is coming up across the area that may also be an opportunity for the West Pennine Moors that might not have been considered?

The Moorland Association considers that there are a number of important opportunities emerging across the West Pennine Moors area, but that these will only be realised if the project remains practical, balanced and genuinely collaborative with those who manage the landscape on the ground.

Building trust and improving public understanding

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

A key opportunity is to use the Stakeholder Engagement Plan to build a more mature and durable relationship between communities, visitors, delivery bodies and land managers. The documents already identify feelings of disconnect between landowners and local communities, alongside a wider need for better communication, improved understanding of land management, and more opportunities for co-design. If handled well, this creates an opportunity not merely for more engagement activity, but for better-quality engagement that improves trust, reduces conflict and gives local people a clearer understanding of how a working moorland landscape functions.

Wildfire awareness and responsible access

There is also a major opportunity to improve public understanding of wildfire risk, responsible access and the consequences of antisocial behaviour. The West Pennine Moors already experience frequent moorland fires, high visitor pressure and a range of recreational uses. The proposed Ranger Service, interpretation, public information, school activities, community events and targeted work with young people could, if well designed, become part of a more strategic prevention approach. This is particularly important because prevention, early intervention and public understanding are often more effective than enforcement alone. A clearer, shared public message on fire risk, livestock, dogs, ground-nesting birds, access sensitivity and emergency reporting could provide real practical benefits across the landscape.

There is also an opportunity for the project to support a more mature and evidence-led discussion of wildfire mitigation tools. If the West Pennine Moors are to become a stronger example of integrated upland resilience, the project should recognise that fuel management may in some circumstances require a range of lawful tools, adapted to site conditions and habitat objectives. This may include cutting, grazing, restoration, firebreak creation and, where appropriate and properly regulated, controlled burning. The point is not that one tool fits all circumstances, but that the project should not present wildfire resilience as achievable through awareness-raising and access management alone. A credible strategy should acknowledge the importance of a practical fuel-management toolkit alongside restoration, monitoring and public engagement.

Presenting land management as part of the solution

A further opportunity lies in presenting farming and land management more positively and more visibly as part of the solution. The documents already refer to farmer engagement, farm visits, educational activities co-designed with farmers, and events celebrating how management has benefited the wider landscape. That should be expanded. There is a real opportunity here to help the public understand that many of the moors' special qualities are not accidental, but are the result of long-term active management, including grazing, habitat work, predator control in some contexts, access maintenance, fire prevention and day-to-day stewardship. The project also has an opportunity to explain more clearly that land managers, farmers, keepers and estate staff are not separate from environmental delivery but are often part of the practical infrastructure that makes it possible. Better public recognition of that reality would improve the credibility of the project, reduce misunderstanding, and help counter the tendency for land management to be treated as something separate from nature recovery rather than one of the means through which recovery is often sustained in a working upland landscape.

Governance, participation and delivery

There is also an opportunity to strengthen delivery by making governance more transparent and more locally accountable. The documents propose a wide range of forums, surveys, working groups and co-design processes. That creates scope not only for participation, but also for a better delivery

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

model if roles, responsibilities and feedback loops are made clearer. For example, there is an opportunity to ensure that where people are asked to report issues, contribute evidence, or attend meetings, they can see what decisions followed, who is responsible for implementation, and how progress is being measured. This would make the engagement process more credible and reduce the risk that participation becomes an end in itself rather than a route to practical action.

Related to this, there is an opportunity to recognise that meaningful land manager participation requires proper support. If land managers are expected to contribute regularly to governance, planning, workshops and review processes, that should not rely indefinitely on unpaid goodwill. A more balanced model of participation, including expense cover or modest support for agreed roles, would help ensure that governance is genuinely representative of those expected to deliver outcomes on the ground, rather than favouring only organisations with salaried staff and project-funded capacity. That would strengthen both fairness and delivery.

Volunteering, citizen science and smarter access

The project also has an opportunity to use citizen science and volunteering carefully and constructively. Done well, these can improve public understanding, strengthen local ownership and generate useful information. But their greatest value may come where they are linked to clear standards, expert oversight and practical management needs, rather than treated simply as participation metrics. In particular, there is an opportunity to align volunteer and citizen science activity with tangible outcomes such as wildfire awareness, habitat condition recording, path monitoring, invasive species reporting and species surveillance, while ensuring that this complements rather than complicates existing management responsibilities.

Another opportunity is to connect health, education and community activity more carefully with the realities of site capacity and land use. The documents refer to green social prescribing, educational work, festivals, guided walks and broader wellbeing activity. These could be valuable, especially in communities close to the moors. However, the opportunity is greatest if such initiatives are targeted towards places and formats that reduce pressure on sensitive sites, encourage responsible behaviour, and support better spatial distribution of visitors. In other words, the West Pennine Moors could become a model not just for increasing access, but for managing access intelligently and responsibly.

Integrated upland resilience and outcome-focused success

There is also a strategic opportunity to make the West Pennine Moors a stronger example of integrated upland resilience. The area already faces linked pressures around climate, fire, flooding, biodiversity, public access and land-use tension. That means it is well placed to demonstrate a more joined-up approach in which habitat restoration, wildfire mitigation, public communication, practical land management and community engagement are considered together rather than separately. A successful model here could have wider relevance for other heavily visited upland landscapes.

Finally, there is an opportunity to improve how success is defined. The engagement documents refer to indicators, evaluation, annual reporting and action-reflection cycles. That is useful, but the project should take the further opportunity to measure success not only by the number of events, workshops, volunteers or participants, but by whether trust improves, conflicts reduce, wildfire incidence falls, responsible access increases, practical cooperation strengthens and environmental outcomes are actually delivered on the ground. A stronger focus on outcomes rather than activity would make the stakeholder engagement work more useful and more credible.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

Overall assessment

Overall, the Moorland Association considers that the greatest opportunities are not simply to expand engagement activity, but to improve the quality of relationships and delivery across the landscape: better public understanding of active management, better wildfire prevention, clearer accountability, more balanced governance, stronger support for practical land management, and more intelligent handling of access and community participation. If these opportunities are taken, the West Pennine Moors could become a stronger example of how environmental ambition and working-landscape reality can be brought together constructively.

3. Weaknesses – are there any areas missing from the Stakeholder Engagement Plan so far, and have you any suggestions to help with this?

The Moorland Association considers that the Stakeholder Engagement Plan is broad in scope and clearly well-intentioned. However, there are several important weaknesses and omissions which should be addressed if the Plan is to command long-term confidence among those who manage the landscape on the ground and if it is to deliver practical rather than purely process-based outcomes.

Land managers as core delivery partners

One important weakness is that, while land managers are included in the engagement structure, the Plan does not yet go far enough in recognising them as core delivery partners whose time, knowledge and operational capacity are fundamental to success. The documents refer positively to land manager meetings, land manager representatives, liaison arrangements and “thank-you” gatherings, which is welcome. But this still risks treating land managers as one stakeholder group among many, rather than as the people who will often carry the day-to-day responsibility for implementing, accommodating, or responding to the consequences of project decisions on the ground. The Plan would be strengthened by more explicit recognition that the West Pennine Moors are a living, working landscape and that practical delivery depends on maintaining skilled, economically viable and respected land management.

Resourcing participation properly

The Plan is also weak on resourcing the participation it expects from land managers. It proposes regular meetings, representation roles, co-designed educational activity, outreach, and involvement in wider engagement work. Yet it does not appear to address whether core participation by land managers in governance and delivery will remain dependent on unpaid goodwill. In practice, that can skew participation towards organisations with salaried staff and away from people with direct operational responsibilities. The Plan should therefore consider formal support for agreed representative roles and core delivery participation, including at least expense cover and modest time support where engagement is essential to project governance.

Governance, accountability and conflict resolution

Another weakness is the limited clarity around accountability and decision-making. The Plan contains many forums, workshops, groups, surveys and feedback routes, including community forums, task-and-finish groups, working groups, walk-and-talks and parish forums. That breadth shows ambition, but it also creates a risk that engagement becomes diffuse and difficult to navigate. It is not yet sufficiently clear who ultimately decides what, how competing views will be resolved, what happens when stakeholder priorities conflict, or how feedback is translated into operational decisions. The Plan would be improved by a simpler and more transparent statement of governance: who has

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

decision-making authority, what matters are advisory, how conflicts are resolved, and how stakeholders can see that their input has led to a specific outcome.

The Plan would benefit from a clearer conflict-resolution mechanism. The West Pennine Moors inevitably involve tensions between access, wildfire risk, habitat restoration, farming, recreation, livestock, wildlife management and community expectations. The current documents identify many of these pressures, but they do not yet set out a standing method for dealing with such trade-offs when they arise. Without that, difficult issues may be deferred, politicised or handled inconsistently. The Plan should include a transparent process for resolving conflicts between objectives, with agreed evidence sources, named conveners, review triggers and a route for adapting measures where unintended consequences emerge.

Access burdens and operational resilience

The Plan is not yet strong enough on access management in a working landscape. It recognises the risks associated with increased visitor numbers and refers to Site Access Plans, local consultation and support for communities and land managers. However, the engagement documents place significant emphasis on widening participation, youth engagement, interpretation, trails, guided activity, volunteering and community events, while giving less prominence to who will manage the resulting operational burdens over time. This matters because increased use can bring increased maintenance, more disturbance, more fire risk, more livestock issues and greater pressure on infrastructure. The Plan should therefore include clearer commitment to responsible access, practical safeguards, maintenance responsibilities, emergency access considerations, and the principle that additional burdens and liabilities should not simply default to landowners and managers.

The Plan does not yet say enough about operational resilience and public safety. Wildfire and antisocial behaviour are recognised, and the proposed Ranger Service and ASB working group are useful steps. However, the engagement framework should go further in acknowledging the importance of management infrastructure, emergency access, site-level practicality and the role that land managers already play in prevention and first response. In heavily visited upland landscapes, wildfire resilience is not just a communications issue; it depends on people, access, local knowledge and the ability to act quickly. The Plan would be stronger if it explicitly recognised wildfire mitigation and operational preparedness as part of stakeholder engagement rather than treating them as peripheral delivery matters.

It should also acknowledge that wildfire preparedness may depend on retaining practical management capacity on the ground, including access, local knowledge, maintained infrastructure and the ability to deploy lawful fuel-management measures where needed.

Soft regulation and policy drift

A further weakness is the absence of clear safeguards against policy drift or “soft regulation.” The Stakeholder Engagement Plan is framed as collaborative and non-regulatory, but it sits within a wider Landscape Recovery context and is clearly intended to influence future decisions, behaviour and delivery priorities. From the perspective of Moorland Association members, it is important that aspirational language, co-design structures or engagement principles are not later treated as if they create new obligations, new tests, or a presumption against lawful land management. The Plan should therefore explicitly state that it does not create new regulatory thresholds or informal policy requirements, and that engagement structures are intended to support delivery and trust, not to substitute for statutory decision-making processes.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

More generally, the project's engagement material should avoid presenting lawful management practices in a simplistic or one-sided way, and should instead reflect that such practices may involve trade-offs but can also form part of the practical solution in a working upland landscape.

The Plan should make clear that stakeholder engagement is not a route to creating new informal tests, presumptions or quasi-obligations against lawful land management. Engagement should inform better decisions and stronger relationships, not become a mechanism through which compliant land managers are subjected to additional expectations without clear authority, evidence or due process.

Measuring outcomes, not activity

How success is measured is another weakness. The Plan refers to monitoring, evaluation, annual reporting, surveys and databases, which is sensible. However, it appears at risk of measuring activity more readily than outcome: the number of events, participants, groups engaged, volunteers recruited, or workshops held may be easier to count than the actual effect on trust, behaviour, wildfire prevention, conflict reduction or delivery confidence. The Plan would be stronger if it placed greater emphasis on outcome-based indicators, including whether land manager confidence improves, whether responsible behaviour by visitors increases, whether incidents decline, whether coordination becomes more effective, and whether stakeholder engagement materially improves project delivery.

Stewardship capacity and coordination between bodies

The Plan also underplays the economic and practical realities that sustain stewardship capacity. It refers to sustainable income and green markets, but does not yet say enough about the extent to which long-term environmental outcomes depend on the continued presence of people with the skills, incentives and time to manage the land. That is particularly important in upland settings, where management capacity is easily weakened if private investment, farming viability or estate-based stewardship are taken for granted. The Plan should more clearly recognise that environmental ambition depends on stewardship capacity, including existing farming, estate and keeping capacity where present, and that any engagement model which overlooks economic viability risks weakening the very delivery base on which long-term outcomes depend.

Finally, the Plan could do more to explain boundaries and responsibilities between the many public bodies and partners involved. The stakeholder structure includes local authorities, police, emergency services, utilities, access bodies, community organisations and others. This breadth is understandable, but without clearer coordination arrangements there is a risk that land managers are left dealing with fragmented or inconsistent expectations from different bodies. The Plan should therefore provide a more explicit account of how partner organisations will coordinate in practice, particularly where public safety, access management, conservation, enforcement and land management needs overlap.

Overall assessment

In summary, the main weaknesses are not a lack of activity or goodwill, but a lack of sufficient clarity and safeguards around delivery. The Stakeholder Engagement Plan would be improved by:

1. recognising land managers more clearly as core delivery partners rather than one stakeholder group among many;
2. providing better support for land manager participation in governance;

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

3. clarifying decision-making and conflict resolution;
4. strengthening safeguards on access-related burdens, safety and operational resilience;
5. making explicit that the Plan does not create new informal regulatory tests; and
6. measuring success through practical outcomes rather than participation metrics alone.

The Moorland Association's view is therefore that the Plan has a constructive foundation, but it needs to be made more grounded, more accountable and more explicit about the realities of managing a highly visited working upland landscape if it is to retain the confidence of those expected to help deliver it.

4. Threats – what things might occur that could create issues? What could go wrong?

The Moorland Association considers that the main threats to the success of the Stakeholder Engagement Plan do not arise from a lack of ambition, but from the risk that ambition is not matched by clarity, realism and operational accountability. In a highly visited working upland landscape, there are several ways in which a well-intentioned engagement plan could fail or create unintended problems.

Pressure from increased access and persistent anti-social behaviour

One of the most obvious threats is that visitor pressure may increase faster than the landscape's ability to absorb it safely and responsibly. The Plan places strong emphasis on widening participation, reducing barriers to access, engaging new audiences, involving young people, promoting events and activity, and using interpretation, trails and outreach to draw more people into the landscape. The area already receives millions of visitors and already experiences frequent moorland fires, antisocial behaviour and other pressures associated with intensive recreational use. If increased participation is not matched by clear access management, enforcement, maintenance and site protection, the result could be more conflict, more damage, greater fire risk and greater strain on those managing the land.

Another major threat is that wildfire and antisocial behaviour remain persistent or worsen despite the engagement activity proposed. The documents are right to identify off-road vehicle use, fire risk and animal issues as major concerns, and to propose a Ranger Service, better data collection and long-term planning. However, these problems are difficult, recurring and resource-intensive. If the proposed systems are underpowered, underfunded or not properly coordinated, the Plan could create raised expectations without delivering the level of visible control, deterrence and rapid response that local communities and land managers need. In those circumstances, confidence in the project could deteriorate quickly.

Process-heavy governance and land-manager fatigue

There is also a risk that governance becomes too process-heavy and insufficiently outcome-focused. The Plan contains a large number of engagement routes, including steering groups, community forums, task-and-finish groups, surveys, workshops, parish forums, volunteer structures and liaison arrangements. That breadth can be positive, but it also risks creating a system that becomes complicated, slow and difficult to navigate. If stakeholders are asked repeatedly for views, data and participation without clear lines of decision-making or visible implementation, the process may

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

become exhausting rather than enabling. This is especially important in landscapes where delivery depends on people with limited time and real operational burdens.

A further threat is that land managers disengage, or only participate intermittently, because the burden of engagement becomes too great relative to the support provided. The Plan clearly expects regular contribution from land managers through meetings, liaison, co-designed activity, reporting and participation in wider project structures. Yet the documents also acknowledge practical reporting fatigue among tenant farmers and the fact that previous digital reporting efforts tapered off because of work pressures and the difficulty of adding another reporting layer. If the wider engagement model is not realistic about time, practicality and the cumulative burden being placed on those managing the land, the very people most central to delivery may become less willing or less able to participate fully.

Liability, maintenance and governance drift

The project also risks unintentionally transferring responsibility, liability or long-term burden onto landowners and land managers without sufficient clarity or agreement. The Plan refers to improved infrastructure, reporting systems, ranger activity, volunteering, Community Champions, access interventions and visible management across the landscape. These may all be beneficial. But if there is no continuing clarity about who maintains infrastructure, who responds to incidents, who carries legal and practical responsibility, and what happens after project-funded periods change or end, there is a real risk that obligations drift by default towards those who already manage the land. That would undermine trust and could discourage future cooperation.

The Plan's collaborative language could also drift into informal policy pressure or "soft regulation." The Stakeholder Engagement Plan is not, on its face, a statutory instrument. But it is clearly intended to influence behaviour, priorities and delivery over a long period and sits alongside other project plans. Moorland Association members are understandably concerned where broad place-based or partnership language later begins to function as an implied benchmark against which lawful land management is judged, even where no formal change in legal obligations has occurred. If that happened here, it would damage confidence, reduce openness and make participation feel less like partnership and more like managed compliance. That broader risk of regulatory substitution and governance drift is one the Association has repeatedly identified elsewhere.

Reporting burden and overreliance on volunteer structures

Another threat is that data collection and reporting systems become an additional burden without producing genuinely useful action. The Plan proposes centralised recording, EarthRanger integration, repeated surveys, reporting systems and shared datasets. Better information can certainly help. But the documents themselves show that fragmented reporting, incomplete data and stakeholder fatigue are already a problem, and that previous systems did not always work well for tenant farmers. If new data systems are not simple, trusted and clearly linked to practical response, there is a risk of poor uptake, incomplete evidence and frustration among those expected to feed information into the system.

There is also a risk that volunteer and community models are expected to do more than they realistically can. Volunteers, Community Champions and local groups can add enormous value, but they cannot substitute for professional land management, emergency capability, enforcement or clear governance. The Plan proposes a minimum of 50 Community Champions and a significant expansion of practical volunteer and community involvement. That may help with local engagement and

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

awareness, but if such structures are relied upon to fill gaps created by limited formal capacity, there is a danger that expectations become unrealistic and accountability becomes blurred.

Activity metrics versus real-world outcomes

Another important risk is that the Plan ends up measuring activity rather than success. It would be easy for a programme of this type to show large numbers of events, participants, workshops, volunteers, sign-ups and communications outputs while still failing to reduce conflict, improve land-manager confidence, change irresponsible behaviour or strengthen delivery on the ground. If engagement success is judged mainly by volume rather than by practical outcomes, resources may be drawn towards visible activity instead of the harder but more important work of building trust, improving behaviour and solving operational problems.

Finally, there is a strategic risk that the project becomes overdependent on optimistic assumptions about capacity, funding and coordination. The Plan relies on partnership working across numerous bodies, sustained engagement over 20 years, a revived Ranger Service, repeated consultation, data systems, long-term outreach and the ability to align many different interests. That may be possible, but only if the system remains practical and properly resourced. The Moorland Association's wider experience is that under-resourced, fragmented and risk-averse delivery systems often generate process without sufficiently improving outcomes. If the West Pennine Moors project does not remain tightly focused on delivery realism, it risks becoming another example of good intentions weakened by insufficient practical capacity.

Overall assessment

In summary, the principal threats are:

1. increased visitor pressure without matching control and infrastructure;
2. persistent wildfire and antisocial behaviour;
3. over-complex governance;
4. land-manager disengagement through burden and lack of support;
5. unclear long-term liability and maintenance responsibilities;
6. drift from engagement into informal regulatory pressure;
7. reporting systems that create burden without improving action; and
8. an overreliance on participation metrics rather than real-world outcomes.

The Moorland Association's view is therefore that what could go wrong is not simply disagreement between stakeholders, but a deeper loss of trust if participation expands while practical delivery, accountability and operational realism do not keep pace.

20 March 2026

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.