



The Moorland Association

Sir Geoffrey Clifton-Brown MP
Chair, Public Accounts Committee
House of Commons
London
SW1A 0AA

27 May 2026

Dear Sir Geoffrey,

Defra nature recovery spending: value for money, delivery and outcomes

I am writing on behalf of the Moorland Association following Defra's announcement of a new £30 million Wildlife-Rich Habitat Fund for England's National Parks, National Landscapes and the Broads.

The Moorland Association welcomes public investment in nature recovery. Our members manage some of England's most important upland habitats, including blanket bog, heather moorland and breeding habitat for curlew, lapwing, golden plover, merlin and black grouse. Many of these landscapes sit within protected areas and are directly relevant to Defra's 30by30 ambitions, species recovery objectives, peatland restoration, wildfire resilience and wider environmental targets.

However, we believe the announcement raises important questions for the Public Accounts Committee about value for money, transparency, additionality and measurable outcomes. These are questions of economy, efficiency and effectiveness for taxpayers: whether public money is being spent through the simplest workable routes, whether it is reaching those best placed to deliver, and whether it is producing measurable environmental improvements.

We ask the Committee to consider whether Defra's expanding nature recovery funding now merits scrutiny, and whether the National Audit Office should examine how much funding reaches direct delivery, what ecological outcomes are being achieved, and whether overlapping schemes are delivering additional value.

Defra has said the Wildlife-Rich Habitat Fund will restore and create wildlife-rich habitats across protected landscapes, will be delivered through the existing Farming in Protected Landscapes infrastructure, and will be prioritised through Protected Landscape management plans and Local Nature Recovery Strategies. This sits alongside a growing number of Defra nature recovery and land management funding streams, including the Species Recovery Programme, Landscape Recovery, Countryside Stewardship, FiPL, peatland and woodland schemes, Biodiversity Net Gain and wider 30by30 delivery.

We recognise Defra's intention to accelerate nature recovery in protected landscapes; our concern is that the delivery model must be capable of turning that intention into measurable results.

The key question is whether there is sufficient transparency about how much money reaches practical delivery on the ground, compared with the proportion spent on administration, consultancy, advice, partnership coordination and reporting.

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This is consistent with the evidence we submitted to the Committee earlier this year on environmental regulation reform. In that evidence, we argued that England's environmental regulatory system too often rewards activity, process and procedure rather than real-world environmental outcomes. We called for a shift from a centrally controlled, permission-based system to a locally led delivery model, operating under national standards and judged by measurable results.

We raise this now as a practical follow-up to that evidence, because the Wildlife-Rich Habitat Fund provides an immediate test of whether Defra's delivery model is becoming more outcome-focused, transparent and locally grounded.

The new Wildlife-Rich Habitat Fund reinforces that case. More money will not automatically produce better environmental outcomes unless the delivery model is right.

In the uplands, nature recovery is not delivered by press releases or plans alone. It depends on year-round decisions made by the people managing the land: grazing, cutting, bracken control, grip blocking, vegetation management, wildfire prevention, essential predator management, species monitoring and peatland restoration, all adapted to local conditions. Gamekeepers, farmers, moorland managers, graziers, estate teams and local contractors are often central to this work. If these experienced delivery partners are not properly included in scheme design and funding routes, there is a risk that public money fails to make full use of existing skills, access and delivery capacity already present on the ground.

Against that background, the key questions are practical and auditable.

In particular, we believe Parliament should ask:

- 1. How much public money reaches direct practical delivery?**
What proportion of funding is spent on physical habitat management, species recovery, peatland restoration, wildfire resilience and land management, as opposed to administration, consultancy, advice, communications, partnership coordination and reporting?
- 2. Who receives the funding?**
How much is allocated to Protected Landscape bodies, conservation NGOs, local authorities, consultants, contractors, farmers, land managers, gamekeepers and private landholdings?
- 3. What outcomes are being measured?**
Are schemes judged by ecological results (such as peat condition, habitat quality, breeding bird productivity, wildfire risk reduction and SSSI condition) or by inputs such as hectares labelled, meetings held, partnerships formed or plans produced? What baselines are used, and how is progress independently verified?
- 4. Is the funding additional?**
Is the Wildlife-Rich Habitat Fund delivering new outcomes, or supporting work already funded, required or planned through FiPL, Landscape Recovery, Countryside Stewardship, peatland schemes, species recovery funding or other Defra programmes? How does Defra distinguish genuinely new outcomes from activity already required, already funded or already planned?

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5. **Are overlapping schemes creating unnecessary cost and complexity?**

The number of schemes, partnerships and strategies now operating across protected landscapes risks creating administrative burden and confusion for those expected to deliver practical results.

6. **Are trusted land managers being enabled to deliver?**

In our evidence to the Committee, we proposed earned recognition for trusted and accredited land managers. Such an approach would allow capable managers to deliver low-risk, evidence-based activity more efficiently, while regulators focus resources on genuine harms and poor practice.

7. **Does upland nature recovery properly account for wildfire resilience?**

Wildfire risk is one of the most serious threats to peat, carbon, habitats, water and wildlife. Funding and regulation should support active fuel-load management and locally appropriate wildfire prevention, not create perverse outcomes through blanket restrictions.

Such questions may also be relevant to any future National Audit Office examination of the economy, efficiency and effectiveness of Defra's nature recovery spending across these overlapping programmes.

The Moorland Association would be pleased to provide further evidence to the Committee, including practical examples from upland landscapes where public policy has either enabled or hindered environmental outcomes. We would also welcome the opportunity to brief the Committee or its clerks on practical upland examples relevant to any future inquiry or National Audit Office scoping work, and to set out how a more locally led, outcomes-based delivery model could improve value for money and nature recovery.

The test for these schemes should be simple: does the money reach the ground, and does it deliver measurable improvements for nature?

Yours sincerely,

Andrew Gilruth

Chief Executive
Moorland Association
agilruth@moorlandassociation.org

Cc:

Rt Hon Alistair Carmichael MP, Chair, Environment, Food and Rural Affairs Committee
Toby Perkins MP, Chair, Environmental Audit Committee

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