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

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

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

☑ Disagree

Q4) Additional comments on the vision:

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

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

1. A Living, Working Landscape

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

The Vision would be strengthened by explicitly recognising:
- The role of active land management in maintaining open moorland character.
- The contribution of private investment in sustaining peatland restoration, species monitoring, predator control and wildfire mitigation.
- The importance of economically viable land management systems to long-term ecological resilience.

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

2. Economic Viability and Stewardship Capacity

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

Where Vision language refers to transition, new economies or land use change, it should be accompanied by safeguards that:

- Do not pre-empt national policy development.
- Do not undermine lawful land uses.
- Recognise that removing income streams without secured alternatives risks reducing management capacity rather than enhancing nature recovery.

The uplands' ecological condition is closely linked to the presence of skilled land managers on the ground. Any vision of 2040 that does not explicitly protect that capacity is incomplete.

Financial Realism and Delivery Capacity

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

In particular, the Plan does not address:

- The scale of private investment currently underpinning upland stewardship.
- The economic consequences if existing income streams are weakened or destabilised.
- Whether alternative funding mechanisms are secured at sufficient scale and duration.
- The transitional funding required if management systems change.

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

The Plan would therefore be strengthened by:

1. A clear statement that delivery is contingent upon economically viable land management.
2. Recognition that removal of income streams without replacement risks reducing stewardship capacity.
3. A commitment to periodic financial review to ensure outcomes remain deliverable.
4. Explicit acknowledgement that partnership working must include financial realism alongside ecological ambition.

In addition, wildfire and climate transition risks carry potential liability and insurance implications. Where changes in vegetation structure or hydrology may increase exposure to fire during transitional periods, clarity is required regarding responsibility, risk mitigation funding and emergency response capacity.

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

3. Climate Resilience and Wildfire Risk

The Vision rightly emphasises climate adaptation, carbon storage and peatland function. However, climate resilience in upland landscapes must explicitly include wildfire mitigation.

Hotter, drier summers and longer drought periods are now established climate projections. Upland fuel continuity and access constraints are material public safety risks. A forward-looking Vision should therefore:

- Recognise wildfire as a strategic climate risk.
- Acknowledge the role of proactive fuel management and maintained access infrastructure.
- Avoid implying that management withdrawal automatically enhances resilience.

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

Operational Infrastructure and Emergency Access

In addition to strategic wildfire recognition, the Vision would benefit from explicit acknowledgement of the operational infrastructure required to maintain safety and resilience across the upland landscape. The Forest of Bowland is geographically extensive, remote and in parts difficult to access. Effective management of wildfire, flooding, rescue incidents and habitat restoration depends upon maintained operational capacity, including:

- Land management access tracks.
- Bridges and culverts.
- Turning areas and emergency access points.
- Water storage points and fire ponds.
- Equipment storage facilities.
- Telecommunications infrastructure.
- Drainage and water management systems.

These features are not incidental intrusions into landscape character; they are functional components of a safe and resilient working landscape. Where peatland rewetting, hydrological restoration or woodland expansion is proposed, the Plan should clarify how:

- Emergency vehicle access will be maintained across wetter terrain.
- Track maintenance and upgrade needs will be accommodated.
- Firefighting infrastructure will be preserved or enhanced.
- Temporary works during emergency response will be treated in planning contexts.

Without this clarity, there is a risk that landscape, geodiversity or restoration objectives could be interpreted downstream as constraining essential safety infrastructure. This would create tension between public safety obligations and environmental ambition. The Plan would therefore be strengthened by confirming that:

1. Operational infrastructure necessary for land management and emergency response is compatible with the conservation of natural beauty when sensitively designed.
2. Wildfire mitigation infrastructure is recognised as a landscape resilience asset.
3. Restoration measures will be implemented in a manner that does not compromise emergency access or response capability.
4. Public safety and operational continuity are integral components of climate resilience.

Explicit recognition of these practical requirements will reduce uncertainty and reinforce confidence that the Plan's delivery framework supports both environmental and safety objectives.

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

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

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

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

Even where the Plan is described as "non-statutory," it may materially influence:
- Planning determinations under the strengthened Section 85 duty.
- Licensing decisions by competent authorities.
- Funding prioritisation and scheme eligibility.
- Interpretation of conservation objectives at site level.

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

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

This is not a procedural technicality. It is a matter of legal robustness. Failure to transparently address in-combination risk may expose the Plan to challenge or create uncertainty for public authorities relying upon it in subsequent decision-making. Clear, plan-level compliance will protect all

delivery partners and strengthen confidence that environmental ambition is being pursued within a defensible statutory framework.

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

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

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

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

Governance, Accountability and Delivery Mechanisms
The Vision and Outcomes place strong emphasis on partnership working and collaborative delivery. However, the draft Plan does not clearly explain how governance, decision-making and conflict resolution will operate in practice.

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

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

The absence of explicit governance safeguards risks creating uncertainty for land managers who may otherwise face inconsistent signals from different bodies referencing the Plan. The Association therefore recommends that a short Governance and Implementation section be added to the Plan, clarifying:
- The advisory (non-regulatory) status of the Plan.

- The limits of its influence in planning, licensing and funding decisions.
- The mechanisms for review and amendment if unintended consequences arise.
- The process for resolving inter-agency conflict where objectives appear to compete (for example, conservation objectives and public safety obligations).

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

Q5) This Management Plan is built on a set of core principles which provide a framework to guide policy and practice in Bowland. Accepting these principles is essential to adopting and delivering the plan. Do you think we have identified all the relevant principles? (see p.29 of the plan)
☑ No

Q6) If you answered "No", please list any principles you think are missing, or provide suggestions for improving or clarifying the principles?
The Moorland Association recognises that the stated Core Principles are well intentioned and broadly framed around sustainability, partnership, climate resilience and nature recovery. We do not object to their overarching direction.

However, as drafted, the principles are incomplete. In their current form they risk being interpreted in a manner that extends beyond their strategic purpose and into implied regulatory positioning. To ensure confidence in adoption and delivery, several clarifications and additional principles are necessary. Below we outline suggested additions and refinements.

1. Principle of Management Neutrality
The Core Principles should explicitly confirm that the Management Plan is management-neutral. The Forest of Bowland is a living, working landscape shaped by lawful farming, grazing, moorland management and estate stewardship. The principles should make clear that:
- No lawful land use is pre-judged as undesirable.
- Enhancement does not imply management withdrawal as a default.
- Transition or change must be evidence-led and site-specific.

Without this clarification, broad sustainability or nature recovery principles could be interpreted downstream as signalling a presumption against established management systems. That would undermine confidence and cooperation.

2. Principle of Proportionality and Evidence
A Core Principle of evidence-led and proportionate decision-making should be included explicitly. This should confirm that:
- Actions must be based on robust, site-specific evidence.
- The evidential threshold for introducing new restrictions should be at least equivalent to that applied when assessing existing practices.
- Precaution must not become a substitute for analysis.
- Policies must be capable of review and amendment if outcomes are not delivered.

National scrutiny of environmental regulation has consistently highlighted the risks of over-centralised, risk-averse decision-making detached from delivery realities. Embedding proportionality within the Core Principles would strengthen the Plan's credibility.

3. Principle of Economic Viability and Stewardship Capacity
The Plan would benefit from a principle that explicitly recognises that: "Long-term environmental recovery depends upon economically viable land management and sustained stewardship capacity."

Active management, private investment and skilled practitioners are foundational to peatland restoration, species recovery, wildfire mitigation and access management. If economic viability is weakened, delivery capacity declines.

This is not a commercial argument; it is a delivery argument. The Core Principles should make clear that nature recovery and viable land management are mutually reinforcing, not competing objectives.

4. Principle of Public Safety and Climate Risk Management
Climate resilience is referenced, but the Core Principles should explicitly include:
- Recognition of wildfire as a strategic risk.
- The need for proactive fuel management.
- The importance of maintained access infrastructure for emergency response.
- The integration of environmental ambition with public safety.

Climate adaptation must address both ecological and safety dimensions. A principle that omits wildfire resilience leaves a material gap.

5. Principle of Non-Statutory Status and Regulatory Clarity
Given that accepting the principles is described as "essential to adopting and delivering the plan," it is important to clarify limits. The Core Principles should explicitly confirm that:
- The Management Plan is non-statutory.
- It does not create new regulatory tests.
- It does not pre-empt national consultations or licensing regimes.
- It informs partnership working rather than constraining lawful activity.

Experience elsewhere demonstrates that ambiguity at principle level can lead to unintended regulatory creep in planning, funding and regulatory contexts. Clarity protects all parties.

6. Principle of Adaptive Management
The Core Principles should commit to adaptive, learning-based delivery. Where interventions are trialled (eg. peatland techniques, woodland expansion, water management), there should be:
- Clear monitoring frameworks.
- Transparent review points.
- Willingness to adjust course if unintended consequences arise.

Environmental systems are dynamic. A rigid principle set without adaptive flexibility risks locking in suboptimal outcomes.

Conclusion
The existing Core Principles are directionally positive but incomplete. To command confidence across delivery partners and land managers, the Plan should explicitly incorporate principles covering:
- Management neutrality
- Evidence and proportionality
- Economic viability and stewardship capacity

- Public safety and wildfire resilience
- Non-statutory status and regulatory clarity
- Adaptive management

Including these would strengthen governance, reduce risk of misinterpretation and create a more robust framework for collaborative delivery.

The Moorland Association remains willing to engage constructively to ensure the Core Principles support both environmental ambition and practical, lawful land management in the Forest of Bowland.

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

Q8) Please add any further comments about the outcomes for Landscape:
The Moorland Association supports the statutory purpose of conserving and enhancing the natural beauty of the Forest of Bowland. We recognise that landscape character, tranquillity, openness and cultural heritage are central to the area's designation.

However, we disagree with the Landscape Outcomes as currently framed because they do not sufficiently acknowledge that the Bowland landscape is the product of active, skilled and economically viable land management. Without that recognition, the Outcomes risk being interpreted as favouring landscape change through management withdrawal or uniform prescription rather than through partnership and stewardship. Below we outline specific concerns and constructive suggestions.

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

The Landscape Outcomes should explicitly state that conserving landscape character includes maintaining the management systems that created and sustain that character.

Absent of this clarity, language around "enhancement" or "transition" could be interpreted downstream as implying that reduced intervention is inherently preferable. That is neither historically accurate nor operationally safe.

2. Avoiding Implied Presumptions Against Lawful Management
The Outcomes would benefit from explicit confirmation that:
- Lawful land management is not presumed to be a pressure.
- Enhancement does not equate to abandonment.
- Infrastructure necessary for land management and safety is compatible with landscape conservation when sensitively designed.

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

3. Climate Change and Wildfire Resilience

The Landscape Outcomes appropriately reference climate resilience. However, climate adaptation in upland landscapes must explicitly include wildfire risk. Warmer, drier summers are projected to increase fuel dryness and fire intensity. The following are all central to maintaining landscape resilience:

- Managed heather structure
- Fuel breaks
- Access tracks
- Emergency water points
- Skilled personnel presence

A landscape that is unmanaged or structurally uniform may appear superficially "natural" but can be materially less resilient to fire and extreme weather events. The Outcomes should therefore link landscape conservation with proactive risk management.

4. Cultural Landscape and Economic Viability

Natural beauty in Bowland is inseparable from its cultural landscape. The Landscape Outcomes would be strengthened by explicit reference to:

- The contribution of farming and estate management to landscape form.
- The importance of viable land-based businesses.
- The role of private investment in sustaining landscape features (walls, barns, access infrastructure).

If economic viability is weakened, landscape condition will deteriorate. Stewardship capacity and landscape character are interdependent.

5. Proportionality and Evidence

Landscape enhancement measures should be:

- Evidence-led
- Site-specific
- Proportionate

Blanket prescriptions or aesthetic preferences should not displace practical land management needs. For example, avoiding visually intrusive development is entirely appropriate. However, infrastructure that enables land management, wildfire mitigation or agricultural productivity should be facilitated where sensitively designed. The Outcomes should explicitly recognise this balance.

6. Constructive Recommendations

To improve clarity and delivery confidence, we recommend that the Landscape Outcomes:

1. Explicitly describe Bowland as a living, working landscape.
2. Recognise that open moorland character is actively maintained.
3. Confirm that lawful land management is compatible with landscape conservation.
4. Integrate wildfire resilience as a landscape objective.
5. Emphasise adaptive, partnership-based delivery rather than prescriptive change.

Interaction with the Strengthened Section 85 Duty
The Association notes that the strengthened duty under Section 85 of the Countryside and Rights of Way Act 2000 (as amended) requires public authorities to "seek to further" the purposes of designation when exercising their functions. However, this duty does not create new planning policy, nor does it convert non-statutory Management Plan wording into binding decision-making criteria. Given the strengthened duty's broader application across public authorities, it is important that the Management Plan clearly states:

- It is advisory and non-statutory in status.
- It does not redefine or expand the statutory meaning of "furthering."
- It does not create new thresholds, presumptions or prohibitions.
- It does not narrow the lawful scope of existing land management activity.
- Compliance with the Plan is not determinative of Section 85 compliance.

Without this clarity, there is a risk that aspirational or directional language within the Plan could be relied upon in planning, licensing or funding contexts as evidence of what "furthering" requires, thereby expanding expectations through interpretation rather than statute. Clear confirmation of the Plan's limits will protect both delivery partners and decision-makers from unintended regulatory drift and ensure that the strengthened duty is applied proportionately and lawfully.

Conclusion
The Moorland Association supports the ambition to conserve and enhance the landscape of the Forest of Bowland. However, we disagree with the Outcomes as drafted because they insufficiently acknowledge the central role of active management, economic viability and public safety in sustaining landscape character. With clearer recognition of these principles, the Landscape Outcomes could provide a robust and unifying framework for collaborative delivery. We remain willing to engage constructively to ensure that landscape ambition and practical stewardship are aligned.

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

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

However, we disagree with the Nature Recovery Outcomes as currently framed because they risk presenting recovery as something that will arise primarily through management restriction or transition, rather than through active, evidence-led land stewardship. The Outcomes do not sufficiently recognise that many of Bowland's most valued habitats and species are dependent upon ongoing, skilled management. Our concerns and constructive recommendations are set out below.

1. Nature Recovery Must Be Delivery-Focused, Not Presumption-Led
The upland habitats of the Forest of Bowland (including blanket bog, heather moorland, rough grazing and species-rich grasslands) are managed systems. Their structure, species assemblages and breeding success rates are influenced by:

- Grazing regimes
- Heather management
- Predator control

- Drainage and hydrological interventions
- Estate-based conservation investment

Nature recovery outcomes must therefore be explicit that:
- Lawful management systems are not presumed to be obstacles.
- Recovery pathways will be site-specific and evidence-led.
- Withdrawal of management is not treated as the default mechanism for enhancement.

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

2. Species Recovery and Managed Landscapes
Many upland bird species of conservation concern (including waders and raptors) are associated with actively managed moorland systems. Nature Recovery Outcomes should:
- Recognise the role of predator management (where lawful and proportionate) in supporting breeding success.
- Acknowledge the contribution of heather structure management to habitat heterogeneity.
- Avoid implying that reduced intervention inherently delivers better biodiversity outcomes.

Recovery strategies that do not account for ecological functionality at landscape scale risk unintended consequences.

Functional Habitat, Trade-offs and Species-Specific Evidence
Nature recovery outcomes should distinguish clearly between habitat *extent* and habitat *function*. In upland systems such as the Forest of Bowland, species performance is often closely linked to:
- Vegetation structure and age mosaics.
- Predator management regimes.
- Open landscape continuity.
- Hydrological balance.
- Managed heather composition.

Many ground-nesting upland birds (including waders and raptors associated with SPA designations) depend not merely on the presence of blanket bog or moorland, but on specific structural and ecological conditions created through active management.

Where the Plan promotes the following it should explicitly acknowledge that these changes may carry trade-offs for species reliant on open, structurally diverse moorland:
- Increased scrub expansion.
- Woodland connectivity.
- Reduced heather management.
- Altered predator control regimes.

The relevant legal and ecological question is not whether woodland or scrub are inherently positive features, but whether proposed landscape-scale changes have been assessed against:
- SPA qualifying feature requirements.
- Breeding productivity data.
- Predation pressure dynamics.
- Long-term species distribution evidence.

In particular, where a significant proportion of breeding distribution for certain species occurs on actively managed moorland, any presumption that reduced intervention will enhance biodiversity must be supported by robust, landscape-scale evidence. The Plan would therefore be strengthened by:

1. Explicit recognition of functional habitat requirements alongside habitat expansion goals.
2. A commitment to species-specific impact assessment where management systems change.
3. Clear acknowledgement that habitat diversification should not inadvertently reduce suitability for SPA qualifying species.
4. Monitoring frameworks capable of detecting productivity decline as well as habitat condition change.

Nature recovery ambition must be grounded in ecological functionality, not solely in habitat typology or land cover targets. Transparent acknowledgement of potential trade-offs will improve both scientific credibility and statutory robustness.

Monitoring, Adaptive Management and Review Triggers

While the Plan refers to partnership delivery and long-term ambition, it does not set out clear mechanisms for monitoring, review and adaptive adjustment if outcomes diverge from expectations. Given the scale of proposed change across peatland hydrology, habitat structure, woodland expansion and management regimes, explicit safeguards are required to ensure that:

- Intended ecological gains are realised.
- Unintended consequences are identified early.
- Public safety risks are not increased during transitional phases.
- Management systems remain capable of course correction.

In dynamic upland systems, ecological and hydrological responses are often non-linear. Interventions such as rewetting, altered vegetation structure, reduced burning or scrub expansion may produce:

- Delayed species responses.
- Changes in fuel continuity.
- Altered predation dynamics.
- Access constraints.
- Unexpected water movement or erosion effects.

Without defined monitoring frameworks and review triggers, there is a risk that strategic ambition becomes fixed policy direction even where field evidence indicates adjustment is required. The Plan would therefore be strengthened by:

1. Identifying measurable ecological and safety indicators (including breeding productivity, wildfire metrics and hydrological performance).
2. Establishing formal review intervals.
3. Including explicit "adaptive triggers" where outcomes fall below baseline.
4. Confirming that management tools remain available where evidence supports their use.
5. Committing to transparent publication of monitoring data.

Adaptive management is not a sign of uncertainty; it is a sign of scientific maturity. A Plan that embeds monitoring and course-correction mechanisms will be more resilient, legally robust and practically deliverable.

3. Climate Adaptation and Wildfire Risk

Nature recovery cannot be separated from climate resilience. The Outcomes appropriately reference peatland restoration and hydrological recovery. However, they do not sufficiently integrate wildfire mitigation as a nature recovery imperative. Unmanaged fuel accumulation can:

- Damage peat structure.
- Reverse carbon gains.
- Destroy breeding habitat.
- Undermine decades of conservation investment.

Nature Recovery Outcomes should therefore explicitly link habitat recovery with:

- Fuel load management.
- Emergency access.
- Operational resilience.

A recovery pathway that increases wildfire exposure would be environmentally and socially counterproductive.

4. Economic Viability and Stewardship Capacity

Nature recovery in the uplands is currently supported in part by private investment and estate-based management capacity. The Outcomes should explicitly recognise that:

- Ecological ambition depends on sustained stewardship presence.
- Viable land-based enterprises underpin habitat management.
- Removing economic foundations without secured alternatives risks reducing management capacity and slowing recovery delivery.

This is a governance and delivery issue, not a commercial defence.

5. Evidence, Proportionality and Adaptive Management

The Outcomes should commit explicitly to:

- Proportionate intervention.
- Symmetry of evidence when introducing new restrictions.
- Monitoring and adaptive review.
- Willingness to adjust delivery mechanisms where unintended consequences arise.

National audit and oversight bodies have repeatedly emphasised that environmental regulation must be outcome-focused rather than process-heavy. The Nature Recovery Outcomes would benefit from embedding that principle more clearly.

6. Regulatory Clarity and Non-Statutory Limits

The Management Plan is non-statutory. It should not:

- Pre-empt national consultations or licensing frameworks.
- Establish implied bans beyond existing law.
- Create new quasi-regulatory tests in planning or regulatory contexts.

Nature recovery ambitions must sit within existing statutory frameworks and remain management-neutral unless supported by clear, site-specific evidence.

7. Constructive Recommendations

To strengthen confidence and delivery alignment, we recommend that the Nature Recovery Outcomes:

1. Explicitly state that recovery will be achieved through active, evidence-led management.

2. Recognise lawful land managers as delivery partners.
3. Integrate wildfire resilience within habitat recovery objectives.
4. Include a commitment to adaptive management and review.
5. Confirm the Plan's non-statutory status and limits.

Delivery Capacity and Institutional Realism

The scale and breadth of ambition set out in the Nature Recovery and Climate sections of the Plan are significant. They include landscape-scale peatland restoration, hydrological modification, woodland expansion, species recovery, flood management interventions and climate adaptation measures. However, the Plan does not clearly set out the delivery capacity required to implement and sustain these outcomes over the Plan period. In particular, there is limited clarity regarding:

- The operational capacity of the National Landscape team.
- The technical and field capacity of statutory agencies.
- The availability of skilled contractors for large-scale peatland and hydrological works.
- Long-term monitoring resources.
- Ongoing management funding beyond initial capital interventions.

Ambitious ecological programmes require not only aspiration, but sustained institutional and field-level capability. Where regulatory or land-use transitions are proposed, delivery realism becomes critical. If implementation capacity is insufficient, the result may be:

- Partial or inconsistent restoration.
- Incomplete fuel management during transition.
- Increased wildfire exposure.
- Reduced confidence among land managers.
- Reputational risk to delivery partners.

National scrutiny of environmental regulation has consistently highlighted the risk of ambition exceeding operational capability. Plans that are not matched by realistic delivery pathways can inadvertently shift risk onto land managers while reducing overall ecological effectiveness.
The Plan would therefore be strengthened by:

1. A clear statement of delivery partners and defined roles.
2. Confirmation of resourcing assumptions.
3. Recognition of workforce and contractor constraints.
4. Commitment to phased implementation where capacity is limited.
5. A realistic assessment of what can be achieved within the Plan period.

Environmental ambition is welcome. However, durable nature recovery depends upon sustained capability, coordination and practical expertise on the ground. A clear articulation of delivery capacity will increase confidence that outcomes are achievable rather than aspirational.

Conclusion

The Moorland Association supports the ambition to deliver meaningful nature recovery in the Forest of Bowland. However, we disagree with the Outcomes as drafted because they insufficiently recognise the central role of active land management, stewardship capacity and climate resilience in delivering those ambitions. With clearer emphasis on evidence, proportionality, partnership and adaptive delivery, the Nature Recovery framework could command broader confidence and provide a more robust pathway to achieving shared environmental goals. We remain committed to constructive engagement to ensure recovery objectives are both ambitious and deliverable.

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

Q12) Please add any further comments about the outcomes for People:
The Moorland Association supports the broad intention behind the People Outcomes. These include that the Forest of Bowland should be a place where communities thrive, public understanding increases, access is responsible, and the landscape contributes to wellbeing, education and economic opportunity.

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

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

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

2. Responsible Access and Public Safety
The Management Plan emphasises access and enjoyment. We support responsible access that enhances understanding and wellbeing. However, the Outcomes should explicitly include:
- The importance of biosecurity (livestock disease, wildlife disease).
- The risks associated with wildfire ignition from recreational activity.
- The need for clear messaging around responsible behaviour.
- Recognition of operational constraints during sensitive periods (eg. lambing, ground-nesting bird breeding season, wildfire risk conditions).

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

3. Infrastructure and Operational Needs
Public enjoyment depends upon maintained infrastructure, including:
- Access tracks
- Parking areas
- Signage
- Emergency access routes
- Drainage systems

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

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

4. Economic Contribution of Land-Based Activity
The People Outcomes emphasise local economic vitality, tourism and sustainable enterprise. This is welcome. However, the Plan should explicitly recognise:
- The contribution of agriculture and estate-based management to rural employment.
- The economic multiplier effect of land-based activities.
- The role of private investment in sustaining conservation delivery.

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

5. Avoiding Regulatory Creep Through Social Framing
There is a risk that People Outcomes, if loosely framed, may later be interpreted as justification for:
- Increased informal scrutiny of lawful activities.
- Social pressure to curtail traditional land uses.
- Indirect regulatory expansion via "public interest" arguments.

The Plan should therefore reaffirm:
- Its non-statutory status.
- That it does not create new obligations.
- That lawful land uses remain legitimate components of the landscape.

Clarity reduces conflict and strengthens partnership.

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

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

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

Conclusion
The Moorland Association is broadly supportive of the direction of the People Outcomes but remains neutral overall because key safeguards and recognitions are not yet sufficiently explicit. With clearer emphasis on responsible access, stewardship capacity, economic resilience and regulatory clarity, the People framework could provide a strong foundation for collaboration.

We remain committed to working constructively to ensure that Bowland continues to be a place where people live, work and enjoy the landscape safely and sustainably.

Q13) To what extent do you agree with the outcomes for Place (see p.68):
☑ Neutral

Q14) Please add any further comments about the outcomes for Place:
The Moorland Association recognises that the Place Outcomes seek to strengthen the distinct identity of the Forest of Bowland, support vibrant rural communities, safeguard cultural heritage and ensure that development and infrastructure reflect landscape character. We broadly support those ambitions. However, we remain neutral overall because the Outcomes would benefit from clearer safeguards regarding economic viability, operational infrastructure, regulatory clarity and the treatment of working land uses within the concept of "place". Our comments are set out below.

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

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

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

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

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

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

3. Avoiding Implicit Presumptions Against Land Management
Where Place Outcomes reference landscape quality, tranquillity or cultural change, it is important that they:
- Do not imply that traditional land uses are pressures.

- Do not frame lawful activities as transitional or temporary.
- Avoid signalling downstream regulatory presumptions.

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

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

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

5. Climate Resilience and Public Safety
Place resilience must incorporate:
- Wildfire preparedness.
- Flood management.
- Infrastructure capable of withstanding climate stress.
Climate adaptation is not purely ecological; it is spatial and operational.
The Place Outcomes should therefore integrate climate risk management more explicitly as part of sustaining communities and identity.

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

Protected landscape status must operate within the statutory planning framework, not beyond it. Clear drafting reduces uncertainty and strengthens collaborative delivery.

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

Conclusion

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

Q15) Please use this final text box to share anything else you feel has not been covered or addressed in the plan:
The Moorland Association welcomes the opportunity to comment on the draft Management Plan and recognises the genuine ambition reflected within it. We share the objective of conserving and enhancing the natural beauty of the Forest of Bowland, strengthening ecological resilience, and ensuring the landscape remains nationally significant in both environmental and cultural terms. However, ambition alone does not guarantee delivery. The effectiveness of this Plan will depend not only on the clarity of its ecological objectives, but on the strength of its governance, funding realism, legal robustness and operational practicality.

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

The Forest of Bowland is a living, working landscape. Its character, biodiversity and resilience have developed through active management, sustained investment and practical expertise. Long-term environmental recovery will only succeed if those systems remain economically viable and operationally supported.

Nature recovery, climate adaptation and public safety must be treated as complementary objectives. Transition without safeguards risks unintended ecological, economic and safety consequences. A Plan that embeds adaptive management, proportionality, clear governance boundaries and partnership delivery structures will be stronger, more durable and more widely supported.

The Association believes that the most successful delivery model will be one that:
- Treats land managers as delivery partners.
- Grounds ambition in evidence and practical capacity.
- Integrates ecological outcomes with wildfire resilience and access management.
- Maintains management neutrality unless site-specific evidence justifies change.
- Commits to transparent monitoring and willingness to adjust course where required.

We remain willing to engage constructively with the Partnership and other delivery partners to ensure that the final Plan combines ecological ambition with legal clarity, operational realism and sustainable stewardship.

A Management Plan that balances aspiration with implementation discipline will be far more likely to achieve the outcomes it seeks between 2026 and 2031 - and to retain the confidence of those responsible for managing this nationally important landscape.

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

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

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

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

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

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

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

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

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

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

Adaptation strategies must therefore remain:

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

Blanket prescriptions risk unintended consequences.

3. Economic Viability as an Adaptation Variable
Climate resilience depends upon stewardship capacity. The Plan acknowledges potential viability challenges for farming and moorland systems but does not sufficiently recognise that:

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

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

4. Infrastructure and Public Safety
The Climate Adaptation Plan would benefit from stronger recognition of:

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

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

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

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

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

6. Regulatory Clarity
The Climate Adaptation Plan should reaffirm:

- Its non-statutory status.

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

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

7. Constructive Recommendations
To strengthen the Climate Adaptation Plan, we recommend:
1. Explicit recognition of wildfire as a primary climate risk.
2. Integration of fuel management within adaptation strategy.
3. Clear acknowledgement of economic viability as part of adaptation capacity.
4. Stronger reference to infrastructure and operational resilience.
5. Commitment to adaptive, evidence-led review mechanisms.
6. Clear confirmation of non-statutory limits.

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

Q19) Would you like your name to be displayed alongside your comments?
- Yes
- No (if no, your response will remain anonymous)