

## DRAFT Moorland Association Response

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

### ABOUT YOU

The first three questions are about you and are optional. We strongly recommend completing these because it signals a considered response from someone directly involved. If you are responding on behalf of an estate or organisation, make that clear because it clarifies comments are not a personal opinion.

- 1. In what capacity are you completing this consultation?**
- 2. Name of organisation (if applicable)**
- 3. Do you live and/or work in the North Pennines?**

### THE VISION

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

Disagree

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

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

The North Pennines is a living, working landscape. Its condition and character are the result of active, skilled land management, often delivered through private investment and professional land stewardship, not the withdrawal of management. Any future delivery of the Vision must therefore explicitly safeguard land management capacity, lawful practices, and the economic systems that sustain stewardship, rather than assuming transition, change, or reduced intervention as a default.

The Vision would be strengthened by explicit recognition of the cultural heritage contribution of moorland estates, gamekeeping and driven grouse shooting, alongside farming and other historic land uses. Omission of these systems risks presenting an incomplete and misleading account of how the upland landscape has been shaped and maintained.

The Association therefore stresses that the future resilience, safety and ecological condition of the North Pennines depends on maintaining active, lawful and economically viable land management. Withdrawal or dilution of management should not be assumed to deliver positive outcomes and, in many contexts, would actively undermine them, including through increased wildfire risk and loss of skilled capacity.

### CORE PRINCIPLES

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

Disagree

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

The Moorland Association does not oppose the stated principles in general, but does not accept their application where they are used, explicitly or implicitly, to justify regulatory creep, implied prohibition, or the treatment of non-statutory guidance as de facto policy.

The principles must be applied in a manner that is evidence-led, proportionate, site-specific and

management-neutral. They must not be used to reframe lawful land management as a problem requiring correction.

The Association is concerned that ambiguous wording risks non-statutory guidance or Management Plan aspirations being interpreted or applied as policy. Clear, enforceable boundaries between aspiration, guidance and regulation are essential. Non-statutory plans cannot lawfully narrow, pre-empt or override existing statutory permissions, licensing regimes or lawful land management activities, nor be used to pre-judge the outcome of ongoing or future Defra consultations or regulatory frameworks.

The Plan would be strengthened by clearer governance arrangements setting out how conflicts between public bodies will be resolved in practice. Without defined coordination mechanisms between planning authorities, Natural England, the Environment Agency, Fire & Rescue Services and the National Landscape Partnership, land managers risk being exposed to inconsistent requirements and unmanageable risk.

## **PLANNING & DESIGN**

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

Disagree

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

Disagree

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

The Association does not agree to the Planning & Design Outcomes or Guidelines where these are interpreted or applied in a way that constrains essential land management infrastructure, operational access, safety provision or estate viability.

Any application of Section 85 must remain lawful, proportionate, evidence-based, and subject to proper governance and accountability. The strengthened duty does not create new planning policy, does not override adopted development plans, and must not be treated as a decision-making shortcut. Failure to maintain this distinction risks legal uncertainty, inconsistent decision-making, and loss of trust among land managers.

While the strengthened Section 85 duty is recognised, it does not disapply proportionality, viability, existing use rights or the balanced operation of the planning system. Section 85 must not be applied selectively or used to override lawful land management or to impose constraints beyond adopted development plan policy.

We encourage continued recognition of the functional requirements of land management and estates, including access tracks, drainage, fire response access and operational infrastructure, where sensitively designed and informed by landscape character. These features are essential to safety, stewardship and emergency response, not optional enhancements.

We also stress the importance of ensuring that landscape-led design does not drift into a narrow natural-capital interpretation that prioritises speculative investment models over coherence of landscape character and working land use. Design guidance should support, not displace, long-established land management systems that maintain open moorland character.

*Note to members: you may wish to reference estate access needs or wildfire response routes.*

## **LANDSCAPE CHARACTER**

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

Disagree

### **9b. Why?**

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

The Association does not accept any framing that implies landscape enhancement will be achieved by default through management removal, uniform prescription, or passive change. Any proposed change to landscape character must be justified by site-specific evidence and assessed against its implications for openness, scale, historic pattern and wildfire risk.

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

Disagree

### **9d. Why?**

Landscape Character Measures must be applied with clear safeguards to prevent misuse in decision-making. Open moorland character must not be reinterpreted through climate or natural-capital lenses as a proxy justification for constraining lawful land management.

There is a well-established risk that landscape character objectives are incrementally extended beyond their intended purpose, particularly in planning and consent processes. Measures should therefore be applied proportionately, remain evidence-led, and avoid uniform or assumption-based prescriptions. Clear boundaries are needed to ensure landscape character is not used to pre-empt regulatory decisions or restrict essential land management activity.

*Note to members: this section is important because landscape character arguments are often used in planning decisions.*

## **GEODIVERSITY**

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

Disagree

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

The Moorland Association recognises that soils, peat, hydrology and landform are fundamental to the character, resilience and functioning of the North Pennines. However, the geodiversity of the uplands is not a static or unmanaged asset. Its condition has been shaped and sustained through long-term, active land management.

The Association does not accept interpretations of geodiversity that presume reduced intervention or management withdrawal as a default pathway to improvement. Geodiversity objectives must distinguish clearly between damaging disturbance and purposeful, evidence-based management undertaken to maintain soil stability, hydrological function, access and wildfire resilience.

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

Disagree

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

Geodiversity Measures must be applied in a way that is evidence-led, proportionate and collaborative. They must not be used to justify precautionary restriction of lawful land-management activity in the absence of site-specific evidence of harm.

Clear safeguards are required to ensure consistent and fair application. Evidence thresholds should apply equally to proposed restrictions as to existing lawful practices, and measures should prioritise adaptive

management and monitoring rather than fixed or uniform prescriptions. Without these safeguards, there is a risk that geodiversity measures could be misapplied as a constraint on routine land management, infrastructure maintenance or wildfire adaptation, increasing uncertainty for land managers and undermining effective delivery.

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

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

Disagree

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

The Moorland Association does not agree with the NRI Outcome as framed. It establishes a presumption against established, lawful land management practices (particularly controlled burning) without demonstrating that alternative approaches can manage fuel loads, wildfire risk, access and operational resilience at landscape scale.

The Association does not accept blanket assumptions that management withdrawal delivers better outcomes. Such assumptions are not supported by the evidence base in actively managed upland systems and present clear public safety risks.

We support the objectives around peatland restoration, ecosystem resilience and climate mitigation set out in the NRI narrative. However, support for these objectives does not equate to acceptance of prescriptive or blanket delivery mechanisms. Several elements of the outcome are framed in a way that risks promoting uniform assumptions rather than site-specific, evidence-led land management.

In particular, the proposal to end rotational burning on all peat soils (NRIg) amounts to a default prohibition of an established management tool, rather than recognising the need for locally tailored approaches that take account of peat condition, fuel structure, access constraints and wildfire exposure. A more explicitly conditional and evidence-based outcome is essential for credibility and safety.

In addition, the outcome narrative contains negative references to gamebird releasing without equivalent consideration of its demonstrable benefits, including habitat management investment, predator control, wildfire fuel management, rural employment and long-term stewardship. This imbalance undermines confidence in the plan's neutrality and evidential robustness.

The Plan also underplays the economic reality that many nature recovery outcomes in the uplands are currently underpinned by private sporting investment. Weakening or destabilising these income streams without viable, secured alternatives risks reducing land management capacity rather than enhancing it.

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

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

Strongly Disagree

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

The Moorland Association strongly disagrees with the NRI Measures.

Managed burning is a lawful, regulated and evidence-supported land management tool that contributes to

fuel load control, wildfire risk reduction, habitat structure and public safety in specific upland contexts. The Association does not accept any presumption against controlled burning on peat soils. Any proposal to restrict or end its use must meet the same evidential threshold required to justify the continuation of existing lawful practices.

The Measures fail to explain how fuel continuity, wildfire exposure, emergency access and Fire & Rescue Service capacity will be managed during any transition. This is a critical policy omission with direct public safety implications.

The draft plan places a strong and explicit policy direction on ending controlled burning on all peat soils (NR1g), while treating burning as a supplementary tool only (NR1e), yet simultaneously relies on effective wildfire mitigation (NR1h) without explaining how this will be delivered in practice.

This creates a clear internal tension between strategic ambition and operational reality. Without robust mechanisms, there is a high likelihood that wildfire exposure will increase in the short- to medium-term.

While wildfire mitigation plans are referenced, the Plan does not explain:

- how fuel load and continuity will be assessed and managed at landscape scale;
- how Fire & Rescue Service capacity, access and response times will inform management decisions;
- how professional judgement and lawful, licensed management tools will be treated during transition.

Wildfire risk must be treated explicitly as a public safety and emergency planning issue, not solely as an ecological consideration. Ecological objectives cannot be pursued in isolation from emergency response realities.

Public safety considerations extend beyond wildfire alone. Estate infrastructure, staff presence and access routes underpin emergency response, search and rescue, and incident management, yet these functions are not acknowledged.

The Plan also lacks explicit recognition of biosecurity and disease risk. Increased access and habitat intervention elevate risks to livestock health, wildlife disease, invasive species and tick-borne illness, which should be addressed explicitly within NR1.

**Gamebird releasing, predator control and medicated grit.** The Plan contains negative or cautionary references to gamebird releasing without a balanced assessment of its role within contemporary upland management systems. While potential risks are implied, the Plan does not acknowledge associated benefits including sustained management presence, habitat investment, predator control, access maintenance and wildfire prevention.

Predator control and medicated grit are acknowledged as components of moorland management. The Moorland Association supports the lawful, responsible and targeted use of medicated grit as a legitimate animal health intervention, delivered in line with existing regulation and best practice.

However, the Plan refers to these practices in a manner that raises concern without providing clarity or policy coherence. It does not set out:

- clear outcomes or objectives against which use would be assessed;
- any monitoring, assurance or governance framework;
- how these practices relate to planning, consents or future funding mechanisms.

Ambiguous or cautionary references to lawful practices risk creating implied stigma without evidence. Any reference must be explicitly neutral, outcome-linked and evidence-based, and must not allow compliant land managers to be treated as suspect by default.

**Suggested strengthening of the plan.** We therefore consider that the NR1 Measures should be strengthened by:

- explicitly recognising the lawful and regulated role of gamebird releasing within upland land management, alongside potential risks;
- clearly distinguishing responsible, compliant practice from unlawful behaviour; and
- acknowledging both benefits and trade-offs, rather than implying harm by default.

This would improve balance, legal robustness and stakeholder confidence, while supporting effective delivery of nature recovery objectives.

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

### **I2a. To what extent do you agree with the Nature Recovery NRI Peatland and Heathland Measures, in general?**

Neither agree nor disagree

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

The Association does not oppose the objective of supporting wading bird populations, but does not accept Outcomes that imply a single preferred management philosophy.

Evidence demonstrates that wader recovery in many upland contexts has been delivered through active land management, including grazing regimes, habitat mosaics and lawful predator control. These approaches should be recognised as core delivery mechanisms, not conditional or residual options.

The overarching ambition to halt decline and secure the long-term recovery of upland wading bird populations aligns with the Association's long-standing recognition of the national importance of England's uplands for species such as curlew, lapwing and golden plover. The focus on population resilience, breeding success and favourable habitat condition is therefore welcomed.

However, this agreement is qualified. The Association considers it essential that the Outcomes are framed in a way that remains evidence-led and management-neutral, recognising that in many upland contexts wader recovery has been achieved through active, long-established land management systems. Outcomes should avoid implying that recovery is contingent on a single management philosophy, and instead allow for multiple delivery pathways where these are demonstrably effective.

It is important that the Plan explicitly recognises predator-prey balance as an ecological function where supported by evidence. Predator control should not be framed solely as a tolerated management choice, but as one of several legitimate tools that may be required to achieve species recovery in specific upland contexts.

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

Neither agree nor disagree

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

While the intent of the Measures is supported, they risk privileging certain approaches without sufficient recognition of existing management systems already delivering positive outcomes.

Measures implying change or restriction must be subject to the same evidential scrutiny as existing lawful practices, rather than assuming harm by default. Without this symmetry, confidence in delivery will be undermined.

In particular, the Association is concerned that the Measures risk privileging certain approaches without sufficiently acknowledging the role of active upland management, including habitat mosaics, grazing regimes

and lawful predator control, which the evidence base indicates can be critical to wader breeding success. To be effective and credible, the Measures should explicitly recognise existing management systems that are already delivering positive outcomes, set clear evidence thresholds where changes are proposed, and ensure that implementation does not inadvertently undermine the ecological and economic foundations that currently support key wading bird populations.

Measures implying change or restriction should be subject to the same evidential scrutiny as existing lawful practices, rather than assuming harm by default.

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

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

Disagree

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

The Moorland Association does not agree with the NR3 Trees and Scrub Outcome. As framed, it risks promoting a presumption in favour of tree and scrub expansion in landscapes where openness is itself a priority habitat condition.

Large areas of the North Pennines are internationally important open habitats, including blanket bog, heathland and species-rich grasslands, whose ecological value depends on the continued absence of extensive tree and scrub cover. These landscapes are not degraded or transitional and should not be treated as default opportunities for woodland or scrub establishment.

The Plan references pheasants under NR3 as a factor affecting habitat condition and establishment success. However, these references are narrowly framed and do not reflect the wider role that gamebird management plays in shaping how trees and scrub are designed, located and managed on working estates. From a land-management perspective, pheasants are a material consideration in decisions about woodland layout, fencing, maintenance requirements and long-term viability, and this should be acknowledged within the Outcome narrative.

Poorly targeted tree and scrub expansion risks displacing priority open-habitat species, increasing wildfire fuel continuity, damaging peat soils and undermining long-established land-management systems that currently deliver biodiversity, carbon storage, landscape character and rural employment. A more defensible Outcome would explicitly protect priority open habitats and require site-specific ecological justification for any proposed tree or scrub establishment.

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

Strongly Disagree

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

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

Although pheasants are acknowledged within the Plan as a factor influencing tree and scrub establishment, the Measures treat pheasants largely as a localised pressure rather than as part of the wider land-management context. This framing risks unrealistic expectations about establishment success, fencing requirements, maintenance costs and long-term woodland viability on working estates.

The Measures do not clearly distinguish between areas where trees or scrub may be beneficial (such as sheltered cloughs, riparian corridors or lower slopes) and areas where establishment would be actively

harmful, including peatlands and priority open habitats. Without a clear spatial hierarchy, governance framework and defined long-term management responsibility, the Measures risk incentivising short-term planting that increases wildfire risk, damages soils and transfers ongoing liabilities to land managers.

The Measures should therefore be reframed to require clear ecological justification, site-level assessment and alignment with existing land-management plans, while explicitly recognising the role of active land management (including grazing, vegetation control and gamebird management) in maintaining habitat diversity, establishment realism and long-term landscape resilience.

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

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

Disagree

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

The Moorland Association does not oppose the objective of improving river and stream condition. However, the Outcome risks implying that reduced management or uniform intervention will deliver improvement, particularly in upland headwaters where watercourses are closely integrated with long-established land-management systems.

Many moorland estates already deliver public benefit through peatland restoration, grip management, appropriate grazing, responsible keepering and associated estate infrastructure. These activities, often supported by private sporting investment including gamebird management, play a role in maintaining access, hydrological function, monitoring capacity and rapid response to incidents. This contribution should be explicitly recognised rather than implicitly problematised.

River and stream restoration must align with wildfire risk management, emergency access and the operational realities of working estates. Hydrological change is not risk-free and should not be pursued in isolation from its implications for peat stability, fuel continuity, access routes and land-management capacity. Delivery should therefore be evidence-led, locally tailored and collaborative.

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

Disagree

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

The Association does not agree with the NR4 Measures as framed. Measures must be voluntary, evidence-led and aligned with existing land-management systems, rather than assuming reduced intervention or constraint as a default pathway.

In upland headwaters, interventions affecting water levels, channels or riparian zones can have unintended consequences, including moorland drying, loss of access for management and emergency response, and increased wildfire risk. These risks are mitigated in practice through active estate management, staff presence and maintained infrastructure, often underpinned by private investment associated with farming and gamebird management.

The Measures currently lack sufficient clarity on governance, proportionality and long-term responsibility. Without clear safeguards, there is a risk that well-intentioned river restoration activity could undermine the very management capacity on which effective delivery, monitoring and maintenance depend. Measures should therefore require site-specific assessment, clear evidence thresholds, and alignment with existing land-management plans, rather than relying on assumption-based or standardised approaches.

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

### **15a. To what extent do you agree with the Nature Recovery NR5 Grasslands Outcome, in general?**

Disagree

#### **15b. Why do you feel this way?**

The Moorland Association does not oppose the objective of maintaining and enhancing grassland biodiversity. However, the NR5 Grasslands Outcome risks implying that reduced management or uniform intervention will deliver improvement, without adequate recognition that many upland grasslands are semi-natural systems sustained through long-term active management.

Across the North Pennines, grasslands have developed under locally adapted grazing, mowing and nutrient regimes. Their ecological value depends on continued, appropriately tailored intervention rather than management withdrawal or passive change. Outcomes should therefore explicitly recognise the diversity of grassland types present and avoid framing reduced grazing or abandonment as a default or desirable pathway.

### **15c. To what extent do you agree with the Nature Recovery NR5 Grasslands Measures, in general?**

Neither agree nor disagree

#### **15d. Why do you feel this way?**

The Association does not agree with the NR5 Grasslands Measures as framed. Several measures appear overly prescriptive and insufficiently sensitive to local variation in soils, altitude, climate and farming systems, increasing the risk of unintended ecological and economic consequences.

Measures that imply change or restriction must be supported by clear, site-specific evidence and aligned with existing management systems and agri-environment schemes. Reduced grazing or abandonment should not be treated as neutral interventions, as they can undermine habitat condition, increase fire fuel continuity and weaken farm viability if applied without careful assessment.

The Measures should therefore prioritise adaptive management, clear evidence thresholds and long-term support for existing stewardship, rather than standardised prescriptions that risk discouraging the very management practices on which upland grassland condition depends.

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

### **16a. To what extent do you agree with the Nature Recovery NR6 Wetlands Outcome, in general?**

Disagree

#### **16b. Why do you feel this way?**

The Moorland Association does not oppose the objective of maintaining and enhancing upland wetlands. However, the NR6 Wetlands Outcome risks implying that reduced management or uniform intervention will deliver improvement, without sufficient recognition that many upland wetland systems are sustained through long-term active land management.

Across the North Pennines, wetlands coexist with grazing, moorland management and other legitimate land uses, often supported by long-term private investment by estates and farmers. Their ecological condition varies considerably with soil type, altitude and hydrology, and outcomes should therefore avoid default restoration pathways or prescriptive assumptions. Effective wetland outcomes require locally tailored, evidence-based approaches that work with existing management systems rather than displacing them.

**16c. To what extent do you agree with the Nature Recovery NR6 Wetlands Measures, in general?**

Neither agree nor disagree

**16d. Why do you feel this way?**

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

Capital works alone are unlikely to deliver durable outcomes without sustained management capacity and funding. Without clear governance, monitoring and long-term maintenance arrangements, wetland measures risk creating future liabilities for land managers or undermining existing sustainable management. The Measures should therefore prioritise site-specific assessment, adaptive management and alignment with existing land-management plans, rather than blanket assumptions or standardised prescriptions.

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

**17a. To what extent do you agree with the Nature Recovery NR7 Birds of Prey Outcome, in general?**

Disagree

**17b. Why do you feel this way?**

The Association does not oppose the Outcome, but does not agree to framing that implies causation or land management impact without robust, site-specific evidence. Moorland estates already provide extensive, suitable habitat that supports a wide range of raptor species. Outcomes should recognise the contribution of active upland management to habitat quality, prey availability, and landscape resilience. Delivery must be evidence-led and avoid assumptions about causation where populations are influenced by multiple ecological factors. Partnership working with land managers is essential to achieving these outcomes in practice.

**17c. To what extent do you agree with the Nature Recovery NR7 Birds of Prey Measures, in general? (optional)**

Disagree

**17d. Why do you feel this way?**

The Association does not agree with the Measures. Monitoring and protection must not duplicate or extend enforcement regimes by implication. Collaborative, evidence-led approaches are required.

While monitoring, protection, and habitat improvement are appropriate in principle, measures must be proportionate, clearly evidenced, and aligned with existing regulatory frameworks. Measures should avoid duplication of enforcement regimes and should not imply land management impacts without robust local data. Greater emphasis is needed on collaborative monitoring, transparency and shared objectives rather than prescriptive or punitive approaches.

We emphasise again the need for consistent evidence standards and for collaborative monitoring approaches that avoid duplicative or punitive regimes.

## **CHAMPION SPECIES**

**18a. To what extent do you agree with the Nature Recovery Champion Species Outcome, in general? (optional)**

Disagree

**18b. Why do you feel this way?**

The Association does not oppose the objective but we do not agree with Outcomes that fail to recognise existing management contributions or that introduce prescriptive delivery assumptions. The Moorland Association supports the principle of conserving and enhancing champion species. The MA also recognises the importance of flagship species in promoting public engagement with nature recovery.

However, outcomes are currently framed at too high a level and lack sufficient recognition of existing management contributions. There is limited acknowledgement that many champion species persist because of long-term moorland management.

Clearer links are needed between desired outcomes, baseline conditions and practical land use.

**18c. To what extent do you agree with the Nature Recovery Champion Species Measures, in general?**

Disagree

**18d. Why do you feel this way?**

The Association does not oppose the concept of champion species but does not agree with Measures that fail to recognise existing management contributions or that introduce prescriptive delivery assumptions.

Several measures risk being overly prescriptive and insufficiently evidence-led. There is a lack of clarity on how trade-offs between species, habitats, wildfire risk and land management will be resolved. Measures do not adequately account for site-specific conditions or existing lawful management. Greater emphasis is needed on adaptive management, monitoring, and partnership with land managers

## **DARK NIGHT SKIES**

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

Agree

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

The MA supports the protection of dark night skies as a core special quality of the North Pennines. Dark skies support tranquillity, wildlife, land management and rural tourism. The outcomes broadly reflect existing good practice in upland areas. They are proportionate and aligned with the character of working landscapes.

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

Neither agree nor disagree

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

The MA supports measures that reduce unnecessary lighting and light spill. Clear design principles are helpful for planning and decision-making. However, measures must remain flexible for land management, farming and safety needs. Implementation should avoid excessive regulation or retrospective constraints.

## **CULTURAL HERITAGE**

**20a. To what extent do you agree with the Cultural Heritage CH1 Knowledge about Heritage Outcome, in general?**

Agree

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

The Moorland Association supports the aim to improve knowledge and understanding of cultural heritage. The outcome recognises the value of lived and working landscapes.

We welcome the focus on intangible cultural heritage under CH2. However, the draft does not explicitly recognise moorland estates, gamekeeping, or driven grouse shooting as living cultural heritage. These practices have played a long-standing role in shaping the upland landscape. Modest wording changes would improve balance, trust and legal robustness.

Professional land management, including moorland estates, gamekeeping and driven grouse shooting, represents living cultural heritage rather than historic relics. These systems continue to shape landscape character today through skilled, intergenerational practice and should be explicitly recognised as such.

**20c. To what extent do you agree with the Cultural Heritage CH1 Knowledge about Heritage Measures, in general?**

Agree

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

The Moorland Association broadly supports the proposed measures. They encourage learning, engagement and shared understanding.

Measures would be stronger if they explicitly recognised land managers and gamekeepers as holders of cultural heritage knowledge. Clear recognition of established moorland practices would support collaboration and delivery. Proportionate and inclusive wording would improve confidence among those managing the landscape.

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

Agree

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

The Moorland Association supports the recognition of intangible heritage in principle. The emphasis on skills, traditions, and knowledge passed between generations is welcome. This reflects how upland landscapes are actively shaped by people over time.

However, the outcome would be stronger if it explicitly recognised moorland estates, gamekeeping, and associated land management as living cultural heritage. These practices remain active and contribute directly to landscape character, biodiversity, and rural communities.

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

Agree

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

The measures are broadly appropriate and proportionate. They encourage documentation, awareness and intergenerational transfer of knowledge. This approach aligns with long-term landscape stewardship.

However, the measures risk being incomplete if they focus mainly on community narratives and volunteer activity. They should also recognise professional land managers and estate workers as key holders of intangible heritage.

Clearer inclusion would improve balance and trust.

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

Agree

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

The MA broadly supports the CH3 Physical Features Outcome. The focus on conserving historic buildings, archaeological features, walls and field patterns is appropriate. Many of these features persist only because they are actively maintained through land management.

This ongoing stewardship should be more clearly acknowledged in CH3. Clear recognition would better reflect how the upland landscape is sustained in practice.

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

Agree

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

The MA supports the intent of the CH3 Measures. The emphasis on protection, repair and sensitive adaptation is welcome. Many physical heritage features, including walls, tracks, and buildings, depend on routine management.

Measures should therefore support active maintenance, not unintentionally constrain it. Greater clarity would help ensure measures remain practical and proportionate for land managers.

## **ACCESS & ENGAGEMENT (AE1-AE5)**

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

Disagree

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

The Association does not oppose engagement objectives but does not agree to Outcomes that increase access pressure without explicit safeguards for land management, biosecurity, wildfire risk and public safety.

Improved access can support understanding and enjoyment of the landscape. However, access must be proportionate, well-managed, and compatible with land management, conservation, and safety on working moorland. Active land management underpins much of the landscape people come to enjoy and should be clearly recognised.

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

Disagree

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

The Association does not agree with the Measures. Increased access brings increased responsibility, cost and liability. Measures must explicitly recognise the role of estates in managing these risks and must not create new burdens by default.

The Measures should place stronger emphasis on responsible access, clear governance and resourcing. They should also recognise that many access routes, infrastructure and visitor experiences depend on ongoing private investment and active land management. Without this balance, there is a risk of unintended impacts

on wildlife, habitats and working estates.

Increased access also brings increased responsibility. Measures should explicitly address visitor safety, emergency access, disease transmission and biosecurity, recognising the role that managed estates play in mitigating these risks.

The Plan must not externalise the costs, risks or liabilities of increased access onto land managers by default. Estates already provide access infrastructure, informal supervision, emergency access and incident support at private cost. Access ambitions must not create new duties, expectations or liabilities without consent, resourcing and clear governance.

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

Disagree

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

The Association does not oppose engagement objectives but does not agree to Outcomes that increase access pressure without explicit safeguards for land management, biosecurity, wildfire risk and public safety.

The Moorland Association broadly agrees with the aim of providing a welcoming environment for visitors and residents. Land managers already play a key role in welcoming people, maintaining access, and supporting responsible enjoyment of the countryside.

It is important that the outcome recognises this existing contribution and balances welcome with safety, land management needs and environmental protection.

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

Disagree

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

The Association does not agree with the Measures. Increased access brings increased responsibility, cost and liability. Measures must explicitly recognise the role of estates in managing these risks and must not create new burdens by default.

The Moorland Association supports the intent of the measures but they should be applied flexibly and proportionately. Measures should recognise that many welcome functions are delivered informally by landowners and estates. They should avoid creating new burdens or expectations that could undermine land management, biosecurity or wildlife interests.

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

Disagree

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

The Association does not oppose engagement objectives but does not agree to Outcomes that increase access pressure without explicit safeguards for land management, biosecurity, wildfire risk and public safety.

The MA broadly supports the intention to improve how stories and information about the landscape are shared. Clear and accurate interpretation can help visitors understand the working nature of the uplands and the role of active land management. We consider it important that stories reflect the full range of people and practices that shape the landscape, including moorland estates and gamekeeping. Balanced storytelling will support understanding, trust and responsible engagement.

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

Disagree

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

The Association does not agree with the Measures. Increased access brings increased responsibility, cost and liability. Measures must explicitly recognise the role of estates in managing these risks and must not create new burdens by default.

The MA supports measures that improve access to information and interpretation in principle. However, delivery should ensure accuracy, balance and evidence-based messaging. Measures should avoid overly selective narratives and should recognise land managers as active custodians of the landscape. Ongoing involvement of those who manage the land would strengthen credibility and effectiveness.

Interpretation should avoid selective narratives. Balanced storytelling is essential to public understanding, trust and responsible behaviour.

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

Disagree

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

The Association does not oppose the objective but does not agree to Outcomes that increase access pressure without explicit safeguards for land management, biosecurity, wildfire risk and public safety.

The Moorland Association supports the aim of encouraging young people to engage with the landscape. Early connection with the countryside can build understanding, skills and long-term stewardship.

The Outcome would be stronger if it more clearly recognises the role of working land, land managers and rural businesses in providing real-world learning and experience for young people.

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

Disagree

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

The Association does not agree with the Measures. Increased access brings increased responsibility, cost and liability. Measures must explicitly recognise the role of estates in managing these risks and must not create new burdens by default.

The Moorland Association broadly supports the Measures, particularly those that promote education, skills and participation. The Measures should be delivered in partnership with land managers and estates. They should avoid approaches that are overly prescriptive or that increase access pressures without adequate management. A balanced approach will help ensure benefits for young people and for the landscape.

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

Disagree

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

The Association does not oppose the objective but does not agree to Outcomes that increase access pressure without explicit safeguards for land management, biosecurity, wildfire risk and public safety.

The Moorland Association supports the intention to strengthen relationships across the landscape. Effective delivery depends on trust, mutual respect, and long-term engagement with land managers and rural businesses. Outcomes should recognise that many positive relationships already exist and should build on these, rather than replace them with new or duplicative structures.

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

Disagree

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

The Association does not agree with the Measures. Increased access brings increased responsibility, cost and liability. Measures must explicitly recognise the role of estates in managing these risks and must not create new burdens by default.

The Moorland Association supports practical measures that encourage collaboration and shared problem-solving. Measures should be proportionate, inclusive, and grounded in local knowledge. They should also recognise the time and resource constraints faced by land managers and avoid unnecessary process or reporting burdens.

## CLIMATE ADAPTATION

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

Disagree

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

The Moorland Association recognises the need for resilient landscapes and communities under climate change. However, the draft plan gives greater and more explicit weight to flooding than to wildfire. Given the increasing frequency and severity of upland wildfires, clearer recognition of wildfire as a distinct climate risk would strengthen the outcome and improve balance.

Climate adaptation measures place significant additional expectations on land managers. The Plan does not yet assess whether sufficient land-management capacity exists to deliver these expectations simultaneously, nor how that capacity will be retained during transition.

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

Disagree

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

The Association does not agree with the Measures as framed. Climate adaptation must be operationally deliverable, evidence-led and aligned with wildfire mitigation, access and land management capacity.

The measures strongly emphasise flood risk management and catchment processes. By contrast, wildfire is addressed only indirectly. More explicit measures on wildfire prevention, fuel management, and preparedness would improve effectiveness and reflect current and future climate risks in upland landscapes.

Adaptive management must include clear review triggers and contingency options. Without these, the risk of unintended consequences (particularly wildfire risk) increases.

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

We recognise the intent but note significant unresolved risks and collaborative intent of the draft Management Plan. With modest clarification and strengthening in key areas, the plan has the potential to provide a robust and effective framework for delivery.

However, the Plan currently lacks a transparent delivery and cost model and does not clearly set out how long-term liabilities will be managed once public funding or pilot schemes end.

There is insufficient clarity on how economic transition risks will be managed if alternative income streams do not materialise at scale or pace.

Finally, the Association emphasises that the Management Plan should be applied strictly within its statutory status and must not be relied upon to extend regulatory expectations or constrain lawful land management beyond existing legal frameworks.