

## Moorland Association

### Members' Guide – North Pennines National Landscape Management Plan (2026-2031)

#### ABOUT YOU

##### 1. In what capacity are you completing this consultation? (optional)

**What this question is really about:** This question is intended to show who is responding and whether comments are coming from people with direct responsibility for land, businesses or management decisions.

**What members may want to consider:** The MA encourages land managers, estate owners and those with operational responsibility to make this clear, as the Plan has implications for management capacity, safety and investment.

##### 2. Name of organisation (if applicable) (optional)

**What this question is really about:** This allows responses to be understood as either personal views or views expressed on behalf of an organisation.

**What members may want to consider:** Naming an estate, farm or business helps demonstrate that comments are grounded in real management responsibilities.

##### 3. Do you live and/or work in the North Pennines? (optional)

**What this question is really about:** This question establishes the degree of local connection and practical experience.

**What members may want to consider:** The MA is concerned that decisions could be influenced by respondents with limited on-the-ground experience, so indicating local involvement is helpful.

#### THE VISION

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

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question asks whether the long-term Vision sets an appropriate direction for the future management of the North Pennines.

**What members may want to consider:** The MA is concerned that the Vision risks implying that reduced management, land-use change or “transition” away from existing practices is inherently desirable. Members may wish to emphasise that the North Pennines is a living, working landscape whose environmental condition has been shaped by active, lawful management, supported by private investment and skilled labour. There is also concern that economic viability and public safety, including wildfire risk, are insufficiently recognised.

**△ Higher-risk question:** The Vision may later be used to justify policy direction or funding priorities.

#### **5. Why do you feel this way? (optional)**

**MA suggested response:** Members may wish to explain that while they support conserving and enhancing natural beauty, they cannot support a Vision that implies management withdrawal, land abandonment or fundamental change to lawful land uses without clear evidence, government policy backing or long-term funding.

**What this question is really about:** This provides space to explain disagreement constructively.

**What members may want to consider:** The MA is concerned that unmanaged land can increase wildfire risk, reduce habitat diversity and erode local skills and capacity. Traditional land uses such as farming and moorland management are central to the area's character and current conservation outcomes and should be recognised as such.

### **CORE PRINCIPLES**

#### **6. To what extent do you agree with the Core Principles? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question tests whether the overarching principles provide a sound and fair basis for future action.

**What members may want to consider:** The MA is concerned that some principles are framed in ways that could justify regulatory creep, implied prohibitions or the treatment of non-statutory guidance as de facto policy. Members may wish to stress that principles must be applied in an evidence-led, proportionate and management-neutral way. They must not pre-judge lawful land uses as problems.

#### **7. Why do you feel this way? (optional)**

**MA suggested response:** Members may wish to explain that while the principles are well-intentioned, they require clearer safeguards to ensure they do not expand regulatory expectations beyond existing law or undermine lawful land management.

**What this question is really about:** This allows respondents to explain concerns about how principles could be interpreted in practice.

**What members may want to consider:** The MA is concerned about ambiguity that could allow aspiration or guidance to be treated as binding policy. Members may wish to emphasise that AONB/National Landscape plans are guidance documents, not regulatory instruments and must not override statutory processes or ongoing Defra consultations.

### **PLANNING & DESIGN**

#### **8a. Planning & Design Outcome (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This asks whether planning outcomes appropriately balance landscape protection with practical needs.

**What members may want to consider:** The MA is concerned that planning outcomes could be used to constrain essential land-management infrastructure such as tracks, buildings, fences and safety features, despite these being integral to managing a working landscape.

#### **8b. Planning & Design Guidelines (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This tests support for the draft design guidance.

**What members may want to consider:** Members may wish to note that while good design is supported, guidelines must not become a backdoor veto on necessary infrastructure or lawful land management.

#### **8c. Detailed comments (optional)**

MA suggested response: Members may wish to explain that design guidance must actively accommodate functional requirements of land management, safety and community needs, and must not be used to impose blanket restrictions or misuse the strengthened Section 85 duty.

### **GEODIVERSITY**

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

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This asks whether geodiversity objectives are framed appropriately.

**What members may want to consider:** The MA supports conserving soils, peat and landform but is concerned about interpretations that treat geodiversity as a 'hands-off' asset. Members may wish to emphasise that active, evidence-based management is often necessary to maintain soil stability, hydrology and wildfire resilience.

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

MA suggested response: Members may wish to explain that geodiversity objectives must distinguish between harmful disturbance and purposeful management undertaken to protect soils, water and access.

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

**MA suggested response:** ☒ Neither agree nor disagree

**10d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to stress that measures implying new restrictions must be evidence-led and proportionate, and should not assume existing practices are harmful without site-specific evidence.

**NATURE RECOVERY – PEATLAND & HEATHLAND (NR1)**

**11a. To what extent do you agree with the Nature Recovery NR1 Peatland and Heathland Outcome, in general? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This asks whether peatland and heathland outcomes strike the right balance between restoration and management.

**What members may want to consider:** The MA is concerned that the Outcome establishes a presumption against lawful management practices, particularly controlled burning, without demonstrating that alternatives can manage fuel loads, wildfire risk and access at landscape scale.

**11b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that while peatland restoration is supported, blanket assumptions that management withdrawal is beneficial are not evidence-based and present public safety risks. The Plan should set goals without prescribing universal bans beyond existing law.

**NATURE RECOVERY – WOODLAND & SCRUB (NR3)**

**13a. To what extent do you agree with the Nature Recovery NR3 Woodland and Scrub Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This asks whether woodland and scrub expansion is framed appropriately.

**What members may want to consider:** The MA supports well-sited woodland creation but is concerned about lack of clarity on where planting is appropriate and how long-term management and liabilities will be addressed.

**13b. Why do you feel this way? (optional)**

**MA suggested response:** Members may wish to explain that woodland creation must be evidence-led, site-specific and aligned with existing land management systems and must not undermine open habitats of high value.

**13c. To what extent do you agree with the Nature Recovery NR3 Woodland and Scrub Measures, in general? (optional)**

**MA suggested response:** ☒ Strongly disagree

**13d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that the Measures are overly prescriptive, lack safeguards on siting, governance and long-term responsibility, and risk transferring ecological and financial liabilities to land managers without clear funding or accountability.

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

### **14a. To what extent do you agree with the Nature Recovery NR4 Rivers and Streams Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This asks whether river restoration objectives are sound.

**What members may want to consider:** The MA is concerned that the Outcome risks implying reduced management as a default, without recognising the role estates already play in catchment management, access and rapid response to problems.

### **14b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that river and stream restoration must be planned alongside wildfire risk, access needs and operational realities and must work with existing land management rather than against it.

### **14c. To what extent do you agree with the Nature Recovery NR4 Rivers and Streams Measures, in general? (optional)**

**MA suggested response:** ☒ Disagree

### **14d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to state that measures must be voluntary, evidence-led and integrated with land management, rather than imposing uniform or precautionary constraints.

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

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

**MA suggested response:** ☒ Neither agree nor disagree

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

MA suggested response: Members may wish to explain that many upland wetlands are maintained through active management and that restoration should be locally tailored, partnership-based and not assume a hands-off approach is always best.

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

**MA suggested response:** ☒ Disagree

**16d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight concerns about unfunded future liabilities, lack of clarity over long-term responsibility, and the risk that capital works are promoted without sustained management or funding.

**NATURE RECOVERY – SPECIES & ECOLOGICAL NETWORKS (NR5)**

**17a. To what extent do you agree with the Nature Recovery NR5 Species and Ecological Networks Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the Plan's approach to species recovery and ecological connectivity is appropriately framed.

**What members may want to consider:** The MA supports efforts to improve species outcomes but is concerned that the Outcome may be interpreted as favouring reduced management or uniform interventions. Many species present in the North Pennines depend on active land management, including grazing, predator control and habitat management, and these contributions should be clearly recognised.

**17b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that species recovery should be delivered through evidence-based, locally tailored management in partnership with land managers, rather than assumptions that reduced intervention will automatically deliver better outcomes.

**17c. To what extent do you agree with the Nature Recovery NR5 Species and Ecological Networks Measures, in general? (optional)**

**MA suggested response:** ☒ Disagree

**17d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight concerns that the Measures lack sufficient clarity on delivery, responsibility and long-term management, and risk placing additional burdens on land managers without clear funding or accountability.

**NATURE RECOVERY – FARMING & LAND MANAGEMENT SUPPORT (NR7)**

**18a. To what extent do you agree with the Nature Recovery NR7 Farming and Land Management Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether farming and land management are appropriately positioned within nature recovery objectives.

**What members may want to consider:** The MA is concerned that farming is sometimes framed as something that needs correcting rather than as a core part of delivering environmental outcomes. Members may wish to stress that viable farming and estate

management underpin biodiversity, landscape character and community resilience in the North Pennines.

**18b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that nature recovery depends on supporting those who manage the land, and that outcomes should reinforce economic viability and management capacity rather than undermine them.

**18c. To what extent do you agree with the Nature Recovery NR7 Farming and Land Management Measures, in general? (optional)**

**MA suggested response:** ☒ Disagree

**18d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight that measures must be realistic, properly resourced and voluntary, and should not impose additional obligations or costs without clear benefits and long-term support.

**HISTORIC ENVIRONMENT & CULTURAL HERITAGE (HE1)**

**19a. To what extent do you agree with the Historic Environment and Cultural Heritage Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the Plan appropriately recognises and supports the historic environment.

**What members may want to consider:** The MA supports conserving historic features but is concerned that heritage objectives could be used to restrict necessary land management or infrastructure. Members may wish to emphasise that many historic features are best conserved through continued use and active management.

**19b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that heritage conservation should work with land managers and avoid creating new constraints or costs that discourage upkeep and stewardship.

**PHYSICAL HERITAGE & BUILT FEATURES (HE2)**

**20a. To what extent do you agree with the Physical Heritage Measures, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question tests whether measures to protect physical heritage are practical and proportionate.

**What members may want to consider:** The MA is concerned that measures could unintentionally create barriers to maintaining tracks, walls, buildings or other features essential for land management, access and safety. Members may wish to stress that those actively managing the land are often best placed to conserve physical heritage.

**20b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to emphasise that heritage measures should support, not hinder, those responsible for ongoing maintenance and should avoid imposing additional costs or administrative burdens.

**20c. To what extent do you agree with the Physical Heritage Measures, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the detailed measures proposed to protect and manage physical heritage assets are workable in practice.

**What members may want to consider:** The Moorland Association supports the conservation of physical heritage features such as walls, tracks, buildings and historic infrastructure. However, it is concerned that measures could be applied in ways that unintentionally restrict routine maintenance, necessary upgrades or essential land management activity. Members may wish to emphasise that many physical heritage features are only preserved because they remain functional and actively maintained as part of working land management systems.

**20d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that physical heritage measures should be applied flexibly and proportionately, in partnership with land managers, and should not create additional regulatory burdens or costs. The MA is concerned that overly rigid interpretation could discourage maintenance or lead to deterioration of heritage assets, rather than their conservation.

**COMMUNITY, ECONOMY & LAND MANAGEMENT****21a. To what extent do you agree with the Community and Economy Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the Plan's approach to supporting communities and the rural economy is realistic and appropriately grounded.

**What members may want to consider:** The MA is concerned that outcomes may emphasise aspiration without sufficient recognition of how rural businesses, estates and land-based enterprises actually function. Members may wish to stress that viable land management businesses are fundamental to sustaining communities, employment and environmental stewardship in the North Pennines.

**21b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that community resilience depends on economically viable farming, estates and rural businesses, and that outcomes should support existing enterprises rather than assume replacement by new or untested income streams.

**21c. To what extent do you agree with the Community and Economy Measures, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the detailed measures proposed to support communities and the rural economy are realistic and deliverable.

**What members may want to consider:** The Moorland Association is concerned that measures may focus heavily on aspiration without sufficient consideration of how rural businesses actually operate or generate income. Members may wish to stress that measures should strengthen existing land-based enterprises and employment, rather than assuming that new activities or funding streams will automatically replace them.

**21d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that community resilience depends on economically viable farming, estates and rural businesses. Measures should be practical, properly resourced and designed to support those already sustaining local economies, rather than adding complexity or uncertainty.

**FARMING, FOOD & RURAL ENTERPRISE**

**22a. To what extent do you agree with the Farming, Food and Rural Enterprise Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether farming and rural enterprise are appropriately recognised within the Plan.

**What members may want to consider:** The MA is concerned that farming can be portrayed primarily as a pressure to be managed rather than as a cornerstone of landscape character, food production, employment and environmental delivery. Members may wish to emphasise that upland farming systems are already delivering public benefits and need support to remain viable.

**22b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that environmental outcomes depend on farmers and land managers having the confidence, resources and flexibility to continue managing the land. Outcomes should reinforce, not undermine, farm viability.

**22c. To what extent do you agree with the Farming, Food and Rural Enterprise Measures, in general? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question tests whether the proposed measures are practical and proportionate at farm and estate level.

**What members may want to consider:** The MA is concerned that some measures could impose additional expectations or costs without clear funding, markets or long-term support.

Members may wish to stress that measures must reflect farm-level realities and avoid creating unintended consequences.

**22d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight that measures should be voluntary, realistic and properly resourced, and should not assume that farms can absorb new requirements without financial or operational impact.

**ACCESS & ENGAGEMENT – RECREATION (AE2)**

**23a. To what extent do you agree with the Access and Engagement AE2 Recreation Outcome, in general? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question asks whether recreational access is being promoted in a balanced and responsible way.

**What members may want to consider:** The MA is concerned that recreation outcomes may prioritise increased use without equal emphasis on land management, safety, biosecurity and wildfire risk. Members may wish to stress that access must be compatible with a working landscape and properly managed.

**23b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that recreation brings impacts, responsibilities and costs. Outcomes should clearly recognise the role of land managers in managing access and the need for controls where necessary.

**23c. To what extent do you agree with the Access and Engagement AE2 Recreation Measures, in general? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question considers whether the detailed measures for recreation are workable in practice.

**What members may want to consider:** The MA is concerned that measures may encourage increased access or infrastructure without sufficient clarity on who will manage, maintain and fund this in the long term.

**23d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight concerns about long-term liability, maintenance and enforcement, particularly where access pressures increase without additional resources.

**EDUCATION, AWARENESS & ENGAGEMENT (AE3)**

**24a. To what extent do you agree with the Education and Awareness Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks how the Plan proposes to improve understanding of the landscape and its management.

**What members may want to consider:** The MA supports education but is concerned that messaging could become one-sided or overlook the role of active land management. Members may wish to stress the importance of balanced narratives that reflect how the landscape is actually managed.

**24b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that effective education should involve land managers directly and reflect the realities of managing a working landscape, rather than idealised or simplified messages.

**24c. To what extent do you agree with the Education and Awareness Measures, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question considers whether the proposed measures are appropriate and proportionate.

**What members may want to consider:** The MA is concerned that measures could promote engagement without adequately recognising the time, access and resource implications for land managers.

**24d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to stress that education measures should be developed collaboratively, respect operational constraints and avoid placing additional burdens on those managing the land.

**25a. To what extent do you agree that the Plan provides a clear framework for partnership working? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question asks whether the Plan clearly explains how different organisations, authorities and stakeholders will work together to deliver its objectives.

**What members may want to consider:** The Moorland Association is concerned that the Plan sets out ambitions for partnership working without clearly defining roles, responsibilities or decision-making processes. Members may wish to emphasise that land managers risk being caught between different public bodies with overlapping or conflicting expectations unless coordination is clearly set out.

**25b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that effective partnership working requires clarity on who leads, who decides and how disagreements are resolved. Without this, collaboration risks becoming inconsistent or burdensome for those managing land on the ground.

**25c. To what extent do you agree that the delivery mechanisms set out in the Plan are realistic and achievable? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question tests whether the Plan's proposed delivery mechanisms are credible in practice.

**What members may want to consider:** The MA is concerned that the Plan does not sufficiently explain how actions will be funded, resourced or sustained over time. Members may wish to stress that delivery mechanisms must reflect real-world constraints on labour, skills and finance in upland areas.

**25d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight that many measures imply long-term commitments or liabilities but are not matched with clear funding streams, governance arrangements or exit strategies once project funding ends.

## **MONITORING, REVIEW & ADAPTIVE MANAGEMENT**

**26a. To what extent do you agree with the proposed approach to monitoring and review? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the Plan has appropriate mechanisms to track progress and adapt over time.

**What members may want to consider:** The MA supports monitoring in principle but is concerned that monitoring requirements could become burdensome or be used to justify new restrictions. Members may wish to emphasise that monitoring should be proportionate, transparent and focused on outcomes rather than compliance for its own sake.

**26b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that monitoring should inform learning and improvement, not act as a backdoor regulatory tool. It should recognise existing data sources and avoid duplicating reporting burdens for land managers.

**26c. To what extent do you agree with the proposed indicators and reporting mechanisms? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question considers whether indicators and reporting proposals are appropriate and meaningful.

**What members may want to consider:** The MA is concerned that indicators may focus on easily measurable outputs rather than genuine outcomes, or fail to reflect the complexity of upland land management. Members may wish to stress the need for indicators that are realistic and context-sensitive.

**26d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight that indicators should be developed with input from land managers and should not incentivise perverse outcomes or management withdrawal.

## CLIMATE CHANGE – MITIGATION

**27a. To what extent do you agree with the Climate Change Mitigation Outcome, in general? (optional)**

**MA suggested response:** ☒ Neither agree nor disagree

**What this question is really about:** This question asks whether the Plan's approach to climate mitigation is balanced and appropriate for the uplands.

**What members may want to consider:** The MA supports climate mitigation but is concerned that mitigation could be interpreted as prioritising land-use change or reduced management without sufficient evidence or consideration of trade-offs. Members may wish to stress that active land management already delivers climate benefits and must remain viable.

**27b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that mitigation measures should complement existing land management and avoid increasing wildfire risk, reducing food production or undermining rural businesses.

**27c. To what extent do you agree with the Climate Change Mitigation Measures, in general? (optional)**

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question tests whether the detailed mitigation measures are practical and deliverable.

**What members may want to consider:** The MA is concerned that some measures imply significant change or new responsibilities without clear funding, safeguards or evidence of effectiveness at landscape scale.

**27d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to emphasise that climate mitigation measures must be evidence-led, properly resourced and aligned with wildfire management, access needs and long-term land management capacity, rather than imposed as blanket solutions.

## CLIMATE CHANGE – ADAPTATION

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

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question asks whether the Plan adequately addresses how the North Pennines should prepare for and respond to the impacts of climate change.

**What members may want to consider:** The Moorland Association is concerned that the Outcome focuses heavily on flood risk and hydrological change while giving insufficient weight to other major and growing climate risks in the uplands, particularly wildfire, drought and extreme heat. Members may wish to emphasise that adaptation must reflect the full range of climate threats affecting land management, communities and public safety.

**28b. Why do you feel this way? (optional)**

MA suggested response: Members may wish to explain that climate adaptation in the uplands must explicitly address wildfire prevention, fuel management, emergency access and operational capacity alongside water and flood issues. The MA is concerned that failing to do so risks creating new vulnerabilities rather than increasing resilience.

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

**MA suggested response:** ☒ Disagree

**What this question is really about:** This question tests whether the detailed adaptation measures proposed in the Plan are realistic and deliverable in practice.

**What members may want to consider:** The MA is concerned that many measures imply significant new responsibilities for land managers, such as re-wetting, tree planting or new infrastructure, without clearly setting out who will deliver, fund, maintain or review these interventions over time.

**28d. Why do you feel this way? (optional)**

MA suggested response: Members may wish to highlight that adaptation measures must be properly resourced, evidence-led and subject to monitoring and review. The MA is concerned about unintended consequences if measures are implemented without clear accountability, long-term funding or the ability to adjust approaches where risks such as wildfire increase rather than decrease.

**FINAL COMMENTS**

**29. Do you have any other comments? (optional)**

MA suggested response: Members may wish to recognise the positive intent behind the draft Management Plan and its emphasis on collaboration. However, you are concerned that the Plan currently lacks sufficient clarity on delivery, governance, funding and long-term responsibility. Without these safeguards, there is a risk that the Plan could create uncertainty for land managers or be used beyond its intended non-statutory role. Members may wish to emphasise that the Plan should remain a guidance and partnership document, applied in a lawful, proportionate and evidence-based way. It should actively support those who manage the landscape rather than undermining them.