GWCT response to North Pennines National Landscape Management Plan consultation – 10th February 2026.

Note: Responses were via an online form. Below is the submission made by question (not all were answered).

The Vision

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

Agree

5. Why do you feel this way?

Viewing the current management of the N Pennines as a custodial role is vital and we welcome the reference to local communities and land managers/farmers. But this custodial approach means that it is important to respect that the N Pennines is a living, working landscape and that nature, structural and cultural aspects reflect this historic and current situation. We are therefore concerned that some ambitions in the plan could undermine the activities of the land managers and farmers that deliver the landscape that is valued by residents and visitors alike. Some 80% of the North Pennines National Landscape (NPNL) is, in addition to farming and access, managed for grouse shooting yet many of the proposals do not recognise the contribution of grouse moor management to the culture, history, biodiversity and economy of the North Pennines nor seek their support and engagement. In addition, climate change is not just about resilience it is also about adaptation and accepting that climatic windows may mean nature treasured by this generation is difficult to retain and 'historic' natural processes difficult to replicate.

Core Principles

6. To what extent do you agree with the Core Principles for the plan, taken as a whole? (optional)

Agree

7. Why do you feel this way, and are there specific Core Principles you want to highlight?

The ambition presented by these core principles is welcomed, especially 1 which recognises that land managers/farmers are the basis of much of the plan. But there will be trade-offs requiring difficult decisions e.g. curlew conservation and tree cover, cessation of rotational burning and cutting on peat and wildfire risk. Principle 2 (getting results through ambition and flexibility) should acknowledge that wildfire, in a changing climatic scenario, is a risk that will need consideration. This principle should also be the leading driver, although we do not generally feel that protection is the best basis for conservation, evidence-led actions are e.g. it was not the legal protection of the water vole that improved its conservation status; it was control of its main predator, the American mink, alongside habitat provision. Following IUCN Guidelines for Human-Wildlife Conflict and Co-existence should be followed to meet the ambitions of Principle 3 & 4. Principle 5 must be informed by available evidence for climate envelope scenarios and their future effect on the target habitat. Resilience now may not be resilience post 2040. Also, to what extent will these core principles guide practice? We would be concerned if the NPNL Partnership chose to apply practices that go above and beyond their statutory duty without appropriate consultation or scientific or experiential evidence. We will refer to individual examples in response to later questions.

Outcomes and Measures

9a. To what extent do you agree with the Landscape Character Outcome, in general?

Neither agree nor disagree

9b. Why do you feel this way?

We welcome the statement that the N Pennines landscape is the product of thousands of years of interaction between people and nature but are concerned that the outcome focus on conserving (and enhancing) the quality and character of the landscape means that this will 'stop the clock' and limit the on-going 'active', adaptive interaction of people, nature and landscape. Just taking the landscape at a point in time and not recognising that is a living entity that is naturally evolving and changing over time is a risk to unintended consequences.

9c. To what extent do you agree with the Landscape Character Measures, in general?

Agree

9d. Why do you feel this way? (optional)

We broadly agree with the consideration of measures that respect and maintain the historic heritage, and which reflect the working nature of the landscape. However, in respect to the point we made under the Outcome above about the landscape being a living entity, these measures need to be seen as guidance rather than prescriptive and involve collaboration with land managers/farmers rather than imposing restrictions. We will comment on Outcomes NR1, NR3 and NR4 which address aspects of the landscape character relating to Moorland and the upland fringe in particular.

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

Agree

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

Whilst a welcome ambition we do not feel this is an outcome that can be achieved given the measures proposed. They are based on generic policy direction without due regard to the specific nature of N Pennine peatlands and their associated biodiversity nor developing understanding of the impact of changing climate on ombrotrophic peatland function and therefore vegetation assemblage and the increasing wildfire risk. NR1 needs to be forward thinking beyond hydrological restoration on deep peat to pre-empt climatic envelopes predicted beyond 2061. Sphagnum moss is predicted to not survive 2061-80 temperatures/droughts. NR1h causes tension with NR1g as cutting and managed burning are key vegetation management tools for wildfire mitigation action to protect the peatland assets. See 11d.

11c. To what extent do you agree with the Nature Recovery NR1 Peatland and Heathland Measures, in general?

Disagree

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

We don't consider that some of these measures support the outcome to restore peatland and expand heathland extent and diversity. This is mainly due to the continuation of the 'accepted

truths' that 80% of peatlands are degraded (and some heathland degraded peatland), can be restored and that reduced interventions (grazing, cutting and managed burning) will deliver for nature and climate. Peatlands are a dynamic ecosystem responding to both allogenic and autogenic influences such as climate change and hydrological processes. Climate change will, as acknowledged in the draft plan, result in a higher mean winter and summer temperatures (leading to greater levels of vegetative growth and evapotranspiration causing consequent water table drawdown if not managed), less certain rainfall and more extreme events (both rainfall and drought risking erosion events, wildfires and drier habitats). In ombrotrophic complexes the waterlogged nature of the peat requires a positive balance between rainfall inputs and losses by evapotranspiration through the year. Consequently, changes in patterns of rainfall (both annual precipitation and rain days per year) and mean temperature will impact on these key controls. In addition, the measure NR1g to end managed burning and cutting of heather will merely compound the challenge by increasing evapotranspiration rates and lowering water tables during critical summer months in particular (the draft plan states that blanket bog biodiversity relies on keeping the water table within 10cms of the surface for most of the year). We have purposely used the term managed burning rather than rotational as the latter is a policy term that is ill-defined and inaccurate. Yes vegetation is managed to create a mosaic of different aged heather but rotational guidance species defined intervals which may not apply. The vegetation is managed in accordance with need and outcome – and so could also be called prescribed burning. It is also arguably a simplification to say that burning results in a simplified plant community. There is no evidence that has been able to distinguish between the effects of drainage and prescribed burning, given that both managements co-exist. Given that research has shown that on drier sites heather growth may be at the expense of other species, then the implication is that the lowered water table will have a more significant impact on surface vegetation composition. In addition, this statement is based on a broader review which includes strong evidence that *Calluna* tends to decline during the initial post-burning phase – an obvious conclusion surely if it is being removed – before increasing especially on drier sites (source NEER155). The review goes on to state it may take 15-20 years to regain dominance on wetter blanket bog. This supports two observations – firstly that burning management differs according to site (hence the desire not to use the term rotational burning) and that arguably its management on blanket bog is needed (now restricted by regulation) to reduce its canopy cover and the crowding out of Sphagnum mosses (WHITEHEAD2018 - Game and Wildlife Conservation Trust). Milligan et al 2018 (Land Degradation & Development | Environmental & Soil Science Journal | Wiley Online Journal) demonstrated that over long timescales (60 years) a no-burn policy will lead to the dominance of heather increasing summer wildfire risk. More regular disturbance through managed burning resulted in greater species abundance including Sphagnum spp. An outcome supported by more recent research in 2021 (WHITEHEAD2021 - Game and Wildlife Conservation Trust). In addition, an NR1 outcome is to make heathland mosaics more structurally diverse which is surely compromised by the desire to restrict vegetation management.

We would be concerned that NR1d would increase wildfire risk through adding fuel load at the peat edge through scrub development, given that climate change has accelerated climate-led wildfire risk particularly in areas of high recreational activity (BBQs, dropped glass bottles, wild camping etc) since the paper referenced here was written (2010). The trade-off is to assess the amount of additional carbon/nature that these scrub edges would hold against the risk of total loss from a severe wildfire of habitat (its carbon and associated biodiversity), slower moving

species, nests/eggs (if in Spring) and sub-surface carbon during the wildfire and as a legacy of the bare peat.

The key is to find a balance between ambitions for protecting the remaining carbon store in the N Pennines from climate change risk (flooding and wildfires in particular), conserving wildlife, conserving landscape appearance and economic activities such as game management, and not to limit an activity in pursuit of just one ambition. This begs the question how the NPNL is planning on achieving measure NR1h (wildfire risk) if it is limiting two (three if you include reduced grazing) of the mitigation measures available. We cannot 'control' climate change, but we can manage the fuel load.

Supporting activities such as NR1b Sphagnum reintroduction needs to be done in a targeted manner as recent research has highlighted the likelihood of increased desiccation events due to climate change.

NR1m National Government incentives will most likely be required to affect land-use change in the removal of commercial trees.

NR1s The reference for zero tolerance to new tracks is contrary to the cited evidence (ref28) which just referenced stone tracks. The AONB guidance from 2018 included work done on novel track technology (see http://www.northpennines.org.uk/our work/peatland-programme/research/tracks-on blanket-peat-experiment/). The trial concluded that temporary mesh/wooden structures had minimal effect on the physical and hydrological properties of the peatland on which they were constructed, within the timescale of the trial. Hydrological properties remained intact even with increased driving frequency and loading of vehicles. Consequently, there are solutions available which are proven to be viable options for crossing deep peat in a variety of vehicles used in moorland management.

NR1t promotes the reduced use of medication for red grouse. The reasoning behind this seems simply to be "artificially high populations of red grouse" (alongside predator control – see 12c). Worm treatments such as medicated grit are already applied in response to need through gut sample monitoring. The other use of medication is in relation to tick control. Given the increase in tick numbers, tick borne disease (recently tested in 2025) and the risk to the public from recreational pursuits in the countryside, we would suggest that the NPNL Partnership should be considering how they could mitigate these risks through a variety of measures including vegetation management and sheep treatments, the latter being reduced by farmers given the costs involved. Should this measure be promoted it would undermine the economics of a driven grouse moor resulting in job losses with the accompanying reduced management impacting on the myriad of species that are supported by this land use model including several Champion species (curlew, lapwing, black grouse). This seems counter-productive given the stated outcomes.

Our comments on predator control (NR1u) are addressed under NR2.

We have real concerns about NR1w given that these proposals would be far more restrictive than current Defra or Natural England policy based on the HRA process with expert guidance. Whilst Box 4 is not entirely unreasonable, there are some statements in there that are incorrect and it fails to balance the negatives with details of the benefits of release game management. For example, it incorrectly interprets current knowledge described in the reviews of 2020 and 2021 in relation to potential effects on invertebrates in and around woodlands. For example, that the impact was greatest during the initial introduction to the pen, that there was no chronic

between-year effects, the effects were not ubiquitous varying by taxonomic group and that the size of the effect was small compared to climatic or environmental effects. We also refer you to a 2025 paper by Sage et al on landscape densities of release gamebirds Full article: Seasonal densities of released Common Pheasants Phasianus colchicus and Red-legged Partridges Alectoris rufa on land used for shooting and on nearby non-release land in southern England. A new and approved report to be published by NE in March 2026 concludes that the affects of gamebird release on invertebrates is mainly at or very close to release sites, or at other places where birds congregate such as feed points.

Box 4 also asserts that reptiles and adders in particular can be negatively impacted and we agree this is a potential conflict that requires further observation and investigation. As it stands, the Graitson & Tayman 2022 paper is a very low-quality flawed study (we can supply a critique if of interest) and this plus anecdotal reports should not be relied upon to make management decisions. There is an on-going PhD study and other work which will improve understanding of this interaction. All this work will report in the first part of 2027.

More generally DEFRA and NE have commissioned a variety of studies over the last five years on potential effects of releasing on habitats and wildlife. These studies and others are currently being written up, and it would seem sensible to wait to see the outcome of this and its affect on gamebird release licencing arrangements in England before taking local decisions that are damaging to social and economic considerations around releasing for shooting for no particular benefit. Most of this material will be published during 2026.

The benefits of game bird releasing go beyond the impacts of release into the pen with the associated management of woodlands (rides, open spaces, woodland design, woodland edge etc which can benefit butterflies for example) and the provision of game bird crops/margins which support other farmland birds and songbirds as well as insects. Whilst Box 4 makes the point about increasing carrion crows and rats, associated predator management and best practice such as moving feeders to minimise parasite build up and deter rats will mitigate these impacts. We refer you to the detailed GWCT report on the benefits of game bird releasing management for more information and advice.

Consequently, we find there is no justification for the NPNL Partnership plans to impose a blanket restriction on gamebird releasing within a 500m exclusion zone around the sensitive sites listed in Box 4. This requirement will be highly damaging to social and economic considerations around releasing for shooting. It goes far beyond the current licencing arrangement in England whereby releasing requires a licence in a 500m zone around designated sites. There is for example no evidence that sensitive soils, floras and invertebrates are affected beyond places at or very close to where they are released or in other places where they are allowed to congregate. The focus in the NPNL should be to ensure current licencing arrangements in England which refer to GWCT sustainable releasing guidelines. Note that these guidelines include the requirement to avoid potentially sensitive situations such a reptile colony so these potential conflicts away from designated sites can be addressed on a site by site basis. Note also Ancient Semi Natural Woodland is not by definition sensitive. It is better in our view to not make a special case of the NPNL and to properly implement current and future national licencing arrangements. This would ensure the benefits of game bird release management practice are retained and the impacts mitigated and ensure that the wider benefits to conservation work and the local economy of game bird management are retained.

12a. To what extent do you agree with the Nature Recovery NR2 Wading Birds Outcome, in general?

Agree

12b. Why do you feel this way?

As the draft plan acknowledges the N Pennines holds internationally important numbers of wading birds and was designated an SPA in respect of some of these species. Their existence at viable population levels, that could be acting as feeder populations to increase their extent and abundance into undesignated areas, reflects the management of the landscape for the last few decades. The measures associated with NR2 should not undermine this successful approach.

12c. To what extent do you agree with the Nature Recovery NR2 Wading Birds Measures, in general?

Disagree

12d. Why do you feel this way? (optional)

As for NR1 we do not feel that some of the measures proposed will support this outcome. It is acknowledged that scrub encroachment and tree/shrub planting could conflict with wader conservation. Such trade-offs would therefore be further compromised if predator management were limited. Consequently, we are particularly concerned by the statement that "Wherever possible, conservation objectives should be delivered without resorting to the killing of predators" citing good habitat management or non-lethal means. We remain concerned that the effective provision of habitat for ground nesting waders without the accompanying need for protection from predation has the potential to create a population sink. Creating good habitat through management will help attract in species as they will respond to the fact that this will provide them with many of their lifecycle needs. Arguably if one then fails to protect these species from a scientifically proven risk it is morally and ethically wrong. Non-lethal methods such as fencing are ineffective at protecting nesting species from all predation risks and are not possible in all locations - Curlew nest protection: what works and what doesn't work? A view from the New Forest - Game and Wildlife Conservation Trust. If predation management is to be undertaken, whether in support of wild game or species of conservation concern, it must be done well, in accordance with the law and best practice by properly qualified and trained operators, as one life is being taken to protect another. Douglas et al (https://doi.org/10.1016/j.jnc.2023.126353) and Baines et al (BAINES2023A - Game and Wildlife Conservation Trust) are two papers that demonstrate the importance of undertaking predator management in the most effective way possible. The Douglas et al paper on breeding waders' response to habitat and predator management concluded that the model of delivery adopted in the study was highly unlikely to be effective for curlew; yet their management of predators only involved limited fox control through rifle shooting and the deployment of Larsen traps for the control of crows. In contrast, the Baines et al paper showed the great value to curlew conservation of predation management as undertaken on grouse moors which involves the full suite of legal predator management methods undertaken during the breeding season.

We do however concur that predator management should be targeted and its effectiveness monitored.

NR2d needs to acknowledge the individual needs of the species such as black grouse that will also occupy similar habitats yet require tall rushes to provide protection from predators - WARREN2012 - Game and Wildlife Conservation Trust

NR2g is another trade-off that national and local nature recovery ambitions face. The health and wellbeing benefits of being in the countryside mean that there is a policy focus on increasing public access to nature. But this has, as this measure acknowledges, to be balanced with nature conservation objectives where access levels could lead to disturbance during the breeding season (nest abandonment) and compromise nature recovery ambitions. There is a paucity of research in this area and the initial monitoring of the outcome of the CROW Act in 2006 has not been continued despite a conclusion that impacts may take several years to take effect particularly if breeding success is reduced and levels of access increase above the years monitored.

13a. To what extent do you agree with the Nature Recovery NR3 Trees and Scrub Outcome, in general?

Neither agree nor disagree

13b. Why do you feel this way?

Given the work on black grouse undertaken by the GWCT, we recognise the value that pockets of woodland can have near leks. We support the acknowledgement that this outcome will require trade-offs with NR2.

13c. To what extent do you agree with the Nature Recovery NR3 Trees and Scrub Measures, in general?

Neither agree nor disagree

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

As for NR1 and NR2 there are some measures we support and some we are concerned will result in unintended consequences. As a general point and in relation to NR3j, whilst the mapping exercise considers a number of constraints, there is no acknowledgement as to the increased risk of a severe wildfire that might result through the additional fuel load in the landscape. The location of any new woodland must therefore take this risk into account and be designed with an active mitigation plan to address the potential impact of wildfire on neighbouring habitats such as peat and heathland.

Measure NR3a acknowledges the need to manage grey squirrels, yet the broader ambition of the outcome is to support the return of pine marten. Whilst the accidental trapping of recolonising pine martens is acknowledged under NR3r, the measure needs to recognise that the legal use of lethal traps to control grey squirrels could put farmers/land managers and pest controllers in a grey area legally as there is no definitive advice in this area from the Forestry Commission or Natural England. In addition, there is no certainty that the pine marten would just eat grey squirrels and could put at risk the conservation of Champion species.

As expressed under NR1, measure NR3c relating to game bird releasing is a more restrictive approach than currently employed by Defra and Natural England and does not recognise the value to nature recovery of sustainable game bird releasing and its associated management. See our comments under 11d above. Game shooting has long been an economic motivation for

tree planting and woodland management and so a collaborative approach to tree planting under NR3k and management under NR3m would benefit both land managers and the NPNL.

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

Agree

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

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

Agree

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

We generally support the ambition behind the measures but as highlighted in other answers we believe that beaver reintroductions need to follow IUCN/Defra guidelines. Given that migratory species such as the Salmon is a champion species supported by this outcome, there needs to be consideration of how impacts on upstream migration from beaver activity are to be addressed. However we welcome the desire to compensate farmers and land managers

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

Strongly agree

15b. Why do you feel this way? (optional)

We have been concerned that the value of extensively managed grasslands is being ignored in pursuit of tree planting targets. The focus on agricultural value of land has masked the biodiversity value of these areas which this outcome recognises. However, given current farm economics and market demands, the more extensive farming practices in the uplands do require an acknowledgement of the extra 'cost' involved. Perhaps the NPNL Partnership could consider how they might help in this regard (maybe as part of measure NR5r).

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

Agree

15d. Why do you feel this way? (optional)

The GWCT supports the ambition to ensure that the species rich, extensively managed pastures of the N Pennines are maintained or conserved. However we do not agree with the concept of legal protection for such sites (NR5a and NR5m) as this can result in prescriptive approaches that may not reflect the individual site/farm requirements. A more collaborative approach (as suggested by NR5b and NR5k) working with the farmer to identify appropriate management and the potential costs involved would be more constructive. NR5g is welcomed but obviously there are likely to be times when early cutting for silage is needed. In these cases, identifying Curlew and other ground nesting species nests and allowing the removal of the eggs would aid conservation efforts.

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

Agree

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

We support the general intention to create a diversity of habitats including wetlands. Our main concern would be in relation to beaver reintroduction (also relevant to NR4 and NR8). It is important that these reintroductions are in accordance with IUCN and Defra guidance and that there are measures in place to address conflicts if they arise such as compensating farmers for flooding of farmland due to beaver dams.

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

Agree

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

NR6g aims to reduce the use of agricultural herbicides such as glyphosate. Whilst this ambition is desirable this must not be at the expense of their support for more regenerative farming techniques which may improve soil quality and therefore reduce impacts on watercourses nor ability to manage bracken encroachment. Alternative forms of management for the latter in particular are not as effective and this will undermine ambitions for restoring habitats in the N Pennines where bracken encroachment is a risk.

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

Agree

17b. Why do you feel this way?

The GWCT utterly condemns wildlife crime. There is no excuse for illegal activity, and it is depressing that a few cast a shadow over the vital contribution sustainable grouse moor management makes to reversing biodiversity decline. Collaborative approaches to addressing hen harrier conservation, such as the Hen Harrier Brood Management Trial, have demonstrated considerable success (see comment under 17d).

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

Disagree

17d. Why do you feel this way?

The GWCT believes that collaborative approaches such as the Hen Harrier Brood Management Trial are important in achieving the best outcomes. The emphasis on reporting illegal activity and sightings is a concern as this can perpetuate polarised opinions rather than create an approach to coexistence. We would like to see the measures make reference to the NPNL Partnership adopting the IUCN's guidelines for human-wildlife conflict and coexistence.

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

Agree

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

We support the concept of champion species and welcome the acknowledgement that the changing climate (and landscape) may alter the species assemblage. There is a trade-off between the species that are currently visible indicators of our nature and are valued by the visiting public and the threat that climate change presents to supporting habitats/ecosystems. We do not however agree with beaver reintroductions being regarded as a Champion species and we are concerned that both golden plover and grey partridge (red listed) are absent from the list. The NPNL holds some of the most important hill-fringe grey partridge populations - Habitat use and chick diet of grey partridge living on Pennine hill farms - Game and Wildlife Conservation Trust

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

Agree

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

See answer to 18b above.

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

Agree

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

We fully support the ambition behind this outcome and associated measures to acknowledge the cultural heritage behind the NPNL that is so valued by visitors today. This includes farming and grouse moor management yet many of the proposals do not recognise their contribution to the culture, history, biodiversity and economy of the North Pennines nor seek their support and engagement.

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

Agree

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

We fully support the need to record the intangible heritage of the NPNL and hope that ambitions for oral histories and documentation of local traditions recognises the contribution of the land management sector.

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

Agree

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

As for 20b and 21b.

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

Neither agree nor disagree

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

We appreciate the broader ambition behind the access and engagement outcome but are concerned that unless done responsibly this may compromise other desired outcomes in relation to nature recovery. Resources need to be increased to help manage visitor behaviour such as signage about wildfire risks, keeping dogs on leads due to disturbance of ground nesting species, taking litter home; rangers to watch for BBQs and camp fires and use of Bylaws.

Consideration should be given to the contribution of the maintenance of access routes by land managers and farmers (AE1b).

In respect of access and engagement, the NPNL Partnerships should engage with the regional moorland group, who already provide educational signage about species across the NPNL, to encourage responsible access, education and engagement.

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

Neither agree nor disagree

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

As for 23b we appreciate the broader ambition but are concerned that not one of the measures focusses on responsibility. With rights come responsibilities and there is no measure designed to educate and inform users of their responsibilities when in the countryside. There is no reference to the countryside code for example or for the ability to close or re-route rights of way/access routes to protect ground nesting species from disturbance. Analysis of wildlife behaviour during the COVID pandemic suggests that bird avoidance behaviour changed in response to direct and indirect effects of human presence, with differences between urban and rural habitats. Given that the pandemic saw an increased use of local parks and green spaces it is perhaps not surprising that the distance birds flew when approached by a human increased in urban habitats. In addition the response of species differed and was influenced by the type of human activity and its timescale, indicating that some species are able to respond to change more quickly. There is also the anecdotal evidence from the Foot and Mouth outbreak in 2001 which suggested that ground nesting birds in particular benefitted from the countryside being ‘closed’ to visitors. We would like to see monitoring of the effects of the access and engagement measures on nature recovery outcomes.

In addition there is no reference to wildfire risk.

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

Agree

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

The cultural aspects of our nature, landscape and heritage are important and their contribution to the NPNL and its designation should be acknowledged. Those who have been involved generationally in farming and managing the moors for grouse must be included in that cultural story, not just those that visit and 'look in' currently.

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

Agree

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

We particularly support measure AE3b given the role that land management practices including game shooting and hunting have played in the creation of the landscape and the nature and cultural heritage that is valued by visitors.

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

Agree

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

As for AE1 we support the general intention but would like to see the measures in support of this outcome focussing on the responsibilities that accompany their experiences in the NPNL.

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

Agree

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

The GWCT views collaborative approaches which work from the bottom up as the most effective and efficient. Many of the outcomes and measures envisaged by this draft management plan rely on engagement with land managers and farmers and so it is vital that they feel involved in the process of formulating and delivering the management plan. At the moment many of the measures proposed are prescriptive and restrictive thereby failing to encourage their support and engagement.

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

Neither agree nor disagree

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

See answer to 27b. Why are farmers and land managers excluded from AE5a when they are the ones most often 'hosting' both rural and urban groups? Measure AE5b is welcomed but there needs to be a genuine desire to work with farmers/land managers and not just a token forum for engagement that fails to listen to their concerns. Such fora have been ongoing and already shown the need for skilled facilitators not from conservation bodies to lead (see IUCN HCCC guidelines) Also measure AE5c – why are farmers and land managers excluded when they will be the rural host for any success for this measure? There is real concern that these groups are marginalised in decision making.

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

Agree

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

We support many of the points made in the introduction to this section and in particular that upland landscapes are especially vulnerable. However as we point out in our answer to 28d, we do not feel that some of the measures fully appreciate that resilience in some situations needs to be based on adaptation to future climate scenarios rather than on restoration which places approaches to peatland management in a climate envelope that is unlikely to remain appropriate for peatland formation by 2080 (as identified by Ritson et al 2025). In addition there is little comment on the increasing threat of wildfire to carbon stores in our peatlands and the increasing likelihood of this occurring due to climate change.

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

Agree

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

We broadly agree with the measures proposed but have concerns about the trade offs with other measures in this draft plan. CA1a talks about restoring peatlands and increasing native tree cover and so we refer you to our points made under NR1 and NR3. On the basis of NR1 measures we do not believe that these will safeguard or increase the carbon stored in the NPNL peatlands as it will increase wildfire risk in particular.

29. Do you have any other comments about the Management Plan? (optional)

Whilst we acknowledge and support the intention behind the draft management plan, we are concerned that ambition is not matched by a willingness to work with land managers and farmers to deliver the desired outcomes in a cost effective and efficient manner. There is little acknowledgement of the costs involved in some of the measures proposed and how these might be mitigated or supported given that they will be undertaken by land managers.