

Independent Evidence Review of Protected Site Management on Dartmoor – clarification points from Natural England 1st November 2023

Natural England’s advice and approach re current 1 Year extensions

At the start of HLS extension discussions, we had initially suggested to two commons, Holne and Lydford, that based on evidence of SSSI condition we were advising stocking adjustments to be able to recommend to the RPA that a 5 Year extension be offered. This information was bespoke to these two commons but was shared and interpreted as Natural England seeking wholesale changes to current stocking levels across agreement land.

The political interest that followed led to the setting up of the Independent Review and RPA agreement that moorland agreement holders had the option of a 1+4-year extension approach. Natural England confirmed that for most agreements, we would not require changes to stocking levels in year 1 but would work with agreement holders to put in place improved stock management.

There are 6 of the 25 agreements where we are very concerned that future restoration of SSSI features is close to a tipping point, and we have been working hard to seek a way forward which will reduce this threat.

To recover heathland habitats our evidence points to sheep grazing pressure in the winter as the most urgent issue to tackle.

Of the 25 HLS extensions, we are confident that 18 will be recommended for extension to the RPA by 3rd November.

Of the remaining 7:

- In 2 cases we are still working through Habitats Regulations Assessments
- In 5 cases we are waiting for management proposals. In 3 of these the original agreement has not yet expired or has only recently expired. Of these 5 cases:
 - o 2 will be straightforward
 - o 2 will present difficulty in agreeing stock reductions
 - o 1 is on hold due to landowner/commoner disagreement

4-year HLS extensions

We have been clear with agreement holders that the outcomes of the Review will help shape the next phase of discussions on the 4-year extensions to existing agreements. To assist with this, we are looking for a clear direction of travel that will deliver the change needed to secure a trajectory towards favourable SSSI condition within the context of establishing a wider transition plan that secures a future for farming and the environment.

Based on our current evidence, our view on the management approach that needs to be reflected in the 4-year extensions is that while management will need to be tailored to the circumstances of each common, if favourable SSSI condition is to be recovered there would need to be a move toward the grazing recommendations set out in the HLS guidance. For those commons where SSSI condition is currently at or close to favourable moving to the HLS guidance recommendations would involve limited change in current stocking levels. However, on those commons where the restoration of SSSI condition is needed, the adoption of the HLS restoration grazing guidance followed in time by maintenance grazing

regimes will require a significant shift away from current stocking levels. There is a need to act soon to substantially reduce grazing pressure, protect remaining dwarf shrubs and maximise the chance and rate of heathland recovery.

We will begin work on these 4-year extensions once work on the 1-year extensions is completed and the findings of the Independent Review are available.

Ponies

Natural England recognise and value the important conservation grazing role ponies can make as part of the balance of grazing animals. Indeed, some agreements include a rare breed supplement specifically for their native pony herds. This supplement is available only for Dartmoor ponies but as the semi-wild Dartmoor Hill Pony has now been included on the Rare Breed Survival Trust Watch List, we await advice from Defra as to whether it would be available for Hill Ponies in future.

There are over 1000 ponies allocated in grazing calendars on agri-environment commons and we have not advised a reduction in this number. The key in devising grazing regimes that deliver improved SSSI condition is the right balance between pony, cattle and sheep numbers. We continue to emphasise the important role ponies play in the balance of grazing animals on the commons, but it is for the graziers to decide on the numbers of ponies they wish to graze as part of the overall balance of grazing animals. Our advice includes encouraging agreement holders to have at least 50% of the target LUs comprising of ponies and/or cattle during the period May to October and consider the option to have some year-round low-level pony grazing too.

The livestock unit (LU) value of ponies and cattle, set out in the HLS guidance, is the same. In grazing calendars, grazing by ponies, cattle and sheep is accounted through their LU value and the period they are grazing. We expect that ponies will graze-year-round while cattle are on the moor for only part (typically half) of the year.

Swailing and wildfires

In our response to Q35 we described the Regulations relating to burning/swailing.

On moorland SSSI burning is usually an Operation Requiring Natural England Consent. On agreement land agreement holders who wish to use swailing to manage vegetation draw up a plan with a burning programme. This plan would normally include cutting fire breaks (to reduce the risk of fire spread) or control lines (to allow access to control the fire). On SSSI land the burning is part of the agreement which forms a permission for the operation on the SSSI. On SSSI commons where no agreement is in place the landowner will require SSSI consent to undertake burning. On agreement land where there is no swailing plan, this is usually where burning is not an appropriate management option for the habitat or because of objectives for historic environment features. Burning of vegetation on deep peat (40 cm or deeper) in SAC and SPA sites now requires a licence from the Secretary of State.

The Heather and Grass Burning Best Practice Guide 7: *Burning in the uplands of south-west England*, states that 'Burns should not normally be larger than 5 ha'. We advise that care must be taken to avoid large burns to avoid drawing in stock from a wide area. Smaller burns avoid there being large areas of heathland of the same age and structure.

The need to manage extensive areas of gorse has also been flagged as an important consideration in reducing the risk and impact of uncontrolled fires as well as increasing the available area of grazing.

There is little evidence that managed burning reduces wildfire risk and sometimes managed fires escape control such that management burning can be a cause of wildfire.

It is predicted that wildfire risk will increase in coming years and there is increasing policy focus on wildfire risk management. In future it is likely that burning management plans will need to include more about wildfire risk mitigation, including reducing risk of ignition, of wildfire spread and improving habitat resilience to wildfire.

Gorse

Both European gorse *Ulex Europaeus* and western gorse *Ulex gallii* are important components of heathland vegetation.

Western gorse is a key characteristic species of the oceanic lowland heathland communities found on Dartmoor and is best considered a component of dwarf shrub heath. This heathland type is restricted to southwest England and south Wales and the Dartmoor heathlands are outstanding in their extent and diversity.

European gorse forms a taller scrub habitat and is important habitat for some bird species. Scrub is not extensive on Dartmoor moorland (around 1% of the area covered by the ESA).

We recognise that burning and cutting can be effective in diversifying the age structure of areas dominated by gorse, though fires in gorse can be intense and there is a risk that they escape control. Frequent burning of heath with western gorse can result in loss of heather and over-dominance of gorse. Generally, frequent burning combined with high stocking rates can result in loss of heathland. Livestock are attracted to recently burnt areas which can therefore be heavily grazed, and this risk needs to be managed by coordination of burning and grazing.

Lessons from Molland Moor

On Molland Moor they have experienced a rapid increase of *Molinia* over recent decades and have established a project to re-establish the dwarf shrub vegetation. There are signs that this is working through being very proactive, burning and/or cutting large areas and then cattle grazing (using fence-less collars). There appears to be an excellent partnership approach with a steering group made up of DNPA, NE, local NGOs and graziers. The collaborative approach allows trialling management and adapting, rather than relying on prescriptions and a grazing calendar. This has been supported by a Countryside Stewardship Higher Tier scheme and a recent FIPL grant. Annual monitoring is carried out both by Natural England and an independent ecologist.

There are many lessons here for Dartmoor. It appears that restoring areas dominated by *Molinia* takes time, effort and co-ordination, and is unlikely to be achieved through loose prescriptions and passive management. Regular monitoring and feedback are needed. It is also costly. The Graze the Moor project is managing to minimise these costs as they have a relatively accessible and contiguous land area, where there is easy access for cutting and fire control, which have specific funding. There is a single tenant.

The environmental conditions are different on Exmoor and more work to understand how the approach there could be applied to Dartmoor is required. But the main conclusion is that if there is to be restoration of the balance between *Molinia* and other SSSI habitats on Dartmoor then a sustained and well co-ordinated effort will be needed. There will need to be some innovation and trial and error. The key to restoration of *Molinia* dominated areas will be restoration of hydrology in blanket bog habitat. Targeted swailing and cutting could have a useful role, if they are cost effective on the larger more inaccessible Dartmoor commons but will have temporary effects unless the hydrology is restored. Ensuring innovation and experimentation are effective and deliver benefits will depend on strong partnerships, good monitoring and sound communication with land managers.

Natural England views on recovering the habitats and nature of Dartmoor

Our current guidance is based on our analysis of the best available evidence. We want to build this evidence base and look at the potential of new technologies. We expect our guidance and advice to evolve as this happens.

The main designated habitats on the Dartmoor moorlands are upland heath (characterised by dwarf shrub communities including western gorse) and vegetation communities associated with peat soils (valley mires and blanket bog on the highest parts of the moor). These habitats have been managed through grazing with ponies, cattle, and sheep plus burning. Some limited cutting and peatland restoration has also been carried out. Management has been supported through agri-environment schemes, but these have been inconsistent in delivering favourable SSSI condition. Where current SSSI condition is unfavourable this reflects:

1. The reduction and fragmentation of heathland communities due to heavy grazing pressure on dwarf shrub communities, driven by high stocking rates and particularly high levels of winter sheep grazing.
2. The modification of structure and composition of mire and bog communities, including loss of dwarf shrubs and the over dominance of *Molinia* on peatlands due to the continuing impact of past drainage, historic burning and the reduction in early summer cattle grazing alongside high levels of winter sheep grazing.

Molinia expansion is frequently cited as the overriding factor influencing current grazing impacts on SSSI condition. While the evidence around changes in the total area now dominated by *Molinia* is inconclusive, it is reasonable to assume that in-situ management factors (set out in point 2 above) have led to the over-dominance of *Molinia* on parts of the moors. External factors such as climate change and air pollution may have compounded the effects of these. *Molinia* is a natural component of western mire/bog and heathland communities, but sometimes it can become over-dominant at the expense of other species, leading to failing habitat condition.

Understanding how grazing animals utilise *Molinia* is important. *Molinia* is deciduous and has forage value in the late spring and summer before it dies back in autumn. Cattle and ponies will graze *Molinia* particularly in the early part of the year and they help break up the *Molinia* thatch that accumulates. Sheep, however, are unlikely to graze areas of dense *Molinia* even when it is palatable. They preferentially graze swards of finer leaved grasses and as grass growth slows or stops in late autumn/winter they switch to other available grazing, targeting heathland areas to graze heather and bilberry.

Under heavy grazing pressure, areas of heathland become ever more fragmented and structurally impoverished. Given the current poor condition of many dwarf shrub communities, with very little remaining heather, there is a need to act quickly to reduce

grazing pressure. A key factor in the success of heathland restoration from over-grazing is the presence of a remnant dwarf shrub community. Once dwarf shrubs have been lost from an area, successful restoration of heathland condition is likely to be much harder. Heavy winter grazing pressure by sheep has the most significant impact on heathland extent and structure. Restoring heathland communities cannot happen without the seasonal nature of this impact being addressed.

Recovery of areas of over-dominant *Molinia* is unlikely to be successful without significant investment in the restoration of peatland hydrology alongside adoption of appropriate grazing and other measures such as cutting.

The restoration of both heathland and blanket bog/mire habitats will require:

1. The reduction of grazing pressure:
 - a. Removal or a significant reduction in the number of overwintered sheep.
 - b. Bringing maximum permitted stocking rates in line with moorland HLS guidance.
 - c. Improved shepherding to prevent sheep over-grazing the most vulnerable areas of heathland across all commons.
2. More effective management of over-dominant areas of *Molinia* to restore more diverse vegetation communities, including wet heath on shallower soils and mire/bog vegetation on the areas of deeper peat including:
 - a. More effective grazing, including the early turning out of cattle, combined with increased stock management, such as use of molasses licks, cutting access routes for cattle and ponies and possibly use of no-fence collars to target grazing of dense *Molinia* stands.
 - b. Cutting and removal of *Molinia* thatch. This technique has been shown to be effective elsewhere though there are issues due to scale and inaccessibility on Dartmoor.
 - c. Large scale hydrological restoration.

If *Molinia* control is shown to be successful in restoring heath and mire/blanket bog communities, this would have limited benefit for livestock carrying capacity as these restored areas could only support low levels of stocking and therefore be of only marginal benefit in terms of increasing livestock capacity. Even with large scale restoration, wintering sheep could not be supported on those commons where areas of heathland are already severely impacted by heavy browsing pressure until they have been restored and any winter sheep grazing would be at lower levels than at present. The effects of sheep grazing would need to be carefully monitored.

On areas of failing SSSI condition, current stocking rates will not lead to recovery, neither will making slight adjustments to existing stocking rates. If favourable condition is to be achieved, application of the HLS guidance for stocking regimes offers the best evidence-based approach to guide grazing management and this, combined with other management interventions, will in time lead to an improvement in SSSI condition.