



## **Independent Evidence Review of Protected Site Management on Dartmoor – Submission of Natural England**

**16/10/23**

### **1. Introduction**

The Independent Review of Protected Site Management on Dartmoor (the Review) has been commissioned to examine the available evidence and, in so doing, make recommendations on the most effective management to protect and restore one of our most important areas for wildlife, whilst also contributing to other important public outcomes. Essential to this is the need to provide the right conditions and support for the land management businesses that deliver these outcomes.

This document provides Natural England's advice to the Panel and is supported by our responses to the specific questions put to Natural England by the Review Panel and complements our input to the Review provided in meetings that took place with members of the review panel on 1st and 8th September 2023.

### **2. Environmental policy context**

We are experiencing unprecedented levels of loss and degradation to our biodiversity. In the UK 41 per cent of species have decreased in abundance since 1970 while 15 per cent of species have been classified as threatened with extinction. These losses matter: England is losing the natural systems that we depend upon for reliable supplies of clean water, purifying our air, regulating our climate, and securing our food supplies. We know that one of the major causes of environmental degradation has been agricultural intensification.

Solutions to a crisis of this order will need to be bold and far reaching. In his report, *Making Space for Nature*, John Lawton<sup>1</sup> advocated the need to establish coherent and resilient ecological networks through bigger, more resilient and connected habitats, dealing with the triple challenges of biodiversity loss, climate change and wellbeing. This will require fundamental changes to the way we conduct management of large areas of our land. The greatest opportunities include the largest areas of sites protected under law as Sites of Special Scientific Interest (SSSI), such as Dartmoor.

Protected areas are recognised as critical to halting, and ultimately reversing, the loss of biodiversity. This is why the UK government, along with most other countries has committed to protecting 30% of our land and seas for nature by 2030 (the '30x30 target'). Government has recognised that SSSIs "are hugely important for ensuring species have strongholds from which they can expand, through a farmed landscape that is more welcoming for them."<sup>2</sup> Government's Environmental Improvement Plan 2023 commits to restoring 75% of protected sites into favourable condition by 2042, with "farming and land management to contribute to at least 50% of this goal"<sup>3</sup>. In addition in commissioning the Glover Review, to which

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<sup>1</sup> ['Making space for nature': a review of England's wildlife sites published today - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/making-space-for-nature-a-review-of-england-s-wildlife-sites-published-today)

<sup>2</sup> [What the Environmental Improvement Plan means for you - Farming \(blog.gov.uk\)](https://www.blog.gov.uk/2023/02/28/what-the-environmental-improvement-plan-means-for-you-farming/)

<sup>3</sup> [What the Environmental Improvement Plan means for you - Farming \(blog.gov.uk\)](https://www.blog.gov.uk/2023/02/28/what-the-environmental-improvement-plan-means-for-you-farming/)

Government's response is expected soon, Government have recognised the need for our protected landscapes such as Dartmoor to make a bigger contribution to nature recovery and net zero, including taking action to ensure SSSIs are in favourable condition and that management is in place at a strategic scale to sustain them.

### **3. Agricultural Transition**

English Farming is going through significant change. The government has introduced a policy to transition agriculture away from an industry that receives direct subsidies for farming, to an industry that is rewarded by payments for public goods. This means that some farms, particularly those which have traditionally had a high proportion of their income from subsidies, will need to adapt their business models to remain viable. High cost / high input systems that have low value outputs are more likely to become unprofitable over time.

This does not mean that land management businesses will become unviable. In fact, the reverse is true: farmers and their ability to actively manage land in ways that benefit the environment will be essential to the delivery of the outcomes that the government has prioritised. There are opportunities for people who farm in more marginal areas to develop and maintain profitable businesses by moving to low cost / extensive systems that have high environmental outputs. The new Environmental Land Management (ELM) schemes, and a range of private finance initiatives, are being developed to support and reward land managers to do this.

Many of these schemes are still in development. Key components of the new schemes will be the development of differentiated payments that pay more to land managers who are undertaking more ambitious actions, including rewards for keeping SSSIs in favourable condition on behalf of the nation. In the longer-term rewarding land managers who deliver environmental outcomes through "payment-by-results" is being considered.

Also, the Landscape Recovery Scheme is specifically designed for farmers and land managers who want to take an ambitious large-scale, long-term approach to producing environmental and climate goods and services on their land. A project in East Dartmoor was awarded a development grant in the first round of this scheme in 2022. Natural England continues to encourage further applications and two have been made that include Dartmoor commons in a second round that are presently being evaluated.

### **4. Nature on Dartmoor, including SSSIs**

Dartmoor's mosaic of upland habitats is nationally and internationally important but are suffering habitat loss and degradation. There have been significant reductions in key species such as heather and bilberry in recent years; in some places we have seen reductions from 25% heather cover to 1%. As a result many of the extensive SSSIs have remained in unfavourable condition.

SSSI favourable condition cannot be achieved independently of good ecosystem function, and it is increasingly understood that there needs to be a natural processes approach to managing SSSI, with, for example, naturally functioning hydrological systems and sustainable grazing regimes. SSSI favourable condition can be an indicator of whether a habitat is likely to be providing other public benefits alongside biodiversity.

Opinions vary on what influences have caused this decline. It is the view of natural England, based on our evidence and observations that changes to grazing patterns – including the balance between winter and summer grazing- and intensities- such as the relative numbers/timing of sheep and cattle and ponies on the moor- are a major factor in this decline.

Dartmoor is valued as a distinct cultural landscape and its habitats have been shaped by centuries of management. Dartmoor's moorlands are a microcosm of what is happening

nationally, and in many other countries, where the urgent societal need to recover nature requires action through modernisation of land management practices.

Appropriate pastoral management is required to look after the special features of Dartmoor. Sustainable grazing regimes include the right numbers and type of grazing animals at the right time, supported by shepherding and sensitive management of stock feeding. Careful burning, maintenance of hydrology and peatland restoration can support sustainable grazing regimes. Without this management species like *Molinia* can dominate, constraining dwarf shrub vegetation leading to large areas of little value to farmers or wildlife. Functioning peatlands can contribute to a range of ecosystem services (for water, carbon storage and sequestration and biodiversity) and mitigate wildfire risk.

We are aware of the suggestion that external factors, such as climate change, air pollution and the impact of heather beetle have been significant causes of declining condition on the moorland SSSIs on Dartmoor. While we agree these factors have played a role, we consider that impacts of management are more important. The disruption of hydrological function in areas of blanket bog and valley mires combined with a reduction in early summer cattle grazing pressure has, we believe, favoured the expansion of *Molinia*. Similarly, the loss and fragmentation of dry heathland is primarily a result of changing patterns of seasonal grazing, shepherding and choice of stock breeds.

#### **5. Natural England's work with land managers on Dartmoor**

Natural England (and its predecessor bodies) has had a long history of working with land managers to support the rare and threatened habitats of Dartmoor, the wildlife that depends upon them, and sustainable farming businesses and the communities that rely on this.

We do not think that farming and nature need to be in conflict. We recognise and celebrate the efforts of so many of the land managers we work with to support the natural environment, and who continue to adapt their businesses and their land management practices to deliver more for nature.

We understand that farmers need a regular flow of information about the outcomes sought and practical support to ensure they are able to deliver environmental outcomes. Advice is available from Natural England, other statutory bodies such as Dartmoor National Park Authority, e NGOs who also have experience as land managers and the private sector. It is essential that farmers get access to trusted, objective and evidence-based advice to get the most out of public investment in farm businesses.

Natural England and our predecessors have worked hard with land managers on Dartmoor but it has been difficult to achieve consensus necessary with the numbers of people who have rights and interests across the Dartmoor commons to deliver environmental outcomes. In some areas, this has been successful, but for the most part it has failed, despite very significant public investment.

An initiative to engage and empower agreement holders in more effective management in the Forest of Dartmoor HLS agreement in 2013, through training and guidance, failed to deliver results despite a promising start.

Factors that have contributed to failure of agreements to deliver their intended outcomes include:

- Many of these areas are unfenced and targeted changes in grazing regimes are difficult to maintain.
- With management dependent on co-operation between a number of commoners, without appropriate governance, compliance with agreement requirements can rapidly break down.
- The loss of trust and respect between NE and some commoners which impacts our capacity to provide advice and support

- There is significant disagreement around the evidence base leading to misinterpretation and confusion on what management is needed and why.
- The risk of a small number of voices dominating public debates. and stifling positive innovation

Natural England is keen to work in partnership to develop and implement much more ambitious and innovative approaches to restore the health of the natural environment of Dartmoor in ways which also ensure viable farm businesses in a new era of public funding. There needs to be an evolution of land management business models to enable lower input lower output systems to be profitable, including financing of the transition.

We would like the Review to help all parties by finding constructive ways to explore, decide on and implement the changes necessary for a positive future for farmers, farming and the environment of Dartmoor and to make clear recommendations to Government on the support system to enable what, for many, will be transformative change, for the benefit of wider society and in line with Government's statutory goals for nature and for climate.

On Dartmoor investment is needed in building a very strong partnership, supported by governance that enables innovation, where evidence is understood and accepted and where public outcomes are fully rewarded.