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Independent report

Independent review of protected site management on Dartmoor

Updated 13 December 2023

Applies to England

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Chairman's foreword

When I accepted the invitation to carry out this review, I knew that it would not be easy to come up with solutions to the problems set out in our terms of reference. Many of the challenges that Dartmoor faces are deep rooted and hard to resolve. However, the climate emergency and the alarming decline in biodiversity set out in the recent State of Nature report means that we can't afford to wait any longer. The way Dartmoor is managed needs to change radically and urgently to address these issues.

We believe that commoning and pastoralism have an important part to play in solving the problems that we face. Dartmoor needs to be grazed. At the same time, Hill farmers are facing some of the largest changes in support that they have seen in a generation and are fearful for their futures. Much of our review has therefore been devoted to considering how we can best equip them to meet the challenges that lie ahead. We need to create a framework to achieve the wide range of public benefits that Dartmoor is capable of providing in the twenty first century.

A key issue was to look at the governance of Dartmoor and encourage people to come together to produce a shared vision for the future and how to get there. Clearly this process involves commoners, Defra and Natural England, but also a wide range of other stakeholders with a vested interest in the future of Dartmoor: archaeologists, walkers, riders and conservationists to name but a few.

More than anything, the review has been about listening to peoples' insight and experience, mostly directly involving Dartmoor, but some interesting perspectives from elsewhere as well. Then, we challenged each other as panel members to find a way forward for this special place. The panel had a wide range of scientific and other expertise. Some had in-depth prior knowledge of Dartmoor and others less so. This balance, deliberately chosen, has proved to be invaluable. We were never going to find a silver bullet - a magic solution that has eluded others. We have tried to move the dial with a series of small changes whose cumulative impact will be helpful and make a difference. Crucially, our proposals involve people working together as equals, collectively.

We have focussed on land management and land use. We want to encourage the parties involved to start implementing our recommendations as soon as possible. In some instances, it will take some time to make the changes we are seeking, but that needs to happen as a deliberate choice rather than through inertia.

My panel have come together at very short notice and worked hard under pressure to provide great insights and challenge. They are still incredibly busy people and yet made the time to visit Dartmoor on a good number of occasions, some coming down from the North of England to do so. I am grateful to them

for their input and for the work of Simon Lunniss in providing the secretariat for our review.

Panel members

Cicely Hunt - land agent and agricultural grants specialist, and member of the Independent Agricultural Appeals Panel for the Rural Payments Agency (RPA)

Dr Lisa Norton - agro-ecologist at the UK Centre for Ecology and Hydrology, Lancaster Environment Centre

Jeremy Moody - Secretary of the Central Association of Agricultural Valuers (CAAV)

Professor Charles Tyler - Professor of Environmental Biology at the University of Exeter

Professor Jane K Hill - Professor of Ecology at the University of York

Professor Matt Lobley - Professor of Rural Resource Management and Director of the Centre for Rural Policy Research at the University of Exeter

Sue Everett - ecologist and land management adviser, chair of The Countryside Regeneration Trust

William Cockbain - Cumbrian hill farmer and former Chair of the National Farmers' Union (NFU) Uplands Panel

Chairman

David Fursdon

December 2023

Section 1: Report purpose and structure

1. Purpose

1.1 This is the report of the independent review of protected site management on Dartmoor, carried out under the chairmanship of David Fursdon. It makes a series of recommendations for Defra ministers to consider on the future management of Dartmoor's sites of special scientific interest (SSSIs), designated under the 1981 Wildlife and Countryside Act, and the Dartmoor Special Area of Conservation (SAC), created under the Habitats Regulations.

1.2 As these sites have so far been managed almost exclusively through Agri-Environment Scheme agreements, we have considered the operation of these schemes on Dartmoor in some depth. We have sought to balance the objective of bringing protected sites into favourable environmental condition with providing a range of other priorities such as:

- agricultural production
- public access
- carbon capture
- fire risk
- water supply
- military use (including firing ranges)
- cultural and natural heritage

1.3 The [terms of reference for the review](https://www.gov.uk/government/publications/independent-review-of-protected-site-management-on-dartmoor-terms-of-reference) (<https://www.gov.uk/government/publications/independent-review-of-protected-site-management-on-dartmoor-terms-of-reference>) are available on GOV.UK. Ministers have asked us to look closely at the negotiations going on over the extension of current Higher-Level Stewardship (HLS) agreements and to recommend how the current impasse between Natural England and Dartmoor commoners can be resolved. This is a priority for immediate action.

2. Structure

2.1 This report is broken down into a number of sections:

- Section 1: the report, its purpose and structure
- Section 2: the review, background and methodology
- Section 3: context, introduction to Dartmoor and its agriculture, protected site legislation, the role of Dartmoor statutory bodies
- Section 4: panel findings, commentary and observations
- Section 5: conclusions and recommendations
- Appendices:
 - Appendix 1: Summary of recommendations
 - Appendix 2: list of organisations and individuals submitting written evidence to the review

Section 2: The review

3. Background to the review

3.1 The Environmental Stewardship Scheme has closed to new entrants and many of the HLS agreements entered into by Dartmoor commons associations are coming to the end of their current terms. 23 such agreements are ending during 2023. Some of these agreements have already been extended at least once already, benefitting from the annual extensions permitted by the European Commission while the UK was subject to its jurisdiction.

3.2 As Environmental Land Management Schemes (ELM) are being introduced over a number of years in England, Defra ministers have decided to offer existing English HLS scheme members the opportunity to extend their agreements for up to 5 years. This will give them more time to consider future options for their businesses and to decide which routes to pursue under ELM.

3.3 To ensure value for money and comply with statutory obligations, extensions can only be offered where Natural England (NE) has confirmed that the agreements concerned are achieving their own objectives. On Dartmoor, NE concluded that the very low proportion of SSSI units in favourable condition meant it could not give those assurances and discharge its statutory responsibilities without the commons concerned agreeing to make further significant management changes and reductions in stocking rates.

3.4 While it is unclear whether and how clearly NE had already flagged its concerns over the condition of many SSSI units on Dartmoor, these changes undoubtedly came as a shock to the commoners. They responded angrily, with pre-existing tensions spilling over and their whole future participation in Agri-Environment Schemes being thrown into question. This culminated in local MPs sponsoring a Westminster Hall debate on the issue. Defra ministers asked David Fursdon to carry out this review.

3.5 To give the review time to report, the 5-year extension period was split into 2 separate periods of 1 year and 4 years (1 plus 4). For most agreements, limited or no change would be required in the first year of the extension. The recommendations from the review would inform the changes requested for the remaining 4 years. Commoners would then decide whether to continue in agreement, without affecting the payments received for the first year.

4. Methodology and evidence

4.1 This has been an evidence-led review. We have approached our task with open-minds and sought to engage with, and make ourselves available to, as many stakeholders and interested parties as possible. We have carried out numerous field visits, interviewed many individuals and organisations and received 155 written submissions. In doing this, we have been treated with unfailing good humour and courtesy and many people have gone considerably out of their way to help us. We particularly wish to record our thanks to all of the commoners we have met, to the Dartmoor National Park Authority (DPNA), the Dartmoor Commoners' Council (DCC), the Dartmoor Hill Farm Project and also to NE. This review has shone a spotlight on NE's role and activities, but its officers have been constructive and willing to answer our questions. We are grateful to them for their help.

4.2 This process has given us a lot of insight and information, but we do have to stress the lack of hard, empirical data in many areas. Sometimes this is because data was either not collected in the first place or is missing. Some of it is unreliable. So, for instance, we have been unable to determine the actual condition of SSSIs at the point at which they were designated and we have a very incomplete set of monitoring records for these sites. It has also proved impossible to establish, with any degree of certainty, the total number and breakdown of livestock grazing on the moor at any time.

4.3 In other instances, causal relationships and the impact of external environmental factors have yet to be fully understood. We do not yet know the full impact of climate changes that have already happened or are still to come. As a result of environmental pollution, Dartmoor now receives as much atmospheric nitrogen annually as some farmers use to fertilise their grass fields (between 25 and 40 kilograms per hectare (kg/ha)). This is likely to favour nitrogen responsive plants such as *Molinia* over other, less-responsive, plants. The effect of these and other factors are not yet fully quantified, but they will already be having a significant impact on what it is possible to achieve in terms of ecological management and species recovery.

4.4 The impact of pests and diseases is also hard to quantify. Heather and dwarf shrubs are attacked by the Heather Beetle and phytophthora. Dartmoor itself is an increasingly hostile environment for mammals (including in some cases humans) through a significant increase in tick-borne diseases such as Red-Water Fever and Louping Ill. Once stock have acclimatised and achieved resistance, it becomes difficult to move them off the moor without losing that environmental adaption.

4.5 In this rapidly changing environment, there is a clear risk that we may be striving to achieve historic targets for the management of protected sites that are already unattainable, while missing emerging opportunities to achieve new and stretching environmental benefits. We need to act urgently, but still be cautious in recommending irreversible responses to ecological changes that we don't yet fully understand.

Section 3: Context

5. Geography and land use

5.1 Dartmoor's exposed location on an Atlantic peninsula, reaching 2,000 feet above sea level at its highest point, means that it has a cool, wet and windy climate. It is generally milder than similar but more northerly upland areas in the rest of England and has a longer grass growing season. Its granite geology means that much of its area has thin, acidic soil.

5.2 Dartmoor's high rainfall makes its hydrology especially significant. It has internationally important peat blanket bogs, valley mires and wet heathland. Peat is formed from vegetation decaying under waterlogged conditions and hosts an abundance of plants including sphagnum mosses, cotton grasses and sundews. Peat bogs are also home to threatened birds such as the most southerly breeding dunlin in Europe and support other wildlife such as dragonflies, frogs and beetles. They are capable of storing and locking up large quantities of carbon. However, the University of Exeter estimates that just 1% of Dartmoor's deep peat area is healthy, peat-forming bog, with the majority degraded by historic peat-cutting, drainage and erosion. In this state, blanket bogs are likely to be emitting rather than storing carbon. Expensive and time-consuming work is now going on to restore and re-wet Dartmoor's peat bogs by blocking erosion gullies, drainage channels and peat cuttings.

5.3 Most of Devon's rivers rise in Dartmoor's blanket bogs and feed 6 reservoirs and around 20 abstraction points, from which South West Water captures drinking water. Dartmoor is also criss-crossed by leats (man-made watercourses) managing and diverting the flow of water over it.

5.4 The Dartmoor National Park covers an area of 95,000 hectares (ha), roughly two-thirds the size of greater London. This includes 46,000ha of moorland and, within that, approximately 36,000ha of registered common land. 86% of the National Park is defined as utilizable agricultural area.

5.5 There are 92 separate registered commons on Dartmoor, mostly bordering the central high ground of the Forest of Dartmoor, which is the largest common on the moor at 11,200ha. Most of the commons have no physical boundaries so, without shepherding, animals can stray freely between them.

5.6 Between 30 and 35 % of Dartmoor's farmers are estimated to be tenants.

5.7 There are 54 commons owners on Dartmoor. The largest of these is the Duchy of Cornwall, which has owned the Forest of Dartmoor and some adjacent commons since 1332. Other owners include private individuals and families, the Dartmoor National Park Authority, the Ministry of Defence, Natural

England, the National Trust, other non-governmental organisations, and water and mining companies.

5.8 There are about 850 registered commoners, of whom it is estimated less than 20% are active graziers.

5.9 Dartmoor has the highest concentration of prehistoric archaeological sites in the UK and a wealth of medieval and industrial (mostly tin mining) archaeology. It has 1,100 scheduled ancient monuments and has what may be the largest surviving Bronze Age landscape in Europe.

5.10 Ministry of Defence training areas cover 13,000ha on Dartmoor. Live firing takes place over 8,900ha on up to 240 days of the year. Unexploded ordnance adds significant cost to the re-wetting of peatland.

5.11 The Scarborough Tourism Economic Assessment Model (STEAM) model used by all English national parks to estimate visitor numbers suggests that Dartmoor has 2.3 million visitors per year staying for more than 4 hours. Research carried out by the University of Exeter estimated 7 million visits of 1 day or less per year from the local area, projected to increase to 8 million by 2039 due to local population growth.

6. Agricultural history

6.1 A working knowledge of Dartmoor's past helps to understand its current position and how its ecology has changed and evolved in response to humankind's interventions.

6.2 For much of its history, Dartmoor was managed through pastoralism and summer-grazing transhumance. Animals and particularly cattle were taken on to Dartmoor to graze in summer and then returned to their home holdings to over-winter.

6.3 This was a carefully administered process, with property rights being set out in manorial records and the requisite fees being paid and recorded. Some farmers acquired grazing rights on their manorial home commons. Farmers in certain parishes had the right to move animals between their home commons and the central high ground of the Forest of Dartmoor (the 'Venville men'). Farmers from other parts of Devon – notably the South Hams – also had the right to bring animals up onto the moor. Agisters (herdsmen managing cattle for a fee) employed by Dartmoor landowners charged a fee per head for allowing animals to graze on the moor and tending to them while they were there.

6.4 The number of animals that a grazier could turn out on a common was determined by the capacity of their home holding to manage that stock through the winter (known legally as 'levancy and couchancy').

6.5 From the late nineteenth century onwards, this pattern of use began to break down under economic pressure from increasing international competition. The summer grazing of stock from other parts of Devon gradually stopped. Dartmoor-based farmers and landowners also started experimenting with the introduction of hardy sheep and cattle breeds able to stay out on the moor all year, loosening the relationship between the home holding (the inbye land) and the common grazing. Levancy and couchancy was effectively replaced by 'stinting', where the assessment of the common's grazing capacity was made independently from any consideration of the graziers' home holdings.

6.6 By the mid-twentieth century, the practice of leaving animals to graze on the moor over winter had become well established. Production methods were intensified in response to the demand for increased food production during and after the Second World War.

6.7 An attempt was made in the 1960s to address the increasingly out-dated legal basis of commons grazing in England and Wales through the passage of the 1965 Commons Registration Act and the subsequent work of the commons commissioners to register rights. This process was only partially successful on Dartmoor, with some commoners not registering their rights and others registering rights multiple times that were intended to allow the same animals to be grazed on different commons at different times in the year. The overall effect of this was the creation of more grazing rights than could reasonably be accommodated on Dartmoor's commons, removing a potential constraint on stocking numbers. We have seen figures showing that, on the Forest of Dartmoor, active graziers currently turn out stock equivalent to 22% of their rights. When the rights held by non-graziers are included as well, the utilisation figure drops to 12.5%.

6.8 After the UK's accession to the then European Economic Community, the operation of the Common Agricultural Policy became a further significant destabilising factor on Dartmoor. In particular, the introduction of headage payments for sheep (first the Ewe Premium and then the Sheep Annual Premium) and then for cattle (through the Suckler Cow Premium and more latterly the Beef Special Premium) encouraged increased stocking on Dartmoor's commons. This is now recognised by both farmers and environmentalists to have resulted in significant environmental and ecological damage. In a version of the 'tragedy of the commons', graziers responded rationally to the incentives they were being offered as individuals, but the overall impact on the commons was negative, with increased swaling (burning of vegetation to stimulate the growth of palatable grass) and high year-round stocking rates being maintained through environmentally damaging practices.

6.9 From the 1980s onwards, policymakers began to counter this trend towards intensification by offering farmers the opportunity to participate in agri-environmental (A-E) schemes. The Agriculture Act 1986 provided for the designation of Environmentally Sensitive Areas (ESAs). Dartmoor was made an ESA in 1994 and most Dartmoor commons entered into ESA agreements, agreeing significant stocking reductions and the removal of over-wintered stock.

It has been reported to us that cattle and sheep numbers dropped by 50% across all commons.

6.10 The Agriculture Act 1986 also required ministers to have regard for socio-economic interests and the public enjoyment of the countryside. The requirement to balance the achievement of environmental goals with socio-economic, cultural and public enjoyment considerations has been a consistent feature of environmental legislation since that time. The Natural Environment and Rural Communities Act 2006 (the NERC Act 2006) provide that NE's general purpose includes 'contributing in other ways to social and economic well-being through management of the natural environment.' The National Park's socio-economic objectives and obligations are explained later in this report.

6.11 For most commoners, the ESA agreements were their first experience of entering into a formal collective agreement for the management of their commons. The governance required to balance the interests of commons owners, graziers and non-grazing rights holders proved challenging and has continued to do so for all A-E schemes. A number of people we have spoken to have referred to the difficulty of negotiating the distribution of the associated payments and the negative impact this had on the relationships between commoners.

6.12 In 2005, the Environmental Stewardship Regulations made under the Environment Act 1995 replaced ESAs with a new generation of EU-funded Environmental Stewardship agreements. Recognising their complexity and high environmental value, commons were directed towards Higher Level Stewardship (HLS), with Natural England Advisers providing individual support for the drawing up of 10-year agreements. These were introduced on Dartmoor with the negotiation of further significant reductions in stocking rates. It is the ending of these agreements, and the possibility of their extension with further significant stocking reductions as required by NE, which has provoked the current crisis in relations between commoners and regulator.

7. Current farming practices and economics

7.1 Farming on Dartmoor continues to be based on pastoralism and livestock production, with moorland grazing on common land and newtakes (land enclosed from the surrounding moor in the eighteenth and nineteenth centuries) being supplemented to a varying extent by the use of better pastures on home farms and inbye land.

7.2 Three species grazing of cattle, sheep and ponies remains the norm on Dartmoor. Their different grazing habitats can complement each other well. Cattle prefer to eat longer grasses and use their tongues to pull and tear the vegetation. They graze to a height of 5 to 6cm and are generally better than

sheep at attacking problem vegetation and creating and maintaining structurally diverse grassland. Sheep have thin, mobile lips and move slowly over the sward nibbling the grass. They eat selectively when circumstances allow, biting off single leaves or shoots down to a height of 3cm. As well as grasses and herbs, sheep will also selectively eat some low scrub and their grazing of heather and dwarf shrubs can be a particular issue on Dartmoor. Horses and ponies have forward-facing teeth and can graze extremely close to the ground. They will preferentially select sweet grasses but will also eat a variety of sedges and rushes, bracken, scrub and tufted grasses.

7.3 For cattle, a lot of production systems on Dartmoor are based on producing store animals or breeding livestock, but we have seen finishing of fat animals as well. There are herds of Galloways and Belted Galloways (and some highland cattle) that stay out on the moor all year round, but there are also systems based on crossing stock with larger, more commercial, breeds and housing them over-winter. Some traditional breeds such as the Devon Red are also kept on this system. Both models can supply animals for conservation grazing, but a key issue is the calving pattern. Spring calving can be more economic and now predominates, but autumn calving suckler herds are invaluable for conservation grazing. They can be turned out to graze in the ecologically crucial period of late spring and early summer when the *Molinia* is at its most palatable.

7.4 For sheep, there are flocks of Scottish Black-Faced sheep and Herdwicks or Swaledales that live on the moor all year, with any available in-bye land being used for separately managed and distinct flocks of mule ewes (cross-bred sheep) and more commercial breeds. We have also seen more integrated systems that keep flocks on moorland grazing for part of the winter but bring the sheep in for lambing and flush them on inbye grazing to bring them into good condition before tupping (breeding).

7.5 Pony keeping on Dartmoor is a highly traditional activity that generates revenue from the sale of foals. Some commoners keep non-pedigree hill ponies, while others specialise in breeding pedigree or true to type animals.

7.6 Farming on Dartmoor is economically extremely marginal. Defra publishes figures nationally for Farm Business Income in England (the amount which must provide a return for unpaid family labour and the farmer's own capital). In 2021 to 2022 Less-Favoured Area (LFA) grazing livestock farms benefitted from very high output prices (sheep prices were up by 25% on 2020 to 2021 and cattle prices by 12%), but the average direct agricultural income for these farms was still only £200 for the year. Income from agri-environmental activities was £12,300. The Basic Payments Scheme (BPS) contributed £26,500 and diversified income £3,900, giving a total average income of £42,900. For 2022 to 2023, recently published figures show a net loss of £10,400 from agricultural activities. BPS fell by just under a quarter from 2021 to 2022 to £19,700, diversified income was £3,300 and income from agri-environmental activities rose slightly to £12,900. Average total farm business income was £25,400, down 41% on 2021 to 2022.

Table 1: Net farm business income for LFA grazing livestock farms

Net Farm Business Income	2021/2022	2022/23
Agricultural net income	+£200	-£10,400
Agri-environment Payments Gross	+£12,300	+£12,900
Basic Payment	+£26,400	+£19,700
Diversified/Other	+£3,900	+£3,300
Total	+£42,900	+£25,400 (see note)

Note: Total figures do not add up due to rounding

Source: National statistics Farm Business Income by Cost Centre 2022 to 2023.

7.7 For Dartmoor specifically, we have also seen the 2021 results from a small survey carried out by the Duchy College Rural Business School, attempting to assess the year-round cost of commoning on Dartmoor. These figures (which included a cost for the farmer's own labour) showed an annual net loss of £348.90 per cow and £16.90 per ewe. Similar figures have been quoted by both commoners and NE. Mares made a small positive return of £24.70.

7.8 It would be fair to say that at present Dartmoor's farmers do not know how they are going to make up for the loss of BPS.

8. Statutory protection of environmentally valuable sites

8.1 Together with a rich variety of wildlife, birds and insects, Dartmoor has sites containing a wealth of nationally and internationally important environmental features including:

- blanket bogs
- wet and dry heaths
- valley mires
- old sessile oak woodlands

8.2 The process of notifying (registering) and protecting such sites began in the UK with the passage of the National Parks and Access to the Countryside Act

1949. This allowed sites of special scientific interest (SSSIs) to be notified to local planning authorities.

8.3 The current statutory framework for notifying SSSIs is provided by sections 28 to 28S of the Wildlife and Countryside Act 1981 (WCA), as amended by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006. The WCA also sets out the role and responsibility for what is now NE to designate and manage SSSIs.

8.4 As amended, the WCA allows for directly negotiated management agreements on SSSIs. However, NE has used agri-environment agreements instead.

8.5 When the WCA came into force, a long process was gone through to review existing SSSIs and either de-notify or re-notify them, often with boundary changes. This means that the most longstanding SSSIs have gone through a convoluted notification process.

8.6 SSSIs can be notified for their biological or geological interest – Dartmoor has both – and they may be divided into separate management units. For biological SSSIs, NE will look at an area such as Dartmoor with particular landscape and ecological characteristics and notify a representative sample of the best examples of each significant habitat, although for rarer habitats all examples may be included. It may also select sites of particular significance for various taxonomic groups (for example birds, dragonflies, butterflies, reptiles, amphibians), with each group having its own set of selection guidelines. Geological SSSIs are selected using a more restricted process, with the intention of there being at least one example of each nationally important geological feature notified across Britain.

8.7 When land is to be designated as a SSSI, NE must notify all interested parties, including central government, local planning authorities, National Parks and all 'owners and occupiers' of the land concerned. The Countryside Rights of Way Act 2000 made it explicit that commoners with grazing rights were to be included as 'occupiers', but the previous lack of clarity means that notification of commoners has been inconsistent. Many commoners on Dartmoor were not notified when SSSIs were designated on their commons. There are conflicting legal opinions as to how significant this is for the application of the WCA on common land and particularly how commoners should be treated as 'owners and occupiers' for the application of the rest of the act.

8.8 As part of the notification process, NE must specify the flora, fauna, or geological or physiographical features which make the land of special interest and the operations NE believes are likely to damage that flora or fauna on those features. This gives rise to Operations requiring Natural England Consent (ORNEC), the list of operations that can only be carried out with permission from NE. These operations can only be carried out by the 'owner or occupier' of the land in a specified range of circumstances and will usually require NE consent (granted routinely as part of entering into an A-E

agreement). There is dispute over how this requirement should be applied to commoners. Any owner or occupier failing to obtain this consent, or anyone convicted of damaging or destroying any of the features of special interest of an SSSI, may be fined up to £20,000 in a Magistrate's Court, or an unlimited amount in the Crown Court.

8.9 NE assesses the condition of SSSIs sites, or units within them, with the target of carrying out such assessments at least every 6 years, although some have now been outstanding for more than 10 years. Condition is assessed against the following categories:

- favourable - habitats and features are in a healthy state and are being conserved by appropriate management
- unfavourable (recovering condition) - if current management measures are sustained the site will recover over time. We have found this to have been the default status for SSSIs at the point when they were brought under agreement
- unfavourable (no change) or unfavourable (declining condition) - special features are not being conserved or are being lost, so without appropriate management the site will never reach a favourable or recovering condition
- part destroyed or destroyed - there has been fundamental damage, where special features have been permanently lost and favourable condition cannot be achieved

8.10 There is also a separate but overlapping structure of European designations. The Single European Act 1987 gave the EU specific competence on environmental matters. The passage of the EU Habitats Directive 1992 led to the creation of Special Areas of Conservation (SACs) as a network of environmentally important European sites. Together with the Special Protection Areas created under the Birds Directive, these are known as the European or Natura 2000 sites. The Directive is currently implemented in England through the Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

8.11 The Conservation of Habitats and Species Regulations 2017 require a Habitats Regulation Assessment (HRA) to be undertaken for any actions impacting a SAC. Broadly, when an SSSI is also situated in a SAC, any operation requiring SSSI consent as an ORNEC will also require NE to carry out a HRA. This arguably offers a higher level of protection than SSSI designation alone, as decisions are made on a precautionary principle (so NE must not grant permission for an action unless it can be shown positively not to have negative consequences).

8.12 In this sense, SSSIs are the basic building block of all site-based nature conservation legislation in the UK and most other conservation designations are based upon them, including the high value National Nature Reserves (Dartmoor has 3 of these) and Ramsar sites.

8.13 Environmental protection is a high government priority. Commitments given at the Bern and Ramsar Conventions have been made legally binding. The UK also undertook at the COP15 UN Nature Summit to protect 30% of its land and sea by 2030. Legal targets to encourage environmental improvement and increase biodiversity are contained in the Environment Act 2021. The 2023 Defra Environment Improvement Plan set the target to bring 75% of English protected sites into favourable condition by 2042, with interim targets for 2028.

9. Notification of Dartmoor’s protected sites

9.1 Dartmoor is currently notified as a SAC comprising 25,452ha. It also has 6 notified SSSIs, with the 2 categorisations overlapping to a very large extent.

Table 2: Dartmoor SSSIs - number of units and year of notification

SSSI	Units	Year of original notification	Total area (ha)
North Dartmoor	18	1989	13,559.36
South Dartmoor	14	1989	7,113.77
East Dartmoor	22	1976	2,111.36
Dendles Wood	4	1965	49.88
Tor Royal Bog	2	1984	59.18
Wistman’s Wood	4	1985	267.9

Table 3: Dartmoor SSSIs - current condition assessment

SSSI	Total area (ha)	Favourable area (ha)	Unfavourable area – recovering (ha)	Unfavourable area – no change (ha)	Unfa
North Dartmoor	13,559.36	29.89	6,275.02	7,254.45	
South Dartmoor	7,113.77	318.74	3,679.30	1,589.61	

SSSI	Total area (ha)	Favourable area (ha)	Unfavourable area – recovering (ha)	Unfavourable area – no change (ha)	Unfa
East Dartmoor	2,111.36	845.17	992.31	0	
Dendles Wood	49.88	48.25	1.64	0	
Tor Royal Bog	59.18	24.48	34.69	0	
Wistman's Wood	267.9	267.9	0	0	
Total area	23,161.45	1,534.43	10,982.96	8,844.06	
Percentage of total area	100%	6.62%	47.42%	38.18%	

9.2 62% of all common land in Dartmoor is SSSI. Many commons are only part designated, but the absence of any physical barriers between SSSI and non-SSSI areas means there is significant potential for sites to be damaged by stock straying from adjacent areas. This is considered explicitly by NE when carrying out a HRA under the SAC. For this reason, the influence of the protected site designation extends significantly beyond the area of the sites themselves.

9.3 Some of these SSSI notifications are now more than 50 years old. We have not been able to find condition assessments for those sites at the time of notification, nor any consistent record of condition monitoring over time. NE has confirmed to us that a significant number of sites were not in favourable condition at the time of notification and may never have achieved that status in the intervening period.

10. Other statutory bodies with an interest in Dartmoor

10.1 As well as NE, there are a number of other bodies whose statutory responsibilities need to be considered in any balanced assessment of providing public benefits on Dartmoor.

10.2 The Dartmoor National Park was established in 1951 under the National Parks and Access to the Countryside Act 1949 (as clarified and modified by the Environment Act 1995). Under this legislation, the National Park's core purposes are to conserve and enhance the natural beauty, wildlife, and cultural heritage of the areas specified (the National Park) and to promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

10.3 The Dartmoor National Park Authority (DNPA) was also established under the framework of 1995 Environment Act to further the purposes of the National Park and to foster the economic and social well-being of local communities within it. The DNPA has submitted evidence to this review, amongst other things drawing attention to the legal duty of relevant authorities, including both NE and the Dartmoor Commoners' Council, to 'have regard to' the purposes of National Parks when carrying out their work. Such authorities should be able to demonstrate that they have fulfilled these duties and show how they have considered the purposes of these areas in their decision-making.

10.4 The DNPA also noted in its submission that National Park Authorities do not currently have a statutory or formal involvement with agri- environment schemes such as Countryside Stewardship, although such schemes are key to delivering National Park purposes. It referred to the conclusions of the Glover Review, including:

- protected landscapes (National Parks and Areas of Outstanding Natural Beauty -AONB) to have a central place in the environmental land management schemes
- National Park and AONB Management Plans to set a framework for all Environmental Land Management Scheme (ELMs) payments within their landscapes
- over time, for National Parks and AONBs to take a leading role in creating bespoke schemes for some landscapes

10.5 The DNPA offered its statutory management plan, 'the Dartmoor Partnership Plan', as providing a strategic vision behind which stakeholders could unite to make progress on Dartmoor. It also summarised a number of important initiatives as examples of partnership working and empowering farmers to take responsibility for providing public benefits:

Moorland Vision. In 2005, the various statutory agencies engaged on Dartmoor had combined to produce an infographic giving a vision of what the moor should look like in 2030. This was intended to create a shared vision for the future of Dartmoor and help farmers understand their role in delivering it. The vision was for a grazed landscape, the largest open space in Southern England, with all of its varied habitats in optimum condition. Fourteen Premier Archaeological Landscapes (PALs) were also identified, where management of the archaeology would be prioritised, while remaining sympathetic to ecological interests. The vision was subsequently reviewed and updated to account for

additional elements such as access and resources including water and carbon storage.

Dartmoor Farming Futures (DFF). DFF grew out of the Moorland Vision as an experimental pilot project, taking a deliberately bottom-up approach to agri-environment scheme design. Farmers were engaged in the design, delivery and monitoring of the environmental outcomes, using the Moorland Vision to identify and design outcomes based on public goods found on their own commons. DFF showed what could be achieved by empowering land managers and has been referred to positively by many of the commoners to whom we have spoken. However, it relied on existing HLS agreements to deliver payments and eventually ran out of momentum as an option for both NE and the commoners.

10.6 Both DFF and the Moorland Vision have been through several rounds of evaluation to help inform the future A-E schemes. John Waldon produced the [Dartmoor Moorland Vision and Dartmoor Farming Futures evaluation](https://www.dartmoor.gov.uk/living-and-working/farming/farming-futures) (<https://www.dartmoor.gov.uk/living-and-working/farming/farming-futures>) for the DNPA, which has been a valuable reference source for us and is worthy of detailed study.

10.7 The Dartmoor Commoners' Council was created under the Dartmoor Commons Act 1985 as the outcome of a long-running debate over access, livestock welfare and abuses of commons rights on Dartmoor. The Council is a body elected and funded by the commoners. Its primary function is to maintain the commons within the National Park and to promote proper standards of livestock husbandry on them. In discharging this function, it must have regard for the 'conservation and enhancement' of the natural beauty of the commons including their SSSIs (to be construed as including the conservation of its flora, fauna, ecological, archaeological and geological and physiographical features). It must also protect the commons and render (give) assistance to any commoner in the maintenance of his rights of common. It also has powers to make regulations to prevent the overstocking of the commons. To discharge its functions the Council maintains two registers: the first of grazing rights held by those who do not intend to turn animals out to graze and the second a 'live register' of rights held by active graziers.

10.8 There are a range of other bodies with statutory obligations relating to the management of Dartmoor. We have received a submission from Historic England as the government's statutory advisor on the historic environment. This noted that, while legislation exists to prevent damage to historic monuments, the conservation of the historic environment is mostly incentive-based and done in collaboration with other government departments, principally Defra through A-E schemes. Historic England believes that, when HLS agreements were first set up on Dartmoor, they were robust on the need to deliver outcomes for the historic environment. However, it is much less confident that agreements have since been maintained by NE with that initial ambition in mind.

Section 4: Commentary and findings

11. Overview

11.1 In our terms of reference, we were asked to identify examples of good practice that could be used more widely to achieve SSSI favourable condition. We have talked to many people on Dartmoor and also consulted with people on Exmoor (the Graze the Moor Project), Bodmin Moor, the Yorkshire Dales and the Cheviot Hills. We have not been able to find a legal template that can be applied universally to ensure good governance of commons, or a set of physical management techniques that will give good results in every situation. Transferable examples of good practice have also been hard to identify. Few if any Dartmoor commoners and commons associations are happy with their current situations.

11.2 However, there are plenty of examples of good collaborative projects and precedents for joined-up thinking going on across Dartmoor that could provide the basis of a strategy. Dartmoor also has young people who want to engage and develop their businesses.

11.3 From the submissions we have received, it is clear that Dartmoor generates strong emotions and opinions. Many people value it for its biodiversity and ecology, for others it is a gymnasium and a playground. For some it provides a much-needed opportunity to escape from the pressures of the modern world to recharge their mental and physical batteries. For its commoners and hill farmers, it is their workshop, a key element of their business plan and a core part of their cultural and family heritage.

11.4 It is also a highly contested landscape. We have received submissions expressing equally sincerely held but entirely opposing views, some of them accompanied by a degree of finger-pointing and blame attachment. We think this, together with some of the very high-profile public debate, is unhelpful. Dartmoor covers a big area and, with a degree of compromise and willingness to adapt, it should be possible to achieve an outcome that all can live with. It needs to function for the future as well as the past.

11.5 While some consider Dartmoor to be a wilderness, it is actually the product of thousands of years of men and women exercising their skill and ingenuity to make a livelihood from its apparently inhospitable environment. We believe that this active management will continue in the future. We do not believe that a positive outcome could be achieved by walking away and leaving Dartmoor to its own devices.

11.6 It is also not possible to turn the clock back to an era in the past and re-create what Dartmoor looked like then. We face a specific set of threats and

opportunities at this point in time. To identify and deliver the combination of public and private goods that Dartmoor is capable of producing in the twenty first century we need:

- careful data collection combined with good scientific analysis
- skilful management
- the building of genuine partnerships

12. Dartmoor's current vegetation and grazing management

12.1 Dartmoor is not in a good state.

12.2 Its hydrology, crucial to the good condition of peat bogs, wet heathland and valley mires, is severely compromised as a result of historic peat cutting and drainage. The moor is drying out in many areas. Work by the University of Exeter has identified that Dartmoor has 31,500ha of peatlands, either blanket bog or valley mires, but only 350ha of functionally intact blanket bog. Work has begun to address this by the South West Peatland Partnership, although there is much more to do. We commend this example of collaborative working.

12.3 Leaving aside areas of woodland and some valley mires, very few of its SSSIs have been judged by NE to be in favourable condition.

12.4 *Molinia*, deciduous purple moor grass, is out-competing other vegetation and creating a tussocky, bleached, landscape where few animals will graze apart from a short period in late spring and early summer. Nitrogen deposition and under-grazing have contributed to the development of this monoculture, but the degradation of Dartmoor's peat bogs has also played a part. *Molinia* prefers faster draining soils to standing water and boggy ground. Accordingly, some we have spoken to have expressed confidence that re-wetting can solve this problem on its own (although not in all situations). Others support more interventionist strategies: mechanical flailing and mowing to open up paths into the *Molinia* and the use of salt licks and supplementary feeding to tempt cattle and ponies to graze the affected areas, with sheep then following on. Others support still more direct intervention with burning or the use of herbicides followed by re-seeding. We have interviewed Geoff Eyre, an agricultural engineer and specialist in moorland restoration, about his work to successfully develop such an approach.

12.5 In addition to the *Molinia*, gorse and bracken are encroaching on the utilizable area of the moor as the result of reduced grazing and less swaling.

12.6 The encroaching scrub and *Molinia* tussocks are making access to Dartmoor more difficult (including for commoners, adding cost and danger to

their operations), causing increased erosion as more people and animals are channelled onto the few clear paths. These also become run-off channels for rain.

12.7 There is also a build-up of flammable vegetation across the moor (the fuel-load) and an increasing risk of large-scale wild-fires. Some commentators are inclined to play this down, pointing to the absence of objective data about any increased risk. However, Devon and Somerset Fire and Rescue Service and the commoners themselves believe they are sitting on a tinderbox. They are aware of the damage that could be done by a wildfire, including to valuable SSSIs.

12.8 Heather and dwarf shrubs are stunted and sparse. Different explanations are offered for this. Localised over-grazing by sheep plays a part. Some blame the Heather Beetle and viral diseases attacking bilberries and other dwarf shrubs. Others believe that more frequent burning is required to stimulate vigorous growth.

12.9 The question is, what to do about this and how to bring the SSSIs back into favourable condition? NE continues to put much faith in managing and often reducing grazing stock numbers, especially over-wintered sheep, but also cattle and ponies, particularly in the winter. It believes that in many cases further, radical, reductions in stocking numbers will be required to bring Dartmoor's protected sites back into favourable condition. In the current discussions on the extension of HLS agreements, it has also linked cattle and pony stocking rates in the negotiation of HLS extensions. It has suggested that the impact of each pony over-wintering on the moor (and there is no practical option to bring the animals in) should be offset by a reduction of two cattle grazing over the summer period. The commoners believe this is pitting cattle and pony keepers against each other and will lead to reductions in pony numbers.

12.10 NE local advisers have explained to us that, when the first round of HLS agreements was negotiated on Dartmoor, they would have liked to set lower stocking rates to conform with NE guidance on HLS moorland grazing rates. However, they were constrained from doing so by the need to secure take-up of agreements.

12.11 The commoners are adamant that the possible need for further stocking rate cuts was not explained to them when the HLS agreements were entered into. They view NE's current stance as reinforcing an already failed strategy. They have no confidence that it will achieve the required objective of bringing SSSI into favourable condition and bringing about the recovery of heather and dwarf shrubs. It also threatens to reduce stock numbers below the critical point where graziers will expend the time and resources needed to maintain animals out on the commons.

12.12 We have seen evidence that changing the balance of grazing and removing sheep may itself have unpredictable consequences in reducing

Dartmoor's biodiversity. This was well-illustrated by the work done on dung beetles by the Healthy Livestock Project (carried out by Clive Turner, with a group of active graziers from Holne Moor and Harford and Ugborough Commons Associations, working in partnership with the Dartmoor Hill Farm Project and Our Upland Commons).

12.13 There is no doubt that the reduction in stocking rates is causing significant livestock management problems for graziers. We have observed that an important part of learning, the learned instinct for flocks and herds to stay in a particular part of a common or area of open moorland, is for livestock to be held in place by other animals already grazing the contested areas. Once this competitive pressure is reduced, so the tendency to stray increases. Particularly, animals tend move in winter from the less palatable grazing areas of the central high ground to the less exposed borders of the moor. Sheep, especially, will search-out and graze heather and dwarf shrubs in preference to unpalatable *Molinia*.

12.14 How to keep animals in place on the open moorland is a key issue for the successful conservation grazing of Dartmoor. The impact of animals straying on to other commons and disrupting delivery of their agri-environment agreements is also problematic. The commoners we have spoken to believe that conventional shepherding can only play a very limited role in preventing this. They have also commented that reductions in the stock numbers that they can turn out on the commons have already reduced their incentive to devote time and energy to shepherding. No-fence collars are being used increasingly for cattle and knowledge is increasing about their role and limitations. Their use for sheep is also being investigated, although the cost-benefit analysis is different as sheep are lower value animals and kept in much larger numbers than cattle. Animal welfare can be a consideration if the collars are not used properly. Using them as a way of excluding stock from sensitive areas seems potentially useful.

12.15 The use of conventional fencing is controversial in an area such as Dartmoor. However, we wonder whether there should be a debate over its targeted use to protect vulnerable features until they are sufficiently mature and vigorous to withstand grazing.

12.16 The problem with vegetation management on Dartmoor is as much one of under-grazing as much as over-grazing and there is a danger of a vicious cycle developing. The area of *Molinia*, gorse and scrub expand because there are insufficient cattle and ponies to graze and trample them at critical times of the year (late spring and early summer). This encourages animals, and particularly sheep, to search-out heather and dwarf shrubs to graze in preference to the unpalatable *Molinia*. This in turn prompts further reductions in stocking rates as a policy response to the loss of heather. The *Molinia* expands again, triggering yet further stocking reductions. So, the cycle continues.

12.17 It does also need to be stressed how difficult it is to carry out mechanical operations on Dartmoor. It covers a huge area and many parts are extremely inaccessible. Its terrain is uneven, boggy and strewn with granite boulders able

to wreck even the sturdiest equipment. One of the unique attributes of the commoners is their familiarity with this environment and ability to work in it and move across it.

13. Natural England's engagement on Dartmoor

13.1 Dartmoor is a very challenging environment for NE to work in. Challenging because of its fragile and damaged landscape, with a wide range of almost uniquely valuable habitats, plants and species. Even more challenging because of the wide range of vested interests at play on the moor. Most challenging of all because of its strong-minded and combative farming community.

13.2 However, NE has not responded successfully to this challenge. We are concerned that, even now, it may not appreciate how completely its relationship with commoners has broken down on Dartmoor.

13.3 A key issue is the lack of dedicated resource NE has been able to deploy on the moor. Until recently there have been one and a half advisers managing the protected sites and the agri-environment agreements on Dartmoor and some other areas (reduced from over a dozen at one stage). This was insufficient to maintain relationships, provide a reasonable level of support and advice to agreement holders and, ultimately, to achieve NE's statutory environmental objectives. We understand this resource has recently been increased.

13.4 NE's local advisers have responded to this situation by becoming increasingly inward-looking and target driven, rather than by reaching out and building effective partnerships. Personal contact has significantly reduced and commoners have unanimously expressed the view to us that trust and communication have broken down.

13.5 However, most communications have to be channelled through commons association administrators to reach the individual graziers, with some inevitable loss of detail and explanation along the way. This poses real challenges for both the administrators and NE.

13.6 This created a difficult background against which for NE to introduce this latest round of changes to HLS agreements. However, the organisation doesn't appear to have anticipated, or been prepared for, the strong negative reaction it has encountered.

13.7 It will take time and a large amount of effort for NE to rebuild trust and respect on Dartmoor. It will only be able to do so by working closely and openly with the commoners and by building effective partnerships with other key stakeholder organisations.

13.8 However, this would not be a balanced narrative if we did not observe that at times commoners' frustrations have led to NE advisers being subjected to unacceptable abuse and hostility. This is not excusable under any circumstances.

14. Commonors attitudes

14.1 Dartmoor's hill farmers are tough, resilient and stubborn, with a deep sense of their culture and heritage. They are also fated to work collaboratively with each other, sometimes the same families over generations, because of the commoning system and the practicalities of livestock farming on Dartmoor's open moorland.

14.2 The progressive removal of BPS and the introduction of ELM poses real challenges for all LFA farm businesses. The Farm Business Income figures quoted in paragraph 7.6 illustrate why Dartmoor farmers are concerned and uncertain about their future at this time.

14.3 Their deep knowledge of Dartmoor and skillset should make them almost uniquely well equipped to deliver the range of public benefits that is now being demanded from Dartmoor. However, society's expectations are increasing and growing ever more complicated. Dartmoor's farmers need to understand the social contract they are being offered and feel confident that it offers a viable future for them and their families. They will need to be adaptable to meet challenging agri-environmental targets.

14.4 NE's demand for some reductions in stocking rates as a pre-condition for the extension of HLS agreements has struck a particularly raw nerve. Many graziers believe they are in danger of being forced off their commons altogether and are determined to resist this. Livestock are a key part of Dartmoor farmers' identities as graziers and pastoralists. They are proud of their stock and of their skills in managing them. Leared herds and flocks that are resistant to Dartmoor's disease pressures are a valued asset and passed down from one generation to the next. For tenant farmers, livestock are their main capital asset and a useful way to pass on assets to their successors.

14.5 There is a real danger of a stand-off developing at this point with NE's statutory powers being tested legally against the commoners' property rights as graziers. This would be wasteful, counter-productive and damaging.

14.6 It should also be un-necessary. The submissions we have received (including from NE itself) recognise the important role that grazing should play in the management of Dartmoor. It should therefore be possible to design a scheme, or schemes, that:

- protects Dartmoor's SSSIs and SAC

- has the support and confidence of Dartmoor's key stakeholders
- rewards commoners fairly for delivering a balanced package of public benefits

14.7 A number of submissions have pointed to the limited contribution that production from Dartmoor makes towards the nation's overall food supply and calorific requirement. They suggest that Dartmoor's farmers must accept that their primary role is to be conservation graziers and park keepers. We don't believe they need to make this choice. Animals from Dartmoor hill farms will continue to play an important part in the livestock supply chain, producing pedigree or store cattle and ewes to be sold for further crossing with more productive but less hardy breeds (the stratified sheep production system). Animals will also continue to be produced directly for the food chain and how best to add value to this process is one of the key challenges facing Dartmoor's farmers.

14.8 However, there is no reason why this traditional role can't be combined with carrying out conservation grazing and stewarding Dartmoor to a high, professional, standard. In future, A-E schemes will pay for achieving challenging environmental outcomes and providing other public benefits. Farmers everywhere are recognising that their businesses will have to alter significantly to benefit from this. Dartmoor's farmers are no exception, but this challenge offers opportunities as well as threats.

15. Other statutory bodies

15.1 Most of the statutory bodies that we spoke to (other than NE) expressed concern at the way HLS has become focused almost solely on the delivery of the Habitats Regulations and SSSI favourable condition. A-E schemes must be able to do this while also taking account of other statutory obligations. They must be capable of delivering a wide range of environmental and socio-economic objectives. NE also must be more open and collaborative in the way it engages with the other statutory bodies active on Dartmoor.

15.2 In terms of the statutory bodies themselves, we commend much of the work that has gone on under the leadership of the DNPA. Projects like the Moorland Vision and DFF have laid the foundations for what needs to happen next on Dartmoor. If Dartmoor's stakeholders and commoning community could come together to revive and deliver those initiatives, the effect would be transformative. It could also provide invaluable learning for other English upland areas. We are clear that DNPA has a crucial leadership and facilitation role to play.

15.3 The other statutory body with a key role to play on Dartmoor is the Dartmoor Commoners' Council. This has a broad range of legal powers to carry

out its functions and it is well served by its officers, who work hard to further the interests of Dartmoor's commoners. It is also mostly well-supported by the commoning community, who value it as a democratically elected forum in which they can debate issues and as a body which represents their views. However, a significant number of engaged and well-informed commoners believe that Dartmoor needs a further body to take on many of the functions that are currently the responsibility of the council.

15.4 To a significant extent, this view reflects frustration at the slow pace at which the council is able to make progress at times and the extent to which it gets bogged-down in revisiting the same issues multiple times. This, in part, is an inevitable consequence of Dartmoor's small and closely knit community and the difficult nature of some of the issues that the Council considers. However, it also reflects the inherent tension from the council being both a democratic discussion forum and a statutory enforcement body. We will make recommendations about the future role of the council in our conclusions.

15.5 Other statutory bodies, including both Historic England and the Rural Payments Agency (RPA), should look to play a higher profile and more proactive role in the management of A-E agreements on Dartmoor.

16. Protected site legislation and management

16.1 When we began this review, our starting point was to look at Dartmoor's protected sites to understand the extent of their legal protection, their current condition and, crucially, whether this is improving or declining. We were surprised how difficult it was to find and analyse this information.

16.2 While the main designations are reasonably generic, sites have been notified in different places for different features and information on their condition is difficult to pull together. NE has done its best to present this information on GOV.UK, but we are not surprised that the commoners find it hard to access and understand. This matters because understanding is the first vital step towards successful implementation.

16.3 Without the results of any consistent monitoring, it is impossible to know whether SSSIs were in favourable condition when they were notified, if they have achieved that status at any time since and what the trend is now. We suspect that many of the SSSI units have been in poor condition for a long time, so we are dealing with a chronic problem rather than something that has arisen recently.

16.4 We also note the almost universal feedback from commoners that they don't believe NE staff currently have the time and resource to carry out SSSI condition assessment rigorously. They believe NE is, at best, making flying visits to SSSI commons and making fairly cursory judgements of their condition.

16.5 The scientists on our panel also point out that condition assessment monitoring is intended to be a rapid appraisal tool. They believe there is a need for proper data capture with suitable baselines and scientific evaluation to go on alongside this. Further experimentation is needed to arrive at a fully informed view of what is happening to Dartmoor's SSSIs.

17. A-E schemes

17.1 Some years ago, the funds that NE used to reward farmers for managing SSSIs were merged into A-E schemes. On Dartmoor the two have become almost completely entwined and the objectives of HLS are focused primarily on achieving favourable SSSI condition. A-E schemes will play an increasing role in the delivery of government policy in the future, including on SSSI condition, and be used to deliver a wider range of public benefits. The relationship between the two policy strands (protected site management and A-E schemes) will therefore need to be disentangled and made more explicit.

17.2 The principles of Dartmoor Farming Futures should be considered as part of the development of A-E schemes. People need to be taken into partnership and allowed to play a far more active and responsible role in agreeing what needs to be done and in monitoring outcomes. This gives them ownership and responsibility, making them active stakeholders rather than passively following orders. It should also be to the benefit of NE. In the long term, better outcomes can be achieved, and scarce resources used to better effect, by working through others.

17.3 From what we have observed on Dartmoor, commons associations, and the few exceptional individuals who run them, are already over-stretched in meeting their existing obligations. Their capacity could easily become the limiting factor in delivering ELMS on common land. We understand why schemes relying on the collective delivery of outcomes are administered as they are, but policymakers will have to find ways to support commons associations meet their obligations and think laterally about the delivery of policy outcomes.

Section 5: Recommendations and conclusions

18. Vision and governance

18.1 Dartmoor cannot either stand still or retreat into its past. More than anything, it needs a Dartmoor-wide, landscape level, vision, supported by a clear delivery strategy. This will give its stakeholders a rallying point and a clear sense of direction.

18.2 We believe that the DNPA Partnership Plan provides such a vision and should be fully supported by Dartmoor's commoners and stakeholders.

18.3 We further recommend that Dartmoor's governance should be reinforced by the creation of a Land-Use Management Group, focusing particularly on protected areas (SAC and SSSIs) and surrounding land. This should be independently chaired and have both key stakeholder organisations and commoners' representatives in membership. Relevant government agencies and arm's length bodies (ALBs) (including NE) should also be represented and be fully committed to the success of the group.

18.4 The group should sit outside the governance structure of the National Park to avoid any potential conflict of interests over planning issues. It should work transparently and openly, creating a neutral space within which relationships between NE and commoners can be repaired and other interests discussed. It should facilitate the development of a plan to improve SSSI condition and deliver government targets on Dartmoor. The group will also need to develop a close working relationship with the emerging Landscape Recovery Groups.

18.5 The group should also be tasked with developing a Multi-Functional Land Use Framework for Dartmoor and creating a land-use plan, building upon the foundation of the Moorland Vision. There has been much discussion and several national reports recently about using Land Use Frameworks to make sense of, and aid decision-making on, the multi-functional use of land as the various demands made of it increase. Dartmoor, with its multiple stakeholders, would be a good test bed to develop these ideas further.

18.6 The group should also be responsible for identifying areas where Dartmoor-specific base-lined data needs to be collected, or where trials, research and experimentation are required (for instance into tickborne diseases, heather beetle, nitrogen deposition, heather restoration and exploring the links between vegetation and wider biodiversity). The output from this process should be fed into both the development of protected site management strategies and A-E scheme prescriptions. A publicly available central library of site monitoring data should be created, potentially to be managed by the National Park.

18.7 We have seen examples of successful heather moorland restoration in Yorkshire. We are not clear if the techniques are suitable, appropriate or viable on Dartmoor, but it is an example of the sort of research project that could be supervised by this group.

19. Protected site management

19.1 Having looked at the situation on Dartmoor, we believe that the complicated and multi-layered legal structure of protected sites should be simplified, but without being diluted or made less rigorous. We believe that some of the ideas contained in the Defra green paper of March 2022: [‘Nature recovery green paper: protected sites and species’](https://www.gov.uk/government/consultations/nature-recovery-green-paper) (<https://www.gov.uk/government/consultations/nature-recovery-green-paper>) are worthy of serious consideration. Management prescriptions for sites need to be clearer and easier to understand by those tasked with their care. The results of site monitoring must be made more transparent. For instance, classifying a site automatically as ‘unfavourable, recovering’ because it has been entered into an A-E scheme is misleading.

19.2 The concept of SSSIs should be revisited to ensure that they are compatible with and, can contribute towards, a vision to be delivered at a landscape or eco-system level. They need to be compatible with the concept of a landscape delivering a ‘mosaic’ of public benefits. The list of features that could result in notification should also be reviewed and potentially extended.

19.3 For Dartmoor’s SSSIs, particularly, more scientific monitoring and evaluation is required to assess their condition and to understand the influences impacting on them.

19.4 The notification of Dartmoor’s SSSIs needs ‘refreshing’, to ensure that the features which led to the original designation notification are still relevant after a considerable period and if there are additional features now requiring protection.

19.5 The present uncertainty over the legal position of commoners being treated as ‘owners and occupiers’ and subject to ORNEC for the purposes of the WCA needs to be resolved as soon as possible. The possibility of owners, tenants and commoners being treated differently with regard to the enforcement of SSSI requirements is creating unwanted additional tension between these parties.

20. Land-use, ecology and biodiversity

20.1 The absolute top priority for Dartmoor is improving its hydrology and re-wetting its blanket bogs. We understand that there is currently no guaranteed funding for this work beyond 2025. It is high cost (although this could fall as local expertise develops), but crucial to address climate change. We believe that there is a good case to be made for continued public funding. Sources of private finance also need to be investigated, as does charitable funding. A traded market in carbon-offsetting is still being developed but must be a

potential source of funding in the future. Dartmoor's use as a military firing-range adds significantly to the cost of re-wetting because of the need to check for and safely dispose of un-exploded ordnance. The Ministry of Defence should make a significant contribution to the cost of re-wetting according to the 'polluter pays' principle.

20.2 The relationship between re-wetting, achieving protected site favourable condition and HLS roll-overs (and other A-E schemes) also needs to be understood. Keeping commoners fully engaged in the re-wetting process is essential but, if the required capital investment is not forthcoming, they will not be able to meet targets to achieve SSSI favourable condition on those sites. The impact on their farm businesses will also need to be considered.

20.3 The second priority should be controlling *Molinia* through a combination of active management practices as set out in this report. This should be supported by Dartmoor-specific research into its growing habit and control, including grazing.

20.4 We note the work going on to extend Wistman's Wood. We believe there is potential to encourage the development of wood pasture and the growth of more trees generally on Dartmoor, particularly along indented valleys and gullies. This should be done as part of an agreed land use plan.

20.5 Restoring populations of heather and dwarf shrubs, especially bilberry, will make an important contribution towards improving Dartmoor's biodiversity and creating habitats. Over-grazing of heather and other dwarf shrubs means that they often only survive at the pioneer (early growth) stage. More research and monitoring are needed to understand the full range of environmental influences at work. We see heather restoration as part of a holistic approach to Dartmoor's recovery. Reducing *Molinia* and increasing the area of palatable grass on the moor will directly reduce the grazing pressure on these ecologically important plants.

20.6 Local initiatives to promote and restore biodiversity should be supported and encouraged, for instance the work being done to support Marsh Fritillary butterflies and the reintroduction of curlews.

21. Future of A-E schemes on Dartmoor

21.1 A-E schemes must deliver tangible benefits for nature. They should also be flexible, last long enough to provide a degree of certainty for business planning and provide sufficient reward to attract commoners into membership.

21.2 The relationship between A-E scheme prescriptions and the management of protected sites must be made more transparent and an agreed balance struck between the achievement of different objectives in future. On Dartmoor,

for the current generation of HLS agreements, achievement of protected site favourable condition has come to overshadow other objectives and considerations of scheme delivery.

21.3 Dartmoor needs a single A-E scheme covering the whole moor to lead and encourage strategic improvement (a whole of Dartmoor approach), or at the very least a small number of closely integrated and co-ordinated strategic schemes. We welcome the fact that a number of Dartmoor schemes have been accepted for the second round of Landscape Recovery. This is a good example of collaborative working and helpful to building understanding of how Landscape Recovery will work on Dartmoor. Strategic-level schemes can take some of the strain off schemes delivered through commons associations. Commoners should have the option to belong to both a local scheme on their common and to a Dartmoor-wide scheme. The possibility of introducing a Dartmoor-wide grazing scheme should be considered (like the [Verderers' Grazing Scheme in the New Forest](https://www.verderers.org.uk/grazing-scheme/) (<https://www.verderers.org.uk/grazing-scheme/>)). Stock could be entered directly into such a scheme. Health status and shepherding to avoid straying would be 2 possible criteria for such a scheme. The payment would have to be sufficient to reward the work involved.

21.4 Dartmoor Farming Futures is a good example of what can be achieved through partnership and empowerment. We believe that future schemes should engage farmers in helping to design, police and evaluate success. It might involve payment by results. We are aware of the Test and Trials work that looks at this. We have had positive reactions to this from commoners, particularly if it combines a base payment with some form of results-based reward. Our aim should be to reward entrepreneurial behaviour and innovation.

21.5 To succeed, Dartmoor's hill farmers and commoners will need to commit to this new way of working.

21.6 We have heard a lot about the potential environmental benefits of encouraging the re-integration of farming operations between the home holding and common land. Where farmers have A-E agreements on their home holdings, there should be options to reward those who demonstrate they have the required degree of integrated management of livestock and grazing between inbye land and open moorland.

21.7 We need to encourage risk-taking, experimentation and innovation to deliver good environmental outcomes and the associated public benefits. There needs to be a 'safe space' to do this. At the moment, the consequences in terms of loss of payments are still too severe to risk. The commoning governance structure also doesn't encourage risk-taking. People are very aware that they are gambling with others' money and of the need to exercise prudence.

21.8 The capacity of commons associations to administer A-E agreements needs to be increased and the associations helped to become more resilient.

21.9 There should be an initiative to develop the next generation of commons leaders on Dartmoor. This could be run by DNPA or the Dartmoor Hill Farming Partnership. Existing practitioners should be encouraged to participate to run sessions based on their personal experience and 'on the job' learning.

21.10 Knowledge transfer and the ability to exchange ideas on good practice is important. While carrying out this review, we have noted how much commoners have appreciated the opportunity to come together and discuss shared issues.

21.11 The possibility of creating a central resource on Dartmoor giving access to advice on governance and legal issues and to facilitation and mediation services should be examined. This could be run from either DNPA or DCC and potentially be paid for by commons associations out of scheme payments.

21.12 Some of the pressure over the distribution of scheme payments for CS agreements could be reduced by introducing set (hypothecated) prescription payments for individual actions. For example, if someone undertook to maintain a herd of autumn calving Galloways to undertake conservation grazing, the payment they would receive would be set centrally. This could also begin to address the issue of non-graziers receiving scheme payments, an issue on which we have received a lot of comments.

21.13 Commoners' associations and individual farmers should be encouraged to take appropriate professional advice as and when this will add value. (We have heard that less professional advice is used on Dartmoor than on Northern commons.)

22. Communication

22.1 Defra and its ALBs should find ways to improve communications with individual commoners on Dartmoor. This should include both high-level messaging and providing technical information relating to SSSI management and A-E schemes. At the moment we are placing undue reliance on commons associations to act as this conduit. This route can be erratic and is under pressure. Digital communication through Gov.UK is not providing a full answer at present.

23. Grazing and vegetation management

23.1 Dartmoor needs more cattle to carry out conservation grazing, particularly of Molinia and land recovered from Molinia. A-E schemes should encourage farmers to maintain herds of cattle for this purpose, with a premium for having animals available to graze in the late spring and early summer. It must be

considered in option design and payments that, even if the targeted grazing is required for only a short part of the year, the stock require year-round management. Farmers also need to have a reasonable degree of certainty about the duration of support before they make the considerable investment required to maintain a suckler herd.

23.2 Dartmoor's pony population is invaluable for conservation grazing and genetically important. We have seen industry estimates of a target population of between 1,000 and 2,500 head. Ponies and cattle should not be linked for the calculation of stocking rates and NE should not take actions likely to result in a reduction in their numbers.

23.3 Sheep are an important part of Dartmoor's hill farming system. They contribute to the moor's biodiversity and its cultural heritage. Maintaining 3 species grazing should be a key part of the vision for the future of Dartmoor. We believe that a holistic strategy should be implemented to increase the grazeable area of the moor and reduce the amount of *Molinia* and gorse. This will increase the palatable area available for grazing by sheep and therefore reduce the amount of localised over-grazing of heather and dwarf shrubs.

23.4 The 2 plus 3 (or 3 plus 2) standstill period we have proposed for HLS extensions will give sheep keepers the opportunity to demonstrate that they can shepherd their flocks to protect vulnerable heather and dwarf shrubs. If this isn't successful, we recognise that there will be pressure to remove sheep from parts of the moor for at least some of the winter. This could coincide with tupping and lambing. NE has a statutory duty to act where a SSSI or a part of the SAC is being damaged by over-grazing.

23.5 A service matching those offering off-wintering of sheep flocks with potential purchasers of that service could be considered to help manage sheep removal. Equally, support in providing more sheep accommodation on home farms may be required. However, the potential loss of disease resistance and learing must be acknowledged as an issue with both of these options.

23.6 Livestock straying is widespread and a major problem on Dartmoor. We have suggested that the introduction of a Dartmoor-wide grazing scheme could go some way to addressing this. This could be supported by the employment of agisters or reeves to intervene where persistent problems are occurring. We do know, however, that this suggestion has been debated at length by the Dartmoor Commoners' Council and defer to their knowledge in this area.

23.7 The future role of swaling needs to be fully debated. Its use on deep peat is already, correctly, closely regulated and controlled. However, there are many other situations in which it could play a useful role. We understand the environmental concerns about its use, but carefully judged and limited use of the technique may bring benefits that can't practically be delivered in any other way.

23.8 Leading on from this, wild-fire control and prevention needs to be afforded a high priority on Dartmoor. We note the work that the Dartmoor Commoners' Council is already doing to co-ordinate this and the excellent work by Ian Donovan of the Devon and Somerset Fire and Rescue Service to raise the profile of this issue and build delivery partnerships. The commoners already play a central role in this and precedent from other parts of the world tells us they are a crucial resource to help manage this risk.

24. Roll-over of HLS agreements

24.1 Some commons agreements are already reaching the end of the first year of the 1 plus 4 HLS roll-over formulation. There will therefore not be enough time to conclude negotiations for the following 4 years and still give commoners enough opportunity to make any required adjustments to their operations. We should therefore move to a 2 plus 3 default arrangement or consider 3 plus 2 (accepting that a small number of commons have already agreed 5-year terms).

24.2 The negotiation of extensions beyond the first 2 (or 3) year period should be managed jointly by Defra, NE, RPA and Historic England.

24.3 The first discussion of the options going forward should take place with representatives of all the affected commons associations. Bilateral discussions between NE and individual commons associations can follow. This would help foster open and transparent communications and avoid potential misunderstandings.

24.4 If there was a real risk of irreparable and unacceptable damage to a SSSI or the SAC, then NE should discuss this in the Land-Use Working Group before reaching a conclusion on appropriate remedial action.

24.5 The aim of the discussions should be to explore future options for affected commons as well as considering terms for an HLS roll-over. This should help to create a timeline and a profile for Dartmoor's commons to move to new schemes, helping to achieve an orderly and well-managed transition.

25. Recommendations for NE's future operations on Dartmoor

25.1 NE needs to recognise the scale of the challenge it faces to rebuild trust and confidence on Dartmoor. Significantly increased staffing resource will be required if this is to be achieved. NE must engage positively with the Land-Use Management Group.

25.2 There will also need to be a complete change of approach to NE's engagement on Dartmoor. Openness and the creation of partnerships are the key to successful delivery. Protocols will need to be established for visits and inspections. There should be a dedicated and senior communications lead, at least as an interim measure.

25.3 NE will also need to consider how the SSSI condition monitoring can be made more transparent and fit for purpose.

26. Other Dartmoor institutional recommendations

26.1 The Dartmoor Commoners' Council plays an invaluable role in the management of Dartmoor and must continue to do so. However, its current structure and operation should be reviewed to identify ways of reinforcing its effectiveness.

One option should be to:

- retain the present council to give strategic oversight and provide a forum in which commoners can debate issues of concern
- delegate its enforcement and operational activities to a smaller group with strengthened independent input.

Its working relationship with the Land-Use Management Group will also need to be developed.

27. Final comments

27.1 This report is the result of an intense period of work between August and December 2023. We present its conclusions to you and hope that it will contribute to the debate over the future of Dartmoor, something about which everyone we have spoken to cares very deeply.

Appendix 1: Summary of recommendations

Vision and governance

No.	Recommendation	Paragraph	To be actioned by
1	Need for a Dartmoor-wide vision at landscape level, supported by a clear delivery strategy.	18.1	Dartmoor stakeholder organisations (principally DNPA and DCC, but others too) supported by Defra and relevant Defra Arm's Length Bodies (ALBs) - principally NE and RPA.
2	Recommend DNPA Partnership plan as setting that vision.	18.2	Dartmoor stakeholder organisations, Defra and relevant Defra ALBs.
3	Reinforce Dartmoor's governance through creation of Land-use Management Group.	18.3	Dartmoor stakeholder organisations, Defra ALBs (NE will have a key role to play).
4	The Land-use Management Group should be tasked with developing a Multi-Functional Land Use Framework and a land-use plan for Dartmoor.	18.5	Dartmoor stakeholder organisations, Defra ALBs (NE will have a key role to play).
5	Central library of protected site monitoring data to be created, potentially to be held by the National Park.	18.6	Dartmoor stakeholder organisations, research bodies, NE.

Protected site management

No.	Recommendation	Paragraph	To be actioned
6	Protected site legislation should be simplified, to improve clarity and implementation without losing rigour (see the 'Nature recovery green paper: protected sites and species')	19.1	Defra, NE

No.	Recommendation	Paragraph	To be actioned
	https://www.gov.uk/government/consultations/nature-recovery-green-paper)).		
7	Concept of SSSIs to be reviewed, to ensure they are compatible with a vision to be delivered at landscape/eco-system level.	19.2	Defra, NE
8	More scientific monitoring and evaluation required to assess condition of Dartmoor's SSSIs and to understand the influences impacting on them.	19.3	Defra, NE Dartmoor stakehold organisati commons associatic
9	Designation and notification of Dartmoor's SSSIs to be refreshed, to ensure features are still relevant and no new features need to be added.	19.4	NE, Dartn stakehold organisati commons associatic
10	Uncertainty over legal position of commoners to be treated as 'owners and occupiers' for the purposes of WCA needs urgent clarification.	19.5	Defra and lawyers, commons stakehold organisati

Land-use, ecology and biodiversity

No.	Recommendation	Paragraph	To be actioned by
11	Top ecological and environmental priority for Dartmoor is to improve hydrological function and re-wet blanket bogs and peatlands.	20.1	Defra, NE, Dartmoor stakeholder organisations, commons associations, research bodies, South West Peatland Partnership.
12	The second priority should be to control <i>Molinia</i> , using a combination of active	20.3	NE, Dartmoor stakeholder organisations, commons associations.

No.	Recommendation	Paragraph	To be actioned by
	management practices, including grazing.		
13	Encourage development of wood pasture and tree growth in suitable locations, particularly along valley sides, as part of an agreed land-use plan.	20.4	NE, Dartmoor stakeholder organisations, commons associations.
14	More research and monitoring should be undertaken to understand full range of environmental factors impacting growth of heather and dwarf shrubs on Dartmoor.	20.5	Defra, NE, Dartmoor stakeholder organisations, commons associations, research bodies.
15	Local scale initiatives to create habitats and restore biodiversity should be promoted and supported.	20.6	NE, Dartmoor stakeholder organisations, commons associations.

Future of A-E schemes on Dartmoor

No.	Recommendation	Paragraph	To be actioned by
16	The relationship between A-E scheme prescriptions and the management of protected sites must be transparent and an agreed balance struck between achievement of different objectives in the future.	21.2	Defra, Defra ALBs (including RPA), Dartmoor stakeholder organisations, commons associations.
17	There is a need for a Dartmoor-wide A-E scheme to encourage strategic improvement and link commoners together.	21.3	Defra, Defra ALBs (including RPA), Dartmoor stakeholder organisations, commons associations.

No.	Recommendation	Paragraph	To be actioned by
18	Commoners should have the possibility to participate in both a local A-E scheme on their common and a Dartmoor-wide scheme.	21.3	Defra, Defra ALBs (including RPA), Dartmoor stakeholder organisations, commons associations.
19	The possibility of introducing a Dartmoor-wide grazing scheme should be considered.	21.3	Defra, Defra ALBs (including RPA), Dartmoor stakeholder organisations, commons associations.
20	Dartmoor Farming Futures should be used as an example of what can be achieved through collaboration and empowerment. Also the current Test and Trials Project taking place on Dartmoor.	21.4	Defra, Defra ALBs (including RPA), Dartmoor stakeholder organisations, commons associations.
21	Dartmoor's Hill farmers and commoners will need to commit to this new way of working.	21.5	Commoners, commons associations, Dartmoor stakeholder organisations.
22	Where farmers with moorland or commons grazing have an A-E agreement on the home holding, the possibility of introducing a prescription to reward integration of farming operations between inbye land and moorland grazing should be considered.	21.6	Defra, Defra ALBs (including RPA), commons stakeholder organisations
23	Need to develop a 'safe-space' to encourage risk-taking, innovation and experimentation by agreement holders.	21.7	Defra, Defra ALBs (including RPA), commons stakeholder organisations.

No.	Recommendation	Paragraph	To be actioned by
24	The capacity of Dartmoor commons associations to administer A-E agreements need to be increased and made more resilient.	21.8 to 21.13	Defra, Defra ALBs, Dartmoor stakeholder organisations, commons stakeholder organisations, commons associations.

Communications

No.	Recommendation	Paragraph	To be actioned by
25	Defra and ALBs should be tasked to identify ways of communicating more effectively with individual Dartmoor commoners.	22.1	Defra, Defra ALBs (NE).

Grazing and vegetation management

No.	Recommendation	Paragraph	To be actioned by
26	Dartmoor needs more cattle undertaking conservation grazing to combat the spread of Molinia. A-E schemes should include options to incentivise this.	23.1	Defra, Defra ALBs, Dartmoor stakeholder organisations, commons stakeholder organisations.
27	Dartmoor's pony population is genetically important and invaluable for conservation grazing. Ponies and cattle should not be linked for the calculation of A-E agreement stocking rates and NE should not	23.2	NE, Dartmoor stakeholder organisations. Commons associations.

No.	Recommendation	Paragraph	To be actioned by
	take actions likely to result in a decline in pony numbers.		
28	Maintaining three species grazing and recognising the contribution that sheep make to Dartmoor's heritage and biodiversity should be an integral part of the vision for Dartmoor.	23.3	Defra ALBs (particularly NE), Dartmoor stakeholder organisations, commons associations.
29	Reducing the area of Molinia and ungrazeable gorse to play a central part of a strategy to increase the palatable area of the moor for sheep (and other livestock) and address the localised over-grazing of heather and dwarf shrubs.	23.3	Defra ALBs (particularly NE), Dartmoor stakeholder organisations, commons associations.
30	Immediately, sheep keepers need to demonstrate they can shepherd their flocks to protect heather and dwarf shrubs from being over-grazed. If this isn't successful, we recognise there will be pressure to remove sheep from affected areas, for at least part of the winter.	23.4	Defra ALBs (particularly NE), Dartmoor stakeholder organisations, commons associations.
31	If sheep do need to be removed over-winter, the possibility of creating a service to match those offering sheep-keep with those requiring it should be considered. Also more support for providing sheep accommodation on home-farms.	23.5	Defra, Defra ALBs (particularly NE), Dartmoor stakeholder organisations, commons associations.
32	Positive action needs to be taken to address the issue of livestock straying.	23.6	NE, Dartmoor stakeholder organisations, commons associations.
33	The future role of swaling needs to be fully debated.	23.7	Defra, Dartmoor stakeholder organisations, NE.

No.	Recommendation	Paragraph	To be actioned by
34	Wild-fire control and prevention needs to be afforded a high priority on Dartmoor and the central role played by commoners in managing this recognised.	23.8	Dartmoor stakeholder organisations, NE. Devon and Somerset Fire and Rescue Service.

Roll-over of HLS agreements

No.	Recommendation	Paragraph	To be actioned by
35	The current one plus four extension formulation should move to default two plus three. Three plus two should also be considered.	24.1	Defra, NE, RPA.
36	Our recommendations for the conduct of negotiations over HLS extensions should be adopted.	24.2, 24.3 and 24.4	Defra, NE, RPA.
37	Discussions over the roll-over of HLS agreements should be broadened to include future options for the affected commons.	24.5	Defra, NE, RPA, Dartmoor stakeholder organisations, commons associations.

Recommendations for NE's future operations on Dartmoor

No.	Recommendation	Paragraph	To be actioned by
38	NE must recognise the scale of the challenge it faces to re-build trust and confidence on	25.1	NE

No.	Recommendation	Paragraph	To be actioned by
	Dartmoor. Significantly increased staffing resource will be required to achieve this.		
39	There will also need to be a complete change of approach to the way in which NE engages on Dartmoor. Openness and the creation of partnerships are the key to successful delivery. Protocols will need to be established for visits and inspections.	25.2	NE
40	NE should have a dedicated and senior communications lead for Dartmoor, at least as an interim measure.	25.2	NE
41	NE will need to consider how SSSI condition monitoring can be made more transparent and fit for purpose.	25.3	NE

Dartmoor statutory bodies

No.	Recommendation	Paragraph	To be actioned by
42	The structure and operation of the Dartmoor Commoners' Council should be reviewed to identify ways of reinforcing its effectiveness.	26.1	Defra, Dartmoor stakeholder organisations and Dartmoor Commoners' Council.

Appendix 2: Organisations and individuals who gave written submissions

Adam Windrum

Adrian Colston (PhD thesis)

Andrew Rothery

Andrew Terry

Ann Willcocks

Anton Coaker

Barnaby Spurrier and Jill Meager

Belstone Commoners' Association

Bodmin Moor Commons Council

Brent Moor Commoners Association

Bridget Cole

British Horse Society

C Bennett

Campaign for National Parks

Caroline Belam

Cat Frampton

Charlie Burrell

Charlotte Faulkner

Chris Clark (Nethergill Associates)

Christopher Hughes

Clare Stanton

Climate Action Plymouth

Cornwood Commoners Association

Country Land and Business Association (CLA)

Dartmoor Access Forum

Dartmoor Commoners' Council

Dartmoor Commons Owners' Association

Dartmoor Hill Farm Project

Dartmoor Hill Pony Association

Dartmoor National Park Authority

Dartmoor Pony Heritage Trust

Dartmoor Preservation Association

Dartmoor Society

Dartmoor Training Area (DARTA) Ministry of Defence

David & Corinna Legassick

David Venner

Dean Moor Commoners Association

Devon and Somerset Fire and Rescue Service

Devon Archaeological Society

Devon Climate and Biodiversity Lobbying and Advocacy Group

Devon Climate Emergency Partnership

Devon County Council Environment Group.

Devon Wildlife Trust

Doug Pratt

Dr Leonard Hurrell, Robert Hurrell and Andrew Hurrell

Dr Tom Greeves

Environment Agency (Dartmoor National Environment Advisory Group)

Exeter XR Biodiversity Group

Felicity Luscombe

Forest of Dartmoor Commoners Association & Peter Tavy Commoners Association

Foundation for Common Land

Friends of the Dartmoor Hill Pony Charity

FWAG SouthWest

Galloway Cattle Society

Game and Wildlife Conservation Trust

Geoffrey Fenton

Geoffrey Eyre

Gidleigh Common

Graham Colton

Graham Palmer

Graziers of the High Moor

Green Alliance

Gwyn Jones

H Radmore & A Willcocks

Harford & Ugborough Commoners Association

Harry Barton

Harry Gosling

Healthy Livestock Project

Heather and Roger Norrish

Helen Radmore

Henry Dimbleby

Historic England

Holbeton Parish Council

Holne Common HLS Association

HolneMoor & Harford & Ugborough Healthy Livestock Project

James Wotton

Janet Dwyer

Jemma Pyne & Stuart Taylor

Jen Gardner

John Cooper

John Hodge

John Howell

Jonathan Cuniowski

Joseph Hess

Joss Hibbs

Judy Dodd

Kate Morley

Ken Edwards

Kevin & Donna Cox

Layland and Gill Branfield

Lee Ann Martin

Lloyd Mortimore

Lydford Commoners' Association

Major Landowners Group

Marion Stanbury

Mark Radmore

Mat Cole

May Day Morris

Michael and Julia Cady

Michael French

Michael Owen

Michelmores - Partner Josie Edwards

Ministry of Defence Dartmoor Training Area (DARTA)

Modbury Parish Council

Moor Trees

Mr & Mrs Alexander Salmon & Hon DNC Salmon

Mr & Mrs Floyd

Naomi Oakley

National Farmers' Union of England and Wales

National Sheep Association

National Trust

Nick Viney

Norman Cowling

North Park Veterinary Group Ltd

Okehampton Commoners Association

Open Spaces Society

Pasture For Life

Peter Stevens

Philip French

Ralph Mackridge

Rare Breeds Survival Trust

Rattery Environment Group

Rees Jenkins

Rewilding Britain

Richard Bayly

Richard Gray

Richard Vines

Robert & Susan Greep

Roger Watts

Roland Chambers

Royal Society for the Protection of Birds (RSPB)

Russell Ashford

Sally Wonnacott

Sarah Gillespie

Shaugh Prior Commoners Association

Sheepstor Commoners' Association

Silas Gairdner

Simon Booty

Simon Oldridge

South Hams Climate Action Network

South Hams Tree Warden Network

South Tawton Commoners Association

South West Water

Spitchwick Commoners Association

STRAW Plymouth

Sustainable Blackawton

Tenant Farmers' Association

The Habitat Group

Tony Whitehead

Tracy Lear

Tracy May

WH & A Willcocks

Wild Card

Willingswall and Hentor Warren Commoners' Association

Woodland Trust

Yealm Estuary to Moor

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