



Dartmoor Nature Alliance response to the draft Dartmoor Partnership Plan 2027-2032

Response to the October 2026 public consultation draft [here](#) (including comparison with the September draft presented to the DNPA members meeting [here](#))

Overall response

Dartmoor Nature Alliance (DNA) welcomes the draft Partnership Plan's commitment to a nature-first approach, landscape-scale ecological restoration, naturally functioning habitats, peatland recovery, species recovery, natural regeneration, and regenerative farming.

These ambitions closely align with [DNA's Bringing Dartmoor Back to Life: A Call to Action](#), which advocates ecological recovery across the National Park, from upland peat and heathland to temperate rainforest, farmland and rivers.

DNA suggests that it also aligns with the [Duchy of Cornwall's Landscape Vision for Dartmoor](#), which advocates ecologically led grazing, restoration of heather and bilberry, peatland and hydrological recovery, natural woodland succession, and catchment-scale management. This convergence should give the Partnership confidence to translate its nature-first ambition into stronger ecological commitments.

Our principal concern is that the measurable targets do not consistently match the ambition of the outcomes. In particular, the October consultation version removed the previously proposed draft target to improve the favourable condition of Sites of Special Scientific Interest (SSSIs), weakened the soil-health target, and replaced a sustainable land-management outcome target with a measure of participation in agri-environment schemes.

We welcome improvements elsewhere, particularly increasing the peatland restoration target from 1,000 to 1,500 hectares. However, the Plan increasingly risks measuring participation in programmes rather than the ecological recovery those programmes are intended to achieve. Dartmoor's experience demonstrates the danger of this approach: despite decades of

agri-environment agreements and substantial public expenditure, many protected habitats have continued to deteriorate.

We therefore propose the following amendments.

1. Better for Nature and Natural Beauty

Outcome 1 – Nature-first decision-making

Target 1.1 – Nature-first approach

DNA position: Strongly support, but strengthen.

The commitment to nature-first decision-making is one of the Plan's most important provisions. However, it is not operationally defined, and there is no clear mechanism to show that it has influenced decisions, particularly where ecological restoration conflicts with established land-management practices.

Proposed replacement

By 2028, adopt and publish a nature-first decision-making framework, and ensure that all Partnership Plan delivery programmes apply it, prioritising ecological recovery, natural processes and the restoration of protected sites. Publish an annual report on decisions, trade-offs and ecological outcomes.

The framework should make clear how decisions are made when objectives compete, and how statutory nature conservation obligations are respected.

Target 1.2 – Natural environment baseline

DNA position: Support, but bring forward and expand.

The proposed 2032 completion date is too late. A baseline completed at the end of the Plan cannot adequately guide or evaluate its implementation.

Proposed replacement

By 2028, establish and publish a Dartmoor-wide natural environment baseline mapping the extent and condition of priority habitats, designated sites, hydrological condition and key species populations, with monitoring repeated throughout the Plan period.

This should be integrated into the proposed Dartmoor Data Observatory.

Target 1.3 – Landscape-scale nature recovery

DNA position: Strongly support, but require ecological outcomes.

The target of managing 40% of Dartmoor through coordinated landscape-scale nature recovery agreements by 2032 is welcome and potentially transformative.

However, an agreement does not prove ecological recovery is taking place.

Proposed replacement

By 2032, increase the proportion of Dartmoor managed through coordinated landscape-scale nature recovery agreements to at least 40%, accompanied by demonstrable improvements in habitat condition, hydrological function, ecological connectivity and priority species abundance.

Target 1.4 – Higher-tier agri-environment schemes

DNA position: Support appropriate funding, but strengthen accountability.

The consultation draft proposes that at least 70% of commons and farms should be in higher-tier agri-environment schemes by 2032.

This provides greater numerical specificity than the September draft, but raises two concerns.

First, the target counts commons and farms rather than necessarily measuring the area covered or the ecological outcomes delivered. Second, it risks treating scheme participation as a proxy for successful conservation.

Dartmoor's experience demonstrates why this distinction matters: extensive agri-environment funding has not, in itself, secured favourable condition across its protected habitats. In many cases, decline has continued.

Proposed replacement

By 2032, ensure that 100% of Dartmoor's commons and at least 70% of farms are covered by higher-tier or equivalent environmental land-management arrangements that deliver measurable ecological recovery. All agreements should include clear, monitored objectives to improve habitat condition and other relevant environmental outcomes, including hydrological function, water quality, soil health, and biodiversity. Report separately the land area covered and the ecological improvements achieved.

Outcome 2 – Connected habitats functioning naturally

Target 2.1 – Peatland restoration

DNA position: Strongly support the increased ambition, but strengthen the long-term commitment and ecological outcomes.

We welcome the increase between the September and October drafts from 1,000 to 1,500 additional hectares of peatland under restoration by 2032.

However, the scale of peatland degradation on Dartmoor demands a more ambitious, long-term approach. University of Exeter research identified approximately 2,900 hectares of significantly degraded peatland affected by erosion, drainage and historic peat cutting. This is only part of the wider problem: research also suggests that very little of Dartmoor's deep blanket bog remains functionally intact.

The Government's Protected Landscapes Targets and Outcomes Framework (PLTOF), published by Defra in 2024, establishes a national target to restore approximately 150,000 hectares of peatland across England's Protected Landscapes by 2050. Dartmoor National Park's locally apportioned contribution to this target is 8,030 hectares by 2050, as set out in the [Dartmoor Protected Landscapes Targets and Outcomes Framework](#). Although this local figure is provisional and subject to refinement using better evidence, it provides an important benchmark for the Partnership Plan.

Treat this as a minimum ambition rather than a ceiling, with the ultimate objective of restoring all Dartmoor's degraded peatlands where restoration is ecologically appropriate and achievable.

In addition, while the proposed 1,500-hectare target is a welcome step toward this ambition, the Plan must clarify whether it represents genuinely additional restoration beyond work already completed or underway. It must also distinguish between land brought under restoration and peatland whose natural hydrological and ecological functions are demonstrably recovering.

Proposed replacement

By 2032, bring at least 1,500 *additional* hectares of degraded peatland under active restoration, prioritising the most severely degraded areas, and demonstrate measurable improvements in hydrological function and ecological condition.

By 2028, establish a comprehensive assessment of Dartmoor's peatland condition and a funded, long-term programme to restore at least 8,030 hectares by 2050, consistent with Dartmoor's apportioned contribution to Defra's Protected Landscapes Targets and Outcomes Framework, with a more ambitious target where justified by evidence, and the ultimate objective of restoring all restorable degraded peatlands.

Publish a clear baseline distinguishing restoration already completed, under way or funded from genuinely additional restoration. Monitor and report separately on the area under restoration, the area where interventions have been completed, and the area demonstrating ecological recovery, measured through water-table recovery, reduced erosion and bare peat, characteristic peatland vegetation, and the restoration of peat-forming processes.

New target – Dwarf-shrub heathland recovery

DNA position: Essential addition.

The absence of a specific heathland target remains a major omission.

Restoring heather, bilberry, and structurally diverse heathland is central to recovering Dartmoor's upland biodiversity. It is also explicitly recognised in the Duchy Landscape Vision.

Proposed new target

By 2032, achieve measurable increases in the extent and favourable condition of dwarf-shrub heathland across Dartmoor, with all recoverable designated heathland features under effective recovery management and demonstrably improving by 2030. Grazing and other management should be determined by ecological condition and recovery requirements.

New target – Ecologically determined grazing

DNA position: Essential addition.

The Partnership Plan cannot credibly deliver heathland and other upland habitat recovery without addressing the grazing regimes that shape these habitats.

DNA does not advocate one stocking rate across Dartmoor. Different habitats and locations require different approaches, including higher mob-grazed stock in places, lower stocking densities in others, changes in livestock type, seasonal adjustments, shepherding and periods of rest.

Adaptive grazing is the key: the flexible management of livestock numbers, timing and distribution in response to changing vegetation conditions while supporting sustainable farming.

This will be supported by three pillars: active management (ie shepherding that responds to daily feedback loops), regular monitoring (at least quarterly) to ensure the required change in site condition is being achieved, and independent oversight to ensure nature-first decision-making.

There is important common ground with the Duchy Landscape Vision, which advocates landscape-scale, ecologically led grazing supported by monitoring. It envisages varying livestock densities, allowing habitats periods of rest and recovery, and limiting or halting winter grazing where heathlands are declining.

Our

Proposed new target

By 2030, establish and implement evidence-based, adaptive grazing regimes for all priority upland habitats and designated sites, with livestock type, numbers, density, seasonality and periods of rest determined by ecological condition and recovery requirements. By 2032, demonstrate measurable improvements in vegetation structure and grazing-sensitive habitat condition.

This should be accompanied by transparent monitoring, regular review, and mechanisms to adjust grazing where recovery is not occurring.

Target 2.2 – River recovery

DNA position: Support, but significantly strengthen.

The October draft retains a commitment to increasing the proportion of river water bodies achieving Good Ecological Status but no longer specifies a Dartmoor-wide percentage.

This is inadequate as a measurable target.

Furthermore, ecological recovery requires more than meeting a Water Framework Directive classification. It should encompass natural hydrology, river morphology, riparian habitat, ecological connectivity and reduced pollution.

The Duchy Landscape Vision similarly supports catchment-scale restoration, natural flood management, removal of damaging drainage and natural woodland succession along rivers.

Proposed replacement

By 2032, achieve a quantified increase, against a published 2026 baseline, in the proportion of Dartmoor river water bodies attaining Good Ecological Status or better, with no deterioration in status. By 2030, establish at least two whole-catchment river restoration programmes addressing natural hydrology, geomorphology, riparian habitats, ecological connectivity and pollution, with a trajectory towards at least ten programmes by 2035.

The final Plan should specify the numerical water-quality improvement target before adoption.

Target 2.3 – Wetland recovery

DNA position: Support, but accelerate implementation.

Complete the identification of priority wetlands early enough to allow meaningful restoration within the Plan period.

Proposed replacement

Identify priority wetland habitats, including Dartmoor's ecologically important valley mires, by 2028 and implement targeted restoration measures throughout the Plan period, demonstrating measurable improvements in ecological condition, hydrological function and climate resilience by 2032. Pay particular attention to important wetland habitats outside existing protected-site boundaries.

Target 2.4 – Soil health

DNA position: Restore and strengthen the earlier commitment.

This target has been substantially weakened between the September and October drafts.

The earlier version envisaged measurable improvements in soil organic matter and hydrological condition across monitored sites. The October version merely proposes promoting a baseline and encouraging improved practices.

This is a backward step.

Proposed replacement

By 2028, establish a representative Dartmoor-wide baseline and monitoring framework for soil health and hydrological condition. By 2032, demonstrate measurable improvements in soil organic matter, soil structure and hydrological function across at least 30% of monitored sites, with no deterioration at other monitored sites attributable to land-management practices.

The proposed 30% threshold is a DNA recommendation, to be tested against baseline evidence and the design of a representative monitoring programme.

New target – Managed burning

DNA position: Essential addition.

A wildfire prevention and response plan is welcome but does not address the ecological impacts of deliberately managed burning.

Proposed new target

By 2028, end managed burning on peat soils of any depth, and establish an evidence-based framework under which burning elsewhere is undertaken only where a demonstrable ecological benefit has been established and no preferable management alternative exists.

Address wildfire risk reduction, such as providing fire breaks, primarily through an integrated approach to vegetation management, including appropriate grazing and other measures that avoid unnecessary ecological damage.

Where burning is exceptionally justified on ecological grounds off peat soils, strictly control its timing, location, and extent to avoid wildlife damage. To reduce disturbance or destruction of nesting habitat, the end of the burning season will be brought forward to 15 March in 2027.

The date of 15 March is based on this study:

Zonneveld et al. (2024), "Timing of upland vegetation management affects breeding of three species of passerine birds: a case study from southwest England", published in Bird Study, 71(1), 76–86.

Outcome 3 – Species and habitat recovery

Target 3.1 – Landscape Recovery biodiversity

DNA position: Support greater specificity, but improve the metric.

The October draft replaces an unspecified biodiversity increase with a 5% increase in priority habitat condition and extent in Landscape Recovery areas.

A defined percentage is welcome, but habitat extent and condition should not be treated as interchangeable, nor as complete measures of biodiversity.

Proposed replacement

By 2032, achieve at least a 5% improvement in priority habitat condition within Landscape Recovery areas, accompanied by separately reported increases in habitat extent and measurable improvements in selected priority species populations, against published baselines.

Target 3.2 – Species Recovery Plan

DNA position: Strongly support.

The proposed 2028 Species Recovery Plan is welcome, including consideration of appropriate reintroductions.

It should contain measurable recovery objectives, not simply identify priority species. DNA also suggests agreeing on a representative suite of *indicator species*, with the target of halting and reversing decline, e.g., Curlew, Lapwing, Salmon

Proposed addition

Proposed target: Publish a Species Recovery Plan by 2028 with quantified population, distribution or breeding-success indicators. By 2030 halt and reverse the decline in an agreed, representative suite of Dartmoor indicator species; by 2032 demonstrate positive population or distribution trends for agreed priority species.

Target 3.3 – Priority habitat condition

DNA position: Support, but strengthen.

We welcome the target for at least 30% of priority habitat to be in good condition by 2030.

However, this must not allow deterioration or continued unfavourable management across the remaining 70%.

Proposed replacement

By 2030, at least 30% of Dartmoor's priority habitat will be in good condition, with all remaining recoverable priority habitat subject to effective recovery management and demonstrably improving.

Target 3.4 – Wildlife-rich habitat restoration

DNA position: Support.

The commitment to restore or create 1,887 hectares of wildlife-rich habitat outside protected sites is welcome.

Delivery should prioritise enlarging and reconnecting existing habitats, natural regeneration, riparian corridors, and ecological networks, rather than creating isolated habitats.

New Target 3.5 – Protected-site recovery

DNA position: Reinstate as a central, quantified target.

DNA is particularly concerned that the October consultation draft removed the target to improve the favourable condition of SSSIs that appeared in the September version.

This is arguably the most significant weakening of the nature recovery targets.

Dartmoor's SSSIs and internationally designated habitats are among its most important ecological assets. Their condition should be a central measure of whether the Partnership Plan is succeeding. However, only 16% of Dartmoor's SSSIs are in favourable condition.

DNA's Call to Action seeks recovery of all designated features by 2030 and favourable condition by 2042.

We therefore propose reinstating Target 3.5 with both an immediate recovery requirement and a quantified favourable-condition target.

Proposed new Target 3.5

By January 2028, recovery actions for at least 60% of recoverable SSSI features will be implemented and demonstrably on track. By 2030, 100% of recoverable SSSI features will be under effective recovery management with monitored improvement. By 2032, at least 35% of Dartmoor SSSI land will be in favourable condition, against a verified baseline, with a funded trajectory towards favourable condition for all recoverable designated features by 2042.

DNA proposes the 35% target as a meaningful interim ambition, rather than a figure set out in the draft Plan. The figure is the number of SSSIs in favourable condition across England (see [here](#)), and it seems reasonable that a DNPA should at least encourage land managers to work towards this target as a first stage. It should be validated against Natural England's current assessment data and ecological recovery timescales before final adoption.

The Plan should report both the percentage of SSSI land in favourable condition and the condition of individual designated features, to avoid aggregate figures concealing continuing deterioration.

Target 3.5 in the October draft – Invasive and Non-Native Species Strategy

DNA position: Strongly support; renumber following reinstatement of the SSSI target.

The proposed strategy is welcome. It should prioritise invasive species based on their ecological impacts and their relationship to habitat recovery, with transparent monitoring and evidence-based management.

DNA recommends treating Pheasant as invasive and non-native and asks the National Park Authority to review the damage this species causes and, where necessary, put measures in place to control problems effectively.

2. Better for Farming and Forestry

Target 1.1 – Environmental Land Management schemes

DNA position: Support, with stronger emphasis on ecological delivery.

We support advocacy for accessible and effective agri-environment schemes.

However, the objective must be long-term ecological recovery, not simply continuing or expanding existing funding arrangements.

Proposed addition

Give particular priority to schemes that reward demonstrable ecological recovery, enable adaptive grazing, support natural processes, and secure the restoration of designated habitats. Also, acknowledge and reward those areas already in good condition

Target 1.2 – Nature-friendly farming

DNA position: Significantly strengthen.

The target of 65% of land managers adopting nature-friendly practices across 10% of their land by 2030 is insufficiently ambitious for a National Park facing widespread ecological decline.

It also risks treating nature-friendly farming as something confined to a small portion of each holding.

Proposed replacement

By 2030, support at least 80% of Dartmoor farm businesses to implement whole-farm nature recovery plans incorporating soil health, water management, reduced inputs, habitat connectivity, natural regeneration and ecologically appropriate grazing, with measurable improvements in environmental condition.

This does not mean removing 80% of farmland from production. It means applying nature recovery principles across the farming system.

Target 2.2 – Dartmoor Land Use Framework and Data Observatory

DNA position: Strongly support, but strengthen transparency.

The proposed Land Use Framework and Data Observatory are among the most valuable mechanisms in the draft Plan.

They should provide accessible, regularly updated evidence of ecological recovery, including protected-site condition, priority habitats, grazing-sensitive vegetation, peatland hydrology, water quality, species indicators and environmental scheme outcomes.

Appropriate safeguards should apply to genuinely sensitive personal and commercial information.

Target 2.4 – Sustainable land management

DNA position: Reinstate the environmental outcomes target.

The September draft proposed increasing land under sustainable land management, accompanied by measurable improvements in soil, water, carbon and biodiversity.

The October draft replaces this with the same 70% higher-tier agri-environment scheme target already appearing under Nature Target 1.4.

This duplication should be removed.

Proposed replacement

By 2032, increase the area of Dartmoor under demonstrably sustainable land management, with a quantified hectare target established against a published baseline, and verified improvements in soil health, water quality, hydrological function, carbon storage, habitat condition and biodiversity.

Target 2.5 – Landscape-scale farming collaboration

DNA position: Strongly support, but link to ecological monitoring.

We welcome the target to increase farm participation in coordinated landscape-scale management by 40%.

This is closely aligned with DNA's ambitions and with the Duchy Landscape Vision's approach to collaborative, adaptive land management.

The target should explicitly include ecological grazing, species recovery and monitoring of habitat response.

3. Woodland and Forestry

Target 5.2 – Woodland condition

DNA position: Support, but quantify.

The commitment to increasing the proportion of woodland, scrub and temperate rainforest in favourable or recovering condition is welcome but lacks a specified percentage improvement.

The final Plan should establish a measurable target against the proposed 2028 baseline.

Target 5.4 – Woodland creation and restoration

DNA position: Support, but distinguish the outcomes.

In its 2021 Vision, Dartmoor National Park Authority set a goal to create 2,000 hectares of new broadleaf woodland (pages 8 and 9 [here](#)). DNA asks that this be reinstated rather than the newly proposed 570ha.

Also, the proposed 570-hectare target combines woodland creation, restoration and other woody habitat enhancement, including hedgerows and copses. These are all valuable, but they should not be reported as interchangeable.

Proposed replacement

By 2032, deliver at least 2000 hectares of native woodland creation, woodland restoration and woody habitat enhancement, prioritising natural regeneration where ecologically appropriate. Report separately the areas of new native broadleaved woodland, temperate rainforest restoration and expansion, natural regeneration, scrub, wood pasture and other woody habitat enhancement.

DNA's longer-term ambition to at least double natural broadleaved woodland and temperate rainforest across the whole National Park should inform this trajectory.

4. Better for Cultural Heritage

DNA recognises the importance of Dartmoor's archaeological and cultural heritage.

However, requiring heritage considerations in all relevant land-management and environmental funding projects should not disproportionately constrain ecological restoration.

We propose the following clarification to Target 2.4:

Where cultural heritage and ecological restoration objectives interact, decisions should be informed by the significance of heritage assets, ecological opportunity and proportionality, enabling natural processes and nature recovery wherever this can occur without unacceptable harm to significant heritage assets.

5. Better for People

DNA supports the proposed measures for responsible recreation, identifying sensitive areas and improving visitor information.

We suggest strengthening Target 3.2 to ensure visitor communications explain how behaviour affects wildlife, habitats, and nature recovery, including disturbance, fires, dogs, and inappropriate vehicle use.

6. Better for Business and Communities

New target – Dartmoor's nature-based economy

DNA welcomes support for resilient local businesses and communities but believes the Plan misses an opportunity to recognise nature recovery as a source of employment, skills, enterprise, and investment.

Proposed new target

By 2032, grow Dartmoor's nature-based economy by increasing employment, skills, businesses, and investment associated with peatland and river restoration, regenerative farming, woodland recovery, ecological monitoring, nature-based tourism, and other activities that contribute directly to nature recovery.

The Partnership should establish a baseline and measurable targets for nature-recovery employment and investment.

7. Cross-cutting themes and accountability

DNA supports the Plan's approach to climate change and future generations.

We welcome the commitment to annual progress in reducing greenhouse gas emissions, but suggest correcting the apparent duplication between climate Targets 2.1 and 3.1.

We also propose five principles applying across the Partnership Plan.

First, measure ecological outcomes, not merely activities. Scheme participation, agreements, plans and hectares under restoration should be accompanied by evidence of ecological improvement.

Second, establish meaningful baselines and numerical targets. All principal ecological targets should specify their baseline, measurement method, and intended improvement before adoption.

Third, prioritise the recovery of protected sites. Restoring SSSIs should be a central test of the Plan's effectiveness.

Fourth, make management adaptive. Where monitoring shows that agreed grazing, restoration, or other management is not producing the required ecological response, a clear mechanism should allow changes.

Fifth, report transparently. Publish an annual nature recovery report through the Dartmoor Data Observatory, showing progress against habitat condition, protected sites, hydrological recovery, river quality, species populations and other agreed indicators.

Partnership responsibilities and delivery

DNA is concerned about the lack of clarity about which partners will deliver the Plan's outcomes and targets, and what specific commitments they are making.

This is particularly important for nature recovery, where many of the decisions that determine ecological outcomes lie beyond the direct control of the National Park Authority. Natural England, Defra, landowners, commoners and other organisations all have important roles in determining land management, agricultural funding, habitat restoration and the condition of protected sites.

A Partnership Plan needs to do more than establish shared aspirations. It should identify which organisations are responsible for the actions necessary to achieve them.

For example, if the Partnership commits to restoring Dartmoor's SSSIs, who will be responsible for securing the necessary changes to grazing and other land-management practices? What commitments will the relevant partners make, and how will obstacles to delivery be resolved?

DNA therefore recommends that the final Plan include a published delivery schedule identifying, for each major target, the lead accountable organisation, the responsibilities and commitments of delivery partners, key milestones, funding requirements and arrangements for monitoring and corrective action.

Importantly, the Plan should distinguish between responsibility for coordinating delivery and responsibility for exercising the statutory powers, management rights or funding decisions needed to achieve an outcome.

We recognise that detailed delivery arrangements may follow the current consultation on outcomes and targets. Nevertheless, these arrangements should be agreed and published before the Plan is adopted.

Without clear allocation of responsibilities, there is a risk that collective ownership of the Plan becomes collective avoidance of accountability.

Conclusion

Dartmoor Nature Alliance welcomes the direction of the draft Partnership Plan and its commitment to putting nature first.

There is now substantial common ground between DNA's Call to Action, the Duchy Landscape Vision and the Partnership Plan's stated outcomes. This includes landscape-scale ecological restoration, peatland recovery, natural regeneration, habitat connectivity, species recovery, and land management informed by ecological evidence.

However, compared with the September draft presented to DNPA members, **the October consultation draft has weakened key measures of ecological accountability**. Most concerning is the deletion of the target for improving the favourable condition of SSSIs. The weakening of soil-health commitments and replacement of sustainable land-management outcomes with scheme-participation measures are also disappointing.

We urge the Partnership to reinstate a quantified protected-site recovery target, strengthen commitments to heathland, ecologically determined grazing, rivers, peatland and woodland, and ensure environmental schemes are judged by results.

Dartmoor's nature will not recover simply because more land enters agreements or more management plans are written. Success must be measured by recovering heathland, restoring functioning peatlands, expanding native woodland, cleaner and more natural rivers, healthier soils, improved protected sites, and increasing wildlife populations.

The commitment to put nature first provides the right foundation. The final Partnership Plan must now ensure its targets can turn that principle into visible, measurable recovery on the ground.