

GWCT Supplementary Evidence to Future of Uplands Inquiry.

To EFRA Chair and Committee.

The GWCT would like to provide some supplementary evidence in relation to *'How can government policy ensure that rural communities in upland areas benefit from changes?'*.

Environmental justice is a term used to describe the impact of environmental regulations and policies on different groups. There are a number of definitions but the following from the US Environmental Protection Agency is widely used - *'Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, colour, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.'* Whilst environmental justice is being used to highlight the risk of people living in some areas of England to higher pollution or flood risk or lack of access to green spaces, there is also the need to consider this in terms of the *"meaningful involvement of all people"* in environmental policy development and implementation, in other words procedural justice. Procedural justice involves different levels with implications for the application of government policy in upland rural communities (after Schreckenberg and Mistry - Integrating equity into IFM), namely:

1. Distributive equity - the need to focus on outcomes rather than top-down decision making.
2. Procedural equity - fairness in the decision making process such as accountability and effective participation through co-design. As the NE commissioned report described it, moving from 'power over' to 'power with' (Pound, D., Short, C., Bavin, S. et al (2025). *Enabling Positive Landscape Change to Deliver Landscape Resilience: the role of Landscape Governance and Landscape Justice. Natural England Commissioned Research*).
3. Recognition equity - the need to value and acknowledge all individuals for their contributions to knowledge, evidence and environmental sustainability. Experiential knowledge, generational knowledge, observational evidence, language used and knowledge of different cultures can be important aspects of this.
4. Contextual equity - the broader political, economic, social and cultural landscape that can constrain equity such as land tenure and discrimination.
5. Restorative justice - addressing past harms such as policies which have impacted livelihoods and knowledge and ensuring compensating mechanisms.

We also note that the NE Commissioned Research (NECR) referenced above addresses procedural justice in section 5.3 and proposes a framework characterised by process,

agency and treatment and seven levers for its delivery, based on this research - Ruano-Chamorro C., Gurney G. G., Cinner J. E. (2022) Advancing procedural justice in conservation. Conservation Letters. 15(3):e12861. <https://doi.org/10.1111/conl.12861>

The 2025 NECR also identified that current ways of working are not delivering procedural justice largely due to poor participatory decision-making and exclusion during the implementation. They gave an example of the recent LNR strategy which, although in theory is based on a co-production approach, in reality governance is focussed on a core group of environmental professionals. Here we provide some more examples specific to the uplands where this process has not been adopted -

- Dartmoor review of protected site management - [Independent review of protected site management on Dartmoor - GOV.UK](#) Section 13 reviews NE's performance and approach and paragraph 25.2 is particularly telling "*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.*" Hilary Cottam's independent review of the challenges facing upland farmers followed this.
- [Peak BlindSpots: a farmer-led scientific evaluation of peatland restoration](#)
- Attached (to the email) is an analysis of the views of 5 members of Peakland Environmental Farmers group by Charles Masquelier, Associate Professor of Sociology at Exeter University. This was part of a survey supported by the Heritage Lottery fund to evaluate IUCN Green Listing (more information available if required). And
- [Grazing for Good: Evidence review of Grazing Regimes for Nature Recovery](#)

Equity, justice and governance are also central to the debate around addressing wildfire risk, not only in terms of where the costs of a wildfire lie (air quality, loss of livelihood etc) but in terms of how to mitigate the risk and the adoption of cultural practices such as prescribed burning. This aspect was central to several presentations at the recent Leverhulme Wildfire Conference (July 2026).

Much of the background to concerns about environmental and procedural justice and the examples given is the lack of trust, the use of 'power over' rather than 'power with' (co-production) and the focus on communities of place, overlooking communities of interest and culture.

Any attempt to change procedural practices must be accompanied by some process of evaluation and on-going adaptation of the approach in response to learnings to ensure that trust is rebuilt and power re-distributed. An example might be to employ an impact evaluation to inform the strategy and allow for adaptation to improve effectiveness and

efficiency, allow for advocacy and communication, inform allocation of resources and ensure accountability to stakeholders (adapted from Adam et al 2018). Whatever the approach taken, evaluation needs to be framed as a vital part of the project/process and resource/skills allocated accordingly, a point made in the NECR as follows "*Our main recommendation [..], is for NE to shift investment from research to skills building [..] on regenerative governance, procedural justice, systems thinking, co-production for equitable sharing of benefits and better practices that adapt and evolve*". It is notable that the Cottam Review's proposal is seeking to engender the structural changes necessary and will include monitoring and evaluation.

As the NE Commissioned Research notes, good examples are few and far between but to demonstrate the art of the possible, I would like to draw your attention to this example of joint working -

[The Understanding Predation project identifies pathways to address conflict](#) (report - (PDF) [UNDERSTANDING PREDATION - A review bringing together natural science and local knowledge of recent wild bird population changes and their drivers in Scotland](#))

This was a project that addressed one of the most contentious issues in conservation, wildlife management. The project approach was novel from various perspectives, not least that it compared and contrasted findings from scientific literature and the understanding (including experiential knowledge) of stakeholders resulting in a more holistic knowledge base and identification of areas of joint/shared action in an area that is usually adversarial. This underlines the value of co-production.

Much of the global debate around environmental and procedural justice focusses on respecting the rights, stewardship and knowledge of Indigenous Peoples and Local Communities (IPLCs). The UK Government however does not recognise IPLCs as understood under the Convention of Biological Diversity given it is most often used to define first nation communities and their colonisation. Yet many of the Global Biodiversity Framework goals reference the value of IPLCs to their successful delivery. Arguably this lack of acceptance of the term in the UK context presents a problem to achieving appropriate equity and justice. The broader term 'local communities' was adopted to acknowledge communities who have specific identities tied to territories and natural resources and which employ customary practices transmitted through tradition – in other words they hold a collective experiential knowledge. In addition, traits of indigeneity include cultural practices, community and a shared identity and connection to the land. This would describe many aspects of land management in the UK such as hill farming (hefting practices), grouse moor management and common land systems.

Game & Wildlife Conservation Trust
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