

Moorland Association Assessment of the North York Moors National Park Management Plan 2022-2027

Red Flag Scan Summary

Phrase / Pattern	Location	Risk	Affects
"Promote / Ensure" everywhere, no mechanism	Objective 15, Objective 16, Objective 11	Aspirational text cannot be strictly implemented or monitored.	G2; C4; C19
"Will ensure" without delivery route	Objective 11	Creates unfunded or ownerless commitments without immediate funding tied to the action.	G4; C4-C6
Gamekeepers not mentioned where delivery implies keeper skills	Throughout (Mentions game shooting and raptor persecution, but not keepers)	Missing explicit recognition of key delivery partners on the ground.	C12
Wildfire treated as a footnote	Page 9	Mentions "increased risk of wildfire" but completely misses strategic, operational measures.	G5; C8
"Should" with no basis	Objective 1	Reads as quasi-policy ("The National Park should play a significant part..."); triggers defensiveness.	G1; C1; C5

Gateway Test Result: FAIL (Not consultation-ready)

The draft is categorized as **Not consultation-ready** due to failing the critical Gateway items required for a legally robust and deliverable consultation pack.

- **G1. Status, scope and "no policy-creep" safeguards: FAIL.** The document outlines the plan's purpose but lacks explicit "no new presumptions / no new tests" safeguards.
- **G2. Risk-to-Action Traceability: FAIL.** While broad pressures like climate change and biodiversity loss are identified, there is no matrix connecting these specific risks to actionable measures with distinct ownership.
- **G3. Legal robustness and signposting (HRA/SEA): FAIL.** The document is missing HRA/SEA screening summaries and transparent assumptions.
- **G4. Delivery realism: FAIL.** A Partnership Delivery Group is proposed, but the draft itself lacks detailed delivery sequencing, liability, and funding per objective.
- **G5. Wildfire operational reality: FAIL.** Wildfire is mentioned as a climate consequence, but operationally credible measures (fuel, access, water) are omitted.
- **G6. Plain English companion: FAIL.** A practical summary explaining voluntary vs. statutory requirements for land managers is not provided.
- **G7. Co-design evidence: FAIL.** The document notes it was "prepared with the help and support of many individuals and organisations", but fails to provide evidence of pre-consultation co-design and stress-testing directly with land managers.

Diagnostic Maturity Score: 29.1 / 100

Because the plan failed the Gateway Test, this score is strictly **diagnostic** to assist in prioritizing structural improvements. *(Note: The raw weights in the criteria sum to 128. Total calculated points of 37.25 have been normalized against 128 to generate a score out of 100).*

Category	Weight	Maturity Level (0-4)	Calculated Score
1. Status, scope & safeguards	8	1	2.00
2. Co-design before consultation	6	1	1.50
3. Plain English companion	5	0	0.00
4. Risk-to-Action Traceability	7	1	1.75
5. Delivery model & funding	9	2	4.50

Category	Weight	Maturity Level (0-4)	Calculated Score
6. Governance & conflict-resolution	6	1	1.50
7. Legal robustness (HRA/SEA)	7	0	0.00
8. Wildfire risk & resilience	8	1	2.00
9. Fuel-load management	5	0	0.00
10. Operational infrastructure	5	0	0.00
11. Heather moorland management	6	2	3.00
12. Gamekeepers recognized	4	0	0.00
13. Rural business viability	5	2	2.50
14. Working people, skills	5	2	2.50
15. Cultural living heritage	4	3	3.00
16. Property rights & consents	4	0	0.00
17. Animal welfare	4	0	0.00
18. Water management beyond peat	4	2	2.00

Category	Weight	Maturity Level (0-4)	Calculated Score
19. Biosecurity & invasive species	4	1	1.00
20. Data transparency & mapping	5	2	2.50
21. Enforcement & compliance	4	1	1.00
22. Cumulative burden / interaction	4	2	2.00
23. Communications & accountability	4	2	2.00
24. Species management realism	5	2	2.50

Required Fixes

To achieve consultation-ready status, the following actions must be addressed in feedback to the drafting team:

1. **Establish Boundaries:** Explicitly define the plan's status and insert safeguards against policy creep.
2. **Draft an Operational Companion:** Create a plain-English guide indicating specific implications, voluntary actions, and funding routes for land managers.
3. **Introduce a Risk Matrix:** Connect the identified pressures directly to actionable measures, assigning precise ownership and monitoring strategies rather than relying solely on the proposed Partnership Delivery Group.
4. **Outline Delivery Mechanisms:** Clarify who is responsible for delivery outcomes, the required sequencing, and long-term liabilities.
5. **Integrate Wildfire Strategy:** Implement a credible, operational section regarding wildfire as a core risk, including details on access, water, and maintenance.
6. **Include Legal Screenings:** Publish and easily signpost HRA/SEA screening materials and assumptions.
7. **Document Co-Design:** Showcase clear evidence of pre-consultation stress-testing and collaboration with operational land managers.

Priority Improvements

Based on the maturity diagnostic, these fundamental areas scored a **0 (Absent)** and must be developed from the ground up to prevent downstream friction:

- **Acknowledge Gamekeepers:** Neutrally and explicitly integrate gamekeepers into the delivery, workforce, and operations frameworks. While the draft addresses grouse populations and game shooting, it overlooks the workforce executing the management.
- **Address Property Rights and Consents:** Explicitly detail how the plan's objectives rely on landowner and tenant consents, offering feasible routes to secure agreements.
- **Operational Infrastructure & Fuel-load Management:** The draft must provide enabling language for essential access/infrastructure and a mapped, strategic approach to fuel-load management, especially given the aim to "reduce and find alternatives to burning".
- **Animal Welfare Realities:** Welfare impacts and mitigation must be considered where land management changes are implied.