

# Moorland Association Assessment of the Yorkshire Dales National Park Management Plan 2025-2030

## Red Flag Scan Summary

Phrase / Pattern	Location	Risk	Affects
"Support farmers and landowners" / "Encourage and support"	Objectives 1.2, 1.7, 2.3, 4.1, 4.4, 4.5, 5.7	Aspirational text cannot be implemented or monitored effectively.	G2; C4; C19
"Twenty-four organisations have lead responsibility... which will be available on the... website"	Guiding Principles (Page 6), Achieving these ambitions (Page 9)	Diffuse responsibility; nobody owns the obligation within the plan itself.	G4; C5; C6
"Degraded peatland" (Used exclusively without referencing heather moorland)	Objective 2.2	Erases heather moorland management realities.	C11
Omission of "Wildfire"	Entire Document	Misses a strategic climate and public safety risk.	G5; C8
"Plain English summary" absent	Entire Document	Operators cannot interpret implications; consultation churn increases.	G6; C3

## Gateway Test Result: FAIL (Not consultation-ready)

The draft must pass all Gateway items to be considered consultation-ready. The current document fails all seven minimum requirements:

- G1. Status, scope and "no policy-creep" safeguards: **FAIL**. While the draft explains its legal origins and describes itself as a framework, it completely lacks explicit "no new presumptions" or "no new tests" safeguards to prevent policy creep.

- G2. Risk-to-Action Traceability: **FAIL**. The plan outlines broad climate and nature impacts and connects ambitions to objectives. However, there is no traceable risk-to-measure matrix outlining specific ownership, triggers, and monitoring.
- G3. Legal robustness and signposting: **FAIL**. The document states that Habitats Regulations Assessments (HRA) and Sustainability Appraisals were conducted and are available on the website. It fails to provide transparent screening outcomes, pathways, and assumptions directly in the consultation draft.
- G4. Delivery realism: **FAIL**. Delivery leads are deliberately excluded from the document and hosted on an external website. Furthermore, the plan explicitly admits that funding is not readily available for its "transformational" objectives.
- G5. Wildfire operational reality: **FAIL**. There is absolutely no mention of wildfire risk, fuel load, or operational mitigation measures within the draft.
- G6. Plain English "What this means for land managers": **FAIL**. The draft does not contain a companion summary clarifying operational implications, funding routes, or what is voluntary versus legally required.
- G7. Co-design evidence: **FAIL**. While the plan mentions public consultations and input from farmers and landowners, it lacks transparent evidence of structured, pre-consultation stress-testing specifically with the land managers expected to deliver the objectives.

### Diagnostic Maturity Score: 26.75 / 100

Because the target document failed the Gateway Test, this score is purely diagnostic to help prioritize improvements. Any score below 60 indicates material weaknesses likely to generate avoidable conflict.

Category	Level (0-4)	Weight	Weighted Score
1. Status, scope and safeguards	1	8	2.00
2. Co-design before consultation	1	6	1.50
3. Plain English companion	0	5	0.00
4. Risk-to-Action Traceability	1	7	1.75

<b>Category</b>	<b>Level (0-4)</b>	<b>Weight</b>	<b>Weighted Score</b>
5. Delivery model & funding realism	1	9	2.25
6. Governance and conflict-resolution	0	6	0.00
7. Legal robustness (HRA/SEA)	1	7	1.75
8. Wildfire risk & resilience	0	8	0.00
9. Fuel-load management planning	0	5	0.00
10. Operational infrastructure	1	5	1.25
11. Heather moorland management	0	6	0.00
12. Gamekeepers explicitly recognised	0	4	0.00
13. Rural business viability	2	5	2.50
14. Working people, skills & capacity	2	5	2.50
15. Cultural living heritage baseline	2	4	2.00
16. Property rights & practical feasibility	1	4	1.00
17. Animal welfare & livestock management	1	4	1.00

Category	Level (0-4)	Weight	Weighted Score
18. Water management beyond peat	2	4	2.00
19. Biosecurity & invasive species	0	4	0.00
20. Data transparency & mapping pack	0	5	0.00
21. Enforcement & compliance	1	4	1.00
22. Cumulative burden / other plans	1	4	1.00
23. Communications & accountability	2	4	2.00
24. Species management & conflict realism	1	5	1.25
<b>Total Diagnostic Score</b>			<b>26.75 / 100</b>

## Required Fixes

To transition this draft into a consultation-ready format, the following critical steps must be taken to address the Gateway failures:

1. **Integrate Accountability Directly:** The plan must bring the specific delivery leads and funding assumptions back into the primary document rather than hiding them on an external website. This ensures public transparency and clear lines of responsibility.
2. **Draft a Companion Guide:** Produce a clear, plain-English summary specifically targeting land managers, strictly delineating which actions are statutory and which are voluntary, alongside clear funding routes.
3. **Address the Wildfire Void:** Develop and insert a dedicated strategy treating wildfire as a core climate and public safety risk, including practical operations for fuel load management, access, and water points.

4. **Publish Transparent Legal Baselines:** Embed summaries of the HRA and SEA findings directly into the plan. Stakeholders should not have to hunt for assumptions regarding in-combination effects or environmental impact pathways.
5. **Institute Policy Safeguards:** Explicitly state the plan's boundaries by adding a definitive "no new tests or presumptions" clause to prevent the document from being weaponized for unintended policy creep.

## Priority Improvements

Based on the maturity scoring, developing targeted messaging around these specific category gaps will yield the highest strategic value when communicating with partners:

- **Heather Moorland & Gamekeeper Recognition (Categories 11 & 12):** The draft focuses on "peatland restoration" without acknowledging the realities of heather moorland management or the essential workforce—gamekeepers—required to deliver these outcomes. Stress the need to explicitly detail these elements.
- **Governance & Conflict-Resolution (Category 6):** The document currently operates on the assumption of seamless partnership. Advocate for the inclusion of a clear, standing mechanism with defined triggers to resolve inevitable conflicts between competing ecological and agricultural objectives.
- **Data Transparency (Category 20):** Highlight the absence of an accessible map pack. A working landscape plan requires clear spatial data showing intervention zones, access hotspots, and constraints to allow local communities to accurately assess cumulative burdens.