

Moorland Association Assessment of the Management Plan for the Forest of Bowland Draft Management Plan 2026-2031

Red Flag Scan Summary

Red Flag Phrase / Pattern	Location	Why It Matters (Risk)	Affects
"The plan, which is in practice a strategy... guides the policy and practice"	Page 4	Ambiguity; signals potential policy creep without explicit "no new tests" safeguards.	G1, C1
"Encourage / promote / support" everywhere (e.g., "encourage appropriate management", "promote the uptake")	Pages 50, 52 (Measures 4G, 5E)	Aspirational text that cannot be implemented or monitored; creates "action soup."	G4, C4, C19
Generic tick-box delivery owners (e.g., column for "Conservation bodies and NGOs")	Throughout Part Two (e.g., Pages 43, 49)	Diffuse responsibility; nobody explicitly owns the obligation or funding route.	G4, C5
Wildfire treated with no operational detail ("maintain up to date fire plans", "raise awareness")	Pages 44, 59 (Measures 2D, 7H)	Fails to address strategic climate/safety risks (fuel continuity, water, access).	G5, C8, C9
"Avoid new track construction... on deep peat"	Page 44 (Measure 2G)	Implies a blanket presumption against essential operational/safety infrastructure.	C10
Gamekeepers only mentioned regarding loss ("Reduction in shooting tenants, leading to loss of gamekeepers...")	Page 40	Misses gamekeepers as vital delivery partners; frames management negatively.	C12

Gateway Test Result: FAIL (Not consultation-ready)

The draft fails 6 of the 7 minimum requirements necessary for a robust, deliverable consultation.

- **G1. Status, scope and "no policy-creep" safeguards: FAIL.** The document states it "formulates policy" but lacks explicit boundaries separating aspiration from statutory requirements, and includes no safeguards against implied new tests.
- **G2. Risk-to-Action Traceability: PASS.** Pressures and opportunities are listed prior to Outcomes/Measures, providing a basic trace from risk to proposed action.
- **G3. Legal robustness and signposting: FAIL.** There is no visible signposting, summary, or mention of HRA/SEA screening outcomes or pathways.
- **G4. Delivery realism: FAIL.** The plan relies on broad organizational groupings (e.g., "Conservation ALBs", "Land managers") without naming lead partners, funding realities, or long-term maintenance owners.
- **G5. Wildfire operational reality: FAIL.** Fire mitigation is limited to administrative tasks (updating plans, raising awareness) , ignoring fuel load management, access routes, and water points.
- **G6. Plain English "What this means for land managers": FAIL.** There is no practical companion summary explaining operational implications, voluntary vs. statutory expectations, or funding routes for the boots on the ground.
- **G7. Co-design evidence: FAIL.** The draft shows no evidence of meaningful pre-consultation co-design or stress-testing with gamekeepers, commoners, or estate managers.

Diagnostic Maturity Score: 29.25/100

(Note: Because the Gateway Test failed, this is a diagnostic score to prioritize structural improvements.)

Category	Wt.	Level (0-4)	Score
1. Status, scope & safeguards	8	1	2.00
2. Co-design before consultation	6	0	0.00
3. Plain English companion	5	0	0.00
4. Risk-to-Action Traceability	7	2	3.50

Category	Wt.	Level (0-4)	Score
5. Delivery model & funding realism +1	9	1	2.25
6. Governance & conflict-resolution	6	0	0.00
7. Legal robustness (HRA/SEA)	7	0	0.00
8. Wildfire risk & operational resilience	8	1	2.00
9. Fuel-load management planning	5	0	0.00
10. Operational infrastructure/access	5	1	1.25
11. Heather moorland management explicitly addressed	6	2	3.00
12. Gamekeepers explicitly recognised +1	4	0	0.00
13. Rural business viability	5	1	1.25
14. Working people, skills & capacity +1	5	2	2.50
15. Cultural living heritage	4	2	2.00
16. Property rights & consents	4	0	0.00

Category	Wt.	Level (0-4)	Score
17. Animal welfare & livestock management	4	0	0.00
18. Water management beyond peat	4	2	2.00
19. Biosecurity & invasive species	4	1	1.00
20. Data transparency & mapping	5	1	1.25
21. Enforcement & compliance	4	1	1.00
22. Cumulative burden / other plans	4	2	2.00
23. Communications & accountability	4	1	1.00
24. Species management realism	5	1	1.25
TOTAL			29.25/100

Required Fixes

To meet the Gateway criteria and become genuinely consultation-ready, the plan's authors must:

1. **Define Delivery Realism:** Update the Measures matrices (e.g., Pages 37, 43, 46) to name specific lead partners, funding assumptions, and long-term maintenance owners, moving away from broad, untargeted groupings.
2. **Add Operational Wildfire Detail:** Escalate wildfire from an awareness exercise to a strategic risk. Commit to mapped fuel-load management, strategic breaks, and infrastructure maintenance.
3. **Draft a Plain English Companion:** Produce a short, standalone document for farmers, gamekeepers, and estate managers clarifying exactly what is voluntary vs. statutory, and detailing funding pathways for the proposed measures.

4. **Incorporate Safeguards & Legal Assessments:** Add an explicit "no new presumptions / no new tests" safeguard and clearly signpost HRA/SEA screening outcomes.

Priority Improvements

Based on the diagnostic scoring, the lowest-performing areas require immediate strategic redrafting:

- **Gamekeeper Integration (Category 12):** Shift the narrative to recognize gamekeepers neutrally and explicitly as an essential delivery workforce for monitoring, fire response, and predator control. Remove framing that treats them strictly as an industry in decline.
- **Infrastructure & Consents (Categories 10 & 16):** Replace blanket restrictions on deep peat tracks (Measure 2G) with enabling language that balances landscape purposes with safe, necessary operational access. Acknowledge that delivery depends heavily on property consents and wayleaves.
- **Governance & Conflict-Resolution (Category 6):** Establish a published mechanism for resolving competing objectives (e.g., public access vs. ground-nesting birds, or peat restoration vs. historic features) with explicit review triggers.