



The Moorland Association

Moorland Association Upland Management Plan Drafting Checklist and Scoring Template (Draft VI.3)

1. Introduction

The Moorland Association (MA) and its members support high-quality management planning for protected upland landscapes. Our recent experience, however, is that many consultation drafts arrive with avoidable gaps that make feedback longer, more repetitive, and less constructive than it needs to be. Common issues include: unclear delivery logic; weak treatment of operational realities; ambiguous, aspiration-led wording that risks being interpreted as quasi-policy; and limited clarity on capacity, costs, responsibilities, and how measures will be implemented.

This checklist is intended as a constructive drafting tool to help those drafting plans to “get it right first time”. It sets out the minimum content and quality markers the MA will look for in future consultation drafts, so that consultation can focus on genuine choices and improvements - not preventable drafting and readiness issues. Once established, the MA will use this template as its standard method for assessing all draft upland protected landscape management plans and consultation packs that we are asked to respond to.

Recent consultations have required the MA to submit responses running to many thousands of words simply to address avoidable “basics” (missing clarity, evidence, delivery detail and legal screening signposting). This framework is intended to reduce that wasted effort by making consultation packs consultation-ready at the outset, so MA input can focus on genuine strategic choices, trade-offs and improvements.

This is not intended as a critique of individual teams. We recognise the constraints protected landscape staff work under (time, resources, complex evidence bases and partner governance). The purpose of this framework is to make expectations transparent early, reduce avoidable back-and-forth during consultation, and support quicker agreement on what “good” looks like so delivery can start with confidence.

Our aim is simple: better plans, faster, with less avoidable churn at consultation stage.

2. How to use this template

This template is designed for:

1. Plan authors and partner bodies preparing consultation drafts for protected upland landscapes.
2. MA members and staff reviewing consultation packs.
3. Other stakeholders who want a consistent, transparent way to judge whether a draft is genuinely consultation-ready.

It can be used in two ways:

- **As a drafting checklist** (before publication): to identify gaps early and strengthen clarity and deliverability.
- **As a review tool** (during consultation): to support consistent MA feedback and prioritise issues that matter most.

Quick Start (for reviewers)

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1. Red Flag Scan: Use Annex A to log the key drafting “triggers” and where they appear.
2. Gateway Test: PASS/FAIL the minimum consultation-ready requirements.
3. Maturity Scoring: Score each category 0–4 and apply weights to generate /100.
4. Document the assessment.

3. What “good” looks like

A consultation-ready draft management plan is:

- **Decision-useful:** clear what the plan is (and is not), how it will be used, and what it means in practice.
- **Legally robust:** assumptions and screening (eg. HRA/SEA) are transparent, proportionate, and defensible.
- **Deliverable:** risks and pressures link to measures with ownership, timescales, monitoring, and review triggers.
- **Operationally realistic:** reflects upland realities (access, wildfire response, maintenance, staffing, costs, constraints).
- **Co-designed and understandable:** tested with those expected to deliver it and explained in plain English.

A strong draft does not need to be perfect. It does need to be clear, bounded, and implementable.

4. Language convention

To reduce defensiveness and avoid any impression that the MA is setting quasi-regulatory requirements, this template uses the phrasing:

- “A consultation-ready draft should...”
- “Minimum content for a consultation-ready draft...”
- “MA will assess drafts against...”

This is deliberate. The focus is on consultation readiness and drafting quality, not creating new policy tests.

5. Assessment method

Assessment is undertaken in three parts:

Part A — Red Flag Scan (mandatory pre-check)

Before applying the Gateway Test or maturity scoring, we will complete a short Red Flag Scan using Annex A (Red Flag Phrases).

The purpose is to identify drafting patterns that reliably create avoidable consultation churn, including: implied “policy creep”; requirement-like language without clear basis; unfunded or ownerless commitments; aspiration without delivery mechanisms; and default framing that risks implied presumptions against lawful land management.

Output: a brief Red Flag Register (typically 5–15 lines) recording:

- the phrase (or drafting pattern)
- where it appears (section/page)
- why it matters (one line)
- and which checklist category (or Gateway item) it affects

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This register should then inform Gateway decisions and the maturity scores.

Part B — Gateway Test (Consultation-ready minimum)

Outcome: PASS / FAIL

The Gateway Test is a rapid quality assurance check: it identifies whether a draft is consultation-ready or whether fundamental issues make meaningful consultation impossible.

- If a draft fails any Gateway item, the overall result is not consultation-ready.
- The MA may still complete maturity scoring (Part C) as a diagnostic, but the overall finding remains not consultation-ready until the Gateway Test is met.

A Gateway “fail” should be read as “not yet consultation-ready” (a fixable drafting/readiness issue), not as a judgement on ambition or intent.

Part C — Weighted maturity score (0–100)

If the Gateway Test is passed, the draft is scored using a maturity model:

Maturity levels

- 0 = Absent (not addressed)
- 1 = Mentioned (general intent; aspiration-led)
- 2 = Defined (clear what/why; limited delivery detail)
- 3 = Implementable (who/when/how/monitoring is clear; feasible)
- 4 = Embedded (assured/tested; resourced; reviewed; continuous improvement)

Score calculation

For each category: $(\text{Maturity level} \div 4) \times \text{Category weight}$

Total maximum = 100.

Worked Example:

- Category weight: 9
- Maturity level awarded: 3 (Implementable)
- Category score = $(3 \div 4) \times 9 = 6.75$
Repeat for all categories and sum the category scores to produce the total /100.

Note 1: The MA may still score a plan that fails the Gateway Test to show relative strengths/weaknesses and provide structured feedback, but the headline status remains not consultation-ready.

Note 2: If a plan fails the Gateway test, the score is reported as a “Diagnostic score (Gateway failed)” and the headline rating remains ‘not consultation-ready’. This prevents the maturity score masking failure.

Reporting format:

- Red flag scan: summary
- Gateway: PASS/FAIL (list failed items)
- Diagnostic maturity score: XX/100 (for improvement prioritisation)
- Required fixes: actions needed to pass Gateway
- Priority improvements: lowest scoring categories

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Interpretation guide (after scoring)

- 80–100: Strong draft; MA comments can be focused and proportionate.
- 60–79: Usable but needs targeted strengthening (often delivery detail, mapping, enforcement realism).
- <60: Material weaknesses likely to generate avoidable conflict and churn.
- Any Gateway FAIL: not consultation-ready (score may be provided diagnostically).

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Part B — Gateway Test: Consultation-ready minimum (Pass/Fail)

A draft should PASS all Gateway items listed below.

G1. Status, scope and “no policy-creep” safeguards

The draft clearly states what it **is and isn't**, separates aspiration/guidance/statutory requirement, and avoids implied new tests or presumptions.

G2. Risk-to-Action Traceability

Significant risks/pressures identified in the draft have linked measures/actions with ownership and monitoring.

G3. Legal robustness and signposting (HRA/SEA, as applicable)

Screening/assessment outcomes are easy to find and assumptions are explicit (including in-combination and pathways).

G4. Delivery realism (who does what, by when, with what resourcing)

The draft explains delivery architecture, sequencing, and maintenance/liability where relevant.

G5. Wildfire operational reality (where relevant to uplands)

Wildfire is treated as a strategic climate/public safety risk with operationally credible measures (fuel, access, water points, maintenance).

G6. Plain English “What this means for land managers”

A clear companion summary explains implications, voluntary vs required, and routes to support/funding.

G7. Co-design evidence

The pack shows meaningful pre-consultation co-design with land managers (including farmers and gamekeepers where relevant), not consultation-only engagement.

Quality assurance: stakeholder stress-testing

A consultation-ready draft should show evidence of pre-consultation stress-testing for:

- unclear or ambiguous commitments
- unintended presumptions
- deliverability gaps
- and how the draft reads to those expected to deliver it.

This can include structured land-manager review sessions. Where no evidence of any pre-testing is provided (and no explanation is given), this should be treated as a quality red flag, because it increases the likelihood of avoidable ambiguity and repeat consultation churn.

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Part C — Weighted maturity scoring template (0–100)

How to score: assign a maturity level (0–4) for each category, then calculate the weighted score.

Reviewers should normally score all categories in Part C. Only mark a category n/a where it is genuinely not relevant to the draft's scope (eg. the plan area plainly lacks the feature/theme, or the consultation pack explicitly excludes it). Where n/a is used, record a one-line reason and rebase the weights across the remaining applicable categories so the total remains /100 (ie. remove the n/a category weight from the denominator and scale the remaining weights proportionally). If more than three categories are marked n/a, add a short note explaining why the draft's scope is unusually narrow.

1) Status, scope and “no policy-creep” safeguards (Weight: 8)

A consultation-ready draft should:

- Make clear the plan's status and intended use.
- Separate aspiration, partnership intentions, guidance, and legal/statutory requirements.
- Include an explicit “no new presumptions / no new tests” safeguard.

Maturity 4: prominent safeguards; examples of boundaries; consistent language throughout.

2) Co-design before consultation (Weight: 6)

A consultation-ready draft should:

- Evidence co-design with farmers, graziers, gamekeepers, commoners, estate managers and contractors (as relevant).
- Show what changed as a result.

Maturity 4: representation, dates, methods, and a change log.

3) Plain English “What this means for you” companion (Weight: 5)

A consultation-ready draft should:

- Provide a short practical summary for land managers.
- State what is voluntary vs expected vs statutory.
- Explain operational implications, funding routes and contacts.

Maturity 4: tested for clarity; updated alongside the draft.

4) Risk-to-Action Traceability (Weight: 7)

A consultation-ready draft should:

- Link each significant factor/risk/pressure to at least one measure.
- Specify ownership, timing/triggers, monitoring, and maintenance where relevant.

Maturity 4: auditable risk linked to measure matrix included.

5) Delivery model, funding realism, maintenance and liability (Weight: 9)

A consultation-ready draft should:

- Set out who leads delivery for each outcome/measure.

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- Explain sequencing and dependencies.
- Address long-term maintenance, liabilities and “who owns the obligation”.

Maturity 4: credible resourcing assumptions; maintenance owner identified for each intervention type.

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6) Governance and conflict-resolution with triggers (Weight: 6)

A consultation-ready draft should:

- Include a standing mechanism for resolving conflicts between objectives.
- Define triggers for review and adaptation.

Maturity 4: convenor, escalation route, evidence rules, and published review cycle.

7) Legal robustness and assessment clarity (HRA/SEA/in-combination) (Weight: 7)

A consultation-ready draft should:

- Make screening/assessment materials easy to locate and understand.
- Set out pathways, in-combination effects, and assumptions.
- Clarify what is deferred to project-level assessments and how risks are controlled meanwhile.

Maturity 4: plain-language summary + transparent pathways and assumptions.

8) Wildfire risk and operational resilience (Weight: 8)

A consultation-ready draft should:

- Treat wildfire as a strategic climate/public safety risk.
- Address severity and drivers (fuel continuity/load, ignition pressure, drought conditions).
- Commit to operationally credible measures with maintenance responsibilities.

Maturity 4: integrated operational framework aligned with partners' capabilities.

9) Fuel-load management planning and strategic layout (Weight: 5)

A consultation-ready draft should:

- Commit to (or include) a fuel-load management plan: mapping, strategic breaks, access and water, maintenance, and review triggers.

Maturity 4: mapped zones and a practical maintenance/inspection regime.

10) Operational infrastructure and emergency access (Weight: 5)

A consultation-ready draft should:

- Provide enabling language for essential access/infrastructure (tracks, turning, bridges/culverts, telecoms, water points, drainage maintenance) with sensible design safeguards.

Maturity 4: clear compatibility statement + standards/approach and responsibilities.

11) Heather moorland management explicitly addressed (not just “peatland”) (Weight: 6)

A consultation-ready draft should:

- Include a dedicated section on heather moorland management (mosaic/age structure, fuel implications, lawful tools including grazing/cutting/burning where lawful).
- Explain trade-offs and monitoring.

Maturity 4: spatially specific approach with adaptive triggers.

12) Gamekeepers explicitly recognised as delivery partners (Weight: 4)

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A consultation-ready draft should:

- Refer explicitly and neutrally to gamekeepers where relevant to delivery (monitoring, fire response, predator control, habitat and access upkeep).

Maturity 4: embedded into delivery, workforce and operations sections.

13) Rural business viability and socio-economic realism (Weight: 5)

A consultation-ready draft should:

- Recognise viability as a condition of delivery.
- Identify likely impacts on grazing systems, sporting enterprises, contractors and supply chains.
- Avoid unfunded expectations.

Maturity 4: impacts assessed and mitigations/resourcing described.

14) Working people, skills and capacity (Weight: 5)

A consultation-ready draft should:

- Recognise workforce and skills requirements (keepers, shepherds, contractors, ecologists, machinery operators).
- Address capability gaps and procurement realities.

Maturity 4: credible capacity and skills plan with responsibilities.

15) Cultural living heritage and working landscape baseline (Weight: 4)

A consultation-ready draft should:

- Recognise uplands as living cultural landscapes shaped by management and communities.
- Avoid “landscape despite people” framing.

Maturity 4: integrated into objectives and narrative consistently.

16) Property rights, consents and practical feasibility (Weight: 4)

A consultation-ready draft should:

- Acknowledge that delivery depends on consents and permissions (landowner/tenant/common rights; wayleaves; access for works).
- Explain feasible routes to agreement.

Maturity 4: feasibility statement plus consent pathways for major measures.

17) Animal welfare and livestock management reality (Weight: 4)

A consultation-ready draft should:

- Consider livestock welfare and operational practicality where management changes are implied (gathering, fencing, hefting, dog pressure, predation).

Maturity 4: welfare impacts considered with mitigation and monitoring.

18) Water management beyond peat (Weight: 4)

A consultation-ready draft should:

- Address catchment realities: drought, flood peaks, water quality, farm infrastructure interactions, and maintenance responsibility.

Maturity 4: integrated catchment approach with clear responsibilities/trade-offs.

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19) Biosecurity, disease and invasive species pathways (Weight: 4)

A consultation-ready draft should:

- Include practical controls for invasive species and biosecurity (including recreation/works pathways).

Maturity 4: protocols linked to monitoring and responsibilities.

20) Data transparency and mapping pack (Weight: 5)

A consultation-ready draft should:

- Provide a map pack (or commit to provide) showing designations, habitat intent, intervention zones, wildfire risk areas, access hotspots, constraints and where tools apply.

Maturity 4: accessible maps/data and assumptions stated.

21) Enforcement, compliance and proportionality (Weight: 4)

A consultation-ready draft should:

- Where restrictions are proposed (fires, dogs, parking, access), explain enforceability: who enforces, how funded, and how burdens aren't displaced onto land managers by default.

Maturity 4: resourced, enforceable measures with ownership.

22) Cumulative burden / interaction with other plans (Weight: 4)

A consultation-ready draft should:

- Explain how this plan interacts with LNRS, Local Plans, ELM, forestry targets, water company programmes, access strategies and other relevant plans.
- Identify conflicts and how they will be handled.

Maturity 4: compatibility statement + conflict-handling process.

23) Communications and accountability to local communities (Weight: 4)

A consultation-ready draft should:

- Set out communications, points of contact, complaint/conflict handling, and transparency/reporting commitments.

Maturity 4: comms plan including a feedback loop and published reporting.

24) Species management and conflict realism (Weight: 5)

A consultation-ready draft should:

- Recognise species conflicts and management trade-offs (predator-prey dynamics, invasive species, herbivore impacts).
- Define evidence standards, monitoring and triggers.

Maturity 4: clear process and agreed evidence rules and review triggers.

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