Moorland Association Assessment of the Northumberland National Park Management Plan 2022-2027

Red Flag Scan Summary

Phrase / Pattern	Location	Risk	Affects
"Encourage / support / promote" everywhere, no mechanism	Objectives 1.2, 2.2, 2.3, 4.3 (Pages 18, 22, 23, 31)	Aspirational text cannot be implemented or monitored.	G2; C4; C19
"Will ensure / will deliver" without delivery route	Foreword (Page 3), Objective 5.1 (Page 34)	Creates unfunded or ownerless commitments.	G4; C4-C6
"Peatland restoration" used as umbrella for everything	Objective 1.1 (Page 18)	Erases heather moorland management realities.	C11
Gamekeepers not mentioned where delivery implies keeper skills	Throughout the document	Missing delivery partners; risks fostering mistrust.	C12
Wildfire treated as a footnote / Absent	Entire document (Omitted entirely)	Misses strategic climate and public safety risks.	G5; C8

Gateway Test Result: FAIL (Not consultation-ready)

The draft is explicitly categorized as **Not consultation-ready** due to failing all 7 critical Gateway items.

- **G1. Status, scope and "no policy-creep" safeguards: FAIL**. The document lacks explicit "no new presumptions / no new tests" safeguards to prevent policy creep.

- **G2. Risk-to-Action Traceability: FAIL**. While broad pressures are identified, there is no matrix connecting specific risks to actionable measures with distinct ownership.

- **G3. Legal robustness and signposting: FAIL**. The document is entirely missing HRA/SEA screening summaries and transparent assumptions.

- **G4. Delivery realism: FAIL**. The draft outlines extensive goals but does not explain the delivery architecture, sequencing, or long-term liabilities.

- **G5. Wildfire operational reality: FAIL**. Wildfire is completely omitted as a strategic climate and public safety risk.

- **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 public consultation occurred but fails to provide evidence of pre-consultation co-design and stress-testing directly with land managers.

Diagnostic Maturity Score: 19.3 / 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 provided assessment criteria sum to 128. To fulfil the requirement of generating a total score out of 100, the total calculated points (24.75) have been normalized against 128.)

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	1	2.25
6. Governance & conflict-resolution	6	0	0.00
7. Legal robustness (HRA/SEA)	7	0	0.00

Category	Weight	Maturity Level (0-4)	Calculated Score
8. Wildfire risk	8	0	0.00
9. Fuel-load management	5	0	0.00
10. Operational infrastructure	5	1	1.25
11. Heather moorland management	6	1	1.50
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	2	2.00
16. Property rights & consents	4	0	0.00
17. Animal welfare	4	0	0.00
18. Water management beyond peat	4	2	2.00
19. Biosecurity & invasive species	4	0	0.00
20. Data transparency & mapping	5	1	1.25

Category	Weight	Maturity Level (0-4)	Calculated Score
21. Enforcement & compliance	4	0	0.00
22. Cumulative burden / interaction	4	1	1.00
23. Communications & accountability	4	2	2.00
24. Species management realism	5	1	1.25

Required Fixes

To achieve consultation-ready status (Gateway Pass), the following actions are strictly necessary:

- **Establish Boundaries:** Explicitly define the plan's status and insert safeguards against policy creep.

- **Draft an Operational Companion:** Create a plain-English guide indicating specific implications, voluntary actions, and funding routes for land managers.

- **Introduce a Risk Matrix:** Connect the identified pressures directly to actionable measures, assigning precise ownership and monitoring strategies.

- **Outline Delivery Mechanisms:** Clarify who is responsible for delivery outcomes, the required sequencing, and long-term liabilities.

- **Integrate Wildfire Strategy:** Implement a credible, operational section regarding wildfire as a core risk, including details on access, water, and maintenance.

- **Include Legal Screenings:** Publish and easily signpost HRA/SEA screening materials and assumptions.

- **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.

- **Address Property Rights and Consents:** Explicitly detail how the plan's objectives rely on landowner and tenant consents, offering feasible routes to secure agreements.

- **Define Enforcement and Compliance:** For areas where restrictions might apply, outline enforceability and who bears the funding burden to prevent displacing liability onto land managers.

- **Establish Conflict-Resolution Models:** Introduce a formal, standing mechanism for resolving priority conflicts, complete with documented escalation triggers.