Moorland Association Assessment of the Nidderdale National Landscape Management Plan

Red Flag Scan Summary

Red Flag Phrase / Pattern	Location	Why It Matters (Risk)	Affects
"Support / Promote" without mechanism	Living & Working (LW-1, LW-2)	Aspirational text cannot be implemented or monitored.	G2; C4; C19
"Partners will…" with no named lead	Delivery Section	Creates diffuse responsibility where multiple "Proposed delivery organisations" are listed, meaning nobody owns the obligation.	G4; C5; C6
Wildfire treated as a footnote	Landscape Challenges (Climate Change)	Misses a strategic climate and public safety risk by noting it without providing operational details.	G5; C8
"Peatland restoration" used as umbrella	Nature Recovery (NR-2)	Erases heather moorland management realities and trade-offs.	C11

Gateway Test Result: FAIL (Not consultation-ready)

The draft fails to meet the minimum consultation-ready requirements. While it identifies key pressures and includes evidence of early stakeholder engagement, fundamental gaps in operational realism and legal signposting must be addressed.

- **G1. Status, scope and "no policy-creep" safeguards: FAIL**. The document defines its high-level strategy but lacks the explicit "no new presumptions / no new tests" safeguard required to prevent policy creep.

- **G2. Risk-to-Action Traceability: PASS**. The draft successfully links identified environmental and economic pressures to specific objectives (e.g., CC-1 to LA-6).

- **G3. Legal robustness and signposting (HRA/SEA): FAIL**. The draft contains no mention of Habitats Regulations Assessment (HRA) or Strategic Environmental Assessment (SEA) screening outcomes.

- **G4. Delivery realism: FAIL**. The plan lists multiple "Proposed delivery organisations" per objective but explicitly defers assigning actual contributions and timelines to a future "action-planning process". It lacks funding realism and maintenance ownership.

- **G5. Wildfire operational reality: FAIL**. Wildfire is mentioned as a risk , but the plan commits to no operationally credible measures for fuel management, access, or water points.

- **G6. Plain English "What this means for land managers": FAIL**. There is no companion summary explaining implications, separating voluntary versus statutory expectations, or identifying funding routes.

- **G7. Co-design evidence: PASS**. The draft outlines an autumn 2024 stakeholder workshop involving farmers, landowners, and gamekeepers.

Diagnostic Maturity Score: 33.75 / 100

Because the Gateway Test failed, this score is diagnostic. A score below 60 indicates material weaknesses likely to generate avoidable conflict and churn.

Category	Wt.	Maturity Level (0-4)	Weighted Score
1. Status, scope & safeguards	8	1 (Mentioned)	2.0
2. Co-design before consultation	6	2 (Defined)	3.0
3. Plain English companion	5	0 (Absent)	0.0
4. Risk-to-Action Traceability	7	2 (Defined)	3.5
5. Delivery model & funding	9	1 (Mentioned)	2.25
6. Governance & conflict-resolution	6	0 (Absent)	0.0

Category	Wt.	Maturity Level (0-4)	Weighted Score
7. Legal robustness (HRA/SEA)	7	0 (Absent)	0.0
8. Wildfire risk & resilience	8	1 (Mentioned)	2.0
9. Fuel-load management	5	0 (Absent)	0.0
10. Operational infrastructure	5	0 (Absent)	0.0
11. Heather moorland management	6	1 (Mentioned)	1.5
12. Gamekeepers explicitly recognised	4	2 (Defined)	2.0
13. Rural business viability	5	2 (Defined)	2.5
14. Working people, skills & capacity	5	2 (Defined)	2.5
15. Cultural living heritage baseline	4	3 (Implementable)	3.0
16. Property rights & consents	4	0 (Absent)	0.0
17. Animal welfare & livestock	4	0 (Absent)	0.0
18. Water management beyond peat	4	2 (Defined)	2.0
19. Biosecurity & invasive species	4	2 (Defined)	2.0

Category	Wt.	Maturity Level (0-4)	Weighted Score
20. Data transparency & mapping	5	1 (Mentioned)	1.25
21. Enforcement & compliance	4	0 (Absent)	0.0
22. Cumulative burden / other plans	4	2 (Defined)	2.0
23. Comms & accountability	4	1 (Mentioned)	1.0
24. Species management & conflict	5	1 (Mentioned)	1.25
Total Diagnostic Score	**100**		**33.75 / 100**

Required Fixes

To make this draft consultation-ready, the authors must implement the following:

1. **Draft a Companion Summary:** Produce a plain English "What this means for you" guide that translates the plan for land managers, explicitly stating what is voluntary versus expected.

2. **Assign Delivery Leads:** Replace lists of "proposed delivery organisations" with explicitly named leads for each measure to prevent ownerless obligations.

3. **Integrate HRA/SEA Signposting:** Make screening and assessment outcomes clear and easy to find, stating pathways and assumptions openly.

4. **Embed Wildfire Operations:** Move wildfire from a mere climate observation to an actionable, operationally credible framework addressing fuel loads, access, and water.

5. **Insert Safeguards:** Add a prominent "no new presumptions / no new tests" clause to prevent the strategy from being misinterpreted as quasi-policy.

Priority Improvements

Beyond the Gateway fixes, the draft scored lowest (0 or 1) in several crucial operational categories that will immediately trigger friction during consultation:

- **Heather Moorland Management (Cat 11):** The draft groups action under "peatland" without a dedicated section on heather moorland management. It must include specific spatial approaches and adaptive triggers for lawful tools like grazing, cutting, or burning.

- **Operational Infrastructure (Cat 10):** The plan is silent on essential access infrastructure. It needs an enabling compatibility statement for tracks, turning points, and drainage maintenance.

- **Property Rights & Consents (Cat 16):** The draft fails to acknowledge that delivery depends on landowner, tenant, or common rights consents. This must be added to ensure practical feasibility.

- **Governance & Conflict Resolution (Cat 6):** The draft lacks a standing mechanism for resolving conflicts between objectives (e.g., access vs. nature recovery). A published review cycle and escalation route are required.