

Moorland Association Assessment of the Peak District National Park Management Plan 2023-28

Red Flag Scan Summary

Red Flag Phrase / Pattern	Location	Why it matters (Risk)	Usually Affects
"Encourage and enable..."	Delivery Plan (e.g., CC.3, CC.8, CC.9, CC.10, CC.11)	Aspirational text without defined delivery mechanisms cannot be properly implemented or monitored.	G2; C4; C19
"As funding allows" / "subject to funding"	WP.1, WP.6, WP.11, WP.12	Signals a wish-list rather than a viable plan, undermining delivery realism.	G4; C5
"Develop and agree a strategic approach to... uncontrolled fires"	CC.15	Defers operational realities; an agreement to create a strategy is not an implementable wildfire risk measure.	G5; C8-C10
"Improving the condition of uplands... re-wetting of moorlands"	CC.8	Risks erasing heather moorland management realities and lawful management tools by using blanket terminology.	C11

Gateway Test: **PASS / FAIL**

Overall Result: FAIL (Not consultation-ready)

The draft fails six of the seven Gateway criteria, indicating fundamental readiness issues that must be addressed before meaningful consultation can occur.

- **G1. Status, scope and "no policy-creep" safeguards: FAIL.** The document claims to be an "essential strategic document" and states "no major decisions... should be taken without reference to it". However, it lacks explicit "no new presumptions / no new tests" safeguards to protect against policy drift.

- **G2. Risk-to-Action Traceability: PASS.** High-level risks (climate change, biodiversity) are traceable to distinct objectives and a Delivery Plan that lists actions and critical success factors.
- **G3. Legal robustness and signposting: FAIL.** The draft lacks any summary or signposting for Habitats Regulations Assessment (HRA) or Strategic Environmental Assessment (SEA) screening outcomes .
- **G4. Delivery realism: FAIL.** Core actions are heavily caveated with "as funding allows", leaving commitments ownerless or unresourced.
- **G5. Wildfire operational reality: FAIL.** Wildfire is identified as a risk, but the only action is to "develop and agree a strategic approach" by 2024. It lacks operationally credible measures for fuel, access, or water points.
- **G6. Plain English "What this means for land managers": FAIL.** There is no companion summary translating what is voluntary, what is statutory, and where funding support exists for operators .
- **G7. Co-design evidence: FAIL.** While the plan states an understanding was reached "with partners and parishes", it lacks evidence of meaningful pre-consultation co-design specifically with farmers, gamekeepers, or land managers.

Diagnostic Maturity Score: 35/100

Because the Gateway Test was failed, this score is strictly **diagnostic** to help prioritize improvements.

Category	Level (0-4)	Weight	Weighted Score
1. Status, scope & safeguards	1	8	2.0
2. Co-design before consultation	1	6	1.5
3. Plain English companion	0	5	0.0
4. Risk-to-Action Traceability	2	7	3.5
5. Delivery model & funding realism	2	9	4.5

Category	Level (0-4)	Weight	Weighted Score
6. Governance & conflict-resolution	1	6	1.5
7. Legal robustness (HRA/SEA)	0	7	0.0
8. Wildfire risk & operations	1	8	2.0
9. Fuel-load management planning	0	5	0.0
10. Operational infrastructure	1	5	1.25
11. Heather moorland management	1	6	1.5
12. Gamekeepers explicitly recognised	2	4	2.0
13. Rural business viability	2	5	2.5
14. Working people, skills & capacity	1	5	1.25
15. Cultural living heritage baseline	3	4	3.0
16. Property rights & consents	1	4	1.0
17. Animal welfare / livestock	0	4	0.0
18. Water management beyond peat	2	4	2.0

Category	Level (0-4)	Weight	Weighted Score
19. Biosecurity / invasive species	1	4	1.0
20. Data transparency & mapping	1	5	1.25
21. Enforcement & compliance	0	4	0.0
22. Cumulative burden / other plans	2	4	2.0
23. Communications / accountability	1	4	1.0
24. Species management conflict	0	5	0.0
Total Diagnostic Score			34.75 / 100

(Note: Category 12 scores a 2 because the National Game Keepers Organisation is explicitly recognized as a key delivery partner for fire mitigation. Category 15 scores well as the plan robustly defines the uplands as a "lived-in landscape that has been shaped by people for thousands of years".)

Required Fixes

To pass the Gateway Test and become consultation-ready, the plan's authors must:

1. **Define Boundaries:** Add an explicit safeguard stating that the management plan introduces no new legal tests or presumptions against lawful land management.
2. **Add Legal Clarity:** Include plain-language summaries of HRA/SEA screenings, outlining pathways and assumptions.
3. **Establish Resourcing Baselines:** Replace open-ended "as funding allows" caveats with credible delivery timelines, stating what is deferred if external funding is not secured.
4. **Integrate Wildfire Operations:** Move beyond a promise to write a future fire strategy. Add operational commitments for fuel continuity, water access, and emergency infrastructure.

5. **Draft a Companion Guide:** Create a short, plain-English summary specifically for land managers outlining expectations versus voluntary actions.
6. **Document Co-Design:** Append a log demonstrating how the plan was shaped by direct, early engagement with those expected to deliver it on the ground.

Priority Improvements

Based on the maturity assessment, the lowest-scoring areas that require targeted strengthening are:

- **Animal Welfare & Species Conflict (Scores: 0):** The draft fails to acknowledge livestock welfare impacts related to management changes or recreation (e.g., dog pressure) and completely ignores species management trade-offs (predator-prey dynamics).
- **Fuel-Load Management (Score: 0):** The lack of mapped zones or practical maintenance regimes for fuel load severely undermines the National Park's climate and biodiversity resilience goals.
- **Enforcement (Score: 0):** While the plan aims to change visitor behaviours and reduce impacts on nature, it lacks any detail on how restrictions will be enforced, who pays for enforcement, or how to avoid displacing the burden onto land managers.