

# Moorland Association Assessment of the North Pennines National Landscape Management Plan (2026-2031)

## Red Flag Scan Summary

Phrase / Pattern	Section / Page	Risk	Affects
"There should be no new tracks constructed on deep peat"	Measure NR1s	Implies presumption against essential ops/safety	C10
"End rotational burning and rotational cutting of heather..."	Measure NR1g	Erases heather moorland management realities; default negative framing	C11; C15
Diffuse ownership (e.g., assigning measures broadly to "Farmers & land managers, Conservation bodies...")	Throughout Measures (e.g., NR1-NR7)	Diffuse responsibility; nobody owns the obligation; unfunded commitments	G4; C5; C6
"Manage risks associated with wildfire..." without operational metrics	Measure NR1h	Unimplementable; misses operational detail (fuel, access, water)	G5; C8- C10
"Assessed at project level" (implied via missing HRA/SEA screening)	Entire Document	Looks unsupported; invites legal challenge and uncertainty	G3; C7
Missing Plain English Summary	Front Matter	Operators can't interpret implications; churn increases	G6; C3
Lack of pre-consultation co-design evidence	Front Matter	Consultation used as first engagement; increases churn	G7; C2

## Gateway Test Result: FAIL (Not consultation-ready)

- **G1 (Status/scope): FAIL.** The draft introduces blanket presumptions against infrastructure (e.g., track construction) without explicit "no new tests/presumptions" safeguards.
- **G3 (Legal robustness): FAIL.** HRA/SEA screening outcomes and assumptions are not transparently summarised or easy to locate in the draft.
- **G4 (Delivery realism): FAIL.** Responsibility is diffuse across sectors (e.g., "Farmers & land managers, Conservation bodies") rather than identifying specific named leads, funding streams, and liabilities.
- **G5 (Wildfire operational reality): FAIL.** While wildfire is mentioned as a risk, the draft lacks operationally credible measures for fuel continuity, emergency access, and water points.
- **G6 (Plain English companion): FAIL.** No clear companion summary is provided to explain practical, voluntary, and statutory implications for land managers.
- **G7 (Co-design evidence): FAIL.** There is no evidence presented of meaningful pre-consultation stress-testing or co-design with land managers, graziers, and gamekeepers.

## Diagnostic Maturity Score: 32.5/100

Category	Level (0-4)	Weighted Score
1. Status, scope and safeguards	1	2.0
2. Co-design before consultation	0	0.0
3. Plain English companion	0	0.0
4. Risk-to-Action Traceability	2	3.5
5. Delivery model, funding realism	1	2.25
6. Governance and conflict-resolution	0	0.0
7. Legal robustness (HRA/SEA)	0	0.0

<b>Category</b>	<b>Level (0-4)</b>	<b>Weighted Score</b>
8. Wildfire risk & resilience	1	2.0
9. Fuel-load management planning	0	0.0
10. Operational infrastructure	1	1.25
11. Heather moorland management	2	3.0
12. Gamekeepers explicitly recognised	1	1.0
13. Rural business viability	1	1.25
14. Working people, skills	1	1.25
15. Cultural living heritage	2	2.0
16. Property rights, consents	0	0.0
17. Animal welfare/livestock	1	1.0
18. Water management beyond peat	2	2.0
19. Biosecurity, INNS pathways	2	2.0
20. Data transparency and mapping	2	2.5

Category	Level (0-4)	Weighted Score
21. Enforcement and compliance	0	0.0
22. Cumulative burden / interaction	2	2.0
23. Communications/accountability	1	1.0
24. Species management/conflict	2	2.5
<b>Total</b>		<b>32.5 / 100</b>

## Required Fixes

- **Establish Ownership:** Update all measure tables to replace diffuse sector lists with named lead partners, specific funding routes, sequencing, and monitoring indicators.
- **Remove Blanket Presumptions:** Replace blanket bans (e.g., restricting new tracks on deep peat) with compatibility statements acknowledging that essential access/infrastructure can be permitted with sensible design safeguards.
- **Provide a Land Manager Summary:** Draft and include a "What this means for you" plain English companion that distinguishes between voluntary, expected, and statutory actions, including funding routes.
- **Embed Wildfire Operational Realities:** Introduce concrete, operational wildfire mitigation measures into the text, specifically addressing fuel-load management, access tracks, water points, and maintenance responsibilities.
- **Add Legal Signposting:** Include a plain-language summary of the HRA/SEA screening processes, clarifying pathways, in-combination effects, and what is deferred to project-level assessment.
- **Document Co-Design:** Provide evidence of any pre-consultation stress-testing and co-design undertaken with land managers and gamekeepers, highlighting what changes were made prior to this draft.

## Priority Improvements

Target the lowest-scoring categories (0/4) to drastically improve the draft's viability and operational realism:

- **Governance & Conflict Resolution (Cat 6):** Implement a standing mechanism to resolve conflicts between competing objectives (e.g., woodland expansion vs. wading bird habitats), defining clear escalation routes and evidence rules.
- **Fuel-load Management (Cat 9):** Commit to a mapped fuel-load management plan that details strategic breaks, maintenance regimes, and review triggers.
- **Property Rights & Consents (Cat 16):** Explicitly acknowledge that delivery depends on landowner, tenant, and common rights consents, and outline feasible pathways for securing these agreements for major measures.
- **Enforcement & Proportionality (Cat 21):** Where access, fire, or dog restrictions are proposed, clearly define who enforces them, how they are funded, and ensure the burden does not fall by default onto land managers.