Moorland Association Assessment of the Lake District National Park Partnership Management Plan 2020-2026

Red Flag Scan Summary

Phrase / Drafting Pattern	Location (Section/Page)	Risk	Affects
"Encourage / support / promote" used extensively as primary verbs for actions.	Pages 20, 22, 23, 28 (Strategies 7, 10, 11, etc.)	Aspirational text cannot be implemented, enforced, or monitored effectively.	G2; C4; C19
"Partners to collaborate" / "All Partners to commit" (No named lead)	Page 39 (FFNC.act.1d), Page 46 (STT.act.10)	Diffuse responsibility; nobody explicitly owns the obligation or delivery.	G4; C5; C6
"Seek funding" / "actively identify and seek to secure funding"	Page 34 (VCPE.act.2d), Page 51 (Resourcing the Plan)	Signals a wish-list; invites churn without credible, secured funding baselines.	G4; C5
"Consider whether..." / "Explore how..." used as main actions.	Page 41 (Research priorities), Page 43 (LDfE.act.2)	Avoids concrete decisions; consultation becomes circular and theoretical.	G4; C4-C6
"Assessed at project level" / "The Appropriate Assessment will assess..."	Page 52 (Delivering actions and projects)	Blanket deferral conceals strategic risks and creates uncertainty for land managers.	G3; C7

Gateway Test Result: FAIL (Not consultation-ready)

- **G1. Status, scope and "no policy-creep" safeguards:** FAIL. The draft operates as a high-level vision without explicitly drawing boundaries between aspiration, guidance, and statutory planning requirements. It lacks a "no new presumptions" safeguard.

- **G2. Risk-to-Action Traceability:** FAIL. Challenges are described broadly (e.g., climate change, nature recovery), but actions are grouped by theme rather than traced to specific pressures with clear metrics and owners.

- **G3. Legal robustness and signposting (HRA/SEA):** FAIL. HRA pathways are deferred entirely to the project level (Page 52) rather than providing transparent screening summaries and assumptions within the draft.

- **G4. Delivery realism:** FAIL. The draft relies heavily on "seeking funding" and diffuse partner responsibilities ("Partners will") without detailing delivery architecture, specific maintenance liabilities, or sequencing.

- **G5. Wildfire operational reality:** FAIL. Wildfire is omitted as a strategic priority (only mentioned once in Annex 8). No operationally credible measures for fuel management, access, or water points are provided.

- **G6. Plain English companion:** FAIL. There is no accompanying land-manager summary separating voluntary initiatives from statutory requirements.

- **G7. Co-design evidence:** FAIL. While the draft notes engagement with ~100 farmers (Page 117), it lacks a change log or evidence showing how land-manager feedback shaped the strategic choices prior to consultation.

Diagnostic Maturity Score: 31/100

(Note: Category 18 "Peatland Restoration Umbrella" is marked N/A as the plan appropriately balances multiple habitats without making peatland a blanket umbrella for all moorland activity. Weights are rebased evenly across the remaining 23 categories to sum to 100. Category Weight = 4.35)

Category	Maturity (0-4)	Weighted Score
1. Status, scope & safeguards	1	1.09
2. Co-design before consultation	2	2.17
3. Plain English companion	0	0.00
4. Risk-to-Action Traceability	1	1.09
5. Delivery model & funding	1	1.09

Category	Maturity (0-4)	Weighted Score
6. Governance & conflict	1	1.09
7. Legal robustness (HRA/SEA)	1	1.09
8. Wildfire risk & resilience	0	0.00
9. Fuel-load management	0	0.00
10. Operational infrastructure	1	1.09
11. Heather moorland mgt	1	1.09
12. Keeper skills & workforce	0	0.00
13. Rural business viability	2	2.17
14. Working people, skills	2	2.17
15. Cultural living heritage	4	4.35
16. Property rights & consents	1	1.09
17. Animal welfare / livestock	2	2.17
18. Peatland restoration umbrella	N/A	N/A

Category	Maturity (0-4)	Weighted Score
19. Adaptive Management	2	2.17
20. Map Pack & Constraints	1	1.09
21. Enforcement & compliance	1	1.09
22. Cumulative burden / plans	2	2.17
23. Comms & local accountability	2	2.17
24. Species management	1	1.09
Total Diagnostic Score		**31.14 / 100**

Required Fixes

To achieve a "PASS" on the Gateway Test and become consultation-ready, the authors must:

1. **Define Status & Scope:** Insert an explicit statement defining the plan's legal weight and confirming it introduces no new policy presumptions for lawful land management.

2. **Establish Traceability & Ownership:** Replace "support/encourage" phrasing with concrete actions linked to named lead partners, specific funding avenues, and measurable KPIs.

3. **Address Wildfire Risk:** Introduce a dedicated strategic response to upland wildfire, including credible operational measures (fuel breaks, access, water points).

4. **Clarify HRA/SEA Pathways:** Summarize legal screening outcomes within the document rather than invoking blanket project-level deferrals.

5. **Produce a Land Manager Companion:** Draft a plain-English summary that explicitly separates voluntary asks, funded opportunities, and statutory requirements for farmers and estate managers.

Priority Improvements

Based on the maturity assessment, efforts should be targeted at the lowest-scoring categories (Maturity 0):

- **Wildfire and Fuel-Load Management (Categories 8 & 9):** Currently absent. The plan must recognise wildfire as a critical climate risk and include mapped, operationally viable fuel-load management commitments.

- **Delivery Details & Plain English (Categories 3 & 5):** The aspiration is high, but the "how" is missing. Authors must move from high-level "Partners will" statements to a defined delivery architecture outlining maintenance, liability, and exact resourcing.

- **Keeper Skills & Workforce (Category 12):** The plan praises cultural heritage but entirely omits the gamekeeping workforce required to deliver upland interventions. The document should explicitly recognise keepers and estate contractors as essential delivery partners.