The Moorland Association

Protecting Moorland Communities from Wildfire: Moorland Association Evidence to the EFRA Committee (DRAFT)

The Moorland Association's (MA) central submission is that wildfire policy must shift from suppressing fires after ignition to reducing their severity before ignition. Climate change is increasing fire weather, but land management determines whether an ignition becomes a controllable surface fire or a landscape-scale emergency. Defra policy should support active fuel management through grazing, cutting, mowing, bracken and scrub control, rewetting where feasible and prescribed winter burning where appropriate. MA members manage around one million acres of upland moorland in England and Wales, including over 700,000 acres of the remaining heather moorland, much of it designated SSSI, SAC or SPA. They also maintain many of the landscapes, tracks, water points, trained staff and equipment on which rural wildfire prevention and response depends. Policy should build on that capacity rather than regulate it out of existence.

The MA asks the Committee to recommend a practical package for England: regional wildfire resilience plans; a dedicated Wildfire Resilience Option within Environmental Land Management and future stewardship schemes; a statutory wildfire monitoring protocol; a Rural Wildfire Response Partnership; an England-wide wildfire warning and prevention campaign; a Wildfire Severity Reduction Duty; and a formal cross-government delivery mechanism led by the existing Fire Minister and Defra.

Question 1: How can land management techniques be best used at a regional level to prevent and control wildfires whilst balancing the needs of different land users? What evidence-gaps are there and how can they be filled?

Wildfire prevention is local, practical and fuel-led. Regional plans should start by mapping continuous fuels, steep slopes, peat soils, access points, visitor pressure, rural-urban interface, water supplies, critical infrastructure and likely ignition sources. Each region should then agree a practical fuel-management plan with land managers, Fire and Rescue Services, Local Resilience Forums, National Parks, Natural England, water companies and local authorities.

Regional wildfire plans should use a toolbox rather than a blanket preference for one technique. On heather moorland and other fire-prone semi-natural habitats, that toolbox should include prescribed burning, cutting and mowing where terrain and ecology allow, grazing to reduce biomass, rewetting where hydrologically feasible, and bracken, gorse, molinia grass and scrub control where these increase fuel continuity. Different tools suit different sites; the policy error is to remove options before assessing local fire risk.

Where prescribed burning is used, it should be undertaken by trained operators, in suitable weather, within agreed plans and with appropriate equipment, notifications and safeguards.

Defra should move from a restrictive, centrally imposed model to regional wildfire resilience plans, with accredited land-manager training, proportionate permissions, a fast licensing route for public-safety fuel reduction, and outcome monitoring.

Question 2: What role do nature-based solutions, such as improving biodiversity and more resilient landscapes, have in the prevention and control of wildfires?

Nature-based solutions should be judged by whether they create resilient landscapes, not by whether they exclude traditional management. In the uplands, biodiversity and wildfire resilience are linked through vegetation structure. A varied mosaic of heather ages, wet flushes, grass, moss, grazed areas and managed firebreaks is both more ecologically diverse and less likely to carry a single high-intensity fire across a whole moor.

This matters because heather moorland is itself a conservation landscape sustained by active management, much of it designated SSSI, SAC or SPA.

Defra should adopt a nature-based wildfire resilience standard for uplands. This should require every restoration or agri-environment plan to show how it will reduce wildfire severity as well as improve habitat condition. Plans should be judged not by whether they exclude burning, grazing or game management, but by whether they deliver measurable outcomes: lower fuel continuity, restored hydrology where feasible, peat protection, diverse vegetation structure, thriving ground-nesting birds, maintained access for fire response and lower probability of high-intensity wildfire.

Question 3: How best can Defra funding schemes be used to support land managers to adapt to the increased risk of wildfires?

Defra funding schemes should treat wildfire resilience as a core environmental public good, paying for outcomes rather than rigid habitat prescriptions. ELM and future stewardship schemes should support the locally appropriate mix of grazing, cutting, mowing, bracken and scrub control, prescribed burning, firebreaks, access routes, water points and fuel-load monitoring. Schemes should avoid incentivising passive fuel accumulation or destocking below fire-safe levels. Every publicly funded peatland or nature-recovery project should include a wildfire risk assessment, fuel-load plan and emergency access plan.

Funding should also recognise that wildfire resilience depends on viable land-management businesses, not one-off capital works.

Defra should create a dedicated Wildfire Resilience Option within ELM and other schemes, paying land managers for audited reductions in fuel continuity, trained staff, maintained firebreaks, accessible water supplies and joint plans with Fire and Rescue Services.

Question 4: What impact does the monitoring of wildfires have on our understanding of the causes and risks of these events in the UK, and how can this be improved? Are there international examples or best practices that can be used in a UK context?

Monitoring determines how the government understands wildfire causes, risks and policy priorities. If wildfire data are incomplete, inconsistent or wrongly interpreted, government will misunderstand causes, underestimate risk and design policies that may make fires worse.

The UK still lacks a single consistently applied wildfire definition, which makes it harder to compare incidents, understand trends, record impacts and plan investment. The CCRA3 wildfire report uses the UK definition of wildfire as "any uncontrolled vegetation fire which requires a decision, or action, regarding suppression", but also notes that the UK context is unusual because vegetation fires can include woodland, grassland, shrubland, peat smouldering fires and fires in built-up areas with vegetation and gardens. We support a clear national definition, aligned with Fire and Rescue Service recording, land-management risk planning and satellite burnt-area data.

Monitoring must distinguish between ignition, spread and severity. Too much debate focuses on what started a fire, while too little attention is paid to why it became severe. Most ignitions are human, whether accidental or deliberate, but the policy-relevant question is often: why did the fire spread, why was it hard to suppress, and why did it burn into peat or threaten homes? That requires data on fuel load, vegetation age, fuel continuity, moisture, slope, wind, access, water supply, previous management and suppression decisions.

Monitoring should capture damage and cost, not just hectares burnt, including smoke exposure, carbon loss, peat involvement, water-company costs, agricultural losses, infrastructure disruption, biodiversity impacts and post-fire erosion.

England needs a statutory wildfire monitoring protocol linking Fire and Rescue incident data, satellite burnt-area mapping, fuel-load surveys, land-manager records, health data, post-fire environmental assessments and operational risk maps.

Question 5: What resources and training do emergency services and local authorities need to respond to the increasing number of wildfires, particularly in rural and hard-to-reach areas?

The Fire and Rescue Service cannot be expected to suppress severe rural wildfires alone. In remote upland areas, the earliest effective response often depends on the people already on the land: gamekeepers, shepherds, farmers, estate staff, contractors and local volunteers with the vehicles, water bowsers, radios, tracks, gate access, local knowledge and practical fire experience needed to reach a fire quickly.

This capacity already exists. It is maintained year-round by active moorland management and is often paid for privately by estates, farms and rural businesses. If policy makes that management uneconomic or impractical, it will also weaken the local workforce and equipment base on which remote wildfire response depends.

Any loss of gamekeeper and farmworker capacity would therefore be a wildfire resilience issue, not only a rural employment issue. If that workforce is reduced, Fire and Rescue Services will lose local intelligence, early detection, practical access, privately maintained equipment and experienced support during incidents.

That practical capability is also maintained through controlled winter burning. These burns are not only a vegetation-management tool; they are where many gamekeepers and estate staff learn fire behaviour, safe ignition, suppression, communications, equipment use and team coordination in controlled conditions. The dramatic reduction in controlled burning on English moors following recent Defra policy changes risks eroding the very skills and confidence that Fire and Rescue Services rely on during wildfire incidents.

Fire and Rescue Services need dedicated wildfire capability, not merely general fire cover. The CCRA3 wildfire report warned that wildfire risk is not consistently reflected in Fire and Rescue Authority planning, and that where wildfire is not included in Integrated Risk Management Plans, services may lack wildfire-specific PPE and specialist training. It also noted that only a small proportion of services had made special provision for wildfire or climate-change-induced wildfire.

The first requirement is therefore mandatory wildfire risk planning in every Fire and Rescue Authority, particularly those covering uplands, heathlands, forests, national parks, water catchments and rural-urban interfaces. These plans should identify local fuel loads, access routes, water sources, high-risk visitor areas, vulnerable communities, critical infrastructure and local land managers who can assist.

Firefighters need specialist wildfire training in fire behaviour, fuels, wind, slope, smoke, peat fires, rural access, direct and indirect attack, water relays, tactical burning, multi-agency command and safe withdrawal thresholds. They also need wildfire-specific PPE, welfare support, off-road vehicles, portable pumps, water bowsers, drones, thermal imaging, hand tools and resilient communications. Public policy should integrate existing rural capability safely, not displace it.

Protocols should settle in advance how private equipment, local access, tactical burning, liability, insurance, fireground entry, communications and post-fire recovery will be handled, so land managers can assist Fire and Rescue Services without legal uncertainty during an incident.

Local authorities need prevention capacity, not just response capacity. They should work with land managers on access management, signage, temporary closures during extreme fire weather, barbecue and campfire enforcement, public communications, parking controls, visitor education and rapid reporting. Fire prevention in high-risk rural landscapes is not a communications campaign alone; it requires local intelligence and visible management on the ground.

Defra and MHCLG should jointly fund a Rural Wildfire Response Partnership. It should provide practical training, specialist equipment, national mutual-aid standards, local wildfire plans, and accredited arrangements for gamekeepers, farmers, shepherds and estate staff to work safely with Fire and Rescue Services. The model should be

prevention-led: reduce fuels before ignition, train together before the emergency, and use local knowledge before a fire becomes uncontrollable.

Question 6: What are the most effective activities for tackling the human causes of wildfire ignition, for example public engagement and campaigns? How can the UK Government best support the delivery of these activities at both a local and national scale?

Public campaigns are necessary, but they are not sufficient. Since the Committee's call for evidence recognises that almost all UK wildfires are caused by human action, whether accidental or deliberate, reducing risky behaviour must be central to wildfire policy.

Human ignition is not only a communications problem; it is a land-use and access-management problem. Public engagement must be tied to live fire-risk conditions, local fuel risk, visitor pressure and enforcement.

The government should support a single, recognisable national wildfire warning system, linked to the Met Office fire-risk products and used consistently by government, fire services, local authorities, land managers, national parks and broadcasters. The 2021 Wildfire Framework already gives the Met Office and Natural Hazards Partnership responsibility for risk-monitoring products, including the Fire Severity Index and Daily Hazard Assessment, and previously gave central government and Defra roles in proactive public communications; those functions should now be reflected in a public-facing system led through MHCLG, Defra and the Met Office.

Messaging should be specific and behavioural: no barbecues, campfires, discarded cigarettes, fireworks, parking on dry grass or spark-generating machinery during high-risk conditions. It should be delivered at the point of risk, including car parks, access tracks, visitor centres, weather apps, road signs, campsites and local media.

The government should support local byelaws and enforcement. Local authorities, national parks and landowners need practical powers to restrict barbecues, campfires and fireworks during periods of high fire risk; close or divert access temporarily in extreme conditions; manage parking; and remove abandoned ignition sources. Public engagement works best when it is backed by visible enforcement and clear consequences.

During extreme fire-risk periods, temporary access restrictions or diversions should be available where necessary, proportionate and clearly communicated.

The government should not treat land managers merely as recipients of warnings; they are part of the warning and prevention system. Defra should fund and formally integrate local land-manager patrols during high-risk periods, particularly around bank holidays, school holidays and dry spring weekends. This could be done through Local Resilience Forums, national park authorities and regional wildfire groups.

The government should fund fire investigation and data collection. The UK needs to know which behaviours are causing ignitions, where, and under what conditions. Without better ignition intelligence, public campaigns are guesswork. If disposable barbecues are the main problem in one area, arson in another and roadside cigarettes in another, the interventions should differ.

The UK Government should establish a National Wildfire Prevention Campaign combining a single warning system, clear behavioural rules, enforceable restrictions, ignition investigation and rapid public alerts during extreme fire weather.

Question 7: What policies are in place, or are needed, to reduce the severity of wildfires and their socio-economic impacts on both agricultural land and at rural-urban boundaries?

Existing policy recognises wildfire as a growing risk, but does not yet control the severity of that risk. The missing policy is a duty to assess whether land-use decisions increase or reduce fuel continuity, fire intensity, peat ignition risk, smoke exposure, agricultural loss and danger to homes at the rural-urban interface.

For agricultural land, the policy need is a funded wildfire resilience package for farms and estates. This should include support for grazing, cutting, mowing, prescribed burning, bracken and scrub control, firebreaks, access tracks, water points, machinery-risk protocols during harvest and rapid reporting systems.

On moorland, policy should recognise that excluding traditional management can increase risk where it allows fuel to accumulate. Rewetting should be supported where it works, but it cannot be the only policy. Severe fires that burn into peat release carbon, damage biodiversity, harm water quality and create long-term restoration costs. The CCRA3 report records that the Saddleworth Moor wildfire burned for over three weeks, affected over 18 km², consumed vegetation and organic soil, and emitted an estimated 36,720 tonnes of carbon, mostly from long-term losses from peaty soils.

At rural-urban boundaries, planning policy should require wildfire to be treated as a land-use risk, with defensible space, managed vegetation buffers, emergency access, water supplies, evacuation routes and long-term maintenance plans. A rural-urban interface fuel standard should prevent continuous unmanaged fuel from running directly into homes, roads, substations and other infrastructure.

The MA seeks a fast, risk-based licensing route for fuel-reduction work where land managers, Fire and Rescue Services or Local Resilience Forums identify a public-safety risk. Applications should be time-limited, locally informed and subject to a clear appeal route. Public-safety fuel reduction should be treated as urgent risk management, not trapped in multi-year restoration negotiations.

This would not remove environmental safeguards; it would require wildfire risk, firefighter safety and smoke impacts to be weighed alongside habitat objectives before dangerous fuel loads accumulate.

Farms, estates and rural businesses also need support for business-continuity planning and post-fire recovery, including soil stabilisation, reseeding, fencing, water protection and habitat recovery.

The government should introduce a Wildfire Severity Reduction Duty across Defra, MHCLG, Cabinet Office, local authorities, Natural England and relevant public landowners. This duty should require policy decisions to assess whether they increase or reduce fuel loads, fire intensity, firefighter risk, smoke exposure, peat ignition, agricultural loss and risk to homes at the rural-urban interface.

Question 8: Given that responsibility is spread across government departments and bodies, for example Defra, Forestry Commission and MHCLG, how should the government coordinate a cross-departmental approach to tackle the increasing risk of wildfires?

England does not need another loose forum or another statement of concern. It needs a single, accountable wildfire governance structure that joins prevention, land management, emergency response, public health, carbon protection and recovery.

The 2021 Wildfire Framework for England already recognises the problem. It states that wildfire is an increasing threat across England, that a coordinated approach is essential, and that the framework is intended to clarify responsibilities and support a more integrated multi-sector approach. It identifies the Home Office [now MHCLG], Defra, Cabinet Office, Fire and Rescue Services, England and Wales Wildfire Forum, Regional Fire Groups, Local Resilience Forums, the Met Office and, potentially, UKHSA as key stakeholders.

That division is logical on paper, but in practice it creates gaps. The department responsible for fire response does not control land management. The department responsible for land management does not command Fire and Rescue Services. Natural England can shape land-management decisions but has no direct statutory responsibility for wildfire response. Local Resilience Forums may include Forestry Commission, Natural England and National Parks, but inclusion is not the same as accountable delivery.

Natural England advice and consents affecting vegetation management should therefore be subject to the same wildfire test as Defra policy.

MHCLG is already the lead government department for wildfire. The existing Fire Minister should therefore remain the national ministerial lead, but this role needs a formal cross-government delivery mechanism because the principal levers for reducing

wildfire severity sit partly outside MHCLG, especially in Defra land-management policy and Natural England consents.

The government should establish a Wildfire Resilience Board, jointly chaired by the MHCLG Fire Minister and the Defra minister responsible for land management and nature recovery, with an annual report to Parliament. The Board should include MHCLG, Defra, Cabinet Office, Natural England, Forestry Commission, UKHSA, the Met Office, NFCC, EWWF, Local Resilience Forum representation, National Parks, water companies and land-manager bodies.

The Board should produce a statutory Wildfire Strategy and Action Plan for England; apply a wildfire test to land-management policy and Natural England consents; create a national fuel-load and risk-monitoring system; formalise regional wildfire partnerships; and set national standards for wildfire training, equipment, land-manager integration and mutual aid.