



The Moorland Association

Mary Creagh CBE MP
Parliamentary Under-Secretary of State for Nature
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London SW1P 4DF

4 July 2025

Dear Minister,

How happy is the Prime Minister with Natural England?

This is a reply to your letter of the 13 February in which you responded to our letter to the Home Secretary of the 20 January.

I look forward to the meeting you suggested. Pragmatic discussion is key to stopping rural vs urban disputes becoming a dialogue of the deaf.

Ahead of that meeting, this letter explains our concerns. Simply put, the relationship between the countryside and Natural England is dysfunctional. Your skills as a marriage counsellor are needed.

Natural England has already faced fierce criticism. Not least after the Prime Minister singled out the 'bat tunnel' as emblematic of wasteful public expenditure. The agency blamed HS2 for that.[1]
However, there are other matters which will fuel concern in Downing Street.

Natural England vs the G7, the White House and the EU

I start with an issue which last month worried the G7 leaders. It is the prospect of wildfires spilling into cities as occurred in Los Angeles. Even before that disaster, the National Fire Chiefs Council warned that UK wildfires were starting to cross the "rural urban interface".[2]

In their statement on wildfires, the G7 leaders called for the use of "controlled burning" as a means of preventing them "endangering lives, affecting human health, destroying homes and ecosystems, and costing governments and taxpayers billions of dollars".[3]

The previous week saw President Trump issue an executive order to reduce restrictions on "prescribed fires". The White House called this "commonsense wildfire prevention".[4]

The European Commission also believes vegetation management is critical to reducing dangerous fuel loads.[5]

Yet Natural England knows better. It has dramatically reduced both preventative burning and mowing. The resulting build-up of vegetation has been further exacerbated by Natural England reducing sheep and cattle numbers by around a quarter. Less grazing means more fuel load.

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Without fuel there are no fires. With massive increases in vegetation, you get what we have - the worst wildfires in our history. It is as if a petrol station had been built on every hill.

The National Fire Chiefs Council is concerned that the Government approach to wildfires is disjointed. On one side, your department prophetically warned in 2023 that excess vegetation was turning Dartmoor into a “tinderbox”.^[6] On the other, Natural England is currently campaigning for even further restrictions on vegetation management.^[7] Such an extension would be deservedly condemned.

The Saddleworth Moor fire started on land where Natural England had a de facto ban on preventative burning.^[8] The BBC reported that catastrophe caused smoke inhalation for five million people.^[9] The next major wildfire will again harm northern cities - and could be even worse. There may be deaths among those fighting the fire as well as among the public caught up in it. You can judge the political impact of a fatal fire.

There is public impatience with predictable disasters. The Heathrow fire is the latest example of expert warnings being repeatedly ignored before the inevitable calamity. When the next major wildfire occurs, we will be encouraging legal action against Natural England’s directors under Section 36 of the Health and Safety at Work Act 1974. Their negligence is grotesque.

With the stakes so high, I was troubled by the lack of understanding shown by the serious errors in February’s letter. The first concerned RSPB research which the letter said had shown “a 73% reduction in traditional winter burning”. The letter suggested that mowing was an alternative. In fact, the RSPB study said that, in the wake of Natural England’s 2021 regulations, there had been a 73% fall in vegetation being controlled through either mowing or burning.^[10]

This is crucial because Natural England has entangled both forms of prevention in regulatory overload. A land manager first needs to request permission from Natural England to apply for a burning licence over deep peat, before secondly submitting a licence application to Defra. That typically takes a year. Then, if a licence is granted, they have to seek agreement for an accompanying restoration plan from Natural England. This can take a further two years - even on a moor which Natural England has already assessed as ‘recovering’. One of our members has had three plans rejected.

So, when your letter points out that there has been a dearth of applications, it is because of this extraordinarily time-consuming process. Changing the proverbial lightbulb requires inviting Natural England to rewire the house.

Natural England versus science

The second error in the letter is its claim that there is a “strength of collective evidence” behind Natural England’s views on peatland management. The reality is the polar opposite. Most senior scientists disagree profoundly with Natural England’s stance.

The agency has shrivelled into an echo chamber relying for validation on its network of co-believers who shut out serious science that does not fit their preconceptions.

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At the heart of this groupthink is the grandly named “International Union for Conservation of Nature – UK Peatland Programme” which Natural England cites in its policy justifications. It is a club of quite junior people, none of whom has a stellar scientific background.

It publishes ‘papers’ with no named authors and which are not peer-reviewed. However, it is confident in claiming “overwhelming scientific evidence” for its views which it contends are backed by a “consensus amongst peatland scientists”.^[11]

Busy ministers might be impressed. Until they realise how senior scientists have felt compelled to produce a peer-reviewed study pointing out the IUCN group’s hubris.^[12]

Furthermore, academics including Professor James Crabbe of Oxford, Professor Rob Marrs at Liverpool and Dr Andreas Heinemeyer at York have been so concerned that they have warned of “a concerted effort to derail an evidence-based approach”. It meant that policy discussion “about managing heather moorland is neither properly informed nor evidence based.”^[13]

The IUCN group has refused to talk to these academics, despite it receiving substantial public funding. All policies relying on it are built on a house of cards. Or tinder.

Natural England versus Defra

Natural England also sabotages Defra’s success. Perhaps the most remarkable conservation result for your department over the last decade was the recovery in England’s hen harrier population. Ten years ago, the RSPB called for Defra’s intervention because of the desperate situation for this species. And Defra delivered.

RSPB scientists observed an astonishing 1,150 % increase in these endangered birds of prey between 2016 and 2023.^[14] It was the result of an adroit piece of policymaking: a brood management scheme which gave gamekeepers confidence that they would never have so many hen harriers nesting on their moors that it would threaten their jobs.

However, the policy had a fatal flaw. It was not invented in York. Natural England’s headquarters hated Defra’s scheme. Last year it managed to stop brood management taking place. The result? Hen harrier numbers fell 43% in a single year.^[15] As The Times put it, “Environment regulator kills off hen harrier conservation scheme”.^[16]

Natural England is great at breeding jobs for its officials. But not rare birds. With colleagues like this, how is Defra going to meet its obligation under the Environment Act 2021 to halt species declines?

And what about Defra’s commitment to 75% of protected sites reaching favourable status? Natural England manages just one upland National Nature Reserve. Yet a staggering 80% of its SSSI units are in unfavourable condition.^[17] This drains moral authority from Natural England’s peatland policy.

Which leads me to its latest peat map which resulted in The Times headline: “Government’s AI peatland map ridiculed for confusing bog with rock”.^[18]

Beyond the limitations of AI, this saga revealed a human dimension. When an agency has lost the trust of key stakeholders, it retreats into its offices bereft of the wisdom of hands-on experts.

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This undermines efficiency in delivering for nature. The National Audit Office is currently looking at value for money. Ahead of its report, you could ask your officials how much it costs the public purse to get one extra curlew to breed on land managed by the RSPB.

You could also ask them to contrast that with conservation successes which cost Defra nothing: multiple peer-reviewed studies show that endangered birds thrive on privately owned grouse moors.[19] That is because they share in the protection from predators that gamekeepers provide to grouse.

Grouse moors also provide thousands of jobs in the hard-pressed rural economy.

They are where conservation, job creation and social cohesion come together. What we are getting from Natural England is the countryside being scarred and at vast cost to the public purse. If your skills can get the relationship between government and rural communities working, there will be many upsides. I hope to be of service in achieving that.

Yours sincerely,

Andrew Gilruth

Chief Executive

Moorland Association

agilruth@moorlandassociation.org

Attachment

- 1) Moorland Association letter sent to the Home Secretary, January 2025

CC

- 1) Secretary of State for Environment, Food and Rural Affairs, The Rt Hon Steve Reed OBE MP
- 2) Chair of Natural England, Dr Tony Juniper CBE
- 3) Chair of the National Fire Chiefs Council, Mark Hardingham
- 4) Vice Chair of the National Fire Chiefs Council, Phil Garrigan
- 5) Comptroller and Auditor General, National Audit Office, Gareth Davies
- 6) Director General, International Union for Conservation of Nature, Grethel Aguilar
- 7) Chief Executive, International Union for Conservation of Nature UK, Chris Mahon

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- [2] NFCC concerns about fires leaping “rural urban interface”: <https://nfcc.org.uk/nfcc-urges-public-caution-as-amber-wildfire-alert-issued/>
- [3] G7 statement on wildfires: <https://www.pm.gc.ca/en/news/statements/2025/06/17/kananaskis-wildfire-chart>
- [4] White House Executive Order, 12 June 2025: <https://www.whitehouse.gov/presidential-actions/2025/06/empowering-commonsense-wildfire-prevention-and-response/>
- [5] EU encourages grazing to reduce wildfire risks: <https://civil-protection-knowledge-network.europa.eu/stories/value-grazing-wildfire-prevention-tool>
- [6] Dartmoor: Defra report said in December 2023 that excess vegetation had made Dartmoor into a “tinderbox”: <https://www.gov.uk/government/publications/independent-review-of-protected-site-management-on-dartmoor/independent-review-of-protected-site-management-on-dartmoor>
- [7] Natural England plans to further reduce preventative winter burning of vegetation: <https://www.gov.uk/government/news/new-proposals-to-ban-heather-burning-on-peatland-to-protect-air-water-and-wildlife>
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- [9] Saddleworth fire exposed 5 million to dangerous pollution: <https://www.bbc.co.uk/news/uk-england-manchester-52208610> and the pollution included lead and cadmium: “because of extensive toxic fallout from factories a century ago... “There’s 100 years’ of pollution buried along with the peat as it formed,” says [Professor Hugh] Coe.” See New Scientist: <https://www.newscientist.com/article/mg23931853-300-smoke-from-moorland-wildfires-may-hold-toxic-blast-from-the-past/> and the result was 28 premature deaths: “over the 7-day period 28 (95% CI: 14.1-42.1) deaths were brought forward, with a mean daily excess mortality of 3.5 deaths per day”: https://www.researchgate.net/publication/340286590_Impact_on_air_quality_and_health_due_to_the_Saddleworth_Moor_Fire_in_Northern_England
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- [12] Ashby, 2021 examines the flaw in the IUCN’s position statement: <https://link.springer.com/article/10.1007/s13157-021-01400-1>

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- [13] Senior scientists criticising ideological impact on policy making:
<https://www.futurelandscapesforum.com/about-flf>
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- [17] 80% of SSSI units at Natural England’s only upland NNR are in unfavourable condition
<https://magic.defra.gov.uk/>
- [18] Natural England peatland map ridiculed:
<https://www.thetimes.com/uk/environment/article/defra-ai-peatland-map-cq9x80vnp>
- [19] Peer reviewed studies showing endangered ground nesting birds thriving on grouse moors.
<https://www.gwct.org.uk/news/news/2025/june/new-research-shows-rise-in-predators-is-threatening-red-listed-birds-with-extinction/> and
<https://www.gwct.org.uk/research/species/birds/lapwing-and-other-waders/predator-control-and-moorland-birds/>

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20 January 2025

The Rt Hon Yvette Cooper MP
Secretary of State for the Home Department
The Home Office
2 Marsham Street
London
SW1P 4DF

Dear Home Secretary,

England' catastrophic wildfires will be blamed on the Home Office

England's moorlands provide our northern cities with fresh air and landscapes loved for their heather-clad vistas. Yet these treasures will become a national disgrace when massive wildfires sweep through them. This letter explains why these fires will be much worse than the Saddleworth blaze of 2018, threatening urban areas with fumes and flames. As the minister responsible for the coordination of wildfire issues within government, you will be held responsible.] We therefore make a recommendation on what you can do today to avoid our own Los Angeles style tragedy over the coming months.

Huge wildfires are inevitable when vegetation is allowed to grow unchecked. Sooner or later there will be a spark. Add low humidity and strong winds and the horrors of Los Angeles follow. California's politicians had failed to heed the warning from scientists that the risk of high-intensity wildfires was being increased by a *"longstanding policy failure... to counteract the gradual accumulation of flammable organic materials"*.^[2]

American policy was negligent, here it is deliberate

Yet while the Los Angeles tragedy was down to political negligence, here, growing the fuel load of vegetation was the deliberate policy of the previous government. For many years Natural England has been blocking land managers from reducing the fuel load on moorland. The extension of these restrictions in 2021 immediately led to a further 73% reduction in fuel load management through traditional winter burns.^[3] Neither burned nor mowed, the heather, which was already getting too long, has since been increasing year in, year out.

Natural England's 'success', is your problem. Global wildfire experts have said that such is the growth in the fuel load on our moorlands that the intensity of the coming fires will be too great for our Fire and Rescue Service.^[4] This was modelled three years ago in a report instigated by the Peak District National Park.^[5] It showed *"the frightening potential of fire... reaching extremes both in the rate*

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of spread and flame lengths far beyond the capacity of control of the FRS... Little can be done to control the topography of the area or the increasingly fire supportive weather, but fuel loading can be addressed.”

Experts who have studied the dreadful wildfires in Portugal, Greece and Australia say that we too risk these new types of fires with pyroconvection causing flames to leap huge distances as they generate their own, unpredictable and highly dangerous winds.[4]

The flames will only be part of the problem. Since much of the fuel load is accumulating above areas of deep peat, these carbon stores will belch poisonous smoke for months. We consider Natural England's current policy of adding fuel to the coming fires is absurd.

Adding fuel to fires is absurd

Given that the experts are shouting, why has Natural England been so deaf? Partly it is due to its fixation with minutiae instead of major policy concerns. We empathise with your cabinet colleagues' irritation about Natural England's pettiness over bats and newts.[6] In the case of moorland management, it has buried itself in micro-regulating decisions about where and when to remove vegetation through mowing or winter burns and how rewetting moors can help moss grow. These are issues where people working in the hills are much better positioned to understand what nature needs than officials in glass offices - especially since the science is limited.[7]

The driving force behind this micromanagement is ideological antipathy to grouse shooting - something Natural England shares with its soulmates in the RSPB. *The Times* has written about how it “twisted” the science over wildfire risks due to its attempts to stop people game shooting.[8] The ensuing tedious overregulation is designed to make grouse moors uneconomic and replace them with the rewilding religion, which make wildfires worse.[9]

Yet this focus on small things, is distracting policymaking from the big issue of how climate change is rapidly amplifying the wildfire risk in the UK.[10] Relative humidity has dropped sharply since 2000 which is causing plants to dry out faster during hot summers.[11] Equally, UK winters are getting warmer and wetter which fosters vegetation growth.[12] *The Guardian* has explained how in Los Angeles these climate factors added to the fuel load.[13] Here the number of high-risk days for wildfires could quadruple by 2080.[14]

The other overwhelming concern is the harm caused by fires. The Saddleworth disaster in 2018 saw five million people breathe in pollution which included lead and cadmium deposited on the moors during the Industrial Revolution.[15][16] Scientists say dozens died early because of the fumes.[17] There was also the release of huge quantities of carbon from the deep peat catching fire.[18]

Natural England misled ministers

It is disturbing that Natural England has misled ministers by claiming that this fire started at a location where winter burning of heather was taking place.[19] The fire ignited on land where Natural England had a de facto ban – the heather could only be burnt once every 23 years.[20] With the heather growing three inches a year this created such a fuel load that, when the inevitable fires came on both Saddleworth Moor and nearby Winter Hill, the Fire and Rescue Service simply could not cope. Irreparable damage was done to the sub-surface peat, when the purpose of the ban on winter burning had been to prevent such damage.

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That was 2018. Now, with so little of the traditional fuel load reductions and firebreaks created by winter burns, it has become a question of when, not if a megafire erupts – a fire far too big for government to extinguish.[21]

Last year's Parliamentary briefing on wildfires [22] explained that *"older heather burns with greater intensity"* and that to prevent wildfires *"vegetation management must be conducted continuously"*. Not every 23 years.

Also of note is the Scottish Parliament's hearing on the issue where the Scottish Fire & Rescue Service warned that mowing excess vegetation can *"leave a dry layer that actually encourages the spread of fire"* whereas winter burning *"is by far the most effective because it removes a fuel in its entirety"*. [23]

We therefore recommend your government immediately instructs Natural England to make unfettered preventative licences its default position and for Defra to issue them within a week of request.

It is deeply troubling that neither body has a single in-house wildfire expert. This is why they come up with flawed alternatives such as mowing and planting sphagnum moss – the latter often becomes so dry as to serve as tinder for any spark.

It also worries us that the National Trust in Howden and the RSPB at Geltsdale have allowed their moorland vegetation to overgrow to the extent that fires could threaten vast tracts of land around them. When dangerous fuel loads exist in urban areas, fire services feel empowered to intervene. We ask you to make clear through legislation that rural fuel loads must also be reduced to safe levels.

Gamekeepers and farmers are passionately committed to preventing wildfires as it is their land that gets destroyed. And it is their lives put at risk, as they are invariably at the front-line fighting these fires. Unless your government's restrictions on vegetation management are reversed, ministers will have to pray for the wind not to blow towards their constituencies and that no one gets killed in the fire's path.

Yours sincerely

Andrew Gilruth
Chief Executive
Moorland Association

Attachments

- 1) Ignition point of the 2018 Saddleworth Moor wildfire.
- 2) Direction of advance during the 2018 Saddleworth Moor wildfire.

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- 2) Chair of Natural England, Dr Tony Juniper CBE
- 3) Chair of the National Fire Chiefs Council, Mark Hardingham
- 4) Vice Chair of the National Fire Chiefs Council, Phil Garrigan
- 5) Chief Fire Officer of Cleveland Fire & Rescue Service, Peter Rickard
- 6) Chief Fire Officer of County Durham and Darlington Fire & Rescue Service, Steve Helps
- 7) Chief Fire Officer of Northumberland Fire & Rescue Service, Graeme Binning
- 8) Chief Fire Officer of Tyne and Wear Fire & Rescue Service, Peter Heath
- 9) Chief Fire Officer and Chief Executive of Cheshire Fire & Rescue Service, Alex Waller
- 10) Fire Service Lead of Cumbria Fire & Rescue Service, Paul Hancock
- 11) Chief Fire Officer of Lancashire Fire & Rescue Service, Jon Charters
- 12) Chief Fire Officer of Greater Manchester Fire & Rescue Service, Dave Russel
- 13) Chief Fire Officer of Merseyside Fire & Rescue Service, Phil Garrigan OBE
- 14) Chief Fire Officer and Chief Executive of Derbyshire Fire & Rescue Service, Gavin Tomlinson
- 15) Chief Fire Officer of Leicestershire Fire & Rescue Service, Callum Faint
- 16) Chief Fire Officer of Lincolnshire Fire & Rescue Service, Mark Baxter
- 17) Chief Fire Officer of Nottingham Fire & Rescue Service, Craig Parkin
- 18) Chief Fire Officer of Northamptonshire Fire & Rescue Service, Nikki Watson
- 19) Chief Fire Officer of Mid & West Wales Fire & Rescue Service, Roger Thomas
- 20) Chief Fire Officer and Chief Executive of North Wales Fire & Rescue Service, Dawn Docx
- 21) Chief Fire Officer of South Wales Fire & Rescue, Air Vice-Marshal Fin Monahan OBE DFC PhD
- 22) Chief Fire Officer and Chief Executive of Humberside Fire & Rescue Service, Phil Shillito
- 23) Chief Fire Officer of North Yorkshire Fire & Rescue Service, Jonathan Dyson
- 24) Chief Fire Officer and Chief Executive of South Yorkshire Fire & Rescue Service, Chris Kirby
- 25) Chief Fire Officer and Chief Executive of West Yorkshire Fire & Rescue Service, John Roberts
- 26) Chief Fire Officer of Hereford & Worcester Fire & Rescue Service, Jonathan Pryce
- 27) Chief Fire Officer of Shropshire Fire & Rescue Service, Simon Hardiman
- 28) Chief Fire Officer of Staffordshire Fire & Rescue Service, Rob Barber
- 29) Chief Fire Officer of Warwickshire Fire & Rescue Service, Ben Brook
- 30) Deputy Chief Fire Officer of West Midlands Fire & Rescue Service, Simon Barry
- 31) Chair of LGA Safer and Stronger Communities Committee, Cllr Heather Kidd MBE
- 32) Vice Chair of LGA Safer and Stronger Communities Committee, Cllr Tom Hunt
- 33) Principal Policy Advisor to LGA Safer and Stronger Communities Committee, Mark Norris
- 34) Chief Executive of the Yorkshire Dales National Park Authority, David Butterworth
- 35) Chief Executive of the North York Moors National Park Authority, Tom Hind
- 36) Chief Executive of the Peak District National Park Authority, Phil Mulligan
- 37) Chief Executive of the Northumberland National Park Authority, Tony Gates

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- [2] America's policy failure. See *Wildfire Management in the United States: The Evolution of a Policy Failure*: <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1541-1338.2004.00066.x>
- [3] 73% decrease: an RSPB funded study said that there was a 73% reduction in areas being managed by burning or cutting in the immediate aftermath of the Natural England ban on burning imposed under the Burning (England) Regulations 2021. See "Annual extent of prescribed burning on moorland in Great Britain": <https://zslpublications.onlinelibrary.wiley.com/doi/10.1002/rse2.389> NB the model was unable to "fully separate burning from cutting on moorland" meaning that neither method of reducing fuel load was taking place in the 73% of land where excess vegetation was previously being managed.
- [4] Wildfire experts. See presentation by Mark Castellnou, Fire Ecologist University of Lleida (Spain) and fire officer in the Catalan Fire & Rescue Service to the Wildfire Impact, Risk & Mitigation Workshop (18 Jan 2023) chaired by Lord Deben, then chairman of the Climate Change Committee. Pages 25-30: <https://www.gwct.org.uk/media/1381625/GWCT-Wildfire-workshop-report-and-proceedings-web.pdf>
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- [7] The limited science over methods of vegetation management is discussed in "A Critical Review of the IUCN UK Peatland Programme's "Burning and Peatlands" Position Statement": <https://link.springer.com/article/10.1007/s13157-021-01400-1>
- [8] Scientists accuse RSPB of having "twisted" scientific data: <https://www.thetimes.com/article/rspb-twisted-data-in-campaign-against-grouse-shooting-qwhl6wb83>
- [9] Rewilding increases wildfire risk. See page 40, Table 5.1, *Sustaining Ecosystems 2022*: <https://www.gwct.org.uk/media/1319617/Sustaining-ecosystems-English-grouse-moors-LR.pdf>
- [10] Wildfires and climate change. See page 2, Parliamentary Office on Science and Technology briefing on wildfires: <https://researchbriefings.files.parliament.uk/documents/POST-PN-0717/POST-PN-0717.pdf>
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- [12] Met Office predicting 30% wetter winters <https://www.metoffice.gov.uk/weather/climate-change/climate-change-in-the-uk> See also: UK winters getting warmer and wetter: <https://www.carbonbrief.org/analysis-how-uk-winters-are-getting-warmer-and-wetter/>
- [13] LA fires came after wet winters, which had caused "vegetation to sprout" adding "literal fuel to the fire" were followed by drought and low humidity: <https://www.theguardian.com/us-news/2025/jan/08/fire-map-la-palisades-explainer>
- [14] Danger days for UK wildfire risk could quadruple by 2080: See Box 3.1 on page 12 in "The Third UK Climate Change Risk Assessment Technical Report": <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA3-Chapter-3-FINAL.pdf>

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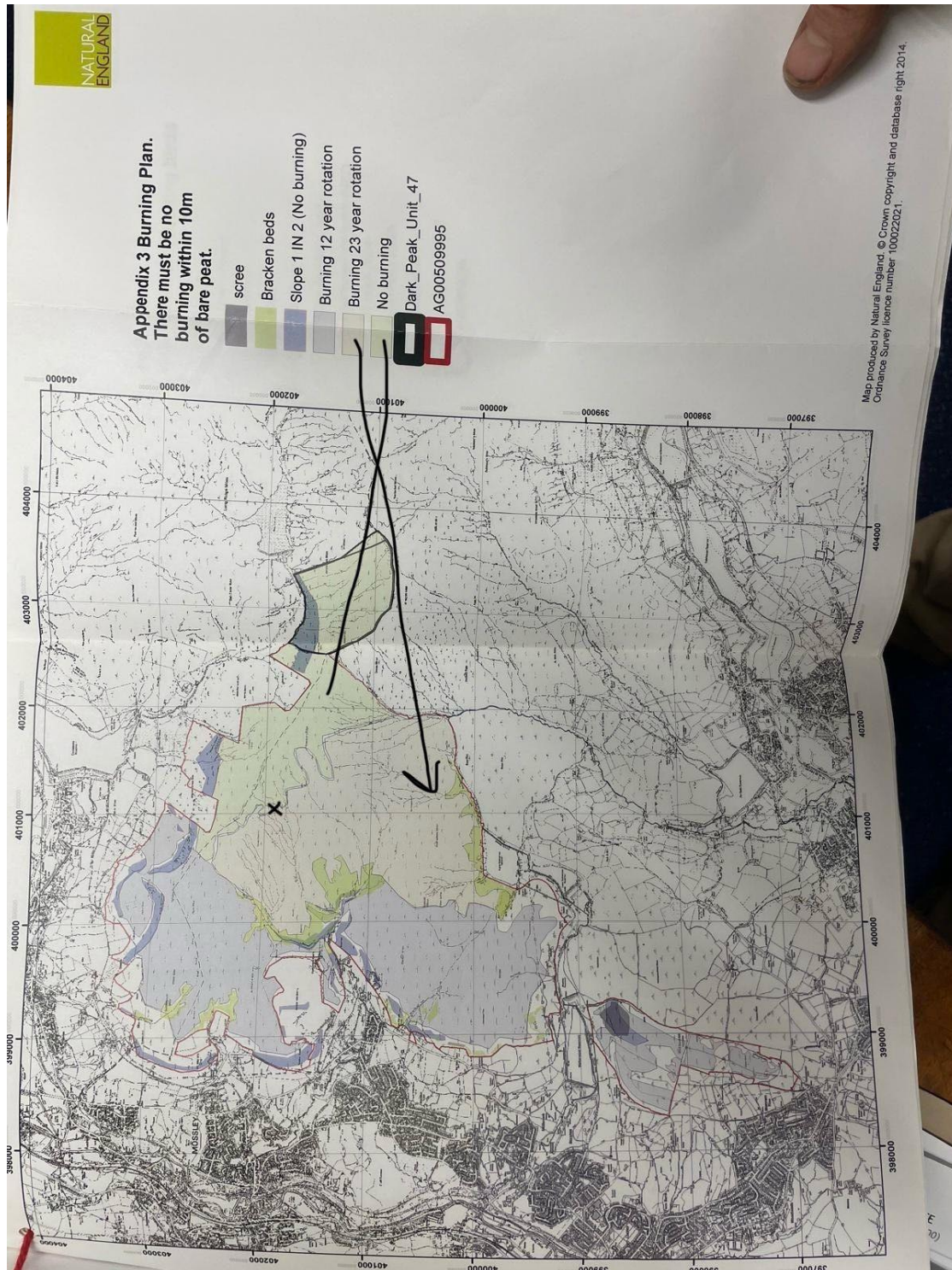
- [15] Saddleworth fire exposed 5 million to dangerous pollution: <https://www.bbc.co.uk/news/uk-england-manchester-52208610>
- [16] Saddleworth pollution included lead and cadmium: “because of extensive toxic fallout from factories a century ago... ‘There’s 100 years’ of pollution buried along with the peat as it formed,” says [Professor Hugh] Coe.” See New Scientist: <https://www.newscientist.com/article/mg23931853-300-smoke-from-moorland-wildfires-may-hold-toxic-blast-from-the-past/>
- [17] 28 premature deaths: “over the 7-day period 28 (95% CI: 14.1-42.1) deaths were brought forward, with a mean daily excess mortality of 3.5 deaths per day”: https://www.researchgate.net/publication/340286590_Impact_on_air_quality_and_health_due_to_the_Saddleworth_Moor_Fire_in_Northern_England
- [18] Carbon released. Centre for Ecology and Hydrology estimated that the 2018 Saddleworth Moor wildfire released half a million tonnes of carbon dioxide into the atmosphere (Martin 2018). Equivalent to yearly CO₂ emissions from over 100,000 cars. See p8: <https://ippr-org.files.svdcdn.com/production/Downloads/nan-valuing-our-northern-uplands.pdf>
- [19] Saddleworth fire blame risk: Natural England claimed that “The majority of the fire (c.800 ha) took place on the Stalybridge Estate which is managed by rotational burning for driven grouse shooting.” See Section 2, Table 8.1 in Appendix 8: <https://publications.naturalengland.org.uk/publication/4741162353295360>
- [20] Natural England say that the Saddleworth fire started at <https://w3w.co/grub.slams.dart> The headkeeper says it started nearby at <https://w3w.co/violinist.circular.speakers> . Both spots are in an area which Natural England only allowed to be burnt once every 23 years. This Natural England ban is documented under the agency’s 2014 Higher Level Stewardship plan for this moor (attached).
- [21] Locations where the fuel loads already are already higher than the Fire and Rescue Service can fight. See the 2022 Peak District Wildfire Risk Assessment, at pages 85-98: https://www.peakdistrictwildfire.co.uk/_files/ugd/9c9ad7_a594c151525a4878a241bac12e93d409.pdf
- [22] “older heather burns with greater intensity”. See page 11, Parliamentary Office on Science and Technology briefing on wildfires: <https://researchbriefings.files.parliament.uk/documents/POST-PN-0717/POST-PN-0717.pdf>
- [23] Scottish Fire Service says burning excess vegetation is “most effective”: [https://www.gwct.org.uk/blogs/news/2023/june/the-wildlife-management-and-muirburn-\(scotland\)-bill-expert-insights-in-scottish-parliament/](https://www.gwct.org.uk/blogs/news/2023/june/the-wildlife-management-and-muirburn-(scotland)-bill-expert-insights-in-scottish-parliament/)

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Attachment 1 – Natural England 2014 Higher Level Stewardship map for Saddleworth Moor, with the 2018 wildfire ignition location marked in black with an x.

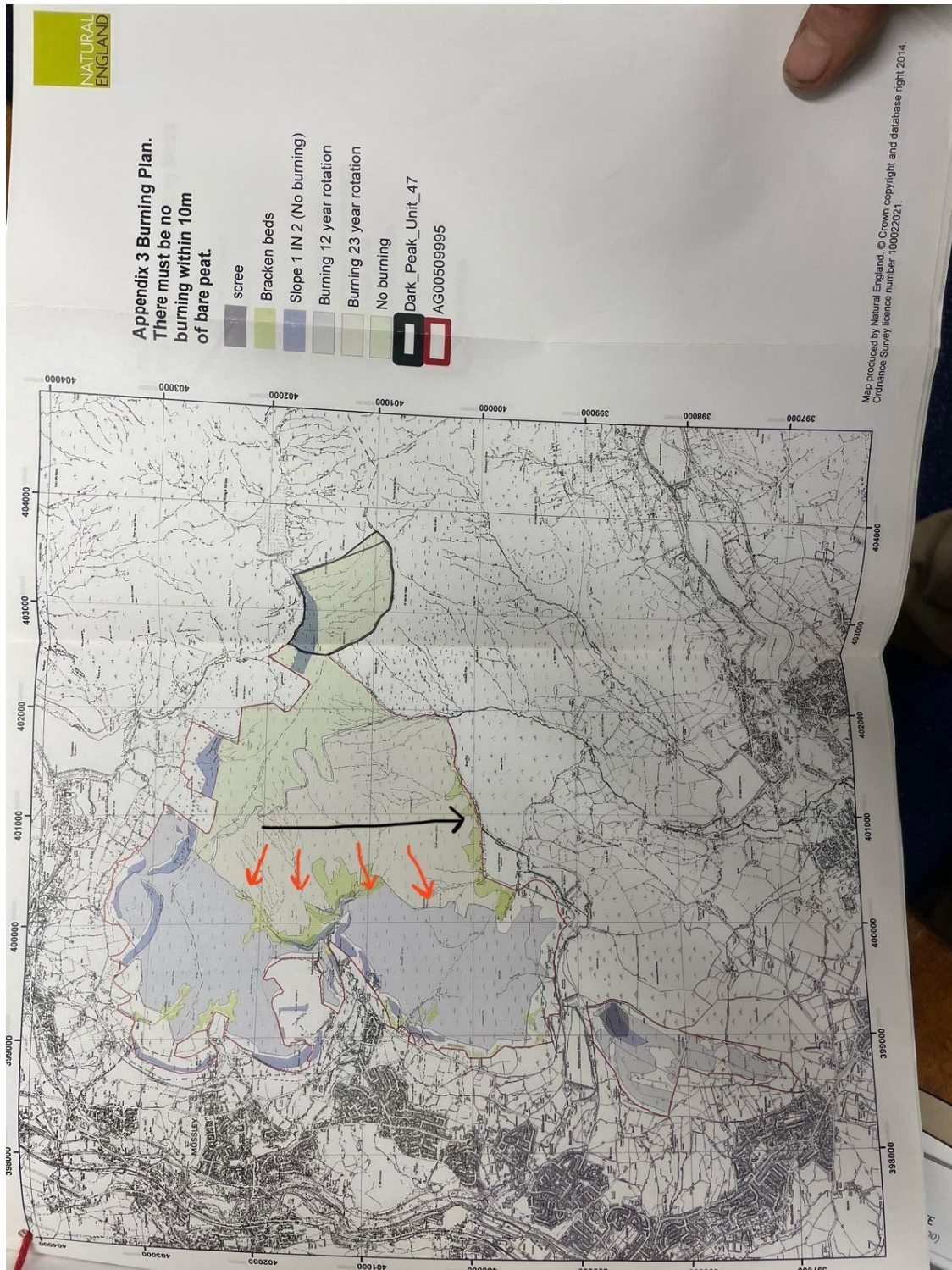


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Attachment 2 - Natural England 2014 Higher Level Stewardship map for Saddleworth Moor, with the direction of the 2018 wildfire advance marked with arrows.



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