



## The Moorland Association

Jon Pearce MP  
House of Commons  
London SW1A 0AA

27 April 2026

Dear Mr Pearce,

### **High Peak is the most vulnerable constituency to wildfires**

We face a wildfire crisis. Last year was by far the worst we have had and the National Fire Chiefs Council has explicitly warned that, by preventing the reduction of vegetation fuel loads, Defra is threatening the lives of “firefighters and the public”.<sup>1</sup>

Parliament is responding with the Environmental Audit and EFRA Select Committees taking evidence.<sup>2</sup> Please would you urge ministers to initiate a review of last year’s Heather and Grass Burning Regulations?<sup>3</sup>

The attached spreadsheet sets out your constituency’s vulnerability to wildfires. It draws together open-source data on local fire weather, vegetation volume and the proximity of homes to this fuel. It then creates an overall risk ranking.

Being lower on the list offers no immunity: EFRA highlighted how 20 homes were destroyed by a grass fire in Dagenham and Rainham.<sup>4</sup> It is 561<sup>st</sup> on our list. Those homes burnt in minutes, when the fire service was overwhelmed attending other wildfires.

### **International comparisons**

In the British Army I fought wildfires in Germany which involved evacuating villages as flames bore down. Last year’s Los Angeles fire shows how lethal they can be.<sup>5</sup>

Yet globally, wildfires are coming under control. Despite climate change, they have fallen by around a quarter since 2000.<sup>6</sup> By contrast, in the UK last year, we had five times the average.<sup>7</sup>

The European Commission, the G7 and the USA are tackling the threat by encouraging more grazing, mowing and winter burns in fire-prone landscapes.<sup>8</sup> But England is moving in the opposite direction.

For years Defra has sharply reduced all these ways of reducing vegetation.<sup>9</sup> Last September, it doubled down by imposing a de facto ban on winter burns over all deep peat.

Defra said this ban would “bring England’s regulations more in line with Scotland.”<sup>10</sup> Not so. Scotland firmly endorses winter burns saying that this ‘muirburn’ makes:

*“a significant contribution both to preventing and reducing the risk of wildfires. In addition, the gamekeepers and shepherds who undertake muirburn have a crucial role to play in tackling wildfires where their*

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*knowledge, skills, expertise and equipment can be invaluable in bringing outbreaks of wildfire quickly under control.”<sup>11</sup>*

That tribute to rural workers is critical. Big cuts in the number of firefighters, down by a quarter over the last seven years, means fire chiefs in Scotland and England need help from the community to fight wildfires.<sup>12</sup> Upland communities also invest heavily in vehicles and water-spraying kits vital to suppressing the flames.<sup>13</sup> The ban on winter burns threatens that capability. They cannot justify buying equipment when the winter burns for which it is primarily used are forbidden.

### **Is Scotland wrong?**

On this critical issue of public safety there is a stark policy divide between Scotland and England.

Scotland has nearly three times more peat than England<sup>14</sup> and believes winter burns protect these carbon stores. Over the last year Scotland permitted thousands of burns over deep peat. Defra allowed precisely zero.

Scotland's winter burns take place when the roots are wet, so the fire does not spread into the soil. These burns remove 80% of the vegetation,<sup>15</sup> which means that, if they do get a summer wildfire, it lacks the fuel to keep going. Less fuel means fewer glowing embers after the fire front passes which makes it harder for the fire to transmit to the peat.

Winter burns also create natural firebreaks and replace older branches with younger, moist vegetation.

England, by contrast, has ever-increasing fuel loads of drier vegetation.

### **Zombie fires**

Defra used to agree with Scotland. In 2007, it said that ending winter burns would produce “a much-increased risk” of “very destructive” fires.<sup>16</sup>

And that is precisely what happened in areas where officials stopped these preventative measures. The 2018 disaster on Saddleworth Moor, which exposed five million people to smoke, and last year's fire at Fylingdales both started on land where Natural England had blocked winter burns.<sup>17 18</sup>

The Fylingdales blaze consumed peat containing 42,000 tonnes of carbon.<sup>19</sup> It started last June and was thought to have burnt out. But smouldering peat suddenly reignited and a ‘zombie fire’ flared up. It became so severe that it threatened the critical military base. It kept burning until December with the peat only saved where historic winter burns had reduced the fuel load.<sup>20 21</sup>

### **Water helps**

Defra's alternative to reducing vegetation fuel loads is to make the soil wetter. It told the Environmental Audit Committee in March that this was “the best way... to tackle wildfire”.<sup>22</sup>

Now, everyone agrees that wetter ground does reduce wildfire risk. However, rewetting is far from enough to stop our wildfire crisis. Our primary focus must be keeping vegetation under control.

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This is not least because, as climate change dries our landscape, rewetting is not always possible, especially on steep slopes.

Everyone also agrees that Whitehall policy back in the 1960s was a disaster. Then officials pushed land managers to build ditches to dry out our moorlands. That destroyed huge quantities of peat, releasing its carbon.<sup>23</sup>

Today's Defra officials argue that winter burns also dry out the soil. Yet two recent Government-funded studies show the opposite is happening. One by Exeter University found that winter burns neither heat the soil nor damage the peat.<sup>24</sup> This is consistent with the widely viewed "Mars Bar" video which shows how flames from winter burns pass so quickly that the chocolate resting in the moss does not melt.<sup>25</sup>

A second study by York University found that winter burning leads to the ground becoming "significantly wetter".<sup>26</sup> That is the very outcome Defra says it wants.

### Peer pretence

Defra's policy relies on a Natural England Evidence Review, which Defra says was subject to "rigorous" peer review.<sup>27</sup>

But how rigorous? Toby Perkins noted at his Environmental Audit Committee (EAC) that one of the Natural England reviewers admitted he could not "pretend to have read it end to end" while another stated that their "brain could not keep track".<sup>28</sup>

There is another Defra credibility problem: a month after the National Fire Chiefs Council (NFCC) had warned that the policy endangered lives, officials arranged for them to meet the minister. But then they failed to produce a minute. In March of this year, a few hours ahead of Mr Perkins' hearing, Defra told Parliament that this had been due to an "administrative error".<sup>29</sup>

### Preventing fires

Given the NFCC's unambiguous warning, an immediate post-season review of the new regulations is the minimum Defra ministers should do. Please would you ask for this and also request that your local Fire and Rescue Service write to the EFRA Committee before 15 May.

We need to bring to the table community firefighters who desperately want to prevent wildfires because otherwise they end up having to fight them. These brave men and women are being blocked from doing the preventative work that keeps your constituents safe.

This is no time for tweaking policy. A rapid reversal is needed to protect homes and people. We cannot avoid intense wildfires if we have ever-increasing fuel loads. Burning, mowing and grazing have been the common-sense answer for thousands of years.

Flames move faster than officials. If there is no change, sooner or later, there will be a deadly fire. The ensuing political firestorm would not bring back lost lives.

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My association has been writing to ministers since January of last year outlining the problems. Defra officials have carried on regardless. Their policy is reckless. Ministers have been warned in the clearest possible terms by the fire chiefs. They must now act.

Yours sincerely,

**Andrew Gilruth**

Chief Executive

Moorland Association

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### Sources

[1] National Fire Chiefs Council warned last year that Defra's restrictions would increase "the danger to firefighters and the public": <https://nfcc.org.uk/wp-content/uploads/2025/05/250523-Heather-and-Grass-Burning-in-England-Consultation-Response-FINAL.pdf>

[2] The Environmental Audit Committee's oral hearing on 4 March 2026 discussed wildfires in detail: <https://committees.parliament.uk/work/9635/peatlands-natural-and-environmental-benefits-and-impacts/>. On 22 April 2026 the EFRA Committee issued a call for evidence on wildfires: <https://committees.parliament.uk/call-for-evidence/3907/>

[3] Defra's 2025 extension of the burning regulations: <https://www.legislation.gov.uk/ukxi/2025/1000/made>

[4] In its call for evidence the EFRA Committee noted that 20 homes were destroyed in 2022 by a wildfire in Wennington which is in the Dagenham and Rainham constituency: <https://committees.parliament.uk/call-for-evidence/3907/> Official firefighters were attending other wildfires at the time: <https://www.myLondon.news/news/east-london-news/east-london-village-destroyed-apocalyptic-27303920>

[5] In Los Angeles there were 31 deaths in January 2025: <https://www.nytimes.com/2025/07/22/us/los-angeles-fires-victim.html>.

[6] Global burnt area has fallen "by around one-quarter" since 2000. See State of Wildfires: <https://essd.copernicus.org/articles/16/3601/2024/>

[7] 2025 was the UK's worst year on record for wildfires with the EU Copernicus EFFIS dataset recorded a burnt area five times the average with 47,879 hectares burnt in 2025 against the average of 8,838 hectares. To check, go to dataset, select "non EU", then "UK", then "2025", then look at "EFFIS Weekly Cumulative Burnt Areas": <https://forest-fire.emergency.copernicus.eu/apps/effis.statistics/seasonaltrend>

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[8] International endorsement of winter burns, grazing and mowing as wildfire-prevention tools.

- European Commission (September 2025) advocated “controlled burning”:  
[https://ec.europa.eu/commission/presscorner/detail/en/speech\\_25\\_2056](https://ec.europa.eu/commission/presscorner/detail/en/speech_25_2056)
- G7 Wildfire Charter (June 2025) called for “controlled burning”:  
<https://www.pm.gc.ca/en/news/statements/2025/06/17/kananaskis-wildfire-charter>
- White House (June 2025) advocated “preventative prescribed fires”:  
<https://www.whitehouse.gov/presidential-actions/2025/06/empowering-commonsense-wildfire-prevention-and-response/>

[9] Defra has sharply reduced vegetation management:

- RSPB scientists found a 73% decline in burning and mowing on grouse moors in the year following Defra’s 2021 regulations:  
<https://zslpublications.onlinelibrary.wiley.com/doi/10.1002/rse2.389>
- Defra data shows an 11% decline in England’s sheep numbers (from 14,921,607 in 2022 to 13,312,071 in 2025). See figure 6: <https://www.gov.uk/government/statistics/livestock-populations-in-england>

[10] Defra said “more into line with Scotland”:  
[https://consult.defra.gov.uk/peatland-protection-team/heather-and-grass-burning-in-england/supporting\\_documents/Heather%20and%20Grass%20Burning%20Consultation%20Document.pdf](https://consult.defra.gov.uk/peatland-protection-team/heather-and-grass-burning-in-england/supporting_documents/Heather%20and%20Grass%20Burning%20Consultation%20Document.pdf)

[11] The Scottish Government’s Strategic Action Plan on Wildfires in March 2026 said muirburn makes “a significant contribution both to preventing and reducing the risk of wildfires”. See “Action 8”:  
<https://www.gov.scot/publications/strategic-action-plan-wildfires/pages/4/>

[12] The Guardian says the number of professional firefighters in England has declined by a quarter over the last seven years – the equivalent to 11,000 full-time jobs:  
<https://www.theguardian.com/uk-news/2025/jun/04/fire-stations-in-england-falling-apart-amid-1bn-funding-cut-chiefs-say>

[13] Scottish moorland estates spend around £4m on firefighting equipment:  
<https://www.scottishlandandestates.co.uk/news/evidence-based-postponement-muirburn-licensing-following-record-wildfires-welcomed-scottish>

[14] Scotland's peatland carbon is 2.8x higher than England’s (1,620 Mt vs 584 Mt): See for Scotland, Chapman et al. (2009): <https://bsssjournals.onlinelibrary.wiley.com/doi/10.1111/j.1475-2743.2009.00219.x> and for England: Section 4 of this Natural England report:  
<https://publications.naturalengland.org.uk/publication/30021>

[15] NatureScot says around 80% of the biomass is consumed by winter burns:  
<https://www.nature.scot/doc/naturescot-research-report-1302-reviewing-assessing-and-critiquing-evidence-base-impacts-muirburn>

[16] Defra’s 2007 Impact Assessment said stopping winter burns would produce “a much-increased risk” of fires that would be “very destructive over a large area”. See paragraph 30:  
[https://www.legislation.gov.uk/uksi/2007/2003/pdfs/uksiem\\_20072003\\_en.pdf](https://www.legislation.gov.uk/uksi/2007/2003/pdfs/uksiem_20072003_en.pdf)

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- [17] Saddleworth 2018: Natural England identified the ignition point at <https://w3w.co/grub.slams.dart>; the head keeper identified it at <https://w3w.co/violinist.circular.speakers>. Both spots sit in an area subject to Natural England's 2014 Higher Level Stewardship plan limiting burning to once every 23 years.
- [18] Fylingdales/Langdale Moor 2025: the fire started on a section of the North York Moors where Natural England had withheld burning consent. Paper in preparation by the University of Exeter.
- [19] 42,000 tonnes of carbon destroyed at the 2025 Fylingdales Moor fire which also threatened the military base. Paper in preparation by the University of Exeter.
- [20] The 2025 Fylingdales/Langdale Moor fire ignited on 28 June 2025, was declared under control in July, re-erupted in August before threatening RAF Fylingdales. It was extinguished only after sustained rainfall in December 2025. See BBC coverage: <https://www.bbc.co.uk/news/articles/c9wpp0g6l4jo>
- [21] Peat at Fylingdales/Langdale Moor was preserved on areas that had previously been managed with winter burns. Paper in preparation by the University of Exeter.
- [22] A senior Defra official told the Environmental Audit Committee that rewetting was “the best way... to tackle wildfire risk”. See: <https://committees.parliament.uk/oralevidence/17294/pdf/>
- [23] State-subsidised moorland drainage, especially in the 1950s and 1960s, drained our moorland by creating thousands of miles of ditches on UK peatlands. “Formed over thousands of years, it has taken just six decades to devastate Yorkshire's peatlands.”: <https://www.ywt.org.uk/what-happened-our-peatlands>
- [24] University of Exeter NERC-funded study found that cool winter burns do not heat peat in a way that could “damage long-term carbon stores”: <https://www.publish.csiro.au/wf/WF25224>
- [25] The Mars Bar video evidence: <https://www.gwct.org.uk/blogs/news/2020/october/latest-call-from-rspb-seems-to-confuse-controlled-and-uncontrolled-burning/>
- [26] University of York Defra-funded study: “burnt plots became significantly wetter”. See page 14: [https://eprints.whiterose.ac.uk/id/eprint/194976/23/Peatland\\_ES\\_UK\\_10\\_year\\_final\\_Report\\_Jan\\_2023.pdf](https://eprints.whiterose.ac.uk/id/eprint/194976/23/Peatland_ES_UK_10_year_final_Report_Jan_2023.pdf)
- [27] Defra told Parliament that the Natural England Evidence Review (NEER155) underpinning its ban had been subject to “rigorous peer review”: <https://questions-statements.parliament.uk/written-questions/detail/2025-12-16/100702>
- [28] Reviewers stated they could not “pretend to have read it end to end” and that their “brain could not keep track”. See Q49: <https://committees.parliament.uk/oralevidence/17294/pdf/>
- [29] Defra told Parliament a few hours before the EAC hearing that its failure to take a minute of the meeting with the NFCC leadership was “an administrative error”. See: <https://questions-statements.parliament.uk/written-questions/detail/2026-02-24/115589>

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