Heat, Drought and Wildfire Resilience

Moorland Association response to the National Heat Risk Commission

Phase 1 - Call for Evidence

30 October 2026

Introduction

The Moorland Association (MA) represents owners and managers of around one million acres of moorland in England and Wales. Our members' experience connects outdoor employment, rural communities, peat, wildlife, water catchments and emergency response. [1] We address the Commission's heat, drought and wildfire remit together. English licensing and access arrangements are identified as such; Scottish experience and UK research inform wider lessons. Our recommendations are proposals, not descriptions of powers already granted. Numbered references at the end explain each source's contribution and limitations.

Summary

The Commission should recommend a funded rural heat and wildfire resilience programme, with named delivery responsibilities and an implementation timetable for 2027. Prevention must be achievable before dangerous conditions develop. Our five priorities are:

1. **Make permissions usable:** coordinate burning licences, protected-site consents, access restrictions, planning and funding; agree evidence requirements early and provide timely escalation.

2. **Manage immediate and long-term risk together:** integrate peatland restoration with proportionate, site-specific vegetation management, assessing the consequences of both intervention and non-intervention.

3. **Fund continuing prevention:** maintain skilled people, access, water, equipment, training and cross-boundary plans - not only restoration capital works or emergency response.

4. **Protect workers and communities:** connect heat, drought, smoke and wildfire warnings to practical action, safe working arrangements and clear public information.

5. **Measure delivery and outcomes:** independently test fuel estimates and management effects, publish decision-to-delivery performance, and track human, ecological and economic harm.

The central test is whether public policy enables safe, lawful and effective action on the ground. Recognising a risk, issuing a conditional permission or funding a plan is not sufficient if the necessary work cannot be delivered.

Question 1

How is extreme heat, and its companion hazards of drought or wildfire, affecting your organisation, sector and the people you work with or serve?

1.1 Heat can bring several wildfire hazards together. Ivison and colleagues analysed 5,845 fuel-moisture samples from 43 UK sites during 2021-23. The July 2022 heatwave synchronised extreme drying of live and dead heather and organic ground fuels. This provides a direct scientific link between exceptional heat and conditions conducive to ignition, spread and peat damage. It strengthens the case for preparedness before an emergency develops. [3]

1.2 MA's evidence describes land managers diverting people, equipment and normal business activity into wildfire response. Their local knowledge and privately maintained resources form part of practical rural resilience, but that contribution has costs and cannot be assumed to remain available without support. [1]

1.3 The drought problem also concerns usable firefighting water. The Environment, Food and Rural Affairs (EFRA) Committee recommends testing water availability and investing in suitable infrastructure. A mapped water source is not necessarily dependable during an extended dry period. [20, paragraphs 55-57] Plans should also address disruption to access and businesses, smoke exposure, and post-fire protection of peat, habitats and catchments.

1.4 Heat is an occupational hazard even when no wildfire occurs. Exertion, clothing and working conditions interact; personal protective equipment may add thermal burden while remaining necessary for safety. [4] MA does not currently have a reliable sector-wide estimate of heat illness, lost working hours or total financial losses. Establishing those baselines is a priority, rather than a reason to postpone proportionate protection.

Question 2

Are some people or communities more affected by extreme heat, drought or wildfire than others?

2.1 Occupation, location and personal circumstances shape vulnerability. Gamekeepers, farmers, contractors and other outdoor workers may undertake strenuous tasks far from shaded rest facilities. Fire response adds radiant heat and protective clothing. Health and Safety Executive (HSE) guidance supports assessment of work rate, clothing, environmental conditions and individual susceptibility. [4]

2.2 Remote and lone working make reliable communications, check-in arrangements and access to assistance especially important. Small rural employers may have limited capacity to develop specialist procedures. We recommend shared practical guidance and funded training that reach contractors and seasonal workers as well as permanent employees.

2.3 The Commission's framing report identifies unequal vulnerability and the limitations of relying on digital warnings. [2, pages 10 and 15-16] Local arrangements should reach older residents, people with relevant health conditions, households without reliable connectivity and visitors unfamiliar with the landscape. Heat, smoke and evacuation messages should be usable through local radio, signs and direct community networks as well as online services.

2.4 Prevention must not transfer disproportionate burdens to individual estates or isolated communities. Temporary access restrictions should be necessary, proportionate, clearly explained and reviewed. Residents' needs and separate public rights of way must be considered; restricting access rights under the Countryside and Rights of Way Act 2000 (CROW) is not the same as closing every route through an area. [19]

Question 3

What is your organisation doing to understand, prepare for and respond to extreme heat, and/or its companion hazards of drought or wildfire?

3.1 With the England and Wales Wildfire Forum, the MA provides Wildfire Awareness Training for Land Managers, covering liaison with Fire and Rescue Services (FRS), fire prediction, safe working and interaction with air and ground assets. [6] Awareness training is not a substitute for operational firefighting qualifications, incident command or a competent assessment of deployment.

3.2 Our published evidence to EFRA's wildfire inquiry proposes funded prevention, regional planning, monitoring and safer integration of land-manager capacity. [1] Our separate evidence to the Public Accounts Committee on environmental regulation argues for clearer responsibilities and locally accountable delivery. [7]

3.3 We provide guidance and pursue casework concerning burning licences, cutting consents and fire-prevention access restrictions. Those cases allow us to test whether procedures translate into deliverable prevention, while distinguishing a member's account from a regulator's decision or an appeal outcome. [15-18]

3.4 The MA has developed provisional fuel-load modelling to invite independent scrutiny, not to substitute for national field measurement. [13] Our October 2026 proposals also set out voluntary tests of long-term management plans and a local delivery mechanism that coordinates permissions, funding and implementation. These remain MA proposals; they are not agreed government programmes. [21]

3.5 Our next priority is to connect this work with rural heat-safety arrangements, consistent incident learning and measurable outcomes. Training participation, modelling and policy engagement are activities - not, by themselves, evidence that harm has fallen.

Question 4

What has worked well, and what have you learnt?

4.1 Organised cooperation can mobilise substantial rural capacity. Scottish Land & Estates' Carrbridge and Dava report records 34 survey responses and contributions from at least 101 employees; 67 had completed an approved muirburn training course. Respondents also reported equipment damage and accidents or near-misses. This is a retrospective account of particular Scottish fires, not a representative UK survey or controlled evaluation of prevention. [5, pages 4-6]

4.2 The operational lesson is to agree contacts, access, communications, competencies, insurance, supervision and safe withdrawal before an incident. Willingness to help is not a safety system. Rural personnel should complement professional responders, not become an assumed substitute for properly resourced services.

4.3 Scientific evidence also requires careful interpretation. Lees and colleagues studied 206 wildfires in England and Wales. They reported an association between management burning and smaller fires, but not lower burn severity. Vegetation and management effects were difficult to separate; restoration was identifiable at only five sites and cutting was insufficiently represented. The findings do not establish causation or a universally superior treatment. [8]

4.4 Natural England's NEER155 records environmental effects of burning and limited UK evidence about its relationship with wildfire. Prescribed burning carries risks, including the possibility of escape. These risks underline the importance of competent operators, appropriate weather conditions, training and robust operational safeguards. [9] The 2025 management code recognises that cutting and burning have different advantages, risks and site constraints. [10]

4.5 Our conclusion is that a lawful toolbox needs site-specific objectives, competent execution and monitoring. Restoration, grazing, cutting, fuel breaks and prescribed burning should be assessed for the particular place and purpose. The appropriate approach will vary between sites, but decisions must evaluate both the environmental effects of proposed management and the foreseeable risks of leaving increasing fuel loads untreated.

Question 5

What tools, information, evidence or guidance do you use, and what is missing or needs to improve?

5.1 We use scientific studies, regulatory guidance, local knowledge and wildfire planning. The Met Office Fire Severity Index (FSI) estimates potential severity if a fire starts; it does not predict where or when ignition will occur. [11] North York Moors research also demonstrates landscape-scale variation in fuel moisture. [12] Weather indicators should therefore be combined with local fuel condition, access, water, exposure and response capacity.

5.2 MA's provisional model estimates approximately 1.5 million additional tonnes of heather and grass vegetation in England's uplands since 2005, around 39%. It combines published evidence and datasets; it is not a national field census, does not establish a corresponding percentage increase in fire risk, and requires independent validation. [13] We ask for transparent national fuel baselines, sensitivity testing and repeat field measurements rather than adoption of the estimate as settled fact.

5.3 A linked evidence system should connect FRS incidents, satellite mapping, weather, fuel and management histories with field measures of peat combustion, smoke, ecological damage and recovery. Ignition attribution should distinguish established, suspected and unknown causes. Studies need comparable sites and locations without fires, not only burnt areas.

5.4 Dataset boundaries must be explicit. England's October 2026 provisional statistics cover FRS-attended outdoor fires above 1,000 square metres through 31 August 2026, not all UK fires or a complete calendar year. [22]

5.5 We also need anonymised heat-illness, near-miss and business-disruption data; independently scrutinised cost estimates that avoid double counting; and a common guide translating heat-health, drought and wildfire information into local action. National research should test net effects and feasibility of management options over different timescales, with published methods and uncertainty.

Question 6

What barriers are preventing your organisation or sector from taking further action or delivering planned measures?

6.1 Fragmented permissions can prevent timely action. England's guidance requires licences for specified vegetation burning on peat deeper than 30 cm within Less Favoured Areas, subject to exceptions; relevant Site of Special Scientific Interest (SSSI) consent is separate. Defra's normal 12-week determination aim is not a guarantee that work can proceed within a suitable weather window. [14]

6.2 Burning: at Hurst & Chunal, a licence revised in 2024 recognised wildfire risk but required an approved restoration plan before use. It expired unused in March 2026. Defra concluded that the fifth version of the restoration plan did not satisfy Condition 6. The estate disputes the process's workability. This demonstrates a delivery problem, not an adjudicated finding of wrongdoing. [15]

6.3 Cutting: in an anonymised English protected-site case, Natural England refused firebreak-cutting consent in August 2026, citing potential habitat damage, uncertainty about protected-site integrity and insufficient evidence connecting the proposal to actual ignition risk. Cutting is therefore not automatically an available alternative. This was SSSI consent, not a general cutting licence. [16] The principal purpose of a firebreak is generally to influence fire spread, intensity and opportunities for control, rather than to prevent ignition. Assessments of proposed firebreaks should therefore consider those outcomes, rather than focusing solely on the probability of ignition.

6.4 Access: the Woodhead and Snailsden Section 25 application was decided after 38 days. The authority considered the evidence insufficient; it subsequently asked for the appeal to be dismissed, arguing, among other things, that the immediate risk had passed. That is the authority's position, not an appeal determination. [17] Natural England separately partially upheld shortcomings in information and complaint handling, not a challenge to Section 25's legal interpretation. [18]

6.5 Seasonal opportunities, assessment costs, funding conditions and maintenance capacity compound these barriers. A workable system must identify feasible, lawful risk-reduction options before deadlines expire. The examples justify scrutiny of delivery and alternatives, not automatic approval or removal of environmental safeguards.

Question 7

What do you need from other organisations or institutions to become more resilient to extreme heat?

7.1 Following the Commission's report in 2027, the Ministry of Housing, Communities and Local Government and Defra should jointly publish a funded delivery timetable linking heat adaptation with the response to EFRA's wildfire report. The report recommends improvements to strategy, warnings, prevention and licensing; those recommendations do not themselves change the law. [20] We propose the following responsibilities.

7.2 **Defra and Natural England:** provide one lead contact for related permissions, agree necessary evidence at the outset, coordinate decisions and publish service standards. Where a condition blocks agreed mitigation, resolve it before the management window closes. Refusals should explain feasible alternatives and any residual risk. An expedited route should retain statutory tests, not create consent by default.

7.3 **Relevant access authorities:** clarify individual applications alongside standing FSI-triggered directions. Under Section 25(1)(a), the authority must be satisfied that restricting CROW access is necessary for fire prevention because of exceptional weather or an exceptional change in land condition. [19] Publish evidence, activation and cessation criteria; maintain urgent decision and review arrangements appropriate to temporary danger. Restrictions must be proportionate, with rights of way treated separately.

7.4 **FRS, local resilience partners, land managers and water providers:** maintain shared resource registers; test access and dry-weather water supplies; agree exercises, communications, safe deployment and cost arrangements. Restoration grants and planning decisions should consider emergency access together, without assuming one permission substitutes for another.

7.5 **Employers, HSE and rural bodies:** translate existing advice into task-specific arrangements for cooler working periods, water, shaded rest, symptom recognition and stopping unsafe work. Necessary protective equipment must remain part of competent risk assessment. [4]

7.6 **Local authorities, health partners and funders:** make warnings accessible, plan for smoke and vulnerable people, and support recurring training, maintenance and participation - not just initial capital expenditure.

Question 8

What wider changes would help your sector, communities and the UK become more resilient to increasing heat?

8.1 Rural land management should be an explicit component of national heat adaptation. The Commission's emphasis on accountability and delivery provides an opportunity to connect health, drought, wildfire and the next National Adaptation Programme. [2] We propose three linked changes.

A) A proportionate statutory Wildfire Severity Reduction Duty for relevant public bodies, supported by resources and reporting. Policy, funding and consent decisions should assess consequences for people, fuels, peat, habitats and response capacity, including foreseeable risks of non-intervention. This develops MA's established proposal; it is not an existing duty or an overriding exemption from conservation law. [1]

B) Voluntary pilots of land-manager-led, 25-year management frameworks integrating conservation, grazing, vegetation, water and wildfire objectives. Define recurring activities and operating limits in advance, with review and corrective action. Individual permissions must retain their lawful tests and durations: a 25-year framework does not confer a 25-year burning licence. A local delivery mechanism should coordinate agencies and budgets, retain statutory decisions with their lawful decision-makers and build on existing resilience arrangements. These are MA's October proposals, not agreed government policy. [21]

C) Fund restoration and near-term preparedness together. Defra's 2025 Heather and Grass Management Code prioritises peatland recovery but also recognises that burning and cutting may form part of an agreed wildfire management plan, subject to site-specific assessment. Restoration and immediate wildfire preparedness must therefore be considered together, particularly during the transition towards functioning peatlands. [10] EFRA nevertheless identifies a transition period in which restoration and appropriate fuel management need to work together. [20, paragraphs 160-161] Plans should compare feasible options, including their smoke, escape, machinery, habitat, cost and maintenance implications.

8.2 Across the UK, governments should share warning standards, evidence and incident learning while respecting devolved law. New administrative structures should be justified by improved delivery, not added to existing layers without responsibility or resources.

Question 9

In ten years' time, what would 'good' heat resilience look like?

9.1 By 2036, high-risk upland landscapes should have maintained, funded plans across ownership boundaries, tested through exercises and incident reviews. Workers and communities should know what warnings mean, who is responsible and what action to take.

9.2 We propose an outcome framework with four tests: safer people, demonstrated through heat illness and serious near-miss records; dependable preparedness, including access, water and competent response; lower weather-adjusted losses to property, livelihoods, peat and habitats; and effective recovery, assessed through hydrological and ecological condition.

9.3 Wildfire measures must distinguish ignition frequency, spread, intensity, ecological severity and recovery. A reduction in burnt area alone may conceal serious peat damage; a change in recorded incidents may reflect reporting rather than risk. Evaluation should account for weather, vegetation, exposure and management history. [8, 22]

9.4 Regulators should report time from application to decision, discharge of conditions and completion of agreed work. Licences issued, hectares enrolled, grants paid and courses completed are useful activity measures, but insufficient evidence of resilience.

9.5 The Government should establish baselines and milestones following the Commission's report, report annually and commission an independent review after five years. The aim is lower harm and better recovery despite worsening exposure - not an implausible promise that no wildfire will occur.

Question 10

Is there anything else the Commission should understand or investigate?

10.1 The Commission should investigate the gap between an acknowledged risk and completed prevention. A short, independent implementation review should trace selected cases through risk assessment, proposed treatment, permissions, conditions, funding, appeal and actual delivery. It should hear land managers, regulators, conservation specialists and FRS together, record disputed facts fairly, and identify changes that can take effect before the next high-risk season.

10.2 Three questions deserve particular attention. Can a burning licence be made usable within its period? If cutting or burning is refused, what feasible alternative addresses the risk, by when and with whose resources? Can an urgent access decision and its review occur while protection is still useful? The cases in Question 6 make these practical questions, without predetermining their legal merits. [15–18]

10.3 The Commission should also request transparent evidence assurance: publish the scope, appraisal method, uncertainty and applicability of research used in policy. MA's EFRA evidence records concerns about review assurance; these are concerns to examine, not proof that all underlying research is invalid. [1, Annexes A–B] NEER155 addresses environmental effects of burning and should not be treated as a universal comparison of every wildfire-management option. [9, 20, paragraph 166]

10.4 Finally, independently validate fuel trends and compare prevention costs with avoided human, economic and ecological harm. Record uncertainty and avoid double counting; MA's provisional model is a hypothesis to test. [13] The Commission should secure clear ownership, practical deadlines and public reporting of whether agreed prevention happens.

References and source summary

Sources checked to 30 October 2026. Published material is linked rather than reproduced or attached. Page and paragraph references identify the relevant passages. Unpublished correspondence is summarised only to the extent necessary. Further case documents would be supplied only with appropriate permission and redaction.

[1] Moorland Association (2026). Protecting Moorland Communities from Wildfire. Written evidence to the Environment, Food and Rural Affairs Committee, CWR0160. Main submission, especially paragraphs 1-4, 9-23 and 30-55; Annexes A and B on evidence assurance. Published parliamentary evidence. Establishes MA's position on funded prevention, governance, consent reform and operational capacity. It is stakeholder evidence, not a Committee finding. Used in the introduction and Questions 1, 3, 8 and 10.

[2] Howard Boyd E, Longman S and Douglas C (September 2026). A heat circuit breaker for the UK: Preparing for a hotter future. National Heat Risk Commission framing report, especially pages 10 and 14–18. See also the Commission's Phase 1 call for evidence. Framing report. Call for evidence. Frames inequality, implementation, accountability and national adaptation.

[3] Ivison K and colleagues (1 September 2025). Unprecedented UK heatwave harmonised drivers of fuel moisture creating extreme temperate wildfire risk. Communications Earth & Environment 6, 727. DOI 10.1038/s43247-025-02746-8. Research article. Direct evidence linking the 2022 heatwave to simultaneous drying of different fuel layers: 5,845 samples at 43 UK sites during 2021–23. Used in Question 1; no national ignition probability is inferred.

[4] Health and Safety Executive. Temperature in the workplace: Outdoor working and Heat stress. Current guidance accessed 30 October 2026; sections on hot environments, risk assessment and risk reduction. Outdoor working. Heat stress. Supports task-specific occupational precautions in Questions 1, 2 and 7. General guidance must be applied competently to remote work and emergency response; it does not quantify MA-sector illness.

[5] Scottish Land & Estates (16 July 2025). The Response to the Carrbridge and Dava Wildfires by Land-Based and Rural Businesses. Report for the Scottish Government, pages 4-6, especially paragraphs 5-12. Survey report.

Documents personnel, equipment and safety experience from 34 responses. Used in Question 4. Respondent evidence is not a representative UK census; equipment capital value should not be confused with incident expenditure.

[6] Moorland Association and England and Wales Wildfire Forum. Wildfire Awareness Training for Land Managers. Course description accessed 30 October 2026. Course description. Verifies the current awareness course and its subject matter in Question 3. Availability and participation do not demonstrate reduced losses or confer a firefighting qualification.

[7] Moorland Association (January 2026). Written evidence on environmental regulation, ENR0024, to the Public Accounts Committee; especially paragraph 7 and paragraphs 30-37. Published regulatory evidence. Sets out MA proposals on regulatory responsibilities and local delivery. Used in Question 3 as evidence of MA's policy engagement.

[8] Lees KJ, Davies GM and Lenton TM (29 July 2026). Wildfire size, severity and timing vary with dominant vegetation in open landscapes in England and Wales. Ecological Solutions and Evidence 7, e70254; sections 3.3, 4.2 and 5. DOI 10.1002/2688-8319.70254. Research article. Observational analysis of 206 fires. Used in Questions 4 and 9. Reports smaller fires associated with management burning but not lower severity; management/vegetation confounding and sparse restoration/cutting observations limit causal conclusions.

[9] Natural England (31 March 2025). An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water, NEER155. Official published summary and statement of scope. Review and official summary. Identifies environmental effects and limited UK wildfire evidence. Used in Questions 4 and 10. It is neither proof that burning is harmless nor a comprehensive ranking of all wildfire-prevention options.

[10] Defra (2025). Heather and Grass Management Code 2025. Background and section 1 on planning, rewetting and management techniques. Management code. Explains site constraints, risks, restoration objectives and case-by-case planning with relevant authorities. Used in Questions 4 and 8. The code is voluntary guidance; statutory requirements remain separate.

[11] Met Office. Fire Severity Index. Explanation of purpose and use, accessed 30 October 2026. FSI explanation. Distinguishes potential fire severity from prediction of ignition. Used in Question 5. It is an important weather-based input, not a complete assessment of local fuel, exposure or operational capacity.

[12] Little K, Graham LJ, Flannigan M, Belcher CM and Kettridge N (30 January 2024). Landscape controls on fuel moisture variability in fire-prone heathland and peatland landscapes. Fire Ecology 20, 14. DOI 10.1186/s42408-024-00248-0. Research article. North York Moors field research supports combining weather with local landscape information. Used in Question 5. It is not a national trial of management effectiveness.

[13] Moorland Association (1 October 2026). Fuel Load Model: MA Briefing Note for Victoria Atkins MP. See also Protecting the Uplands from Wildfire: Our Letter to the Prime Minister, 12 August 2026, updated 19 October 2026, with model link. Public explanation and model link. Source of the provisional 39% / approximately 1.5 million-tonne estimate, used in Questions 3, 5 and 10. Modelled English upland vegetation, not measured national fuel change or a quantified causal increase in wildfire risk.

[14] Defra (updated 30 September 2025). Guidance: how to apply for a licence to burn on peat deeper than 30cm within a less favoured area. Sections 1, 3 and 5, read with the linked burning rules and exceptions. Licence guidance. Rules and exceptions. Establishes the English licensing route, separate SSSI requirements and normal determination aim in Question 6. Conditions on a historic individual licence should not be assumed to apply identically to every current licence.

[15] Simon Gurney, on behalf of Hurst & Chunal (May 2026). Written evidence CWR0129 to EFRA, especially answers to Questions 1 and 7. Cross-checked against the revised ministerial licence HGBL2223-005A, 20 March 2024, pages 1-2, and Defra's decision of 30 April 2026, pages 1-2, held by MA. Public estate evidence. Supports the chronology and competing positions in Questions 6 and 10. The workability of the process is contested; the underlying correspondence is not reproduced. No claim is made about national licence totals or an adjudicated regulatory breach.

[16] Natural England (11 August 2026). Refusal of consent under section 28E(5) of the Wildlife and Countryside Act 1981 for proposed firebreak cutting on an English SSSI. Anonymised case; decision and reasons, pages 1–5. Unpublished correspondence held by MA. Used in Questions 6 and 10 to show that cutting can itself require consent and environmental assessment. This is a site-specific refusal, not a blanket prohibition. Further identifying material is subject to landowner approval; no sensitive assessment is attached.

[17] Peak District National Park Authority (18 September 2026). Woodhead and Snailsden decision notice, case 2026080869; and letter to the Planning Inspectorate, 19 October 2026, appeal MCA/RES/10001. See MA's public chronology, Section 25 Update, 19 October 2026. Public chronology. Records one application covering two moors, received 11 August and refused 18 September. Used in Questions 6 and 10. The authority sought dismissal; no Inspector's determination is asserted. The 38 days is elapsed time, not an established breach of a statutory deadline.

[18] Natural England (6 October 2026). Tier 2 response, complaint CMPT22026/11745, especially pages 1–5. Public, signature-redacted letter. Original complaint response. Partially upholds shortcomings in information and complaint handling. Used in Questions 6 and 10. It expressly does not determine the legality of FSI policy or the correct interpretation of Section 25.

[19] Countryside and Rights of Way Act 2000, section 25. Natural England and Defra, Open access land and the coastal margin: how to restrict public access, updated 5 November 2025. Section 25. Current English guidance. Legal and operational context for Questions 2 and 7: exceptional weather or land-condition change, relevant authority decisions and separate rights of way. FSI-triggered outline directions are not the statutory wording itself.

[20] Environment, Food and Rural Affairs Committee (21 October 2026). A burning issue: managing wildfire risk. HC 713; especially paragraphs 55-57, 64-65, 126-127, 139-140, 160-166 and 174-180. Committee report. Parliamentary findings and recommendations on water, governance, warnings, restoration transitions and licensing. Used in Questions 1, 7, 8 and 10. Recommendations require a government response and are not changes to law or determinations of individual cases.

[21] Moorland Association (15 October 2026). Sandbox 1: 25-Year Upland Management Plan Test; and Sandbox 2: Regional Upland Delivery Board Experiment. Two MA proposal papers, two pages each; held by MA. Source of voluntary pilot concepts in Questions 3 and 8. Proposals would coordinate delivery while retaining legal safeguards and review; neither government acceptance nor 25-year duration for individual permissions is implied. Copies can be supplied by MA.

[22] Ministry of Housing, Communities and Local Government (8 October 2026). Provisional wildfire statistics for England, 2010 to 2026. Scope and coverage statement. Official statistics. Defines the dataset boundary used in Questions 5 and 9: FRS-attended outdoor fires above 1,000 square metres, through August 2026. The series is provisional; comparisons must use consistent geographical coverage, periods and definitions.