

Annex F to the Moorland Association submission to the Environment, Food and Rural Affairs Committee inquiry: Wildfire risk and response 2026

Fire and Rescue Service consultation responses: NFCC and Northumberland FRS key extracts

Purpose of this annex

1. This document is Annex F to the Moorland Association's submission to the Environment, Food and Rural Affairs Committee inquiry, *Wildfire risk and response*. It summarises relevant extracts from the National Fire Chiefs Council and Northumberland Fire and Rescue Service responses to Defra's 2025 *Heather and Grass Burning in England* consultation.
2. The purpose of this annex is to show that concerns about further restrictions on prescribed burning are not confined to land managers. Fire and Rescue Service bodies also warned that further restrictions could increase fuel loads, wildfire severity, pressure on Fire and Rescue Service resources, and risks to firefighters and the public.
3. This annex does not argue for unrestricted burning. It shows that Fire and Rescue Service responses support a balanced, licensed and risk-based approach in which prescribed burning remains available as one tool for wildfire-risk management where justified, properly planned and safely undertaken.

1. Source documents

4. The source documents are:
 1. **National Fire Chiefs Council response to Defra's Heather and Grass Burning in England consultation**, dated 23 May 2025. NFCC described itself as the professional voice of UK Fire and Rescue Services, comprising a council of UK Chief Fire Officers and a wider membership.
 2. **Northumberland Fire and Rescue Service response to Defra's Heather and Grass Burning in England consultation**, dated 23 May 2025. Northumberland FRS described itself as covering the rural county of Northumberland and as one of the leading Fire and Rescue Services in the UK for wildfire issues, training and operational response.
5. Both responses were submitted to Defra's consultation on proposed changes to the Heather and Grass Burning Regulations in England.

2. Relevance to EFRA's wildfire inquiry

6. The Committee's inquiry asks what resources and training emergency services need; what policies are needed to reduce wildfire severity and socio-economic impacts; how land management should be used to prevent and control wildfires; and how government should coordinate a cross-departmental approach.
7. The NFCC and Northumberland FRS responses are relevant because they address those issues directly from the perspective of Fire and Rescue Service bodies. They warn that land-management restrictions can have operational consequences for wildfire preparedness, response, public safety and firefighter safety.
8. The responses support three propositions in the Moorland Association's main submission:
 1. wildfire policy must integrate land management, fire response and environmental objectives;
 2. prescribed burning should remain available as a properly licensed wildfire-risk management tool where justified;

3. policy changes that increase fuel loads or restrict practical vegetation management may create unintended public-safety and environmental consequences.

3. Cross-government inconsistency and the need for an integrated wildfire strategy

9. The NFCC warned that policy decisions in different parts of Government may conflict. It stated that environmental protection and biodiversity initiatives are not always aligned with wildfire-risk management, and that without appropriate mitigation they could inadvertently increase fire loads and the risk of larger, more intense wildfires.
10. It called for a more integrated, cross-Government approach to wildfire prevention, mitigation, response and recovery, including a national wildfire strategy bringing together relevant stakeholders across the four UK nations.
11. Northumberland FRS made a similar point. It warned that policy decisions in some areas of Government may conflict with those being developed elsewhere and that, without appropriate mitigation, environmental policies could increase fire loads and the risk of larger, more intense and destructive wildfires.

Relevance to the MA submission

12. These Fire and Rescue Service responses support the MA's recommendation for a formal cross-government Wildfire Resilience Board. They also support the argument that wildfire is not solely an environmental or habitat issue: it is a public-safety, land-management and civil-resilience issue.

4. Prescribed burning as a wildfire-prevention and severity-reduction tool

13. The NFCC stated that it was concerned some consultation proposals could have unintended negative consequences. It warned that further restricting land managers' ability to use prescribed burning as a wildfire-prevention tool could compromise Fire and Rescue Service preparedness and response, increasing danger to firefighters and the public.
14. It also stated that prescribed burning during winter months has proven to be an effective tool in lessening the risk and severity of wildfires. It recognised the environmental and health impacts of prescribed burns and associated smoke, but warned that if regulatory change led to more wildfires, the resulting environmental damage and smoke would be far greater and spread over a larger area.
15. Northumberland FRS similarly stated that proposed restrictions could further restrict land managers' ability to use prescribed burning as a wildfire-prevention tool, compromising preparedness and response and increasing danger to the public and firefighters. It stated that prescribed winter burning had been effective in lessening wildfire risk and severity in Northumberland.

Relevance to the MA submission

16. This directly supports the MA's case that wildfire policy should be severity-led. The relevant policy question is not whether prescribed burning should be used everywhere. It is whether, in particular landscapes and conditions, it can reduce fuel load, fire intensity, spread, suppression difficulty and risk to people, peat and property.

5. Fire and Rescue Service resource pressures

17. The NFCC stated that wildfires are becoming an increasingly common part of Fire and Rescue Service response and prevention activity as the UK experiences more extreme weather due to climate change. It noted that wildfires are starting earlier in the season and typically lasting longer due to prolonged higher temperatures.
18. It also said wildfire response requires significant Fire and Rescue Service resources, including large numbers of firefighters and equipment over prolonged periods of days or weeks. It noted that

wildfire response is not separately funded and falls within the general duty of Fire and Rescue Services to extinguish fires. NFCC warned that any regulatory change that inadvertently increased the frequency or severity of wildfires would further stretch limited resources and could affect Fire and Rescue Services' ability to keep communities safe.

19. Northumberland FRS made the same point in local terms. It stated that responding to wildfires already requires significant NFRS resources, including firefighters and equipment over prolonged periods, and that changes increasing wildfire severity would further stretch limited resources and could affect Fire and Rescue Services' ability to keep communities safe.

Relevance to the MA submission

20. These responses support the MA's recommendation for stronger Fire and Rescue Service wildfire capability, better land-manager integration, a Rural Wildfire Response Partnership and funding for prevention before incidents become large, prolonged and resource-intensive.

6. The 30cm peat-depth proposal

21. The NFCC stated that it could not support the proposed extension of the prohibition on burning from peat over 40cm deep to peat over 30cm deep. It said such a change would greatly reduce the area of countryside where wildfire risk can be managed using prescribed burning. NFCC said the evidence and stated benefits were not sufficiently compelling and did not outweigh the greater flexibility that maintaining a limit above 40cm would provide for effective wildfire-risk management.
22. The NFCC also warned that deep peat fires during the prescribed burning season are very unusual and are far more likely during the drier summer months. It said prescribed burns undertaken at the right time, by the right people and with the right training had proven to be an effective land-management tool, and that reducing the limit to 30cm could have the perverse effect of causing more damage to peat habitats by leading to more severe summer wildfires.
23. Northumberland FRS also did not support the proposed change from 40cm to 30cm. It said the change would greatly reduce the area of countryside within Northumberland where wildfire risk can be managed using prescribed burning. It warned that prescribed burning at the right time, by the right people and with the right training had proven effective, and that reducing the limit could have the perverse effect of causing more severe wildfires.

Relevance to the MA submission

24. This supports the MA's argument that policy should not impose tighter restrictions without properly weighing wildfire severity, peat ignition risk, Fire and Rescue Service capacity, and the availability of practical alternative management tools.

7. Retaining licence grounds where other management is impracticable

25. The NFCC opposed removing licence ground (d), which related to circumstances where specified vegetation is inaccessible to mechanical cutting equipment and other methods of management are impracticable. NFCC warned that, in some areas, any method of management other than prescribed burning will be impractical because of terrain or accessibility. It said removing that licence ground could leave land managers with no practical means of managing vegetation, increasing wildfire risk.
26. The NFCC recognised that land managers might still apply for a licence to reduce wildfire risk, but warned that it was not clear how Natural England would assess an application purely for that purpose. It said it would not wish to see licence grounds become so stringent that licences are effectively prevented except in extreme cases, as that could mean some landscapes are no longer managed for certain activities, greatly increasing wildfire risk.
27. Northumberland FRS took the same position. It did not support removing ground (d), warning that, in some areas, prescribed burning may be the only practical management method because terrain or

accessibility makes other options impracticable. It also warned that it was unclear how Natural England would assess wildfire-risk applications and that overly stringent grounds could leave landscapes unmanaged, increasing wildfire risk.

Relevance to the MA submission

28. This supports the MA's recommendation for a fast, locally informed public-safety consent route for fuel-reduction work. It also supports the argument that cutting, grazing, rewetting and prescribed burning should be treated as a site-appropriate toolkit rather than as interchangeable substitutes.

8. Licensing, scrutiny and safeguards

29. The NFCC made clear that it supports licensing measures to ensure burns are undertaken at the correct time, by people with the correct training, and for the right reasons. It also said the risk of prescribed burning being used as a first rather than last resort is mitigated by Natural England's licence approval process, which provides scrutiny and oversight.
30. Northumberland FRS similarly supported licensing and oversight but warned against restrictions so stringent that prescribed burning becomes unavailable even where needed for wildfire-risk management.

Relevance to the MA submission

31. These responses support the MA's position that prescribed burning should not be unrestricted, but should remain available under a proportionate, transparent and risk-based licensing framework.

9. Training, wildfire-risk management plans and good practice

32. The NFCC supported accredited training prior to burning under licence. It encouraged Government to require training to include completion of a Wildfire Risk Management Plan and the use of prescribed burning as part of wider wildfire-risk management. NFCC said this would enhance good practice.
33. It also cautioned that training should distinguish between managing prescribed burns and attempting to extinguish wildfires. It said land managers should not be given the impression that prescribed-burning training qualifies them to fight fires professionally or imposes a responsibility to extinguish wildfire.
34. Northumberland FRS supported accredited training for supervisory practitioners and recommended that supervisory practitioners be present and directly involved in prescribed burns. It also encouraged wildfire-risk management planning and the use of prescribed burning as part of that management.

Relevance to the MA submission

35. This supports the MA's recommendation for accredited land-manager training, joint planning with Fire and Rescue Services, and pre-agreed protocols clarifying roles, responsibilities and safety during wildfire incidents.

10. Fire and Rescue Service live-fire training and collaboration with land managers

36. The NFCC stated that Fire and Rescue Services do not currently directly apply for licences to burn, but some collaborate with land managers undertaking prescribed burns under licence in order to undertake live-fire training. NFCC requested confirmation that Fire and Rescue Services would not be required to apply for licences to undertake such live-fire training and that collaborative approaches with licensed land managers could continue.
37. Northumberland FRS made a similar point. It stated that it assists land managers in Northumberland to undertake prescribed burning to help manage or reduce wildfire risk and to provide live-fire training for NFRS personnel. It asked for confirmation that Fire and Rescue Services would not need

to apply for licences to undertake live-fire training and that collaborative approaches alongside land managers could continue.

Relevance to the MA submission

38. This supports the MA's argument that active moorland management helps maintain local fire knowledge, practical fire experience and collaborative response capability. If prescribed burning becomes impractical or unavailable, Fire and Rescue Services may also lose valuable training opportunities with land managers.

11. Northumberland-specific operational context

39. Northumberland FRS stated that it covers a rural county and is one of the leading Fire and Rescue Services in the UK for wildfire issues, wildfire training and operational response, based on experience responding to significant wildfires over many years.

40. It also warned that wildfires are starting earlier and lasting longer due to prolonged higher temperatures, and that storm events in Northumberland have blown down significant quantities of trees that have become potential wildfire fuel. It said climate projections suggest such weather phenomena will increase in frequency and severity over coming years.

Relevance to the MA submission

41. This provides a regional operational example of why wildfire policy must be grounded in local risk, fuel conditions and Fire and Rescue Service experience. It supports the MA's recommendation for Regional Wildfire Resilience Partnerships built around land managers and Fire and Rescue Services.

12. Summary of Fire and Rescue Service points relevant to EFRA

42. Taken together, the NFCC and Northumberland FRS responses support the following propositions:
1. wildfire policy requires a more integrated, cross-government approach;
 2. environmental and biodiversity policy can increase wildfire risk if fuel-load consequences are not mitigated;
 3. prescribed burning can reduce wildfire risk and severity when undertaken at the right time, by trained people, for the right reasons;
 4. further restrictions on prescribed burning may have unintended consequences for firefighter safety, public safety and environmental protection;
 5. Fire and Rescue Services are already under pressure from wildfire incidents, which require significant personnel and equipment over prolonged periods;
 6. the proposed reduction from 40cm to 30cm peat depth was opposed by both NFCC and Northumberland FRS;
 7. licence grounds should retain flexibility where terrain and accessibility make other vegetation-management methods impracticable;
 8. licensing, training and adherence to good practice are important safeguards;
 9. Fire and Rescue Service collaboration with land managers provides practical benefits, including live-fire training;
 10. regional wildfire planning should draw on operational Fire and Rescue Service expertise and local land-manager knowledge.

13. Relevance to the Moorland Association's recommendations

13.1 Wildfire Severity Reduction Duty

43. The Fire and Rescue Service responses support a statutory duty requiring public bodies to assess whether policy decisions increase or reduce fuel load, wildfire severity, firefighter risk and danger to the public.

13.2 Regional Wildfire Resilience Partnerships

44. Northumberland FRS's local operational evidence supports regional wildfire planning based on local fuel conditions, terrain, access, Fire and Rescue Service capacity and land-manager knowledge.

13.3 Fast public-safety consent route

45. The NFCC and Northumberland FRS both warned that if licence grounds become too restrictive, land managers may be unable to manage vegetation even where wildfire risk is identified. This supports a clear, time-limited and locally informed consent route for public-safety fuel reduction.

13.4 Rural Wildfire Response Partnership

46. The responses support better integration between Fire and Rescue Services and land managers, including training, protocols, live-fire experience and clarity about roles during incidents.

13.5 Evidence assurance and adaptive management

47. Both responses warned against policy changes whose consequences may increase wildfire risk. That supports the MA's recommendation that evidence used to restrict fuel-management tools should be transparent, auditable and capable of scrutiny.

14. Conclusion

48. The NFCC and Northumberland FRS consultation responses show that concerns about further restrictions on prescribed burning are shared by Fire and Rescue Service bodies. They also warn that excessive restrictions may reduce the ability of land managers to manage fuel, increase wildfire risk and severity, stretch Fire and Rescue Service resources, and endanger firefighters and the public.
49. Annex F therefore supports the Moorland Association's central submission: wildfire policy should be severity-led, risk-based and operationally grounded. It should integrate land managers and Fire and Rescue Services, preserve appropriate fuel-management tools under safeguards, and ensure that environmental policy does not unintentionally increase the risk of larger, more intense and more damaging wildfires.