



The Moorland Association

The Rt Hon Andy Burnham MP
Prime Minister
10 Downing Street
London
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11 August 2026

Dear Prime Minister,

Protecting the North from wildfire: two decisions to reduce the risk

You have seen first-hand what wildfire means for the North. In 2018, you described the Saddleworth fire as “unlike anything we’ve seen before”.¹ The threat has not receded: 2025 was the UK’s worst year on record and, so far, wildfires in 2026 have burned 2.6 times the long-term annual average.²

I am writing to ask for two decisions. First, commission an independent review led by the Government Chief Scientific Adviser of the fuel accumulating across England’s uplands. Second, place a named minister in charge of acting on that advice through a practical, evidence-led approach to grazing, cutting and prescribed burning.

This would give the Government a scientifically credible route to protect firefighters, Northern communities, critical national infrastructure and public investment in peat restoration, without requiring another major spending programme.

The scale of the change is stark. Copernicus data show that large UK wildfires burned roughly six times as much land in 2016-25 as in the previous decade.³ The 2018 Saddleworth fire exposed around five million people to toxic smoke and is estimated to have caused 28 premature deaths.^{4,5}

Climate change is extending the number of days on which wildfires can occur.⁶ But when an ignition takes place, the severity and suppressibility of the resulting fire are strongly influenced by the quantity, continuity and condition of the vegetation available to burn. Government policy can materially affect those fuel loads through grazing, cutting and prescribed burning.

Fuel determines fire severity

Fuel load is one of the principal determinants of fire behaviour. As fuel loads increase, the fires they support can burn more intensely, with longer flames that are harder for firefighters to suppress.⁷

Last year’s Fylingdales wildfire shows how wide the consequences can be. It posed an active risk to RAF Fylingdales - critical national infrastructure and a site of importance to national security. The incident began in June and was not formally closed until December; initial analysis estimated that the

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direct combustion of peat released 54,258 tonnes CO₂e.⁸ This one incident shows how quickly peat-restoration gains can be undermined when accumulated fuel ignites.

To help close this evidence gap, the Moorland Association has modelled how changes in grazing and prescribed burning have affected vegetation levels across England's uplands. The Moorland Association's initial modelling (attached) shows that since 2005 the amount of vegetation in the uplands has grown by 39%, an increase of about 1.5 million tonnes.⁹ That equates to an extra tonne every seven minutes.¹⁰

Grazing: Our modelling attributes about a sixth (17%) of this increase to reduced grazing.¹¹ Since 2010, sheep numbers in England's Severely Disadvantaged Areas have fallen by 9%,¹² while cattle numbers have fallen by 18%.¹³ Lower grazing pressure allows mature, dry vegetation - including dead *Molinia* grass - to accumulate, increasing the available fuel load.¹⁴

Winter burns: 83% of the build-up in upland vegetation is due to the sharp reduction in winter burns of heather.¹⁵ Heather typically lives for around 40 years. As it matures, it becomes less palatable and cannot be controlled adequately by grazing alone. In 2000 some 11,400 ha (hectares) of upland vegetation were burnt over the winter.¹⁶ By 2022 that was down to 1,859 ha in the wake of 2021 regulations.¹⁷ Last year Defra tightened still further with a de facto ban on any winter burns over deep peat.¹⁸

Climate change: higher atmospheric CO₂ concentrations can stimulate plant growth. The model does not apply a separate uplift for this effect; it uses the plant-growth inputs set out in the attached workbook.¹⁹

The volume of fuel load is worrying, but there is a more subtle problem. That is the increased flammability of the heather caused by old plants not being replaced by young ones through winter burns. Plants which are not managed keep getting older with more of their branches becoming dead. This leads to the moisture content falling from around 90% (measured as a share of dry weight) in younger vegetation²⁰ to about 15% in dead branches.²¹ That is well below the flammability threshold of 60%.²² On the hottest summer days the moisture content falls to about 5%.²³ That is tinder.

Our modelling shows that since 2005, the combination of growth in the volume of heather combined with the ageing of it has led to a 74% increase in this highly flammable dead material.²⁴

There are further compounding factors which trouble those who have to fight these fires. Reduced vegetation management can leave large, continuous expanses of dry vegetation without effective firebreaks. Prescribed burning can create a mosaic of vegetation ages, including younger areas that can help slow the spread of wildfire.

Defra suggests that cutting could be used instead of burning.²⁵ Cutting can have a role, but it is not always a practical or effective substitute for prescribed burning. First, the rules governing cutting on deep peat and protected sites make permission difficult to obtain.²⁶ Second, unless the cut material is collected and removed, dead brash can remain as surface fuel. As the Scottish Fire and Rescue Service told the Scottish Parliament, mowing can leave "a dry layer that actually encourages the spread of fire", whereas prescribed burning "removes a fuel in its entirety".²⁷

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The international direction of travel

Following the 2019–20 bushfires, Australia's Royal Commission called for governments to engage more closely with Traditional Owners and explore greater use of Indigenous land and fire-management knowledge. California has adopted a strategic plan to expand prescribed and cultural burning as part of its wildfire-resilience programme.^{28,29,30}

In 2025, the European Commission, the US federal government and the G7 all recognised controlled or prescribed burning as one element of integrated wildfire prevention.^{31,32,33} Yet Defra tightened England's restrictions on winter burning, saying this would bring England "more in line with Scotland".³⁴ Scotland's position is more nuanced: its 2026 Strategic Action Plan states that muirburn can make "a significant contribution both to preventing and reducing the risk of wildfires", while retaining licensing and training requirements to ensure that it is carried out safely.³⁵

Based on published estimates of annual burn area and average burn size, we estimate that thousands of winter burns take place over deep peat in Scotland each year.³⁶ In England, Defra's licensing scheme did not authorise a single winter burn over deep peat.³⁷ Wales and Northern Ireland also allow winter burns.

Concerns are growing in Parliament. Parliament is probing the fuel-load issue³⁸ and an All-Party Parliamentary Group on Wildfires has been established.³⁹

Protecting peat

Defra is spending tens of millions on restoring our peatlands by 'rewetting the land'.⁴⁰ Natural England argues that this is "the best way" to tackle wildfire.⁴¹ The aim is to one day create a "fire resilient landscape".⁴²

The Moorland Association supports rewetting where it is feasible, effective and appropriate. It cannot, however, be delivered everywhere and is neither a universal nor immediate solution to wildfire risk. Its feasibility and effectiveness depend on the hydrology, topography and condition of individual sites. Even where rewetting is achievable, it does not make peatland fireproof or remove the need to manage vegetation and fuel loads, including while restoration takes effect.⁴²

Defra contends that winter burns "damage" the peat.⁴³ However, a recent Government-funded study found that properly conducted prescribed burns did not expose the underlying soils to temperatures capable of directly damaging long-term carbon stores.⁴⁴

Another study challenged the assumption that prescribed burns necessarily 'dry out' peat: a ten-year University of York study found that burnt plots became "significantly wetter", with mean water tables approximately 2cm higher. By contrast, where heather was left unmanaged, water tables gradually dropped and the peat dried out.⁴⁵ Rewetting is also not, by itself, a guarantee against wildfire: the National Trust's Marsden Moor, where substantial rewetting work is under way, experienced six large wildfires between February 2019 and March 2022.⁴⁶

While this debate continues we are witnessing the destruction of peat reserves which took thousands of years to develop.

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Why an independent review is needed

Prescribed burning remains an accepted land-management tool elsewhere. Forestry England, for example, continues to use prescribed burning in selected areas to maintain and protect open forest habitat.⁴⁷ Yet no winter burn over deep peat has been authorised under England's current licensing scheme.³⁷

A NERC-funded group of UK wildfire scientists, including Professors Belcher, Doerr, Kettridge and Gaston, submitted that there was “not sufficient evidence” for the further tightening.⁴⁸ Defra's published consultation outcome made no reference to this submission.

Defra cited a Natural England evidence review and told Parliament that it had undergone “rigorous” peer review.⁴⁹ Yet at the Environmental Audit Committee, Toby Perkins MP noted that one reviewer could not “pretend to have read it end to end”, while another said their “brain could not keep track”.⁵⁰ Subsequent exchanges have left unresolved questions about the review, the extent of its peer review and its quality assurance.⁵¹

The National Fire Chiefs Council also warned that the legislation could increase the danger to “firefighters and the public”.⁵² Officials arranged a meeting between the NFCC and the minister, but Defra subsequently told Parliament that no minute had been produced because of an “administrative error”.⁵³

The present approach also sits uneasily with Defra's own 2007 impact assessment which said that stopping winter burns would produce “a much-increased risk” of fires that could be “very destructive over a large area”.⁵⁴ The latest legislation was introduced without an impact assessment.⁵⁵

Firefighting communities

The first responders to upland wildfires are often gamekeepers and farmers. Their estates fund the all-terrain vehicles, water bowsers and specialist equipment that can help contain fires while they are still small.⁵⁶ That local capability is increasingly important at a time when England has around a quarter fewer professional firefighters than in 2010.⁵⁷

It depends upon viable land-management businesses retaining trained staff, vehicles and specialist equipment. If policy makes those businesses less viable, Government risks losing a locally funded first-response capability which supports the professional fire services.

The principal tools and expertise already exist: trained land managers, grazing animals, fire services, specialist equipment and prescribed-burning skills. The Climate Change Committee, the National Fire Chiefs Council and expert evidence to Parliament have each identified the need for better cross-government coordination.^{58,59,60} What is missing is an independent assessment of the accumulating fuel risk and a regulatory framework that allows it to be managed safely. This need not become another major spending programme.

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Two decisions

1. Commission the Government Chief Scientific Adviser to lead a rapid, independent, cross-government review of upland fuel loads and wildfire risk. It should examine the Moorland Association's initial internal assessment and its underlying assumptions, consider the latest Exeter and York evidence, and take evidence from fire services, land managers, Defra and Natural England. We ask that interim advice be provided by 1 October 2026.
2. Appoint a single named minister to coordinate the Government's response and require that response within 28 days of receiving the scientific advice. It should establish annual fuel-load monitoring and site-appropriate target ranges, together with lawful and workable routes for achieving them through grazing, cutting and trained prescribed burning - including on deep peat where evidence shows this to be necessary and proportionate. A licensed and trained route comparable to Scotland's should be available where appropriate.

Eight years ago, you stood at Saddleworth Moor and said that the fire was "unlike anything we've seen before".¹ You now have the opportunity to reduce the risk and severity of the next such fire.

I would be grateful if you would confirm that the Government will take these two steps. We attach our preliminary modelling, sources and assumptions for independent examination and stand ready to contribute our practical land-management expertise. I would also welcome the opportunity to bring some of the keepers and farmers who fight these fires to meet you.

Yours sincerely,

Andrew Gilruth

Chief Executive

Moorland Association

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Attachment:

Moorland Association, *Provisional Upland Fuel Load Model V6* (Excel workbook, August 2026). This is an initial internal assessment and has not been independently validated or peer reviewed.

Sources:

- [1] The size and scale of the fire was "unlike anything we've seen before". Andy Burnham, Mayor of Greater Manchester, speaking at Saddleworth, 27 June 2018: <https://www.theguardian.com/uk-news/2018/jun/27/saddleworth-moor-wildfire-army-called-in-to-tackle-fire>
- [2] UK burned 47,879 ha in 2025, "the worst on record", and 22,850 ha in 2026 to date against a 20-year average of 8,838 ha (2.6 times). EFFIS, Copernicus, Annual Statistics for the United Kingdom: <https://forest-fire.emergency.copernicus.eu/apps/effis.statistics/seasonaltrend> Accessed 11 August 2026; latest available data to 5 August 2026.

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- [3] Large UK wildfires (EFFIS maps fires of about 30 ha or larger) burned roughly 151,954 ha in 2016-2025 against 24,805 ha in 2006-2015: a 6.1-fold rise. EFFIS, Copernicus, Annual Statistics for the United Kingdom (select United Kingdom, annual burnt area): <https://forest-fire.emergency.copernicus.eu/apps/effis.statistics/seasonaltrend>
- [4] "Five million people" in the region forced to inhale toxic wildfire smoke. BBC News, 26 April 2020: <https://www.bbc.co.uk/news/uk-england-manchester-52208610>
- [5] The Saddleworth smoke plume is estimated to have caused about "28 premature deaths". Graham et al, "Impact on air quality and health due to the Saddleworth Moor fire in northern England", Environmental Research Letters, 2020, see Abstract: <https://iopscience.iop.org/article/10.1088/1748-9326/ab8496>
- [6] Climate change is lengthening the UK fire season: "very high" fire-danger days are projected to more than quadruple, "up to 111 days in the South East and 121 days in the East of England". Arnell, Freeman and Gazzard, "The effect of climate change on indicators of fire danger in the UK", Environmental Research Letters, 2021, 16(4) 044027, see Results / Table 3: <https://iopscience.iop.org/article/10.1088/1748-9326/abd9f2>
- [7] Fireline intensity is the rate of heat released by the flaming front per unit length. Byram's established equation: $I = Hwr$ —calculates it from the heat yield of the fuel (H), the mass of fuel consumed in the flaming front (w) and the fire's rate of spread (r). Other factors being equal, intensity therefore increases directly with the amount of fuel consumed. Greater fireline intensity is associated with longer flames and reduced suppression capability. Patricia L. Andrews and Richard C. Rothermel, *Charts for Interpreting Wildland Fire Behavior Characteristics*, USDA Forest Service General Technical Report INT-131 (1982), pp. 2–3 and Table 1: USDA Forest Service report, <https://research.fs.usda.gov/download/treesearch/22647.pdf>. Method and coefficients applied in the MA England Fuel Load Model, Calculations Inputs sheet.
- [8] North Yorkshire Local Resilience Forum, *Report to the Fylingdales Moor Fire 2025: Part 1 Response* (June 2026), pp. 8–9, 13 and 41. The report records the fire's June origin and subsequent continuation, its formal closure on 22 December, and the active risk posed to RAF Fylingdales, which it describes as a site of importance to national security. Initial University of Exeter analysis estimated emissions from the direct combustion of peat soil at 54,258 tonnes CO₂e.
- [9] Upland vegetation has grown 39% since 2005 (2,826 to 4,080 kt heather plus 1,000 to 1,248 kt grass = 3,826 to 5,328 kt). MA England Fuel Load Model (attached), Summary sheet, "all fuels" row.
- [10] A 39% rise of about 1.5 million tonnes over 20 years is equivalent to roughly one tonne every seven minutes. MA England Fuel Load Model (attached), Summary sheet (derived from the "all fuels" increase).
- [11] About "17%" of the modelled increase is attributable to reduced grazing. MA England Fuel Load Model (attached), Summary sheet, grazing contribution row.
- [12] Defra, June Survey of Agriculture and Horticulture, *Less Favoured Areas*, "Livestock (animals)" sheet. The number of sheep and lambs on commercial holdings in England's Severely Disadvantaged Areas fell from 4,513,629 in 2010 to 4,090,815 in 2025 - a reduction of 9.4%: <https://assets.publishing.service.gov.uk/media/69e0b319a68b527bd9408f85/structure-england-june-less-favoured-areas-16apr26.ods>

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- [13] The same Defra dataset records that cattle numbers on commercial holdings in England's Severely Disadvantaged Areas fell from 522,150 in 2010 to 430,514 in 2025 - a reduction of 17.6%, rounded to 18%. The beef breeding herd fell by 30.6%, from 149,973 to 104,111.
- [14] National Sheep Association, "Grazing is part of multi-prong answer to severe wildfires", 15 July 2026. The NSA states that agri-environment schemes have encouraged significant reductions in upland grazing pressure, allowing combustible vegetation to accumulate, and specifically contrasts a managed mosaic with extensive areas of ageing heather and dead *Molinia* grass.
<https://nationalsheep.org.uk/our-work/news/grazing-is-part-of-multi-prong-answer-to-severe-wildfires-says-nsa/>
- [15] About "83%" of the modelled build-up is attributable to the reduction in winter burning. MA England Fuel Load Model (attached), Summary sheet, burning contribution row.
- [16] About 11,400 ha of English upland vegetation was burned around 2000 (extrapolated from a 2% sample). Yallop et al, "The extent and intensity of management burning in the English uplands", *Journal of Applied Ecology*, 2006, 43, 1138-1148, see Abstract / Results:
<https://besjournals.onlinelibrary.wiley.com/doi/abs/10.1111/j.1365-2664.2006.01222.x>
- [17] English moorland burning fell to "1,859 ha" in 2021/22, "73% lower than the average of the four previous years". Shewring et al, "Annual extent of prescribed burning on moorland in Great Britain", *Remote Sensing in Ecology and Conservation*, 2024, see Results (England):
<https://zslpublications.onlinelibrary.wiley.com/doi/10.1002/rse2.389>
- [18] Burning restrictions extended to "676,628 hectares" of deep peat from September 2025. Defra press notice, 9 September 2025: <https://www.gov.uk/government/news/burning-banned-on-englands-deep-peat-to-protect-wildlife>
- [19] Higher atmospheric CO₂ concentrations can stimulate plant growth. See Zhu et al., *Nature Climate Change* (2016): <https://www.nature.com/articles/nclimate3004>. The MA model applies no separate uplift for this effect; see the Calculations Inputs sheet.
- [20] Younger, live heather holds around 90% moisture (measured as a share of dry weight) in the growing season. MA England Fuel Load Model (attached), Calculations Inputs sheet (moisture parameters).
- [21] Dead heather holds only about 15% moisture (share of dry weight) in dry spells. MA England Fuel Load Model (attached), Calculations Inputs sheet (moisture parameters).
- [22] Heather ignites readily below about 60% moisture (share of dry weight). Davies, G.M. and Legg, C.J. (2011), "Fuel moisture thresholds in the flammability of *Calluna vulgaris*", *Fire Technology*, 47(2), 421–436. The study identified a critical fuel-moisture threshold of approximately 60–70% in the lower canopy: <https://doi.org/10.1007/s10694-010-0162-0>, applied in the MA England Fuel Load Model (attached), Calculations Inputs sheet.
- [23] On the hottest days dead heather moisture falls to about 5% (share of dry weight): "that is tinder". MA England Fuel Load Model (attached), Calculations Inputs sheet.
- [24] Since 2005 the flammable dead fraction has grown about "74%", to more than 1.6 million tonnes, with the dead share of deep-peat heather rising from about 20% to 34%. MA England Fuel Load Model (attached), Calculations Heather, Calculations Grass and Calculations Deep Peat sheets.

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- [25] Defra advocates cutting (mowing) as an alternative to burning. Defra, "Heather and grass burning in England" consultation outcome, Government response, see section on cutting:
<https://www.gov.uk/government/consultations/heather-and-grass-burning-in-england/outcome/summary-of-responses-and-government-response>
- [26] Cutting on deep peat and SSSIs is now restricted and subject to consent. Heather and Grass Management Code 2025, GOV.UK, see "Cutting" section:
<https://www.gov.uk/government/publications/heather-and-grass-management-code/heather-and-grass-management-code-2025>
- [27] Mowing can "leave a dry layer that actually encourages the spread of fire", whereas burning "is by far the most effective because it removes a fuel in its entirety". Scottish Fire and Rescue Service evidence, Muirburn Bill hearings, June 2023, reported by GWCT:
[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/)
- [28] Royal Commission into National Natural Disaster Arrangements, *Report* (October 2020), Chapter 18, recommendations 18.1 and 18.2. The Commission recommended that governments engage further with Traditional Owners and explore opportunities to use Indigenous land and fire-management knowledge in strengthening natural-disaster resilience: Australian Government
<https://www.royalcommission.gov.au/natural-disasters>
- [29] California Wildfire and Forest Resilience Task Force, *California's Strategic Plan for Expanding the Use of Beneficial Fire* (March 2022). The plan sought to expand prescribed fire, cultural burning and managed fire to as much as 400,000 acres annually: California strategy,
<https://wildfiretaskforce.org/wp-content/uploads/2022/05/californias-strategic-plan-for-expanding-the-use-of-beneficial-fire.pdf>
- [30] California subsequently continued to remove barriers to prescribed and cultural burning and expand its use as a tool for reducing catastrophic wildfire risk: California Governor's Office,
<https://www.gov.ca.gov/2025/12/29/heres-everything-so-far-governor-newsom-got-done-in-the-year-that-would-not-end/>
- [31] European Commissioner Hadja Lahbib stated that active management of high-risk areas through measures including grazing and controlled burning "can greatly reduce the risk of future fires". European Commission, 8 September 2025: European Commission speech,
https://ec.europa.eu/commission/presscorner/detail/en/speech_25_2056
- [32] Executive Order 14308 directed US federal agencies to consider modifying or rescinding rules and policies impeding "appropriate, preventative prescribed fires". White House, 12 June 2025, section 4(a): Executive Order, <https://www.whitehouse.gov/presidential-actions/2025/06/empowering-commonsense-wildfire-prevention-and-response/>
- [33] The G7's Kananaskis Wildfire Charter included Indigenous land-management practices, including cultural or controlled burning, among the scientifically grounded measures available to reduce extreme-wildfire risk. The Charter presents burning as one component of an integrated approach rather than a universal solution: Kananaskis Wildfire Charter,
<https://www.pm.gc.ca/en/news/statements/2025/06/17/kananaskis-wildfire-chart>
- [34] Defra, *Heather and Grass Burning in England: Consultation Document* (March 2025), p.7, stating that the proposed changes would bring England "more in line with Scotland".

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- [35] Scottish Government, *Wildfires: Strategic Action Plan* (5 March 2026), “Land management plans and practices”. The plan states that muirburn can reduce fuel loads, create firebreaks and make “a significant contribution both to preventing and reducing the risk of wildfires”. It also records the licensing and training requirements intended to reduce the risk of muirburn escaping, while acknowledging that restrictions on peatland burning may increase wildfire risk through higher fuel loads: Scottish Government, <https://www.gov.scot/publications/strategic-action-plan-wildfires/pages/4/>
- [36] Estimated thousands of winter burns over deep peat in Scotland each year: about 1,900 ha burned annually (Spracklen 2023) divided by an assumed average burn of about 0.5 ha gives roughly 3,800 (plausible range 2,400-7,000); an estimate, not a count. Spracklen 2023: <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1002/2688-8319.12296> and RSPB mapping: <https://www.rspb.org.uk/helping-nature/what-we-do/influence-government-and-business/policies-and-briefings/mapping-of-moorland-burning-in-the-uk>
- [37] Defra’s licensing scheme permitted zero winter burns over deep peat in England. Moorland Association, EFRA Committee written submission, May 2026, para 47.
- [38] Alistair Carmichael MP, Chair of the Environment, Food and Rural Affairs Committee, letter to the Secretary of State for Environment, Food and Rural Affairs, “Managed burning licencing and wildfires”, 7 July 2026: <https://committees.parliament.uk/publications/54071/documents/301178/default/>
- [39] An All-Party Parliamentary Group on Wildfires has been established. Scarborough News, 24 June 2026: <https://www.thescarboroughnews.co.uk/news/environment/scarborough-and-whitby-mp-alison-hume-establishing-all-party-parliamentary-group-on-wildfire-prevention-8787222>
- [40] Government commits a “£47 million” package to peat restoration. GOV.UK, June 2026: <https://www.gov.uk/government/news/new-funding-boost-to-protect-englands-iconic-peatlands>
- [41] Defra calls rewetting “the best way” to tackle wildfire risk. Environmental Audit Committee, oral evidence, 4 March 2026, Q66: <https://committees.parliament.uk/oralevidence/17294/pdf/>
- [42] Natural England, “Natural England’s response to Defra’s consultation on heather and grass burning”, 3 October 2025: <https://naturalengland.blog.gov.uk/2025/10/03/natural-englands-response-to-defras-consultation-on-heather-and-grass-burning/>. Defra’s *England Peat Action Plan*, pp. 5 and 12, states that peatland should be restored “wherever this is feasible”; describes restoration as a process rather than a one-off intervention; and acknowledges that natural systems take time to recover: England Peat Action Plan: <https://assets.publishing.service.gov.uk/media/6116353fe90e07054eb85d8b/england-peat-action-plan.pdf>. Heinemeyer et al. conclude that rewetting should generally reduce fire risk but does not make peatlands “fireproof”; that climate, topography and existing site condition can limit its effectiveness; and that rewetting is unlikely to end the need for wildfire-related vegetation management. A. Heinemeyer et al., “Prescribed heather burning on peatlands: a review of ten key claims made about heather management impacts and implications for future UK policy”, *Mires and Peat*, 32 (2025), Article 12, p.7: <https://www.mires-and-peat.net/article/143335-prescribed-heather-burning-on-peatlands-a-review-of-ten-key-claims-made-about-heather-management-impacts-and-implications-for-future-uk-policy>
- [43] Defra says winter burning causes “damage” to peat. Defra Explanatory Memorandum to SI 2021/158, section 2.1: <https://www.legislation.gov.uk/uksi/2021/158/memorandum/contents>

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- [44] Sarah J. Baker et al., "Assessing soil heating beneath prescribed burns undertaken by teams according to the first UK vegetation fire standards", *International Journal of Wildland Fire*, 35, WF25224 (2026): <https://doi.org/10.1071/WF25224>. The NERC-funded study measured soil temperatures at a depth of 3cm and assessed fire severity during eight prescribed burns across the UK. The burns were undertaken by trained teams, under mild weather conditions and in accordance with prescribed-burning guidance. Organic-rich peaty soils and mineral soils received little heating, with mean maximum soil temperatures below 43.4°C, and the assessments found no below-ground organic-matter loss. The authors concluded that the underlying soils were not exposed to temperatures capable of directly damaging long-term carbon stores.
- [45] Andreas Heinemeyer, *Restoration of heather-dominated blanket bog vegetation for biodiversity, carbon storage, greenhouse gas emissions and water regulation: comparing burning to alternative mowing and uncut management* (University of York, 2023), Chapter 4, p.14: https://eprints.whiterose.ac.uk/id/eprint/194976/23/Peatland_ES_UK_10_year_final_Report_Jan_2023.pdf The ten-year study compared plots where heather was burnt, mown or left unmanaged across three blanket-bog sites in northern England. Burnt plots became significantly wetter over time, with mean water tables approximately 2cm higher, particularly during 2017-2021 and in winter. The University's report p.6, reports that average annual water tables in the unmanaged plots fell from about 11cm below ground level to approximately 13cm during the final three years, meaning that the peat became drier. https://eprints.whiterose.ac.uk/id/eprint/195295/1/Peatland_ES_UK_UoY_SHORT_SUMMARY_Jan_23.pdf
- [46] The National Trust states that it is rewetting Marsden Moor through hundreds of leaky dams, peat dams and annual planting of sphagnum moss: *Conservation on Marsden Moor*: <https://www.nationaltrust.org.uk/visit/yorkshire/marsden-moor/conservation-on-marsden-moor> University of Manchester researchers recorded six large wildfire events on the estate: 26 February 2019, 22 April 2019, 23 March 2020, 25 April 2021, 18 March 2022 and 23 March 2022. Gail Millin-Chalabi et al., *Informing Wildfire Management and Land Restoration Activities at the National Trust Marsden Moor Estate*, UK Wildfire Conference, November 2022.
- [47] Forestry England, "How Forestry England responds to wildfires". Forestry England states that it continues to use prescribed burning in selected areas to maintain and protect open forest habitat: <https://www.forestryengland.uk/responding-to-wildfires>
- [48] UK's wildfire scientists submitted there was "not sufficient evidence" for the further tightening. Belcher, Doerr, Kettridge and Gaston, NERC-funded consultation response, 2025, reported by MA: <https://www.moorlandassociation.org/post/defra-ignores-wildfire-science>
- [49] Defra told Parliament the Natural England review received "rigorous" peer review. Defra, Written Answer PQ 100702, 16 December 2025: <https://questions-statements.parliament.uk/written-questions/detail/2025-12-16/100702>
- [50] A reviewer admitted he could not "pretend to have read it end to end". Environmental Audit Committee, oral evidence, 18 March 2026, Q49: <https://committees.parliament.uk/oralevidence/17294/pdf/>
- [51] Defra now says mistakes in the review are "matters for Natural England". Defra, Written Answer PQ 115270, 23 February 2026: <https://questions-statements.parliament.uk/written-questions/detail/2026-02-23/115270>

Moorland Association members manage more than one million acres of heather moorland across England and Wales. Drawing on practical experience, innovation and research, they work to conserve these internationally important habitats for wildlife, communities and future generations.



The Moorland Association

- [52] The NFCC warned the legislation would increase the danger to "firefighters and the public". NFCC consultation response, May 2025, p3: <https://nfcc.org.uk/wp-content/uploads/2025/05/250523-Heather-and-Grass-Burning-in-England-Consultation-Response-FINAL.pdf>
- [53] The meeting went unminuted due to an "administrative error". Defra, Written Answer PQ 115589, 24 February 2026: <https://questions-statements.parliament.uk/written-questions/detail/2026-02-24/115589>
- [54] A 2007 impact assessment warned that stopping winter burns would produce "a much-increased risk" of fires "very destructive over a large area". Defra impact assessment for SI 2007/2003, para 30: https://www.legislation.gov.uk/uksi/2007/2003/pdfs/uksiem_20072003_en.pdf
- [55] The latest legislation was introduced without an impact assessment. Moorland Association, judicial review note, January 2026: <https://www.moorlandassociation.org/post/clarifying-recent-commentary-on-the-judicial-review>
- [56] Moorland estates invest heavily in fire-prevention equipment and are often first responders. Moorland Association, EFRA Committee written submission, May 2026, Annex B.
- [57] England had approximately 26% fewer full-time-equivalent firefighters in 2025 than in 2010: 30,601 compared with 41,632. Ministry of Housing, Communities and Local Government, FIRE101. <https://assets.publishing.service.gov.uk/media/692ec7b82a37784b16ecf84a/FIRE101.xlsx>
- [58] "Greater coordination across departments" is needed on wildfire. Climate Change Committee, Progress in Adapting to Climate Change, April 2025, p41: <https://www.theccc.org.uk/publication/progress-in-adapting-to-climate-change-2025/>
- [59] The NFCC calls for improved "joint working across different departments" on wildfires. NFCC Wildfires Position Statement: <https://nfcc.org.uk/our-services/public-policy/position-statements/wildfires-position-statement/>
- [60] Government decision-making on wildfires was described as "fragmented". Professor Ivan Stoianov (Grenfell Inquiry expert witness), EFRA written evidence, May 2026: <https://committees.parliament.uk/writtenevidence/167367/html/>

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