The Moorland Association

Protecting Moorland Communities from Wildfire: Moorland Association Evidence to the EFRA Committee

DRAFT for MA members - last updated 5 May 2026

The Moorland Association's (MA) central submission is that wildfire policy must shift from suppressing fires after ignition to reducing their severity before ignition. Climate change is increasing fire weather, but land management determines whether an ignition becomes a controllable surface fire or a landscape-scale emergency. Defra policy should support active fuel management through grazing, cutting, mowing, bracken and scrub control, rewetting where feasible and prescribed winter burning where appropriate. MA members manage around one million acres of upland moorland in England and Wales, including over 700,000 acres of the remaining heather moorland, much of it designated SSSI, SAC or SPA. They also maintain many of the landscapes, tracks, water points, trained staff and equipment on which rural wildfire prevention and response depends. Policy should build on that capacity rather than regulate it out of existence.

The MA asks the Committee to recommend: regional wildfire resilience planning; funded fuel-management and response capability; a statutory wildfire monitoring protocol; a Wildfire Severity Reduction Duty; and a formal cross-government delivery mechanism led by the existing Fire Minister and Defra.

Question 1: How can land management techniques be best used at a regional level to prevent and control wildfires whilst balancing the needs of different land users? What evidence-gaps are there and how can they be filled?

Wildfire prevention is fuel-led. Regional plans should map continuous fuels, steep slopes, peat soils, access, visitor pressure, rural-urban interface, water supplies, critical infrastructure and likely ignition sources, then agree a practical fuel-management plan with land managers, Fire and Rescue Services, Local Resilience Forums, National Parks, Natural England, water companies and local authorities.

Defra should end its restrictive, centrally imposed model and replace it with regional wildfire resilience plans, accredited land-manager training, proportionate permissions, a fast licensing route for public-safety fuel reduction, and outcome monitoring.

Question 2: What role do nature-based solutions, such as improving biodiversity and more resilient landscapes, have in the prevention and control of wildfires?

In the uplands, biodiversity and wildfire resilience are linked through vegetation structure. A varied mosaic of heather ages, wet flushes, grass, moss, grazed areas and managed firebreaks is both more ecologically diverse and less likely to carry a single high-intensity fire across a whole moor.

Defra should adopt a nature-based wildfire resilience standard for uplands. Every restoration or agri-environment plan should show how it will reduce wildfire severity and improve habitat condition, using measurable outcomes: lower fuel continuity, restored hydrology where feasible, peat protection, diverse vegetation structure, thriving ground-nesting birds, maintained access for fire response and lower probability of high-intensity wildfire.

Question 3: How best can Defra funding schemes be used to support land managers to adapt to the increased risk of wildfires?

Stewardship schemes should fund locally appropriate wildfire resilience, rather than incentivising passive fuel accumulation or destocking below fire-safe levels.

Defra should create a dedicated Wildfire Resilience Option, recognising that resilience depends on viable land-management businesses, not one-off capital works. It should pay for audited reductions in fuel continuity, trained staff, maintained firebreaks, accessible water supplies, fuel-load monitoring and joint plans with Fire and Rescue Services.

Question 4: What impact does the monitoring of wildfires have on our understanding of the causes and risks of these events in the UK, and how can this be improved? Are there international examples or best practices that can be used in a UK context?

Monitoring determines how government understands wildfire causes and risks. If wildfire data are incomplete, inconsistent or wrongly interpreted, government will misunderstand causes, underestimate risk and design policies that may make fires worse.

England already has the Fire Severity Index, which is useful for identifying exceptional fire-weather conditions and triggering restrictions on open-access land. But it is not a substitute for practical wildfire-risk management. It does not remove dangerous fuel corridors, maintain access routes, secure water points, integrate land-manager capability, or decide whether delayed fuel-reduction work should proceed. Fuel is fuel, flames are flames, and dangerous fuel continuity can be identified and managed before a definitional or indexing exercise is complete.

Monitoring must distinguish between ignition, spread and severity. Too much debate focuses on what started a fire, while too little attention is paid to why it became severe. Most ignitions are human, but the policy-relevant questions are: why did the fire spread, why was it hard to suppress, and why did it burn into peat or threaten homes? That requires data on fuel load, vegetation age,

fuel continuity, moisture, slope, wind, access, water supply, previous management and suppression decisions.

Monitoring should capture damage and cost, not just hectares burnt, including smoke exposure, carbon loss, peat involvement, water-company costs, agricultural losses, infrastructure disruption, biodiversity impacts and post-fire erosion.

England needs a statutory wildfire monitoring protocol that builds on the existing Fire Severity Index rather than duplicating it. It should be developed alongside immediate fuel-reduction action and link Fire and Rescue incident data, satellite burnt-area mapping, fuel-load surveys, land-manager records, health data, post-fire environmental assessments and operational risk maps.

Question 5: What resources and training do emergency services and local authorities need to respond to the increasing number of wildfires, particularly in rural and hard-to-reach areas?

In remote uplands, the earliest effective response often depends on gamekeepers, shepherds, farmers, estate staff, contractors and volunteers with vehicles, water bowsers, radios, access and practical fire experience. This privately funded capacity is maintained by active moorland management, including controlled winter burning, where many estate staff learn fire behaviour, suppression, communications, equipment use and team coordination. If policy makes that management uneconomic or impractical, Fire and Rescue Services will lose local intelligence, access, equipment and experienced support.

Fire and Rescue Services need dedicated wildfire capability, not merely general fire cover. The CCRA3 wildfire report warned that wildfire risk is not consistently reflected in Fire and Rescue Authority planning, and that where wildfire is not included in Integrated Risk Management Plans, services may lack wildfire-specific PPE and specialist training. It also noted that only a small proportion of services had made special provision for wildfire or climate-change-induced wildfire.

The first requirement is mandatory wildfire risk planning in every Fire and Rescue Authority, especially those covering uplands, heathlands, forests, national parks, water catchments and rural-urban interfaces. These plans should identify local fuel loads, access routes, water sources, high-risk visitor areas, vulnerable communities, critical infrastructure and local land managers who can assist.

Firefighters need specialist wildfire training, wildfire-specific PPE, off-road vehicles, portable pumps, water bowsers, drones, thermal imaging, hand tools and resilient communications. Public policy should integrate existing rural capability safely, not displace it.

Protocols should identify private equipment, access, tactical burning, liability, insurance, fireground entry, communications and post-fire recovery in advance, so land managers can assist Fire and Rescue Services without legal uncertainty during an incident.

Local authorities need prevention capacity, not just response capacity. They should work with land managers on access management, signage, temporary closures during extreme fire weather, barbecue and campfire enforcement, public communications, parking controls, visitor education and rapid reporting.

Defra and MHCLG should jointly fund a Rural Wildfire Response Partnership. It should provide practical training, specialist equipment, national mutual-aid standards, local wildfire plans, and accredited arrangements for gamekeepers, farmers, shepherds and estate staff to work safely with Fire and Rescue Services. The model should be prevention-led: reduce fuels before ignition, train together before the emergency, and use local knowledge before a fire becomes uncontrollable.

Question 6: What are the most effective activities for tackling the human causes of wildfire ignition, for example public engagement and campaigns? How can the UK Government best support the delivery of these activities at both a local and national scale?

Public campaigns are necessary, but they are not sufficient. Since almost all UK wildfires are caused by human action, accidental or deliberate, reducing risky behaviour must be central to wildfire policy.

Human ignition is not only a communications problem; it is a land-use and access-management problem. Public engagement must be tied to live fire-risk conditions, local fuel risk, visitor pressure and enforcement.

The government should support a single, national wildfire warning system, linked to the Met Office fire-risk products and used consistently by government, fire services, local authorities, land managers, national parks and broadcasters. The 2021 Wildfire Framework already gives the Met Office and Natural Hazards Partnership responsibility for risk-monitoring products, including the Fire Severity Index and Daily Hazard Assessment, and previously gave central government and Defra roles in proactive public communications; those functions should now be reflected in a public-facing system led through MHCLG, Defra and the Met Office.

Messaging should be specific: no barbecues, campfires, discarded cigarettes, fireworks, parking on dry grass or spark-generating machinery during high-risk conditions. It should be delivered at the point of risk, including car parks, access tracks, visitor centres, weather apps, road signs, campsites and local media.

The government should ensure existing prevention powers are understood and used. Local authorities and national parks already have tools such as PSPOs, byelaws, open-access restrictions, parking controls, signage and enforcement powers. The problem is not usually the absence of powers, but the reluctance to use them early, consistently and visibly during high-risk periods. In MA members' experience, temporary restrictions on public access to open moorland are simply not

used, even during a severe wildfire, never mind before. That is a failure of local risk management. Public access is important, but during exceptional fire-weather conditions it must be balanced against public safety, firefighter safety, carbon protection, wildlife, farms and rural communities.

The UK Government should establish a National Wildfire Prevention Campaign combining warnings, behavioural rules, enforceable restrictions, ignition investigation and rapid alerts during extreme fire weather.

Question 7: What policies are in place, or are needed, to reduce the severity of wildfires and their socio-economic impacts on both agricultural land and at rural-urban boundaries?

Existing policy recognises wildfire as a growing risk, but does not yet control the severity of that risk. The missing policy is a duty to assess whether land-use decisions increase or reduce fuel continuity, fire intensity, peat ignition risk, smoke exposure, agricultural loss and danger to homes at the rural-urban interface.

Agricultural land needs a funded wildfire resilience package for farms and estates. This should include support for grazing, cutting, mowing, prescribed burning, bracken and scrub control, firebreaks, access tracks, water points, machinery-risk protocols during harvest and rapid reporting systems.

On moorland, policy should recognise that excluding traditional management can increase risk where it allows fuel to accumulate. Rewetting should be supported where it works, but cannot be the only policy. Severe fires that burn into peat release carbon, damage biodiversity, harm water quality and create long-term restoration costs. The CCRA3 report records that the Saddleworth Moor wildfire burned for over three weeks, affected over 18 km², consumed vegetation and organic soil, and emitted an estimated 36,720 tonnes of carbon, mostly from long-term losses from peaty soils.

At rural-urban boundaries, planning policy should require wildfire to be treated as a land-use risk, with defensible space, managed vegetation buffers, emergency access, water supplies, evacuation routes and long-term maintenance plans. A rural-urban interface fuel standard should prevent continuous unmanaged fuel from running directly into homes, roads, substations and other infrastructure.

The MA seeks a fast licensing route for fuel-reduction work where land managers, Fire and Rescue Services or Local Resilience Forums identify a public-safety risk. Applications should be time-limited, locally informed and subject to a clear appeal route, so urgent fuel reduction is not trapped in multi-year restoration negotiations.

Moorland managers in England are understandably frustrated because Scotland, drawing on broadly similar science and legal duties, continues to recognise licensed muirburn as a legitimate wildfire-

prevention tool, while English managers are increasingly prevented from using the same practice where local wildfire risk, terrain and fuel load make it the most practical option. That divergence is hard to reconcile with wider wildfire practice, which increasingly recognises prescribed burning, grazing, mowing and other vegetation-management tools as part of reducing dangerous fuel loads. Burning is not appropriate everywhere, but it should be assessed as one tool in a risk-based toolbox.

Defra and Natural England continue to argue that the English evidence justifies a uniquely restrictive approach, yet the evidence base is plainly contested. The post-Glaves review found that much of the newer evidence was inconsistent with earlier conclusions on carbon accumulation, dissolved organic carbon, water colour and Sphagnum abundance, and its independent peer-review statement emphasised uncertainty, inconsistency and the case for adaptive management rather than a one-size-fits-all rule. Defra should explain why English moorland managers are being denied a tool that Scotland, fire practitioners and wider international wildfire policy still regard as part of protecting peat, people and rural communities from severe wildfire.

Evidence transparency is essential. Where a Natural England evidence review, including NEER155, is used to justify restrictions on fuel management, the underlying scoring, reviewer comments, inclusion and exclusion decisions, peer-review records and audit trail should be disclosed. Land managers are being asked to accept restrictions that may increase fuel continuity and wildfire severity. They are therefore entitled to know how the evidence was assessed, what uncertainties were recorded, and whether contrary evidence was downgraded or excluded. In a field where the evidence base is uncertain and policy decisions carry public-safety consequences, unpublished assessment notes should never substitute for transparent, testable evidence.

This would not remove environmental safeguards; it would require wildfire risk, firefighter safety and smoke impacts to be weighed alongside habitat objectives before dangerous fuel loads accumulate.

Farms, estates and rural businesses need support for business-continuity planning and post-fire recovery, including soil stabilisation, reseeding, fencing, water protection and habitat recovery.

The government should introduce a statutory Wildfire Severity Reduction Duty across Defra, MHCLG, Cabinet Office, local authorities, Natural England and relevant public landowners. This duty should require policy decisions to assess whether they increase or reduce fuel loads, fire intensity, firefighter risk, smoke exposure, peat ignition, agricultural loss and risk to homes at the rural-urban interface.

Question 8: Given that responsibility is spread across government departments and bodies, for example Defra, Forestry Commission and MHCLG, how should the government coordinate a cross-departmental approach to tackle the increasing risk of wildfires?

England does not need another loose forum, statement of concern or non-statutory strategy. It needs an accountable wildfire governance structure covering prevention, land management, emergency response, public health, carbon protection and recovery.

The 2021 Wildfire Framework for England already recognises that wildfire is an increasing threat, that coordination is essential, and that responsibilities are spread across MHCLG, Defra, Cabinet Office, Fire and Rescue Services, the England and Wales Wildfire Forum, Regional Fire Groups, Local Resilience Forums, the Met Office and, potentially, UKHSA.

That division is logical on paper, but in practice wildfire has become a policy orphan. It is too environmental for fire policy, too much a public-safety risk for nature policy, and too cross-cutting for any single agency. MHCLG leads on fire response but does not control land management. Defra controls land-management policy but does not command Fire and Rescue Services. Natural England can shape decisions affecting fuel load, vegetation structure and emergency access, while having no direct statutory responsibility for wildfire response.

The problem is not a shortage of meetings, but the absence of authority: a place where decisions are made, trade-offs resolved, responsibilities assigned and delivery enforced. The Fire Minister should remain the national ministerial lead, but because the main levers for reducing wildfire severity sit partly in Defra policy and Natural England consents, that role needs a formal cross-government delivery mechanism.

Natural England illustrates the accountability gap. It can restrict or delay fuel management that reduces wildfire severity, while the practical risk is carried by Fire and Rescue Services and land managers. It has no statutory wildfire-response role and has no evident in-house specialist wildfire capability, yet its views can determine whether local wildfire-risk assessments become practical fuel reduction. Where it comments on or challenges such an assessment, the assessment should be reviewed by suitably qualified wildfire specialists, including Fire and Rescue Service expertise, and not treated solely as a habitat or peatland-management question.

The Peak District shows how this can obstruct delivery. Natural England was involved in a wildfire-risk project until its findings pointed towards the need for practical fuel reduction. Once those findings challenged Natural England's position, the assessment was reviewed by non-wildfire specialists and the project stalled despite an identified public-safety risk. If Natural England delays or prevents a fuel-reduction project, it should record the wildfire-risk consequences and identify an alternative capable of delivering equivalent risk reduction within the same timescale.

Defra risks operating in a policy bubble, in which peatland-restoration bodies, eNGOs and statutory advisers reinforce one another's assumptions while wildfire specialists, Fire and Rescue Services and working land managers are treated as consultees rather than co-designers. Peatland-restoration bodies may have valuable conservation knowledge, but wildfire prevention is not the same as peatland restoration. Where bodies receive funding for rewetting or restoration, their advice on wildfire policy should be treated transparently as potentially interested, not as neutral operational wildfire expertise.

This approach is consistent with the 2025 Corry Review of Defra's regulatory landscape. Although not a wildfire review, its conclusions apply: Defra regulation should focus on outcomes, proportionality, accountability and place-based dynamics, and environmental NGOs, while important, are not the only stakeholders. Applied to wildfire, Natural England consents and Defra land-management policy should be judged by whether they reduce real-world wildfire severity, not whether they preserve a preferred restoration model.

The government should therefore establish a statutory Wildfire Resilience Board for England, jointly chaired by the MHCLG Fire Minister and the Defra minister responsible for land management and nature recovery, with an annual report to Parliament. It should include the key departments, statutory agencies, Fire and Rescue leadership, Local Resilience Forum representation, National Parks, water companies and land-manager bodies. The Board should not duplicate existing wildfire groups or create another talking shop. Its role should be to make decisions, remove regulatory barriers and ensure prevention is treated as public safety.

Regionally, delivery should be led by those who manage the land. As Internal Drainage Boards show, local, practical, land-based risk management can be given statutory form where national agencies are too remote from day-to-day conditions. The government should create statutory Regional Wildfire Resilience Partnerships, built around land managers and Fire and Rescue Services, with relevant public bodies, water companies, Local Resilience Forums and community representatives as statutory partners and advisers.

Regional partnerships should prepare wildfire resilience plans, identify dangerous fuel corridors, agree access and water infrastructure, propose grazing, cutting, mowing, bracken control and prescribed burning where appropriate, and trigger a fast public-safety consent route for fuel-reduction work. This would not put land managers above public authorities or environmental safeguards. Public bodies should advise, scrutinise and ensure compliance, but those with the equipment, staff, local knowledge and day-to-day responsibility for the vegetation should be central to designing and delivering the plan.

Where a public body objects to a proposed fuel-reduction measure, it should give written reasons, identify the wildfire-risk consequences of refusal, and propose an alternative capable of delivering equivalent risk reduction within the same timescale. If agreement cannot be reached, it should be escalated to the national Board for decision or ministerial review.

The Board should publish a short statutory Wildfire Delivery Plan for England. This should apply a wildfire test to land-management policy, Natural England advice, consents, stewardship prescriptions and restoration plans, requiring decisions that increase fuel continuity, fire intensity, firefighter risk, smoke exposure, peat ignition risk or danger to homes and infrastructure to be recorded, justified and open to ministerial review. It should also create a national fuel-load and risk-monitoring system, set standards for wildfire training, equipment, land-manager integration and mutual aid, and establish escalation routes where fuel-reduction work is delayed despite an identified public-safety risk.

The case for reform should not depend on a fatal wildfire. Parliament should not wait for a coroner's report, public inquiry or major loss of life before acting on known risks. The Board, regional partnerships and statutory wildfire test should make government accountable before a catastrophe, not afterwards.

Success should mean practical delivery: fewer unmanaged fuel corridors, faster approval of public-safety fuel reduction, better integration of land managers with Fire and Rescue Services, improved wildfire data, clearer public warnings, and reduced risk to people, peat, biodiversity, farms and rural communities. Coordination should not mean more meetings about wildfire. It should mean fewer excuses for failing to reduce wildfire severity before ignition.