



Call for Evidence Response

The growing threat of wildfires

CLA response to EFRA Select Committee

Date: 18th May 2026

Introduction to the CLA

The Country Land and Business Association (CLA) is a membership association for those who own or manage rural land, business, and property. Our 25,000 members own or manage over half the rural land area in England and Wales, and their land management is a key determinant of wildfire risk. They also bear the brunt of responding to wildfires and paying for clear-up costs, so share the common goal of reducing their frequency and severity.

Key messages from our response

- Government policy needs to ensure all effective tools to control wildfires are available for land managers to use in contextually appropriate ways, including prescribed burning.
- Prescribed burning is effective at preventing wildfires and probably does not cause net environmental damage when evaluated holistically, accounting for avoided wildfire damage. Defra and Natural England's policies to de facto ban prescribed burning on England's upland deep peat are not supported by strong evidence.
- Rewetting landscapes gives them some resilience to wildfires, but it neither addresses all ignition sources nor overcomes the influence of extreme fire weather. Rewetting therefore complements but does not replace fuel-load management via grazing, prescribed burning, and/or mowing – the latter a generally suboptimal solution.
- Restricting active land management like prescribed burning means that private estates no longer have a management rationale to maintain the equipment, expertise, and personnel necessary to fight wildfires, and on-the-ground patrols for ignition sources are reduced.
- Improving cross-coordination between government departments on wildfire is unlikely to occur without changes to their statutory duties on wildfire prevention.

Role of land management in preventing and controlling wildfire

Managing land to reduce fuel loads is the main way that land managers can control wildfire risk. In absolute numbers, wildfires are more common in lowland and arable areas, but the largest and most severe occur in shrubby upland landscapes like heather moorland¹, which our response focuses on. Prescribed burning, grazing, and mowing are the main ways to reduce moorland fuel loads. Nature-based methods, including grazing, are covered in the next section.

Prescribed burning is a method of using limited, controlled fire to achieve a specific management objective, and is very different from wildfire². Wildfires in the UK burn peat,

¹ Belcher, C.M., et al., 2021. *UK wildfires and their climate challenges*: [Expert Led Report Prepared for the Third UK Climate Change Risk Assessment \(CCRA3\)](#)

² Ibid.

releasing centuries'-worth of buried carbon and other contaminants³, whereas well-executed management burns do not burn or significantly heat the peat⁴. Peatland wildfires were responsible for 90% of the UK's total fire-related carbon emissions between 2001 and 2021; controlled burns had comparatively negligible emissions⁵. Prescribed burns have been used for millennia as part of indigenous methods to reduce fire risk and create more productive landscapes⁶. Worldwide, they are recognised as essential in suppressing wildfires; for example, California's action plan on wildfires centres on prescribed burning⁷. Their use is endorsed in the G7 Kananaskis Wildfire Charter⁸, of which the UK is a signatory.

Natural England and Defra have criticised prescribed burning for worsening carbon emissions, reducing biodiversity, and harming water quality⁹ (although we note that Natural England's evidence review¹⁰ is more balanced than Defra's arguments). However, none of these objections are sustained when considering the available science, which is much more equivocal.

- **Carbon emissions:** There is no conclusive evidence that controlled burning causes net higher carbon emissions than other management across the full rotational burning cycle¹¹ when accounting for carbon locked in charcoal¹², the counterfactual of wildfires if unmanaged vegetation and peat combust¹³, and the higher photosynthetic rate of fire-rejuvenated heather¹⁴.

³ Baker, S.J., et al. 2025. Spikes in UK wildfire emissions driven by peatland fires in dry years. *Environmental Research Letters*, 20(3), p.034028. Graham, A.M., et al., 2020. Impact on air quality and health due to the Saddleworth Moor fire in northern England. *Environmental Research Letters*, 15(7), p.074018; McCarter, C.P., et al. 2024. Peat fires and legacy toxic metal release: An integrative biogeochemical and ecohydrological conceptual framework. *Earth-Science Reviews*, p.104867. Marcotte, A.L., et al. 2025. Potable water sources in a contaminated temperate peatland resistant to acute impacts but vulnerable to legacy effects of extreme wildfire. *Environmental Research: Water*.

⁴ Baker, S.J. et al., 2026. Assessing soil heating beneath prescribed burns undertaken by teams according to the first UK vegetation fire standards. *International Journal of Wildland Fire*, 35(3), p.WF25224.

⁵ Baker et al., 2025. Op. cit.

⁶ E.g., Lake, F.K., et al. 2017. Returning fire to the land: celebrating traditional knowledge and fire. *Journal of Forestry*, 115(5), pp.343-353. Hoffman, K.M., et al., 2022. The right to burn: barriers and opportunities for Indigenous-led fire stewardship in Canada. *Facets*, 7(1), pp.464-481.

⁷ State of California, 2021. [California's Wildfire and Forest Resilience Action Plan](#)

⁸ [Kananaskis Wildfire Charter, June 17 2025.](#)

⁹ E.g., Defra, 2025. [Heather and Grass Burning in England Consultation Document](#); Natural England, 2025. [Natural England's response to Defra's consultation on heather and grass burning](#)

¹⁰ Noble, A. et al., 2025. [An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water](#). Natural England Evidence Review NEER155.

¹¹ Heinemeyer, A. and Ashby, M.A., 2023. Prescribed Fire in UK Heather-Dominated Blanket Bog Peatlands: A Critical Review of "Carbon Storage and Sequestration by Habitat: A Review of the Evidence" by Gregg et al., 2021. *Fire*, 6(5), p.204.

¹² Heinemeyer, A., et al., 2018. Peatland carbon stocks and burn history: Blanket bog peat core evidence highlights charcoal impacts on peat physical properties and long-term carbon storage. *Geography and Environment*, 5 (2), e00063. Leifeld, J., et al. 2018. Pyrogenic carbon contributes substantially to carbon storage in intact and degraded northern peatlands. *Land Degradation & Development*, 29(7), pp.2082-2091.

¹³ Allen, K.A., et al. 2013. Matrix modelling of prescribed burning in *Calluna vulgaris*-dominated moorland: Short burning rotations minimize carbon loss at increased wildfire frequencies. *Journal of Applied Ecology*, 50, 614–624. Clay, G.D., et al. 2015. Carbon stocks and carbon fluxes from a 10-year prescribed burning chronosequence on a UK blanket peat. *Soil Use and Management*, 31, 39–51

¹⁴ Walker, T.N., et al., 2016. Vascular plants promote ancient peatland carbon loss with climate warming. *Global Change Biology*, 22, 1880–1889.

- **Biodiversity:** The UK's upland moorlands are largely fire-created habitats¹⁵. According to one review, “managed fire super-imposes or replaces [their] natural fire regimes and reinforces ecological processes that depend on fire disturbance”¹⁶. Fire-managed bogs are as rich in plant species, if not more so, than unburnt bogs, due to the mosaic of habitat niches created by rotating prescribed burns through the landscape¹⁷. Biodiversity is also protected from the devastating effects of wildfire¹⁸.
- **Water quality:** At least four reviews have found no conclusive evidence that controlled burning worsens dissolved organic carbon and discolouration¹⁹. In contrast, wildfires definitively pollute watercourses with ash, at an estimated £16 million per year cost for water companies²⁰.

Defra proposes that mowing is an acceptable substitute to prescribed burning, which we consider a premature conclusion. Research has found that cutting is at least six times more expensive than prescribed burning²¹; CLA members would put the figure considerably higher based on increases in labour and fuel prices since this research. During dry periods, the cut brash left on the surface of the moor is an ignition source, and does not decompose as quickly as excreted plant material from grazing animals. Mowing on steep slopes is generally impractical. Natural England's own review of cutting found “limited evidence” was available on cutting's overall impacts²². Cutting has negative environmental impacts like:

- removing tussocks and hummocks used by ground-nesting birds

¹⁵ Simmons, I. 2003 *The Moorlands of England and Wales: An Environmental History 8000 BC to AD 2000*. Edinburgh: Edinburgh University Press; Holden, J. et al., 2007. Environmental change in moorland landscapes. *Earth-Science Reviews*, 82(1-2), pp.75-100. Vandvik, V., et al., 2014. Management-driven evolution in a domesticated ecosystem. *Biology Letters*, 10(2), p.20131082. Blundell, A. and Holden, J., 2015. Using palaeoecology to support blanket peatland management. *Ecological Indicators*, 49, pp.110-120. McCarroll, J., et al., 2017. Application of palaeoecology for peatland conservation at Mossdale Moor, UK. *Quaternary International*, 432, pp.39-47

¹⁶ Davies, G.M., et al. 2016a. The role of fire in UK peatland and moorland management: the need for informed, unbiased debate. *Philosophical Transactions of the Royal Society B: Biological Sciences*, 371(1696), p.20150342.

¹⁷ Milligan, G., et al., 2018. Effects of rotational prescribed burning and sheep grazing on moorland plant communities: Results from a 60-year intervention experiment. *Land Degradation and Development*, 29, 1397–1412. Marrs, R.H., et al., 2019. Experimental evidence for sustained carbon sequestration in fire-managed, peat moorlands. *Nature Geoscience*, 12, 108–112. Table 28 in Noble, A., et al., 2025. *An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water*. Natural England Evidence Review, NEER155. Natural England.

¹⁸ Reid, N., et al. 2023. Impact of wildfires on ecosystems and bird communities on designated areas of blanket bog and heath. *Bird Study*, 70(3), pp.113-126. Messenger, S. and Hutchinson, C., 2025. [UK's rarest wildlife being 'pushed to extinction' by grass fires](#). *BBC News*.

¹⁹ Holden, J., et al., 2012. The impacts of prescribed moorland burning on water colour and dissolved organic carbon: A critical synthesis. *Journal of Environmental Management*, 101, 92–103. Chapman, S., et al. 2017. *Muirburn, peatland and peat soils: An evidence assessment of impact*. ClimateXChange Report, Edinburgh. Harper, A. R., et al., 2018. Prescribed fire and its impacts on ecosystem services in the UK. *Science of the Total Environment*, 624, 691–703. Williamson, J., et al. 2023. Reviews and syntheses: Understanding the impacts of peatland catchment management on dissolved organic matter concentration and treatability. *Biogeosciences*, 20, 3751–3766.

²⁰ Doerr, S. et al., 2021. *Impact case study (REF3) Enabling international land managers to mitigate water-contamination risks from wildfires*. <https://results2021.ref.ac.uk/impact/5e29301d-903b-40b0-bb23-947c21bcfd3f/pdf>

²¹ Heinemeyer, A. et al., 2019. *Defra Project BD5104. Restoration of heather-dominated blanket bog vegetation on grouse moors for biodiversity, carbon storage, GHG emissions and water regulation: comparing burning to alternative mowing and uncut management*. Defra.

²² Moody, C.S. and Holden, J. 2023. *The impacts of vegetation cutting on peatlands and heathlands: a review of evidence*. Natural England Evidence Review NEER028. Natural England, York.

- higher phosphorous inputs to the catchment compared to burning
- increasing sedge dominance
- soil compaction and rutting from machinery manoeuvring
- potentially increasing carbon emissions over the full rotation²³.

While cutting may be successful in some circumstances and reduce air pollution overall, it is risky to rely on it when prescribe burning – a proven, far less expensive technique that requires no government subsidy to deliver – is available.

Other land-management techniques like creating firebreaks, planting mixed species woodlands, and removing lodged and dead trees also help reduce wildfire risk.

Policy must leave all the tools in the toolbox, so that land managers trained in wildfire prevention can choose whichever is most suitable, while also contributing to their other objectives for the land.

Role of nature-based solutions to prevent and control wildfire

Restoring the ability of water to move naturally through fire-prone landscapes is an important route to prevent and reduce the severity of wildfires, but it has limits. Most semi-natural vegetation in the UK is resistant to burning when it has high live moisture. However, this ‘fire barrier’ reduces or ceases when severe droughts overpower the influence of moister soils and vegetation²⁴. Increasing the wetness of the landscape may delay this switch, but ultimately cannot outrun fire-prone weather.

In peat landscapes, rewetting may provide some resilience to wildfire²⁵, but it is not a panacea. As an expert report to the government noted, “raising the water table likely has minimal directly [sic] influence on ignitions and fire spread”²⁶. Rewetting only makes a difference on ignition “if high water table positions are retained even during periods of drying when summer fires will likely occur ... or [if] the development of protective moss layer results”. Unfortunately, peatland hydrology generally does not support the full, landscape-scale rewetting that would provide this safeguard against ignition, for the following reasons.

- There is mixed evidence for whether rewetting stabilises the water table depth year round, with some studies finding seasonal drops that represent ignition risks²⁷.
- Steep slopes, heavily eroded sites²⁸, and hummocks raised above the surrounding water table all resist rewetting and can become ignition hotspots.
- Many attempts to reintroduce the moss-layer via sphagnum planting projects have failed²⁹.

²³ Heinemeyer et al., 2019. Op. cit.

²⁴ Ivison, K., et al., 2025. Unprecedented UK heatwave harmonised drivers of fuel moisture creating extreme temperate wildfire risk. *Communications Earth & Environment*, 6(1), p.727. Nikonovas, T., et al., 2024. Vegetation phenology as a key driver for fire occurrence in the UK and comparable humid temperate regions. *International Journal of Wildland Fire*, 33(10), p.WF23205.

²⁵ Granath, G., et al., 2016. Mitigating wildfire carbon loss in managed northern peatlands through restoration. *Scientific Reports*, 6, 28498. Andersen, R., et al., 2024. Blanket bog vegetation response to wildfire and drainage suggests resilience to low severity, infrequent burning. *Fire Ecology*, 20, 26. IUCN Peatland Programme, 2024. *Wildfire resilience: why rewetting peatlands must play a key role* <https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2024-11/Wildfire%20Resilience.pdf>

²⁶ Belcher et al., 2021. Op. cit.

²⁷ For a summary, see: Ritson, J.P., et al., 2025. Climate change impacts on blanket peatland in Great Britain. *Journal of Applied Ecology*, 62(3), pp.701-714. For a study finding a water table drop, see: Holden, J., et al., 2011. Water table dynamics in undisturbed, drained and restored blanket peat. *Journal of Hydrology*, 402(1-2), pp.103-114 f

²⁸ Wentworth, J. 2022. *Reducing peatland emissions*. POSTnote 668. Parliamentary Office of Science and Technology, London.

²⁹ Peak District Moorland Group, 2025. [*The blanket approach is failing: an independent review into Sphagnum Inoculation on Peak District moors*](#).

- Research suggests that climate change will make it extremely difficult for sphagnum to grow in most of the UK's peatlands, even under ambitious climate mitigation, which questions the long-term viability of rewetting as a wildfire-prevention strategy³⁰.

In short, rewetting can only go so far in England's uplands to reducing wildfire risk. It is complementary to, but does not replace, fuel load management.

Grazing reduce fuel loads, create firebreaks, and can increase vegetation heterogeneity, all of which help to mitigate severe wildfires³¹. The consumption of vegetation removes flammable material, and speeds up its decomposition and incorporation into the soil via digestion and trampling. At appropriate rates, grazing and trampling increase structural complexity, which creates niche space for a wider variety of species and reduces the monoculture cover of highly flammable species like heather. Disturbances like grazing and trampling increase the variability in soil properties, which in turn changes the live fuel moisture content of the vegetation. These can act as firebreaks even without a visible break in the vegetation cover³².

While grazing can successfully confer resilience to wildfires, its intensity has been reduced in upland areas over the last few decades due to Natural England prescriptions and fewer commoners exercising their grazing rights. Sheep numbers have fallen³³. The Moorland Association estimates that the UK's upland's contain an additional 600,000 tonnes of vegetation due to reductions in sheep grazing³⁴. We acknowledge that grazing levels were probably too high several decades ago, but our members believe the reductions have been overdone for both biodiversity and wildfire control.

Some environmental groups have advocated a return to woodland on heather-dominated mineral soils as a way to suppress fire-prone shrub vegetation without using grazing or burning. While we feel this is a theoretically valid argument in some places, this approach brings a high fire risk in the 30-50 years while a closed canopy forms³⁵.

In lowland, agricultural, and forested areas, reducing fire incidence begins with restoring soil health and hydrological functioning, which forms a virtuous cycle³⁶. Soils richer in organic matter infiltrate and store more water, replenish aquifers, and buffer the year-round flows of groundwater into rivers. In turn, this supports moister vegetation and lush riparian vegetation – the former reduces ignitability and cools down the landscape through evapotranspiration; the latter acts as a firebreak. As on peatland, however, this mechanism has absolute limits. Where fire weather is extreme and exhausts the water plant roots can

³⁰ Ritson et al., 2025. Op. cit.

³¹ Pillar, V.D. and Overbeck, G.E., 2025. Grazing can reduce wildfire risk amid climate change. *Science*, 387(6730), p.eadu7471. Rouet-Leduc, J., et al., 2021. Effects of large herbivores on fire regimes and wildfire mitigation. *Journal of Applied Ecology*, 58(12), pp.2690-2702. Davies, K.W., et al., 2016. Winter grazing can reduce wildfire size, intensity and behaviour in a shrub-grassland. *International Journal of Wildland Fire*, 25(2), pp.191-199. Varela, E., et al. 2018. Payment for targeted grazing: integrating local shepherds into wildfire prevention. *Forests*, 9(8), p.464.

³² Little, K., et al. 2024. Landscape controls on fuel moisture variability in fire-prone heathland and peatland landscapes. *Fire Ecology*, 20(1), p.14.

³³ <https://ahdb.org.uk/news/england-s-cattle-and-sheep-populations-hit-record-lows-beef-and-lamb-market-update>

³⁴ <https://www.moorlandassociation.org/post/sheep-as-firefighters-why-grazing-is-essential-for-moorland-health>

³⁵ See support for this view from Fire and Rescue Service practitioners, pg. 14 -

<https://researchbriefings.files.parliament.uk/documents/POST-PN-0717/POST-PN-0717.pdf>

³⁶ Schwarzer, S., 2021. [Working with plants, soils and water to cool the climate and rehydrate Earth's landscapes](#). UNEP Foresight Brief

access, transpiration accelerates the drying of live fuels and soils, and increase wildfire risk³⁷.

Overall, the nature-based solutions described above play a complementary role to the active interventions discussed in the preceding section. They are mutually compatible options: returning more water to landscapes provides resilience, but does not prevent wildfires in the way that fuel management can. The CLA is concerned that government and some environmental groups view rewetting and other nature-based options in binary opposition to prescribed burning.

The role of government policy in shaping wildfire risk

Recent Defra's policy in England has *de facto* banned prescribed burning on any peat soils deeper than 30 cm, which we believe will worsen wildfire risk. The Heather and Grass etc. Burning (England) Regulations 2021, as amended in 2025, allow for prescribed burning to address wildfire impacts at ground 4(c). The main issue for practitioners in England is Defra's non-statutory policy governing when a licence will be granted.

Currently, Defra aims to only grant licences in exceptional circumstances, as a "last resort", "where absolutely no feasible alternatives exist"³⁸. Defra's press release on the 2025 amendment regulations announced a "ban" on burning³⁹, signalling the underlying policy intent. Applicants for a licence must show that burning – a rotational management tool – will be a one-time occurrence, which is very difficult to satisfy. In protected site areas, applicants must already have a Natural England consent, which is in practice impossible to achieve due to its definition of favourable blanket bog status that considers, by default, all blanket bogs managed by prescribed burning to be in unfavourable condition⁴⁰, regardless of their species assemblage. We are unaware of any applicants to whom Defra has granted licences for prescribed burning since it enacted the amendment regulations in September 2025. Satellite observations show that Defra's application of licencing since 2021 was associated with a 73% reduction in the area burnt⁴¹ (shallower peat is excluded from licencing, and prescribed burns on it are likely to have continued).

Correctly conducted prescribed burns do not burn or dangerously heat the peat layer⁴², so the depth of peat below the surface is immaterial to the suitability of prescribed burning as a management tool. Defra's decision to ignore any peat shallower than 30 cm, but to overregulate prescribed burning on any peat deeper than 30 cm is, at best, illogical. Correlational evidence from a study in Scotland found that 96% of wildfires in 2018 occurred outside the area subject to prescribed burning, which indicates its success as a management intervention, now restricted in England⁴³. Defra has not published an Impact Assessment on whether licencing under the 2021 Regulations for 40 cm peat achieved its policy aims.

Fire authorities, including the National Fire Chiefs Council, voiced their concerns about the increasing fire risk from this policy during the consultation phase⁴⁴, which Defra appears to have dismissed.

³⁷ Wu, H., et al., 2022. Elevated Wildfire and Ecosystem Carbon Loss Risks Due to Plant Hydraulic Stress Functions: A Global Modeling Perspective. *Fire*, 5(6), p.187.

³⁸ Defra, 2025. [Heather and Grass Burning in England Consultation Document](#)

³⁹ Defra, 2025. [Burning banned on England's deep peat to protect wildlife](#)

⁴⁰ Crowle, A. et al., 2025. [Definition of Favourable Conservation Status for Blanket bog. RP2967](#)

⁴¹ Shewring, M.P., et al. 2024. Annual extent of prescribed burning on moorland in Great Britain and overlap with ecosystem services. *Remote Sensing in Ecology and Conservation*, 10(5), pp.597-614.

⁴² Baker et al., 2026. Op. cit.

⁴³ Fielding, D., et al. 2024. Limited spatial co-occurrence of wildfire and prescribed burning on moorlands in Scotland. *Biological Conservation*, 296, p.110700.

⁴⁴ NFCC, 2025. [Response to Heather and grass burning in England consultation](#)

The underlying policy guiding licencing decisions could be changed without any secondary legislation if Defra were so-minded. Scottish Government simplified its licencing application process after practitioners highlighted its unworkability and the wildfire risks. Defra could alter its licencing policy and achieve a substantial increase in wildfire prevention.

Reducing ignition

Action is needed at all levels to reduce ignition sources. Nationally, the UK government should ban the sale of disposable barbecues. Organisations including the British Mountaineering Council and Keep Britain Tidy⁴⁵ support this. Many supermarkets have voluntarily stopped selling disposable barbecues⁴⁶. Evidence from the New Forest indicates that controlling the local sale of disposable barbecues has considerably reduced outdoor fires⁴⁷. Local authorities can already create byelaws to ban the use of disposable barbecues on their land; however, the public do not consistently know or obey these injunctions, and the byelaw option is not available to private landowners. This makes control at source by banning the sale of disposable barbecues essential. Government can empower authorities like national parks to seasonally ban other fire sources like campfires via byelaws, which Scottish Government has already done through secondary legislation. Public Space Protection Orders can also be used to control ignition sources.

Patrolling for ignition sources is important. Some institutional landowners have capacity to employ conservation wardens who perform this role. On private estates, it is usually the gamekeeper or estate manager who patrols. Therefore, control of ignition sources depends on estates conducting sufficient, active land management for them to justify full-time employment of a gamekeeper role. Ending prescribed burning through government regulation will mean fewer land managers are employed, meaning fewer patrols in wildfire season to extinguish wildfire sources and a longer delay in responders reacting to incipient wildfires. The Fire and Rescue Service (FRS) depends on experienced moorland managers for their local knowledge, firefighting skills, equipment, and the training they provide to FRS staff, which are likely to be lost if they can no longer conduct prescribed burns. These factors mean that restricting prescribed burning is likely to cause a greater number of larger, more severe fires⁴⁸.

Reducing capacity and vigilance is especially dangerous because of the increasing recreational pressure in the uplands, and an expected doubling of days in the UK with 'very high' fire danger at 2°C of global warming⁴⁹. Government policy that embraces prescribed burning would have a more holistic effect on prevention than just via fuel load management.

Public education about wildfire risk is also necessary, but we do not have expertise to advise on what this should entail.

Cross-government coordination on wildfire risk

In England, wildfire policy is not joined up in the exercise of statutory functions, which creates major problems.

MHCLG holds statutory duty for wildfire suppression but not prevention. Defra holds responsibility for the land management policy needed to prevent wildfires, but it only has a

⁴⁵ <https://thebmc.co.uk/en/no-moor-bbqs>;

<https://committees.parliament.uk/writtenevidence/128278/pdf/>;

⁴⁶ <https://www.cla.org.uk/news/cla-calls-for-immediate-ban-on-sales-of-disposable-barbecues/>

⁴⁷ <https://www.newforestnpa.gov.uk/enjoying/visiting-responsibly/no-fires/bbq-free-new-forest/>

⁴⁸ Denny, S., 2025. *Wildlife Warden, Conservation Manager, Fire Fighter, and Educator: The Grouse Moor Gamekeeper in England in the Twenty-First Century*

<https://static1.squarespace.com/static/626ace9887c48e711b909618/t/681a367daca3da3f89f931b0/1746548353060/GrouseMoorGamekeepersReport.pdf>

⁴⁹ Perry, M.C., et al. 2022. Past and future trends in fire weather for the UK. *Natural Hazards and Earth Systems Sciences*, 22, 559–575.

statutory duty to prevent wildfires insofar as they compromise its ability to meet biodiversity or climate targets. The change in ground 4(c) of the Heather and Grass (etc.) Burning (England) Regulations 2021 via the 2025 amendment from 'wildfire risk' (prevention) to 'wildfire impact' (mitigation on species and climate) highlights Defra's limited legal responsibility. In turn, Defra relies on Natural England to assess the biodiversity impacts of its upland management policies. Natural England has no statutory duty to consider wildfire prevention when providing expert advice, and does not have a wildfire prevention expert for this reason, even though large wildfires can be devastating for biodiversity. The technical nature of scientific evidence gives Defra Ministers and Natural England a wide margin of appreciation over appropriate policy responses, even when their policies contradict the advice from fire and rescue services. As far as we can tell, MHCLG does not have any veto power over Defra's land-management policies where these increase wildfire risk.

In the CLA's view, the above situation is unacceptable because it means there is no statutory obligation to design land management policies to minimise wildfire risk. Cross-coordination on wildfire risk is theoretically in place already via the Wildfire Framework for England (2021), section 3.3.7 of which requires Defra to "encourag[e] sustainable land management practices that mitigate against wildfire risk". However, the structural, statutory barriers described above need to change for improved cross-coordination to be possible in practice, particularly when departments make trade-offs against their other statutory objectives.