



CFOA
Chief Fire Officers
Association

The professional voice of the
UK Fire & Rescue Service

Chief Fire Officers Association
9-11 Pebble Close
Amington
Tamworth
Staffordshire
B77 4RD

Telephone +44 (0)1827 302300
Fax +44 (0)1827 302399

Mr Andrew Sells
Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield
S3 8NH

23 July 2014

Dear Andrew,

Chief Fire Officers' Association (CFOA) Wildfire Group position on prescribed burning

Although we are aware that the consultation period for responses to the Natural England Evidence Review Reports *Restoration of degraded blanket bog* (NEER003) and *The effects of managed burning on upland peatland biodiversity, carbon and water* (NEER004) closed some time ago, CFOA Wildfire Group are keen to provide feedback from a Fire and Rescue Service perspective with regard to prescribed burning. For future Natural England consultations, CFOA Wildfire Group would be grateful if we are included as a consultee to allow early feedback to be given and for our views, whenever they may be submitted, to be considered at the appropriate stage of the consultation. I would be happy to act as the point of contact for future consultation exercises.

It may be worth highlighting the CFOA Wildfire Group's definition of a prescribed burn in case it differs from that more widely used within the land management and land protection community. For Fire and Rescue Service (FRS) purposes, a prescribed burn is 'a planned and supervised burn carried out under specified environmental conditions to remove fuel from a predetermined area of land and at the time, intensity and rate of spread required to meet land management or FRS objectives'.

The CFOA Wildfire Group, meeting of 25th June, discussed the Natural England view that 'whilst there are acknowledged gaps in the evidence there is a growing evidence base that on balance suggests that any positive benefits from burning are outweighed by negative impacts...'. The Group have concerns that without the ability to utilise prescribed burning and a future increased reliance on alternative fuel management systems such as cutting, swiping and grazing, fuels would be much more likely to accumulate continuously across the landscape and any fires within them would inevitably increase in intensity to a point where they may exceed the FRS capacity to extinguish or contain them. The resulting large spatial incidents can be complex operational environments that can threaten key infrastructure, domestic and commercial property and areas of land with special cultural and environmental protection status.

It is our view that landscapes which are shown to be more resilient to wildfire are those on which the vegetation is most effectively managed and where the quantities of fuel are reduced, or the continuity broken to ensure that wildfires burn with less intensity and their spread can be more quickly contained within predetermined boundaries.

CFOA Wildfire Group recognises that the benefits which FRS receives from the use of prescribed burning may not be immediately evident outside the fire service sector and were probably not communicated during the consultation process. In order to remedy that position, the consensus of the CFOA Wildfire Group was;

- Prescribed burning is a vital tool for the management of fuel loading and is considered by Fire and Rescue Services (FRS) to be a critical component of their wildfire prevention plans.
- The tactical use of fire is increasingly being used by FRS to manage and suppress wildfires through defensive and offensive burn operations; it is therefore essential that FRS personnel are able to train effectively to maintain their skills.

- Increasingly, FRS are working in partnership with local land managers to assist with the planning and execution of prescribed burning. This has a number of significant benefits for FRS, namely;
 - Improved interoperability and liaison with land managers and rural partners.
 - Greater awareness of specific environmental and ecological risks and protection areas within their sphere of response.
 - Improved development of FRS tactical Fire Plans
 - FRS personnel are able to maintain competency for the use of tactical burning through collaborative burn programmes.
 - FRS are able to assist in the identification of areas of high fuel loading which may present specific FRS operational risks which may not have been considered by land managers or rural partners.
- Other alternatives to prescribed burning for the management of fuel loading are not considered to be as effective in delivering the outcomes required by FRS.

Whilst I appreciate the draft guidance only relates to deep peat and does not apply everywhere, there is a potential danger in our view that the efforts to restrict prescribed burning may ultimately spill over from deep peat onto other dry heath habitats. Needless to say, this is something that CFOA Wildfire Group would also be opposed to. CFOA Wildfire Group would not be supportive of a reduction, or cessation, of prescribed burning activity and believe there to be a strong argument for some burning operations to be held outside of the current prescribed periods. Areas where we would be grateful for additional dialogue with Natural England in relation to a flexible approach to the granting of derogation licences are for training and research and the management of high risk fuel loading during periods of weather which present a significant risk of wildfire ignition. We understand that the current position in Scotland is more flexible in terms of approvals for training and research outside the prescribed burn periods.

I am aware that Shaun Walton and Steve Gibson – colleagues on the CFOA Wildfire Group – have attended the Abbeystead events and have already appraised you of some of the issues listed in this letter; I hope you found this to be useful.

The principles behind FRS support for prescribed burning lie in our belief that it significantly supports firefighter and public safety during wildfire events; assists in managing fuel risk to ensure that any ignition has less likelihood of developing into a major fire; enables more effective use of FRS resources; provides for reduced risk of wildfire development and more effective fire suppression and supports co-operation, collaboration and interoperability between FRS and land management and rural sector partners.

If you require any further clarification, please do not hesitate to contact me and I would welcome the opportunity to meet in person to discuss the CFOA Wildfire Group position in more detail.

Yours sincerely



Paul Hedley
CFOA Lead Officer - Wildfire

Cc:

Ian Fulger - Director of Land management, Natural England
 John Barrett – Head of Uplands, Natural England
 Simon Thorp – Director, The Heather Trust and Vice-Chair of the EWWF
 Amanda Anderson – Director, The Moorland Association
 Mike Rowe, Deputy Director Sustainable Land and Soils, Defra
 Alex Bennett – Chairman, England and Wales Wildfire Forum (EWWF) and CFOA Wildfire Lead