

## Response ID ANON-HBRR-51QW-V

Submitted to Heather and Grass Burning in England  
Submitted on 2025-05-23 17:10:23

### Introduction

#### Confidentiality Question

1 Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason(s) :

#### Using and sharing your information

#### About you

1 What is your name?

Name:  
Angus Collingwood-Cameron

2 What is your contact email or postal address?

Contact:  
aecc@nrpg.co.uk

3 In what capacity are you responding to this consultation? (Select all that apply)

Landowner, Land manager (Farmer/private/estate), Organisation\*

\*Please specify:  
Northern Farmers and Landowners Group

### Part A - Proposed amendments to The Heather and Grass etc. Burning (England) Regulations 2021

#### Area protected under the Regulations

A1 Do you agree with the proposal to change the boundaries of the Regulations to LFA to protect more upland peatlands?

Please provide reasons why. (Please limit your response to 250 words) :

No. The consultation response seems to totally ignore the risk of wildfire, which has the potential to do a great deal more ecological damage to upland areas, including releasing vast amounts of stored carbon, than controlled burning ever will. The current regulations only came into force in 2021. Since then there have been two record years for wildfires across the UK. 2022 saw a very hot dry summer result in a record summer wildfire season. The warm, dry spring of 2025 has created a record spring wildfire season across the UK. These two events provide a perfect opportunity to evaluate what role upland vegetation mass (ie fuel load) is having in the occurrence and severity of wildfires. This could provide the opportunity to devise a science based upland management strategy to minimise the risk of ecological disaster and large scale carbon release which can result from large, deep seated wildfires. Further more, the 20 year research project currently being conducted by the University of York recently (2023) published its mid term findings. These demonstrated some considerable benefits of burning and highlighted the need for all management options to be available to upland land managers. The proposals appear to totally ignore this research which undermines their credibility.

A2 Please use the box below to provide your thoughts, if any, on the proposal to remove protection from those SSSIs that fall outside of the LFA.

Please provide comments. (Please limit your response to 250 words) :

Yes. The proposal does seem a bit odd, but it is appreciated that SSSI's are covered by their own set of regulations. Freed from a "one size fits all" regulatory approach to vegetation management, those charged with looking after the SSSIs can do what is best for individual sites. However, with no information provided on the area os SSSIs affected by this proposal, it is hard to know if it is relevant or not.

#### Depth of peat protected

A3 Do you agree with the proposed change of the prohibition of burning on peat 'over 40cm deep' to peat 'over 30cm deep'?

No

Please provide reasons why. (Please limit your response to 250 words):

Please see my response to A1. The same applies here. The proposals ignore the risk of wildfire, ignore the best available science and do not allow time to evaluate the 2022 and 2025 wildfire seasons.

## Grounds to apply for a licence to burn under the Regulations

A4 Under what ground(s) would you be most likely to apply for a licence to burn?

(Please limit your response to 250 words) :

I am not very likely to do so. It is very hard to see how extending regulation and expanding the licencing regime is compatible with the recommendations of the Corry Review. This whole approach seems to again ignore the results of the York research that demonstrates that all options should be open to land managers and that burning should not be viewed as a "last resort".

A5 Do you agree that ground '(d) because the specified vegetation is inaccessible to mechanical cutting equipment and any other method of management is impracticable' should be removed?

No

Please provide reasons why. (Please limit your response to 250 words):

If vegetation is inaccessible to, or inappropriate for, mechanical cutting and needs managing for any of the reasons listed in the 2021 Regulations, then burning remains the only feasible alternative and needs to be retained as a management tool for which an application for a licence can be made.

A6 Do you agree with adding 'research' as a ground to apply for a licence under the Regulations?

Yes

Please provide reasons why. (Please limit your response to 250 words) :

I find it rather ironic that this is included in the consultation when every effort appears to have been made to ignore the existing research. It can but be hoped that a more enlightened approach will one day prevail when policy makers will take heed of research so it is important that licences are issued for this purpose, if such an unnecessary regime is to be implemented.

## Mandatory compliance with the Heather and Grass Management Code (2025)

A7 Would you support a move to link the revised Heather & Grass Management Code to the Regulations, making it compulsory to follow rather than advisable?

No

Please provide reasons why. (Please limit your response to 250 words) :

The Heather and Grass Management Code (2025) has not yet been published, and without studying its contents it is not possible to determine whether compliance with the revised Code should become mandatory

## Mandatory prescribed fire and wildfire training

A8 Would you support a move to make it a requirement to complete an accredited training course prior to burning under a licence granted under the Regulations?

Yes, for supervisory practitioners only

Please provide reasons why. (Please limit your response to 250 words):

Safe and successful burning requires a flexible approach so that risks can be minimised and the best conditions utilised. A requirement for all participants to be licenced may not really be practical as burning teams often include very part time volunteers. Licenced participants may not be available when the opportunity to burn arises. Such a requirement could also jeopardise initiatives such as joint burning with FRS personnel. If training was to be mandatory for all, who would provide it? Here in Northumberland, training initiatives are instigated through the Wildfire Group and delivered by FRS personnel. Capacity is always an issue and it is unlikely that this would be a source of additional training without additional funding. Would other skilled trainers be available? Would there be "Grandfather rights"? With out such an approach, we could have the farcical situation of people that have been burning all their working lives being trained by people who have read about it in a book. The whole system would be discredited.

## Part B – Application process

### Application process

B1 Are you aware of the Regulations and what they cover?

No

Please provide any relevant details. (Please limit your response to 250 words):

N/A

B2 Do you know where to access the guidance and application form to apply for a heather and grass burning licence from Defra?

Yes

Please provide any relevant details. (Please limit your response to 250 words) :

N/A

B3 Have you attempted to or considered making an application for a Heather and Grass burning licence under the Regulations?

N/A

If Yes, please give details of your experience. (Please limit your response to 250 words) :

B4 If you have attempted or considered applying for a licence but didn't submit one, what prevented you from doing so?

Not Answered

Please give further details. (Please limit your response to 250 words):

B5 Would you find it helpful to have a combined Restoration / Wildfire Mitigation Plan template provided to support your application? This could provide a structure for applicants to follow, to help ensure that the necessary information required to assess their proposals was included in a single document.

Yes

Please provide any relevant details. (Please limit your response to 250 words) :

Here in Northumberland with our active FRS and Wildfire Group, I would expect anybody making an application to have such documents to hand.

B6 In your specific situation, if applying for a licence, who would be responsible for preparing and submitting the application?

Other

Please provide any relevant details. (Please limit your response to 250 words):

N/A

## Part C – Economic Impacts

### Economic Impacts

C1 Do you currently use burning as a land management tool?

No

C2 Where do you currently burn? (Tick all that apply)

None of the above

Please provide any relevant details, including peat depth if known (Please limit your response to 250 words):

## Part D - Further questions

D1 Do you have concerns about the impacts of burning on the environment?

Yes

Please provide details below. (Please limit your response to 250 words) :

Or rather, I have significant concerns about the environmental impact of further restricting controlled, cool burning of upland vegetation. Wildfires are increasing with climate change, and in the first four months of 2025 over 113 square miles of the UK was burnt, according to figures from the Global Wildfire Information System; more than the total for any year in more than a decade. The cool, low intensity controlled burning of vegetation on peatland, as carried out on moorland managed for grouse, reduces the fuel load and helps reduce the risk of wildfires that burn with greater intensity and can cause considerable environmental damage by burning into the peat. We are extremely concerned that any further restrictions on the use of controlled burning as a management tool can be expected to result in large areas of our uplands having increasing fuel loads, making them more susceptible to damaging wildfires. Although damage to the underlying peat can be reduced on areas of wetter moorland, that does not prevent the vegetation from being vulnerable to wildfire. Scotland's Flow Country, which is widely considered the most outstanding example of a blanket bog ecosystem in the world, was severely damaged by a wildfire in 2019 due to the vegetation becoming overgrown. This resulted in 700,000 tonnes of CO2 equivalent being released into the atmosphere, doubling the country's greenhouse gas emissions during the six days it burned. Despite claims to the contrary, further restricting areas of moorland where the use of cool controlled burning is permitted will not protect them. Neither will it help prevent smoke emissions and improve air quality, the impacts on which are considerably greater from uncontrolled wildfires.

D2 Have you been impacted in any way (positive or negative) by the use of burning as a land management method?

Yes

Please provide details below. (Please limit your response to 250 words) :

Here in Northumberland the ability of the private sector to undertake controlled cool burns means that our uplands are populated by people who are highly skilled and dealing with vegetation fires and have a considerable amount of equipment suitable for tackling fires in harsh terrain. Should a wildfire occur this well skilled and equipped workforce is available to assist FRS in limiting the impact of the wildfire. The cool burning operations in the uplands also create a network of fire breaks which can be used to help control wild fire. If cool burning is further restricted these skills and equipment will be lost from our uplands leading to a greater likelihood of devastating wildfire. Given the impact of climate change, which can be evidenced in the wildfire seasons of 2022 and 2025, it is imperative that upland vegetation is managed with the risk of wildfire in mind. This is not currently happening. In fact the reverse is happening. Grazing is being reduced, rewilding being encouraged, controlled burning is being restricted, skills and equipment are being lost. All these factors will contribute to more devastating wildfires in future years.