



Rt Hon Alistair Carmichael MP
Chair, EFRA Committee
House of Commons
London
SW1A 0AA

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Sent via email

10th July 2026

Dear Mr Carmichael,

I am writing following my appearance before your Committee on 23rd June for the inquiry into 'the growing threat of wildfires'. Natural England was glad to give evidence alongside the Peak District Moorland Group and the Game and Wildlife Conservation Trust. Please find attached the information I undertook to provide, which includes:

- The scientific evidence supporting the change in peat depth thresholds from 40cm to 30cm (as per the amended Heather and Grass Burning Regulations).
- Clarification around the scope of the NEER155 burning evidence review in terms of cutting and "non-management".
- Detail of learning around working with landowners and fire and rescue services, including the use of wardening and other actions.

I recognise the national importance of addressing the growing threat of wildfires, particularly as we start to experience more extreme weather events, and we are grateful to the Committee for taking the time to focus on this issue. It is in the public interest to have a full and balanced consideration of the issue. In that spirit I want to reiterate Natural England's position and to draw your attention to some elements that could not be covered during the Committee session, but which are relevant to the wider evidence base on this topic.

Natural England's Position

I wish to respond to the following statement from your closing remarks, that Natural England *"has set its face against burning and will hear no arguments to the contrary"*. This does not reflect the evidence I provided on the day or in our written submission, nor our broader approach to this issue. Defra's Regulations allow for managed burning, including to reduce the impact of wildfire, on land where peat depth is less than 30cm. Natural England supports a suite of land management techniques to mitigate against the threat and impacts of wildfire as appropriate to the site in question. We consider the relative risks and benefits of all management techniques equally considering the scientific evidence and broader context. As noted in our submission to the committee, land management alone cannot prevent wildfires from starting. However, it can be part of the toolkit to help reduce the risks and severity of fires.

The use of Wildfire Management Plans can help landowners/managers design and plan, at a strategic scale, what measures can be implemented to mitigate the risks of wildfires. Natural England encourages the use of these plans, which we use on our own at-risk National Nature Reserves, to strategically plan for wildfire risk, taking account of the needs of each site and the habitats present. We will work with MHCLG and Defra to further encourage and incentivise the use of strategic Wildfire Management Plans.

Evidence Review NEER155

Concerns were raised at the inquiry around our published evidence review NEER155. I would again like to provide assurances to the Committee that, like all Natural England Evidence Reviews, this study followed a PICO (Patient/Population, Intervention, Comparison, Outcome) methodology. This is a methodology for evidence-based practice that is also used in Cochrane Reviews and by the National Institute for Health and Care Excellence. During the session, a witness suggested that Defra had disowned the report. The Committee should note that that characterisation is wholly inaccurate.

Engagement with Communities

The suggestion that Natural England is unwilling to engage with upland communities does not reflect our experience. I spoke directly to the value of fire operations groups (including the Peak District FOG group, on which both Natural England and Richard Bailey sit) as collaborative forums bringing together land managers, environmental non-Governmental Organisations (eNGOs), landowners and Natural England. We take the concerns of upland communities seriously and are committed to continued engagement.

Other Representative Voices

I also wanted to note that the government department leads with lead responsibility for wildfire, MHCLG and Defra, were not represented at the hearing. If the Committee were to hold any follow up sessions, we would recommend inviting departmental representatives to address the policy and burning regulation-related questions directly. For example, Defra is the decision-maker for burning licence applications. Evidence from eNGOs and experts from a cross-section of disciplines would also provide a fuller range of perspectives, including practical experience and published research, on land management techniques for reducing wildfire risk.

Thank you for the opportunity to contribute to this important inquiry. Please do let me know if the Committee would like any further information or clarification on any of these points.

Yours sincerely,

Professor Sallie Bailey
Chief Scientist, Natural England

Supplementary information

1) Evidence that 30cm is superior to 40cm

Annex 1 of the [Definition of Favourable Conservation Status for Blanket bog](#) (RP2967) explains why the definition of blanket bog should use a peat depth of 30 cm. This is based on ecological factors, rather than the previous 40 cm or 50 cm depths that were originally derived from soil mapping classifications in the post-war period to support agriculture (including the exploitation potential of peat).

2) NEER155 did not include a comprehensive assessment on cutting, and it did not assess cutting versus non-management

NEER155 is an Evidence Review, which focuses on the effects of managed burning on upland peatland biodiversity, carbon and water. Therefore, by design, this review did not specifically examine in detail other land management practices. In some of the studies evaluated by the Evidence Review, burning was compared with alternative interventions including cutting, in which case the resulting evidence was included in the review.

In 2023 Natural England published a rapid evidence review on [The Impacts of Vegetation Cutting on Peatlands and Heathlands](#) (NEER028). This summarises the available evidence on the impacts of vegetation cutting. With regards to ‘cutting versus non-management’, NEER028 notes “*Where possible, we assessed the impact of cutting compared to unmanaged ‘control’ plots/areas: however, there is a dearth of such evidence.*” (p23).

3) Working with landowners and fire and rescue services, including the use of wardening and other actions

Please see our comprehensive written response to questions 8 and 9 of the call for evidence for the inquiry. This included evidence and practical examples of collaborative working and site-based interventions that have been shown to help tackle the human causes of wildfire ignition.

We also provided a rapid evidence review, undertaken by our social scientists, in Annex 2 of our submission. A key headline finding from this evidence review was the importance of localised, place-based wildfire prevention strategies rather than a ‘one size fits all’ approach.

In summary we recommend the committee considers the following recommendations to government:

- Providing funding for prevention-focused activities, including wardening, access management and other targeted interventions at high-risk locations and periods.
- Resourcing local partnerships (communities, local authorities etc) to deliver targeted interventions in high-risk areas under an agreed strategic Wildfire Management Plan.
- Investing in improved recording of ignition causes and prevention strategies to support the most effective responses over the long term.
- Ensuring communications across all Government departments and relevant stakeholders are aligned and consistent.
- Empowering local authorities to use all available regulatory tools, including PSPOs or by-laws to restrict barbecues or open fires during high-risk periods.