

## Exmoor National Park Authority comments on

### Best Practice Guide 7: Burning in the uplands of south-west England

1. The Authority recognises the importance of burning or swaling as an important component in the management of moor and heathland habitats within Exmoor National Park. This is a matter of considerable local concern and the Authority's comments are made after local discussion and consideration by the Authority at its meeting on 8 June 2010.

#### General comments

2. It is widely recognised that *“large and frequent agricultural burns..... are becoming less prevalent”* (paragraph 5). On Exmoor, our experience is that the number of controlled, authorised burns on heathland is in decline for a variety of reasons including
  - a lack of manpower to carry out managed burns (with fewer people working on farms),
  - loss of skills and knowledge as the older generation retire from farming,
  - a perception that the Heather and Grass Burning Code is too restrictive, and
  - fear that if the landowner loses control of the fire he or she could suffer very significant financial consequences (SPS / Code of Good Agricultural Practice)
3. This is meaning that much of the planned burning is not taking place, many moorland areas are becoming overgrown and the moors are more vulnerable to illegal burns which are becoming harder and more expensive to control and which occasionally cover extensive areas of land.
4. One of the specific problems is a general feeling amongst farmers and land managers that areas of 2ha or even 5ha are too small to be practical. We believe this restriction on the size of burns is one of the major reasons that regular controlled swaling has reduced on Exmoor. We believe that there are circumstances under which a land manager should be allowed to carry out controlled burns of over 10 hectares under a licence from Natural England. The unpredictability of the weather conditions directly affects the time when burning would be detrimental. We would welcome the opportunity to apply for derogation outside of the 1<sup>st</sup> October – 15<sup>th</sup> April window.
5. Rather than imposing further restrictions on the permissible size of burns we recommend that instead the size of burns should be based on the

desired cycle length for a particular site, which should in turn be based on the individual characteristics of that site. On smaller sites burn areas might be limited to 5ha, or even 2ha, in order to give the desired rotation length, while on larger sites it may be desirable to have larger plots of up to 10ha.

6. Cycles, in our view, should usually be between 8 and 10 years in length, again depending on the characteristics of an individual site and the climatic conditions affecting vegetation growth.
7. Whilst recognising that the south-west climate can effectively shorten the window of opportunity for swaling to take place, the revised draft 4.2 of the Best Practice Guide 7 does not seem to recognise the impact that the general shift in farming techniques, and particularly grazing regimes, has had and will continue to have on the moorland landscapes in the region. The predictions for a changing climate are also likely to favour greater vegetation growth with resulting succession to scrub, particularly when taken in conjunction with declining stock numbers. In turn, increasing vegetation and scrub leads to increased 'fuel' which is likely to present a greater a threat to life and property during wildfire events, especially if the periods of drought and higher temperatures increase. We therefore strongly believe controlled burning must have a key role to play in managing our future landscape.
8. There are three key issues that the Authority's staff have been raising with Natural England over recent years: (a) authorised burn plots are too small; (b) rotations are too long and moving toward shorter rotations would be better, and (c) just burning, or just grazing or just machine cropping are never going to be enough to actually maintain/retain the heather moorland, or to re-establish areas effectively 'lost' to other species such as purple moor-grass or gorse. We believe that ideally a combination of techniques should be adopted, and think it would be useful if the best practice guide made mention of that.
9. We are also of the view that it is better to look at each site on its own rather than looking at the region as a whole, as mentioned above. The nationwide guidelines show how hard it is to generalise across the whole country, and the variation within the south-west, and even within Exmoor, is just as wide. The number of factors that have a bearing on moorland management is immense, including aspect, height, vegetation type, grazing, surrounding trees, wildlife and management objectives for a site. Deciding on a long term plan for each site within the regulations could, in our view, be considered to be the most appropriate approach.
10. We believe there will be other benefits from an increase in controlled burning. We have had a number of complaints from the public about the increase in scrub, bracken and tall vegetation which is making it more difficult to walk and, where permitted, ride across open moorland. Swaling helps to keep these areas open and easier to access. Swaling also ensures that the historic environment is visible and enjoyed by the

public, although there may be occasions when this type of management is not suitable on archaeological sites (see below for details).

11. Finally, tick borne diseases appear to be a growing threat and, whilst we do not subscribe to the view that burning alone is sufficient to keep ticks in check, we do agree that a short sward height should help to reduce the negative impact of ticks. If moorland vegetation is allowed generally to become taller because burning is abandoned, then we believe the problems caused by ticks are likely to continue to increase.

### **Specific comments**

12. Para 2: *“Where grazing is insufficient to remove the litter, it is often burnt”*. It is not clear from the text whether this is good or bad practice. In our experience, the “traditional” practice has been to burn grass moor every year in order to remove the litter and encourage fresh growth. This was seemingly regardless of the amount of grazing, as the removal of all litter and fresh growth in such areas would take a huge amount of stock. This annual burning has led, in some cases, to the development of a monoculture of purple moor-grass with little species diversity. We suggest that you advise that if you are managing principally for nature conservation, the burning of purple moor-grass should generally be used as a one-off restorative technique followed up by other management such as cutting or grazing. (Work carried out by the Exmoor Mire Restoration Project has shown that cutting and baling of purple moor-grass, and removing it from the site, can result in greater species diversity and hence burning of these sites may not be necessary at all.)
13. Para 6: *“The south-west uplands are particularly rich in archaeological and historical features and management of these may sometimes take precedence”*. Please note that there should always be a presumption against burning across areas where prehistoric standing stones and later boundary stones occur, as the heat may cause fracturing of the stones. These sites should be excluded from burns by creating firebreaks. The control of vegetation at these sites should be achieved by means other than burning and should be approved by the local curatorial archaeologist. (Please also note that archaeological is spelt incorrectly in the Best Practice Guide).
14. Para 7, bullet point 2: *“Burns should not be larger than 5 ha and ideally not larger than 2 ha. (Burns larger than 10 ha would represent a breach of the revised Regulations unless carried out under a licence from Natural England)”*. As mentioned above we would question the scale of burns permitted on the SW uplands. We believe the restrictions on burn size is one of the key factors leading to a reduction in the number of people carrying out this type of management, which is in turn leading to an increased vulnerability to large, illegal burns. Ideally we would recommend burning a number of plots across a site to encourage stock to move from point to point, but believe that prescribing a maximum area just leads to an increase in mechanization as more fire breaks need to

be cut rather than following natural breaks in vegetation. In addition, lots of small burns sites makes it harder for a landowner/grazier to do the burning themselves. We believe it is far better to follow the natural breaks (tracks, slopes etc) as far as possible; this also leaves a far more natural appearance. A 2 hectare plot is so small many people are of the view that it is not viable to burn it, although this does depend on the individual site. We believe that as long as burns comply with the Heather and Grass Burning Regulations there should be no need for further restriction, and therefore recommend removing the reference to 2ha and 5ha burns in the SW guidance.

15. Para 7, bullet point 3: *“Burning in long narrow strips is not traditional practice on the south-west moors (though it may be beneficial for recolonisation by less mobile fauna and flora)”*. We recommend removing the bracketed text and instead making some recognition of the fact that such practice can have a negative visual impact.
16. Para 7, bullet point 4: *“Because of the diversity of dwarf shrubs and other species, including western gorse, and the frequency of purple moor-grass, no minimum heather cover is specified before burning heather and other heath (c.f. 50% heather cover recommended in the Code).”* We agree with this statement, although we would not recommend the regular burning of purple moor-grass as a moorland management tool where the objective is to diversify the vegetation and increase biodiversity.
17. Para 7, bullet point 5: *“Western gorse is a natural component of the western heath community and areas with this species should be managed as heath rather than as European (common) gorse scrub (which is treated differently in the Code).”* We agree with this statement.
18. Para 7, bullet point 7: *“In some circumstances, particularly on areas of dry/humid heath dominated by western gorse, it may be acceptable to ‘back burn’, and hence create hotter fires, to remove material and allow recolonisation.”* On Exmoor it is traditional rather than exceptional to ‘back burn’.