

## Appendix 2 – Consultation Report

### Wildfires Public Space Protection Order

#### The Title of the Public Space Protection Order

The proposed Public Space Protection Order (PSPO) was titled 'Moorland PSPO' by all three Local Authorities, and the consultation was conducted using this title. A representation was made to Bolton Council regarding the title, stating that it was misleading as only part of the Proposed Area within Bolton was moorland. Bolton Council have responded to this by changing the title from 'Moorland PSPO' to 'Wildfires PSPO'. In order to maintain consistency across the three Local Authority areas and prevent possible public confusion, this PSPO will also be titled 'Wildfires PSPO'.

#### Overview

The proposed Wildfires PSPO was sent out for consultation on 18<sup>th</sup> January 2023. Due to the scale of the area in which the order is proposed to be implemented, which shall be known as the Proposal Area, the consultation ran for four weeks, ending on 15<sup>th</sup> February 2023. Consultees included members, stakeholders, partner agencies and residents. As part of the consultation process, a questionnaire was uploaded to the Blackburn with Darwen Borough Council website, and those interested in the proposal were asked to share their views by completing the questionnaire. This was advertised by a press release in The Shuttle, and was shared on the Council's social media account. Notices outlining the proposal with QR codes linked to the online questionnaire were also placed around the boundary of the Proposal Area, so that members of the public could easily access the questionnaire.

#### Email Responses

A total of 17 emails were received in relation to the consultation. 16 were in support of the proposed PSPO. One email did not specify support for the proposed PSPO, nor did it criticise it; the email raised concerns about a communal fire pit, which is discussed in the 'Concerns Raised' section of this report.

The main phrases used in the supportive emails were "I support this initiative" and "I fully support this". Several Councillors emailed stating they are happy to provide their support to the proposed PSPO. One resident emailed stating "I am in full support of this as a resident of Darwen. I also agree that the more widespread it is the better for wildlife and conservation of the moors. It's heart breaking to see the fires on a more and more regular basis and action needs to be taken."

Blackburn with Darwen Borough Council's Principal Environmental Health Officer emailed stating that he fully supports the proposed PSPO because "in addition to the obvious safety and wildlife impact that moorland fires cause they also generate significant pollution and nuisance which will have an impact on local and regional air quality".

One of the main land owners of the land included in proposal area emailed stating he is fully supportive of the proposed PSPO. He did add that he would like consideration to be given to

including Moorland at Cranberry Moss, Cranberry Moor and Pickup Bank as they are similarly susceptible to wildfire. This suggestion was echoed by a local Councillor. This was raised at a multi-agency meeting comprising of a working group of partners who are working together to develop a response to the growing number of Moorland fires. The group agreed that it would be difficult to evidence the requirement for these additional areas to be included due to a lack of operational incidents and anti-social behaviour recorded for the locations. It was agreed that if the PSPO is implemented, the proposal area should not be altered at this stage. Should there be an uplift in activity elsewhere, evidence can be gathered, which can be used to support the introduction or amendment of any future PSPOs.

An email was sent by the Footpath Secretary of the Bolton Ramblers group. He attached a letter which he had sent to Bolton Council in relation to Bolton's consultation, which was dated 24<sup>th</sup> October 2022. The letter states that Bolton Ramblers are generally in favour of the suggestion to help prevent moorland fires however they raised a concern about the size of the Moors. The letter stated that only a third of the Moors lies in Bolton with the other two thirds being in Blackburn with Darwen and Chorley. The footpath Secretary requested that Bolton Council work in conjunction with Blackburn with Darwen Borough Council and Chorley Council in order to introduce an effective measure which does not suffer from any confusion over boundaries. This concern can be settled as all three councils are working in conjunction with one another in order to ensure the proposed PSPO would be identical across all three Councils. In his email to Blackburn with Darwen Borough Council, the Footpath Secretary stated that he had only just realised the greater extent of the proposal area, therefore he had included the Chairman of the Manchester and High Peak Area Ramblers as they may have a different perspective to himself: he stated that he could smell the moor fires, could see the flames and had first-hand experience of the damage caused. A reply was sent to all copied in to the email, explaining that the consultation would end on 15<sup>th</sup> February 2023, and that anyone who wishes to provide an opinion on the proposal could do so by sending a direct email if they did not wish to complete the online survey. There were no responses to this email, nor did anybody who completed the online survey identify themselves as a representative from the Manchester and High Peak Area Ramblers.

### Questionnaire Responses

The questionnaire consisted of a total of 9 questions as outlined below and we received 74 responses to the online survey. The results are as follows:

#### **Question 1: Do you agree with the proposed PSPO area?**

A total of 69 people agreed with the proposed PSPO area whereas 5 people disagreed. This means that 93% of responses were in favour of the proposal area. 60% of those who disagreed with the proposed PSPO area stated that they actually wanted the proposed area to be larger. Specifically, three of the responses asked for the area of Cranberry Moss, Cranberry Moor and Pickup Bank including within the proposal area.

#### **Question 2: How concerned are you about wildfires on this area of Moorland?**

A total of 63 people stated they were 'very concerned' whereas 10 stated they were 'concerned' and only 1 person stated they were 'not very concerned'. Therefore, 99% of people who completed the questionnaire were concerned about wildfires on this area on Moorland.

**Question 3: How effective do you think the proposed PSPO will be at preventing wildfires in this area of Moorland?**

A total of 48 people stated they think the PSPO will be 'effective' with a further 14 people believing the proposed PSPO will be 'very effective'. 9 people chose 'not very effective' and 2 people stated they had 'no opinion'. Therefore, combining the responses for 'effective' and 'very effective', 88% of people who completed the questionnaire believed the proposed PSPO would be effective in preventing wildfires.

The activities which are prohibited at all times by this order will be:

- i) The lighting of fires, barbeques, fireworks, Chinese Lanterns
- ii) Using any article/object which causes a naked flame which poses a risk of fire

**Question 4: Lighting a fire within the proposed area**

A total of 70 people chose 'strongly agree' with this prohibition, equating to 95% of responses. 1 person stated 'agree' and 3 people stated 'disagree'.

**Question 5: Lighting a barbeque within the proposed area**

A total of 70 people chose 'strongly agree' with this prohibition, equating to 95% of responses. 3 people stated 'agree' and 1 person stated 'disagree'.

**Question 6: Setting off fireworks within the proposed area**

A total of 66 people stated they 'strongly agree' with this prohibition, equating to 89 % of responses. 6 people stated they 'agree' whereas 1 person stated they 'disagree'. 1 person stated they had no opinion.

**Question 7: Setting of sky lanterns within the proposed area**

A total of 67 people stated they 'strongly agree' equating to 91% of responses. 6 stated they 'agree' and 1 person stated they 'strongly disagree' with this prohibition.

\*Of note, all four prohibitions had an almost equal number of 'strongly agree' responses, showing there was not one prohibition which was favoured more than the other.

**Question 8: I support Blackburn with Darwen Borough Council bringing a PSPO aimed at preventing wildfires on this Moorland**

A total of 69 people stated they 'strongly agree' with this statement, equating to 93% of the responses. 2 people stated they 'agree' and 3 people stated they disagree.

**Question 9: Which of the following describes you/your family's interest in this matter?**

25 people stated they 'live in the proposal area'

23 people stated they 'live in Blackburn with Darwen but not the proposal area'

14 people stated they 'visit the proposal area but do not live or work there'

5 people stated they were providing an 'official response from a business/organisation/community group'

4 people stated 'other'

2 people stated they 'work in the proposal area'

1 person stated they were providing an 'official response from Parish/BwD Councillor or Elected Member'

Therefore, 34% of all responses were from those who live in the proposal area.

The responses to the online questionnaire show overwhelming support in favour of the proposed PSPO, and the majority of responses came from those who actually live within the proposal area.

There was a free text section at the end of the questionnaire. The positive comments include:

- "Excellent proposal"
- "I whole heartedly support the moorland fire PSPO over the Darwen Moor complex from the perspective of climate change, flood alleviation and biodiversity. I support the PSPO on the grounds of safety, both public and for fire fighters. Moorland wildfires are a significant cost to tax payers in terms of public services. I therefore welcome the proposal".
- "I am in full support of this as a Darwen resident. I also agree that the more widespread it is the better for wildlife and conservation of the moors. It's heart breaking to see the fires on a more and more regular basis and action needs to be taken".
- "Fully supportive of this, the cost to wildlife and the cost of the firefighters is horrendous. Ban it all I say. People need to be responsible and think what they are doing."
- "I absolutely agree with preventing wild fires on the moorland. Currently we are experiencing a decline of wildlife. Habitat destruction is one of many causes for wildlife declining in numbers. Protecting the moorland for conservation to help re-populate and stabilise flora and fauna species are a must. I regularly hike in the area and enjoy the area. Seeing this being destroyed by anti-social behaviours that causes wild fires is devastating! Not just for Nature, but for the enjoyment of others to explore and get away from urban areas. I love being out in the countryside in rural areas to enjoy the peacefulness, the views, the smells, the fresh air etc."

- “I feel having a PSPO in place will go a long way to controlling the risk of wildfire in the area. There have been several devastating wildfires over the years which could have been prevented by PSPO being in place. Youngsters light what they think are small fires which escalate. Camp fires, BBQ’s are lit by members of the public who don’t realise or are ignorant to the risks/dangers of lighting them on peat soil with a lot of dry growth, weather conditions etc. This order would go a long way to protecting and reinforcing the safety of the area. There is a lot of farm land, wildlife (a lot protected/endangered), a large area is of scientific interest with Natural England. A PSPO would hugely benefit the area for so many reasons.
- “I love walking this area and the devastation in the past we need to learn from. Only last weekend I witnessed 4 quad bikes at Darwen Tower and across the moorland causing damage. Great that you are proposing this PSPO. Best of luck.”
- “I saw first-hand the damage caused several years ago when a fire had spread across Darwen Moors and it was absolutely heart breaking. The majority of people who enjoy nature don’t do it to have a BBQ. They do it because we love everything about nature. Those that go to have a BBQ are possibly not interested in the natural environment.”
- “I strongly agree with this PSPO to be put in place imminently. Not only to protect residents, moorland etc., but also to protect local wildlife and keep what moorland/greenery we have left before its bought and built upon by housing developers.”
- “I would like to add my support regards the proposed PSPO to ban; barbeques, fireworks, Chinese lanterns, campfires and camping stoves from Moorland areas, to reduce the risk of wildfires. I don't live in the area but visit Rivington on a regular basis to go walking and enjoy the countryside there. Our wildlife and habitat needs to be protected for now and future generations.”
- “My daughter and I run “Darwen Moors firewatch” group on Facebook and the restrictions would be very helpful to our group. We work closely with moors management and LFRS. As a group we have helped to prevent wildfires and also respond very quickly to any signs of fire. Although we have signs around the moor to warn of fire risk some people tend to ignore them. If there is a chance of prosecution maybe they will take notice. Best of luck.”
- “Natural England are highly supportive of this measure being introduced by Blackburn with Darwen Council. Given the damage summarised below, we know how damaging wildfires have been and are keen to prevent any recurrence. We hope this PSPO will act as a deterrent and remove the majority of objects that could accidentally cause a wildfire.”
- “Need to reduce the risk of moorland fires”
- “Strongly agree with the PSPO being brought in - would support a permanent one”
- “The ban is long overdue!”
- “The effect fires have on the area are utterly devastating. It poses a danger to life in addition to wildlife. Serious action needs to be taken”
- “The fires destroy the peat which is a valuable source of carbon capture. They destroy natural habitats. These take many years to recover. In addition, it is dangerous and costly for the Fire Service.”
- “The identified area has historically been plagued with antisocial behaviour which has regularly resulted in uncontrolled wildfires occurring. This PSPO will undoubtedly have a positive impact in reducing and potentially eliminating wildfires within this beautiful area of moorland. LFRS fully support this application for the implementation of this PSPO.”
- “This is a good idea and should be implemented as soon as possible”

## Concerns Raised on the Questionnaires

### *Whitehall Park Fire Pit*

- Three individuals raised concerns over a locally run fire pit which is in operation in Whitehall Park, Darwen. The fire pit is used by scouts, brownies, outdoor learning groups, garden clubs, men's mental health support groups and local schools. The groups use a portable metal fire pit, fire protective gloves, there is a fire risk assessment, burns kit, first aid kits, one designated fire handler, water and a fire extinguisher on site too. Volunteers have also attended fire safety training. An email was received by the founder of the 'Talk Ourselves Well' group, which is focused on suicide prevention in men. He stated that the fire pit is a focal point of the sessions, as it removes the pressure of eye contact when someone is talking about their life experiences, it brings warmth and comfort to the sessions, and attendees have said how it provides a distraction from life's challenges even if it's only for a couple of hours. The group use a metal fire pit so that there is no damage caused to any of the woodland in the park and to prevent disruption to any animals that may reside in the park. Embers are extinguished and fully doused with water and then disposed of in a safe manner. In the past 18 months, nearly 2300 males have been engaged with through the community activities of this group. The proposed PSPO has not been criticised, but it has been asked that the safe use of the fire pit is allowed to continue should the proposed PSPO be implemented.
  - It would be the responsibility of the land owner to ensure the safe use of any land which falls within the Proposal Area. In this situation, the land owner is Blackburn with Darwen Borough Council, and the park is maintained by Whitehall Park Supporters Group (WPSG). The fire pit has a risk assessment which has been approved by the Lancashire Fire and Rescue Service.
  - In order to accommodate requests such as this, as well as planned events such as the annual Darwen Bonfire, an exemption clause will be added to the PSPO. It will state that a person will be guilty of an offence if the prohibitions are breached, without prior written consent obtained from Blackburn with Darwen Borough Council.
  - Therefore, those responsible for the safe use of the fire pit may request written consent from the Council, to allow the continued use of the fire pit within Whitehall Park.
  - It is proposed that anyone wishing to obtain consent from the Council would have to use the website to book an event, detailing the reasoning why a fire/bbq/fireworks etc. are being used and providing a full risk assessment. This request would then be discussed by the ESAG members and a decision would be made.

### *Enforcement*

- One individual responded stating that the PSPO will need to be enforced. This individual requested advice on who to contact if worrying behaviour is seen in the Rivington Park Area. Specifically, the Rivington resident was reporting quad bikes being driven on the Moors, vandalism and a dog kennels causing an obstruction on the road.

- As these activities would not be prohibited by the proposed PSPO, this concern was passed to the Chorley Council Community Safety Team.
- One individual asked for firm plans and provisions to be put in place to monitor compliance and enforce the PSPO. Another stated they were in favour of the order but concerned about how it will be policed. Another individual asked for somewhere to report sightings of fires being lit.
  - The Lancashire Police Rural Task Force have stated that they will be the lead agency for enforcement of the proposed PSPO for the proposal area in Darwen. Their enforcement patrolling will be guided by the Met Office weather updates. If the proposed PSPO is implemented, a press release would accompany the implementation, which would advise the public on how to report any breaches. There have also been discussions between the Lancashire Police Rural Task Force and the Lancashire Fire and Rescue Service about how to dispose of confiscated items which may have been on fire, e.g. how to safely dispose of a confiscated barbecue.
- One individual stated that vehicular access to the Moors should be restricted and another added that previous culprits have used many different routes down from the Moors to evade detection.
  - Due to the size of the proposal area, restricting vehicular access to the Moors would be impossible. The Moorland area is popular with walkers, rambles, families etc., and there are numerous car parks throughout the proposed area which encourage the use of the Moors. There are also two main roads (A666 and A675) connecting Darwen, Chorley and Bolton, which run through the proposal area. These roads allow direct access to the Moors, therefore it would be impractical to prevent vehicles from using these roads.

#### *Larger Restricted Area*

- Five responses stated that they support the proposal, although three asked for the area of Cranberry Moor, Cranberry Moss and Pickup Bank to be included. One of these responses identified themselves as a land owner who had also emailed the Community Safety Team with the same request. Another individual responded in favour of the proposed PSPO, but stated it should be over a much larger area; however it does not specify which area.
  - There is not enough evidence to suggest that the Cranberry Moss/Cranberry Moor/Pickup Bank area would need to be included in the proposal area.
- One individual stated that the border in Rivington should be to the water's edge on Rivington Upper and Lower reservoirs, Anglezarke and Yarrow.
  - As these areas do not fall within the Blackburn with Darwen boundary, this information was fed back to the working group who have been discussing the proposed PSPO so that Chorley Council could look into this.
- Bolton Council have had to alter their Proposed Area due to representations made during their consultation period. We have not yet been provided with a finalised map from Bolton.

#### *Fines too low*

- Three people stated that the fines were too low to be a sufficient deterrent. One suggested that the minimum fine should be increased to £250, whilst another suggested the consequence of £1000 fine is not enough – it should be a minimum of £1000 depending on

the man powers, loss of death etc., suggesting that this should result in prison. One individual stated the restriction on open doors on the Moorland is long overdue but £100 fine is negligible against the damage caused and resources employed when dealing with a Moorland fire. Another stated that the order should be lifelong not just for three years and hefty fines for those breaking them

- PSPOs must adhere to the legislation set out by the Anti-Social Behaviour, Crime and Policing Act 2014. The statutory guidance states a breach of PSPO is a criminal offence and enforcement officers can issue a fixed penalty notice of up to £100, if appropriate. A fine of up to £1000 can be issued on prosecution. The maximum duration for a PSPOs is three years.

### *Education*

- Three individuals commented on the questionnaire, stating that they believe the proposed PSPO should be supplemented by an education package in schools. A further individual who stated they do not believe the proposed PSPO will work added that they believe education is needed.
  - This has been raised with the Lancashire Fire and Rescue, who are already looking into their education packages and how they can include information about wildfires.

### *Time of Year*

- One individual stated that the proposed PSPO would need to be clear on the times of year it is in place, for example during the drier periods of the year such as summer. The question was asked whether it would be in place during winter, autumn or spring. Another individual stated they believe a camp fire would be acceptable during the wet months, but during the hot months the proposed PSPO would act as a huge deterrent.
  - The Lancashire Fire and Rescue Service have stated that the Burn Season is from 1<sup>st</sup> April to 1<sup>st</sup> October, and during this time it is illegal to burn grass or heather. These dates span across spring, summer and autumn. Fires can still spread between October and April and it is believed that there is still a risk of Moorland fires during the winter months. Therefore, the proposed PSPO would be intended to be in place all year long. The wording of the PSPO was considered and when listing the prohibitions the order clearly states: "The activities which are prohibited at all times by this order are:"

### *Barbeques*

- One individual has enquired whether a designated barbeque area has been considered so that the public may still enjoy barbeques in the countryside.
  - This was raised with the Environment and Operations Department within Blackburn with Darwen Borough Council. They replied stating that it would be impossible to police a designated area. There are signs on the entrance to all parks in the borough



stating 'no barbeques/fires' therefore a designated barbeque area would not be considered due to the risk barbecues present.

- Two people asked that the Local Authority looks into banning the sale of disposable barbecues, with one individual stating disposable barbecues should be banned at every shop, petrol station forecourt and supermarket within the proposal area, especially during hot, dry months.
  - Due to the small percentage of responses regarding this (less than 3%), this is not deemed to be a practical consideration at this time.

#### *Fireworks*

- Two people stated they would like to see fireworks banned entirely as they are a public nuisance. One person stated they would like to see fireworks banned due to their impact on animals, veterans and refugees. Another person asked if the Darwen Bonfire Display at Darwen Cricket Club would be banned if the proposed PSPO was implemented.
  - Due to the small percentage of responses regarding this (less than 3%), this is not deemed to be a practical consideration at this time. In relation to the query about the Bonfire Display, it would be for the organisers to seek permission from the land owner, and ensure the necessary risk assessments are in place. Again, the inclusion of an exemption clause in the PSPO would address this concern.

#### *Other suggestions*

- One individual suggested that beaters are placed on high risk areas of the Moors, similar to what are found in forests, so that the public can reduce the spread of a small fire.
  - Some of the Moorland is very remote and should a fire spread, there may not be any members of public around to use the beaters. Also, due to the size of the Moorland, it would not be practical to have beaters placed around the Moors, as it would be impossible to ensure beaters were accessible across the whole landscape.
- One individual suggested that large permanent signs are placed at every car park and lay by advising 'no barbecues'
  - If the proposed PSPO was implemented, signage would be placed around the proposal area advising of the prohibitions. Partners will agree collectively on where to place the signs, and will be guided by Natural England as some locations will be 'protected sites' and will therefore require permission before signs are erected.
- One individual suggested volunteer mobile rangers are used, who carry information leaflets and patrol 'honey pot areas' which are easily accessible by car during hot, tinder dry, high risk areas.
  - The Lancashire Fire and Rescue Service receive daily hazard awareness updates from the Met Office. This 'Hazard Manager' system provides a five day weather assessment. They have suggested that these weather updates are utilised to direct activity on hot days. It will be the responsibility of land owners, land managers, partner agencies and volunteer groups to ensure preventative measures are in place, which would include educating the public on the prohibitions, which volunteer groups can do by talking to members of public who they come across on the Moors.

- The Lancashire Police Rural Task Force will be responsible for enforcement patrols during heightened periods of risk, using the Met Office Hazard Manager system for guidance.
- One individual stated that they are worried about the impact of the proposed PSPO due to the decimation of ranger services, the police and a serious lack of funding for public services; however this individual then stated the proposed PSPO is a step in the right direction until a more enlightened attitude towards ranger services and police emerge.
  - The Lancashire Police Rural Task Force would be the lead agency for enforcement of the proposed PSPO. They are a relatively new unit within Lancashire Police, and the residents of Darwen may not be aware of its existence. The Rural Task Force are active on social media, and could be asked to share information relating to the proposed PSPO on their social media account if it was implanted.
- One individual stated that addressing climate change and the increasingly unpredictable weather patterns should also be something undertaken to prevent wildfires. They suggested that at the very least, the Council should go plant-based for meetings events, focus on compostable materials, improve recycling etc.
  - Blackburn with Darwen Borough Council is committed to addressing climate change. In January 2023, a 'People's Jury on the Climate Change Crisis' was launched. This is a community-led initiative where a panel of 26 local residents spent three months learning about climate change before producing a set of 15 recommendations which businesses, organisations and residents within the borough can adopt in order to reduce their climate impact. The Council is also investing in staff training, cutting the carbon footprint of the Council, and finding ways to decarbonise Council vehicles.

## Conclusion

Local Authorities can implement a PSPO under the Anti-Social Behaviour, Crime and Policing Act 2014 to prohibit specified activities and/or require certain things to be done by people engaged in particular activities, within a defined public area. Before making a Public Spaces Protection Order, the Council must be satisfied on reasonable grounds that two conditions are met.

The first condition is that:

- a) Activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or
- b) It is likely that activities will be carried on in a public place within that area and that they will have such an effect.

Data provided by the Fire and Rescue Service shows that in the past five years, there have been 102 outdoor fires in the Darwen Moor, Winter Hill and Anglezarke area, although addresses were not provided for 18 of these fires. Out of the remaining 84 outdoor fires which do have address details, 26 occurred in the borough of Blackburn with Darwen. 11 of the 26 fires were determined to be accidental, 10 were deliberate and five had unknown origins (Appendix 7). Two of these fires had a

catastrophic impact on the Moorland, impacting on the interest features of the Moors, such as acid grassland, blanket bog, mixed woodland, dwarf shrub heath, fen marsh and swamp, neutral grassland and standing open water. These fires also caused many hectares of grassland to become unstable, resulting in large areas of bare earth and a loss of habitats. This directly affects the local community, as there is a risk of deterioration to the water quality in surrounding water bodies (Appendix 4). United Utilities owns part of the Moorland, in order to gather water for drinking purposes. They noted that the Winter Hill 2018 fire and Darwen Moor 2020 fire both impacted on the water quality in their reservoirs, and the water required more intensive treatment at the receiving water treatment works. A further concern highlighted in the aftermath of the Darwen Moor 2020 fire was that the fire had burnt over the top of a high-pressure gas pipeline, which could have resulted in multiple fatalities if it had exploded (Appendix 3).

The Fire and Rescue Service data shows that almost a third of reported outdoor fires occurred within the borough of Blackburn with Darwen. Almost half of these fires were started accidentally, showing that the risk of using any kind of fire on the Moorland, poses a huge risk to both the local community and local wildlife.

The second condition is that the effect, or the likely effect, of the activities:

- a) Is, or is likely to be, of a persistent or continuing nature,
- b) Is, or is likely to be, such as to make the activities unreasonable, and
- c) Justifies the restrictions imposed by the Order.

The fact that almost half of the fires that have occurred on Darwen Moor in the past five years have been started accidentally shows that activities using fire pose a continuing risk to the Moorland. It is proven that people will continue to engage in activities on the Moors which use fire, despite being informed of the risks; this is evident as there was widespread media coverage of the Winter Hill 2018 fire, yet just two years later, a barbeque was used on the Moorland, causing the Darwen Moor 2020 fire. The damage caused by these wildfires is so destructive and far-reaching, that the use of fire-related activities on the Moors (e.g. a barbeque) cannot be deemed to be reasonable.

Based on the results of this consultation, it is likely we can satisfy both conditions.