COUNTRYSIDE ALLIANCE BRIEFING NOTE: GOVERNMENT'S POLICIES ON BIODIVERSITY AND THE COUNTRYSIDE

Debate, House of Lords

Thursday 13 November 2025

Contents

Key points

- **Thanks to their management for grouse shooting, more than 60 percent of England's upland Sites of Special Scientific Interest are managed grouse moors, and over 40 percent have also been designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under the EU Birds and Habitats Directives.**

- **The theory and practice of modern gamekeeping is focused on conservation and a respect for biodiversity. Modern gamekeepers are expected to have undertaken formal apprenticeships or college courses, gain practical qualifications, and attend best-practice courses.**

- **Rotational heather burning, also known in Scotland as 'muirburn', on shallow peat and dry heath is done to increase the diversity of heather age and structure. The aim is to create lots of micro-habitats for a full range of habitats allowing the widest possible biodiversity. A low intensity 'cool burn' in small patches removes the canopy but prevents the burning of peat or moss beneath the vegetation, avoiding the resultant loss of carbon and delay in regrowth of the heather.**

- **Peer reviewed scientific research has shown that on moors managed for grouse shooting, ground nesting birds such as curlew and lapwing are 3.5 times more likely to raise chicks successfully. Densities of golden plover, curlew, redshank and lapwing were up to five times greater on managed grouse moors compared to unmanaged moorland.**

- **Just ten years ago, in 2013, there were no successful nesting attempts by hen harriers in England, but there are now more nesting than at any point since they were lost as a breeding species around 200 years ago. A total of 565 hen harrier chicks have now fledged since Natural England issued its first licence for the Brood Management Trial in 2018.**

- **The Countryside Alliance advocates a "rooftop-first" approach to solar installations as part of the government's bid to boost renewable energy. Solar panels should be placed on the rooftops of new homes, commercial buildings, and car parks before using farmland or greenfield sites. This would protect valuable agricultural land and natural spaces while maximising the use of existing infrastructure.**

- **One of the most promising means of preserving biodiversity is engendering respect for nature in young people. The Countryside Alliance firmly supports outdoor education and plays a direct role in providing it through our Fishing for Schools programme. We would like to see the government do more to integrate understanding of nature across the curriculum.**

Land management and shooting

- Habitat creation and maintenance is integral to game shooting; 7.6 million hectares of land receive habitat management and conservation as a result of shooting. The habitat and cover that shoots provide benefit not only game species, but also a considerable variety of wildlife, including butterflies, rare flora, red- and amber-listed wild and farmland bird species such as passerines and waders.

- For example, woodland managed for shooting provides richer and more varied habitat compared to woodland managed for commercial timber; research shows there can be 4× as many butterflies in wide woodland rides required for shooting as on the woodland edge.

- Conservation work carried out by shoots is worth c. £500 million (cost in kind) annually, equivalent to 26,000 full time jobs.

Moorland management

- Grouse moor management has played a key role in creating and maintaining our upland landscape, preserving and improving heather habitat and peatland, sustaining some of our rarest plants and wildlife, and promoting biodiversity.

- Grouse are a wild bird and, unlike pheasants and partridges, their population is not maintained or increased by the release of birds which have been hand-reared. Living on the moor all year round, red grouse are territorial and travel very little during their lives, and with the right conditions can breed prolifically. However, as ground nesting birds, they are particularly vulnerable to predators, disease, weather, and loss of suitable habitat, which makes the preservation of this unique species both demanding, and of considerable importance.

- Heather moorland in the UK is internationally important and it is widely recognised that grouse shooting has helped preserve it. Those calling for a ban on driven grouse shooting need to set out a viable, alternative vision for our uplands. The International Union for the Conservation of Nature has identified the three dimensions to the core of mainstream sustainability as being environmental, social and economic. All three need to be addressed by anyone wanting to see a change to the status quo, and any alternative land use needs to be at least as beneficial as that currently in place.

- It is because of their management for grouse shooting that more than 60 percent of England's upland Sites of Special Scientific Interest are managed grouse moors, and over 40 percent have also been designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under the EU Birds and Habitats Directives.

- The theory and practice of modern gamekeeping is focused on conservation and a respect for biodiversity. Modern gamekeepers are expected to have undertaken formal apprenticeships or college courses, gain practical qualifications, and attend best-practice courses.

- If people, both the public and governments, continue to value heather moorland landscapes, then they will need to be maintained. Research into the sustainability of driven grouse shooting published by the Institute for Social Innovation and Impact at the University of Northampton in August 2021 found that the current model of integrated moorland management, which includes driven grouse shooting as part of the economic and social mix, is a sustainable approach to maintaining such landscapes. Indeed, there was no evidence that any other management regime would deliver the same result.

Heather burning

- Rotational heather burning, also known in Scotland as 'muirburn', on shallow peat and dry heath is done to increase the diversity of heather age and structure. It is an essential tool for moorland managers when reducing the fuel load to help curtail the risk of wildfires, which has increased because of climate change and can cause significant environmental damage by burning into peat.

- Burning is done in small patches, the frequency of which depends on how fast heather is growing and becoming dominant in the area. It ensures a mixture of older heather for protection and nesting of birds, younger heather for feeding, and a fresh burn where regrowth is just starting. It also acts as a fire break to help prevent the spread of uncontrolled wildfires and encourages the growth of peat-forming sphagnum moss which filters and absorbs water.

- The aim is to create lots of micro-habitats for a full range of habitats allowing the widest possible biodiversity. A low intensity 'cool burn' in small patches removes the canopy but prevents the burning of peat or moss beneath the vegetation, avoiding the resultant loss of carbon and delay in regrowth of the heather.

- On 16 February 2021, the government published legislation (The Heather and Grass etc. Burning (England) Regulations 2021 (legislation.gov.uk)) to protect blanket bog habitats in England. The regulations, which came into force that May, prevented burning on areas of peat over 40cm deep on Sites of Special Scientific Interest that are also Special Protection Areas or Special Areas of Conservation, except under licence. This did not

apply if the area to be burned in one burning season had a slope of more than 35 degrees or was more than half covered by exposed rock or scree, and in either case was a single area of 0.5 hectares or less, or on two or more areas within 5 metres of each other with a combined area of 0.5 hectares or less.

- It was recognised that neglecting to manage moorland risks significant damage from wildfires, which have been increasing due to climate change. The regulations therefore allowed applications for a licence permitting to burn on blanket bog where otherwise prohibited. This could be granted where it was either beneficial or necessary:

    a) For the purposes of conservation, enhancement or management of the natural environment;
    b) For human safety;
    c) To reduce the risk of wildfire;
    d) Because the specified vegetation is inaccessible to mechanical cutting equipment, and any other method of management is impracticable.

- However, these four categories have been amended by the current government, following a 2025 consultation, to the following list, replacing the ground of inaccessibility with one for educational purposes:

    a) For the conservation, enhancement, or management of the natural or historic environment for the benefit of present and future generations;
    b) For human safety;
    c) To reduce the risk of wildfire;
    d) For research or educational purposes.

- In making this decision it appears that the rigorous science and evidence required when making policy had either been overlooked or ignored, with the most recent research not having been taken into account.

- The Alliance's response to the consultation highlighted our grave concerns with the government's proposal to expand protections to all deep peat in the uplands by redefining its depth from the present 40cm to 30cm and extending the ban on burning from 220,000 hectares to 676,628 hectares. Despite having highlighted all the science and evidence which supports the continued use of burning as an essential management tool, our concerns, along with those of other organisations with an understanding of the issues at hand, have been totally disregarded.

- The Future Landscapes Forum, a group of leading academics with considerable expertise and scientific knowledge currently researching burning in our uplands, has published a position statement which is extremely critical of the government's policy change on burning and the grounds on which it has been made.

- The statutory Code of Practice for heather burning, The Heather and Grass Burning Code (Defra, 2007) developed with key stakeholders, acknowledges that *"Fire has been used by land managers for many thousands of years. When used with skill and understanding, it can benefit agriculture, game birds and wildlife."*

- The Code defines a 'burning season' running from 1 October – 15 April in upland areas, when roots are at their wettest to avoid a hot burn that can otherwise enter the peat. To burn in environmentally protected areas, such as Sites of Special Scientific Interest (SSSIs), consent is required from Natural England and there are strict limits on how much heather can be burned at a time. More than 60 per cent of English grouse moors are designated as SSSIs. A licence is also required to burn in sensitive locations such as on a slope or near a watercourse.

Predator control

- Peer reviewed scientific research by the Game and Wildlife Conservation Trust has shown that on moors managed for grouse shooting, ground nesting birds such as curlew and lapwing, which are amongst our species of the highest conservation concern, are 3.5 times more likely to raise chicks successfully. A survey of upland breeding birds in parts of England and Scotland also found that the densities of golden plover, curlew, redshank and lapwing were up to five times greater on managed grouse moors compared to unmanaged moorland.

- A new GWCT study published in March 2025, which revisits an earlier predation control experiment undertaken in North Northumberland in the earlier 2000s, reveals the devastating ecological impact of the withdrawal of legal predator control. During the original experiment, foxes and crows were controlled and ground-nesting birds experienced a dramatic improvement in breeding success. Populations of moorland species such as curlew, lapwing, golden plover, and red grouse all saw significant increases.

- However, within just a decade of stopping predator management, the situation was completely reversed. Fox numbers rose by 78%, and Carrion Crows by 127%. Meanwhile black grouse and grey partridge became locally extinct. Red grouse numbers dropped by 71%, golden plover by 81%, snipe by 76%, curlew by 24%, and lapwing by 58%. Importantly, the habitat was largely unchanged. One part of the study measured the height of dominant vegetation and there was no significant difference at the start and end of the period suggesting that the cessation of predator control was the key driver in bird declines.

- Black grouse, a species of the highest conservation concern, also benefits from this management. With a population that has declined 50 percent nationally, 96 percent of the surviving male black grouse in the North of England are found adjacent to moorland that is managed for red grouse, thanks to the management of predators. Black grouse are usually found on the lower parts of moorland where the need for predator control, including the use of humane restraints, is particularly important.

- Humane restraints have been shown to exceed the requirements set out in the Agreement on International Human Trapping Standards (AIHTS), are used to target individual species, and are an irreplaceable tool used in the conservation of many of our rarest species and in the protection of livestock. They are of vital importance to wildlife management, increasing biodiversity and protecting vulnerable species.

- The scientific research that has gone into investigating humane restraints is unparallelled when compared to other methods of generalist predator control. Indeed, the conclusion that humane restraints exceed AIHTS standards is corroborated by both a Defra trial and the peer-reviewed study by Short et al., Wildlife Society Bulletin, 2012. Through the use of humane restraints, the government can bolster conservation efforts which are designed to protect and reverse the decline of our rarest species.

Birds of prey

- All wild birds are protected by law. The main law applying to the management of wild birds is the Wildlife and Countryside Act 1981 which transposes the requirements of the EU Birds Directive as well as a number of international agreements relating to conservation. The 1981 Act protects all wild birds, their eggs and nests, and states that they cannot be killed or taken except in certain circumstances, for example, during the open seasons for game species or under the authority of a General or Individual Licence.

- The 1981 Act makes it an offence to disturb the nest or chicks of any Schedule 1 bird, which includes all species of harriers, peregrine falcons, golden eagles, white-tailed (sea) eagles, ospreys and many other moorland birds.

- The Countryside Alliance, along with the British Association for Shooting and Conservation, Moorland Association and National Gamekeepers' Organisation – four of the largest organisations representing shooting in England and Wales – has been joined by the Country Land and Business Association in publicly condemning all forms of raptor persecution. While many reports of such persecution have proven to be false, the illegal killing of birds of prey is still carried out by a small minority of irresponsible individuals, and we strongly condemn their actions, and have a zero-tolerance policy towards any such incident. There can be no place for them in a sector that is otherwise overwhelmingly positive; one that is the economic driver for many of our more remote communities, and the largest contributor to conservation schemes in England and Wales.

- Defra's Joint Hen Harrier Recovery Plan, which was published in January 2016 with the support of the RSPB, included a trial brood management scheme for hen harriers that provided relief for land managers suffering high predation losses during the nesting season in the uplands.

- The RSPB chose to withdraw their support of this long-awaited Plan in July 2016, only six months after it had been published, and before any brood management schemes had been trialled. It is the only conservation group to have done so, and continues to maintain its objection to the scheme despite its overwhelming success.

- Just ten years ago, in 2013, there were no successful nesting attempts by hen harriers in England, but there are now more nesting than at any point since they were lost as a breeding species around 200 years ago. A total of 565 hen harrier chicks have now fledged since Natural England issued its first licence for the Brood Management Trial in 2018, and the figures for 2022 (119 chicks fledged) and 2023 (141 chicks fledged) were exceptional when compared with those during the previous 30 years.

Solar farms

- The Countryside Alliance responded to the government consultation on the National Policy Framework in September 2024 making a case for a *"rooftop-first"* approach to solar installations as part of the government's bid to boost renewable energy. We argued that solar panels should be placed on the rooftops of new homes, commercial buildings, and car parks before using farmland or greenfield sites. This would protect valuable agricultural land and the natural spaces that are essential to biodiversity and nature while maximising the use of existing infrastructure.

- On 17 January, Housing Minister Matthew Pennycook MP responded on behalf of the government to the New Homes (Solar Energy) Bill, a Private Member's Bill brought by Max Wilkinson MP (Cheltenham, LD) and supported by the Countryside Alliance. He said:

> *"The Government are extremely sympathetic to the intention behind the Bill, namely to significantly boost the deployment of rooftop solar. That aim is clearly shared widely across the House, and for good reason… However, we cannot support the Bill today. That is because the Government already intend to amend building regulations later this year as part of the introduction of future standards that will set more ambitious energy efficiency and carbon emissions requirements for new homes. The new standards will ensure that all new homes are future-proof, with low-carbon heating and very high-quality building fabric."*[1]

- In June, the government confirmed that the Future Homes Standard, to be published this autumn, would require new build homes to have solar panels by default and also have low-carbon heating, such as heat pumps and high levels of energy efficiency.[2]

- An earlier report about the plan drew criticism from the Home Builders Federation, however, that the proposal new homes to offset 40% of their carbon footprint are *"unrealistic"* and could cause delays to building. The Federation suggested that an alternative offsetting target of 20% would be more viable.[3]

- Solar energy is an important part of the UK's sustainable energy mix and we must prioritise the growth of solar projects on brownfield sites, existing roofs and new-builds, thereby reducing the pressure for solar farms on productive agricultural land.

- The clustering of developments around sub-stations has consequences for local landscapes and amenities, and that cumulative effect intensifies the harm caused. We have urged the National Energy System Operator (NESO) to take steps to address this trend in its principles concerning the siting of new substations.

Outdoor education

- One of the most promising means of preserving biodiversity is engendering respect for nature in young people. The Countryside Alliance firmly supports outdoor education and plays a direct role in providing it through our Fishing for Schools programme.

- Since its foundation, Fishing for Schools has allowed over 4,000 children and young people from over 150 schools to benefit from learning outdoors and connecting with nature. The total of 152 schools is comprised of 76 secondary, 23 primary and 37 SEN schools, plus 15 alternative provisions and 4 mental health groups.

- Campaigners for outdoor education, led by The Outward Bound Trust – a charity that provides outdoor education for children of a range of age-groups – focus on securing a guarantee of a formal programme of residential outdoor education for all pupils as a standard element of the curriculum.

---

[1] HC Deb, 17.01.25, c651-652
[2] DESNZ/MHCLG, Rooftop solar for new builds to save people money, 06.06.25
[3] Financial Times, Installing solar panels on all new homes will slow housebuilding, industry warns, 06.05.25

- This campaign has been adopted as a cross-party effort across England, Wales and Scotland.
    - In England, Tim Farron MP (Westmorland and Lonsdale, LD) brought a Private Member's Bill in the last session of the previous Parliament, but as a Presentation Bill it lacked parliamentary time to make progress.[4]
    - In Wales, Sam Rowlands MS (North Wales, Con) introduced the Residential Outdoor Education (Wales) Bill in 2023.[5] Per Senedd procedure it was then subject to a consultation to which the Countryside Alliance responded positively,[6] but ultimately the Bill, having failed to attract support from the Welsh Government, was defeated by one vote in April 2024.[7]
    - In Scotland, Liz Smith MSP (Mid Scotland and Fife, Con) introduced the Schools (Residential Outdoor Education) (Scotland) Bill[8] which in April 2025 received a positive reception at Stage 1 after SNP Members abstained from voting, but under the procedure of the Scottish Parliament it will be unable to make progress because the Scottish Government has declined to table the financial resolution necessary for it to progress to Stage 2.[9]

Future Countryside polling

- In advance of Future Countryside 2025, the now-annual rural conference that unites the diverse voices of farmers, environmentalists, entrepreneurs, and policymakers, polling carried out by ORB on behalf of the conference found significant interest in outdoor education and expanded opportunities to learn about the natural world.

    - 69% said they had some kind of outdoor learning as part of their education, whereas 27% said they did not recall outdoor learning.
    - Of those who recalled receiving this education, 91% said it left them with a positive impression of the countryside (56% very positive, 35% somewhat positive).
    - 75% said they would be interested in a Natural History GSCE qualification, while only 21% said they would not be interested.
    - 79% feel motivated to spend time in the countryside (37% very motivated, 43% somewhat motivated).[10]

For more information please contact:

James Legge
Director of Public Affairs
James-Legge@countryside-alliance.org

David M Bean
Parliament & Government Relations Manager
David-Bean@countryside-alliance.org

[4] UK Parliament, Outdoor Education Bill 2024-25
[5] Welsh Parliament, Residential Outdoor Education (Wales) Bill
[6] Welsh Parliament, Children, Young People and Education Committee, Response from Countryside Alliance (Wales)
[7] Countryside Alliance, Senedd narrowly rejects Outdoor Education Bill, 22.04.24
[8] Scottish Parliament, Schools (Residential Outdoor Education) (Scotland) Bill
[9] Countryside Alliance, Schools (Residential Outdoor Education) Bill - SNP abstain from voting, 03.04.25
[10] Future Countryside, Poll: Farmers better champions of the countryside than environmental activists say Gen Z, 20.05.25