

Notice of Meeting

Communities, Environment and Highways Select Committee

**Date & time**

Thursday, 19
September 2019 at
10.00 am

Place

Ashcombe Suite,
County Hall, Kingston
upon Thames, Surrey
KT1 2DN

Contact

Huma Younis
Room 122, County Hall
Tel 020 8213 2725

Chief Executive

Joanna Killian

huma.younis@surreycc.gov.uk

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This meeting will be held in public. If you would like to attend and you have any special requirements, please contact Huma Younis on 020 8213 2725.

Elected Members

Mr John O'Reilly (Chairman), Mr Andy MacLeod (Vice-Chairman), Mr Saj Hussain (Vice-Chairman), Mrs Fiona White, Mr Mike Bennison, Mr Paul Deach, Mr Jonathan Essex, Mr John Furey, Mr Ken Gulati, Mrs Jan Mason, Mrs Becky Rush and Mr Keith Witham.

TERMS OF REFERENCE

The Select Committee is responsible for the following areas:

- Waste and recycling
- Highways
- Major infrastructure
- Investment/Commercial Strategy (including Assets)
- Economic Growth
- Housing
- Local Enterprise Partnerships
- Countryside
- Planning
- Aviation and Sustainable Transport
- Flood Prevention
- Emergency Management
- Community Engagement and Safety
- Fire and Rescue
- Trading Standards

AGENDA

1 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

To report any apologies for absence and substitutions.

2 MINUTES OF THE PREVIOUS MEETING

(Pages 5
- 12)

To agree the minutes from the Select Committee meeting held on 01 July 2019.

3 DECLARATIONS OF INTEREST

All Members present are required to declare, at this point in the meeting or as soon as possible thereafter:

- I. any disclosable pecuniary interests and / or;
- II. other interests arising under the Code of Conduct in respect of any item(s) of business being considered at this meeting.

NOTES:

- Members are reminded that they must not participate in any item where they have a disclosable pecuniary interest;
- as well as an interest of the Member, this includes any interest, of which the Member is aware, that relates to the Member's spouse or civil partner (or any person with whom the Member is living as a spouse or civil partner); and
- Members with a significant personal interest may participate in the discussion and vote on that matter unless that interest could be reasonably regarded as prejudicial.

4 QUESTIONS & PETITIONS

To receive any questions or petitions.

Notes:

1. The deadline for Member's questions is 12.00pm four working days before the meeting (*13 September 2019*).
2. The deadline for public questions is seven days before the meeting (*12 September 2019*).
3. The deadline for petitions was 14 days before the meeting, and no petitions have been received.

5 SURREY FIRE AND RESCUE SERVICE TRANSFORMATION WORKING GROUP FINAL REPORT

(Pages
13 - 36)

Purpose of report: To provide the Communities, Environment and Highways Select Committee with a detailed report on the findings and recommendations of the Fire Transformation Working Group which was set up to review the 'Making Surrey Safer-Our Community Safety Plan'

which proposes a number of changes to the way Surrey Fire and Rescue Service operates.

6 SURREY FIRE AND RESCUE SERVICE (SFRS) MAKING SURREY SAFER - OUR PLAN 2020-2023 (Pages 37 - 208)

Purpose of report: For the Communities, Environment and Highways Select Committee to scrutinise the 'Making Surrey Safer' plan and review the feedback from the public consultation, making recommendations to Cabinet.

7 WASTE TASK GROUP FINDINGS (Pages 209 - 242)

Purpose of report: To inform the Communities, Environment and Highways Select Committee of the outcome of the work of the Waste Task Group.

8 PARKING STRATEGY UPDATE (Pages 243 - 270)

Purpose of report: This report seeks the Communities, Environment and Highways Select Committee's views about changes to the council's on street parking management and enforcement policies including a review of fees and charges for parking related services.

9 SURREY COUNTY COUNCIL'S RESPONSE TO STATUTORY CONSULTATION ON HEATHROW AIRPORT EXPANSION (Pages 271 - 302)

Purpose of the report: The Communities, Environment and Highways Select Committee is asked to consider the County Council's draft response to the statutory consultation on Heathrow Airport Limited's plans for airport expansion.

10 FORWARD WORK PROGRAMME AND ACTIONS AND RECOMMENDATIONS TRACKER (Pages 303 - 312)

Purpose of the item: For the Select Committee to review and agree the draft forward work programme and review the progress of actions and recommendations at previous Select Committee meetings.

11 DATE OF NEXT MEETING

The next meeting of the Select Committee will be held on 22 November 2019 in the Ashcombe Suite at County Hall.

Joanna Killian
Chief Executive
Published: 11 September 2019

MOBILE TECHNOLOGY AND FILMING – ACCEPTABLE USE

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Thank you for your co-operation

MINUTES of the meeting of the **COMMUNITIES, ENVIRONMENT AND HIGHWAYS SELECT COMMITTEE** held at 1.00 pm on 1 July 2019 at Ashcombe Suite, County Hall, Kingston upon Thames, Surrey KT1 2DN.

These minutes are subject to confirmation by the Committee at its meeting on Thursday, 19 September 2019.

Elected Members:
(*present as expected)

- * Mr Saj Hussain (Vice-Chairman)
- * Mr John O'Reilly (Chairman)
- * Mr Andy MacLeod (Vice-Chairman)
- * Mrs Fiona White
- * Mr Mike Bennison
- * Mr Paul Deach
- * Mr Jonathan Essex
- * Mr John Furey
- * Mr Ken Gulati
- * Mrs Jan Mason
- * Mrs Becky Rush
- * Mr Keith Witham

In attendance

Denise Turner Stewart, Cabinet Member for Community Safety, Fire & Resilience

1 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS [Item 1]

Apologies were received from Jan Mason and Mike Goodman, Cabinet Member for Environment and Waste.

2 DECLARATIONS OF INTEREST [Item 2]

There were none.

3 QUESTIONS & PETITIONS [Item 3]

No questions or petitions had been received.

4 UPDATE FROM THE WASTE TASK GROUP [Item 4]

Declarations of interest:

None

Witnesses:

Dr Andrew Povey, Chairman of the waste task group
Alan Bowley, Interim Head of Environment
Jason Russell, Executive Director for Highways, Transport and Environment

Key points raised during the discussion:

1. The Chairman started by explaining that the Executive Director for Highways, Transport and Environment was leaving the council and

thanked him for all his hard work, wishing him all the best for the future.

2. The item was introduced by the Chairman of the Waste task group whom explained that in January 2019 the Cabinet had paused on the closure of four Community Recycling Centres (CRC's). The waste task group would be reporting back to Cabinet with its findings in September. A key priority of the task group was to try and find savings in the current operation of the CRC's and investigate ways of increasing recycling rates. A number of site visits had been undertaken at various CRC's across Surrey and the group supported the use of re-use shops at these sites. Therefore it was important that the CRC's were kept and developed as a place for recycling and helping the environment.
3. Two Members of the Waste task group whom were also Members of the Committee stated that the closure of CRC's was deeply unpopular and reusing goods needed to be promoted alongside recycling.
4. The Chairman queried if the waste task group had had any ideas of how income could be generated at CRC's. The Chairman of the waste task group explained that re-use shops had been extended which would not only generate income but take goods out of the waste stream. A bike scheme had also been set-up to refurbish and resell bikes which could also be extended. It was further added that the county needed to work better with the voluntary sector to promote re-use. Importantly further work needed to be done with residents to promote the re-use, recycle and reduce agenda.
5. A Member of the Committee queried if there were plans to extend re-use shops to other CRC locations and if it was possible to identify individuals not recycling properly and engage with them more proactively about the benefits of recycling. The Interim Head of Environment explained that Suez collected all re-use items from CRC's and delivered them to the four re-use shops. Discussions were taking place on whether these shops could be stand alone and if co-location was actually necessary. Through the use of performance data, the Surrey Environment Partnership would be targeting efforts to promote recycling in areas where recycling rates were low.
6. A Member of the Committee stated that they were relieved to hear that the Task Group were in support of retaining the four CRC's and queried if it was possible to differentiate between commercial and household rubbish. The Interim Head of Environment explained that van permits were being introduced for commercial activity but there would also be a grey area in terms of unscrupulous users but work was being done with Suez to identify these people. It was added that charging for waste was set by government and the council was legally entitled to charge for the disposal of some waste. The Chairman of the task group stated that the group had not reviewed charging and would look into the details of this.
7. Concerns were raised around the implications of charging for waste and specifically issues around fly-tipping and individuals burning wood. It was therefore important to review these decisions in line with other council policies.
8. A Member of the Committee asked for officers to clarify closing times for CRC's especially Randall's Lane. The Chairman of the task group stated that in order to encourage re-use and recycling, information about the CRC's needed to be clarified and information was already available on the public website.

9. The Interim Head of Environment stated that Surrey CRC's did not track people visiting sites although permit schemes were being introduced to control cross border waste disposal. It was explained that Suez was responsible for handling Surreys waste through a PFI contract.
10. Members of the Committee were in support of more work being undertaken with social groups around the re-use of goods.
11. Another Member of the Committee argued that the current contract in place with district and boroughs was not working. The Interim Head of Environment explained that there were four district and boroughs within the current contractual arrangements but with the governments drive towards more consistency with collections these arrangements could possibly change with more authorities joining the arrangements.
12. The Chairman recommended that the task group should review charging at CRC's. The Chairman of the task group stated that although the group had not taken a view on this, all evidence to increase recycling points to one direction with regards to charging.

Resolved:

The Communities, Environment and Highways Select Committee,

- I. welcome and endorse the waste task groups indication for keeping all CRC's in Surrey open,
- II. encourage extensive publicity and communication around recycling to residents by both officers and members,
- III. scrutinise the final waste task group report before submission to Cabinet,
- IV. recommend that the waste task group consider charging for waste disposal at CRC's as part of their work programme.

5 RETHINKING TRANSPORT PROGRAMME [Item 5]

Declarations of interest:

None

Witnesses:

Simon Griffin, Partnership Lead, Strategic Commissioning
Colin Kemp, Deputy Leader

Key points raised during the discussion:

1. The report was introduced by the Deputy Leader and Partnership Lead whom explained that the rethinking transport project had been set up to fundamentally reimagine transport in Surrey and will contribute to achieving the ambitions of Surrey's 2030 Vision and the Health and Wellbeing Strategy.

Paul Deach left the meeting at 2pm

2. The Chairman started with questioning and asked how committed the Deputy Leader was to the fundamental reimagining of transport in Surrey. The Deputy Leader stated that he was committed to rethinking transport and that there would be some quick wins and longer term goals. The Deputy Leader was committed to a high level challenge and was optimistic about what could be achieved. The Chairman

queried what these quick wins were. The Deputy Leader stated that he did not want to pre-empt anything and was waiting for IMPOWER to produce their discovery phase report. The Partnership Lead explained that work was still ongoing with partners and a collective decision on short term wins would be concluded in due course.

3. A Member of the Committee queried if the consultation would be looking at google map data to identify the journeys people were actually undertaking or would be based solely on qualitative data. He further asked if this project would lead to further cuts to bus services in Surrey and would deal with both climate change and air pollution concerns in Surrey. The Deputy Leader assured members that this project was not about cuts to services but more about how we deliver better and more efficient services. The Partnership Lead explained that the service was listening to the views of partners and residents before making any decisions regarding services. It was added that a discovery phase report would be produced within the next few weeks.
4. Concern was raised around investment required for this project. It was queried if any other councils had undertaken similar projects and who the key partners in this project were. The Deputy Leader recognised that the council was experiencing financial challenges but better use of capital would improve the revenue position. No other councils had undertaken a project on this level. The Partnership Lead explained that there were councils that were doing similar work and looking at specific aspects of the travel system including Leeds, Tees Valley and Hackney. Discussions had also taken place with the business community, Bob Pickles, the two LEPS in Surrey, education settings, district and boroughs, Youth Cabinet and health colleagues.
5. A Member of the Committee suggested that rural and urban settings are considered separately as part of this work especially as a number of GP surgeries had been moved out of villages to more urban areas. The Deputy Leader assured the Committee that rural communities would be taken seriously as part of this work.
6. The Chairman stated that this was a project worth pursuing as long as the commitment was there to see this through for the next two years. The Chairman asked the Committee if there was any interest from the Committee in reviewing the pilot projects as they progressed and helping form policy initiatives associated with the project. Some Members of the Committee were of the view that a task and finish group should not be formed on this project until the discovery phase report was ready.
7. A Committee Member suggested that regular briefing notes on the progress of the project were shared with the Committee. The Deputy Leader agreed to this.

Resolved:

The Communities, Environment and Highways Select Committee,

- I. support the Rethinking Transport project and will receive an update on the conclusion of the discovery phase in due course,
- II. agree for the Committee to receive briefings from the Deputy Leader on the progress of the Rethinking Transport project going forward.

6 SURREY FIRE AND RESCUE SERVICE TRANSFORMATION WORKING GROUP PROGRESS REPORT [Item 6]

Declarations of interest:

None

Witnesses:

Saj Hussain, Chairman of the Fire Transformation Working Group

Tina Mountain, Working Group Member

Denise Turner Stewart, Cabinet Member for Community Safety, Fire & Resilience

Steve Owen Hughes, Director of Community Protection & Emergencies

Key points raised during the discussion:

1. The progress report was introduced by the Chairman of the Fire Transformation Working Group whom explained the work that had been undertaken to date. The Chairman thanked members of the group and explained that various stakeholders had been met to discuss the community safety plan. The Working Group Member explained that the Working Group had met with the Chief Fire Officer at Hampshire Fire and Rescue and was impressed by the Fire and Rescue Authority's way of working with firefighters.
2. The Chairman asked if Working Group Members felt that safety would be compromised with the changes to night time cover. The Chairman of the Fire Transformation Working Group stated that one of the main issues was concerns around the shortage of staff within the service. The Chairman was supportive of the dynamic cover tool used by the service. The Working Group Member stated that a concern the Group had was around the availability of on-call firefighters.
3. A Member of the Committee queried if the number of firefighters would reduce with the new proposals. The Director of Community Protection & Emergencies explained that there had been a combination of historic shortages within the service over the years however recruitment was being undertaken to increase firefighter numbers. Importantly recruitment was being undertaken to the levels needed to maintain full capacity and the IRMP had modelled the correct level of fire service required which includes requirements at day and night time.
4. It was argued that the spread of information regarding the consultation needed to be shared more effectively with district and boroughs.
5. A Member of the Committee commented that the evidence from the plan shows that it would take longer to respond to a night time call after the proposals are introduced. The Director of Community Protection & Emergencies stated that the message going to the public is that there would not be a change to response times. It was explained that getting to fires faster did not always save lives and hence the importance of prevention firstly and foremost. Referring back to the Equality Impact Assessment attached to the Plan, the Member reiterated that under the proposals on average a first appliance will arrive at an incident later. The Member felt it was important for the service to be upfront with the public about this.
6. Some Members were of the view that the service should be focusing on the improvements that would be gained by the proposals rather than potential savings. The Director of Community Protection & Emergencies was clear that this was not about cuts but delivering a

more efficient and effective service. The Cabinet Member added that changing the current model allows the service to meet emerging dangers such as water deaths and put forward an optimum model.

7. A Member of the Committee stated that he had spoken to local people at local meetings and had no negative comments regarding the proposals. The important message is to stop fires happening in the first place.
8. The Chairman specified that it was the role of the Working Group to arrive at their own conclusions and present recommendations to the Committee in September ahead of the item being considered by Cabinet. The basis of the discussion in September would be around the Working Group's recommendations.

Resolved:

The Communities, Environment and Highways Select Committee acknowledges the progress of the Fire Transformation Working Group in undertaking its review and agrees for the Working Group to return to the Select Committee in September with final recommendations.

7 FORWARD WORK PROGRAMME [Item 7]

Declarations of interest:

None

Key points raised during the discussion:

1. Following a request from the Leader, the Chairman asked the Committee if they were minded to establish a task and finish group named clean, green and safe communities to look at environmental matters. A Member of the Committee was of the view that this group should be renamed to reflect what the group was planning to do primarily climate change. Nine Members of the Committee were in support of this task group being set up and one Member of the Committee abstained from voting on this. The Member that abstained from the vote asked for the notes from the induction meeting which took place earlier in the morning to be shared with the Committee which would explain why the Member was abstaining.
2. In regards to the forward work programme, a Member asked if there could be a discussion on the 20mph policy, the sale of the Surrey Fire and Rescue HQ in Reigate and the potential of using electric fire engines going forward. Another Member of the Committee explained that the 20mph policy took effect from the speed policy and the policy as a whole would need to be reviewed.
3. It was argued by some Members that the following should be considered by the Committee going forward; the councils asset policy, pollution outside schools, airport expansions and the impacts on Surrey. The Chairman stated that both pollution outside schools and airport expansion could be included within the terms of reference of the clean, green and safe communities task and finish group.
4. The progress of the countryside strategy was queried.
5. Members were supportive of the asset and place strategy being included on the Committees forward work programme.

Resolved:

For a clean, green and safe communities task and finish group to be set up.

8 DATE OF NEXT MEETING [Item 8]

The next meeting of the Select Committee will be held on 19 September 2019 in the Ashcombe Suite, County Hall, Kingston upon Thames.

Meeting ended at: 15:17

Chairman

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Communities, Environment and Highways Select Committee

19 September 2019



Surrey Fire and Rescue Service Transformation Working Group Final Report

Purpose of report:

To provide the Communities, Environment and Highways Select Committee with a detailed report on the findings and recommendations of the Fire Transformation Working Group which was set up to review the 'Making Surrey Safer-Our Community Safety Plan' which proposes a number of changes to the way Surrey Fire and Rescue Service operates.

Acknowledgements:

Members would like to take this opportunity to thank all who have taken time to share their experiences with the Working Group which has helped to shape the findings of this review.

Any errors, factual inaccuracies or inconsistencies contained within the report are the responsibility of the Fire Transformation Working Group alone and not of those who contributed their knowledge, insight and experiences to the formation of this report.

Recommendations:

The Fire Transformation Working Group recommends that:

- i. By 1 April 2020, the Cabinet Member for Community Safety, Fire and Resilience to ensure that the new proposed crew and vehicle placement model as detailed within the 'Making Surrey Safer-Our Community Safety Plan' is resourced at full establishment firefighter (including on-call) staffing levels and for staffing levels to be closely monitored by the service to ensure these do not fall below establishment levels.
- ii. Emergency response times are closely monitored and scrutinised by the Communities, Environment and Highways Select Committee on a quarterly basis to ensure that response times which do not meet current and future Surrey response standards can be addressed by further appropriate scrutiny.
- iii. If the 'Making Surrey Safer-Our Community Safety Plan' is approved by Cabinet, that Senior Managers continue to engage with staff to discuss the impact of the changes on working

patterns and give staff the opportunity to comment and shape the design of the service.

- iv. The service must aim to recover costs from incidents which do not fall within the services statutory obligations. By 1 April 2020, a detailed schedule of charging for incident attendances is drafted to recover costs from incidents which do not meet the services statutory obligations especially in cases of persistent false fire alarms.
- v. The Surrey Fire and Rescue Service statement of assurance is scrutinised by the Communities, Environment and Highways Select Committee in 2020 so the Committee can be confident that the service has the appropriate arrangements in place to deliver services safely and effectively.
- vi. All future public consultations and any associated documents are made accessible in a variety of formats to a wide range of people with differing needs including those with mental health support needs, learning difficulties and physical, sensory or cognitive impairments. It is recommended that the council works closely with organisations and groups that represent disabled people to pilot the accessibility of documents before any future public consultations are launched.

Introduction:

Context

1. At its meeting on 5 December 2018, the Environment Select Committee received a formal report from the Surrey Fire and Rescue Service (SFRS) on the performance of the service which included a brief update on the inspection undertaken by Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS). The inspection findings and report can be found at the following link, <https://www.justiceinspectrates.gov.uk/hmicfrs/publications/frs-assessment-2018-19-surrey/>.
2. It was apparent at this meeting that the service needed to transform. The Committee were informed of proposals for a service wide transformation programme designed to deliver the new Community Vision for Surrey 2030, address the findings of the HMICFRS inspection and the Governments Fire and Rescue reform agenda. At this meeting Members formally agreed to convene a Working Group to support the SFRS on its journey of transformation.
3. Surrey County Council is undertaking a large scale transformation programme to reform the function, form and focus of the organisation and improve service delivery to residents and deliver value for money. The transformation programme will support the council in achieving the outcomes in the [Community Vision for Surrey in 2030](#). A number of business cases based on six thematic

areas have been identified and will help the council deliver the Vision for Surrey in 2030. Within this, a business case to improve the fire service has been created.

The Working Group

4. A Working Group was formally established by the Environment Select Committee at its meeting on 22 February 2019 with a specific remit to scrutinise and review the details of the 'Making Surrey Safer- Our Community Safety Plan'¹ to ensure the plan and proposals are fit for purpose and support the needs of Surrey residents. Following the conclusion of its scrutiny, the Working Group would make recommendations to the Cabinet. The Terms of Reference for the Fire Transformation Working Group are attached as Annex 1 to this report and provide a detailed outline of the scope and remit of the Working Group.
5. The Membership of the Working Group was agreed as the following:
 - Saj Hussain (Chairman)
 - Jan Mason
 - Tina Mountain
 - Chris Botten
 - Amanda Boote
 - Marisa Heath

In May 2019, a new Select Committee structure was introduced to the council and the Environment Select Committee was replaced by the Communities, Environment and Highways Select Committee. Due to personal circumstances and the change of the committee structure, the Membership of the Working Group has not been consistent and attendance at witness sessions has not always been 100%. Only Saj Hussain and Jan Mason form the current Membership of the Communities, Environment and Highways Select Committee. The following Members have been present at the majority of Working Group meetings- Chris Botten, Jan Mason and Tina Mountain. The Chairman, Saj Hussain has been present at all Working Group meetings.

6. The Working Group initially met on 14 March 2019 to agree the group's work programme, proposed key lines of enquiry, the methodology for interacting with witnesses and the format of witness sessions. At this meeting it was agreed that qualitative research methods would be the best means in which to engage with witnesses and would help Members gain a deep and meaningful insight into the views of witnesses.
7. This report will provide details of the key themes and discussions that have taken place with witnesses over a four month period on the 'Making Surrey Safer- Our Community Safety Plan'. Views collated from witness sessions have been considered by the group

¹ https://www.surreycc.gov.uk/_data/assets/pdf_file/0020/190154/CS4015-Fire-Community-Safety-Plan_v5.pdf

and a set of recommendations have been agreed for consideration by the Select Committee and Cabinet in September 2019.

Engaging with Key Stakeholders

Process for engagement

8. The Working Group met numerous times since it was first established hearing evidence from a diverse range of stakeholders in an effort to understand individuals and groups experiences of the Fire Service and views on the proposals contained within the 'Making Surrey Safer-Our Community Safety Plan'. Taking into account the Working Groups timescales for conducting research and meeting with stakeholders as described in Annex 1, the Working Group has sought evidence from a range of perspectives in an attempt to ensure that the outcomes from its work are both objective and balanced including Voluntary, Community and Faith Sector (VCFS) organisations, business groups and nature and conservation groups. The majority of those who have responded to the Working Groups call for evidence either have a keen interest in the Fire Service and/ or are impacted by the proposals contained within the document.
9. As explained in the introduction the Working Group had an initial meeting on 14 March 2019 to review the 'Making Surrey Safer-Our Community Safety Plan' and identified and agreed key lines of enquiry to use when meeting stakeholders. As a starting point it was agreed that each stakeholder the Working Group met with would be questioned using the same key lines of enquiry with an opportunity to ask supplementary questions.
10. The following lines of enquiry were formulated and agreed by the Working Group and were shared with witnesses in advance of meetings:
 - a. How confident are you that the needs of the most vulnerable residents in Surrey have been addressed within the Community Safety Plan?
 - b. Is the community safety offer being proposed ambitious enough? Cambridgeshire Fire and Rescue Service has appointed a community engagement and positive action officer to improve engagement with people who it has found harder to reach.
 - c. What are your views on charging for non-emergencies (e.g. freeing trapped animals)? Do you think the service should adopt a formal cost recovery scheme?
 - d. How confident are you that the proposed response model (crewing and vehicle placement) is right for Surrey and will not have any adverse impact on the Fire and Rescue Service's ability to respond to emergencies? What actions will be taken to mitigate any risks?
 - e. Successful Community and Business Safety initiatives require strong partnership working. Do you think that partnership working can be strengthened any further within the Community Safety Plan?

11. Various methods were used to engage with stakeholders. The democratic services social media Twitter account was used to put out calls for evidence to residents. A call for evidence was also sent to the Surrey Community Resilience Forum and VCFS Infrastructure Organisations operating within Surrey County Council. An email was sent from the Chairman of the Working Group to all County Councillors twice asking for suggestions of any organisations and groups the Working Group should make contact with to support this piece of work.
12. Understanding witnesses time commitments, sessions took place around the county with Members travelling to the preferred location for witnesses.

Limitations

13. It is important to note that during the period the Working Group was gathering evidence a public consultation on the 'Making Surrey Safer-Community Safety Plan' was also taking place. This opened on 4 March 2019 and closed on 26 May 2019. As both pieces of work were taking place simultaneously there is a possibility that some witnesses may have found it more appropriate to respond directly to the SFRS public consultation rather than the Working Groups call for evidence.

Methodology

14. Specific organisations and groups identified in the Working Groups Terms of Reference were contacted on an individual basis asking if they would like to meet with the Working Group to consider the 'Making Surrey Safer-Our Community Safety Plan'. A total of 15 organisations and groups were contacted, of these 10 agreed to meet with the Working Group. Democratic Services followed-up with those who did not respond to the original call for evidence for a response. Relevant documents associated with the plan and the lines of enquiry were sent to stakeholders before meetings took place. Those unable to meet with the Working Group were given the opportunity to submit evidence through various methods which would then be shared with the Working Group for review. The Working Group met with the following stakeholders.

Table 1: Stakeholder engagement

Stakeholder Name	Organisation	Date of Meeting
SFRS Leadership Team (Steve Owen-Hughes, Sabrina Cohen-Hatton, Julie Pickford)	Surrey County Council	27 March 2019
Lee Belsten	Brigade Secretary, Surrey Fire Brigades Union (FBU)	10 April 2019

Clare Burgess	Chief Executive, Surrey Coalition of Disabled People	29 April 2019
Louise Punter	Chief Executive, Surrey Chambers of Commerce	7 May 2019
Hugh Bryant	Vice-Chairman, Esher and Walton Labour Party/ Manager, Cobham Area Foodbank	7 May 2019
Amanda Carcary	Senior Emergency Response Officer, Red Cross	7 May 2019
Alan Palmer	Chairman, Walton on Thames Trading Alliance/ Secretary of the UK Fire Association	7 May 2019
Paul Couchman	Secretary, Save our Services Surrey/ Secretary of UNISON	14 May 2019
Neil Odin	Chief Fire Officer, Hampshire Fire and Rescue Service	11 June 2019
SFRS Staff Members (6 Members of staff including front line and back office staff)	SFRS	14 June 2019
SFRS Leadership Team (Steve Owen-Hughes, Sarah Kershaw, Bernie Beckett) and the Cabinet Member for Community Safety, Fire and Resilience	Surrey County Council	22 July 2019

15. The Working Group heard the views of 17 stakeholders between March and July 2019. For a small Working Group with limited resources, Members were satisfied with the number of stakeholders that came forward. Numerous attempts had been made by the Working Group to engage with the various stakeholders impacted by the proposals, not all successful. Where engagement has not been possible, further attempts have been made by the Working Groups Support Officer to engage with these stakeholders.

16. Importantly, Members have been exposed to a diverse range of perspectives due to the willingness of the stakeholders listed to share their views with the Working Group. This has contributed to the Working Group making informed, balanced and robust findings.
17. As explained in paragraph 10, all witnesses were presented with key lines of enquiry prior to face to face witness sessions taking place. The responses to these key lines of enquiry were varied with some lines of enquiry receiving more in depth comments and feedback than others. The next part of this report will review the key themes arising from the key lines of enquiry presented.

Key themes emerging from the Key Lines of Enquiry

How confident are you that the needs of the most vulnerable residents in Surrey have been addressed within the Community Safety Plan?

18. The majority of the witnesses the Working Group spoke with were not confident that the needs of the most vulnerable had been addressed within the 'Making Surrey Safer- Our Community Safety Plan'. This was because the early draft of the Equality Impact Assessment ²(EIA) and the Plan did not contain the details of how potential negative impacts of the proposals on residents and service users with protected characteristics (including the disabled) would be mitigated.
19. This issue was raised with the service by the Working Group. In response the service stated that at the time the public consultation had gone live, the EIA was a work in progress and was being updated by the service with details on mitigation measures for people with protected characteristics. Mitigation measures had now been included within the updated EIA.
20. Witnesses also raised concern around the changes to response times under the new proposed plan and the impacts this would have on vulnerable residents. In particular that with night time response cover, on average a first appliance would arrive at a critical incident 38 seconds later under the plan. This concern was raised with the service who explained that even with a 38 second delay, the service would still be meeting the Surrey Fire and Rescue response standard which is to have a fire engine at a critical incident within 10 minutes from when the crew is alerted, and the second engine at the incident within 15 minutes.
21. Members were assured that the proposed crew and vehicle placement model and was based on a revised Community Risk Management Profile. Members were informed that with the proposals for more investment in business and community prevention work through the Making Surrey Safer Plan, the number

² https://www.surreycc.gov.uk/_data/assets/pdf_file/0003/190533/Draft-Equality-Impact-Assessment-Making-Surrey-Safer-2019-FINAL-15.04.19.pdf

of incidents should decrease over time and vulnerable residents would be targeted within the business and community safety offer.

22. The Working Group recognise that a key issue for witnesses on this specific line of enquiry has been the increase to night time response times under the proposed model and the impacts this would have on residents. To this end, the group has recommended that response times are closely monitored and scrutinised by the relevant Select Committee on a quarterly basis and response times which do not meet Surrey standards are escalated to the appropriate authority for immediate investigation.

Is the community safety offer being proposed ambitious enough? Cambridgeshire Fire and Rescue Service has appointed a community engagement and positive action officer to improve engagement with people it has found harder to reach.

23. There was not a great deal of feedback in relation to this line of enquiry with the majority of witnesses being supportive of the proposed business and community safety offer and additional resource being put into the business and community safety service. There was a recognition that there had been a drop in the investment in this service over the years with the schools programme being significantly reduced. The Working Group were informed that only the 11 Surrey SEND schools were visited as part of a formal programme in the current year.
24. As part of the business and community safety offer, witnesses referenced the need for the service to promote the work of the Surrey Fire Volunteer service and also the volunteering opportunities open to members of the public which in turn could support with the business and community safety offer. At one of the witness sessions, a witness explained that the best person to help a disabled person is a disabled person.
25. The Working Group support increasing resource for business and community safety but also recognise that the proposals being put forward by the service are ambitious and are therefore keen to ensure the service has the right amount of resource in place to manage the programme effectively.
26. At a meeting with officers on 22 July 2019, Members were presented with the current and draft proposed operational model for the Service which showed at the time a proposed additional 57 posts in the Business and Community Safety teams. Details of staffing proposals will be developed further once the 'Making Surrey Safer-Our Community Safety Plan' is considered by Cabinet.

What are your views on charging for non-emergencies (e.g. freeing trapped animals)? Do you think the service should adopt a formal cost recovery scheme?

27. This line of enquiry created the most amount of discussion in meetings with witnesses. The majority of witnesses supported the recovery of costs from non-emergencies which did not fall within the service's statutory obligations but importantly recognised that recovering costs needed to be addressed on a case by case basis.
28. As an emergency service, many witnesses associated the Service with humanitarian causes such as freeing trapped animals and were therefore of the view that universal cost recovery should not be introduced across the service as a whole.
29. Witnesses were more supportive of the service recovering costs from persistent false automatic fire alarms and argued that cost recovery should be judged on a case by case basis especially in cases where vulnerable people are involved and where situations are out of people's control.
30. With the increasing financial challenges the council faces and the costs associated with operating a pump the Working Group agreed that recovering costs should be prioritised by the Service and a detailed schedule of charging for incident attendances is drafted to recover costs from incidents which do not meet the services statutory obligations. The Working Group was of the view that over time, cost recovery would begin to promote behaviour change amongst service users.

How confident are you that the proposed response model (crewing and vehicle placement) is right for Surrey and will not have any adverse impact on the Fire and Rescue Service's ability to respond to emergencies? What actions will be taken to mitigate any risks?

31. This line of enquiry was the most discussed. The majority of witnesses were unhappy with the proposed response model within the 'Making Surrey Safer- Our Community Safety Plan' and in particular the changes to night time cover which would see the number of appliances at night reducing from 30 to 23 (13 wholtime and 10 on-call appliances). The increase response times at night under the proposed plan created universal concern amongst witnesses.
32. With population growth, people living for longer independently and the requirement for additional homes across the county, there was concern from witnesses that if emergency incidents occurred simultaneously across the county at night, there would be a delay in response times due to the number of appliances being available.
33. A number of witnesses working within the Service, informed the Working Group that the fire service was currently operating under establishment figures. Although a recruitment drive was under way, witnesses were concerned that in the future night time appliances and in particular on-call appliances would not be resourced appropriately due to staff shortages.

34. The HMICFRS inspection report rated the Service as *inadequate* at making the best use of its resources and recommended that the Service ensure that its resourcing model meets risk demand sustainably³. As a result of this recommendation, Members were informed by officers that the Service had undertaken detailed risk analysis and response modelling, the latter of which has been externally verified by Cadcorp and concluded that there was currently more resource at night than was required. Members were informed that although there would be a decrease of seven appliances during night time, the service was confident that appliances would still arrive at incidents within the Surrey response standard. The mobilising system which sends the nearest fire engine to an incident would ensure the fastest response time.
35. Although the Working Group felt confident with the response modelling undertaken by the service, on behalf of the public, the group request further assurance that the proposed vehicle and crew placement model is fully staffed at the correct staffing levels when the proposed model is implemented in April. This was supported by the HMICFRS inspection report finding which stated that the service over-relied on staff overtime and needed to ensure appropriate resource was in place to respond to risk.
36. As a result, the Working Group recommend that the proposed crew and vehicle placement model as detailed within the 'Making Surrey Safer-Our Community Safety Plan' is resourced at full establishment firefighter (including on-call) staffing levels and for staffing levels to be closely monitored by the service to ensure these do not fall below establishment levels. Many of the witnesses the group spoke with were supportive of this recommendation as it would ensure further resilience to the proposed crew and vehicle placement model.

Successful Community and Business Safety initiatives require strong partnership working. Do you think that partnership working can be strengthened any further within the Community Safety Plan?

37. Many of the witnesses the group met with were unaware of partnership working being undertaken by the Service to strengthen business and community safety initiatives. The Service recognised that over the years the amount of resource being put into business and community safety initiatives had significantly reduced which had impacted on work with partners.
38. Some witnesses the group met with commented that they had not had any contact with the Service for a number of years and the public consultation on the 'Making Surrey Safer-Our Community Safety Plan' was the first communication from the service for a

³ <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/surrey-fire-and-rescue-service-report-2018-19.pdf>

long time. Witnesses were open to meeting with the Service to promote business and community safety initiatives and strengthen partnership working.

39. The 'Making Surrey Safer-Our Community Safety Plan' makes reference to the Surrey Fire Volunteers which has been set up to help the fire service engage more effectively with local communities and support the delivery of community safety activity but many of the witnesses the group met with were unaware of this volunteering initiative.
40. Initiatives organised by the Service such as 'Safe Drive Stay Alive'⁴ where a series of live educational performances featuring a sequence of films and live speakers were welcomed for the impact they made to the prevention agenda and the wider partnerships they created.
41. The group were informed at a meeting with officers on 22 July that the community safety offer would be developed and increased across a broad range of stakeholders in community education and community safety partnerships including the NHS and Schools.
42. There was consensus that for the 'Making Surrey Safer-Our Community Safety Plan' to be successful there needed to be a drive towards strengthening existing and building on partnership arrangements.

Other issues raised in witness sessions:

43. During witness sessions a number of other issues were raised by witnesses. This next section will touch upon these issues.

Accessibility of consultation documents

44. A witness representing disabled residents who was invited to a witness session informed Members that the consultation documents that had been launched as part of the public consultation had not been widely accessible to a range of residents with various physical, sensory and cognitive impairments. The group were informed that for the visually impaired, pdf documents did not work well with screen readers and the details within the document to contact the contact centre for an alternative format would not have been accessible by the screen reader.
45. Red text was widely used within the consultation documents for headings. Both red and green are two colours that are very difficult for anyone with Optic Nerve damage. Therefore a plain text version (e.g. black, unedited text) would be required by anyone with optic nerve damage or any degree of colour blindness. A plain text

⁴ <https://safedrivesurrey.org/>

version of the consultation document would allow the user to increase the document font size as per their specific requirements.

46. It was recommended that an easy read and plain text version of the consultation document were added to the website urgently so those with special requirements could access the document and respond to the public consultation. This request was raised by the Working Group with officers and the Cabinet Member for Community Safety, Fire and Resilience. An easy read and plain text version of the consultation documents were added to the public website alongside a screen reader friendly version of the document although this did take some time to upload.
47. The witness recommended that going forward the accessibility of documents should be piloted with various groups representing the voices of disabled people before consultations are formally launched.
48. To ensure that those with disabilities are not hindered in any way from partaking in public consultations which impact vital services, the Working Group agreed that all future public consultations undertaken by the council and any associated documents are made accessible in a variety of formats to a wide range of people with differing needs including those with mental health support needs, learning difficulties and physical, sensory or cognitive impairments before consultations are formally launched.
49. The group also recommended that the council works closely with organisations and groups that represent disabled people to pilot the accessibility of documents before any future public consultations are launched.

Finances

50. A number of witnesses the group met with discussed the savings to be achieved from the 'Making Surrey Safer-Community Safety Plan'.
51. The consultation document stated that changes to the response model would reduce expenditure by circa £3m per annum with the increased resource needed to undertake community safety increasing expenditure by £1-1.5m per annum. This would leave a saving of around £1.5-2m. A number of witnesses queried what would happen with this saving and if it would be re-invested back into the service.
52. This point of discussion was raised with officers who confirmed that savings made by services were not automatically re-invested into services in which the saving was identified and would be used to balance the council's budget. At a meeting with officers on 22 July, the group were informed by the Director for Community Protection and Emergencies that the 'Making Surrey Safer-Our Community

Safety Plan' was intended to address the outcome of the HMICFRS inspection and that in reality there would be no significant savings from the proposals.

53. The group were informed that the Executive Director for Resources would be reviewing the budgetary information and proposals within the 'Making Surrey Safer- Our Community Safety Plan' ensuring the plan was financially resilient before submission to Cabinet.

Conclusions of the Working Group:
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54. Throughout the course of its work, the Working Group have received a valuable amount of evidence from witnesses on the 'Making Surrey Safer-Our Community Safety Plan' and the impacts proposals would have on residents and stakeholders. The Working Group would like to thank all who have taken time to engage with the group and share their experiences.
55. The Working Group focused on five key lines of enquiry to focus questioning for witnesses, the responses to these lines of enquiry have been summarised in the report. The evidence heard at witness sessions has helped the group formulate a series of recommendations for consideration by the Select Committee and Cabinet.
56. The recommendations agreed by the Working Group are based on the key themes raised by witnesses and the frequency with which these were reported throughout witness sessions. These recommendations are also those that meet the SMART (specific, measurable, achievable, and realistic, timebound) criteria and will help deliver assurance to residents and stakeholders on the proposed changes to the Surrey Fire and Rescue Service.
57. From the evidence received it is clear that residents and stakeholders need reassurance that any new proposed crew and vehicle placement model introduced is staffed at full establishment numbers. To give extra reassurance, the group will ensure that the relevant Select Committee closely scrutinise emergency response times and the services statement of assurance.
58. For the Service to effectively transform the delivery of services, engagement between staff and senior officers within the service is critical. From the witness sessions, it was clear to the group that communication and culture between staff and senior officers within the service needed transforming. Looking ahead, staff need to be given the opportunity to comment and help shape the design of services.

59. Witnesses were supportive of the Surrey Fire Volunteers and agreed that the service should promote this further with the public as part of its community protection agenda. There was also support for the service to look to recover costs from incident attendances that did not fall within the services statutory obligations. Although there was consensus that each incident needed to reviewed on a case by case basis.
60. To ensure the council fully engages with all groups within local communities, it is imperative that all future public consultations take account of the importance of making public consultation documents fully accessible.
61. The Working Group is confident that the recommendations contained within this report will help strengthen the 'Making Surrey Safer- Our Community Safety Plan' and would like to give residents the assurance that the proposed plan will be closely monitored and scrutinised. The Working Group look forward to supporting Surrey Fire and Rescue Service through its journey of transformation.

Next Steps

62. The Working Group's report will be considered by the Communities, Environment and Highways Select Committee on 19 September and recommendations will be submitted to Cabinet on 24 September.

Report author: Saj Hussain, Chairman of the Fire Transformation Working Group

Report contact: Huma Younis, Democratic Services Officer

Contact details: 020 8213 2725, huma.younis@surreycc.gov.uk

Sources/background papers:

HMICFRS- Effectiveness, efficiency and people 2018/19 - Surrey Fire and Rescue Service

Community Vision for Surrey in 2030

Surrey Fire and Rescue Service Statement of Assurance- February 2019

Surrey Fire and Rescue Service Community Risk Management-
February 2019

Environment Select Committee- Minutes, 5 December 2018

Annexes:

Annex 1- Fire Transformation Working Group Terms of Reference

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Surrey Fire and Rescue Service Transformation

Working Group

Terms of Reference

The process for establishing a Working Group is as follows:

1. The Select Committee identifies a topic that requires detailed consideration and examination.
2. The Select Committee Chairman and Democratic Services Officer (DSO) complete the scoping template.
3. The Corporate Overview Select Committee reviews the scoping document
4. The Select Committee agrees membership of the Working Group.

Review Topic: Surrey Fire and Rescue Service Transformation

Select Committee: Environment Select Committee

Relevant background:

On 9 October 2018, County Council endorsed a new shared Community Vision for Surrey in 2030¹. The Community Vision for Surrey includes a number of ambitions for people and place. Significantly the Vision recognises the need to transform the way the council delivers its services and outcomes for residents. To support the Community Vision, Surrey County Council will embark on a journey of transformation which focuses on reforming the way outcomes are delivered and changes the way we work to ensure we are doing the very best we can for our residents. A transformation programme with a number of business cases, focused on the following six themes: Service Transformation, Partnership and Integration, New Ways of Working, Commissioning, Investment & Income and Technology and Digital Innovation, was approved by Council in November 2018².

On 5 December 2018, the Environment Select Committee was briefed on the performance of the Surrey Fire and Rescue Service (SFRS). At this meeting, the SFRS transformation Business Case was also presented to Members for scrutiny³. The Committee were made aware that a number of transformational changes would be required for the service to improve current performance standards. The Committee raised concerns around the performance of SFRS and agreed that a working group be set-up to support and scrutinise the service as it embarks on its transformation journey. On 20 December 2018, HMICFRS (Her Majesty's Inspector of Fire & Rescue Services) released results of its annual assessment (effectiveness, efficiency and people) of SFRS⁴. Inspectors raised concerns around the performance of SFRS in keeping people safe and secure. In particular, there were serious concerns about the service's effectiveness and efficiency.

Work themes include, supporting the development of the Integrated Risk Management Plan (IRMP), scrutinising community protection activity, reviewing partnership working arrangements and improving and developing the culture within the Fire Service.

¹<https://mycouncil.surreycc.gov.uk/documents/s51123/Item%2011%2020180927%20Report%20for%20Council%20on%209%20October%202018%20Council%20vision%20partnership%20commitment%20and%20deal.pdf>

² <https://mycouncil.surreycc.gov.uk/documents/s51906/Item%209%20-%20Council%20report%2013%20November%202018-%20organisation%20strategy%20PFS%20transformation%20and%20people%20stra.pdf>

³ <https://mycouncil.surreycc.gov.uk/ieListDocuments.aspx?CId=712&MId=6539&Ver=4>

⁴ <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/surrey-fire-and-rescue-service-report-2018-19.pdf>

The group's role will be to ensure that ambitions set out in the Vision for Surrey in 2030 are embedded into the SFRS. The working group will act as a 'critical friend' to the service and will support the service throughout its journey of transformation. Recommendations from the group will be submitted to the Environment Select Committee and Cabinet where necessary.

Why this is a scrutiny item

SFRS is a universal service which impacts all residents. The nature of the work carried out by the service means the service is critical to Surrey's most vulnerable residents. As a result, residents support the SFRS and value the role they play in protecting the public.

Staff Feedback

The Surrey Residents' Survey found that between 2016/17, over 78% of residents were very satisfied/ fairly satisfied with the fire and rescue service⁵. On the other hand, only 40% of staff within the service responded to the staff survey, the lowest response rate amongst the major areas of the Council. There were a number of negative responses received within each of the eight key areas of the survey including concerns with senior leadership and limited opportunities to grow within the service. As a service which impacts so many different people, it is critical that scrutiny is undertaken to help drive improvements in the service which will in turn promote community well-being and improve the quality of life for residents.

Service Performance

The HMICFRS annual inspection report *states, "We have concerns about the performance of Surrey Fire and Rescue Service in keeping people safe and secure. In particular, we have serious concerns about the service's effectiveness and efficiency.... the service is inefficient at keeping people safe from fires and other risks. This is particularly so in how it uses its resources. But the service should also be more affordable..... the service needs to improve how it looks after its people"*. A number of concerns around the performance of SFRS have been raised in the HMICFRS annual inspection. It is clear, that scrutiny of SFRS from the Select Committee has been ineffective with Members not providing constructive and purposeful challenge to the service in recent years. The Working Group now has the opportunity to actively engage in the scrutiny process and drive improvements with SFRS. A number of key concerns highlighted in the report will be investigated by the Working Group as part of its proposed work plan. The services response to addressing HMICFRS concerns will be vigorously examined to ensure concerns are being addressed by the service at a swift pace.

Financial Challenges

Scrutiny Members have a key role in ensuring that the Councils financial resources are allocated and prioritised accordingly and represent value for taxpayer's money. In this respect Members are responsible for scrutinising the Councils budget position and have a detailed understanding of the financial issues facing the council. The fact that the inspection identified the need for the service to make better use of its resources underlines the need for detailed financial scrutiny.

The working group will utilise its role as a critical friend to challenge policy-makers and decision-makers and drive service-wide improvements. As independent minded Councillors with close community links, the working group has a unique role in being able to ensure that the voice of everyone impacted by SFRS including staff and local communities is heard.

⁵ <https://www.surreyi.gov.uk/dataset/surrey-residents-survey-annual-data-satisfaction>

Aim

By acting as a critical friend the Working Group aims to support the SFRS to improve its performance, raise staff morale and achieve its transformation into an efficient and effective Fire and Rescue Service.

What questions are the group aiming to answer?

1. Is the transformation delivery plan fit for purpose and realistic in terms of what can be achieved?
2. How do residents view the SFRS?
3. How are resources managed and prioritised by the service?
4. What prevention activity currently takes place with local communities and how can the service better reflect the local communities it serves?
5. How is the SFRS service and leadership viewed by its staff and why? Are staff clear on the objectives and aims of the service?
6. How is the Service addressing concerns raised within the HMICFRS inspection report?

Aspirations

- Support the delivery of the Fire Service Transformation Programme;
- Ensure the concerns raised in the HMIC inspection report are actively being addressed and as a result, improvements to the service are being made;
- Increase prevention activity undertaken by the service and resident and community participation and engagement with SFRS;
- Understand how staff workforce policies and strategies can support staff wellbeing better;
- Increase and strengthen partnership working arrangements.

Scope (within / out of)**In scope:**

- Plans, policies and changes to service levels as a result of transformation
- SFRS Budgets
- Emergency Management Team in context of wider community safety offer
- Voluntary & Community Services

Out of scope:

- Community Safety Partnerships
- Wider Council Transformation Programme
- Office of the Surrey Police and Crime Commissioner
- Surrey Local Resilience Forum

Outcomes for Surrey / Benefits

The Group ensures that SFRS supports the Councils transformation programme and budget position, achieving ambitions within the Vision for Surrey 2030;

The Group ensures that SFRS contributes and utilises partnership working arrangements with other Fire Services and blue light services;

The Group to make certain that SFRS becomes a proactive service which has a good understanding of risk within its local communities and actively engages with residents and businesses;

The Group to make certain that SFRS becomes a service which is well respected amongst all and a service that promotes a supportive culture of inclusion, transparency and respect.

Proposed work plan

The Group will make recommendations after each stage of the proposed work plan.

Stage 1 (IRMP)

Timescale	Task	Responsible
February 2019	Hold meeting with Working Group Members and officers to define scope, work plan and desired outcomes.	DSO
March	Meet with officers to review the draft IRMP out for public consultation.	SFRS
March-May	Group to conduct research on the draft IRMP- including meeting with witnesses and stakeholders.	Working Group
May	Meet with officers to review IRMP public consultation feedback.	DSO/SFRS
June	Hold meeting with Group to identify areas for recommendation.	DSO
June- July	Compile report to Select Committee for consideration.	Working Group
Aug-Sept	IRMP to Cabinet for decision.	SFRS

Potential Witnesses

Cabinet Member for Community Services

Executive Director for Highways, Transport and Environment

Director of Community Protection and Emergencies

Service Users (including residents and businesses)

Surrey Fire Volunteer Service

Surrey Fire and Rescue Staff (including firefighters, on-call firefighters, senior management and back office staff)

Fire Brigades Union (FBU)

National Fire Chiefs Council

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)

East Sussex Fire and Rescue Service, Chief Fire Officer

West Sussex Fire and Rescue Service, Chief Fire Officer

Useful Documents

Surrey County Council- A Community Vision for Surrey in 2030

<https://mycouncil.surreycc.gov.uk/documents/s51123/Item%2011%2020180927%20Report%20for%20Council%20on%209%20October%202018%20Council%20vision%20partnership%20commitment%20and%20deal.pdf>

Surrey County Council- Transformation Programme

<https://mycouncil.surreycc.gov.uk/documents/s51906/Item%209%20-%20Council%20report%2013%20November%202018-%20organisation%20strategy%20PFS%20transformation%20and%20people%20strategy.pdf>

HMIC Effectiveness, efficiency and people 2018/19 Annual Assessment– Surrey Fire and Rescue Service- <https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/surrey-fire-and-rescue-service-report-2018-19.pdf>

Surrey Fire and Rescue, Public Safety Plan (2016-25)

https://www.surreycc.gov.uk/_data/assets/pdf_file/0005/87341/Public-Safety-Plan-2016-to-2025.pdf

Surrey Fire and Rescue, Vision, Mission and Aims

<https://www.surreycc.gov.uk/people-and-community/fire-and-rescue/about/our-vision-mission-and-aims>

Surrey Fire and Rescue, Values and Behaviours

https://www.surreycc.gov.uk/_data/assets/pdf_file/0009/161586/Surrey-Fire-and-Rescue-Services-values-and-behaviours.pdf

Potential barriers to success (Risks / Dependencies)

Officer and Member availability
Ability to engage Service Users and external organisations
Delays with the delivery of the Fire Service Transformation Programme
Number of project work streams to consider

Equalities implications

The Working Group recognises that there are a number considerations around equalities when conducting its work, and there are a number of people with various needs that will be contributing to this process. It will be mindful of how it conducts its work in order to ensure people are provided the opportunity to contribute, and that any barriers to doing so are mitigated.

The Group will monitor the equalities implications emerging from its recommendations with officers, and will work to identify mitigation measures for those with a potentially negative impact.

Task Group Members (5)	Tina Mountain Jan Mason Marisa Heath Amanda Boote Chris Botten Rachael I Lake (ex-officio)
Spokesman for the Group	Saj Hussain
Democratic Services Officer (DSO)	Huma Younis

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Communities, Environment and Highways Select Committee



19 September 2019

Surrey Fire and Rescue Service (SFRS) Making Surrey Safer – Our Plan 2020-2023

Purpose of report:

For the Communities, Environment and Highways Select Committee to scrutinise the 'Making Surrey Safer' plan and review the feedback from the public consultation, making recommendations to Cabinet.

Introduction:

1. The vision of Surrey Fire and Rescue Service (SFRS) is to make Surrey a safer place to live, work, travel and do business. To achieve this in an ever-changing environment, we need to reimagine our service and innovate. This means thinking differently about how we deliver our prevention, protection and response activities and finding better ways of working with partners, residents and businesses. The detail of how we intend to do this is set out in Making Surrey Safer – Our Plan 2020-2023 ("Our Plan"). This is included within this report at Annex 1.
2. There are significant drivers for this change:
 - a) The Government's Fire and Rescue reform agenda sets out how the work of Fire and Rescue Service's needs to change. There has been a considerable reduction in the number of fires across the country (fire incidents have reduced by 45% nationally over the past decade and 30% in Surrey), there is much greater emphasis on prevention and protection activities, and there is a move to a more people centred approach to identifying risk and providing services.

- b) There is a new Community Vision for Surrey in 2030. This puts resident's safety at its core and emphasises the need for prevention activities to improve outcomes.
 - c) Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspection has said that our response to incidents is inefficient (Annex 2). We also do not undertake enough prevention and protection activity to reduce the likelihood of emergencies. This means we need to do more of this in the future. We also need to ensure we are providing an efficient, effective, accountable and transparent service that is reflective of the communities we serve.
3. The Fire and Rescue National Framework for England requires that all Fire and Rescue Authorities produce an Integrated Risk Management Plan, which considers all the fire and rescue related risks that could affect our communities. This is contained in Our Plan and associated appendices. We want to develop a wide-reaching approach to managing risk, not just in the home and workplace but in every place where we can influence behaviour and encourage a safer attitude and environment, whilst still ensuring we respond to emergencies well.
4. Our Plan was consulted on from 04 March – 26 May 2019 and the feedback was broadly supportive of our proposals. A report on the consultation responses, including the survey data and qualitative comments can be found at Annex 3 to this report. The consultation feedback was shared with the Fire Transformation Working Group on 12 July 2019.

Background:

Making Surrey Safer – Our Plan 2020 - 2023

5. Fire and Rescue services undertake three main functions:
- a. **Community Safety** – focuses effort on education and prevention, including raising awareness amongst the most vulnerable in our communities. The aim is to minimise serious injuries and loss of life across Surrey.

educating people and businesses about the risks of fire and other emergencies, and how to prevent them. This will realign our resources to meet the risk in Surrey and this will ensure that we deliver public value.

- b. To increase availability of crews at Haslemere and Walton during weekend days, which will improve our resilience for specific risks including water and wildfire.
- c. To maintain the number of fire stations in Surrey and change how some of them are crewed. Changes are proposed in the Banstead, Camberley, Egham, Fordbridge, Guildford, Painshill and Woking areas. Camberley, Fordbridge, Guildford and Woking will have one immediately available fire engine available at night, rather than two. There will be no station based night time response cover provided from Egham, Banstead and Painshill. Night time cover at these locations would come from neighbouring fire stations. The response time for the first appliance, would continue, on average, to be less than 10 minutes
- d. To further increase the number of On-Call firefighters in Surrey. We will do this by improving the attractiveness of the role and by increasing the area we can recruit from. This will further improve our availability to respond.
- e. To charge for some incidents we attend such as false reports of fire (hoax calls and automatic false alarms) and animal rescues so that we can recover our costs. Wherever possible, we will work with partners, business and animal owners (in particular farmers), to avoid the need to respond to these types of incidents in the first place – handing the incident over to the responsible person(s). This will avoid the need for a charge to be made.

Public Consultation

11. Public consultation took place for 12 weeks from 04 March – 26 May 2019 in accordance with the Surrey County Council Consultation framework. During this period we engaged extensively with the public and with partners using a variety of methods. This included meetings with various community groups, District and Borough briefings, online and targeted social media advertising and in print. The consultation documents were also made available in accessible formats. Based on feedback further additional formats were also provided.
12. The consultation received feedback from over 1,800 individuals and groups, through the consultation survey, letters and face to face engagement events. This represents 0.14% of the Surrey population, which is estimated to be 1,185,300 (*The Office for National Statistics (ONS)*).

Summary of the Consultation Responses

13. Feedback from the consultation has been broadly supportive, in most areas of our proposals, with the exception of the proposed changes to night time response cover. A summary of the key findings are as follows:
 - The majority of people agree with adopting a risk-based approach
 - Most people agree with the proposal to spend more time on prevention and protection activities (Business and Community Safety)
 - The majority of people disagree with the proposal to change how some fire stations are crewed
 - Most people agree with recovering costs from some incidents and to re-invest in SFRS. However, charging for animal rescues was less favoured
 - Most people agree with expanding the recruitment area for On-Call firefighters to aid recruitment

For further detail please refer to the Consultation Report at Annex 3 to this report.

Our response to these key findings:

14. Respondents agreed with adopting a risk-based approach and doing more business and community safety activity, but some were concerned that this was at the expense of emergency response cover. Some respondents also reported the changes to be perceived as cost cutting and wanted more information. Our Plan is based on the resources that we need to provide business safety, community safety and emergency response cover to meet the risk set out in the Community Risk Profile (“CRP”) (Annex 4). To meet this risk, we will invest more in business and community safety and less in response. This will align our resources to meet the risks in Surrey and this will ensure that we will deliver public value.

15. Respondents raised perceived concerns about reductions in staff and fire engines. Some respondents were concerned they may be less safe due to waiting longer for fire engines to arrive at night. Our Plan is based on:
 - a. The recent recruitment of whole-time firefighters so that the Service will be at full establishment firefighter staffing levels by April 2020. If the proposed model is agreed there will be an additional cohort of staff who will either transition into Business and Community Safety or remain in Response. We will continue to monitor our establishment levels on an ongoing basis.
 - b. Active recruitment of firefighters and no redundancies. The focus on prevention and protection will mean we will provide our firefighters with additional training to ensure they have the necessary skills to implement Our Plan.
 - c. Five years of evidence about incidents in Surrey. This includes reviewing our calls which drop significantly at night-time. The data has been used to model the impact on emergency response cover and has been independently verified. The changes will result in a more even distribution of cover across Surrey based on the identified risk.
 - d. Our CRP which contains the most recent data about current and forecasted risks within Surrey. This information helps us to understand where the risks associated with places in the

county are, where the most vulnerable people are and when and where the risks are greater.

- e. A minimum of 20 fire engines to be available during the day. Our new configuration will provide 25 fire engines, 22 of which will be crewed by firefighters that will be available to respond immediately. The remaining 3 will be crewed by On-Call firefighters.
 - f. A minimum of 16 fire engines to be available at night. Our new configuration will provide 23 fire engines, 13 of which will be crewed by whole-time firefighters and will be available to respond immediately. The remaining 10 will be crewed by On-Call firefighters.
 - g. Tried and tested plans that make sure we can always deal with emergencies effectively. We continually monitor all our vehicles around the county, using new technology, so that people and equipment are in the right place at the right time.
 - h. The introduction of new technology and new procedures that will improve response times.
 - i. An increase in the availability of crews at Haslemere and Walton during weekend days, which will improve our resilience for specific risks including water and wildfire.
 - j. Making further improvements to On-Call firefighter attraction, recruitment and ways of working. Due to the current recruitment processes that are being carried out there will be improved availability of On-Call fire engines.
16. We will regularly review our CRP and distribution of resources as population numbers and distribution changes over time, to ensure we are providing adequate resources that continue to meet the risk and changing needs of communities. Our Plan will result in a significant increase in activities including safety visits for every Surrey school and much more partnership working with all boroughs and districts. By increasing our safe and well visits we will be able to target all people with mobility issues, other disabilities or other vulnerabilities. We will do much more to help prevent fires and work with residents and businesses to understand what to do when a fire does occur.

17. There was widespread support from respondents for charging for some services, concerns were raised though, in relation to charging for animal rescues, with respondents fearing their animals may be at risk. Our Plan makes a provision for rescuing animals and we will continue to train our firefighters to rescue animals safely and provide the equipment they need to do so. We do not receive any additional funding to allow us to do this. The National Framework for Fire and Rescue in England makes it clear that any additional activity that services undertake should not be at the expense of effective delivery of their statutory core fire functions. Charging for these types of calls will allow us to recoup some of the cost of doing so, however our focus will be on working closely with our communities (such as farmers) to ensure the right person is attending a call for assistance. Should these proposals be put in place a communications plan will ensure all are aware of the changes and within this a schedule of charges will be made publicly available.

Staff Engagement

18. We have engaged with our staff throughout this process and will continue to do so. Our staff have been given the opportunity for a face-to-face discussion led by members of the Service Leadership Team (SLT). These discussions explained the proposals, the rationale and the potential implications.

19. Staff will continue to be engaged with on an ongoing basis to ensure they are given the opportunity to shape the design of the Service.

Employee Relations

20. There was early engagement with trade union representatives and further opportunity for discussion was offered during the consultation period. The Fire Brigades Union (FBU) has responded formally to the consultation and that response is available on its website. The FBU's submission focused on changes to the response model which it opposes whilst welcoming the approach to business and community safety. There will be ongoing consultation and negotiation, as appropriate with the trade union.

Risk Management and Implications

21. There are associated risks with the implementation of these proposals:

a) Industrial Relations:

Given Our plan will require staff changes and the opposition to elements of it by the FBU, there will be an impact on industrial relations. We will mitigate that impact through on-going dialogue with the trade unions, consulting and negotiating as appropriate.

b) Learning and Development:

The refocus on prevention and protection activities will require upskilling of the workforce in order to deliver it effectively. As a result, there will be a transition period whilst this is embedded which may impact delivery in the short-term. We will mitigate this with a robust transition plan and a programme of training and development activities.

c) Transition of Staff Roles:

The realignment of resources between Response and Business and Community Safety team roles, will require the identification of a number of staff to move from their existing roles. This will impact current shift working patterns. We will mitigate this with a clear selection process for the new roles, allowing preferences and an opportunity to understand impacts from staff personally. Wherever possible, the number of staff moves will be minimised.

d) Public Perception of Response Changes:

The consultation feedback has demonstrated that our communities and partners believe that crews usually respond to incidents from fire stations, and undertake limited other activity when not responding to incidents. We will deliver a proactive communication and engagement plan which clearly describes how our Service operates and what services we offer.

e) Ongoing Capital Investment for Materials:

The increased prevention activities require associated materials to mitigate risks identified in people's homes during Safe and Well Visits, this will require a significant

annual capital investment. We will manage this by robust financial planning and capital business case creation, whilst also looking for opportunities for the sponsorship of these materials.

Equalities and Diversity

22. Valuing and promoting equality and diversity are central to the work of the Service. The ability to protect the public through fire safety advice, fire prevention, fire protection and emergency response depends on understanding the differing needs of our diverse communities and responding appropriately to those needs.

23. In considering Our Plan members must have due regard to the need to advance equality of opportunity for people with protected characteristics, foster good relations between such groups, and eliminate any unlawful discrimination. These matters are dealt with in the attached Equalities Impact Assessment “EIA” (Annex 5) which should be read alongside this report. The assessment is based on the proposals for change. If any changes in service delivery are necessary to implement Our Plan, a further, specific equalities impact assessment will be carried out.

24. The following potential positive impacts to different groups in the community were identified:

It is proposed to increase Safe and Well Visits (SAWVs) from 4,500 to 20,000 by 2021. This has the potential to benefit all members of society. The SAWV is a far more holistic and sophisticated product than the Home Fire Safety Visit that Fire Services have been offering for many years. The SAWV looks at all elements of an individual or family’s lifestyle and circumstances and offers meaningful advice and interventions to help ensure that people not only stay safe in their homes but get wider support in their community to enable them to thrive. This is accomplished by broad collaboration with other agencies, including social services, police and community groups. By giving people the tools they need to live safe lifestyles we can build safe, resilient communities. This has the potential to have a far greater long-term impact than the traditional response-led approach that has been the mainstay of Fire and Rescue Services in the past. In the EIA, the groups that have been identified as likely to receive the greatest benefit from this approach were the elderly, people with

disabilities, and males in certain age groups who are at greater risk from drowning incidents.

The proposed system of Lifelong Learning will expand the potential for positive impacts to all age groups. The resultant community outreach work will benefit people from different religions and ethnicities who may not have been reached by our community safety work in the past.

25. The following potential negative impacts were identified:

The reduction in fire and rescue cover at night could have a negative impact. The EIA has identified certain groups that may be more negatively impacted by these changes than others. These include the elderly, particularly people who live alone who may be at greater risk from fire. This also applies to people with certain disabilities, especially those who have reduced mobility and families with children. Young drivers, who are statistically more likely to be involved in road traffic collisions, especially in the areas of Runnymede and Guildford may also be impacted. This is mitigated through a number of measures that include:

- a. the proposed response model which will efficiently deploy resources to the areas and times of greatest need, based on rigorous independently reviewed modelling.
- b. expanding driver safety initiatives (including the award-winning "Safe Drive Stay Alive").
- c. focussing business safety inspections at tertiary learning establishments.
- d. developing embedded community engagement programmes that focus community safety work on groups and individuals identified as most at risk.

26. Changes to crewing patterns from 'days and nights' to 'days only' will have an impact on staff. There may be positive and/or negative impacts to individuals depending on their personal circumstances. No specific issue has been identified at this stage however there is potential for a greater impact to staff with caring responsibilities who are based at stations where day crewing will be implemented. This will be analysed and then addressed in a separate EIA once the patterns of crewing are known. The findings from the internal engagement programme and focus groups will be used to inform this EIA as well as

outputs from the staff consultation process should the proposals be agreed.

Other Implications:

27. The potential implications for the following council priorities and policy areas have been considered. Where the impact is potentially significant a summary of the issues is set out in detail below.

Area assessed:	Direct Implications:
Corporate Parenting/Looked After Children	No significant implications arising from this report.
Safeguarding responsibilities for vulnerable children and adults	Surrey experiences relatively low numbers of fatalities and injuries from fires. Our challenge is to continue to reduce these small numbers and this means the accurate targeting of those who are most vulnerable. We must also maintain our contribution to the reduction of casualties associated with road traffic collisions and will continue to focus on young drivers. We recognise that we also have an important part to play in improving the life chances for young people, so we deliver a number of other effective prevention activities.
Public Health	Increase integration and meaningful collaboration with other emergency services to assist them to respond to an increasing demand for services, where we can improve community safety and public health, and add value. We continue to educate the public through community safety campaigns and Safe and Well Visits. Our Safe and Well Visit is designed to cover fire safety, road safety, environment safety and by using the One Stop Surrey

	referral process, cover a range of health and social issues that support independent living. We also supply a range of equipment, such as smoke alarms, hard of hearing alarms, fire retardant bedding and advise on TeleCare alarms and sprinklers. We are continuing to work with the Surrey Health and Wellbeing Board members, such as Adult Social Care, the NHS, public health and Age UK Surrey, to develop the content of our Safe and Well Visits to reduce risk to the elderly.
Climate change	The Civil Contingencies Act 2004 places a legal duty on all emergency services to carry out risk assessments in their area. Significant risks are recorded on the Surrey Community Risk Register . We have to assess the risk of major emergency incidents such as flooding, derailments, major spillages, fires, chemical incidents, civil unrest, terrorist attacks and flu pandemics.
Carbon emissions	No significant implications arising from this report.

Recommendations:

- a) That the Select Committee endorse the 'Making Surrey Safer – Our Plan' 2020-23 and recommend the Plan to Cabinet for approval.

Next steps:

- 28. The item will be scheduled for Cabinet on 24 September 2019.
- 29. Once approved, a delivery plan will be implemented, and will take into consideration the actions outlined in the Equality Impact Assessment.

30. Further meetings will be held with the Communities, Environment and Highways Select Committee to update on progress as required.

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Sources/background papers:

Annex 1 – Draft Making Surrey Safer - Our Plan 2020-2023

Annex 2 – HMICFRS Inspection Report

Annex 3 – Full Consultation Report

Annex 4 – Community Risk Profile

Annex 5 – Equality Impact Assessment

[Fire and Rescue National Framework for England](#)

[Fire and Rescue Services Act 2004](#)

[Civil Contingencies Act 2004](#)



Making Surrey Safer

Our plan for 2020 - 2023

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Foreword

Welcome to our Plan

Fire and rescue services in England are constantly striving to ensure that every pound of your money invested in us adds maximum value to your communities. The government's fire and rescue reform programme¹ sets out a clear direction of travel and highlights the challenges we will face in this journey. This is reinforced by a new statutory inspection regime² which checks on our improvement progress, and a refreshed Fire and Rescue National Framework for England³ which explains how our work is changing, in particular the number of fires that we are called to is dramatically reducing.

Surrey County Council, our Fire and Rescue Authority, has set out a new vision for Surrey in 2030, placing greater emphasis on prevention, services for vulnerable people, and the need for greater collaboration with partners.

Fire and Rescue Services play a crucial role in making our communities safer, whether it be preventing and protecting people from fire and other risks or responding swiftly to the emergencies that occur.

Our HMICFRS Inspection last year highlighted that Surrey Fire and Rescue Service (SFRS) are not doing enough to protect people or prevent emergencies from happening, so we will be doing more of this in the future. We also need to ensure that we are providing an efficient, effective, accountable and transparent service that is reflective of the diverse community we serve.

Most significantly, our plan sets out how we intend to refocus our resources to increase our work with communities and businesses to prevent emergencies from happening, whilst also responding more efficiently when they do, with the aim of leaving no-one behind. Our vision is to make Surrey a safer place to live, work, travel and do business.

Thank you for your feedback which has helped shape our plan. We are confident that this plan will ensure we are best placed to meet your expectations of a modern fire and rescue service.

¹ [Fire and Rescue Reform Programme](#)

² [Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services Inspection Programme and Framework](#)

³ [Fire and Rescue National Framework for England](#)

Purpose of this plan

The Fire and Rescue National Framework for England requires Fire and Rescue Authorities to produce an Integrated Risk Management Plan (IRMP). Our plan is called “Making Surrey Safer - Our plan for 2020-2023”.

The plan sets out our priorities to keep you safe in Surrey, improving how we deliver services to ensure our communities are safer, whether it be preventing and protecting people from fire and other risks, or responding swiftly and effectively to the emergencies that occur. It also is our plan for how the Surrey Fire and Rescue Service responds to the changes and challenges we face.

Over the past decade we have seen a significant decrease - almost half - in the number of fires attended across the UK. This suggests that, as a society, we are becoming safer than ever from the risks and consequences of fire.

This decrease can be attributed to many factors, including in part the prevention and protection work that Fire and Rescue Services deliver day in, day out, up and down the country. We know in Surrey we need to do more of these types of activities, not only to continue the downward trend in fires but also to address the increase in fatalities in the water and as a result of road accidents. We must do more to keep people, especially the most vulnerable in our communities, as safe from fire and other risks as possible. In many cases, this means engaging effectively with other agencies to work together to better protect and improve the outcomes for these individuals.

Making Surrey Safer - Our plan for 2020-2023, amongst other things, sets out how we will respond to:

- Surrey County Council’s Community Vision for Surrey in 2030⁴. Surrey County Council is our Fire and Rescue Authority, and the Vision emphasises the need for prevention activities to improve outcomes for residents.
- Our recent HMICFRS inspection⁵, highlighted areas we need to continue working on to make us more effective and efficient in the ways we keep people safe from fires and other risks, particularly how we use our resources to do so

This plan sets out how we will:

- Do more to prevent emergencies from happening in Surrey
- Make sure we have the right resources in the right places at the right time to respond when you need us
- Continuously look at ways that we can improve what we do so we are as effective and as efficient as we can be
- Continue to strengthen our approach to collaboration with our partners
- Invest in our people to make sure they have the best training and development and are as motivated as possible
- Create a culture that is collaborative, inclusive and diverse so that we maximise our understanding of our communities’ needs

⁴ [Surrey County Council’s Community Vision](#)

⁵ [HMICFRS – An inspection of Surrey Fire and Rescue Service](#)

New ways of working

This document outlines how our Fire and Rescue Service is going to operate. By working differently we can be more efficient and effective.

Our new ways of working means:

More prevention work to keep communities safe

When our firefighters and fire engines aren't needed at 999 calls, we will be undertaking preventative activities i.e. teaching you how to be safe around water, preventing fires from occurring and working with businesses to understand their legal responsibilities as a business owner. Much of this is done during the day when people are at school, work, home and most active in the community. Some of this will also be done by our teams at night.

More resilience and firefighter training

We need 20 fire engines during the day and 16 at night to keep Surrey safe. We will have more fire engines than we need - five more during the day and seven more at night-time, this additional capacity allows extra resilience for larger and longer emergencies as well as training and practice in the increasing variety of emergencies we now respond to.

More on-call firefighters

To be an on-call firefighter you need to live or work within four minutes of our on-call fire stations so you can get there quickly. This means it's often difficult to recruit on-call firefighters, especially in Dunsfold and Gomshall. We are expanding the catchment area for firefighters at some of our on-call areas, including Dunsfold and Gomshall, so that we will attract more people to our service. Any increased time taken to reach the fire station by on-call firefighters will be factored into our operations and will not affect our response standard.

More investment in business and community safety

We want to be able to invest more money in prevention and protection activities via our business and community safety services. The more prevention and protection work we do, the less we will need to respond. By ensuring we have the right allocation of resources to meet the needs of Surrey, we can reinvest in prevention and protection activities.

Charging for non-statutory services

We are also looking at charging for some incidents we attend such as false reports of fire (hoax calls and automatic fire alarms that aren't real) and animal rescues, to re-invest into our service. Wherever possible, we will work with partners, business and animal owners, for example the National Farmers' Union, to avoid the need to respond to these types of incidents at all, handing them over to the responsible person(s); this will avoid the need for a charge to be made.

Our finances

The total budget for the Fire and Rescue Service for 2019/2020 is £34.9m. The majority of this is spent on staffing.

Our commitments

To spend more time on business and community safety to help prevent emergencies occurring in the first place.

Why we are doing it

To educate people and businesses about the risks of fire and other emergencies and how to prevent them.

What this means

- We will prevent more emergencies occurring in the first place.
- We will make every contact with you count
- We will do more Safe and Well visits for vulnerable people.
- We will deliver fire safety messages from school age to adulthood.
- We will work more closely with businesses, district and borough councils and partners to improve business safety.

To maintain the number of fire stations in Surrey and change how some of them are crewed.

Why we are doing it

- To manage our resources more efficiently and effectively, focusing resources to protect those at higher risk.
- We aim to provide a service offer that is broader than solely 'time to respond' and recognise that the urban and rural response is different.
- We will establish new measures based upon business and community safety activity (a core element of our future offer) as well as response.

What this means

We are changing the way we work in the Banstead, Camberley, Egham, Fordbridge, Guildford, Haslemere, Painshill, Walton, Woking, Dunsfold and Gomshall areas.

To recover costs from some incident attendances.

Why we are doing it

- We are sometimes called to incidents that are not emergencies, such as freeing trapped animals and persistent false automatic fire alarms.
- The introduction of the Localism Act 2011 increased the scope for recovering costs for emergencies we respond to that turn out to be non-emergencies.

What this means

We are exploring charging for some services such as persistent false alarms and animal rescues and re-invest this in SFRS. We will balance our statutory obligations to ensure we act ethically, humanitarily and maintain our values and standards.

Understanding community risks

The recently developed 'National Fire Chiefs Council Person Centred Approach' is a step forward in recognising how risk changes for individuals and families throughout their life and standardising the Fire and Rescue Service offer across England and devolved administrations. We want to take this further and recognise that the places where people live, work, travel and enjoy recreation also have a part to play. We will develop a wide-reaching approach to managing risk, not just in the home and workplace, but in every place where we can influence behaviour and encourage a safer attitude and environment.



Understanding our risk

We use our Community Risk Profile⁶ (CRP) to assess all foreseeable fire and rescue related risks that could affect our communities in Surrey. This includes our biggest risks for the types of emergencies we respond to and other factors, including understanding where the most vulnerable people are. We use this information, alongside national and local statistics, to decide how best to allocate our resources to prevent these risks from happening, and plan how to best respond to them if they do. This also enables us to focus our prevention activities to the areas where they are most needed and have most impact.

Some risks require us to work with partners including other emergency services, health providers, local authorities and other partner agencies. These come together through the Surrey Local Resilience Forum (SLRF) which prepares and plans for a range of emergencies across Surrey. We also use the Community Risk Register⁷ which highlights potential risks facing Surrey.

Risks associated with people

A number of factors might make someone more or less vulnerable to emergencies, particularly fire. We need to ensure that the people within Surrey are safe, we identify those that are most at risk and where we can, undertake prevention and protection activities to reduce the risk.

The most vulnerable and at greatest risk of fire tend to have at least one of the following characteristics:

- aged over 60
- living alone
- mobility issues
- hearing loss
- mental health issues
- disability
- drug or alcohol dependency
- a smoker

There is a clear link between age and vulnerability, with many of the vulnerabilities listed being more likely to occur with age. Additionally, Surrey has an aging population with over 82,000 residents being over 65 and living alone, a figure expected to rise by 34% by 2030. The number of people with alcohol and drug dependencies is also forecast to rise by 4% by 2030.

As more people are supported to live in their own home for longer, the risks increase for those who are vulnerable. For example, people with mobility issues may find it harder to self-rescue and may suffer from slips and falls. Our work needs to better focus on the most vulnerable in our county, through both prevention and protection activities to reduce the risks to them, as well as help them understand what to do in an emergency.

⁶ [Surrey Fire and Rescue Service – Community Risk Management](#)

⁷ [Surrey Community Risk Register](#)

Risks associated with places

We respond to a diverse range of risks in Surrey. They range from road traffic collisions to local fires to major disasters. As a Fire and Rescue Service we continue to work across the wide and diverse range of places we have in Surrey. Understanding the risks and learning from others to ensure we continue to minimise and prevent risks occurring in the first instance is a priority, while always being ready to respond if the risks do occur.

Surrey has a diverse range of buildings, each potentially have different risks. We have homes that are at risk of flooding and we also have a number of green spaces that may be at risk from wildfire. We have many listed buildings and heritage sites in the county, as well as a range of industrial and commercial buildings. We have manufacturing plants, fuel farms, laboratories and research sites.

The transport networks in Surrey are constantly developing. The county has around 3,452 miles of road which carry almost double the national average amount of traffic. We have a number of small airfields within our borders, and Heathrow, Gatwick and Farnborough airports are close by.



Community Safety

We will make every contact with you count

Our Community and Business Safety strategy⁸ sets out how we try and prevent emergencies from happening. We use our Community Risk Profile to target our prevention and protection activities where it will make the biggest difference. We aim to educate people about fire and other risks and how to prevent them. We also work with businesses to ensure that the buildings they use reach the required fire safety standards.

Preventing emergencies – community safety

We can do more to prevent emergencies from happening and reduce our community risks via the most appropriate use of resources.

Our community safety activity focuses on a number of areas:

- On our roads within Surrey - we engage with road users to highlight the risks of dangerous or careless driving
- Better integration of our fire stations and other premises into local communities for community use where appropriate
- Creating a 'centrally led, locally delivered' approach, that better aligns our teams with areas of risk within Surrey and develops consistency across the county in how we deliver our services to ensure we keep our residents as safe as possible
- Improving the way we collect and share intelligence so we can better identify the people in our communities who are the most vulnerable and provide the right support to keep them safe
- Broadening the kind of emergencies we aim to prevent so it is more than just fires and road traffic collisions, to include water and wildfire safety work
- Do even more Safe and Well visits for vulnerable people and expand the content to make every contact count and keep people as safe as possible in their homes
- Introduce a 'lifelong learning' concept to deliver key safety advice and information throughout resident's lives via schools, colleges and universities as well as adult learning centres and other organisations where groups of individuals meet up (particularly our known vulnerable groups)
- Expand our Surrey Fire Volunteer Service
- Work with partner agencies to drive down serious organised crime, hate crime and other partner priorities, where it aligns to our activity and the risks we intend to reduce
- Work with partner agencies which includes tackling social issues together in partnership and we have a responsibility to raise a concern when we see one. We know that people with drug or alcohol dependency problems are at greater risk of having a fire. We support our partners with their work on preventing problematic drug and alcohol use

⁸ [Surrey Fire and Rescue Community and Business Safety Strategy](#)

Protecting people and property - business safety

Our business safety activity focuses on supporting business and business owners within our community. We work with businesses to ensure that they have effective fire safety management to protect people and property. Our business safety activity also protects the safety of our firefighters, should they need to respond to a fire in that building, by understanding the risks of specific buildings before an emergency happens.

There are approximately 85,000 business premises in Surrey covered by the Regulatory Reform (Fire Safety) Order 2005 (RRO). This is the main piece of legislation that we have a duty to enforce. The RRO puts the emphasis on the responsible person to comply with the law. We operate a 'risk-based' inspection programme based on protecting the most vulnerable and those that are at higher risk.

Our business safety team delivers advice in the workplace and targets the heart of the business community to support fire safety, arson prevention, false alarm reduction and the benefits of sprinklers. We also engage with businesses throughout the county through our Primary Authority Scheme (PAS). This is a statutory scheme available to businesses with a presence in more than one local authority area.

We know that effective fire safety management makes buildings and people safer. We will do even more of this work to make businesses in Surrey safer including the following:

- Do more to target high-risk business premises to ensure they are complying with the RRO and enforce compliance where necessary
- Work more closely with district and borough councils to provide robust building consultation responses (planning regulations)
- Introduce Local Competency Authorities to support the life of buildings through fire safety provisions
- Increase our education work to improve businesses understanding of their legal requirements in relation to fire safety management and how to apply this in practice
- Work more closely with partners to develop more resilient communities, helping to prevent emergencies from happening and helping residents and communities to know how to respond if they do happen

Responding to emergencies

When we receive a 999 call, our Control Centre operators send fire and rescue personnel, vehicles and equipment to deal with the emergency. The range of emergencies we attend is vast and is constantly changing. Examples include road traffic collisions, fires in homes and business premises, water rescues and wildfires. We also attend emergencies that turn out not to be emergencies, such as responding to false reports of fire and helping to free trapped animals. These are instances that we will continue to explore the option of not needing to attend or charge for if we do.

We operate from 25 fire stations, which include a range of staff shift systems, and the crewing of 'special' vehicles capable of activities a fire engine alone cannot achieve, for example water rescues.

We do not send a fire engine based upon the closest fire station to you. We want to get to you as quickly as possible so we send the closest and most appropriate resource to the situation, regardless of where they are based. This helps us get the right equipment to you as soon as we can.

We also have arrangements in place with neighbouring Fire and Rescue Services, other emergency services and partners, including voluntary groups, to manage significant emergencies as part of a multi-agency response, for example widespread flooding.

We have introduced improvements that have reduced the time it takes between a call coming in and our firefighters leaving the station. This is helping us to get resources to the scene of an emergency more quickly. Further improving our measurement of this will tell us how successful we are being.

We will modernise the way we measure our response service. Currently it is outdated and does not necessarily take account of a range and changing types of emergencies, the development of our rural and urban areas and the changes in infrastructure. We aim to modernise this by utilising data and technology to assist us.

Our Mobilising and Response strategy⁹ sets out how we respond to emergencies.



Proposed crew and vehicle placement

Crewing and vehicle placement across the county will change in order to ensure the right resources are in the right place when we need to respond to emergencies.

This will allow us to re-focus some resources to life saving business and community safety activity instead.

⁹ [Surrey Fire and Rescue Service Mobilising and Response Strategy](#)

How we developed our new ways of working

We undertook a detailed risk analysis, using a range of information for fire and rescue cover in Surrey. This included data about previous 999 calls, predictive (demographic) data which showed us where those at highest risk are in Surrey and sites that are most at risk. We also considered local and national statistics about fires and other emergencies. Our response modelling has been externally verified. From this risk analysis, we concluded that we had more resources at night than we need.

We used this information to inform us of the best way to manage risks by allocating our resources to prevent emergencies from happening and also making sure we can respond to them when they do. This information informed our data modelling work, which took account of

- the last five years emergency response data
- call-outs per station
- critical emergencies hotspots
- current and future provision requirements
- the baseline number of fire engines that are required to provide a full response and meet safety requirements.

The modelling work carried out showed that in order to deliver an emergency response under normal circumstances, the service is required to provide the minimum number of appliances shown in the table below.

Number of fire engines available (excl special appliances)

	Minimum requirement	New model including resilience
Day time	20	22 (plus 3 on call) Total = 25
Day time - weekends	20	22 (plus 8 on call) Total = 30
Night time	16	13 (plus 10 on call) Total = 23

However, there will be times when we require more resilience to cover larger or longer emergencies and community protection and prevention activities, as well as release fire fighters for a wider variety of training activity than they undertake now. This is required because we now have less fires than we used to, and go to a wider range of emergencies, meaning our staff have less experience of more things. Therefore we must increase our training to ensure staff are well prepared and confident to deal with the fuller range of emergencies effectively and efficiently. Our new way of working reflects this.

The national Health and Safety Executive are clear it is the responsibility of fire and rescue services to adequately prepare personnel to operate in high pressure, dynamical changing and dangerous situations.

This new way of working will ensure we have enough flexibility within our workforce to deliver an **efficient emergency response** alongside **increasing our effectiveness in business and community safety** within our communities.

Measuring our performance

We will use data and analytics to continuously look at ways that we can improve so we are as effective and as efficient as we can be. We have a refreshed and robust performance framework which supports our aspiration for continuous improvement. It monitors performance on an individual, team and a service basis. This is reviewed and scrutinised to make sure we are delivering our outcomes. We publish an annual external highlight report which provides an overview of our performance.



Glossary

Fire engine

The general term used to describe all firefighting and incident management vehicles, including the standard fire engine. Also called frontline appliance or pumping appliance.

Special appliances

Vehicles which have specialist capabilities to assist in dealing with emergencies, eg water rescue.

Wholetime

Full-time firefighters.

Day crewed

The station will have crewed appliances available during the day.

On-call duty system

Firefighters are recruited to be available on-call close to their local fire station for a certain number of hours, plus regular training. They are paid a retainer plus a call-out fee for incidents attended.

Surrey Fire volunteers

To assist the operational firefighters, Surrey Fire and Rescue has developed a network of volunteers to help stations and departments to engage more effectively with local communities and deliver community safety activity.

Community safety

The range of fire prevention activities undertaken by the fire service in residents homes and to raise awareness of other community risks, for example water, often in conjunction with partner agencies.

Safe and Well visits

Working with partners to help keep the most vulnerable residents in communities safe in their home. They are visits by firefighters or other trained fire service staff, to provide information on fire safety in the home, falls prevention, alcohol use, staying warm and well, and crime reduction. Visits are free to residents.

Business safety

The range of fire protection activities undertaken by the fire service within businesses, often in conjunction with partner agencies.

Fire safety audits

These examine premises and relevant documents to ascertain how the premises is being managed in relation to H&S/fire avoidance and if the Fire Safety Order is being complied with.

Further reading

1. <https://www.local.gov.uk/sites/default/files/documents/HO%20fire%20reform%20programme%20-Nick%20Chard.pdf>
2. <https://www.justiceinspectors.gov.uk/hmicfrs/fire-and-rescue-services>
3. <https://www.gov.uk/government/publications/fire-and-rescue-national-framework-for-england--2>
4. <https://www.surreycc.gov.uk/council-and-democracy/finance-and-performance/our-performance/our-corporate-strategy/community-vision-for-surrey-in-2030>
5. <https://www.justiceinspectors.gov.uk/hmicfrs/fire-and-rescue-services>
6. <https://www.surreycc.gov.uk/people-and-community/fire-and-rescue/about/our-vision-mission-and-aims/priorities-plans-and-governance/how-surrey-fire-and-rescue-manage-risk-and-business-continuity>
7. https://www.surreycc.gov.uk/data/assets/pdf_file/0008/71729/Surrey-LRF-Community-Risk-Register-2018-2019-ZM.pdf
8. https://www.surreycc.gov.uk/data/assets/pdf_file/0008/182951/Community-and-Business-Strategy-2018-to-2020.pdf
9. https://www.surreycc.gov.uk/data/assets/pdf_file/0007/182950/Mobilising-and-Response-Strategy-2018-to-2020.pdf

Fire & Rescue Service

Effectiveness, efficiency and people 2018/19

An inspection of Surrey Fire and Rescue Service



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About this inspection

This is the first time that HMICFRS has inspected fire and rescue services across England. Our focus is on the service they provide to the public, and the way they use the resources available. The inspection assesses how effectively and efficiently Surrey Fire and Rescue Service prevents, protects the public against and responds to fires and other emergencies. We also assess how well it looks after the people who work for the service.

In carrying out our inspections of all 45 fire and rescue services in England, we answer three main questions:

1. How effective is the fire and rescue service at keeping people safe and secure from fire and other risks?
2. How efficient is the fire and rescue service at keeping people safe and secure from fire and other risks?
3. How well does the fire and rescue service look after its people?

This report sets out our inspection findings. After taking all the evidence into account, we apply a graded judgment for each of the three questions.

What inspection judgments mean

Our categories of graded judgment are:

- outstanding;
- good;
- requires improvement; and
- inadequate.

Good is our 'expected' graded judgment for all fire and rescue services. It is based on policy, practice or performance that meet pre-defined grading criteria, which are informed by any relevant [national operational guidance](#) or standards.

If the service exceeds what we expect for good, we will judge it as **outstanding**.

If we find shortcomings in the service, we will judge it as **requires improvement**.

If we find serious critical failings of policy, practice or performance of the fire and rescue service, we will judge it as **inadequate**.

Service in numbers



Public perceptions

Surrey

England

Perceived effectiveness of service
Public perceptions survey (June/July 2018)

84%

86%



Response

Surrey

England

Incidents attended per 1,000 population
12 months to 31 March 2018

10.0

10.2

Home fire risk checks carried out by FRS per 1,000 population
12 months to 31 March 2018

3.0

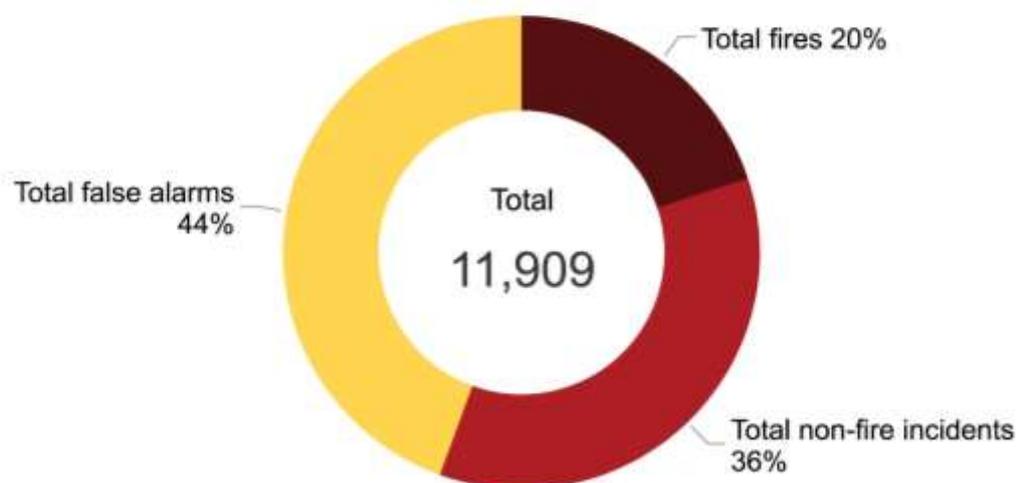
10.4

Fire safety audits per 100 known premises
12 months to 31 March 2018

5.2

3.0

Incidents attended in the 12 months to 31 March 2018





Cost

Surrey

England

Firefighter cost per person per year
12 months to 31 March 2018

£22.73

£22.38



Workforce

Surrey

England

Number of firefighters per 1,000 population
As at 31 March 2018

0.5

0.6

Five-year change in workforce
As at 31 March 2013 compared with 31 March 2018

-20%

-14%

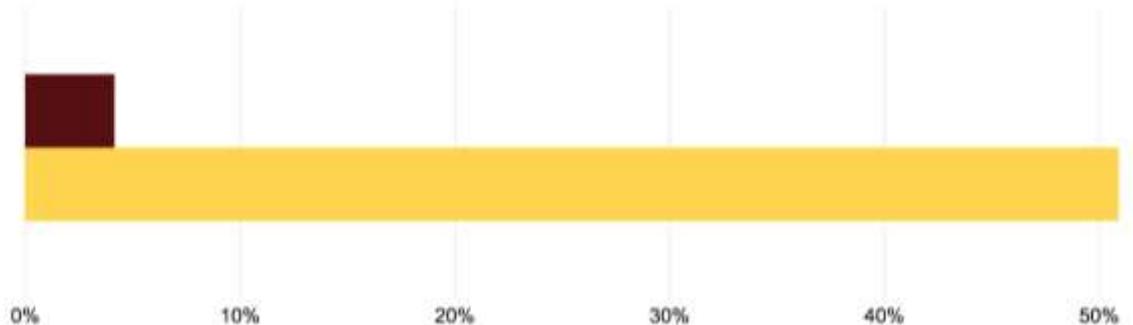
Percentage of wholetime firefighters
As at 31 March 2018

84%

70%

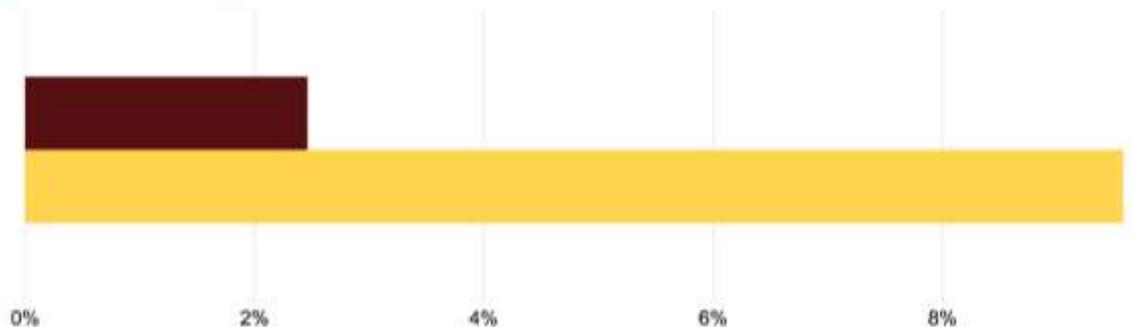
Percentage of female firefighters as at 31 March 2018

● Female firefighters ● Female residential population



Percentage of black, Asian and minority ethnic firefighters as at 31 March 2018

● BAME firefighters ● BAME residential population



Please refer to annex A for full details on data used.

Overview

 Effectiveness	 Requires improvement
Understanding the risk of fire and other emergencies	 Good
Preventing fires and other risks	 Requires improvement
Protecting the public through fire regulation	 Requires improvement
Responding to fires and other emergencies	 Requires improvement
Responding to national risks	 Good
 Efficiency	 Inadequate
Making best use of resources	 Inadequate
Making the fire and rescue service affordable now and in the future	 Requires improvement



People



Requires improvement

Promoting the right values and culture



Requires improvement

Getting the right people with the right skills



Requires improvement

Ensuring fairness and promoting diversity



Requires improvement

Managing performance and developing leaders



Requires improvement

Overall summary of inspection findings

We have concerns about the performance of Surrey Fire and Rescue Service in keeping people safe and secure. In particular, we have serious concerns about the service's effectiveness and efficiency. In view of these findings, we have been in regular contact with the chief fire officer, as we do not underestimate how much improvement is needed.

The service should keep people safe from fire and other emergencies more effectively. It must improve how it responds to and prevents fires and other risks, and how it uses fire regulation to protect the public. Positively, it understands these risks well. It is also good at responding to national risks.

The service is inefficient at keeping people safe from fires and other risks. This is particularly so in how it uses its resources. But the service should also be more affordable.

The service needs to improve how it looks after its people. More specifically, it should do better at:

- promoting the right values and culture;
- getting the right people with the right skills;
- ensuring fairness and promoting diversity; and
- managing performance and developing leaders.

Overall, there are improvements we expect the service to make. We will be monitoring progress.

Effectiveness



How effective is the service at keeping people safe and secure?



Requires improvement

Summary

An effective fire and rescue service will identify and assess the full range of foreseeable fire and rescue risks its community faces. It will target its fire prevention and protection activities to those who are at greatest risk from fire. It will make sure businesses comply with fire safety legislation. When the public calls for help, the fire and rescue service should respond promptly with the right skills and equipment to deal with the incident effectively. Surrey Fire and Rescue Service's overall effectiveness requires improvement.

The service understands the risk of fire and other emergencies. It uses the adult social care database to inform this understanding. The service has an effective, continuous, ten-year [integrated risk management plan](#) (IRMP). It collects and uses risk information in a good way, generally. But it could do better at prioritising the collection of site-specific risk information. Crews working across borders lack awareness of the risk information that they need.

The service requires improvement in the way it prevents fires and other risks. It shares data with other organisations to identify people particularly at risk. It visits anyone who requests a [home fire safety check](#), without prioritising them according to risk. The service runs good prevention programmes, but does not evaluate them all. It promotes community safety, collaborating with others. It draws on the Surrey Fire Volunteer Service for prevention activities.

The service must improve the way it protects the public through fire regulation. Its audit and inspection rates are in line with the average for England. But it is not clear whether the service can inspect all the high-risk properties it identifies. The service works with other organisations. But we did not see much work with local businesses to reduce unwanted fire signals. The service does not engage with businesses to any great degree to educate them about complying with fire regulations.

The service requires improvement in the way it responds to fires and other emergencies. It has reduced its workforce over time but has not adjusted its way of working accordingly. We are concerned that it does not have a plan to ensure it can go on providing services in the way it does now. The service acknowledges that it relies too much on overtime working. Commanders have mixed levels of understanding of national guidance for decision making. The service holds debriefs after incidents and is working to improve the way it collects and shares learning from these.

The service is good at responding to national risks. It holds national assets for dealing with a variety of incidents. Control room staff know how to access these, but frontline staff are less confident in using them. The service has officers trained to command during an attack by marauding armed terrorists, but it has not tested these plans with frontline and control room staff.

Understanding the risk of fire and other emergencies



Good

Surrey Fire and Rescue Service is good at understanding the risk of fire and other emergencies. But we found the following area in which it needs to improve:

Areas for improvement

- The service should ensure its firefighters have good access to relevant and up-to-date risk information. This should include site-specific and cross-border risk information.

All fire and rescue services should identify and assess all foreseeable fire and rescue-related risks. They should also prevent and mitigate these risks.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Understanding local and community risk

The service interacts with the public in a positive way. It produces station plans that clearly detail its priority activities over the coming year. These plans show a good understanding of local communities and of the risks they face. But it is not clear how much the service engages with the public to produce these station plans.

The service publishes information on its website, such as its response standards. This allows the public to see how it is performing. The service has well-established working arrangements with organisations such as housing associations and Age UK Surrey. It uses social media to tell the public about incidents. The service could improve the information available to the public on its website by updating the content.

The service has a good understanding of its local community and of the needs of the people it serves and the risks they face. We found that the service uses a wide range of data to produce an accurate risk profile. This comes from a range of sources and includes general demographic data and data from other agencies like the NHS. Importantly, the service has direct access to the adult social care database. It uses this database to find and support those people most in need.

The service takes part in several community boards and plays an integral part in the [local resilience forum](#). There are clear links to the community risk register in the service's IRMP. The service is a lead agency for specific community risks, such as flooding and large chemical incidents. The service benefits from these partnerships and uses information from partner bodies to target its activity towards public need. Dedicated teams provide a range of educational and prevention work in targeted areas, such as youth engagement and road safety.

Having an effective risk management plan

Each [fire and rescue authority](#) must produce an IRMP. The service should consult the public when it writes this plan. The IRMP should provide an up-to-date picture of the risks within the county. It should say how the service will manage these through its prevention, protection and response activities. The plan should cover at least a three-year time span.

The service has a ten-year IRMP. The service refreshed its IRMP in 2016 and republished it. It used risk modelling, historical data and the council's future planning assumptions, including housing and population predications. The service consulted the public through online surveys and face-to-face reference groups.

The IRMP describes the risks and difficulties that the service and the people of Surrey face. The plan links risk to the public with the service's operational activity. This includes response times, education campaigns and its approach to protection and regulation.

The service does some good work with other agencies to reduce the risk of fires and other emergencies among those most in need. The IRMP does not explain how the service will work with neighbouring fire and rescue services to reduce risk and improve outcomes.

Maintaining risk information

The service has a programme to gather risk information. It uses specialist teams and wholetime crews to visit and update site-specific risk information. The service visits new premises and carries out risk assessments to determine whether the premises pose a risk to the safety of firefighters or to the public.

Operational crews can access site-specific risk information and other risk data. The information is available on [mobile data terminals](#) in every fire engine. It includes information about accidents involving chemicals, and data on vehicle safety systems when responding to road traffic collisions.

The service updates risk information to ensure crews are aware of changes to risks. Such changes might include sprinklers not working in a building, or the presence of a [vulnerable person](#). Operators in the control room give this information to crews through the mobile data terminals.

The service's use of risk information generally is good. And staff have good access to it. But the service could improve the way it updates and prioritises site-specific risk collection work. We found examples of out-of-date risk information. There were also no set time frames for the service to update risk data submitted for change. The service told us that risk information is available to crews working ten miles over the border. However, we found that crews were not always aware of this information. This could increase the risk to them when they attend fires outside their own service area.

Preventing fires and other risks



Requires improvement

Areas for improvement

- The service should ensure it targets its prevention work at people most at risk.
- The service should evaluate its prevention work, so it understands the benefits better.
- The service should ensure staff understand how to identify vulnerability and safeguard vulnerable people.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Prevention strategy

The service prioritises prevention activity and aligns its plan for prevention work to risk. This is in line with statutory guidelines.

We found the service shares data with other organisations, such as adult social care and the health service. This helps it to identify those people within the community who are at risk from fires and other emergencies. But the service could do more to prioritise the most vulnerable people. This would allow it to manage better the increasing demand on its resources. For example, anyone who requests a home fire safety check from the service will receive one, regardless of how vulnerable they may or may not be.

In the 12 months to 31 March 2018, the service carried out 3,521 home fire safety checks. This represents 3.0 visits per 1,000 population and compares with the England rate of 10.4 per 1,000 population. The service should ensure it works more effectively to meet the needs of the most vulnerable in its communities.

The service runs education campaigns to improve the safety and wellbeing of its residents. These range from well-established programmes run by specialist teams to local events run by operational crews.

We found some good prevention activities developed by the service and other agencies. One example is the One Stop Surrey scheme. The service showed how it has evaluated the effectiveness of some campaigns, such as the Safe Drive, Stay Alive programme. But it was a limited evaluation. A consistent level of evaluation could help the service to better inform its approach and target its resources more effectively.

Promoting community safety

The service works closely with other organisations to promote community safety. For example, at Camberley fire station, the service has an agreement with a housing agency to refer new residents for home fire safety checks.

Health Hubs provide integrated health and social care teams in the community. The service works with these teams to share information to support vulnerable people. It works with youth justice and educational welfare services to identify those at risk of anti-social behaviour or fire-setting. In this collaboration, the service leads on youth engagement to combat anti-social behaviour among young people. It offers vulnerable children education and positive options through the Firewise scheme.

Staff receive training to help them identify vulnerable people. In their fire engines, they can access guidance on what makes someone vulnerable. They can also speak to on-call safeguarding officers. But we found the approach to [safeguarding](#) between specialist and operational crews inconsistent. Specialist teams felt more confident than operational crews at recognising vulnerable people and accessing safeguarding services. The service should assure itself that all staff have appropriate and up-to-date safeguarding skills.

Service leaders play an active part in road safety partnerships and the serious and organised crime partnership board. The service's team of fire investigators supports the police in reducing arson and the impact of fire-setting.

The service uses the Surrey Fire Volunteer Service in its prevention activities. The volunteers help the service with education programmes. They also make home fire safety checks and install sensory alarms in people's homes. The service's use of this group to support the service's objectives and keep the community safe is a good way of working.

Road safety

The service's main road safety education programme is Safe Drive, Stay Alive. This multi-agency, interactive experience has communicated its message to thousands of young people aged over 13, according to data provided by the service. The service has a dedicated team that raises funds and co-ordinates this activity. [Wholetime staff](#) and volunteers also provide support. The University of Surrey and Road Safety Analysis have independently reviewed this activity. The review shows a positive change to the sort of risk behaviour that may have led to accidents on the roads. Locally, operational firefighters promote road safety in line with their station plans. They promote road safety at station open days and through road-user awareness days.

Protecting the public through fire regulation



Requires improvement

Areas for improvement

- The service should ensure it allocates enough resources to a prioritised and risk-based inspection programme.
- The service should ensure it addresses effectively the burden of false alarms (termed 'unwanted fire signals').
- The service should ensure its staff work with local businesses and large organisations to share information and expectations on compliance with fire safety regulations.

All fire and rescue services should assess fire risks in buildings and, where necessary, require building owners to comply with fire safety legislation. Each service decides how many assessments it does each year. But it must have a locally determined, risk-based inspection programme for enforcing the legislation.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Risk-based approach

The service has a risk-based programme of audits and inspections. It uses a range of data to inform this programme. But the allocated resources do not meet the demands of its risk-based inspection programme. The central protection team manages the programme. Its members are trained to a higher level, and can do more complex risk protection work. The whole-time workforce conducts low and medium-risk thematic audits. The proportion of protection audits on known premises (except for private single dwellings) has increased from 1.1 percent in the 12 months to 31 March 2014 – which was below the England rate – to 5.2 percent in the 12 months to 31 March 2018 – which is above the current England rate of 3.0 percent. This equates to audits on 1,525 of the 29,076 known premises.

The service needs to consider how it is resourcing and prioritising its risk-based inspection programme. The resourcing levels may also limit the resilience of the team to respond to future changes in demand. As at 31 March 2018, the service identified 2,216 high-risk premises. In the 12 months to 31 March 2018, 313 protection audits were conducted on high-risk premises, representing a high-risk audit rate of 14 percent. It was unclear how the service will be able to inspect the 2,216 high-risk premises that it has identified.

Enforcement

The service audits businesses to improve fire safety in premises that do not comply with legislation. In the 12 months to 31 March 2018, the number of protection inspections that the service completed, where the outcome was unsatisfactory, was 24 percent. We saw examples of the service taking joint action to increase fire safety with enforcement agencies, such as housing and environmental health. In these cases, one agency takes the lead and the others provide support. This shows a collaborative approach and makes the best use of time and resources. The service has access to independent legal advice. It prosecutes those that fail to comply with their legal duties under the fire safety order. The service has successfully secured several prosecutions over the past two years.

Working with others

We saw limited evidence of effective work with local businesses to reduce the burden of unwanted fire signals. In the 12 months to 31 March 2018, Surrey FRS attended 5,292 false alarm incidents. Of these, 72 percent were due to the apparatus, rather than good intent calls or malicious calls. This is a relatively high proportion of false alarm incidents compared to other services, and an increase compared to the 12 months to 31 March 2011, when 67 percent of 4,994 false alarm incidents attended were due to the apparatus. The service has announced that it will reduce the number of times it goes out for unwanted fire signals. But its approach is not co-ordinated and it has not engaged well enough with businesses. Doing so could help the service target those premises with the highest numbers of unwanted fire signals.

The service could do more to improve compliance with fire safety legislation through education. We found examples of good work with businesses when crews found problems. But there was little evidence of the service taking a proactive approach to educate businesses. Education may help businesses to understand and comply with fire regulation. This would reduce the burden on the service and on local businesses.

Responding to fires and other emergencies



Requires improvement

Cause of concern

Surrey FRS doesn't have a robust and sustainable system to support its operational response model.

Recommendations:

By 30 June 2019, the service should:

- put in place a response plan based on a thorough assessment of risk to the community;
- ensure it has appropriate resources (people and equipment) available to respond to risk in line with its integrated risk management plan;
- ensure it understands and actively manages the resources and capabilities available for deployment; and
- tell the people of Surrey what benefits its service provision and ways of working in the operational response model will give them.

Areas for improvement

- The service should ensure it has an effective system for staff to use learning and debriefs to improve operational response and incident command.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Managing assets and resources

Since 2011, the service has reduced its wholetime workforce. But it could not show us how it has adjusted its operational model to work with fewer staff. The service pays some wholetime staff overtime to bolster the numbers of available crews. But sometimes it does not have enough fire crews to keep all the fire engines available to respond to the public (including specialist assets) in accordance with its normal expectations. So, station crews will be temporarily relocated to areas of greater need.

The service describes its over-reliance on overtime as its highest risk. But we could not see how it manages the daily operational consequences of this. [Watch](#) managers leading firefighters working overtime do not have enough management information. This means they cannot always assure themselves that crews are fit to work. We told the service that we are concerned about the potential risk to firefighter and public safety. Since our inspection, we have revisited the service to check on its progress in addressing this risk.

The service uses a system called a dynamic cover tool to support its operational resource management. This real-time mapping system uses historical data to predict current risk levels within the county. The service also has a policy for what is known as degradation. This considers the impact of reduced staffing levels and resulting reduction in appliances. The policy manages the order in which stations and appliances are removed from operational use. These tools help to relieve some of the effects of the over-reliance on overtime. The policy aims to ensure that the service can provide a prioritised response to the public when needed.

Response

In the IRMP, the service told the public it will have a certain number of fire engines available. It rarely achieves this figure, but still manages to respond to all calls for service. The service supplied data to us that shows this is worse during the day, when demand is at its highest. This is an ineffective use of resources. The service needs to consider what level of resources is appropriate for the risks it identifies within Surrey. It needs to communicate this to the public.

The service has clear response standards within its IRMP and its performance is available on its website. The service tells the public that it will get the first fire engine to the most [critical incidents](#) within 10 minutes, and a second in 15 minutes, 80 percent of the time. The service told us it met this target 79 percent of the time in 2016/17, and 78 percent of the time in 2017/18.

During our inspection, we saw a confident approach to intelligent call handling by [fire control room](#) staff. This allows control operators to use their skills and experience to make changes to resourcing when they felt it was appropriate. Staff felt confident to make these decisions. The automated vehicle location system allows them to identify the nearest fire engine to an incident. This means they can ensure the fastest response. The control room has good systems to pass on risk information to crews. This included information about buildings, national guidance or vulnerable people in their communities.

The control room is currently operating below its expected staffing levels. This limits the resilience of the organisation and the way it can adapt and respond to changing circumstances. It means that control managers sometimes have to support operational deployments when they could be managing the control room.

Command

Staff get appropriate levels of command training. Those required to command incidents felt confident and competent in their roles. The training team trains incident commanders. The team also formally assesses how safe and effective staff are. Operational commanders showed mixed levels of understanding of national models such as [Joint Emergency Services Interoperability Principles](#) (JESIP) and national guidance for command decision-making. We found less understanding among frontline managers than senior managers. The service should assure itself that all operational commanders are aware of, and well-practised in, the use of command principles. The levels of command at operational incidents are proportionate and based on risk.

Keeping the public informed

The service communicates with the public through other organisations, such as the police. It also uses social media, which the control room updates. It uses them to raise awareness of safety messages, such as the risk of wildfires during hot weather. The service has one communications officer. It was not clear how the service would maintain meaningful communications outside normal working hours, or during times of high demand.

The service also runs a Telecare service from two of its retained stations. Telecare supports vulnerable people in their homes who require help because of mobility issues or a fall. This interaction with vulnerable people raises the service's awareness of those in need in its communities.

We found that prevention specialists recognised vulnerable people and make safeguarding referrals appropriately. Frontline staff are less confident. The service should assure itself that all staff maintain their skills in recognising vulnerable people within their communities.

Evaluating operational performance

The service has access to a range of performance data. Response times have increased in recent years. For example, these are the average response times to a [primary fire](#):

- In 2015/16: 8 minutes and 52 seconds.
- In 2016/17: 9 minutes and 9 seconds.

The service is looking at ways to improve response times. Work is at an early stage. For example, the service is exploring the use of the initial response vehicles crewed by two firefighters. These vehicles can deal with low-level incidents or provide an initial assessment at the early stages. The service believes that this will allow for a better use of resources and free up fire engines to deal with higher-risk calls. The service is trying two of these vehicles and will evaluate the results.

[Hot debriefs](#), which crews conduct immediately after an incident, are in wide use across the organisation. Staff can also communicate learning from incidents using an electronic debrief form. This provides a more structured format and covers areas such as health and safety, and command.

The service holds structured debriefs after large or significant incidents. A central team co-ordinates this work. The service needs to ensure it does not miss opportunities to learn and improve its operational practices. For example, we saw examples of unreturned and poorly completed incident documentation, including operational risk assessments. The service knows about this and aims to do better but it is too early to observe any improvement. We also found that formal debriefing lacked scrutiny and challenge. It didn't always lead to improvements.

Responding to national risks



Good

Surrey Fire and Rescue Service is good at responding to national risks. But we found the following area in which it needs to improve:

Areas for improvement

- The service should ensure it is well-prepared to form part of a multi-agency response to a community risk identified by the local resilience forum, including a marauding terrorist attack, and that its procedures for responding to terrorist-related incidents are understood by all staff and are well tested.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Preparedness

The service has dedicated [national resilience assets](#) to deal with a range of incident types. We saw that staff in the control room are clear about how to make these available. The service can draw on national and local agreements with bordering services as needed. We found operational staff were less confident with the use of their national assets. The service needs to put a robust process in place to maintain and monitor these additional skills.

The service has effective arrangements to support the control room at times of high demand. It has back-up arrangements with another fire service to take excessive calls. But this can only hold calls until local [mobilisation](#) is possible.

Working with other services

Surrey FRS has several neighbouring fire and rescue services and cross-border work is well established at incidents. We found good examples of the service working closely with East Sussex and West Sussex FRSs. But we saw less work with other neighbouring fire services (including London Fire Brigade). We also found that crews have limited risk information when working over borders. We also found limited evidence of the service sharing learning when crews work with neighbouring services.

The service needs to encourage effective working arrangements with other fire services to improve safety and the service to the public.

Working with other agencies

The service works well with its multi-agency partners. But we found better working between more senior managers than at the operational level. The service is part of the local resilience forum and has a dedicated member of staff on this team. We found a good regime of multi-agency exercising. The service participates in a programme to co-ordinate volunteers called Surrey Preparedness, which the local resilience forum started after recent flooding.

The service has no dedicated teams for incidents involving marauding terrorist firearms teams. But it does provide a command function through specially trained officers ([national inter-agency liaison officers](#)). These officers have documented procedures that are well tested. Control staff and operational staff have access to information about what to do in the event of a terrorist incident. But there was little evidence that the service tests and exercises these plans. The service should ensure that it explains to staff across the organisation what it expects of them during marauding terrorist firearms incidents. It should also test their understanding of its plans.

Efficiency



How efficient is the service at keeping people safe and secure?



Inadequate

Summary

An efficient fire and rescue service will manage its budget and spend money properly and appropriately. It will align its resources to its risk. It should try to keep costs down without compromising public safety. Future budgets should be based on robust and realistic assumptions. Surrey Fire and Rescue Service's overall efficiency is inadequate.

The service is inadequate at making the best use of resources. We are concerned that it does not use its financial and physical resources efficiently to manage risk and keep people safe. The service is working to manage its longer-term challenges but this is not resulting yet in sustainable change. It has reduced the size of its staff through people leaving and retiring but has not adjusted its ways of working accordingly. It relies on overtime working to keep fire engines available. This is not sustainable financially, and could put crew members and the public at risk. The service does not have a robust workforce plan. It relies heavily on staff working overtime. This has led to inefficient ways of working, such as managers spending too much time on planning. We saw a number of examples of the service collaborating with other organisations. But we did not see much evidence of benefits to the service.

The service must improve the way it makes its service affordable now and in future. It is making the savings required by Surrey County Council between 2010/11 and 2020/21. But it is not clear whether the service can maintain this until 2021. It uses the council's HR, IT and payroll, but does not check to see whether these provide good value. The service uses an effective tool that draws on historical risk data to map the need for cover. Frontline staff told us that the database they use for risk work is frustratingly slow and inefficient. The service needs to train staff fully in IT systems. The service is collaborating with others to save money but two such projects are delayed. A lack of investment in estate and fleet has left the service without some training facilities.

Making best use of resources



Inadequate

Cause of concern

Surrey Fire and Rescue Service doesn't use its resources efficiently to manage risk or its financial and physical resources effectively to keep people safe.

Recommendations

By 30 June 2019, the service should ensure that:

- its resourcing model meets risk demand sustainably;
- its workforce model supports its operational model to manage risk efficiently and sustainably; and
- it uses the available budget prudently to support its risk management activities.

Areas for improvement

- The service should assure itself that it makes the most of collaboration opportunities and that they improve its capacity, capability, service to the public and are value for money.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

How plans support objectives

The service lists nine proposals in its IRMP to manage its longer-term challenges and keep Surrey communities safe. It monitors these proposals regularly through the IRMP action plan. We could not find evidence that they are bringing about the sustainable changes that the service needs to make to meet its budgetary requirements.

The service must look closely at areas like workforce planning, collaboration and operational deployment.

The service decided to reduce the number of its wholetime operational staff seven years ago. It has achieved staff reductions through people leaving and retiring rather than through voluntary or compulsory redundancy. But it has not refreshed its assumptions for its operational response modelling in line with the changing profile of the workforce. The service relies on paying staff overtime to maintain appliance availability. This is an inefficient use of resources. The service needs to assure itself that it has enough staff for the level of risk its community faces in the

long term. It should not rely on short-term measures such as overtime payments. Until the service solves this for the long term, it needs more robust management to ensure crews are safe to work.

The service must consider the level of resources it needs to meet the risks in Surrey and manage its resources accordingly. The service has taken some steps towards this. For example, the service closed two fire stations and opened a new one, ensuring the same level of cover in both areas. But this project has not yet released the expected £900,000 in savings because of problems with property access.

Productivity and ways of working

As at 31 March 2018, of 558 full-time equivalent firefighter posts, 469 are wholetime firefighters and 89 are [retained duty system](#) firefighters. This is a reduction from the 641 full-time equivalent wholetime firefighters and the 103 full-time equivalent retained firefighters as at 31 March 2011.

Despite the service's decision to reduce the workforce, it does not have a robust workforce plan. The service's crewing model is based on four operational staff for each wholetime fire engine. In 2017, to increase the availability of crews, the service agreed to remove the limit on the amount of overtime that staff can work. The service now relies on firefighters working overtime to maintain its operational response. The service could not show that it had enough controls to manage the welfare of its staff working overtime. Owing to this decision, there are inefficiencies throughout the wholetime workforce. This includes managers spending excessive time planning moves and visits and the rescheduling of planned training. The service recognises this problem and is trying to increase its wholetime workforce through recruitment and transfers.

The service uses its wholetime workforce to do prevention and protection activities. We found that the service could improve the links it makes between station plans and local risks. Adopting a more tailored approach to station plans could ensure a better match between activities and risk, and improve staff productivity.

Collaboration

The service recognises its duty to collaborate and has a long history of attempted collaboration. But there is little evidence to show this has increased capacity or improved service.

Transformation funding for emergency medical response has improved the service to the public and diversified the skills of the operational workforce. But this project is on hold. The service has recently collaborated with Surrey Police on the provision of occupational health. Both organisations now hope to offer a wider range of support to staff. The service has yet to fully understand the benefits of this.

Closer work with East Sussex and West Sussex fire and rescue services is starting to show some promise. The services are aligning their in-house processes to increase collaborative opportunities. One example of this is joint recruitment, although this has not done much to increase capacity, capability or savings.

Continuity arrangements

The service's business continuity arrangements are externally audited each year. The service tests its control centre and its IT systems. Both have features to limit the risk in the event of a catastrophic failure. These include security accreditation of IT systems and [fall-back](#) arrangements for fire control.

Making the fire and rescue service affordable now and in the future



Requires improvement

Areas for improvement

- The service needs to ensure how it uses technology to improve its efficiency and effectiveness. It should ensure that efficient processes and appropriate training are in place for staff who use IT systems in their work.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Improving value for money

The service told us that between 2010/11 and 2020/21, Surrey County Council required it to save £10.7m. The service has managed its savings to date through a programme of workforce reduction and restructure, income generation and station relocation. It has set out the savings plans in its IRMP and in its medium-term financial plan (MTFP). However, the service does not have future savings plans that meet the demands of the MTFP.

The main savings to date have come from reductions in wholetime firefighters (full-time equivalent) of approximately a quarter (641 as at 31 March 2011 to 469 as at 31 March 2018) since 2011. The fire cover reconfiguration project, which involved the closure of two fire stations and the opening of a newly located station, has experienced delays. The project has not realised its predicted savings in time.

The service has ways to generate income through a trading arm of the county council. Data provided by the service stated the income generated in 2017/18 was £531,000. It comes from areas such as contingency and training provision. The council supports the service's savings plan.

The service does not have its own [reserves](#). Financial contingency is provided from a reserve held by the Surrey County Council. Surrey County Council provides support functions, including HR, IT and payroll. The service showed us the costs of these functions. But the service does not scrutinise or review these costs to ensure that they provide good value for money.

Innovation

The service is innovative in how it manages its resources as incidents happen. An example of this is its dynamic cover tool. This database has five years of historical data. It feeds a live mapping system that shows where fire engines are, and where it predicts risk. Fire control uses this tool to manage resources according to risk in real time. The service knows it could do more with this to develop the concept of borderless mobilising. This could increase efficiencies with its neighbouring fire and rescue services.

The service also uses a range of IT-based systems to support operational activity, but they aren't always efficient. An example is the database that the service uses for its prevention, protection and operational risk work. Frontline staff told us that this system is often slow and is not easy to use. It also creates inefficiencies by duplicating work, which staff find frustrating. The service also needs to ensure that it fully trains staff in the IT systems.

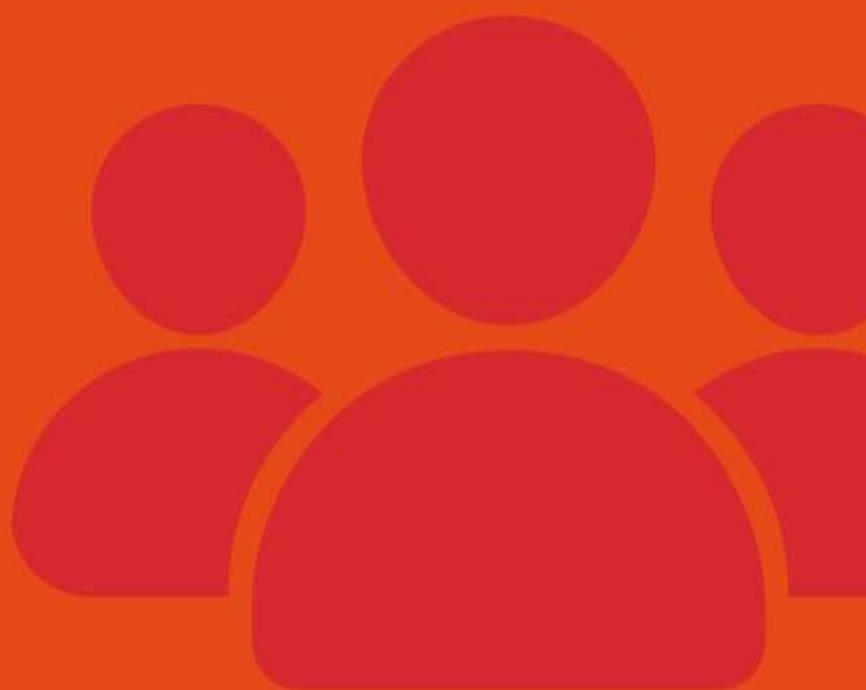
Future investment and working with others

The service has exploited opportunities for external funding. These include a £377,000 grant to provide emergency medical response with South East Coast Ambulance Service. The trial has now stopped. The service awaits the outcomes of negotiations at national level between the employers and the representative bodies. The service believes the ongoing benefits to the public would include better trained firefighters with access to more medical equipment.

In May 2015, the service received £5.95m in funding for its integrated transport function project. This is a collaboration between Surrey and Sussex fire and police. The aim is to increase capacity and reduce the cost of the transport function across these organisations. The project is happening more slowly than planned. It has not yet produced real financial benefits.

The service has not invested well in its estate and fleet. The service's hot fire house is unusable for realistic breathing apparatus training. But it has alternative arrangements in place. The service is using fire engines for longer than was planned instead of renewing them. Although the service is purchasing new fire engines, it is unclear how it is collaborating to reduce the costs.

People



How well does the service look after its people?



Requires improvement

Summary

A fire and rescue service that looks after its people should be able to provide an effective service to its community. It should offer a range of services to make its communities safer. This will include developing and maintaining a workforce that is professional, resilient, skilled, flexible and diverse. The service's leaders should be positive role models, and this should be reflected in the behaviour of the workforce. Overall, Surrey Fire and Rescue Service requires improvement at looking after its people.

The service requires improvement in promoting the right values and culture. It has the facilities to support staff wellbeing. But it needs to assure itself that managers know how to support staff as needed. Staff understand their role in keeping each other safe. They consider the processes for raising safety concerns effective. A staff survey conducted by the service in 2017 told it that leaders need to do more to model service values. The service is working on this. It launched a new set of values and behaviour in 2017 and involved staff in this. But staff do not show great awareness of the new values in their use of language at work. The service needs to assure itself that staff adopt the new values and forms of behaviour. Staff are proud of their work but find the increasing workloads hard to bear.

The service requires improvement at getting the right people with the right skills. Its 2017 people strategy describes its future workforce needs and possible performance difficulties. But it is not clear how this strategy relates to the savings planned in the service's medium-term financial plan. The service relies heavily on overtime. But it does not have enough controls to manage staff working hours. It recently removed overtime limits. This could have an impact on staff welfare. The service has a system for recording staff training. Only managers can access it. The competency recording system can make it difficult for managers to check whether standby moves and staff working overtime on a watch need training. The service's dedicated training team maintains core competencies and manages staff development. The learning opportunities are good for frontline staff, but

less so for support and control staff. The service offers some courses via an e-learning system. Not all learners complete the assigned activities when they are told to. The service should monitor e-learning completion rates.

The service requires improvement at ensuring fairness and promoting diversity. It surveys staff each year, but the response rates are falling. We asked staff about this and they told us that the service did not explain, or act on, the outcomes of previous surveys. Staff know how to use the service's grievance policy. But we found that many grievances get resolved locally with little or no documentation. This is not the service's policy. The service engages with the largest union, but not with all the other representative bodies. Engagement with all unions should give the workforce a voice and help the service to achieve the level of engagement it aspires to.

The service recognises that the diversity of its workforce does not reflect that of the community it serves. It has an inclusion strategy and intends to improve this. It could do more to engage people from underrepresented groups in its workforce.

The service requires improvement at managing performance and developing leaders. Staff use the service's appraisal process to access development opportunities. But we couldn't see how the service uses the process to manage performance. We could see no evidence that the service has trained managers in the appraisal process. This may result in missed opportunities to manage underperformance or nurture talent. The service has processes for promotion, but needs to explain these better to staff. Frontline staff have a formalised development process, but this is not so much the case for support staff. The service acknowledges that it has no formal process for managing talent.

Promoting the right values and culture



Requires improvement

Areas for improvement

- The service should ensure its values and behaviours are understood and demonstrated at all levels of the organisation.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Workforce wellbeing

The service has facilities to support the wellbeing of its staff. They include an occupational health services department, which has recently merged with that of Surrey Police. The service should ensure it tells staff about the potential benefits of this merger.

Staff recognise the benefit of specially trained service personnel who provide critical debriefs following traumatic incidents. This year, staff will receive Mind's Blue Light training, which supports the mental health of emergency service staff. Managers have a crucial role in supporting staff welfare. The service needs to assure itself that managers have the skills to do this.

Health and safety

The service has a positive health and safety culture. Staff are well trained and understand their role in keeping each other safe. There is a well-established service-wide framework. It includes health and safety representatives and committees that deal with health and safety issues. Staff can raise and address any concerns about health and safety. Staff think this is effective. An example of this is the ongoing work to reduce the health impacts of exhaust fumes at fire stations.

Culture and values

The last service staff survey in 2017 highlighted that senior leaders need to do more to model service values. The service has plans to improve this. For example, the service engaged a management development company to help senior leaders to develop a more inclusive leadership style.

The service has an initiative called Brew with the boss, which is a more informal way for senior managers to meet staff. The service has yet to assess the effectiveness of this initiative.

In 2017, after talking with the workforce, the service launched a new set of values and behaviour. They include professionalism, leadership, fairness and respect, honesty and integrity, responsibility and openness. We didn't find much awareness of these among staff. We observed consistent use of non-inclusive language in the workplace. The service needs to assure itself that these values and behaviours help to shape and develop an inclusive culture.

The service communicates with staff through email newsletters, face-to-face briefings and with Yammer (a Facebook-type platform). We found that use of Yammer was inconsistent across the workforce. The service needs to assure itself that staff receive key messages across its communication channels.

Staff we spoke to were proud to serve their communities and wanted to do their best. But people across the service told us that increased workloads and too few staff were making this increasingly difficult.

Senior leaders should ensure the new value and behaviour statements create a culture that helps the staff to achieve the service's vision. The culture should also support staff in putting the public at the heart of everything they do.

Getting the right people with the right skills



Requires improvement

Areas for improvement

- The service should ensure it has clear and robust processes to manage staff overtime.
- The service should ensure staff and managers use its competence recording system and e-learning platform effectively.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Workforce planning

The service describes its workforce difficulties in its IRMP. In 2017, it published a people strategy that details future workforce needs and the performance difficulties it faces.

The service's medium-term financial plan (MTFP) highlights the savings it needs to make. For example, it needs to reduce staff across the middle-management level of the workforce. It is not clear how the people strategy is linked to the MTFP. This means the service may not have the funding available to achieve the aspirations set out in the people strategy. Nor was it clear how the service will maintain service levels while reducing middle-manager numbers.

We found that the service relies on staff working overtime. There is a need for a properly managed system to support how the service responds to fires and other emergencies. The service must make sure it uses all its resources in the most efficient way. We found that the service doesn't have enough controls to manage the working hours of wholetime staff. The service has a reduced workforce, no clear policy on managing overtime and has recently removed overtime limits. It needs to monitor overtime closely. We found managers' approach to overtime to be inconsistent and retrospective. It could have an impact on the welfare of staff.

A system is in place to manage shortfalls in crewing numbers, but this is localised. The service suffers from a shortage of firefighters to crew fire engines. Day-to-day crewing decisions lie with the senior duty manager, who uses the dynamic cover tool and a degradation policy. This policy considers the impact of reduced staffing levels and resulting reduction in appliances. The senior duty manager decides which stations are temporarily closed and which fire engines are unavailable during that time. This provides some consistency and control in managing operational resources.

The service does not keep an accurate record of staff with secondary employment. It has a policy that says it should collect this information. But we didn't find any evidence to show how the service manages this to create a clear workforce picture. This could limit effective planning and the safe deployment of staff.

Learning and improvement

The service recognises the benefits of a well-trained workforce. It has a dedicated training team that supports core competencies and staff development. One example of this is the level of fire protection training given to staff. Another is the accreditation for managers through nationally recognised health and safety bodies. The service brings in external companies to supplement skills training, for example, in training in higher levels of incident command for operational managers. The service also sends its staff to external providers for training in skills that it cannot deliver in-house. Examples include emergency planning and management training.

The service's managers use a recording system for staff training called Fire Watch. Only managers can access this system. We found little evidence to show how the service reviews records on the system to ensure they are accurate. The service uses an e-learning system. But there is little quality assurance to ensure e-learning packages have been completed and understood. Operational managers can access the training records of staff working overtime or standing by on their watch. However, we found managers were not always aware of how to do this, which limits their ability to plan appropriate training for staff to cover shifts through standby or overtime.

The service's training team assesses core skills for operational staff at set frequencies. The service maintains these skills at a station level through local training. We found that staff cannot always book risk-critical training courses because of their limited availability or course cancellations. This was evident in risk-critical breathing apparatus and hot fire training. When this happens, the line manager assesses and records the individual's skill. A senior manager then signs it off until the individual can attend a course. The learning and development team monitors this centrally.

While there is a good system for learning in place for operational staff, this was less evident with support and control staff. The service supports the learning of its staff with an e-learning system, which uses videos and online questions and answers to support staff competencies. E-learning content ranges from operational knowledge to safeguarding. Staff can access it from any computer. We found use of the e-learning system to be inconsistent. Not all learners completed the activities assigned to them within the given timeframes. The service should clearly explain the e-learning part of its learning and development offer. It should then ensure it has a robust system to monitor completion rates.

Ensuring fairness and promoting diversity



Requires improvement

Areas for improvement

- The service should assure itself that it has effective grievance procedures which include clearly documented actions and outcomes.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Seeking and acting on staff feedback

The service seeks the views of its staff through an annual survey. The service informed us that over the last two years the response rate has fallen from 43 percent in 2016 to 40 percent in 2017 despite the service's aspiration for a 100-percent return rate. Staff told us that the service did not share the outcomes of previous surveys with them. Staff also did not recognise any changes made because of their feedback. The service should do more to increase the engagement of staff with the survey. It must also ensure that it acts on outcomes and tells staff about this.

There is a grievance policy that staff know how to access. But we found little evidence to show that the service follows the policy. Staff described resolving grievances informally at a local level with limited or no documentation to explain resolutions. This is contrary to organisational policy. The service must do more to document what it does when staff raise a grievance and what the result is.

The service engages well with the largest staff representative body. Well-established lines of communication allow the representative body to raise concerns on behalf of their members. This group also forms part of the workforce reform team and is a co-designer of new service initiatives. The Fire Brigades Union writes a chapter of the IRMP. Engagement with other representative bodies is less well established. The service needs to ensure that its whole workforce has a voice and representation in any change. The service's people strategy says the service aspires to have an engaged workforce. Giving the entire workforce a voice should help the service achieve this aspiration.

Diversity

The service workforce does not reflect the diversity of the communities it serves. As at 31 March 2018, only 4.2 percent (25) of firefighters were female and 2.5 percent (13) were from a black, Asian and minority ethnic (BAME) background (the BAME residential population is 9.6 percent). The service recognises this and has produced an inclusion strategy setting out how it intends to improve. It acknowledges this is still at an early stage.

In 2018, the service launched its first recruitment campaign for whole-time firefighters in seven years. The service has worked closely with the Surrey police force to locate and overcome the barriers preventing the recruitment of a more diverse workforce, although positive outcomes from this are yet to become apparent.

The service could do more to engage and consult with people from under-represented groups already in the organisation. We found no use of engagement groups or staff networks in developing service strategies to increase diversity and inclusion.

Managing performance and developing leaders



Requires improvement

Areas for improvement

- The service should put in place an open and fair process to identify, develop and support high-potential staff and aspiring leaders.

We set out our detailed findings below. These are the basis for our judgment of the service's performance in this area.

Managing performance

All staff complete an annual appraisal process annually which is reviewed every six months. This is a county council system, completed electronically by the line manager. It covers work-related goals and personal objectives. Staff told us appraisals were a good place to access development opportunities, for example technical or management courses. It was less clear how the service uses the appraisal process to support and manage staff. And we couldn't see how it linked to any performance management targets.

Staff felt the benefits and value of the appraisal system relied on the skills of the manager completing it. Some described it as serving a valuable purpose. Others felt it was a tick box exercise, done inconsistently. Staff see the process as a means to support development rather than manage performance.

There was little evidence to show how the service had trained its managers to do appraisals. We didn't learn what the service hoped to achieve from them. Managers explained this was particularly important with the introduction of a new appraisal system in 2017. This could limit the value the service gets from its appraisals. The service may be missing opportunities to record underperformance or nurture talent in the workforce.

Developing leaders

The service has processes to promote its staff. These include formalised assessment centres. But it needs to ensure that it effectively communicates the pathways for these. We found that operational staff could access development through the appraisal process, which led to formalised development programmes. This was less evident for support staff.

The service does not have a process to manage staff with high potential. It acknowledges the importance of this within the people strategy. Currently, the service leaves identification of talent to individuals or to their line managers.

Annex A – About the data

Data in this report is from a range of sources, including:

- Home Office;
- Office for National Statistics (ONS);
- Chartered Institute of Public Finance and Accountancy (CIPFA);
- our inspection fieldwork; and
- data we collected directly from all 45 fire and rescue services in England.

Where we use published Home Office data, we use the period to 31 March. We selected this period to be consistent across data sets. Some data sets are published annually, others quarterly. [The most recent data tables are available online.](#)

We use different data periods to represent trends more accurately.

Where we collected data directly from fire and rescue services (FRSs), we took reasonable steps to agree the design of the data collection with services and with other interested parties such as the Home Office. We gave services several opportunities to validate the data they gave us, to ensure the accuracy of the evidence presented. For instance:

- We checked and queried data that services submitted if notably different from other services or internally inconsistent.
- We asked all services to check the final data used in the report and correct any errors identified. Data that services submitted to the Home Office in relation to prevention, protection and workforce figures was published in November 2018. This data was updated after reports had been checked by services, so we haven't validated it further.

We set out the source of Service in numbers data below.

Methodology

Population

For all uses of population as a denominator in our calculations, unless otherwise noted, we use [ONS mid-2017 population estimates](#). This is the most recent data available at the time of inspection.

BMG survey of public perception of the fire and rescue service

We commissioned BMG to survey attitudes towards fire and rescue services in June and July 2018. This consisted of 17,976 interviews across 44 local fire and rescue service areas. This survey didn't include the Isles of Scilly, due to its small population. Most interviews were conducted online, with online research panels.

However, a minority of the interviews (757) were conducted via face-to-face interviews with trained interviewers in respondents' homes. A small number of respondents were also interviewed online via postal invitations to the survey. These face-to-face interviews were specifically targeted at groups traditionally under-represented on online panels, and so ensure that survey respondents are as representative as possible of the total adult population of England. The sampling method used isn't a statistical random sample. The sample size was small, varying between 400 and 446 individuals in each service area. So any results provided are only an indication of satisfaction rather than an absolute.

[Survey findings are available on BMG's website.](#)

Service in numbers

A dash in this graphic indicates that a service couldn't give data to us or the Home Office.

Perceived effectiveness of service

We took this data from the following question of the public perceptions survey:

How confident are you, if at all, that the fire and rescue service in your local area provides an effective service overall?

The figure provided is a sum of respondents who stated they were either 'very confident' or 'fairly confident'. Respondents could have also stated 'not very confident', 'not at all confident' or 'don't know'. The percentage of 'don't know' responses varied between services (ranging from 5 percent to 14 percent).

Due to its small residential population, we didn't include the Isles of Scilly in the survey.

Incidents attended per 1,000 population

We took this data from the Home Office fire statistics, '[Incidents attended by fire and rescue services in England, by incident type and fire and rescue authority](#)' for the period from 1 April 2017 to 31 March 2018.

Please consider the following points when interpreting outcomes from this data.

- There are six worksheets in this file. The 'FIRE0102' worksheet shows the number of incidents attended by type of incident and fire and rescue authority (FRA) for each financial year. The 'FIRE0102 Quarterly' worksheet shows the number of incidents attended by type of incident and FRA for each quarter. The worksheets 'Data fires', 'Data fire false alarms' and 'Data non-fire incidents' provide the raw data for the two main data tables. The 'Figure 3.3' worksheet provides the data for the corresponding chart in the statistical commentary.
- Fire data, covering all incidents that FRSs attend, is collected by the Incident Recording System (IRS). For several reasons some records take longer than others for FRSs to upload to the IRS. So totals are constantly being amended (by relatively small numbers).
- We took data for Service in numbers from the August 2018 incident publication. So figures may not directly match more recent publications due to data updates.

Home fire risk checks per 1,000 population

We took this data from the Home Office fire statistics, '[Home fire risk checks carried out by fire and rescue authorities and partners, by fire and rescue authority](#)' for the period from 1 April 2017 to 31 March 2018.

Each FRS's figure is based on the number of checks it carried out and doesn't include checks carried out by partners.

Please consider the following points when interpreting outcomes from this data.

- Dorset FRS and Wiltshire FRS merged to form Dorset and Wiltshire FRS on 1 April 2016. All data for Dorset and Wiltshire before 1 April 2016 is excluded from this report.
- The England total hours figures for 'Number of Fire Risk Checks carried out by FRS' include imputed figures to ensure a robust national figure. These imputed figures are: '2016/17 – Staffordshire'.
- Figures for 'Fire Risk Checks carried out by Elderly (65+)', 'Fire Risk Checks carried out by Disabled' and 'Number of Fire Risk Checks carried out by Partners' don't include imputed figures because a lot of FRAs can't supply these figures.

Home fire risk checks may also be referred to as Home Fire Safety Checks by FRSs.

Fire safety audits per 100 known premises

Fire protection refers to FRSs' statutory role in ensuring public safety in the wider built environment. It involves auditing and, where necessary, enforcing regulatory compliance, primarily but not exclusively in respect of the provisions of the [Regulatory Reform \(Fire Safety\) Order 2005 \(FSO\)](#). The number of safety audits in Service in numbers refers to the number of audits FRSs carried out in known premises.

According to the Home Office definition, “premises known to FRAs are the FRA’s knowledge, as far as possible, of all relevant premises; for the enforcing authority to establish a risk profile for premises in its area. These refer to all premises except single private dwellings”.

We took this from the Home Office fire statistics, '[Fire safety audits carried out by fire and rescue services, by fire and rescue authority](#)' for the period from 1 April 2017 to 31 March 2018.

Please consider the following points when interpreting outcomes from this data.

- Berkshire FRS didn't provide figures for premises known between 2014/15 and 2017/18.
- Dorset FRS and Wiltshire FRS merged to form Dorset and Wiltshire FRS on 1 April 2016. All data for Dorset and Wiltshire before 1 April 2016 is excluded from this report.
- Several FRAs report 'Premises known to FRAs' as estimates based on historical data.

Firefighter cost per person per year

We took the data to calculate firefighter cost per person per year from the annual financial data returns that individual FRSs complete and submit to CIPFA, and [ONS mid-2017 population estimates](#).

You should consider this data alongside the proportion of firefighters who are wholetime and on-call / retained.

Number of firefighters per 1,000 population, five-year change in workforce and percentage of wholetime firefighters

We took this data from the Home Office fire statistics, '[Total staff numbers \(full-time equivalent\) by role and by fire and rescue authority](#)' as at 31 March 2018.

Table 1102a: Total staff numbers (FTE) by role and fire authority – Wholetime Firefighters and table 1102b: Total staff numbers (FTE) by role and fire authority – Retained Duty System are used to produce the total number of firefighters.

Please consider the following points when interpreting outcomes from this data.

- We calculate these figures using full-time equivalent (FTE) numbers. FTE is a metric that describes a workload unit. One FTE is equivalent to one full-time worker. But one FTE may also be made up of two or more part-time workers whose calculated hours equal that of a full-time worker. This differs from headcount, which is the actual number of the working population regardless if employees work full or part-time.
- Some totals may not aggregate due to rounding.
- Dorset FRS and Wiltshire FRS merged to form Dorset and Wiltshire FRS on 1 April 2016. All data for Dorset and Wiltshire before 1 April 2016 is excluded from this report.

Percentage of female firefighters and black, Asian and minority ethnic (BAME) firefighters

We took this data from the Home Office fire statistics, '[Staff headcount by gender, fire and rescue authority and role](#)' and '[Staff headcount by ethnicity, fire and rescue authority and role](#)' as at 31 March 2018.

Please consider the following points when interpreting outcomes from this data.

- We calculate BAME residential population data from ONS 2011 census data.
- We calculate female residential population data from ONS mid-2017 population estimates.
- Dorset FRS and Wiltshire FRS merged to form Dorset and Wiltshire FRS on 1 April 2016. All data for Dorset and Wiltshire before 1 April 2016 is excluded from this report.

Annex B – Fire and rescue authority governance

These are the different models of fire and rescue authority (FRA) governance in England. Surrey Fire and Rescue Service is a unitary authority.

Metropolitan FRA

The FRA covers a metropolitan (large urban) area. Each is governed by locally elected councillors appointed from the constituent councils in that area.

Combined FRA

The FRA covers more than one local authority area. Each is governed by locally elected councillors appointed from the constituent councils in that area.

County FRA

Some county councils are defined as FRAs, with responsibility for fire and rescue service provision in their area.

Unitary authorities

These combine the usually separate council powers and functions for non-metropolitan counties and non-metropolitan districts. In such counties, a separate fire authority runs the fire services. This is made up of councillors from the county council and unitary councils.

London

Day-to-day control of London's fire and rescue service is the responsibility of the London fire commissioner, accountable to the Mayor. A Greater London Authority committee and the Deputy Mayor for Fire scrutinise the commissioner's work. The Mayor may arrange for the Deputy Mayor to exercise his fire and rescue functions.

Mayoral Combined Authority

Only in Greater Manchester. The Combined Authority is responsible for fire and rescue functions but with those functions exercised by the elected Mayor. A fire and rescue committee supports the Mayor in exercising non-strategic fire and rescue functions. This committee is made up of members from the constituent councils.

Police, fire and crime commissioner FRA

The police, fire and rescue commissioner is solely responsible for the service provision of fire & rescue and police functions.

Isles of Scilly

The Council of the Isles of Scilly is the FRA for the Isles of Scilly.

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Consultation Report

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1. Context

This report summarises the findings of the public consultation on the [Making Surrey Safer Plan 2020 – 2023 that was undertaken from 4 March 2019 – 26 May 2019](#).

The [Fire and Rescue National Framework for England](#) requires that all Fire and Rescue Authorities produce an Integrated Risk Management Plan which considers all the fire and rescue related risks that could affect our communities. This is contained in the Making Surrey Safer Plan and associated appendices. We want to develop a wide reaching approach to managing risk, not just in the home and workplace but in every place where we can influence behaviour and encourage a safer attitude and environment, whilst still ensuring we respond to emergencies well.

This consultation explored the three proposals contained within the draft plan:

- To spend more time on business and community safety to help prevent emergencies occurring in the first place
- To maintain the number of fire stations in Surrey and change how some of them are crewed
- To recover costs from some non-emergencies to re-invest in SFRS

This evidence will support Surrey County Council's Cabinet in deciding how to proceed in relation to the proposals.

This consultation report should be read alongside the Equality Impact Assessment (EIA) which has been reviewed and updated following the consultation period.

2. Methodology

The service used a mix of quantitative and qualitative research methods, as well as a comprehensive mix of communication channels to gather the views of our residents, staff, partners and stakeholders (see Appendix 1 for details).

3. Analysis

The consultation received feedback from over 1,800 individuals and groups, through the consultation survey, letters and face to face engagement events.

3.1 Survey – quantitative responses

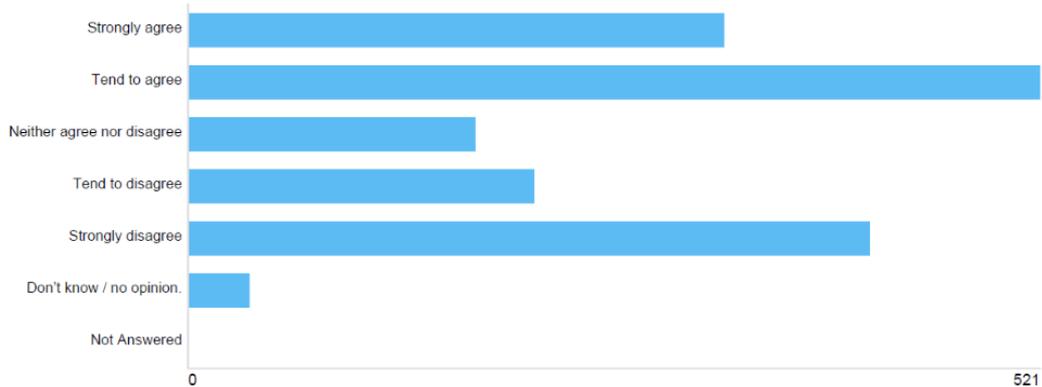
- There were 1687 responses to the survey compared to 600 responses on our previous IRMP consultation. This represents 0.14% of the Surrey population, which is estimated to be 1, 185, 300 (*The Office for National Statistics (ONS)*).

- The EIA identifies potential impacts for the elderly, young people, people with disabilities and mental health conditions and for carers. Therefore, the analysis will focus on responses from people with these particular protected characteristics

Question 4

Question 4: To what extent do you agree or disagree that SFRS should adopt a risk based approach and focus resources where they are needed, and when they are needed?

Risk based approach



Response	Total	Percent
Strongly agree	327	19.38%
Tend to agree	521	30.88%
Neither agree nor disagree	175	10.37%
Tend to disagree	211	12.51%
Strongly disagree	416	24.66%
Don't know / no opinion.	37	2.19%

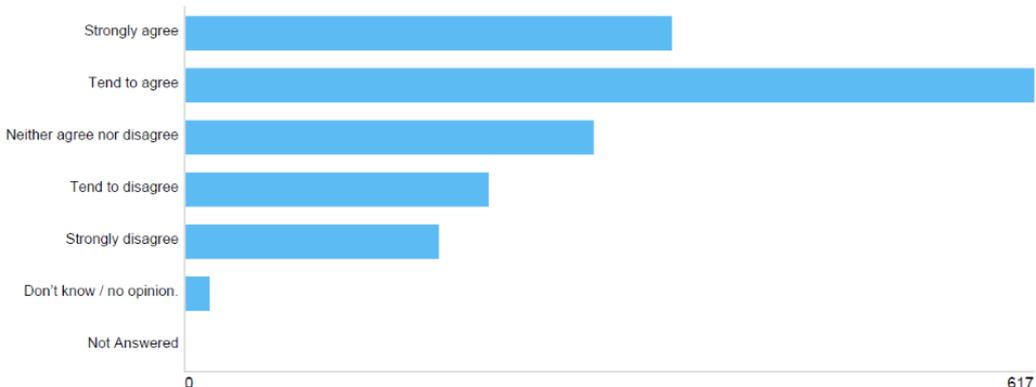
A small majority of respondents showed support for this proposal with 50.3% either strongly agreeing or tending to agree.

In the 65+ age group who we know are more vulnerable to fire death and injury, this figure is slightly higher with 59.3% of respondents in this age group either strongly agreeing or tending to agree with the proposal.

Question 5

Question 5: To what extent do you agree or disagree that SFRS should spend more time on community and business safety to help prevent incidents occurring in the first place?

More time preventing incidents occurring



Response	Total	Percent
Strongly agree	353	20.92%
Tend to agree	617	36.57%
Neither agree nor disagree	296	17.55%
Tend to disagree	220	13.04%
Strongly disagree	184	10.91%
Don't know / no opinion.	17	1.01%

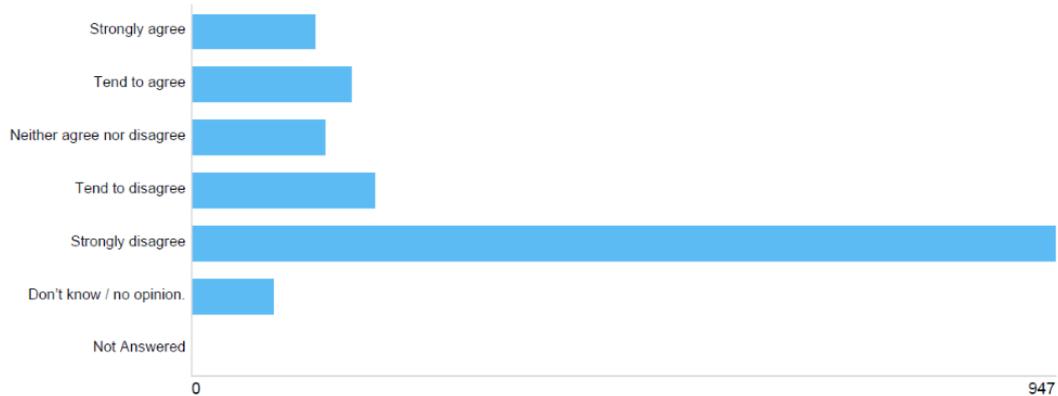
A majority of respondents agreed with this proposal with 57% either strongly agreeing or tending to agree.

This figure was higher (64%) amongst respondents who said they were limited a little or limited a lot by a disability or mental health condition. This correlates with the EIA which identified positive impacts for groups including the elderly and those with a disability, by increasing business and community safety activities including targeted safe and well visits.

Question 6

Question 6: To what extent do you agree or disagree with SFRS maintaining the number of fire stations and fire engines in Surrey but changing how Banstead, Camberley, Egham, Fordbridge, Guildford, Haslemere, Painshill, Walton and Woking are crewed at night?

Changing crewing at some fire stations



Response	Total	Percent
Strongly agree	134	7.94%
Tend to agree	174	10.31%
Neither agree nor disagree	145	8.60%
Tend to disagree	199	11.80%
Strongly disagree	947	56.14%
Don't know / no opinion.	88	5.22%

The majority of respondents disagree with this proposal with 56% strongly disagreeing and 12% tending to disagree.

This opinion was also expressed widely in responses to the free text question (see section 3.2) and in other responses including letters, staff briefings and community meetings.

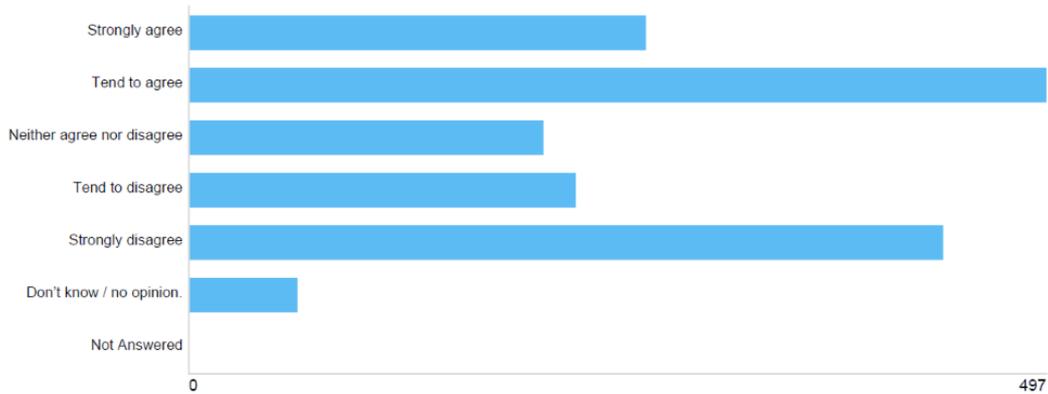
Young people - were more divided in their opinions in relation to this question. Of those aged 16-24, 28% supported these proposals, 28% neither agreed nor

disagreed and 41% didn't agree, however this group only represent 5.16% of respondents who completed the survey.

Question 7

Question 7: To what extent do you agree or disagree with increasing the catchment area for on-call firefighters to aid recruitment?

Increasing catchment area for on-call firefighters



More respondents agreed than disagreed with this proposal with 45.11% either tending to agree or strongly agreeing with it.

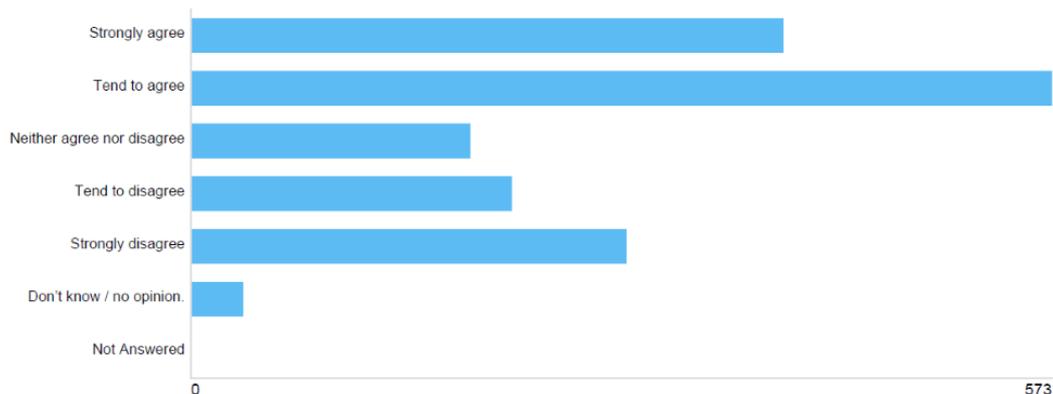
The majority of younger people (aged 16-29) and people aged 50 and over agreed or strongly agreed with this proposal whereas those aged between 30 and 49 years old tended to disagree.

Overall, 68.61% who were in agreement were women, compared to 31.39% for men.

Question 8

Question 8: To what extent do you agree or disagree that the service recovers costs from some non-emergencies to re-invest in SFRS?

Recovering costs to re-invest in SFRS



Response	Total	Percent
Strongly agree	393	23.30%
Tend to agree	573	33.97%
Neither agree nor disagree	185	10.97%
Tend to disagree	213	12.63%
Strongly disagree	289	17.13%
Don't know / no opinion.	34	2.02%

The majority of respondents agree with this proposal with 57.27% either strongly agreeing or tending to agree. This appears to be slightly contradictory with the qualitative feedback which shows a feeling against charging for services, particularly animal rescue.

There were very low levels of disagreement amongst those who have a disability or mental health condition and those that care for others.

3.2 Survey - qualitative responses

Respondents were asked if they had any further comments on the draft plan. Of all the responses, 1053 (62%) of respondents chose to comment. The key themes that arose were:

- **Reductions in staff and appliances**

This was the strongest theme to emerge in the qualitative feedback with 449 (26%) people expressing concerns. This correlates with the answer to the quantitative question (Q6) which showed disagreement for changing fire cover.

Respondents felt they would be less safe due to waiting longer for fire engines to arrive. Some commented that the current level of fire cover should remain and others felt firefighters would be at risk if there were fewer of them.

- **Reducing the night time response**

23% of people who answered the survey, raised concerns about reducing the number of fire engines and firefighters, specifically at night. Many respondents felt that most fires happen at night and that lives would be more at risk due to people sleeping. Others were concerned about areas where night cover would come from neighbouring fire stations. This theme links to the above and was regularly referenced at staff briefings, on social media, in letters and at community engagement meetings.

Respondents often agreed with doing more business and community safety but felt that this was at the expense of emergency cover.

- **Charging for services**

232 (13%) people made comments about charging for services, particularly animal rescue, making this the third strongest theme to arise from the survey.

People felt that their animals may be at risk and they would be unable to help them which could lead to animals dying.

There was however widespread support in the qualitative comments for charging for other services, particularly false alarms and hoax calls. The response to question eight also highlighted support for this proposal.

- **Perception that the changes are about cost cutting**

8% of people who completed this question felt that the proposed changes were about cost cutting.

Respondents frequently shared their opinions that the plan was about making savings for Surrey County Council.

Other lesser mentioned themes (by less than 8% of respondents) were:

- Agreement with realigning resources
- Agreement with improving prevention activity
- Agreement with expanding catchment areas
- Detrimental effect on airport/motorway cover
- The effect of less resources to deal with new buildings and infrastructure
- Concern about staff welfare and morale
- Disliked how the survey was worded
- Proposals appear to be misleading
- Colour coding in document not accessible for colour blind people
- Concerns about increasing catchment areas for Dunsfold and Gomshall

- Consideration should be given to reducing senior positions
- Increasing staff training
- Fordbridge fire station
- Improving cover in rural areas
- Governance of the fire and rescue service.

3.3 Letters

There were nine postal responses to the consultation from district, borough and parish councils which have been reviewed. Key themes emerging from these are in line with those in the survey feedback and summarised as follows:

- Acknowledging the need to review SFRS
- Agreement with risk-based approach and more prevention activity
- The need to consider response for nearby major rail and road networks
- Rising population and housing growth
- Perception that the proposals are about cost cutting
- Disagreement with reductions in day and night response cover
- Concerns about crewing levels
- Concerns about 'empty' fire stations
- Concerns about vulnerable people being more at risk if the proposals are implemented
- The need to align with district and borough plans
- Disagreement that there were more questions in the survey about the respondents than the proposals

3.4 Engagement meetings

Officers received good feedback from these meetings and identified ways of working in the future to benefit residents, especially the most vulnerable.

Vision Action Group

Members asked questions which included queries about Esher fire station, the validity of the draft plan and how the service works with vulnerable groups. No specific feedback on the proposals was given from the group at the meeting.

Long Term Neurological Conditions Community Group

Concerns were raised by the group that the proposed increase in response times will affect those with restricted mobility who cannot self-rescue if alerted by a smoke alarm.

Members of the group asked questions about savings and also highlighted the value of the service working with others including housing providers and landlords to consider fire safety for vulnerable residents.

East Disability Empowerment network

Members of the group asked questions about the methods of accessing the prevention services and which department to contact. A concern was expressed about adherence to national response time definitions. The risk based, locally oriented approach was explained. The group also asked for information about progress with the co-responding initiatives allowing firefighters to utilise their many skills to assist elderly people.

Haslemere Lunch Club

Club members valued the presentation. One of the members wrote to the organiser to say: "The presentation about making Surrey safer was well received by the members. They would welcome other presentations in the future."

Local Committee meetings

All local and joint committees were offered face to face briefings. Officers attended informal (private) meetings with Mole Valley, Reigate & Banstead and Elmbridge Local Committees to give an overview of the consultation and take questions. Individual comments were noted.

3.5 Colleague feedback

Members of fire and rescue staff were given the opportunity to attend a face to face briefing, led by the Senior Leadership Team. The feedback from these sessions is summarised as follows:

- Concerns about reducing the number of fire engines and firefighters, specifically at night
- Some people raised concerns about adequate resources for high rise fires
- Charging for animal rescue was raised by some individuals as a concern
- Some disliked the wording of the survey
- Questions regarding shift patterns, staff safety and data were raised regularly.

Surrey's Fire Brigades Union (FBU) submitted a response to the consultation via email. The full response is available on the Surrey FBU [website](#).

3.6 Other

There have been 96 contacts via the survey email. These have consisted of questions, concerns and comments from councillors, staff and residents. Requests for information have been honoured.

3.7 About You questions

To make sure we provide services equally and fairly we asked our survey participants to answer some questions about themselves. Answering was optional and the information gathered is held in the strictest confidence at the individual participant level and is only summarised in aggregate in this report.

- **Age:**

92% of respondents answered this question. The majority of respondents who completed the question belong to 40 - 44 and 50 - 54 age groups.

We know that people over 65 are at higher risk of fire death and injuries. Approximately 14% of people from this age group answered this question.

We also know that young people are at most risk of deaths and injuries from road traffic collisions. 5% of respondents were aged 16 - 24.

- **Disability:**

Mobility issues and mental health issues are known to be fire risk factors. Of the 1558 people that answered the question about health problems and disability, 253 respondents (16%) said that they had a condition that either limited them a lot or a little.

- **Gender:**

54% of survey participants who answered the gender question were female and 30% were male. 8 (0.4742%) respondents said their gender was different from the gender assigned to them at birth.

- **Ethnicity:**

76% of people who answered this question identified their ethnic group as British, English, Northern Irish, Scottish or Welsh. 18.3% of people preferred not to say or didn't answer this question.

- **Religion:**

The majority of respondents who answered this question (44%) stated their religion as Christian, followed by 37% who declared no religion.

- **Sexual orientation:**

1.7% of the people completing the equalities questions defined themselves as bisexual. 12% preferred not to say and 70% selected heterosexual/straight.

- **Pregnancy and maternity leave:**

1.7% of respondents said they were pregnant or on maternity leave.

- **Marital or same-sex status:**

The majority of people (799) who answered this question gave their status as married, followed by 16% who preferred not to say. 0.65% are in a registered same-sex civil partnership.

4 Key findings

Amongst the individuals and groups (0.14% of the Surrey population) who responded to the consultation:

- The majority of people agree with adopting a risk-based approach
- Most people agree with the proposal to spend more time on prevention and protection activities (Business and Community Safety)
- The majority of people disagree with the proposal to change how some fire stations are crewed
- Most people agree with recovering costs from some incidents and to re-invest in SFRS. However, charging for animal rescues was less favoured
- Most people agree with expanding the recruitment area for On-Call firefighters to aid recruitment

5 Next steps

This consultation report will be included as evidence in the paper outlining the proposals to Communities, Environment and Highways Select Committee on 19 September 2019 and submitted for decision at Surrey County Council's Cabinet on 24 September 2019. If the proposals are approved, a delivery plan will be implemented, and the actions outlined in the Equality Impact Assessment will be considered.

Appendix 1 – communication activities

Direct contact:

- 37 face to face briefings offered to all SFRS staff at fire stations were attended by 371 members of staff.
- Briefing for SCC Chairman's Group meeting
- Presentations/briefings for Elmbridge, Mole Valley and Reigate & Banstead informal local committees
- Presentation at Surrey Police Independent Advisory Group meeting
- Member workshop
- Briefing and Q&A for the Vision Action Group
- Briefing and Q&A for Long Term Neurological Conditions Community Group
- Briefing and Q&A for the East Disability Empowerment network
- Briefing and Q&A for the Haslemere Lunch Club
- Information shared (by email) with all members of the Surrey Equality Group, Faith Groups, Surrey Minority Ethnic Forum and Sight for Surrey
- Information shared by Catalyst (drug and alcohol service)
- Information shared by Surrey Youth Cabinet (via social media)
- Regular member briefings and FAQs
- Emails to staff

Print:

- Full and summary versions of the draft plan and questionnaires distributed to libraries, district and borough offices, SCC's contact centre and members of the public (on request)
- Emails to approximately 200 stakeholders, including other emergency services (e.g. Police, NHS, Ambulance and other fire and rescue services), Surrey MPs, borough and county councillors, district and borough council leaders & chief executives, parish councils, business groups, Surrey Coalition of Disabled People members and other partners
- Posters issued to fire stations, libraries, district and boroughs, colleges, community centres, churches, resident associations and parish councils

- Postcards issued to libraries and district and boroughs
- Roadside banners at Reigate, Guildford, Camberley, Woking, Walton, Painshill, Sunbury and Egham fire stations
- Articles in newsletters including Surrey Matters, e-brief, Issues Monitor and Communicate.
- Newspaper advertising
- Media – the proposals featured in many items of media during the consultation period, including BBC Surrey radio, Eagle Radio, the Surrey Advertiser and the Herald series. Media work included media releases, a video and radio interviews

Online:

- Standard and accessible formats (easy read, audio, screen reader and large print from May 2019) of the draft plan/summary document
- On-line consultation survey
- Regular social media promotion on SFRS Twitter and Facebook and SCC Surrey Matters account
- Online advertising, Facebook promoted posts and messenger scrolling text banner.

Appendix 2 – survey questions

- To what extent do you agree or disagree that SFRS should adopt a risk based approach and focus resources where they are needed, and when they are needed?
- To what extent do you agree or disagree that SFRS should spend more time on community and business safety to help prevent incidents occurring in the first place?
- To what extent do you agree or disagree with SFRS maintaining the number of fire stations and fire engines in Surrey but changing how Banstead, Camberley, Egham, Fordbridge, Guildford, Haslemere, Painshill, Walton and Woking are crewed at night?
- To what extent do you agree or disagree with increasing the catchment area for on-call firefighters to aid recruitment?
- To what extent do you agree or disagree that the service recovers costs from some non-emergencies to re-invest in SFRS?
- Do you have any further comments on the draft Making Surrey Safer plan

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COMMUNITY RISK MANAGEMENT

**Building intelligence to support
Business and community safety and response
strategies across Surrey**

Surrey Fire and Rescue Community Risk Profile

Date of publication 08/02/2019

Working together, saving lives

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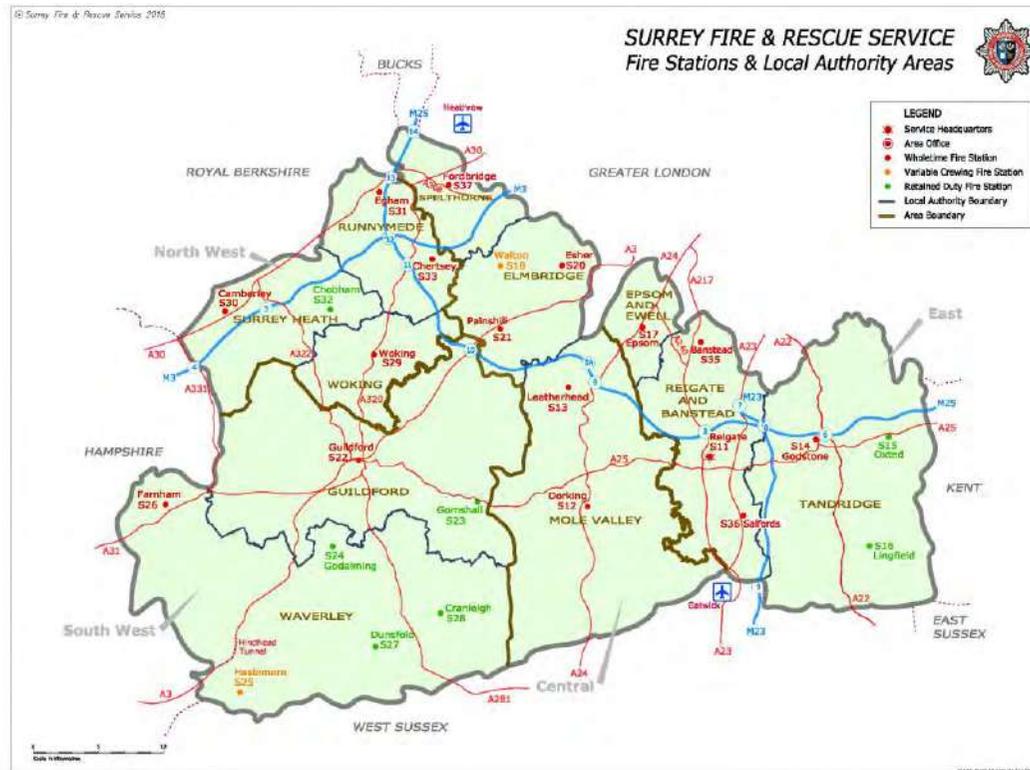
Introduction

This report provides information about different types of incidents and risks that Surrey Fire and Rescue Service (SFRS) responds to, so that we can better understand how to address these issues. This analysis is based on the most recent data.

This report helps us to identify the biggest risks for our incident types and other factors such as who is the most vulnerable. It also provides information about national threats and risks that could affect Surrey.

This document is a key part of our Integrated Risk Management Plan, and means that the Service can follow an evidence-led approach to managing the resources we have alongside the incidents we encounter.

This map shows the location of our fire stations across Surrey, and shows the counties that border us.



By looking at risk in our communities, we can assess the likelihood of an emergency incident occurring in a given area and what impact that could have on the community. By understanding these risks, we can make better decisions and plan for how to use our resources to reduce the occurrence and impact of incidents across Surrey.

Understanding the risks of incidents happening in Surrey helps us to make the right decisions on our operational response to the emergency, our prevention activities and our planning for major disasters.

Risks associated with population characteristics

A number of factors affect the risks to the population, and impact on the way we try and prevent incidents occurring and the strategies we put into place to respond. We are committed to reducing fire deaths, and between 2016 and 2018 there have been no deaths from fire in Surrey. We have dedicated fire investigation officers working to identify and tackle the causes of fire.

Deaths from fire

Between April 2006 and March 2018, there were 62 deaths as a result from fire, with 44 of those being caused by accidental dwelling fires. The main cause of the accidental dwelling fires were: smoking materials, ignition by naked flame, gas or electrical heaters being too close to combustible materials, candles, electric blankets. Other causes included faulty appliances and cooking. The main causes of fire deaths outside the home include: vehicle fires, common land fires, deliberate fire setting, and fires in gardens. Of the 18 people who died in fires outside the home, nine were suffering from mental health issues.

This analysis has shown us that the most vulnerable and at a greater risk of fire tend to have at least one of the following characteristics: aged over 60, living alone, suffering mobility or hearing loss issues, having mental health issues, having a disability, having alcohol or drug dependency, being a smoker.

Age

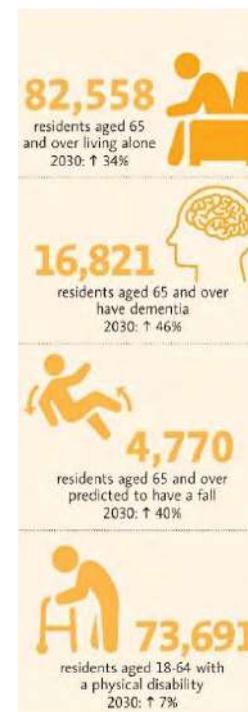
By looking at fire fatalities, we can see that the most vulnerable are older. The proportion of older people (65+) is expected to rise to 22% by 2030, from 19% in 2018.

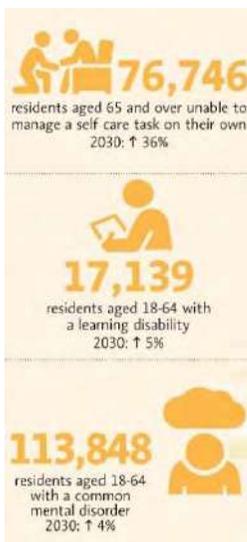
Living alone

Of the 44 people who died in accidental dwelling fires in Surrey between April 2006 and March 2018, 33 were people who lived alone. The predicted rise in single person households (increasing 34% for those aged 65 and over from 82,558 in 2018 to 110,628 in 2030) presents further challenges, given this evidence that those who live alone are more at risk of fire.

Mental health

As explained above, mental health is a contributory factor to fire deaths. Furthermore, dementia is an increasingly prevalent condition, and one that is expected to rise. The number of people aged 65 and over with [dementia in Surrey is predicted to rise 46% between 2018 and 2030 to 24,559](#). Those with dementia may be





more at risk of accidental fires and may be less able to self-rescue or respond to smoke alarms. It is also estimated that 1 in 3 adults aged 65+ with dementia remain undiagnosed. For younger residents, the number with a common mental disorder is forecast to rise by 4% from 113,848 to 118,402.

Mobility issues

As more people are supported to live at home for longer, the risks increase for those who are vulnerable. People with mobility issues may find it harder to self-rescue and may suffer from trips, slips and falls. Residents aged 65 and over with a limiting long term illness are predicted to increase from 87,712 in 2018 to 119,288 by 2030 (an increase of 36%). Likewise those unable to manage a self-care task on their own increases by a similar proportion from 76,746 to 104,375, and those vulnerable to having a fall increasing by 40% from 4,770 to 6,678.

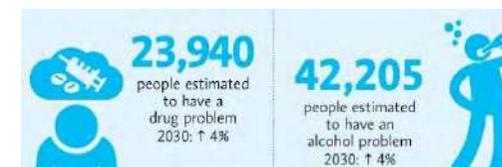
For younger residents, those with a physical disability is forecast to increase from 73,691 in 2018 to 78,849 (7%).

Learning disabilities and Autistic Spectrum Disorders

For those aged 18 to 64, the numbers of people with either learning disabilities (17,139 to 17,996) or an Autistic Spectrum Disorder (7,015 to 7,366) are predicted to increase by 5% between 2018 and 2030.

Dependencies and smoking

Those who consume high levels of alcohol can be at increased risk of fire, for example if they are cooking or smoking. Consuming alcohol can make people fall asleep and be less aware of dangers such as smoke or fire. The number of people predicted to have an alcohol problem by 2030 increases from 42,205 in 2018 to 43,893 (4%). Similarly those with a drug problem a forecast to have a 4% increase from 23,940 to 24,898.



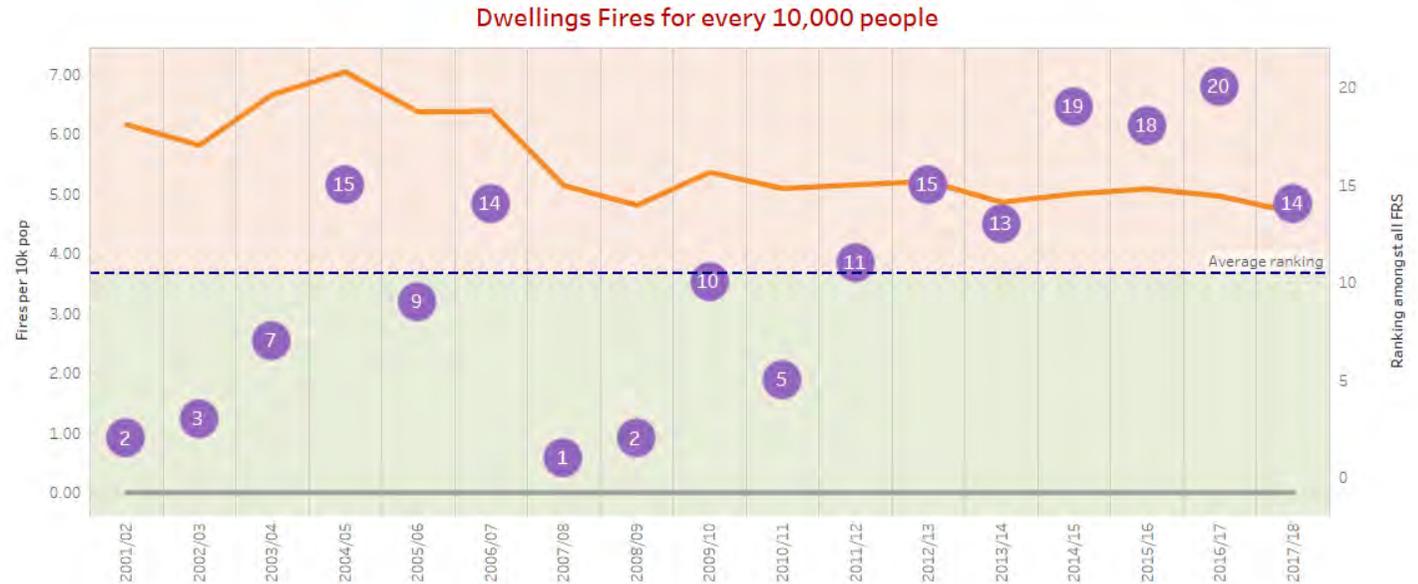
Residential property

There are also risks to residents due to the type of property they live in. Housing continues to be built across Surrey, both in rural areas and in town centres. High rise dwellings present different risks that we plan for and part of this is running exercises to test the response needed. To ensure we can access high rise buildings, we have a 42m (10 storeys high) Aerial Ladder Platform, among the tallest in the country, along with a Turntable Ladder.

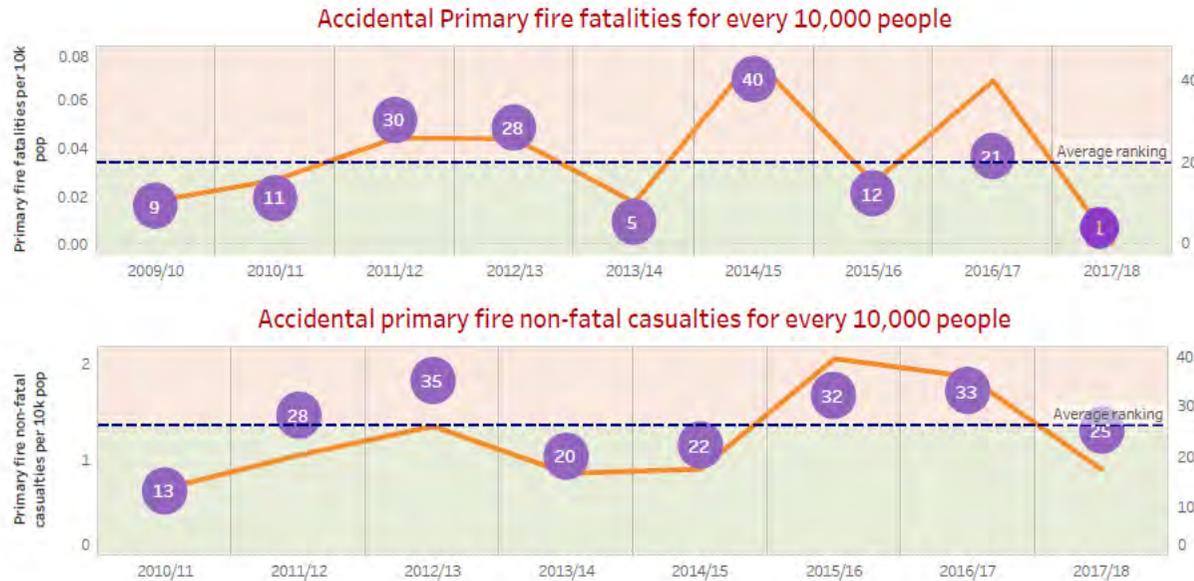
Comparative incident data – Risks associated with population characteristics

The orange line in this chart shows the number of house fires in Surrey over the last 17 years, when it broken down for every 10,000 people in Surrey. This shows that over that time period it has ranged between 5 and 7 house fires for every 10,000 people each year, and since 2007/08 it has remained at around 5.

The purple circles show Surrey's ranking position against other parts of England for the occurrence of house fires, where '1' represents the place having the lowest occurrence for every 10,000 people. The ranking is out of 45. This shows that Surrey has consistently been in the lower half of rankings for house fires, which suggests a relatively low risk compared to the average for England. Over the last six years the Surrey's ranking position has tended to increase which suggests that the decrease in such incidents over



that period did not keep pace with the decline in the overall England average.

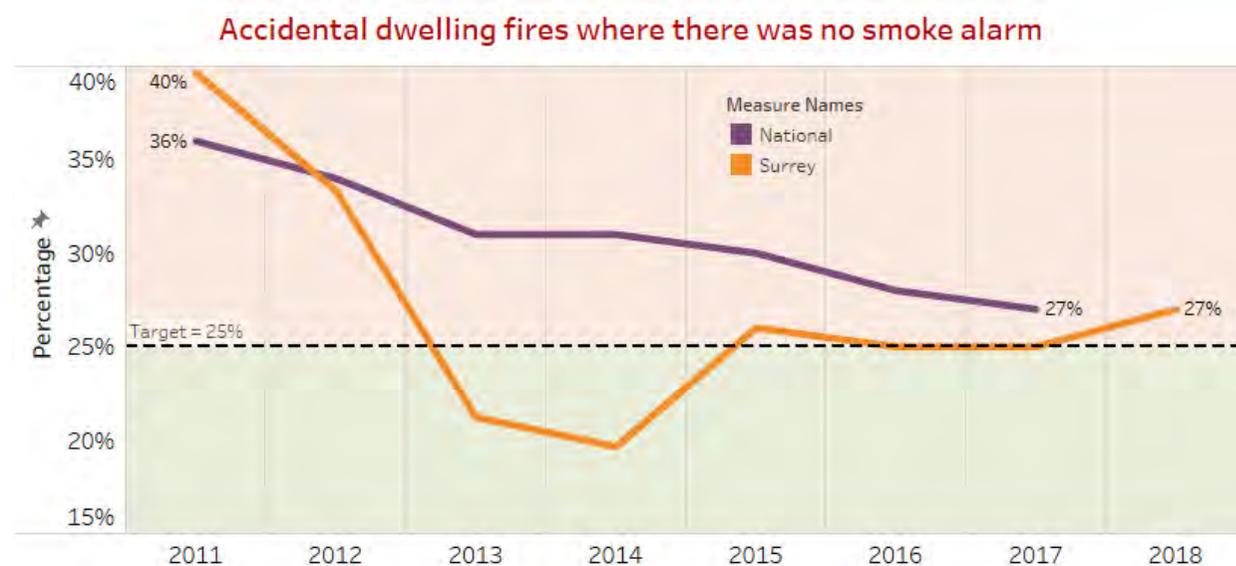


The national data does not allow for direct comparison for casualties from house fires, but we can compare against accidental primary fires, the large proportion of which will be house fires. From the first chart above, we can see that deaths from accidental fires, is extremely low for every 10,000 people. In fact you have to look at the number for every million people before you get a whole figure. For every million people over the last nine years it has ranged between 8 deaths and most recently zero. Because the numbers are small the ranking of Surrey compared to other parts of England tends to be volatile from year to year. So in 2014/15 we had a high ranking as a result of 8 fire deaths, and in 2017/18 we had the lowest ranking in England because of zero fire deaths. The average ranking is 20th. Non-fatal accidental fire injuries, have tended to be around 1 to 2 for every 10,000 people over the last nine years. Surrey's average ranking is 26th.

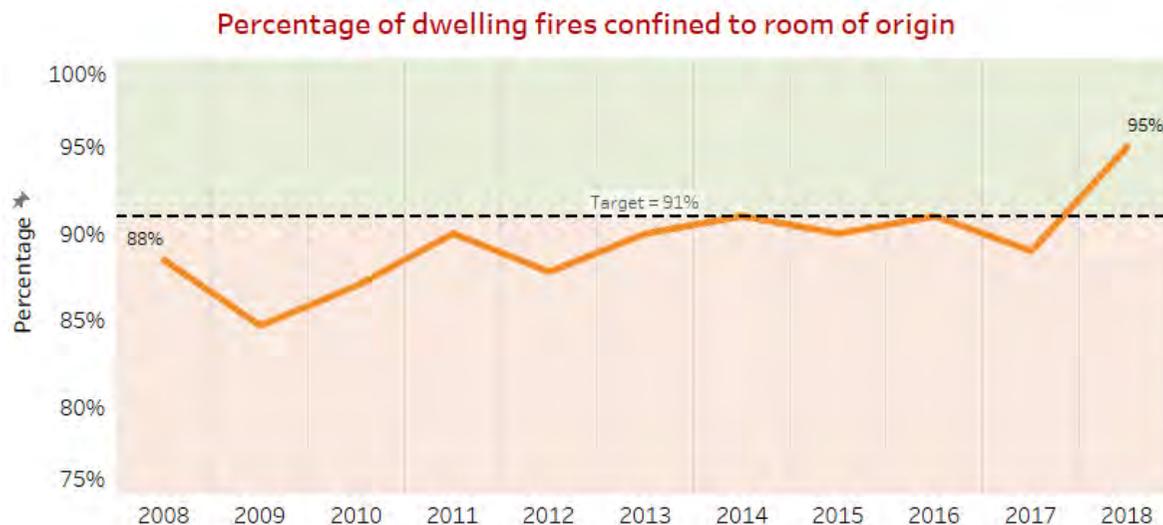
Another way to consider the risk from accidental dwelling fires is to look at those premises experiencing a fire that was found to be without a smoke alarm which otherwise would have given warning, and reduced the risk of casualties.

This chart shows that over the last eight years, between 3 out of 10 and 4 out of 10 accidental house fires have been found to be without a smoke alarm. This compares with a similar trend at national level.

For 2018/19 the Service has set itself a target of no more than 25% of accidental house fires having no smoke alarm. By the end of September 2018 the actual rate was 26%.



We can also look at house fires confined to the room of origin, as an indication of how quickly a fire has been effectively tackled by the Service.



There is no comparative information available for this, but we can see a trend for Surrey over the last eleven years. On average nine out of ten house fires are tackled in such a way that it is confined to the room of origin.

At the end of September 2018 it was a similar picture with 88% of fires since April 2018 being confined to the room of origin. This is against a target of no more than 91%.

How we use risk in our service plans and strategies: Risks associated with population characteristics

Population characteristics associated with the risk of a house fire, can be broken down into two main parts:

- The characteristics associated with a house fire occurring in the first place.
- The characteristics associated with the safe escape from a house fire.

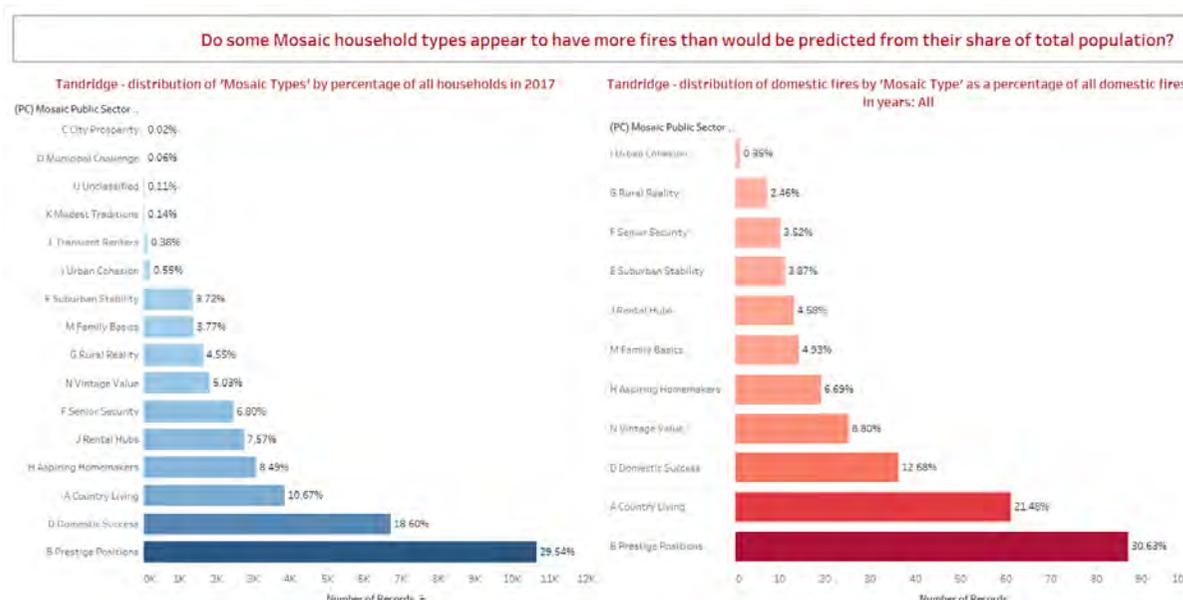
In terms of targeting those people who may be less able to safely escape uninjured should a house fire occur, it is the elderly and/or those with some form of mobility impairment who might be classified as the most vulnerable. The Service offers to visit people's homes as part of a "Safe and Well Visit" to assess what general hazards their might be in the living space and within that there will be advice about minimising the risk of a fire occurring, or if it does occur the practices that will help to slow its spread (such as closing doors at night) or facilitate a safe exit. To this end the Service regularly gathers information about some characteristics of the local population, such as the addresses of those who are 65 and older, and those who are known to be users of oxygen for health purposes. Firefighters will then give a priority to approaching those householders to see if they would like to receive a Safe and Well Visit.

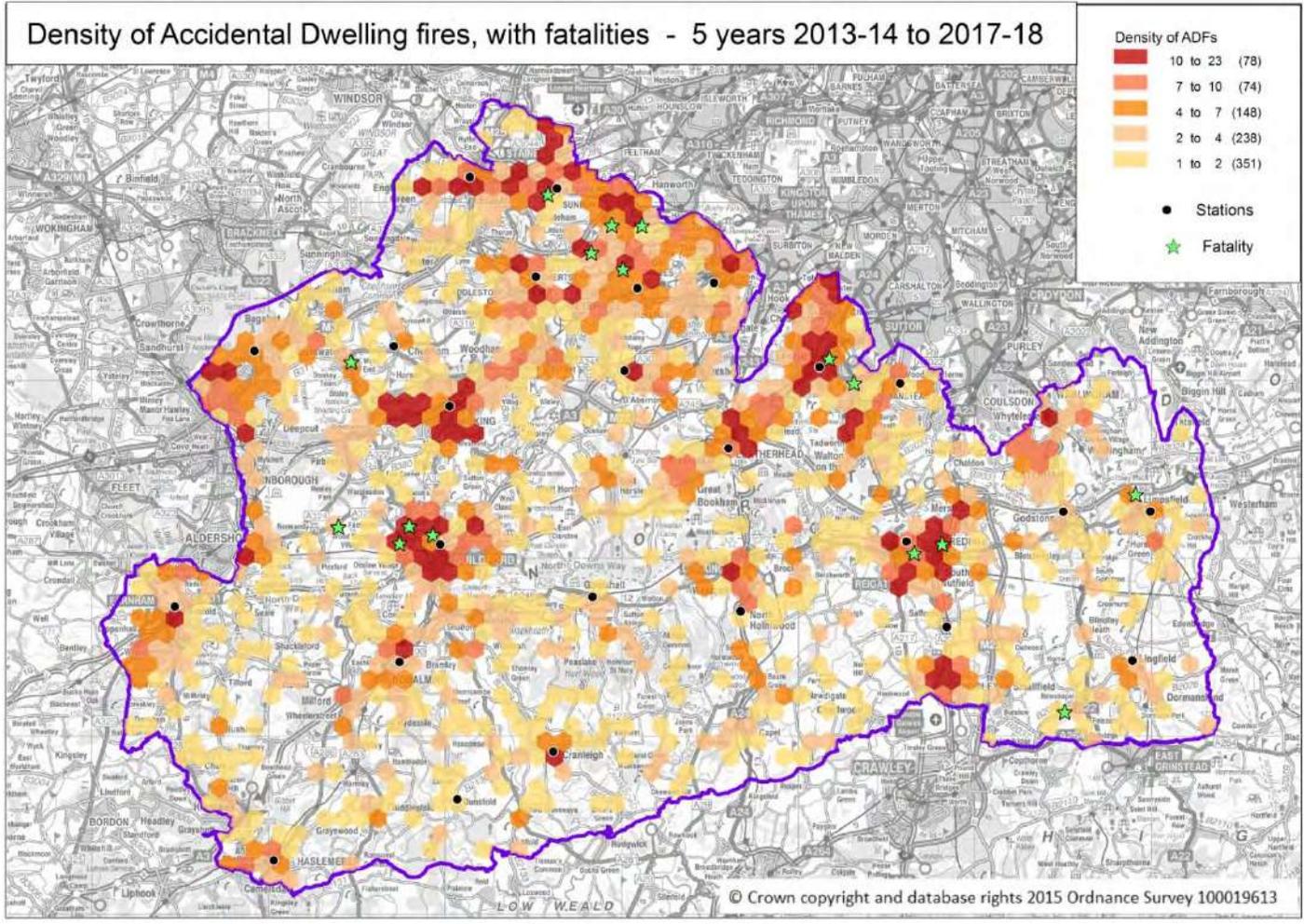
In relation to those in the population who may be more at risk of a fire occurring in the first place, the Service routinely offers a Safe and Well Visit to those who have just experienced some form of house fire.

In addition to this the Service also has access to a set of commercially available data that has classified each household in the UK as one of 15 groups, and within that it is broken down to a further level that make up 66 detailed types in all. These classifications are based on demographic data and behavioural trends. Taking the 15 main groups we can see what share of the population they make up in Surrey as a whole, and also district by district. We can then compare these against the shares of home fires that each of the 15 groups has experienced.

If this comparison shows that a group is experiencing more home fires than would be anticipated from its share of the population, this may be a group to proactively target for Safe and Well Visits. We are still in the early stages of utilising this data. In addition all frontline staff have resources available to them through the fire safety toolbox for example; referral processes for vulnerable people or guidance on understanding and interacting with people with dementia.

In the example to the right, we can see that whilst “A. Country Living” as a household type makes up about 11% of the Tandridge population, in terms of the share of home fires over the last nine years, this household type has experienced 21%, suggesting it may be worth a closer look in terms of Safe and Well Visits.





This map shows where the most and least number of accidental dwelling fires have occurred from 1 April 2013 to 31 March 2018. The most intense activity (darkest red) occurs around the highest concentrations of population.

Surrey Fire and Rescue Service relevant strategies and plans

- [Community & Business Strategy](#)
- [Mobilising & Response Strategy](#)
- [Firewise Scheme](#)

Risks associated with the built environment

Our Business Fire Safety Team are responsible for the regulation and enforcement of fire safety legislation in non-domestic premises. We carry out inspections of commercial and industrial premises and prioritise these by risk. We give fire safety advice to local businesses to help them comply with legislation and keep their employees and the public safe.

There are some industrial risks within Surrey, which is mainly from small-scale manufacturing and processes, including: Walton Aviation Terminal, fuel farms near to the border, hospitals and drugs transport, and laboratories for chemical testing, animal health and food research.

Heritage

Surrey has many listed buildings, which require coordinated planning to prevent fires occurring and to mitigate the effects if they do. We do this by inspecting properties and producing maps for heritage buildings and structures. The data and maps that we produce is then made available to our crews, through Mobile Data Terminals on every fire engine. The fire at Clandon Park House in 2015 illustrates our response to heritage incidents. The fire spread very rapidly due to the design of the building. However, there was a well-rehearsed salvage plan and our crews supported the National Trust in saving over 400 items.

[Heritage Strategy](#)



Risks associated with the built environment – incident and comparative data

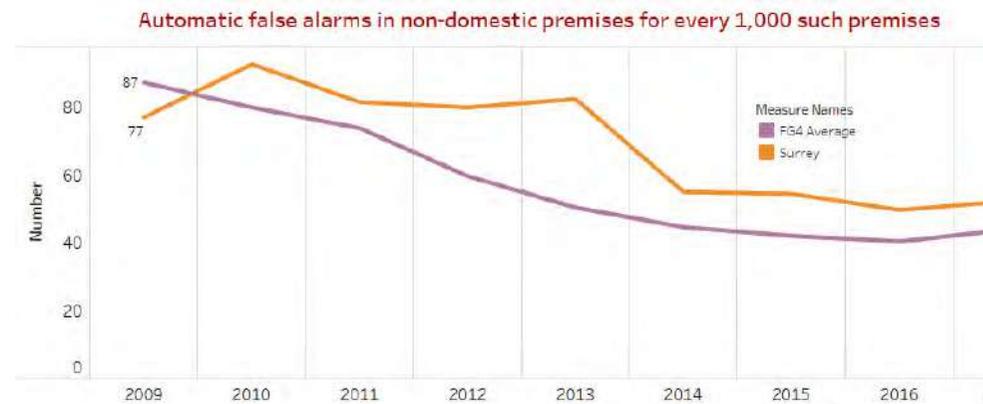


The orange line in this chart shows the number of fires in non-domestic buildings in Surrey over the last 9 years, when it broken down for every 10,000 people in Surrey. This shows that over that time period it has ranged between 2 and 3 such fires for every 10,000 people each year.

The purple circles show Surrey’s ranking position against other parts of England for the occurrence of non-domestic building fires, where ‘1’ represents the place having the lowest occurrence for every 10,000 people. The ranking is out of 45. This shows that Surrey has consistently been in the lower half of rankings for non-domestic building fires, which suggests a relatively low risk compared to the average for England. Over the last six years the Surrey’s ranking position has tended to increase which suggests that the decrease in such incidents over that period

The greater proportion of attendances by the Service to non-domestic buildings is actually in response to an automatically generated false alarm (89%). This chart shows the volume of such false alarms for every 1,000 non-domestic premises – the blue line showing Surrey and the orange showing the average of a group of 20+ other Fire and Rescue Services with similar characteristics. This shows that Surrey is tending to attend slightly above the average number of automatic false alarms. With the aim of helping to improve efficient use of resources in this area the Service is implementing a new policy around how such incidents are handled. When the Service receives an AFA call from a commercial premises, or any other premises categorised as ‘in scope’, the Service does not make an automatic emergency attendance unless there is a confirmed fire or a perceived presence of fire reported from the premises, such as a smell of smoke or burning, etc. This applies any time of day or day of the week. The Service continues to provide an emergency attendance if a person is concerned that there may be a fire cannot investigate the premises or is unable to provide sufficient detail to allow the attendance to be sent in a non-emergency manner.

did not keep pace with the decline in the overall England average.



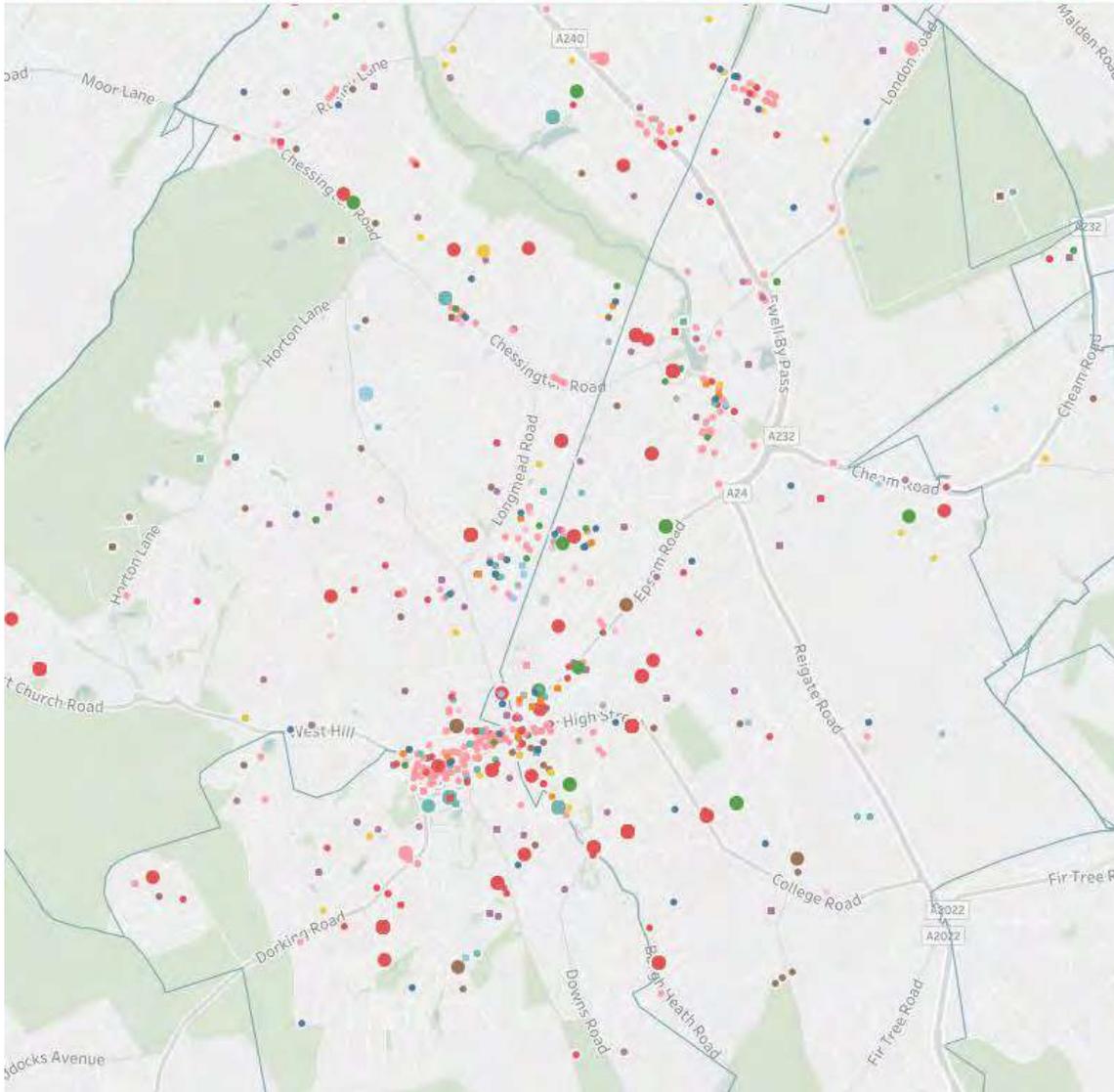
Risks associated with the built environment – how we use risk in our service plans and strategies

The Service maintains a database of information about business premises. This will include a record of the type of business being carried out, any unusual hazards at the site and an assessment of the risk rating posed by the premises. The level of risk of a premises will determine how frequently a premises is re-assessed. Service visits to a premises will generally be for one of two purposes:

- Business Safety Audit – to check on compliance with applicable fire safety regulations. Where a failure to comply is found an enforcement notice will be issued along with a follow up procedure.
- Premises Survey – to assess a premises from the perspective of firefighter safety in the event of an incident occurring. The first visit will be an initial survey and for those premises deemed to have above a certain level of risk, this will be followed by an operational survey.

In addition to this the Service also has access to a set of commercially available data that has classified each premises with a risk score ranging between 1 and 100. The score combines and number of considerations around premises type, the sector the business operates within, number of employees, whether there is a high volume of stock held on site and the use of cooking equipment on site. After analysing ten years of data a strong correlation was found between these factors and the occurrence of accidental fires. In fact 80% of such fires are found to occur within 20% of the riskiest premises.

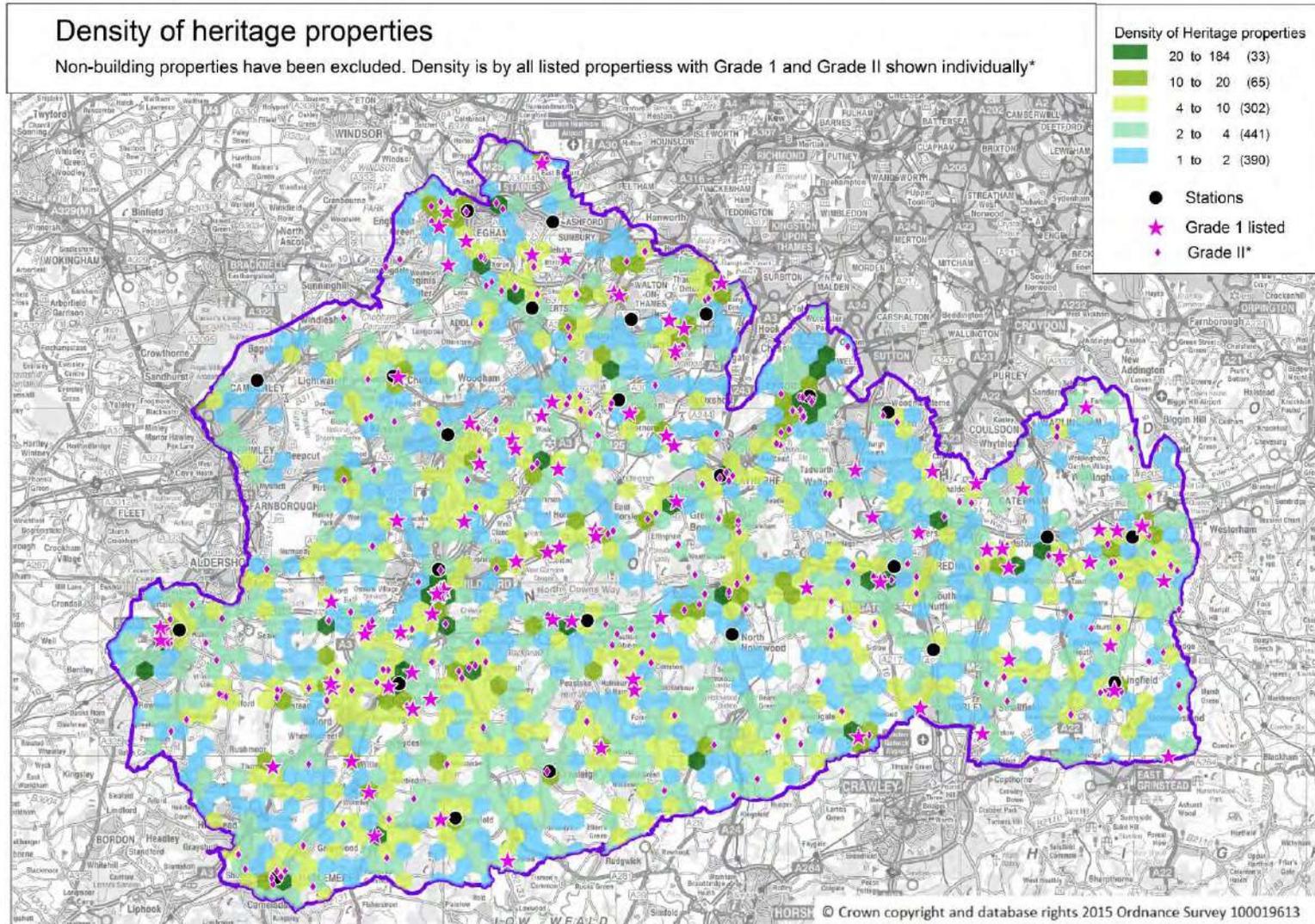
Commercial premises within Epsom and Ewell with a risk rating between 80 to 99



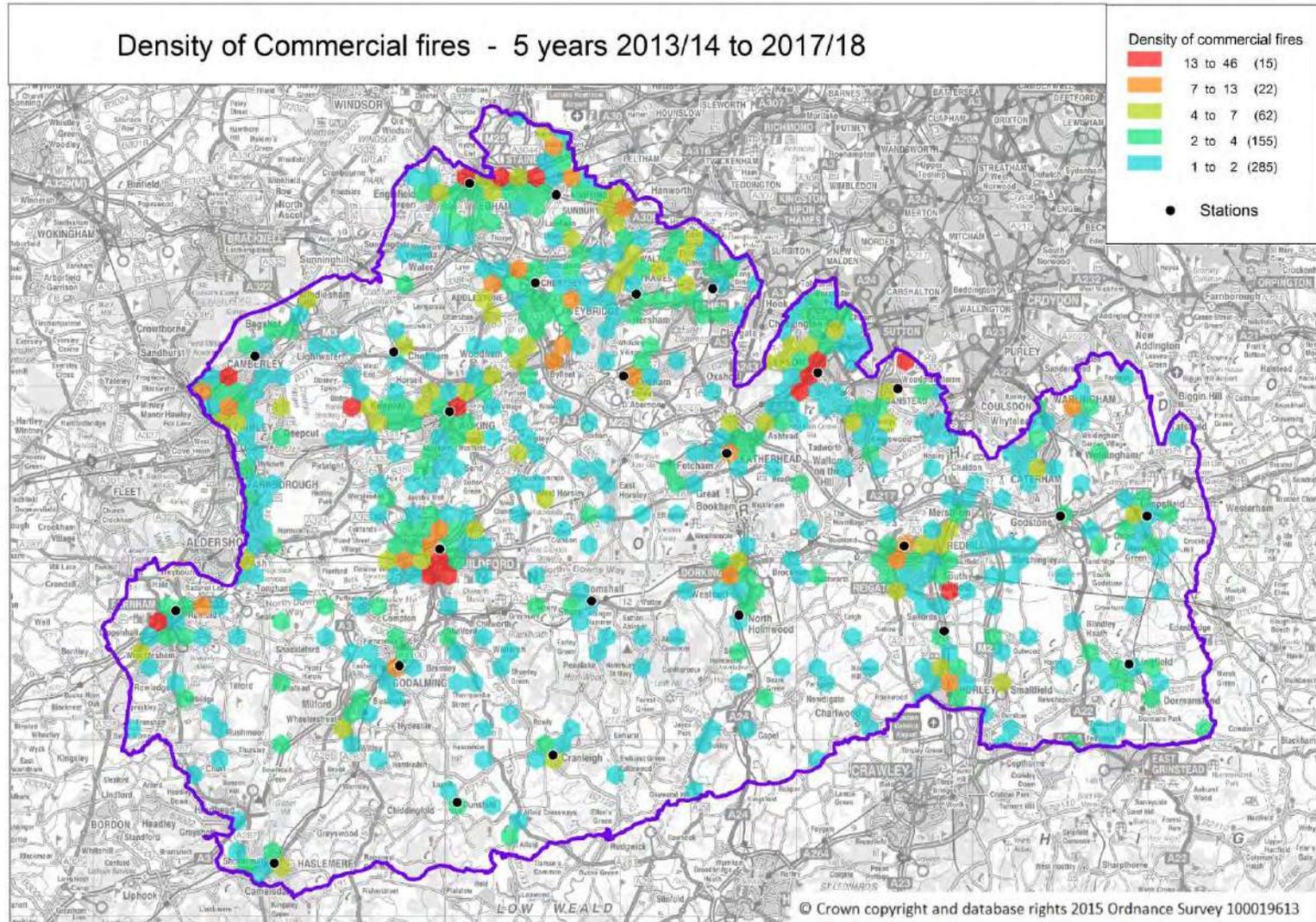
The Service has plotted this data on a map with a view to using this information to help target those business premises most in need of fire safety audits and surveys.

The colours represent different categories of business premises, and the larger circles are those that include a sleeping risk, such as commercial accommodation. This particular map shows those premises that fall within the highest 20% of risk ranking in one particular Borough (for illustrative purposes only).

This map shows the distribution and locations of Grade I and Grade II listed heritage sites. The most noticeable thing is the relatively even spread across all parts of the County.



This map shows where the most and least number of commercial fires have occurred from 1 April 2013 to 31 March 2018. The most intense activity (light red) occurs around the highest concentrations of population.



Surrey Fire and Rescue Service relevant strategies and plans

- [Community & Business Strategy](#)
- [Mobilising & Response Strategy](#)

Risks associated with the transport infrastructure

Road safety

Surrey has around 3,452 miles of roads, with the majority being minor or A and B roads, however the county does have 63.3 miles of motorways. Our roads carry almost double the national average amount of traffic.

The number of Road Traffic Collisions (RTCs) that we have been called to has been reducing in the last few years.

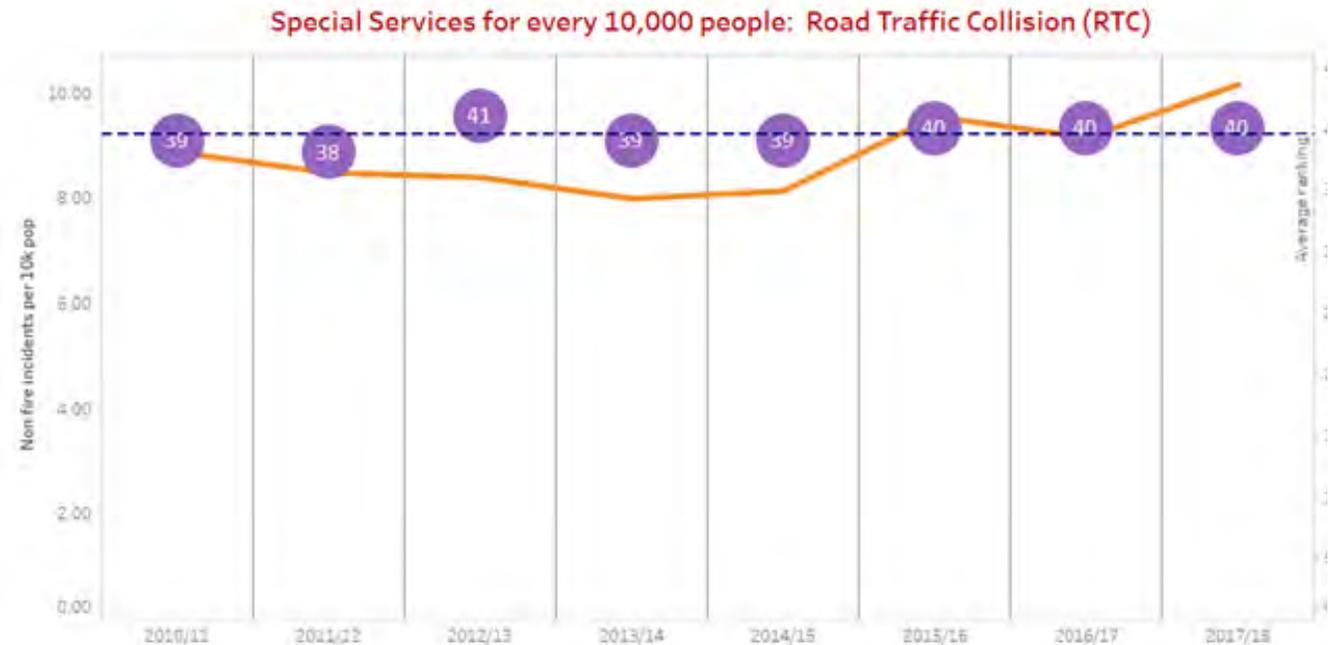
Another area that the Service is keeping under review is the plans for third runway at Heathrow airport. This is likely to increase air traffic movements and also traffic on the road network. A further unique road network risk for Surrey is the Hindhead Tunnel which is the UK's longest underground tunnel. Exercises and plans for evacuation are tested at Hindhead with our emergency service colleagues from Surrey and from over the border.

Rail network incidents are rare, but can have severe effects. To help familiarise crews with this potential risk, we engage in exercises with partner agencies to ensure that we can respond appropriately if required.

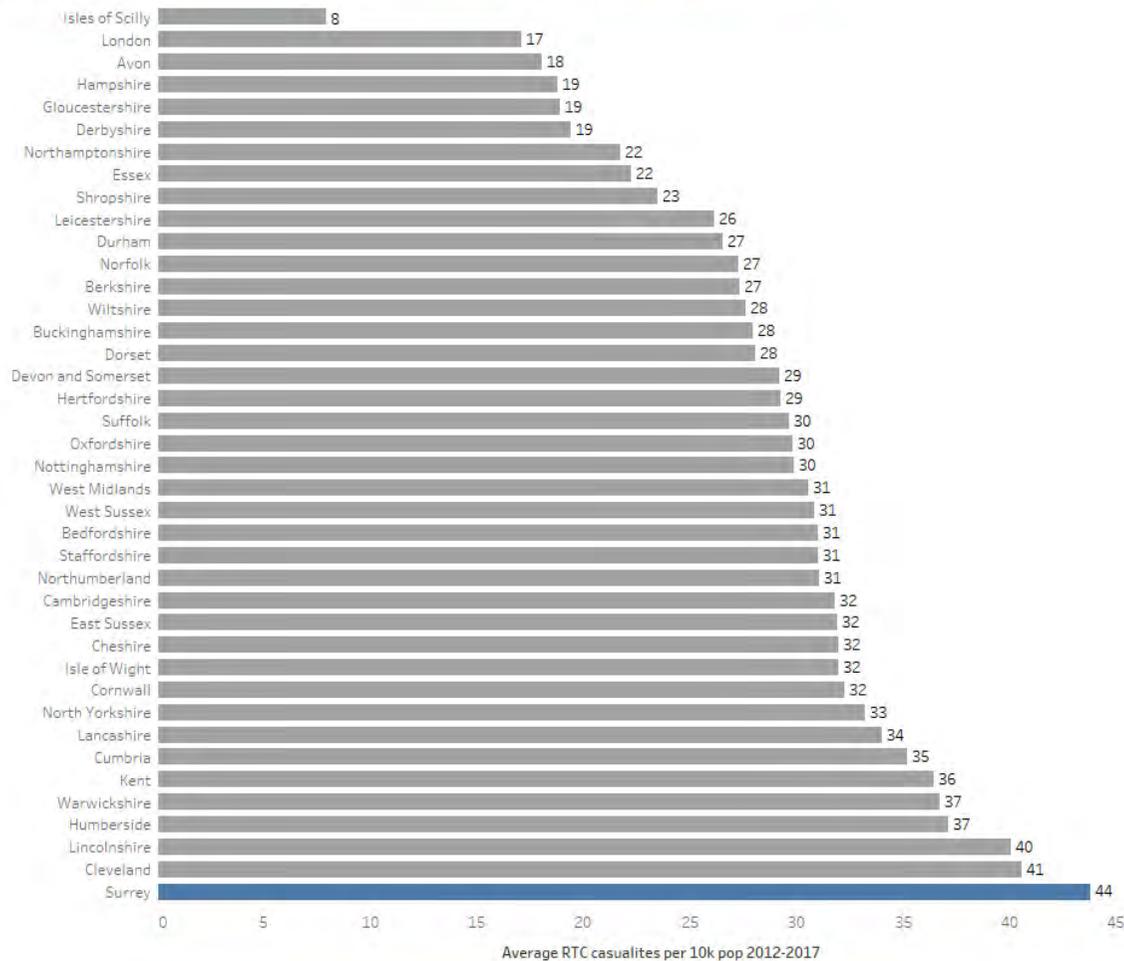
Surrey has a number of small airfields within its borders, and has Heathrow, Gatwick and Farnborough airports sitting just outside. For this reason we prepare for any aircraft-related incidents, such as attending emergencies at airports, and being aware of and trying to control smoke from incidents affecting the flightpaths.

Risks associated with the transport infrastructure – incident and comparative data

The orange line in this chart shows the number of road traffic collisions (RTCs) attended by the Service over the last eight years, when it broken down for every 10,000 people in Surrey. This shows that over that time period it has ranged between 8 and 10 such collisions for every 10,000 people each year. The purple circles show Surrey's ranking position against other parts of England for the occurrence of attendances at RTCs, where '1' represents the place having the lowest occurrence for every 10,000 people. The ranking is mostly out of 40 Fire and Rescue Services and in some years 41. This shows that Surrey has consistently been near the higher end of RTCs in the rankings, which suggests a relatively high risk compared to the average for England.



**Average road traffic collision casualties each year for every 10,000 people
2012 to 2017**



The relative risk of Surrey’s roads compared to the rest of England shows even more starkly when looking at the average number of road casualties between 2012 and 2017. The average for Surrey over this period is 44 casualties for every 10,000 people. So in terms of relative risk in Surrey this is significantly higher than casualties from accidental fires. Also as can be seen Surrey has the highest average for all English local authority areas.

In 2017 when comparing millions of motor vehicle miles travelled across county and unitary authorities, Surrey had the fourth highest volume.

Government research on fatal road injuries has made the following key conclusions:

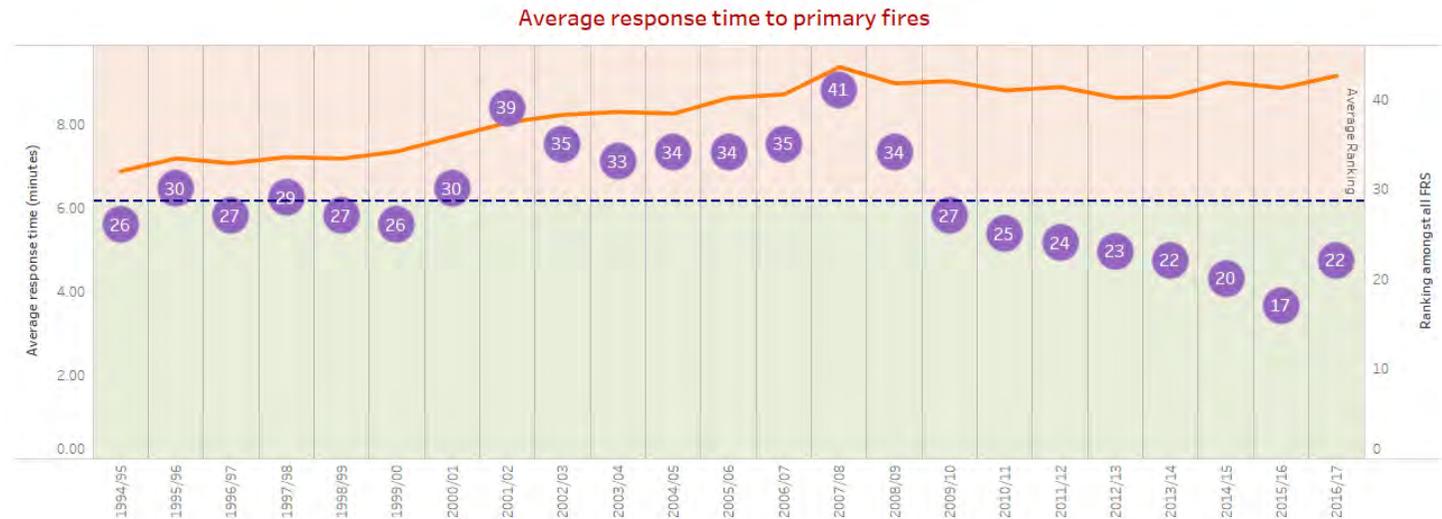
- Over 65 per cent of the accidents examined involved driving at excessive speed, a driver in excess of the legal limit of alcohol intake, the failure to wear a seatbelt or some combination of these
- The majority of accidents involving young drivers occur because of loss of control.
- Alcohol and dangerous driving are major contributory factors
- Older drivers had fewer accidents but fatalities involving them tended to

involve misjudgement and perceptual errors in “right of way” collisions.

The relative volume of traffic on Surrey’s road network is also likely to impact on travel times in general for the Fire & Rescue vehicles travelling to incidents.

This chart shows the average response time in Surrey over the last 23 years to primary fires in particular. In 1994/95 it was 6 minutes and 52 seconds. In 2016/17 it was 9 minutes and 9 seconds. Over that same period of time motor vehicle miles travelled on the road had increased by 17%.

The purple circles show that over the last eight years, Surrey’s ranking has tended to improve and be in the lower two thirds of the table when compared to others in England. So whilst the travel time is tending to increase it is part of a nationwide trend.



Risks associated with the transport infrastructure – how we use risk in our service plans and strategies

All frontline appliances are equipped with state of the art cutting and extraction technology to keep up with new safety systems which are incorporated in modern vehicles to support quick extraction where intervention is required. Furthermore, we ensure that all our staff are aware of the legal obligations when responding to emergency and other incidents on our roads, as there is a risk to the public and to our staff when we have to respond as an emergency.

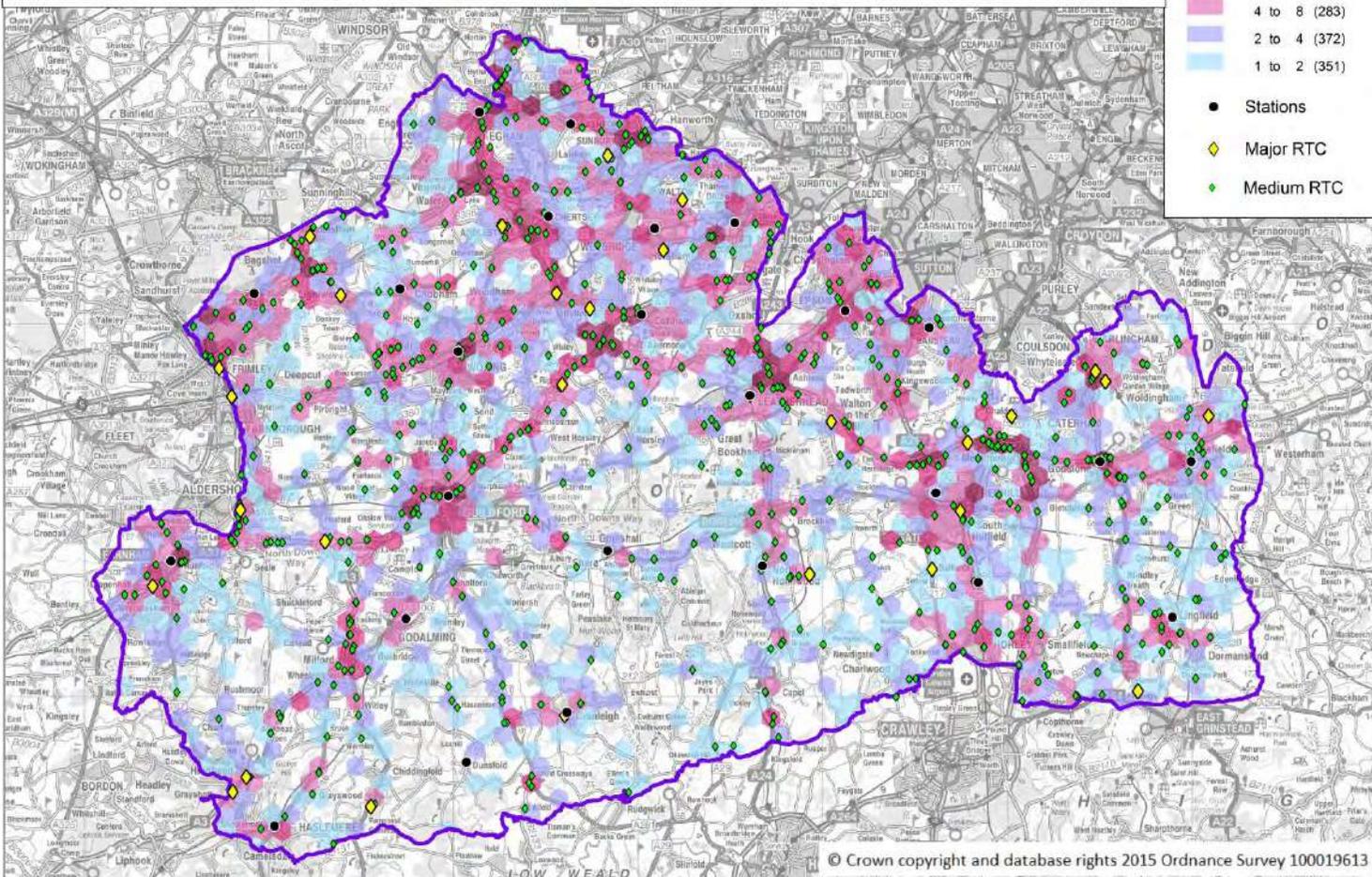
Our aim is to educate and engage with the residents of Surrey to drive down the risk of harm to people. We will look to provide advice through events, one to one contact, literature, and through our external website. As part of our focus we will run appropriate courses or appropriate engagement for specific areas such as road safety, youth engagement, schools education and directly to vulnerable people where required.

Safe Drive Stay Alive

One of the ways that we engage with young people to highlight the risks of dangerous or careless driving is through our 'Safe Drive Stay Alive' performances. This theatre-based education production which the Service has been putting on since 2005, aims to raise road safety awareness among young people, and to positively influence their attitudes to driving. It uses a combination of videos and real-life experiences from people affected by RTCs, to make young people aware of the consequences of not taking responsibility when on the road. In 2018, around 13,500 young people attended a performance of Safe Drive Stay Alive.

Density of RTC incidents showing major and medium RTCs - 5 years 2013/14 to 2017-18

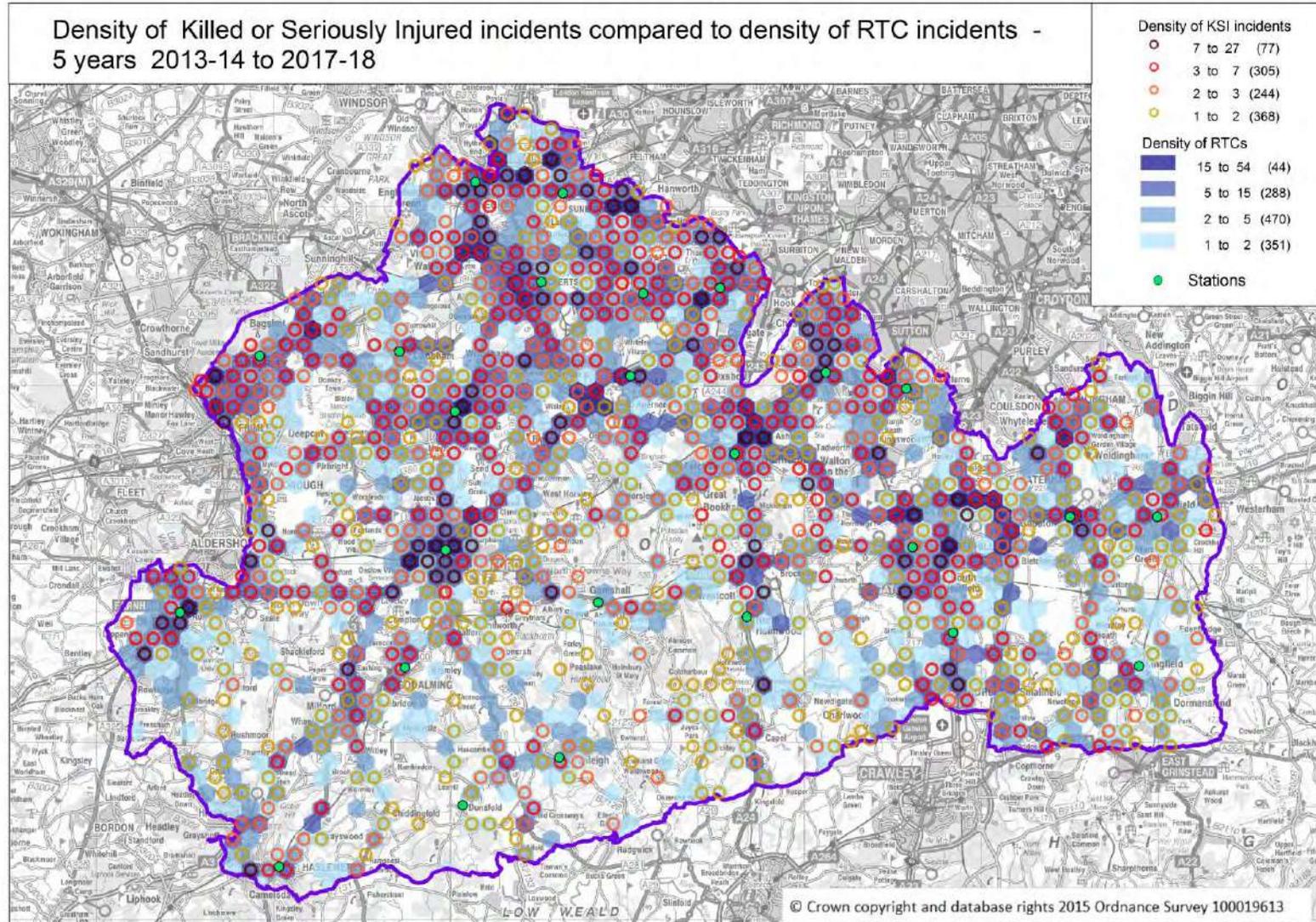
Major RTCs are classed as those where more than 1 extrication was performed, medium ones where 1 extrication was performed



This map shows where the most and least number of major and medium road traffic collisions have occurred from 1 April 2013 to 31 March 2018. The most intense activity (dark red) occurs around the M roads and A roads.

This map shows both the occurrence of road traffic collisions where people were killed or seriously injured alongside the occurrence of all road traffic collisions attended by the Service. This is from 1 April 2013 to 31 March 2018.

Density of Killed or Seriously Injured incidents compared to density of RTC incidents - 5 years 2013-14 to 2017-18



Surrey Fire and Rescue Service relevant strategies and plans

- [Community & Business Strategy](#)
- [Mobilising & Response Strategy](#)
- [Safe Drive Stay Alive](#)

Risks associated with rivers and lakes

There are a number of rivers, lakes and reservoirs within Surrey, and most are used for transport and leisure activities. The River Thames presents additional risks due to the number of dwellings on islands within the Surrey stretch of the river. We have developed our waterborne and flood response capability to support these residents, and the wider community.

Surrey is vulnerable to both inundation of floodplains by river water, and local flooding of the drainage networks when overwhelmed by intense rain storms.



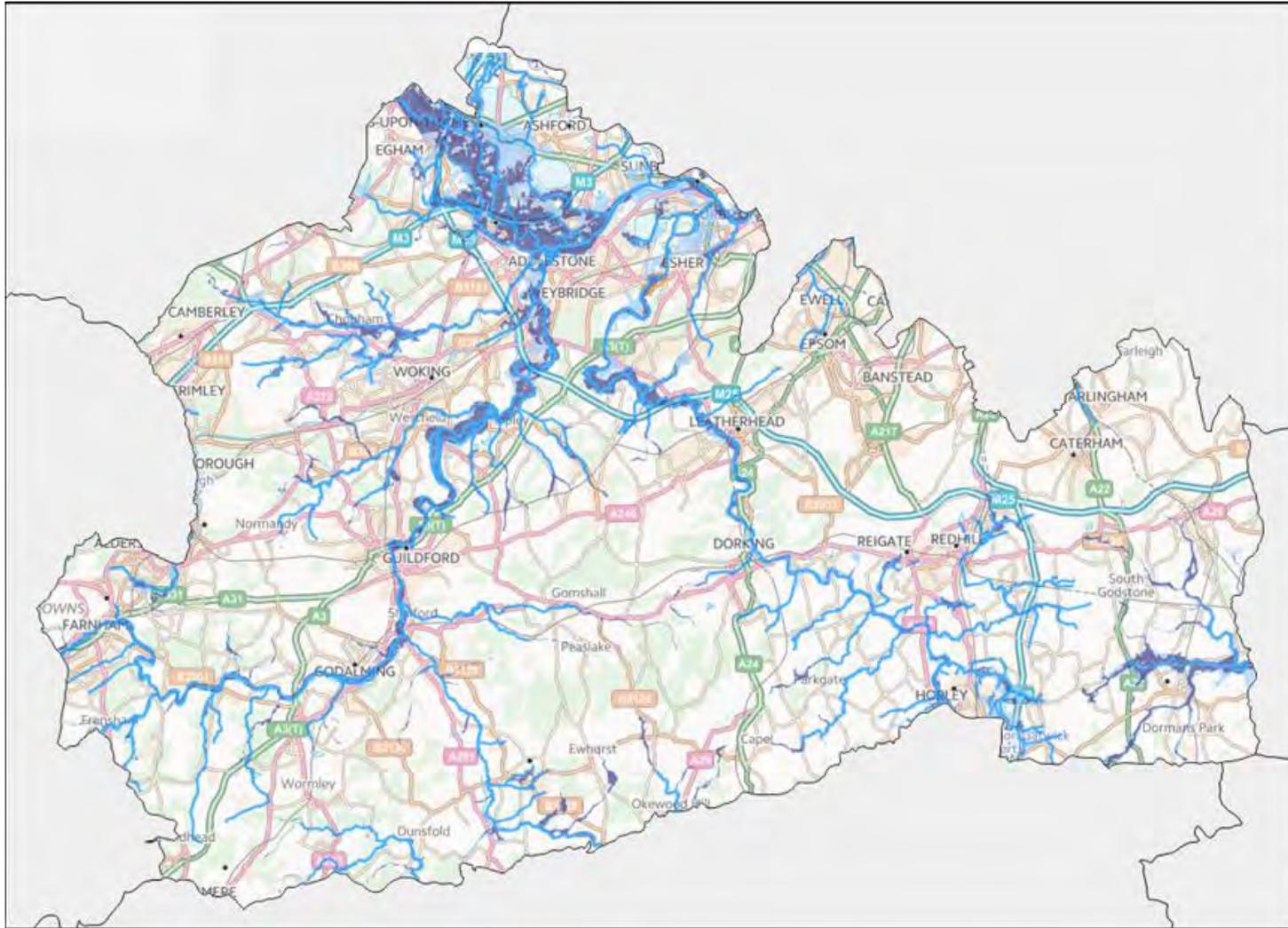
Nearly 64,000 households in Surrey are at risk of flooding, predominantly from the rivers Wey, Mole and Thames. 24,000 of these households are high risk. Previous experience of flooding in the county shows that the worst affected properties tend to be in the north of Surrey. While properties elsewhere may suffer to a lesser degree, there is still a large impact on local communities.

In 2013/14, Surrey experienced sustained flooding, leading to a sharp increase in the call outs for flooding incidents and water rescue. This was particularly felt in Elmbridge, Runnymede, Mole Valley, Spelthorne and Guildford boroughs.

Climate change may increase this risk in the future, and so in conjunction with the Local Resilience Forum, we work with local people in known flood areas, to help them prepare for flooding and make them aware of what they need to do should it occur.

Risks associated with rivers and lakes – incident and comparative data

Environment Agency Flood Map for Surrey as at 2018



This map shows the likelihood of flooding within Surrey. The highest risks “Flood zone 3” are in the darker blue, middle risks are “Flood zone 2” and lighter blue, and the areas of white are lower risk: “Flood zone 1”

Special Services for every 10,000 people: Flooding



This chart shows the incidents of flooding rescues in Surrey over the last eight years. The orange line illustrates that it has generally been around 2 or 3 flooding incidents for every 10,000 people in Surrey, although in 2013/14 which was a particularly notable year for floods that increased to 5 incidents. The purple circles show that in terms of relative position in England Surrey tends to be in the highest third of such incidents.

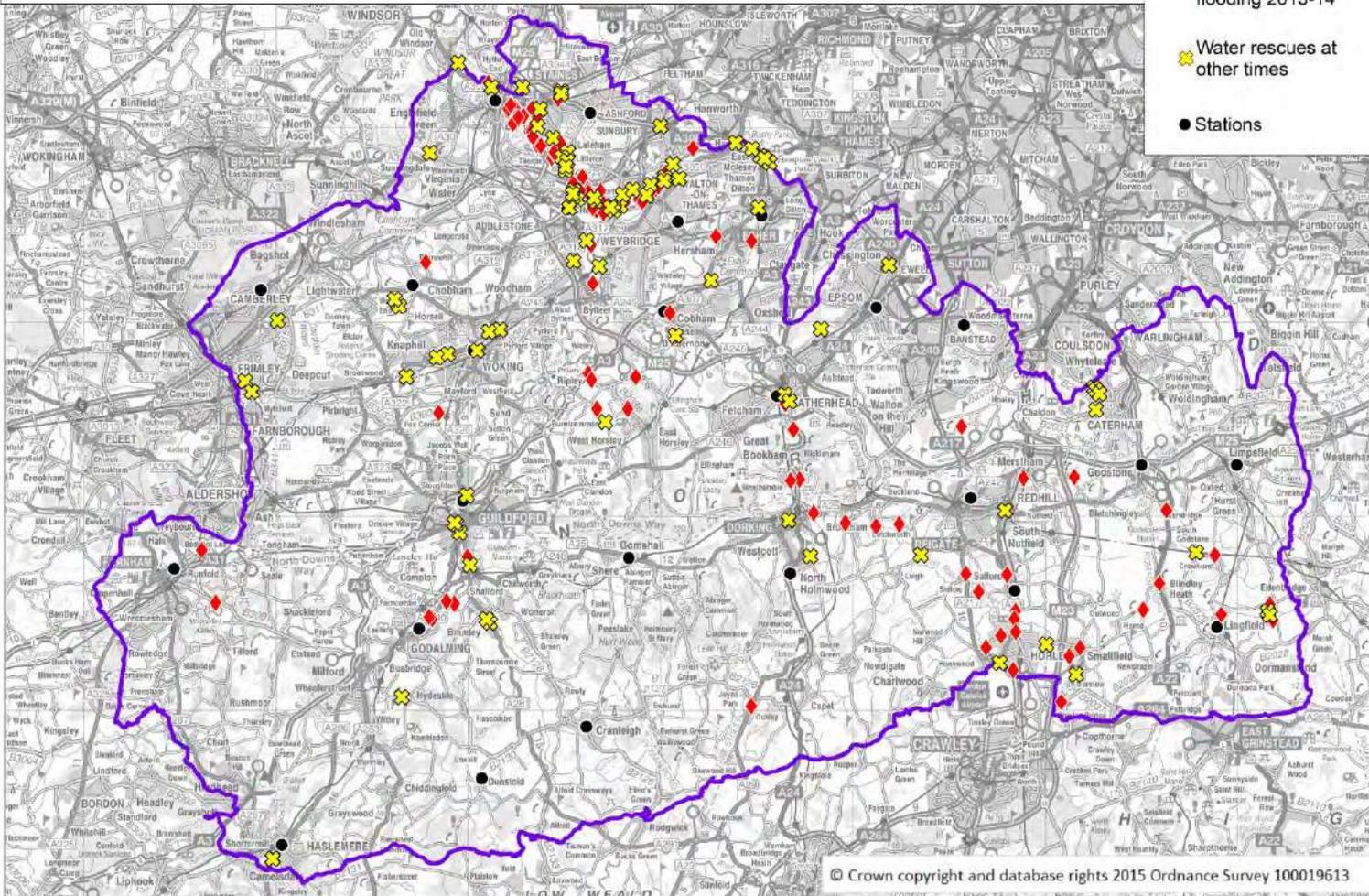
The rescue or evacuation from water trend line shows a similar pattern as might be expected but with an even more pronounced spike in 2013/14. Apart from that year the number of people rescued has been around 1 to 2 for every 100,000 people. What is different to flooding is the relative ranking, which has an average of 21st and therefore in the lower half of fire and rescue services.

Special Services for every 10,000 people: Rescue or evacuation from water



Locations of water rescues - 5 years 2013-14 to 2017-18
Showing incidents during major flooding Dec 1013-Feb 2014 and other incidents

- Water rescues
- ◆ during major flooding 2013-14
- ✕ Water rescues at other times
- Stations



Risks associated with rivers and lakes – how we use risk in our service plans and strategies

We have specialist trained staff and rescue equipment available to respond to a range of flooding and water incidents across the County. We are involved in the Respect the Water campaign to ensure that a consistent water safety message is delivered to the public including at specific school visits. We have also worked closely with Districts and Boroughs to install public throwlines and signs, and train staff at pubs and restaurant along the Thames in the use of this equipment.

Surrey Fire and Rescue Service relevant strategies and plans

- [Community & Business Strategy](#)
- [Mobilising & Response Strategy](#)

Risks associated with the environment and climate change

The Surrey countryside is a highly valued leisure and commercial space. Surrey is a densely populated county and so the demands on green spaces are high. We aim to protect green spaces from fire, to protect the plants and animals which inhabit them, alongside safeguarding the enjoyment of these areas and the safety of residents.

Wildfires

Any fire occurring in natural vegetation, consuming the natural fuels and spreading in the environment can be classified as a wildfire. Surrey's mix of natural fuels, such as pine needles, tree moss, fir trees, leaves and twigs, make it susceptible to wildfires.

Wildfires and common fires have a number of impacts. They can threaten the health and wellbeing of visitors to the land, and may damage residential and commercial properties and recreation amenities. Wildfires can also affect critical national infrastructure, like transport networks and power lines. There can be an economic impact, like losses to forestry businesses and the wood processing sector, providers of tourism and recreation and also the cost of restoring woodlands after a wildfire.

Environmentally, wildfires can cause damage to the natural and historic environment (e.g. protected sites, endangered species, and listed buildings). Wildfires also release carbon dioxide stored in vegetation and soil, which increases carbon emissions and contributes to climate change.

Common and wildfires require a large number of our resources and may affect our ability to maintain fire cover elsewhere in the county.

Climate change and extreme weather

The current international predictions for the effects of climate change indicate that temperatures will rise, with increasing levels of rainfall. Higher temperatures for prolonged periods mean that we can expect to see more outdoor fires. This will impact also on water supplies, which is something that as a Service we need to take into account in our management and fighting of fires. More



rainfall can lead to flooding, especially in communities close to rivers. Stormy weather can affect travel across the county, causing debris from fallen trees. Ice and snow can cause additional hazards on our roads.

Risks associated with the environment and climate change – incident and comparative data

Forest, heathland, agricultural, and other vegetation fires have considerable direct and indirect impacts on society, the economy, health and well-being, and may impact directly upon the transport and recreation sectors. Projected climate change highlights the urgency with which fire prevention planning for wildfires should be addressed.

Heathland and Woodland in Surrey – courtesy of the MAGIC interactive map

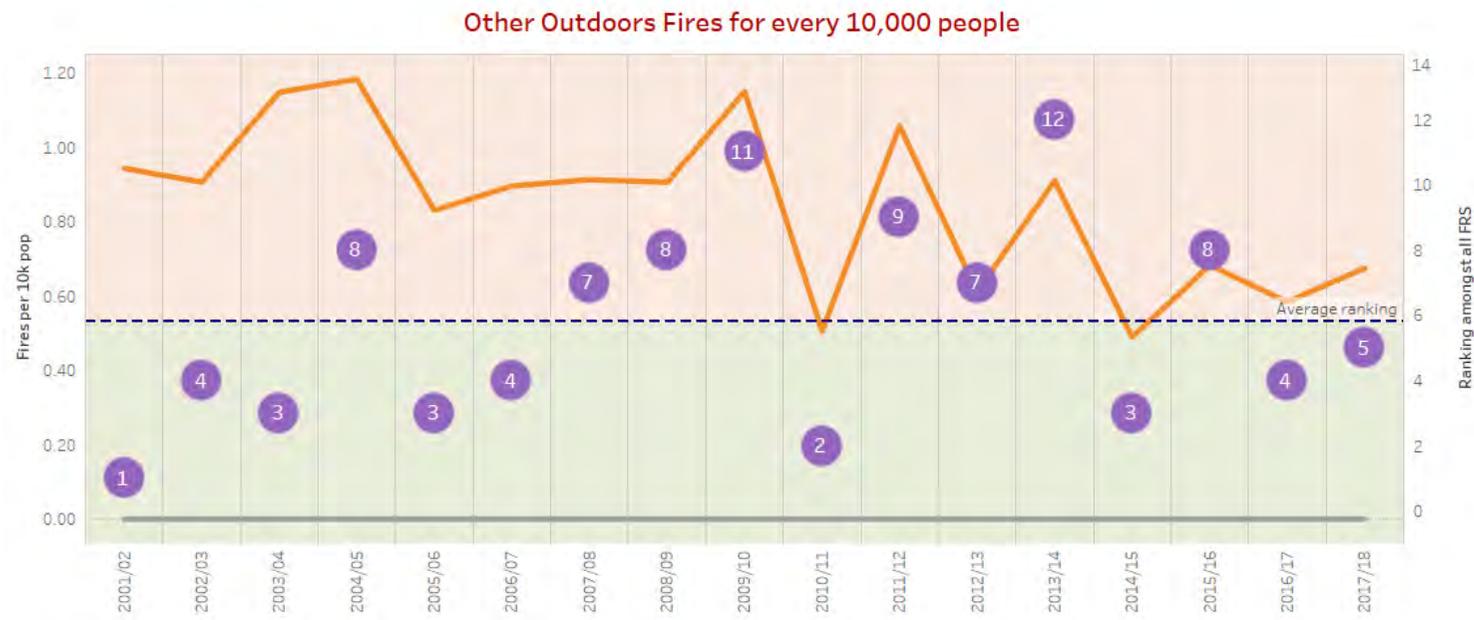


Surrey is the most wooded county in England. Waverley Borough, with nearly half of its land covered by trees, is almost as wooded as the New Forest.

Woodland covers 23% of the land area of Surrey, far more than the national average of 8.5%. However the figure for Europe is 33%.

To explore this map online in further detail please go to [this site](#).

Outdoor fires for the last 17 years have shown quite a volatile trend, but generally appears to be going downwards. Generally there has been 1 or 2 such fires for every 20,000 people in Surrey. Despite its wooded nature, Surrey's ranking position compared to others has generally fallen amongst the lowest 10.



Risks associated with the environment and climate change – how we use risk in our service plans and strategies

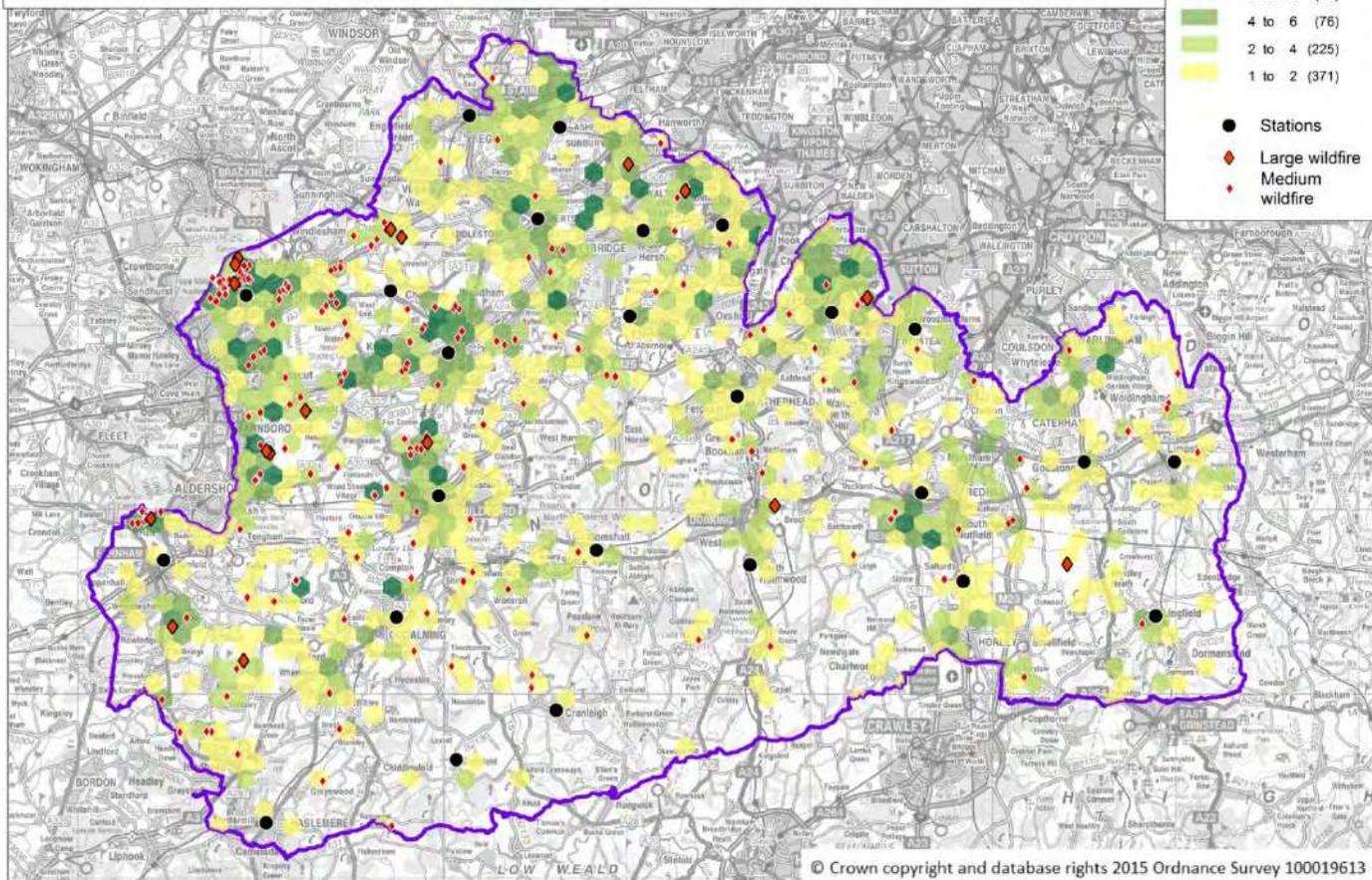
Preparing for wildfires includes maintaining specialist vehicles and specific additional training. Our focus is on prevention of wildfires and so we engage with local communities and provide education to young people through schemes such as FireWise and the Youth Engagement Scheme (YES). We engage with residents to provide information on reducing the risk of a wildfire occurring, and advice for evacuation if necessary. We have carried out inspections of areas at risk of wildfire and identified sites and premises that should be evacuated if a wildfire occurs.

The map below shows the density of wildfires in Surrey. Further work will be done by the Service to understand the different types of vegetation that succumb to wildfire and where they are in the county. This spatial representation will enable us to put clear prevention strategies in place. We will continue to develop links and work partnership with others, such as local authorities, Natural

England, Forestry Commission, Environment Agency and national parks, to deliver an effective wildfire strategy. This will include ensuring that habitats that are likely to be susceptible to wildfire have a plan in place to prevent, and respond to an incident through collaborative work with land managers. Wildfire Subject Matter Advisers are available for operational incidents and also for consultation with landowners as required.

Density of wildfires - 5 years 2013-14 to 2017/18

Large wildfires are those causing more than 10,000m² of damage, medium wildfires those causing more than 500m²



This map shows both the density of wildfires attended by the Service. This is from 1 April 2013 to 31 March 2018. It is evident from this that those categorised as 'Large wildfires' occur more frequently in the west of the County, particularly in the Borough of Surrey Heath.

Another area that the Service is looking to continue developing is understanding and mitigating the environmental impact of our operational response. This will include making use of our Environmental Protection Unit where required and ensuring that we are not leaving communities with negative environmental impacts as a result of our emergency response, for example water run-off from extinguishing fires which could cause flooding.

Fire and rescue vehicle and equipment play a key role in keeping our staff and residents safe. We want to make the best use of our resources, and have utilised Multi-Role Vehicles, designed to provide support in severe weather incidents where a fire engine cannot reach. Furthermore, we are looking at the environmental impact of vehicles throughout their production, use and when it's time to dispose of them. We are committed to operating sustainably and responsibly, assessing the carbon footprint and balancing with operational requirements, to ensure that at all times we are delivering the highest standards of public safety. We are encouraging our staff to become more aware of fuel-efficient driving, which both helps the environment and keeps our fuel costs down.

Surrey Fire and Rescue Service relevant strategies and plans

- [Community & Business Strategy](#)
- [Mobilising & Response Strategy](#)

National and regional risks

Planning for Major Incidents and Emergencies

The Civil Contingencies Act, and accompanying non-legislative measures, delivers a single framework for civil protection in the UK.

The Act and supporting Regulations and statutory guidance 'Emergency preparedness' establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. The Act divides local responders into 2 categories, imposing a different set of duties on each.

Those in Category 1 are organisations at the core of the response to most emergencies (the emergency services, local authorities, NHS bodies). Category 1 responders are subject to the full set of civil protection duties. They will be required to:

- assess the risk of emergencies occurring and use this to inform contingency planning
- put in place emergency plans
- put in place business continuity management arrangements
- put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency
- share information with other local responders to enhance co-ordination
- co-operate with other local responders to enhance co-ordination and efficiency
- provide advice and assistance to businesses and voluntary organisations about business continuity management (local authorities only)

Partners involved in the emergency planning for Surrey come together in the Surrey Local Resilience Forum, chaired by the Chief Fire Officer, with the aim of coordinating the planning and response to incidents and to promote the cooperation between responders across Surrey.

Surrey's Very High Risks

The Local Resilience Forum is required to review risks and currently the very high risks in Surrey include the following areas,

Pandemic of infectious disease

This is a national risk. The impact would be very high given the expected infection numbers.

Widespread River (Fluvial) flooding

This is a very high risk based on historical events and winter 2013/14 experiences.

National Supply disruption failure – electricity

This a national risk. The impact of losing electricity for three days would be significant in Surrey.

There is a current focus on a number of other risks and threats including Terrorism and the impact on our communities, disruption to the supply chain for critical public services and the impacts from potential cyber-crime.



Emergency preparedness

SFRS has dedicated staff responsible for working with our county, borough and district partners in preparing for emergencies. They work with residents, communities and local businesses to help them create community resilience plans. These plans outline the roles and responsibilities to be activated if an incident occurs, supported by lead agencies and service plans. Key areas of focus are our response to flooding, wildfires and winter weather.

Surrey Fire and Rescue Service relevant strategies and plans

- [Community Risk Register](#)
- [Surrey Major Incident Protocol](#)



Equality Impact Assessment (EIA)

1. Topic of assessment

EIA title	Making Surrey Safer – Our Plans for 2020 - 2023
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EIA author	Sally Wilson
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2. Approval

	Name	Date approved
Approved by		

3. Quality control

Version number		EIA completed	
Date saved		EIA published	

4. EIA team

Name	Job title	Organisation	Team role
Sally Wilson		Surrey Fire and Rescue Service	Lead
Owen Wilson	Equality, Diversity and Inclusion Officer	Surrey Fire and Rescue Service	Data analysis/ compilation

5. Explaining the matter being assessed

What policy, function or service is being introduced or reviewed?

All Fire and Rescue Authorities are required to produce an Integrated Risk Management Plan (IRMP) which considers all of the fire and rescue risks that could affect our communities.

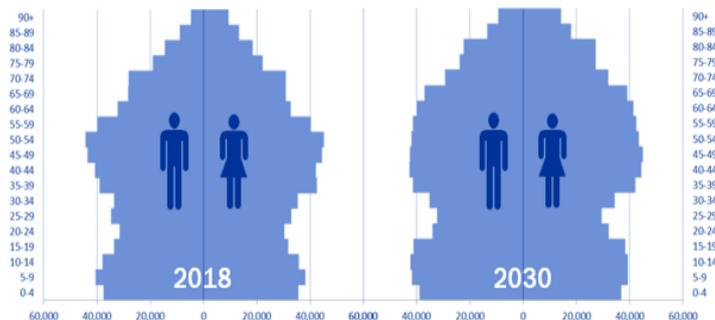
The vision of Surrey Fire and Rescue Service (SFRS) is to make Surrey a safer place to live, work, travel and do business. To achieve this in an ever changing environment, we need to reimagine our service and innovate. This means thinking differently about how we deliver our prevention, protection and response activities and finding better ways of working with partners, residents and businesses. The detail of how we intend to do this is set out in Making Surrey Safer – Our Plan 2020-2023 (“Our Plan”), our new IRMP.

Population Snapshot

As people are living longer, the age profile of the population will alter. There will be an increase in the proportion of people aged over 60 and aged over 85.

Surrey’s population in 2030

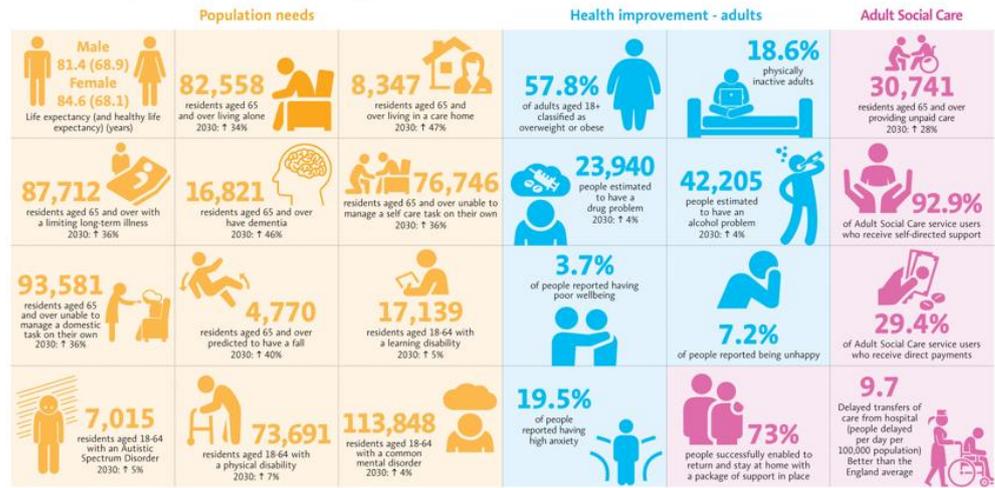
- The latest data shows Surrey’s population is growing rapidly, with more people living longer, consistently high birth rates and high migration levels. For instance, by 2030, over 22% of Surrey residents will be aged 65 and over (compared to 19% in 2018).
- Organisations need to continue adapting to keep pace with the changing and increasingly divergent needs, expectations and aspirations of the population. This includes increasing numbers of older people with more complex care needs and growing numbers of children and young people.



Notes:

- All data is latest available from sources such as Joint Strategic Needs Assessment, Surrey County Council publications and central government datasets
- Benchmarking used to show where Surrey stands out compared to local authority peers, regional and/or national averages

Growing older in Surrey



What proposals are you assessing?

Our Plan makes the following proposals:

- To spend more time on community and business safety prevention and protection activities to reduce the likelihood of emergencies. This means educating people and businesses about the risks of fire and other emergencies, and how to prevent them. This will realign our resources to meet the risk in Surrey and this will ensure that we deliver public value.
- To increase availability of crews at Haslemere and Walton over during weekends, during the days, which will improve our resilience for specific risks including water and wildfire.
- To maintain the number of fire stations in Surrey and change how some of them are crewed. Changes are proposed in the Banstead, Camberley, Egham, Fordbridge, Guildford, Painshill and Woking areas. Camberley, Fordbridge, Guildford and Woking will have one frontline appliance immediately available fire engine available of a night, rather than two. There will be no dedicated night time response cover for Egham, Banstead and Painshill. Night time cover at these locations would come from neighbouring fire stations. The response for the first appliance, would continue, on average, to be less than 10 minutes.
- To increase the number of On Call firefighters in Surrey. We will do this by improving the attractiveness of the role and by increasing the area we can recruit from. This will further improve our availability to respond.
- To charge for some incidents we attend such as false reports of fire (hoax calls and automatic false alarms) and animal rescues so that we can recover our costs. Wherever possible, we will work with partners, business and animal owners (in particular farmers), to avoid the need to respond to these types of incidents in the first place - handing them over to the responsible person(s). This will avoid the need for a charge to be made.

Who is affected by the proposals outlined above?

- All communities in Surrey
- Visitors to the county
- Surrey Fire and Rescue members of staff
- Fire Authority Members
- Surrey Local Authorities and other Emergency Services we work with

6. Sources of information

Engagement carried out

Direct contact:

- 37 face to face briefings offered to all SFRS staff at fire stations were attended by 371 members of staff.
- Briefing for SCC Chairman's Group meeting
- Presentations/ briefings for Elmbridge, Mole Valley and Reigate & Banstead informal local committees
- Presentation at Surrey Police Independent Advisory Group meeting
- Member workshop
- Briefing and Q&A for the Vision Action Group
- Briefing and Q&A for Long Term Neurological Conditions Community Group
- Briefing and Q&A for the East Disability Empowerment Network
- Briefing and Q&A for the Haslemere Lunch Club
- Information shared (by email) with all members of the Surrey Equality Group, Faith Groups, Surrey Minority Ethnic Forum and Sight for Surrey
- Information shared by Catalyst (drug and alcohol service)
- Information shared by Surrey Youth Cabinet (via social media)
- Regular member briefings and FAQs
- Emails to staff.

Print:

- Full and summary versions of the draft plan and questionnaires distributed to libraries, district and borough offices, SCC's contact centre and members of the public (on request).
- Emails to approximately 200 stakeholders, including other emergency services (e.g. Police, NHS, Ambulance and other fire and rescue services), Surrey MPs, borough and county councillors, district and borough council leaders & chief executives, parish councils, business groups, Surrey Coalition of Disabled People members and other partners.
- Posters issued to fire stations, libraries, district and boroughs, colleges, community centres, churches, resident associations and parish councils.
- Postcards issued to libraries and district and boroughs

- Roadside banners at Reigate, Guildford, Camberley, Woking, Walton, Painshill, Sunbury and Egham fire stations
- Articles in newsletters including Surrey Matters, e-brief, Issues Monitor and Communicate.
- Newspaper advertising
- Media –the proposals featured in many items of media during the consultation period, including BBC Surrey radio, Eagle Radio, the Surrey Advertiser and the Herald series. Media work included media releases, a video and radio interviews.

Online:

- Standard and accessible formats (easy read, audio, screen reader and large print from May 2019) of the draft plan/summary document
- On-line consultation survey
- Regular social media promotion on SFRS Twitter and Facebook and SCC Surrey Matters account
- Online advertising, Facebook promoted posts and ad messenger scrolling text banner.

Data used

The following are some examples of the data we have used to support this work to date.

- Fatal Fires Report
- Surrey-i
- Community Risk Profile – Understanding the risks we face is a key part of our decision making process. It forms our planning for how and where we should use our resources to reduce the occurrence and impact of emergency incidents across Surrey. Our [Community Risk Profile](#) document has been developed setting out how the Service works to address risk in Surrey and to achieve the proposals set out in our Plan.
- SFRS local intelligence data
- Office of National Statistics (ONS) data
- Neighbourhood data

7. Impact of the new/amended policy, service or function

This EIA focusses on the overall impact of the Making Surrey Safer – Our Plan 2020-2023.

Impacts may come from changes to both the community safety offer and the change to response times. There are potential impacts from the changes to fire and rescue cover at the stations of Banstead, Camberley, Dunsfold, Egham, Fordbridge, Gomshall, Haslemere, Guildford, Painshill, Walton and Woking. In some areas, response times are predicted to increase, and so it will take longer on average for an appliance to arrive at an incident. In other areas, response times are predicted to decrease, so on average the first appliance will arrive sooner than under the current

system. Appendix C provides the response time data for each Borough/District, and is summarised in the following section.

A change in the way that community and business safety activities are delivered may have positive impacts to certain groups. For example the plan is to increase Safe and Well Visits from approximately 4,500 in 2018 to 20,000 by 2021. Targeted visits could have an overall positive impact for groups at risk of fire, including the elderly and people with disabilities.

The proposals within Making Surrey Safer – Our Plan 2020-2023 set out similar provision for fire and rescue cover at each of the stations as they have now, with the same amount of fire engines at the same locations. The primary difference would be the way in which they are crewed.

Changes to crewing patterns from ‘days and nights’ to ‘days only’ will have an impact on staff. There may be positive and/or negative impacts to individuals depending on their personal circumstances. Patterns in terms of impacts to groups with shared protected characteristics will be assessed by an EIA specific to the changes in crewing patterns, using internal data regarding the specific staff at each station.

No specific issue has been identified at this stage, however there is potential for disproportionate impact to staff with caring responsibilities who are based at stations where day crewing will be implemented. This needs to be analysed in the EIA(s) for the crewing system once these are known and will then be addressed accordingly.

To understand the impact that the proposed changes to crewing patterns will have on the communities that they serve, response times have been analysed. The detail for the choice of data sets used, the different response times in the scenario proposed in the Plan, and supporting data, are contained in Appendix C.

Summary of potential changes to response:

- Daytime response times on a weekday – no change.
- Daytime response times on a weekend - on average a first appliance will arrive at a critical incident 12 seconds sooner under the Plan.
- Night time response cover - on average a first appliance will arrive at a critical incident 38 seconds later under the Plan.
- Average response times – on average a first appliance will arrive at a critical incident 12 seconds later under the Plan, up from 07:22 minutes to 07:34 minutes.

The proposed changes to response times per Borough/District are captured in Appendix C.

Where response times are reduced there is potential for a positive impact on all areas of the community, as at times of emergency the public would receive a more rapid response than the current response. In the proposed scenario, these improved times are found, for the most part, on weekend days resulting from changes in fire and rescue cover at Walton and Haslemere.

Where response times are increased, there is potential for a negative impact on all areas of the community, as at times of emergency the public will have to wait longer for a fire appliance than the current response. There is evidence to suggest that the people most vulnerable to these outcomes are disproportionately likely to come from certain protected characteristics, the elderly and people with disabilities in particular. In the proposed scenario, these increased times are found, for the most part, at night, resulting from changes to night-time cover at Banstead, Camberley, Egham, Fordbridge, Guildford, Painshill and Woking.

The impacts on equalities in regards to people from specific protected characteristics are captured in Section 7a. The Action Plan in Section 9 sets out the mitigating actions to compensate for the potential negative impacts. Our Plan sets out an uplift in business and community safety activity

and over a number of years such activity has been shown to drive down the likelihood of incidents occurring in the first place.

Following the public consultation period, comments were reviewed and compared against the original findings in this EIA. Potential impacts were identified and the EIA was updated where appropriate.

Perceived impacts are:

- Potential cost recovery for animal rescue. This issue was analysed and no evidence was available that indicated a disproportionate impact to any particular group with a specific protected characteristic.
- Risk to residents in high rise accommodation. This issue was analysed and no evidence was available that indicated a disproportionate impact to any particular group with a specific protected characteristic.
- The risk to students in tertiary education in the event of a fire. This issue was analysed and potential impacts were identified, the findings of which are included in section 7a and 9. Mitigating factors have been considered and will be implemented as detailed in section 9.
- The impact on the elderly and vulnerable from reductions in night time fire and rescue cover. This issue had already been covered, but sections 7a and 9 have been updated to acknowledge concerns regarding the trend in more people aged 65 or older living alone with reduced ability to undertake domestic or self-care tasks. Mitigating factors have been considered and will be implemented as detailed in section 9.
- The impact on the ability of Surrey Fire and Rescue Service to respond to water rescue and flooding incidents as a result of changes to crewing patterns. Evidence suggests that males aged 15 to 29 and 45 to 59 are disproportionately likely to suffer death in water related incidents. The majority of these incidents (70%) took place during the day where proposed changes to fire and rescue cover wouldn't have a direct impact. Investing in prevention and educational activities has the potential to reduce these incidents, so may have a particular positive impact on males in these age groups.
- The impact on the ability of Surrey Fire and Rescue Service to respond to air accidents. This issue was analysed and no evidence was available that indicated a disproportionate impact to any particular group with a specific protected characteristic.
- The impact to residents of office to residential conversions in the event of a fire. This issue was analysed and no evidence was available that indicates a disproportionate impact to any particular group with a specific protected characteristic.

7a. Impact of the proposals on residents and service users with protected characteristics

Protected characteristic	Potential positive impacts	Potential negative impacts	Evidence
<p style="text-align: center;">Age</p>	<p>The proposed Lifelong Learning programme will help to identify what community safety provision is most valuable for people in different age groups. The plan is to ensure that safety messages are delivered to residents at all stages of their lives in Surrey, to build communities resilient to fire and other emergencies.</p> <p>Increased, targeted use of our Safe and Well Visit programme should allow us to reduce the risk to vulnerable people in higher risk age groups. A focus on campaigns for older people will allow us to target those most at risk. An uplift in visits from 4,500 to 20,000 by 2021 will significantly increase our capacity.</p> <p>Increased use of wider community safety initiatives may be used to target accident prevention work to at risk groups. For example the Safe Drive Stay Alive programme has delivered road safety awareness</p>	<p>An increase in response times in certain areas at certain times through changes to fire and rescue cover may mean greater risk to life and serious injury. This could have a greater impact on the elderly given their vulnerability statistically to be injured or killed in fires. Furthermore, forecasts suggest that the number of people aged 65 and older who live alone, have dementia, are unable to perform self-care tasks, or are unable to perform domestic tasks will increase. These people are likely to be more vulnerable to fire in the home.</p> <p>Increase in response times to road traffic collisions may hamper our ability to provide emergency first aid and extricate casualties as quickly as we can under the current resourcing model. This may have a greater impact on young people, as they are disproportionately likely to be involved in road collisions, are disproportionately likely to be</p>	<p>A study by Arch and Thurston into Cheshire Fire and Rescue Service shows that in the period 2002-12 community fire safety provision was statistically correlated with a reduction in accidental dwelling fires (ADFs). Analysis on Surrey data in the period 2006 to 2017 indicates a correlation between the number of Safe and Well Visits and a decrease in dwelling fires in Surrey (see Appendix D).</p> <p>In England as a whole, research has demonstrated that older people, people with disabilities, those living in single parent households, males aged 46-60 who live alone and drink and smoke in the home, and young people aged 16-24 (including students) are at a greater risk of dying in fires. Those aged 80 and over have a higher fire-related fatality rate, accounting for 5 per cent of the population but 20 per cent of all fire-related fatalities in 2016/17.</p> <p><u>People aged 65+</u> Internal data shows that in Surrey, in the years 2009-18, 45% of fire fatalities fell into the age group 70+, although they only represented 14% of the population.</p> <p>Data from the community risk profile suggests that by 2030 the number of people aged 65 and older living alone will have increased by 34%. The number of people aged 65 and older with dementia will have increased by 46%. The number of people aged 65 and older unable to perform a self-care task or domestic task will have increased by 36%.</p>

	<p>to approximately 13,500 young people in 2018.</p> <p>Data shows that in Surrey in the years 2015-2018, people in the age groups 15-29 and 45-59 account for 60% of all deaths in water to which SFRS responded. An increase in community engagement and educational work through an expanded community safety programme may serve to reduce incidence of water rescue and fatality to these vulnerable groups.</p> <p>Safe and Well Visits look at all elements of a family's lifestyle and circumstances. They offer meaningful advice and interventions to help ensure that families not only stay safe in their homes but get wider support in their community. An uplift in these visits could mean more families can be better protected.</p>	<p>killed or seriously injured in road collisions, and are likely to be involved in road collisions at night where fire and rescue cover will be reduced.</p> <p>Students have been shown to be at a greater risk from fire. Large concentrations of young people, including students, are resident in Runnymede and Guildford due in part to the presence of tertiary education establishments. These boroughs are predicted to have longer average response times under the proposed plans.</p> <p>S11 Children Act 2004 imposes a duty to ensure that decisions affecting children have regard to the need to safeguard them and protect their welfare. An increase in response times in certain areas at certain times through changes in fire and rescue cover may mean greater risk to life and serious injury. This could have a greater impact for families with children in areas where cover will be reduced at night.</p>	<p><u>Young People</u> Young drivers (aged 17-24) are known to be in the highest risk group for road traffic collisions. Department of Transport Data shows that in 2013 in Great Britain, drivers in this age group accounted for 5% of miles travelled but 18% of reported road traffic collisions.</p> <p>The road safety charity, Brake, highlight that in the UK, male drivers aged 17-20 are seven times more likely to crash than all male drivers, but between the hours of 2am and 5am their risk is 17 times higher (2005 data). This may not reflect the situation in Surrey.</p> <p>Data from Surrey County Council's Travel and Transport Group shows that in the years 2004 to 2016, 25% of all people killed or seriously injured in road traffic collisions were aged 17-24. This age group only makes up 11% of the driving age population (17+). Data from RoSPA and the Water Incident Database shows that in England in the period 2015 – 2018, males accounted for 83.7% of all naturally occurring or accidental deaths in water. Of these, 51.4% were males in the 15-29 and 45-69 age brackets. Internal data shows that in Surrey in the years 2015-2018, 60% of all deaths in water to which SFRS responded were in the age groups 15-29 and 45-59. 70% of these incidents occurred in the hours of 07:00 to 19:00. 75% of these incidents occurred on a week day, and 25% on a weekend day.</p> <p>Surrey picture of the population There are estimated to be 72,900 children aged under 5 in Surrey (6.2% of the population). Elmbridge (7.4%) and Woking (7.2%) have the highest proportion of under 5s and Mole Valley the lowest (5.3%).</p> <p>There are estimated to be 169,500 children aged 5-16</p>
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			<p>(14.5% of the population). Elmbridge has the highest proportion of children (16.3%) and Runnymede the lowest (12.5%).</p> <p>There are estimated to be 104,400 people aged 17-24 making up almost a tenth of the population (8.9%). Runnymede (14.0%) and Guildford (13.8%) have the highest percentage due to the universities situated in these boroughs, and Elmbridge the lowest (6.5%).</p> <p>There are estimated to be 605,300 people aged 25-64 making up just over half of the population (51.8%). Woking has the highest percentage (54.0%) and Waverley the lowest (48.9%).</p> <p>There are estimated to be 216,700 older people aged 65+, making up just under one in five (18.5%) of the population. Mole Valley has the highest proportion of older people (22.8%) and Guildford the lowest (16.3%).</p> <p>Appendix B1 provides a breakdown of age groups per Borough/District.</p>
<p>Disability</p>	<p>Increased, targeted use of our Safe and Well Visit programme should allow us to reduce the risk to vulnerable people with disabilities.</p> <p>An uplift in visits from 4,500 to 20,000 by 2021 will significantly increase our capacity.</p> <p>Increased use of wider community safety initiatives may be used to target accident</p>	<p>An increase in response times in certain areas at certain times through changes to fire and rescue cover may mean greater risk to life and serious injury. This could have a greater impact on those with mobility or mental health issues given their vulnerability statistically to be injured or killed in fire, and on people with mobility issues given that they may have greater difficulty escaping a fire.</p>	<p><u>Census 2011</u> In 2011, 13.5% of residents in Surrey reported a health problem, with 7.8% limited a little and 5.7% limited a lot. The overall proportion reporting a health problem was unchanged from 2001.</p> <p>The proportion of the Surrey population reporting a health problem is highest in Spelthorne (14.9%) and lowest in Elmbridge (12.1%). Fewer Surrey residents reported a health problem than the national average. In England as a whole 17.6% reported a health problem with 9.3% limited a little and 8.3% limited a lot.</p> <p><u>Disability and Mobility:</u></p>

	<p>prevention work to at risk groups.</p>	<p>Between April 2006 and March 2012, of the 16 people who died in a fire in Surrey, 7 (45%) were known to have mobility issues that affected their ability to escape the fire. All the people who were asleep at the time of the fire had additional underlying issues of restricted mobility, mental health and/or alcohol misuse. (CRP 2013/14)</p> <p><u>Mental Health:</u> The fatal fires analysis highlights mental health issues as a contributory factor to accidental dwelling fire deaths.</p> <p>9 of the 18 people who died in fires outside the home between April 2006 and March 2016 were suffering from mental health issues.</p> <p>The numbers of people with alcohol and drug dependencies are also forecast to rise by 4% by 2030.</p> <p><u>Race and ethnicity:</u> Differences in the levels of mental well-being and prevalence of mental disorders are influenced by a complex combination of socio-economic factors, racism, diagnostic bias and cultural and ethnic differences and are reflected in how mental health and mental distress are presented, perceived and interpreted.</p> <p><u>Gender:</u> Gender impacts significantly on risk and protective factors for mental health and expression of the experience of mental distress. Neurotic disorders including depression, anxiety, attempted suicide and self-harm are more prevalent in women than men, while suicide, drug and alcohol abuse, anti-social personality disorder, crime and violence are more prevalent among men. Gay, lesbian, bisexual and gender reassignment people are at increased risk for some mental health problems –</p>
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			<p>notably anxiety, depression, self-harm and substance misuse – and more likely to report psychological distress than their heterosexual counterparts.</p> <p><u>Smoking (and Mental Health):</u> Surrey’s Joint Strategic Needs Assessment (JSNA) also identifies that mental health service users exhibit rates of smoking at least twice that found among the general population. Between April 2006 and March 2016, in 35% of the accidental fatal dwelling fires, smoking materials was the primary cause of the fires.</p> <p>Appendix provides a breakdown of B2 Long term illness or disability per Borough/District</p>
Gender reassignment	There is no indication that there will be a significant impact on people with this protected characteristic.	There is no indication that there will be a significant impact on people with this protected characteristic	Data on gender reassignment across the county is limited. The Office of National Statistics have identified the need for this data to inform further policy making decisions.
Pregnancy and maternity	The proposed Lifelong Learning programme will help to identify what community safety provision is most valuable for people in different age groups. The plan is to ensure that safety messages are delivered to residents at all stages of their lives in Surrey, to build communities resilient to fire and other emergencies.	An increase in response times in certain areas at certain times through changes to fire and rescue cover may mean greater risk to life and serious injury. This could have a greater impact for people generally in areas where cover will be reduced.	Expectant and new mothers could potentially be more at risk when escaping from a fire, as emergency evacuation may be difficult due to reduced agility, dexterity, co-ordination, speed, reach and balance. Mothers will also face the additional difficulty of evacuating babies and/or young children. Further research needs to be done to establish a link between pregnancy/maternity and risk from fire and other emergencies.
Race	Increased, targeted use of our Safe and Well Visit programme and business fire safety auditing should allow us to reduce the risk to residents and businesses from all groups. Community	There is no indication that there will be a significant impact on people with this protected characteristic	<i>The breakdown of racial/ethnic groups by Borough/District can be found in the appendices (A and B3) to this document, and are taken from Surrey-i – 2011 census data.</i>

	<p>outreach programmes will assist in ensuring that people who have English as a second language will receive appropriate fire safety provision.</p>		<p>In some areas there are populations of people from certain ethnic backgrounds notably larger than the Surrey average (mean). Elmbridge, Reigate and Banstead, Runnymede, Spelthorne and Woking are all cases in point. Of these, Runnymede is facing the biggest impact to response times under the proposed changes. It could be argued that the Indian community are disproportionately affected by the changes to response times, as the Indian population in Runnymede is 39% higher than the Surrey average. However there is no evidence to suggest that people from an Indian background in Runnymede will be disproportionately affected compared to the community of Runnymede as a whole. Furthermore Runnymede will retain a response time within the target of 10 minutes and quicker than the Surrey mean.</p>
<p>Religion and belief</p>	<p>Increased, targeted use of our Safe and Well Visit programme and business fire safety auditing should allow us to reduce the risk to residents and businesses from all groups. Community outreach programmes will assist in ensuring that fire safety activities will take place in places of religious worship in order to reach a large audience.</p>	<p>There is no indication that there will be a significant impact on people with this protected characteristic.</p>	<p><i>The breakdown of religious groups by Borough/District can be found in the appendices (A and B4) to this document, and are taken from Surrey-i – 2011 census data.</i></p> <p>In certain areas there are populations of people from certain religions notably larger than the Surrey mean. Epsom and Ewell, Spelthorne and Woking are all cases in point. All of these boroughs will retain a response time within the target of 10 minutes and quicker than the Surrey mean, so it cannot be clearly argued that people from any particular religion will be disproportionately impacted by changes to fire and rescue cover.</p>
<p>Sex</p>	<p>In Surrey in the years 2015-2018 85% of FRS incidents involving fatalities in water the casualties were males. An increase in community engagement and educational work through an expanded</p>	<p>There is no indication that there will be a significant impact on people with this protected characteristic</p>	<p>Surrey's population, according to the ONS's estimates for 2017 is 50.9% female and 49.1% male in all age groups as a whole. Guildford Borough has the most statistically balance population, with 50% male and female, and Elmbridge Borough the least balanced, with 51.6% female and 48.4% male. Further information is available in Appendix B5.</p>

	community safety programme may serve to reduce incidence of water rescue and fatality to this vulnerable group.		Data from RoSPA and the Water Incident Database shows that in England in the period 2015 – 2018, males accounted for 83.7% of all naturally occurring or accidental deaths in water. Internal data shows that in Surrey in the years 2015-2018, 85% of water related fatalities that SFRS responded to were males. 70% of these incidents occurred in the hours of 07:00 to 19:00. 75% of these incidents occurred on a week day, and 25% on a weekend day.
Sexual orientation	There is no indication that there will be a significant impact on people with this protected characteristic	There is no indication that there will be a significant impact on people with this protected characteristic	<p>Data on sexual orientation across the county is limited. ONS estimates are by County and are not broken down into Borough so do not contain the detail necessary for analysis. Estimates suggest that in 2013-15 97.3 % of the Surrey population was heterosexual, 0.7% gay or lesbian, 0.3% bisexual, 0.3% other and 5.1% don't know or refuse to comment. This is broadly in line with National estimates. There is a slightly higher estimated percentage of heterosexual individuals compared to the National average (93.5%) a slightly lower estimated percentage of gay or lesbian (1.2% Nationally), a lower estimated percentage of bisexual (0.6 Nationally), a lower estimated percentage of "other" (0.4 Nationally) and a higher estimated percentage of those who didn't know or preferred not to comment (4.4 Nationally).</p> <p>There is no strong evidence to suggest that people of any particular sexual orientation may be at a higher risk of injury from fire or other FRS-relevant incidents.</p>
Marriage and civil partnerships	There is no indication that there will be a significant impact on people with this protected characteristic	There is no indication that there will be a significant impact on people with this protected characteristic	<p>People who live alone, rather than those who live with partners, are at higher risk of accidental fires.</p> <p>The largest change (in the number of people living alone by age group, 2005 – 2015) is in the 45 to 64 age group, where the number of people living alone increased by 23% between 2005 and 2015, a statistically significant change. This is partly due to the increasing population aged 45 to 64 in the UK over this period, as the 1960s baby boom</p>

			<p>generation have been reaching this age group. The increase could also be due to a rise in the proportion of the population aged 45 to 64 who are divorced or never married.</p> <p>Appendix B6 provides a breakdown of marital status by Borough/District.</p>
<p>Carers (protected by association)</p>	<p>Increased, targeted use of our Safe and Well Visit programme should allow us to reduce the risk to vulnerable people in higher risk groups. Improved fire safety in these homes may help protect carers by association.</p>	<p>An increase in response times in certain areas at certain times through changes to fire and rescue cover may mean greater risk to life and serious injury. This is likely to have a greater impact on elderly and disabled residents. Their carers may be impacted by association, but there is no clear evidence for this.</p>	<p>There is no clear evidence available to correlate adverse impact to carers with changes to fire and rescue response times.</p>

7b. Impact of the proposals on staff with protected characteristics

Protected characteristic	Potential positive impacts	Potential negative impacts	Evidence
<p>Age</p>	<p>An increase in dedicated fire safety roles may provide opportunities for firefighters for whom the fitness requirements of an operational role can become progressively more challenging.</p>	<p>No specific issue has been identified at this stage</p>	<p>A 1990 study by Rogers et al found that, from the age of 30, VO2 max (VO2 max measures the optimum rate at which heart, lungs and muscles can effectively use oxygen during exercise) declines by 12% per decade. VO2 max is used as a factor in determining firefighter fitness.</p> <p>Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.</p>

Disability	An increase in dedicated fire safety roles may provide opportunities for firefighters who develop disabilities that prohibit an operational role, such as reduced mobility.	No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Gender reassignment		No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Pregnancy and maternity		No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Race		No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Religion and belief		No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Sex		No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Sexual orientation		No specific issue has been identified at this stage	Data on the profile of the Service according to sexual orientation is not mandatory for employees to declare, and to date responses have been at low levels. This leaves the Service with limited data on the number of LGBT employees in Service. Therefore it is not possible to tell whether members of a particular sexual orientation are impacted positively or negatively, for example therefore suffer an indirect impact through the service restructure. Efforts will be undertaken to capture better staff demographic data in order to better understand impacts in future. Positive action could be taken to mitigate any adverse risk. On a national level data from the Fire & Rescue Service Equality and Diversity Strategy 2008 – 2018 demonstrates that there is recognition that the number of gay, lesbian and bisexual Fire & Rescue Service employees who feel

			able to be open about their sexuality at work is less than 10 per cent of the national average. Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Marriage and civil partnerships		No specific issue has been identified at this stage	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.
Carers (protected by association)	No specific benefit has been identified at this stage, however there is potential for flexible working to have a positive impact to staff with caring responsibilities who are based at stations where day crewing will be implemented. This needs to be analysed in the individual EIAs for each region/station affected.	No specific issue has been identified at this stage, however there is potential for disproportionate impact to staff with caring responsibilities who are based at stations where day crewing will be implemented. This needs to be analysed in the individual EIAs for each crewing system once these are known.	Any change to the duty system will incorporate a dedicated Equality Impact Assessment which will assess the impacts on staff with this protected characteristic.

8. Amendments to the proposals

Change	Reason for change

9. Action plan

Potential impact (positive or negative)	Action needed to maximise positive impact or mitigate negative impact	By when	Owner
An increase in targeted fire safety provision should reduce the risk to the most people most vulnerable to fire, which includes the elderly and people with restricted mobility, sensory impairments and mental health issues	Targeted campaigns in coordination with community engagement programmes will assist in delivering fire safety provision to people most vulnerable from fire and other emergencies.	Frequency based on risk analysis and Person Centred Approach	Andrew Treasure
The increase in response times through changes to fire and rescue cover at several fire stations may mean greater risk to life and serious injury. This could have a greater impact on the following groups: <ul style="list-style-type: none"> the elderly given their vulnerability statistically to be injured or killed in fires, and on the elderly and parents with young children given that they may have greater difficulty escaping a fire. those with mobility or mental health issues given their vulnerability statistically to be injured or killed in fire, and on the disabled given that they may have greater difficulty escaping a fire. On Carers and the children or adults they 	<p>Additional investment will be allocated to fire safety provision. Prevention work will continue across the County, e.g. Safe and Well Visits (SAWVs), in order to inform and educate the public about reducing the risk of fire and other emergencies. Individuals at greatest risk, such as the elderly and people with mobility issues will be targeted to improve equality of opportunity in fire safety provision. The number of SAWVs is proposed to increase from 4,500 in 2018 to 20,000 by 2021.</p> <p>A key priority for Surrey County Council is to support people to live at home for longer. Telecare is the name given to the range of sensors which link with the traditional community or lifeline alarms. Telecare equipment ranges from pendants that can be worn to smoke and carbon monoxide detectors, and bed and falls sensors for those with mobility</p>	<p>Increases on an annual basis</p> <p>Increases in partnerships on an annual basis</p>	<p>Andrew Treasure</p> <p>Andrew Treasure</p>

<p>are caring for in particular given that they may have greater difficulty escaping a fire.</p> <ul style="list-style-type: none"> • Young people are statistically at a high risk from death and serious injury resulting from road traffic collisions. Reduction in night time fire and rescue cover may impact on the time it takes to rescue them. • Students in further educational establishments may be at higher risk from fire. Reduction in night time fire and rescue cover may impact on the time it takes to rescue them. • An increase in water safety education as part of the Lifelong Learning programme and increased community safety provision may help reduce the number of water rescue incidents, which will be a particular benefit to males who make up the majority of casualties. 	<p>difficulties. The sensors are designed to assist people of all ages to live more independently by monitoring their safety. In Surrey, when a linked smoke detector is activated, SFRS will respond. The predicted rise in the number of supported residents means that we will continue to work with partners to ensure they refer supported residents to us for advice via our SAWVs.</p> <p>Further roll-out of road safety education will assist in reducing the risks to young drivers. Road User Awareness Days and the Safe Drive Stay Alive programme can reach thousands of young people every year. Their impact needs to be assessed, as there is no clear evidence to show the correlation between increased road safety campaigns and a decrease in accidents.</p> <p>Increased delivery of business safety provision will allow SFRS to better assess the risks of campuses and halls of residence, suggest improvements and enforce against non-compliance where appropriate.</p> <p>In all instances, the effect of community and business safety programmes must be assessed to quantify their effect on reducing risks. This will allow SFRS to determine whether they are effective at mitigating impacts from changes to fire and rescue cover at night.</p> <p>Drills and exercises will be run at university campuses and halls of residence affected. This will allow us to check that responsible persons are fulfilling their responsibilities under fire safety legislation.</p>	<p>Annually</p> <p>Increases on an annual basis</p> <p>Annually</p> <p>An exercise per year</p>	<p>Andrew Treasure</p> <p>Andrew Treasure</p> <p>Andrew Treasure</p> <p>Gary Locker</p>
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<p>General impacts to people of different protected groups may not be immediately evident from existing analysis.</p>	<p>Robust equality monitoring during the consultation process may reveal patterns in views relevant to protected groups.</p>	<p>End of September 2019</p>	<p>Sarah Kershaw</p>
<p>Temporal fire patterns within Surrey, and specifically in the areas most directly affected by the proposed changes, need to be analysed to assess the potential impact on different groups.</p>	<p>Negative impacts may be mitigated by an increase of targeted fire safety provision, but the overall effect of such mitigation should be assessed. SAWVs will increase from 4,500 to 20,000 by 2021.</p>	<p>Increases on an annual basis</p>	<p>Andrew Treasure</p>

10. Potential negative impacts that cannot be mitigated

Potential negative impact	Protected characteristic(s) that could be affected
No impact has been identified for which measures cannot be taken in an attempt at mitigation. However the anticipated positive impacts of mitigation will be monitored using evaluative performance measures to assess effectiveness.	

11. Summary of key impacts and actions

Information and engagement underpinning equalities analysis	<p>Full public consultation was undertaken and responses considered in regard to potential impacts. The findings of the consultation process can be found at:</p>
Key impacts (positive and/or negative) on people with protected characteristics	<p>Increased business and community safety provision will benefit all sectors of our community, and there will be an increased focus on fire safety for people who are most vulnerable, which includes people 65 and older and people with disabilities. Increases in response times might impact young drivers and older people.</p>
Changes you have made to the proposal as a result of the EIA	<p>The content of the EIA, and the impacts identified, have been considered along with feedback from the consultation when developing the final plan. No substantive changes have been made to the initial proposals. However there are clear actions that we can take to mitigate the impact set out here whilst still delivering the plan.</p>
Key mitigating actions planned to address any outstanding negative impacts	<p>Business and community safety work will see a significant increase across the County, including all areas which are being affected by a change in fire and rescue cover. Work will look into focussing on people and communities most vulnerable to fire and other emergencies and those who have had lower than average levels of fire safety engagement.</p>
Potential negative impacts that cannot be mitigated	

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Appendix A

Summary of protected characteristics in Borough/Districts potentially directly affected by proposed changes to fire and rescue cover.

Data from Surrey-i.

Percentages are given to 3 significant figures.

A more detailed breakdown of data by Borough/District and protected characteristic can be found in Appendix B.

In any group where representation was 25% or more above the Surrey average (mean), mention has been given to this group in this summary. In the tables in Appendix B, these figures are highlighted in yellow. Although seemingly arbitrary, this figure allowed a consistent methodology to be applied to all groups within each protected characteristic for which we have data. The figure of 25% highlighted areas that had a greater representation of people from certain characteristics than the Surrey mean. A number much lower than 25% would provide too many examples for meaningful analysis, and a number much higher would provide too few examples, so 25% was chosen as the threshold.

No data is available for the protected characteristics of gender reassignment, pregnancy and maternity, sexual orientation or carers (protected by association).

Borough/District	Summary of specific demographics in Borough.
Elmbridge	Analysis of Surrey-i data shows no group with protected characteristics for which we have data with a population 25% or greater than the mean.
Epsom and Ewell	2011 data show Epsom and Ewell having a population of people from the ethnic group "Asian/Asian British: Indian" as 33.3% above the Surrey mean (2.4% and 1.8% respectively). The same data show people from the ethnic group "All Black/African/Caribbean/Black British ethnic groups" as 36% above the Surrey mean (1.5% and 1.1% respectively). No other ethnic group show a population 25% or higher than the mean. 2011 data show Epsom and Ewell having a population of people from the Hindu religion as 92% above the Surrey mean (2.5% and 1.3% respectively). The same data show a population of people from the Muslim religion as 36% above the Surrey mean (3% and 2.2% respectively). No other religious group show a population 25% or higher than the mean. No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.
Guildford	2017 age group estimates show Guildford having a population in the 15-30 age range as 44.4% above the Surrey mean (24.1% and 16.7% respectively). No other age group show a population 25% or higher than the mean. No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.
Mole Valley	Analysis of Surrey-i data shows no group with protected characteristics for which we have data with a population 25% or greater than the mean.

Reigate and Banstead	2011 data show Reigate and Banstead having a population of people from the ethnic group "All Black/African/Caribbean/Black British ethnic groups" as 43.2% above the Surrey mean (1.57% and 1.10% respectively). No other ethnic group show a population 25% or higher than the mean. No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.
Runnymede	2017 age group estimates show Runnymede having a population in the 15-30 age range as 41.7% above the Surrey mean (23.6% and 16.7% respectively). No other age group show a population 25% or higher than the mean. 2011 data show Runnymede having a population of people from the ethnic group "Asian/Asian British: Indian" as 40.6% above the Surrey mean (2.51% and 1.79% respectively). No other ethnic group show a population 25% or higher than the mean. No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.
Spelthorne	2011 data show Spelthorne having a population of people from the ethnic group "Asian/Asian British: Indian" as 135% above the Surrey mean (4.20% and 1.79% respectively), the same data show people from the ethnic group "All Black/African/Caribbean/Black British ethnic groups" as 47.2% above the Surrey mean (1.62% and 1.10% respectively). No other ethnic group show a population 25% or higher than the mean. 2011 data show Spelthorne having a population of people from the Hindu religion as 83.9% above the Surrey mean (2.44% and 1.33% respectively). No other religious group show a population 25% or higher than the mean. Internal data show Spelthorne having a population of people classed as vulnerable to fire as 36% above the Surrey mean (0.079% and 0.058% respectively). No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.
Surrey Heath	Analysis of Surrey-i data shows no group with protected characteristics for which we have data with a population 25% or greater than the mean.
Tandridge	Internal data show Tandridge having a population of people classed as vulnerable to fire as 34% above the Surrey mean (0.078% and 0.058% respectively). No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.
Waverley	Analysis of Surrey-i data shows no group with protected characteristics for which we have data with a population 25% or greater than the mean.
Woking	2011 data show Woking having a population of people from the ethnic group "Asian/Asian British: Indian" as 31.4% above the Surrey mean (2.35% and 1.79% respectively). The same data show people from the ethnic group "Asian/Asian British: Pakistani" as 500% above the Surrey mean (5.73% and 0.96% respectively). The same data show people from the ethnic group "All Black/African/Caribbean/Black British ethnic groups" as 27% above the Surrey mean (1.39% and 1.10% respectively). No other ethnic group show a population 25% or higher than the mean. 2011 data show Woking having a population of people from the Hindu religion as 48.4% above the Surrey mean (1.97% and 1.33% respectively). The same data show a population of people from the Muslim religion as 243% above the Surrey mean (7.38% and 2.15% respectively). No other religious group show a population 25% or higher than the mean. No other group within other protected characteristics for which we have data show a population 25% or greater than the mean.

Appendix B

Population information by protected characteristic by Surrey Borough/Districts.

Data from Surrey-i.

Percentages are given to 1 decimal point or 3 significant figures as appropriate.

No data is available for the protected characteristics of gender reassignment, pregnancy and maternity, sexual orientation or carers (protected by association).

Age data was sourced in 5-year divisions and has been grouped into larger blocks for analysis.

B1 – Age groups per Borough/District (adapted from Surrey-I – ONS Population estimates by 5 year age groups and gender).

Region	All ages	Age 0-14	%0-14	Age 15-30	%15-30	Age 30-44	%30-44	Age 45-64	%45-64	Age 65+	%65+
<i>England</i>	55619430	10048365	18.1	10478495	18.8	10842801	19.5	14219258	25.6	10030511	18.0
Surrey	1185321	219560	18.5	197622	16.7	228477	19.3	317430	26.8	222232	18.7
Elmbridge	136379	28656	21.0	18191	13.3	27268	20.0	37686	27.6	24578	18.0
Epsom and Ewell	79451	15231	19.2	12993	16.4	15789	19.9	21003	26.4	14435	18.2
Guildford	147777	24886	16.8	35579	24.1	27327	18.5	35696	24.2	24289	16.4
Mole Valley	87128	14588	16.7	12428	14.3	14301	16.4	25785	29.6	20026	23.0
Reigate and Banstead	146383	28245	19.3	22112	15.1	30679	21.0	38860	26.5	26487	18.1
Runnymede	86882	14277	16.4	20519	23.6	15927	18.3	21318	24.5	14841	17.1
Spelthorne	99120	18220	18.4	15356	15.5	20511	20.7	26625	26.9	18408	18.6
Surrey Heath	88765	16012	18.0	13940	15.7	16420	18.5	25272	28.5	17121	19.3
Tandridge	87297	15745	18.0	13149	15.1	15882	18.2	24625	28.2	17896	20.5
Waverley	125010	23248	18.6	18487	14.8	21782	17.4	34265	27.4	27228	21.8
Woking	101129	20452	20.2	14868	14.7	22591	22.3	26295	26.0	16923	16.7

B2 – Long term illness or disability per Borough/District (taken Surrey-i - 2011 census data)

Region	All persons	Number without long term illness or disability	% Without long term illness or disability	Long term illness or disability - All with day-to-day activities limited	Long term illness or disability - % with day-to-day activities limited
<i>England</i>	<i>53012456</i>	<i>43659870</i>	<i>82.4</i>	<i>9352586</i>	<i>17.6</i>
Surrey	1132390	979036	86.5	153354	13.5
Elmbridge	130875	115044	87.9	15831	12.1
Epsom and Ewell	75102	65036	86.6	10066	13.4
Guildford	137183	119867	87.4	17316	12.6
Mole Valley	85375	72833	85.3	12542	14.7
Reigate and Banstead	137835	118569	86.0	19266	14.0
Runnymede	80510	69355	86.1	11155	13.9
Spelthorne	95598	81334	85.1	14264	14.9
Surrey Heath	86144	75304	87.4	10840	12.6
Tandridge	82998	70686	85.2	12312	14.8
Waverley	121572	104695	86.1	16877	13.9
Woking	99198	86313	87.0	12885	13.0

B3 – Race/Ethnicity per Borough/District (taken from Surrey-i - 2011 census data)

Region	All People	White British	% White British	White: All other White ethnic groups	% White: All other White	All mixed/ multiple ethnic groups	% All mixed/ multiple ethnic groups	Asian/ Asian British: Indian	% Indian	Asian/ Asian British: Pakistani	% Pakistani	All Black/African/Caribbean/Black British ethnic groups	% Black/African/Caribbean/Black British	All other Asian ethnic groups	% other Asian ethnic group	Other ethnic groups	% Other ethnic groups	All non-white ethnic groups	% non-white ethnic groups	All ethnic groups except white British	% not white British
Surrey	1132390	945673	83.5	78009	6.9	23554	2.1	20232	1.8	10818	1.0	12430	1.1	32448	2.9	9226	0.8	108708	9.6	186717	16.5
Elmbridge	130875	104508	79.9	13615	10.4	3411	2.6	2489	1.9	555	0.4	1010	0.8	4031	3.1	1256	1.0	12752	9.7	26367	20.1
Epsom and Ewell	75102	59049	78.6	5453	7.3	1922	2.6	1828	2.4	667	0.9	1128	1.5	3989	5.3	1066	1.4	10600	14.1	16053	21.4
Guildford	137183	114510	83.5	10197	7.4	2501	1.8	1661	1.2	487	0.4	1656	1.2	4468	3.3	1703	1.2	12476	9.1	22673	16.5
Mole Valley	85375	76907	90.1	4261	5.0	1257	1.5	707	0.8	152	0.2	399	0.5	1318	1.5	374	0.4	4207	4.9	8468	9.9
Reigate and Banstead	137835	117092	85.0	7787	5.6	3037	2.2	2192	1.6	1189	0.9	2166	1.6	3611	2.6	761	0.6	12956	9.4	20743	15.0
Runnymede	80510	64397	80.0	7236	9.0	1671	2.1	2022	2.5	378	0.5	862	1.1	3161	3.9	783	1.0	8877	11.0	16113	20.0
Spelthorne	95598	77411	81.0	6044	6.3	2382	2.5	4013	4.2	656	0.7	1545	1.6	2626	2.7	921	1.0	12143	12.7	18187	19.0
Surrey Heath	86144	73179	84.9	4513	5.2	1626	1.9	1713	2.0	667	0.8	861	1.0	3009	3.5	576	0.7	8452	9.8	12965	15.1
Tandridge	82998	74095	89.3	3785	4.6	1789	2.2	746	0.9	139	0.2	882	1.1	1279	1.5	283	0.3	5118	6.2	8903	10.7
Waverley	121572	110190	90.6	6527	5.4	1623	1.3	533	0.4	246	0.2	538	0.4	1504	1.2	411	0.3	4855	4.0	11382	9.4
Woking	99198	74335	74.9	8591	8.7	2335	2.4	2328	2.3	5682	5.7	1383	1.4	3452	3.5	1092	1.1	16272	16.4	24863	25.1

B4 – Religion per Borough/District (taken from Surrey-i - 2011 census data)

Region	All residents	Christian	% Christian	Hindu	% Hindu	Muslim	% Muslim	Other religion	% Other	No religion	% No religion	Not stated	% Not stated	All non-Christian religions	% Non-Christian
<i>England</i>	53012456	31479876	59.4	806199	1.5	2660116	5.0	1147929	2.2	13114232	24.7	3804104	7.2	4614244	8.7
Surrey	1132390	711110	62.8	15018	1.3	24378	2.2	16994	1.5	280814	24.8	84076	7.4	56390	5.0
Elmbridge	130875	83973	64.2	1593	1.2	2406	1.8	2447	1.9	30606	23.4	9850	7.5	6446	4.9
Epsom and Ewell	75102	46222	61.5	1913	2.5	2277	3.0	1109	1.5	18254	24.3	5327	7.1	5299	7.1
Guildford	137183	82621	60.2	1301	0.9	2713	2.0	1839	1.3	38108	27.8	10601	7.7	5853	4.3
Mole Valley	85375	54926	64.3	564	0.7	669	0.8	960	1.1	21514	25.2	6742	7.9	2193	2.6
Reigate and Banstead	137835	85325	61.9	1880	1.4	2637	1.9	1597	1.2	36262	26.3	10134	7.4	6114	4.4
Runnymede	80510	51037	63.4	1181	1.5	1556	1.9	1628	2.0	19297	24.0	5811	7.2	4365	5.4
Spelthorne	95598	60954	63.8	2332	2.4	1808	1.9	2298	2.4	21511	22.5	6695	7.0	6438	6.7
Surrey Heath	86144	54646	63.4	1369	1.6	1607	1.9	1733	2.0	20610	23.9	6179	7.2	4709	5.5
Tandridge	82998	53841	64.9	612	0.7	596	0.7	750	0.9	20976	25.3	6223	7.5	1958	2.4
Waverley	121572	79220	65.2	321	0.3	786	0.6	1254	1.0	30745	25.3	9246	7.6	2361	1.9
Woking	99198	58345	58.8	1952	2.0	7323	7.4	1379	1.4	22931	23.1	7268	7.3	10654	10.7

B5 – Sex/ Gender per Borough/District (adapted from Surrey-i – ONS population estimates by broad age and gender)

Area	Year	Males - All ages	% male	Females - All ages	% female
<i>ENGLAND</i>	<i>2017</i>	<i>27,481,053</i>	<i>49.4</i>	<i>28,138,377</i>	<i>50.6</i>
Surrey	2017	581,836	49.1	603,485	50.9
Elmbridge	2017	66,063	48.4	70,316	51.6
Epsom and Ewell	2017	38,600	48.6	40,851	51.4
Guildford	2017	73,891	50.0	73,886	50.0
Mole Valley	2017	42,567	48.9	44,561	51.1
Reigate and Banstead	2017	71,476	48.8	74,907	51.2
Runnymede	2017	42,251	48.6	44,631	51.4
Spelthorne	2017	48,959	49.4	50,161	50.6
Surrey Heath	2017	43,946	49.5	44,819	50.5
Tandridge	2017	42,493	48.7	44,804	51.3
Waverley	2017	61,177	48.9	63,833	51.1
Woking	2017	50,413	49.9	50,716	50.1

B6 – Marital status by Borough/District (taken from Surrey-I - 2011 census data). N.b. 2011 census data gathered prior to legalisation of same-sex marriage in 2014.

Region	All Residents Aged 16 and Over	Single (never married or in civil partnership)	% Single	Married	% Married	In a Registered Same-Sex Civil Partnership	% In a Registered Same-Sex Civil Partnership	Separated (but Still Legally Married or Still Legally in a Same-Sex Civil Partnership)	% Separated	Divorced or Formerly in a Same-Sex Civil Partnership which is Now Legally Dissolved	% Divorced or Formerly in a Same-Sex Civil Partnership which is Now Legally Dissolved	Widowed or Surviving Partner from a Same-Sex Civil Partnership	% Widowed or Surviving Partner from a Same-Sex Civil Partnership
<i>England</i>	42989620	14889928	34.6	20029369	46.6	100288	0.2	1141196	2.7	3857137	9	2971702	6.9
Surrey	913899	275477	30.1	480655	52.6	1602	0.2	20563	2.3	74056	8.1	61546	6.7
Elmbridge	103005	28321	27.5	56760	55.1	245	0.2	2308	2.2	8482	8.2	6889	6.7
Epsom and Ewell	60371	18711	31	31950	52.9	94	0.2	1259	2.1	4384	7.3	3973	6.6
Guildford	112589	39639	35.2	55650	49.4	174	0.2	2337	2.1	8282	7.4	6507	5.8
Mole Valley	69580	18557	26.7	38252	55	111	0.2	1534	2.2	5846	8.4	5280	7.6
Reigate and Banstead	110725	34056	30.8	57055	51.5	194	0.2	2481	2.2	9251	8.4	7688	6.9
Runnymede	66653	23657	35.5	31353	47	111	0.2	1532	2.3	5580	8.4	4420	6.6
Spelthorne	78089	24562	31.5	38984	49.9	153	0.2	2042	2.6	6870	8.8	5478	7
Surrey Heath	69302	18791	27.1	38960	56.2	100	0.1	1489	2.1	5578	8	4384	6.3
Tandridge	66922	19265	28.8	35350	52.8	111	0.2	1582	2.4	5791	8.7	4823	7.2
Waverley	97478	26219	26.9	53874	55.3	161	0.2	2124	2.2	7848	8.1	7252	7.4
Woking	79185	23699	29.9	42467	53.6	148	0.2	1875	2.4	6144	7.8	4852	6.1

B7 – Vulnerability to House Fires – Data calculated from people 75 or over who are prescribed oxygen.

Region	count of vulnerable people	Area (sq km)	vulnerable people per sq km	Estimated Population mid-2017	vulnerable people per 1000 population
Surrey	693	1662	0.417	1185321	0.585
Elmbridge	57	95	0.600	136,379	0.418
Epsom and Ewell	39	34	1.147	79,451	0.491
Guildford	65	271	0.240	147,777	0.440
Mole Valley	46	258	0.178	87,128	0.528
Reigate and Banstead	92	129	0.713	146,383	0.628
Runnymede	57	78	0.731	86,882	0.656
Spelthorne	78	45	1.733	99,120	0.787
Surrey Heath	55	95	0.579	88,765	0.620
Tandridge	68	248	0.274	87,297	0.779
Waverley	80	345	0.232	125,010	0.640
Woking	56	64	0.875	101,129	0.554

Appendix C

Modelled response times in Surrey Borough/Districts – Data from internal modelling

The impact of our proposed change to response times to incidents varies by Borough and District, by the day of the week and the time of day. There are many factors that affect how quickly we arrive at an emergency, such as the amount of traffic on the roads and the location of our nearest available fire engine. To give the most accurate comparison, we have looked at the time it takes us to arrive at an emergency under ideal conditions now, against the time it will take if we go ahead with our preferred proposal.

Appendix C1 shows critical incident response comparisons between the proposal versus the status quo.

Appendix C2 shows all incident response comparisons between the proposal versus the status quo.

To understand the impact that the proposed changes to crewing patterns will have on the communities that they serve, response time data must be analysed.

There are three data sets available for use in this analysis:

1. Modelled response times *under the proposed Plan*, assuming full wholetime appliance availability, and on-call availability based on historical performance.
2. Modelled response times *under existing crewing systems*, assuming full wholetime appliance availability, and actual on-call availability.
3. Historical actual response times over the past 5 years.

In each of these sets, there is data available on critical incidents and all incidents. In recent years, our crewing system has been under-established, in large part due to lack of recruitment as a result of constrained finances. Therefore, the reality of what has been available has been significantly different to what would be available if full crewing had been available. Under the proposed plan, restructuring of the available firefighter workforce would allow crews will be much closer to the full planned established. However, as the proposals change the details of SFRS's planned response, compared to our previous plans, it is important to compare the planned response, and not the proposed plans compared to the historical delivery.

Modelling data suggests that there will be varying impacts on response times, depending on the area in question, the time of day, and the day of the week. It should be noted that modelled based on set average road speeds. They do not reflect the speeds under blue light conditions that fire appliances would ordinarily respond under, so the time taken to respond may, in reality, be faster.

Overall the modelling suggests that response times to *critical* incidents will increase from our base model to the proposed model under the Plan by 12 seconds overall, up from 07:22 minutes to 07:34 minutes. This is an average across all times of the day and week. The daily breakdown is as follows:

- The weekday day time response will remain the same (07:23 minutes).

- The weekend day time response will improve by 12 seconds from 07:26 minutes to 07:14 minutes.
- Night time response (any day of the week) time will increase by 38 seconds from 07:18 to 07:56 minutes.

Furthermore the modelling suggests that response times to *all* incidents will increase from our base model to the planned model by 12 seconds overall, up from 07:28 minutes to 07:40 minutes.

This is an average across all times of the day and week. The daily breakdown is as follows:

- The weekday day time response will remain the same (07:27 minutes).
- The weekend day time response will improve by 12 seconds from 07:35 minutes to 07:23 minutes.
- Night time response (any day of the week) time will increase by 38 seconds from 07:26 to 08:04 minutes.

However, the increased community and business safety work will reduce the likelihood of emergencies happening in the first place, so there will be less occurring as a result. In further mitigation, we are introducing improvements that will reduce the time it takes between a call coming in and our firefighters leaving the station. We believe this will help us to get resources to the scene of an emergency more quickly. We are also introducing technology that will improve our measurement of this will tell us if we are being successful.

Appendix C1 – Critical incident response times modelled under the proposal outlined in the Plan in comparison to the current modelled situation. Modelling based on 100% wholtime availability and actual on-call availability.

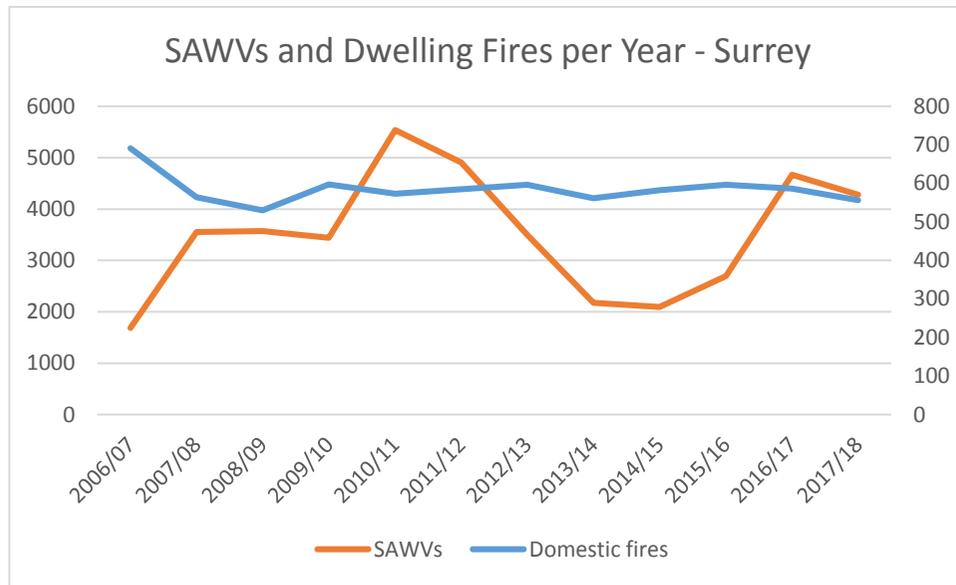
Weekday			Weekend Day		Night		All times of day	
Borough/District	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance
Elmbridge	05:54	05:54	05:47	06:55	07:46	06:59	06:33	06:27
Epsom and Ewell	05:45	05:44	05:39	05:38	05:41	05:26	05:43	05:36
Guildford	07:16	07:17	07:06	07:05	07:23	06:47	07:17	07:04
Mole Valley	08:10	08:10	08:12	08:13	08:06	07:59	08:09	08:07
Reigate and Banstead	07:29	07:29	07:17	07:19	07:57	07:14	07:37	07:22
Runnymede	06:30	06:30	06:03	06:06	08:04	05:56	06:59	06:13
Spelthorne	06:34	06:35	06:31	06:41	07:24	06:42	06:54	06:39
Surrey Heath	07:40	07:42	07:36	07:37	07:53	07:28	07:44	07:36
Tandridge	11:38	11:33	10:24	10:34	10:58	11:03	11:10	11:11
Waverley	08:39	08:39	08:54	09:26	09:15	09:05	08:55	08:56
Woking	05:53	05:53	06:00	06:01	06:19	05:41	06:04	05:50
ALL DISTRICTS	07:23	07:23	07:14	07:26	07:56	07:18	07:34	07:22

Appendix C2 – All incident response times modelled under the proposal outlined in the Plan in comparison to the current modelled situation. Modelling based on 100% wholtime availability and actual on-call availability.

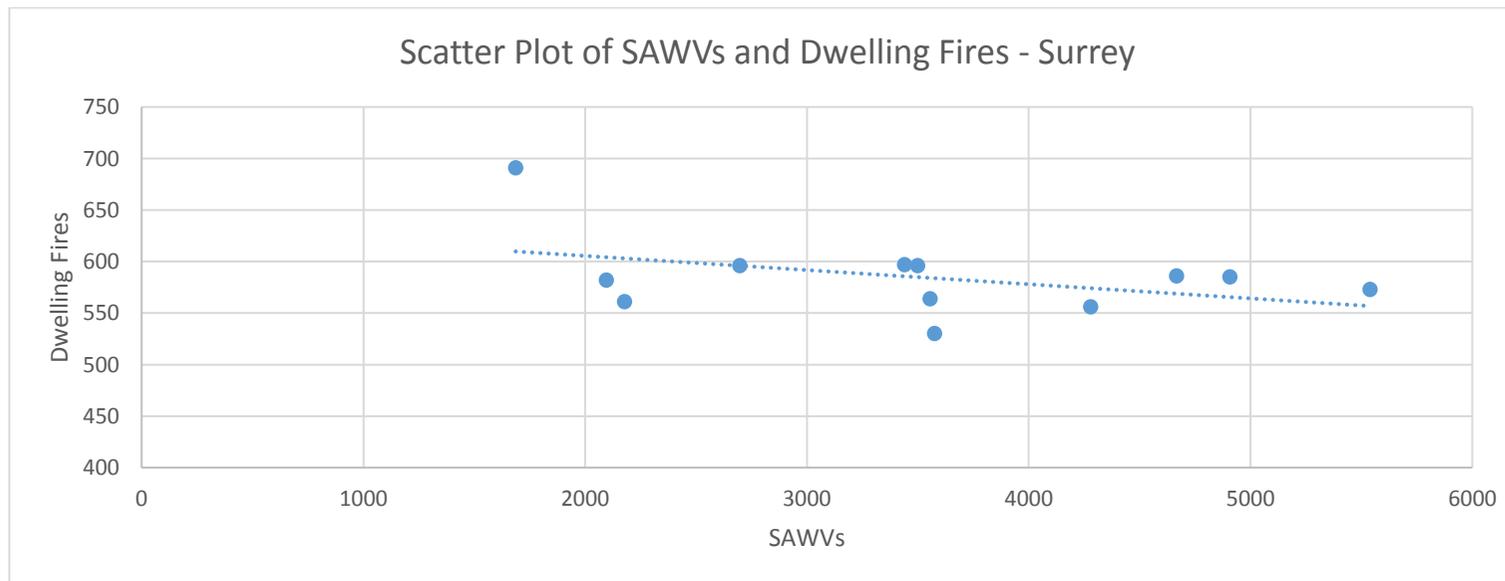
Weekday			Weekend Day			Night		All times of day	
Borough/District	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	Proposed arrival time of 1st appliance	Current arrival time of 1st appliance	
Elmbridge	05:53	05:52	05:49	06:53	07:49	06:59	06:34	06:26	
Epsom and Ewell	05:39	05:38	05:41	05:41	05:58	05:39	05:47	05:39	
Guildford	07:26	07:27	07:26	07:26	07:47	07:01	07:34	07:17	
Mole Valley	08:16	08:16	08:13	08:13	08:09	08:00	08:13	08:10	
Reigate and Banstead	07:23	07:23	07:18	07:19	07:57	07:16	07:35	07:20	
Runnymede	06:33	06:33	06:15	06:19	08:06	06:04	07:04	06:20	
Spelthorne	06:29	06:30	06:31	06:41	07:28	06:45	06:54	06:38	
Surrey Heath	07:54	07:56	07:52	07:53	08:04	07:40	07:57	07:50	
Tandridge	11:42	11:39	10:47	10:51	11:05	11:04	11:17	11:17	
Waverley	08:54	08:55	08:58	09:34	09:24	09:13	09:05	09:08	
Woking	05:53	05:54	06:03	06:04	06:18	05:39	06:04	05:50	
ALL DISTRICTS	07:27	07:27	07:23	07:35	08:04	07:26	07:40	07:28	

Appendix D – Graphs of Safe and Well Visits and Dwelling Fires in Surrey.

D1 – Line Graph of Safe and Well Visits and Domestic Dwelling Fires per Year.



D2 – Scatter Plot of Safe and Well Visits and Domestic Dwelling Fires.



A statistical analysis of the relationship between numbers of SAWVS and Dwelling fires using correlation coefficient produces a result of -0.423319. This is a weak to moderate negative linear correlation.

Communities, Environment and Highways Select Committee



19th September 2019

Waste Task Group Findings

Purpose of report: To inform the Select Committee of the outcome of the work of the Waste Task Group.

Introduction

1. The February meeting of Cabinet agreed to establish a Waste Task Group (WTG) with a remit to explore issues relating to the following:
 - The cost, operation and management of the network of Community Recycling Centres (CRCs) in place across the County,
 - Improving overall recycling performance, and
 - Developing the Council's response to DEFRA's draft Resources and Waste Strategy, published in December 2018.

2. This report brings together the findings of the WTG based on an approach that included a number of visits to key Council waste facilities, meetings with key partners including district and borough councils, and evidence submitted by potential delivery partners including local charities offering reuse and recycling services to Surrey residents.

Key Findings

3. The full report of the Waste Task Group is included as appendix 1 of this report.

4. The report has four key sections focusing on the following:
 - **Understanding the current context of waste management across Surrey.** In this section the report looks at how waste management services are organised, how it performs and what it costs. It also includes a brief summary of some examples of how the council has tackled waste minimisation. Finally, it also explores the

challenges facing this sector in the form of the draft Resources and Waste Strategy 2018.

- The main findings of the WTG are set out in the section entitled **Recommendations** and includes a firm recommendation to retain all existing CRCs, that charges for wood and rubble should be removed, and stronger messaging about the role of waste minimisation.
 - There are a number of specific recommendations in respect of improving kerbside recycling performance and set out an argument for improving the work delivered jointly with the district and boroughs via the Surrey Environmental Partnership (SEP).
 - The final tranche of recommendations look at scope for delivering operational and cost improvements by developing services for third parties, such as local businesses and other public sector organisations, such as academy schools.
5. Section 7 of the WTG report sets out a limited number of specific proposals that would help reduce the overall cost of managing the network of CRCs.
6. The section of the report titled **Discussion** seeks to draw out wider opportunities and challenges the service to be more pro-active in a number of areas including:
- Working with the voluntary sector
 - Working more closely with schools
 - Being prepared for changes being signposted in the DEFRA Resources and Waste Strategy consultation outcomes.

Recommendations

7. The WTG report sets out 12 key recommendations under the following four headings:
- Changes at Community Recycling Centres
 - Scaling up waste reduction, reuse and community composting
 - Raising recycling and its quality
 - Services to Business and other public sector organisations

8. The report also backs up its findings by exploring best practice across four case studies covering: bicycle refurbishment, furniture reuse, community composting and 'baby bank' reuse.

Conclusions

9. The Waste Task Group has published a report setting out a series of recommendations, and advice across a range of key waste management issues that affect both the cost of managing waste and how the County Council and the district and boroughs performs in terms of recycling.
10. The report concludes that the measures, as set out in the WTG recommendations, would ensure that the council's approach to managing waste has a stronger, more environmentally friendly approach based on prioritising waste reduction and reuse. Furthermore, it encourages the council to adopt bolder targets in respect of recycling performance and waste minimisation

Recommendations:

11. To note the recommendations of the findings of the Waste Task Group.

Next steps:

No Further Actions Required.

Report contact: Alan Bowley, Interim Head of Environment, Community Protection, Transport & Environment Directorate

Contact details: alan.bowley@surreycc.gov.uk

Sources/background papers: None

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ITS NOT WASTE!!

The report of the Waste Task Group

September 2019

Membership of the task group:

Cllr Andrew Povey (Chairman)
Cllr Jonathan Essex
Cllr Beryl Hunwicks (Woking BC)
Cllr Mark Nuti
Cllr Becky Rush
Cllr John Beckett (part)

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1.BACKGROUND

Surrey County Council (SCC) has had increasing budget pressures over recent years, mainly due to a combination of reducing central government finance and increasing demand, particularly for Adult Social Care and Children’s Services. This has resulted in significant reductions in the budget for waste management.

In 2018, SCC, at the instigation of the then Leader, consulted the public on options to close either four or six of the smaller Community Recycling Centres (CRC) as a possible way of saving around £1m from the total waste management budget of approximately £68m.

Following petitions received by the Council alongside objections made by many County Councillors, the Cabinet, now under a new leadership, decided in Feb 2019 to postpone the decision on closure and to set up this Task Group with a remit (see **appendix one**) broadly to find alternative savings, to increase the recycling rate and to set out a waste strategy going forwards especially in the light of the DEFRA consultation paper –

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

Appendix two gives a very brief summary of the DEFRA consultation paper.

Subsequently, SCC has demonstrated its commitment to preserving the environment by declaring a ‘Climate Emergency’ and is producing an environmental charter for Surrey and specific proposals for SCC to become carbon neutral by 2030. The charter will include commitments cutting across all of the council’s services including waste management. Our future policy on how SCC handles household waste will need to reflect this commitment.

In addition, the Surrey 2030 vision emphasises the importance of working in partnership with Surrey district and borough councils and waste management is an area of work in which this is particularly important.

Surrey’s Community Vision for 2030 contains the ambition that:

Residents live in clean, safe and green communities, where people and organisations embrace their environmental responsibilities

This is particularly important to people reducing unwanted materials and recycling to the maximum.

2.INTRODUCTION

The Task Group was set up with cross party representation and included the then chairman of the Surrey Waste Partnership, now renamed the Surrey Environmental Partnership, (SEP) **Appendix three** gives an outline of the purpose and objectives of this group.

All of Surrey's district and borough councils, together with selected relevant town and parish councils, voluntary bodies and commercial organisations were invited to give evidence to the Task Group. Various industry reports were circulated to the group and financial spreadsheets giving the breakdown of costs of all the CRCs were provided.

A selection of voluntary sector reuse organisations were invited to present to the Task Group to explain their work. The case studies presented exemplify what they achieve and the potential to extend such activities.

Members of the Task Group were invited to visit some of the CRCs and individual members made visits to other facilities.

3.CURRENT SITUATION

It is very clear that there is much good practice in Surrey.

Separate food waste collections were introduced in Surrey by the districts and boroughs from 2010 with financial support and encouragement from the County Council. This has significantly taken a lot of the food waste into a separate waste stream.

In 2009 SCC decided that it would not support a large scale EFW plant in the county of Surrey. Instead Investment was directed towards an Ecopark, this would consist of a smaller-scale gasification plant and an anaerobic digester plus an education centre in Shepperton as well as recycling bulking facilities at the four largest CRCs. At the same time a recycling target of 70% by weight was set. Central government imposed a landfill tax on a rising scale (over time) to encourage more recycling and to discourage landfill.

The current breakdown of how SCC manages its household waste is set out in **appendix four**. **Appendix five** provides the relative costs of different waste management options. Some of these figures are subject to change with market pressures.

Waste disposal by landfill or incineration at about £110 per tonne is the most expensive option for treating and disposing of waste.

Recycling costs vary depending on the quality of the recyclate (how well it is separated and its level of contamination). For example, if paper is collected separately from other materials it has a higher value, and heavily contaminated loads may not be able to be recycled at all and will instead be sent for disposal.

Waste reduction and reuse of material/goods removes waste from the waste stream completely which avoids the cost of waste management from the council and therefore the taxpayer.

For many years SCC has sought to encourage waste minimisation, re-use and recycling. All eleven districts and boroughs operate kerbside recycling schemes but they differ in their approach. Around 80% of municipal solid waste is collected by kerbside collections. The recycling rates across the collection authorities are given in **appendix six**. The Districts and Boroughs also operate chargeable services for garden waste and large 'bulky waste' items (e.g. sofas). Much of this could be reused or recycled. The charges for bulky waste vary from council to council across Surrey.

There are also a range of voluntary sector organisations that share, reuse, repair and recycle household items across Surrey. These include furniture reuse, bicycle repair, reuse of baby items, libraries of things, toy libraries and repair cafes. SCC supports the Surrey Reuse Network and provides reuse recycling credits.

Community Recycling Centres

In addition, there are 15 CRCs across Surrey with a wide range of capacity, **appendix seven** lists this. There are also small collection points serviced by the district and borough councils (known as bring sites) often sited in car parks. Some of these are charity collection points for textiles and shoes.

DEFRA Resource and Waste Strategy 2018

The overall purpose of the DEFRA draft strategy is to maximise the value of resources we use, minimise the waste we create, cut emissions and help create a cleaner, greener, healthier planet. The goal is to move to a more circular economy which keeps resources in use for longer - for that to happen we must all reduce, reuse and recycle more than we do now.

The *specific* proposals in the recent consultation papers include:

- The possibility of central government regulating which materials will have to be collected by waste collection authorities. This may include garden waste and authorities may not be able to charge for this service. This would remove a considerable tonnage from the CRCs.
- A deposit return scheme (DRS) is also likely to remove bottles from the waste stream, as they will almost certainly be collected at points in supermarket car parks.
- The proposed levy on packaging that would be payable by manufacturers to cover the cost of disposal would encourage manufacturers to minimise packaging or possibly to set up their own recycling scheme. This levy is proposed to come to local authorities which could finance improved services.

- Extra charges could be made on plastic that contains less than 30% recycled material.
- A requirement for business to sort their waste and recycle may also be introduced.
- The final details and timescales for implementing these proposals is not yet clear.

4. LOOKING FORWARD

There is a clear imperative to minimise waste, improve the recycling rate and scale-up re-use. This is worthwhile on cost grounds, environmental and climate impacts and social benefits.

Surrey residents are generally very supportive of initiatives that help the environment and have demonstrated their desire for easily accessible CRCs.

Indeed it is felt that improvements to waste management services that give our residents the help that they desire to improve local opportunities to share, repair and reuse, compost and recycle as much as possible are popular whilst delivering social, environmental and economic benefits both to the council and more widely.

The current trial at some sites that discourage the public from bringing black bag rubbish to the CRC needs to be re-examined. Experience suggests that a large percentage of black bag rubbish can in fact be recycled. This illustrates the lack of knowledge or possibly confusion in the public mind.

Residents who currently make a trip to a CRC with a mixed load of materials end up frustrated when only part of it can be accepted. This tends to discourage responsible behaviour if residents give up on recycling as a result.

5. RECOMMENDATIONS

SCC should commit to a strong, environmentally friendly policy with respect to how it handles unwanted household materials. It could seek to be the local authority with the highest recycling performance and the lowest tonnage of residual waste per capita in the country. A new vision recognizing the importance of the circular economy needs to be supported by investment and a strong consistent marketing campaign.

Changes at Community Recycling Centres

1) All current CRCs should be kept open.

The public is appreciative of these and they should form a vital part of our core service offer to provide local facilities to support and encourage recycling and re-use and avoid the higher cost and environmental impact of disposal of waste.

Furthermore, measures need to be taken to enhance the service offerings at the CRCs under threat, where possible.

In the case of Warlingham CRC it is reasonably close to the Caterham CRC. Both have capacity issues and they could be viewed as a whole with a suite of services offered across both of them. For example, one could accept wood and one rubble, and one could have a reuse shop and one a storage area for large bulky items.

2) Some sites may be sufficiently valuable for development that the Council should consider whether giving up a site and re-providing it nearby would be financially viable with a net gain for the Surrey taxpayer.

3) **Charges for small quantities of wood and rubble should be discontinued** as it is causing confusion to the public, this would allow the smaller sites to take these materials and a more consistent approach makes it easier for the public. Both these materials have some value, for example, wood chip as a fuel and rubble for hard core or foundations.

4) The re-use shops at CRCs should be reviewed after one year's operation and if the current model is successful then consideration should be given to expansion and improved profitability. The contribution from these shops in 2019/20 is £200k per annum. The option of delivering these via Surrey's voluntary sector should be considered.

5) A rebranding of the CRCs should be considered. The title Community Recycling Centre is longwinded and not well used. People still call them the 'tip' or the 'dump'. One possible suggestion is to build on the Drive Smart campaign and use the term 'Waste Smart'.

Scaling-Up of Waste Reduction, Reuse and Community Composting

6) **A clear, consistent message to the public is required.** An ongoing public education/information campaign is essential to maximise waste reduction, reuse and recycling. This could include:

- Bringing all share, reuse and repair organisations under the umbrella of the Surrey Reuse Network, supported by SCC.
- Better promotion of reuse across Surrey including advertising reuse organisations.

- Encourage the district and borough councils and private landlords to include a commitment to recycling in tenancy agreements. Council procurement contracts could also include environmental obligations.

7) The voluntary/charity sector plays a key role in the reuse of larger items. Better links between these organisations and SCC would strengthen this contribution. There is a social benefit in some of the current work e.g. bicycles being repaired at a prison, volunteers securing long-term employment and household goods being provided to disadvantaged households (*see case studies in section 6 of this report*).

Raising Recycling and its Quality

8) The range of recycling rates achieved by different boroughs and districts is quite wide (appendix six). The Surrey Environmental Partnership needs to be turbo-charged to improve performance in terms of both participation rates and rates of recycling of different types of waste. The SEP annual plan and performance should be scrutinised by the Communities, Environment and Highways SCC select committee. This would deliver strong financial benefits to both SCC and the district and borough councils.

9) The collection authorities vary as to what materials they collect and their contractual arrangements; the SEP could usefully encourage a more common approach and all contractual arrangements should incentivize recycling. A more consistent approach across the whole county will raise the quality and quantity of recycling. Reigate and Banstead Council add value by having a separate paper collection. This paper has a higher value and its separation also increases the revenue generated by the dry mixed recycling.

Most councils operate bring sites, mainly for textiles, shoes and small electrical items. A more consistent approach to bring sites across Surrey would be beneficial.

Street bins provided by councils should incorporate recycling bins that are clearly marked for that purpose.

Targets for improved increases in recycling rates should be set. A 1% increase in recycling rate would save around £230,000 a year to SCC. The payments for recycling that are currently paid to the districts and boroughs should be re-examined to increase the incentive. This could move performance towards the 70% target.

Consideration should be given as to whether SCC should invest in its own materials recycling facility (sorting plant) as a means of improving the value and quantity of recycle.

10) Commercial Services to Business and other Public Service Organisations should be investigated and pursued including the following.

Guildford Borough Council offers a service to local businesses in the town. This waste is transported to Slyfield and SCC receives a payment for this. This model could be replicated elsewhere.

11) The CRCs are not at capacity in the sense that more material could be processed through them, the limiting factor would be the rate at which materials can be collected and moved on to the next stage and/or the current waste licence. A paid-for service to schools and small businesses could be provided that would take up capacity at the CRCs and defray part of their cost.

In effect the CRC assets are currently underutilised. The tonnage passing through the CRCs has dropped by about 80,000tpa over the last few years so there is considerable capacity.

12) Private waste disposal companies operate throughout Surrey. There is scope for more working together. Household waste at 0.5m tonnes per annum is a small component of the total waste produced in Surrey (3.7million tonnes per annum (mtpa), commercial waste 0.68 mtpa, construction, demolition, excavation waste 2.5mtpa).

6.CASE STUDIES

6.1. Bicycle Refurbishment

The Bike Project, Guildford

Established in 2012 as a social enterprise to *'help and support a sustainable route out of poverty in two former council estates'*. Used redundant Guildford BC workshop and 2002 long-wheel base transit. SCC provided a £7k grant for tools. The launch was promoted by Surrey Matters. Second outlet now run in Surrey CC youth centre in Walton-upon-Thames. Run as a trading arm of Surrey Lifelong Learning Partnership who aim to deliver adult learning in communities. Now financially sustainable but need grant funding to shadow management as founder retires. Need secure tenure of low-cost workshop/storage space.

Operations. We have 9 workstations and refurbish around 20 bikes a week in a depot and then sold in a shop. All recycling of other bikes/parts is done in-house. Collection is around 15 miles around Guildford (add mid and west Surrey). Bikes Revived cover East Surrey (but are less able to collect). Carry around bike servicing and deliver training. Could extend to do children's bike but that would require more space. Could reuse twice as many bikes.

Staff and volunteers. Currently 2 staff and 37 volunteers. Also deliver City and Guilds level 2 cycling qualifications to year 10 and 11 students.

Sales. One third sold to enable access to work/college. Rest locally and to university students. Key message: *'this is the preferred way to dispose of your pre-loved, no longer used bike'*

Recycling of tyres is a problem as current recycling technology focuses on car tyres.

6.2 Furniture Re-use

Guildford Furniture Link

History. Established in 2010, previously part of Guildford Action for Families.

Location. Furniture Link has moved three times in the past five years to keep running costs as low as possible. Currently have a 5-year lease, 3000 sqft Unit at Merrow Business Park, Guildford.

Staffing. 6 staff (4 full time and 2 part time). Five volunteers are now employed.

Logistics. A van is used five days/week with around 100 collections, deliveries, house clearances and small home moves. Operations need to generate £16-£17k income per month to break even. Warehouse is open to all. Contract for returns from John Lewis.

Helping those in need. 50% discount to any person receiving benefits on our already low price of furniture. Work closely with local councils (including family support workers) and have a high number of referrals from other charities. Establishing own fund to help clients in extreme cases.

Promotion. www.furniturelinksurrey.co.uk, Instagram (Furniturelink2010), Facebook (Furniturelink surrey). Leaflets to connect with other charities etc.

Impact. Divert ~7.5 tonnes from landfill and receive ~£370 a month of reuse credits from SCC.



6.3. Community Composting

Tatsfield Community Composting Centre is a volunteer run service that has been operating for about 15 years.

The centre accepts residents green garden waste (wood diameter less than 3cm) and puts it through a process of shredding, storing in bins, natural heat production and turning to produce compost ready to be sold for use. This total process takes about a year.

The set-up costs included a shredder (£10,000), about 40 bins (£50 each) and three receiving bays. There is a shipping container for storage of equipment and tools.

The centre is run entirely by volunteers (approx 15) plus a workforce of local students on the Duke of Edinburgh programme.

It is open from the first Saturday in April until the last Saturday in September. Some volunteers work in March and October in setting up and shutting down.

20,000 litres of compost are made per year which is sold as a contribution to costs. Some small grants are received each year.

The benefits of community composting are:

- Dealing with waste locally - reduced car use, reduce green waste cost to the council.
- Social - volunteer led, alleviating loneliness and isolation.

Community composting at Tatsfield.....



6.4 Baby Bank Reuse

Stripey Stork – Reigate-based “Baby Bank”.



Stripey Stork are – a Reigate-based baby bank. Since 2013 Stripey stock have distributed goods with a value of over £2.5m to meet over 7500 requests for help.

“Both the Centre and our families are truly grateful for the amazing service you provide.” Red Oak Sure Start Centre, Merstham (March 2019)

- Reigate-based baby bank based in a 4000 sqft warehouse
- There are 6 part time staff, 50 regular and a wider pool of 100 ad hoc volunteers
- The team respond to 50-60 requests a week for help from over 400 referral partners. Rely on grants and our own fundraising.

Proven model now aiming to become a Surrey-wide service. We want to focus on servicing areas that we believe would benefit most and build relationships with



7. Potential Cost Savings Identified at the CRCs

1. The reuse shops have proved successful but income and profitability could be improved by the use of volunteers in the reuse shops as opposed to paid staff. This could be achieved by a charity managing the shops (potential saving £40k - £70k).
2. The use of Electric Machinery at CRCs (as opposed to diesel powered) has been suggested as cheaper and environmentally better.
3. Vans that wish to visit the CRCs require a permit. At present these are issued free of charge. Whilst there needs to be a clear message to the public to encourage reuse and recycling it was felt that a charge for the van permits was reasonable (potential contribution £100k - £200k).
4. The house and grounds at the Charlton Lane site is largely unused and apparently cannot be used for residential purposes. It could be used for small businesses, in general there is a shortage of single rooms for small businesses (potential contribution £50k).
5. Local composting centres to reduce the cost of processing green waste.

8. Discussion

There needs to be a consistent and simple message to the public that residents should aim to minimise waste, maximise reuse and recycling. It must be made easy for citizens to do this. The provision of kerbside collections, bring sites and CRCs provide the opportunity for this.

In addition, the voluntary sector can help with e.g. bicycles, furniture etc but these organisations need a much higher profile and SCC can help with this. Many of these voluntary organisations also provide social benefits e.g. by helping people back into work and providing work experience.

Educating children about reuse and recycling is a great way of influencing adults. There could be a better offer to schools in terms of educational materials, visits to the education centre at the EcoPark and the offer of compost bins/food digesters. Schools do not in general separate out their waste, a paid for service allowing them to take to the CRCs may be of interest.

Fly tipping is a criminal offence but still occurs regularly across Surrey. Unfortunately, the public makes a connection between a perceived increase in fly tipping and the reduction in opening hours at the CRCs. In general, this is not felt to be valid. Emphasising the means of householders to send large items to reuse organisations will help with this.

Community composting could be a way of reducing the cost of dealing with green waste. It also has the benefit of being local and reducing transport costs and the environmental cost. A relatively modest capital investment is required but ongoing costs are very low.

The impact of the DEFRA proposals may alter the composition of material collected at the kerbside e.g. more garden waste (if it becomes a free service) but less plastic if this goes to deposit return banks. The value of used plastic may increase if new plastic has to include 30% recycled material. The quantity of packaging may decrease due to the producer responsibility charge.

The requirement on businesses to separate their waste and recycle is an opportunity to offer a paid for service via the CRCs to help cover the overheads.

Some of the funds raised by Central Government charges on manufacturers will be given to local authorities to help meet the cost of waste management.

The decisions to reduce the availability of recycling centres were deeply unpopular with Surrey residents. There is a compelling case, having declared a climate emergency to take a more environmentally sensitive approach. It is essential to make it easy for residents to choose the best environmental option.

A culture change is required to embrace the circular economy, to view unwanted items as materials with an ongoing use rather than 'waste' which implies no value.

The mantra of reduce, reuse, recycle is still a strong message and fits well with the Community Vision for 2030.

It's not waste!

Appendices

1. Terms of Reference of the Task Group
2. Summary of the DEFRA consultation
3. Purpose and Objectives of SEP
4. Disposal Tonnages by Type of Disposal
5. Relative cost of Disposal
6. Recycling Rates by District and Borough
7. Current CRCs in Surrey and their Coverage

Terms of Reference

Waste Task Group

Chairman:	Andrew Povey.
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Objective of Task Group:

The objective is to review the current waste strategy and include but not limited to the following:

Supporting our Network of Community Recycling Centres (CRCs)

- Review of the CRC operation looking at costs and how they are operated.
- Review the recommendations from the Cabinet paper of January 29th with particular attention on the operational changes
- What savings can be achieved and still support maintaining all CRC's in some format

Delivering Improved Recycling Performance

- Surrey wide kerb side collections and recycling performance by District & Boroughs.
- Review the relationship with District & Borough's and the Surrey Waste Partnership.
- How is the service going to educate the public on waste and what are the best
- The role of communities in managing waste. Engaging with residents to promote waste minimisation, reuse and recycling. methods

The Future of Waste

- Review the Government waste and resource strategy and the implications for Surrey
- Options for dealing with recyclable material in light of the National Waste and Resources Strategy: e.g. creation of Surrey materials recycling facility
- Options for dealing with non-recyclable municipal waste beyond the end of the Suez contract in 2024.
- The role of businesses as producers, users and processors of packaging material.
- Encouragement of local businesses to use waste as a resource and create local markets for reuse or recycling of waste materials e.g. 'upcycling'.

Approach:

- Secretary support will be provided by democratic services.
- Initially to set out a timetable to chart actions and time plan
- Call for written evidence from wider stakeholders & industry by end of February
- Invite selected stakeholders to present their view, comments or ideas by mid-April
- Review opportunities to work with the private sector.
- Collect evidence under emerging themes / work streams by end of April
- Initial recommendations and action plan to portfolio and Director of Environment by May
- Report to select committee in September 2019
- Cabinet to consider recommendations in October 2019

Invitees and attendees of this meeting should be aware that the notes of this meeting, inclusive of names, may be made publicly available under the Freedom of Information Act 2000, or the Data Protection Act 1998.

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Appendix 2 Summary of Defra Consultation



Resource and Waste consultations and Plastic Packaging Tax consultation announced

Today DEFRA have published three consultations on reforms proposed in their Resource and Waste Strategy and a consultation on Plastic Packaging Tax.

DEFRA are very interested in your views and welcome your responses to one or more of the consultations. **Please note the three Resource and Waste consultations will close on 13th May 2019 and the Plastic Packaging Tax consultation will close on 12th May 2019.** In the meantime, if you have any questions please get in touch using the email addresses below.

You can respond to these consultations and view the complete consultation documents via the following links:

All four consultations can be found here:

<https://consult.defra.gov.uk/environmental-quality/resource-and-waste-and-plastic-packaging-tax-consu-1>

Consistency in Household and Business Recycling Collections in England:

<https://consult.defra.gov.uk/environmental-quality/consultation-on-consistency-in-household-and-busin>

Reforming the Packaging Producer Responsibility System:

<https://consult.defra.gov.uk/environmental-quality/consultation-on-reforming-the-uk-packaging-produce>

Introducing a Deposit Return Scheme (DRS) for England, Wales and Northern Ireland:

<https://consult.defra.gov.uk/environment/introducing-a-deposit-return-scheme>

Plastic Packaging Tax:

<https://consult.defra.gov.uk/environmental-quality/plastic-packaging-tax>

All consultations will close at 23:59 on the specified closing date.

Below is a short overview of each consultation:

Consistency in Household and Business Recycling Collections

Government is committed to meeting a future municipal recycling target of 65% by 2035. However, over the last 5 years recycling rates in England have stalled at around 45%. Many local authorities continue to make improvements and have introduced new services but some have seen a drop in their recycling rate and others do not collect a full range of recycling materials. We support frequent and comprehensive waste collections and want to make it easier for householders, businesses and local authorities to recycle. We believe that one way of making recycling easier for everyone is for local authorities and other waste

Appendix 2 Summary of Defra Consultation

operators to collect a core set of materials for recycling. So this consultation seeks views on the core set of materials to be collected. The consultation also seeks views on other measures to increase recycling including free garden waste collections, separate food waste collections, developing non-binding performance indicators for local authorities and alternatives to weight based metrics. We estimate that at the moment around 35% of waste from businesses is recycled but this could potentially increase to 74% with the right measures so we're keen to have your views on the best ways of increasing the amount of recycling from businesses. If you have any questions on this consultation, please email recycling@defra.gov.uk

Reforming the UK Packaging Producer Responsibility System

We have had a system of producer responsibility for packaging in place since 1997, and like any system that is over 20 years old it is in need of reform. This consultation seeks views on measures to reduce the amount of unnecessary and difficult to recycle packaging and increase the amount of packaging that can and is recycled through reforms to the packaging producer responsibility regulations. It also proposes that the full net costs of managing packaging waste are placed on those businesses who use packaging and who are best placed to influence its design, consistent with the polluter pays principle and the concept of extended producer responsibility. In addition, the consultation asks for views on the Government's proposals for recycling targets to 2030 and presents options for the future governance arrangements of a reformed system. If you have any questions on this consultation, please email packaging@defra.gov.uk

Introducing a Deposit Return Scheme (DRS) for England, Wales and Northern Ireland

UK consumers go through an estimated 14 billion plastic drinks bottles, 9 billion drinks cans and 5 billion glass bottles a year. The reported recycling rates are significantly lower than many other major developed economies at around 70%, leaving around 4 billion plastic bottles, 2.7 billion cans and 1.5 billion glass bottles not recycled every year. This tells us that valuable recyclable material is being lost to landfill or incineration - or, worse, ends up in the open environment where it can have a serious impact on ecosystems and local people. This consultation seeks views on proposals to introduce a DRS for drinks containers in England, Wales and Northern Ireland (Scotland has consulted separately, but we are keen that our approach can form part of a coherent UK-wide system). A DRS would see a deposit added to the price of in-scope drinks containers at the point of purchase, which would be redeemed when consumers return their empty drinks containers to designated return points. It is anticipated that a DRS will help reduce the amount of littering in England,

Appendix 2 Summary of Defra Consultation

Wales and Northern Ireland, boost recycling levels for relevant material, offer the enhanced possibility to collect high quality materials in greater quantities and promote recycling through clear labelling and consumer messaging. If you have any questions on this consultation, please email DRS@defra.gov.uk

Plastic Packaging Tax

At Budget 2018, government announced that from April 2022 it would introduce a world-leading new tax on the production and import of plastic packaging with less than 30% recycled content, subject to consultation. Plastic packaging accounts for 44% of plastic used in the UK , but 67% of plastic waste, and over 2 million tonnes of plastic packaging is used each year. The vast majority of this is made from new, rather than recycled plastic. The government's call for evidence last year, which received a record 162,000 responses, highlighted that using recycled plastic is often more expensive than using new plastic, despite its lower environmental impacts. The government wants to shift the economic incentives involved in the production of more sustainable plastic packaging, encouraging greater use of recycled plastic and helping to reduce plastic waste. This complements the government's proposals for reformed Packaging Producer Responsibility regulations. The consultation outlines the government's proposal for how the tax will work and contains a number of questions relating to this. For example, which packaging should be in scope of the tax, how to assess recycled content, and which businesses will be liable for the tax. The government is open to views on the best design options. If you have any questions on this consultation, please email ETTanswers@hmtreasury.gov.uk

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Appendix 3 – Purpose and Objectives of SEP

The Surrey Environment Partnership

The Surrey Environment Partnership (SEP) consists of the county's eleven district and borough councils and the county council. It was originally formed in 2009 as the Surrey Waste Partnership aiming to overcome the challenges of two-tier service delivery and manage Surrey's waste in the most efficient, effective, economical and sustainable way possible.

In April 2019 the partnership name was changed to reflect the growing remit and desire to tackle wider environmental issues in Surrey.

The partnership is currently working towards the aims of three strategies that have been developed over the past 10 years.

Increase recycling and reduce the amount of waste produced, the amount of waste sent to landfill and the cost of waste management.

Reduce the amount of fly-tipping in Surrey.

Reduce the use of single use plastics (SUP) through our roles as employers, service providers and as advocates across the county.

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Appendix 4 – Disposal tonnages by type of disposal

Kerbside collected Waste

Type of waste	Tonnage collected in 2018/19	Destination
Black bag waste	179,235	EFW /Landfill
Bulky waste	1,860	Landfill
Road sweepings	14,152	Recycled
Street cleaning waste	1,009	EFW/Landfill
Leaf fall	1,180	Composting/recycled
Fly tip waste	4,130	EFW/Landfill
Fly tip tyres	28	Recycled
Fly tip asbestos	5	Hazardous landfill
Food waste	37,946	Anaerobic digestion
Greenwaste	68,480	Composting
Mixed recyclables	113,259	Recycling
Totals	421,284	

Waste collected at community recycling centres

Type of waste	Tonnage collected in 2018/19	Destination
Bulky amenity waste	7582	Landfill
Black Bag waste	12551	Energy from waste incineration
Mattresses	1109	Landfill
Asbestos	129	Hazardous Landfill
Batteries	225	Recycling
Books/CDs	158	Reused/recycled
Reuse	230	Reuse- Sold in shop
Mixed cans and plastics	28	Recycled
Cardboard & paper	5673	Recycled
Gas bottles	149	Reuse/recycled
Glass	383	Recycled
Greenwaste	25952	Composted
Plasterboard	250	Recycled
Hazardous waste	64	Recycle/treatment/disposal
Scrap metal	6897	Recycled
tetrapak	1	Recycled
Mobile phones/spectacles/ print cartridges	6	Recycled
Waste oil	197	Recycled
Textiles	1952	Reused/Recycled
Tyres	61	Recycled
Waste electricals	5626	Recycled
Wood	16766	Biomass energy from waste incineration
Rubble and soil	2981	Reuse/ recycled
Totals	88970	

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Appendix 5 - Relative cost of disposal

Type of Waste	Destination	Average cost including transport to treatment/disposal facility (19/20 prices)
Residual waste	Energy from waste/landfill	£118 Per tonne
Food waste	Anaerobic digestion	£35 per tonne
Dry mixed recyclables	Materials recovery facility	£60 per tonne
Green waste	composting	£30 per tonne

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Appendix 6 – Recycling Rates by district and borough

Authority	Total household waste and recycling per person (kg)			Recycling rates						Percentage of municipal waste sent to landfill		
				Joint Strategy Recycling and Recovery rate			Original/Defra Recycling rate					
	Q3 2017/18	Q3 2018/19	Change (%)	Q3 2017/18	Q3 2018/19	Change (percentage points)	Q3 2017/18	Q3 2018/19	Change (percentage points)	Q3 2017/18	Q3 2018/19	Change (percentage points)
Elmbridge	399	385	-3.5%	54.6%	52.2%	-2.4%	53.7%	51.4%	-2.3%			
Epsom and Ewell	373	366	-2.0%	50.3%	54.5%	4.2%	49.4%	53.2%	3.9%			
Guildford	349	336	-3.7%	60.5%	58.2%	-2.4%	59.3%	57.0%	-2.3%			
Mole Valley	380	387	1.9%	60.4%	54.4%	-6.0%	59.3%	52.9%	-6.3%			
Reigate and Banstead	355	353	-0.7%	55.0%	54.3%	-0.6%	54.3%	53.5%	-0.9%			
Runnymede	305	305	-0.2%	45.1%	42.3%	-2.8%	44.6%	41.6%	-3.0%			
Spelthorne	344	337	-1.9%	47.3%	45.7%	-1.6%	46.4%	44.5%	-1.9%			
Surrey Heath	339	333	-1.8%	62.4%	61.8%	-0.6%	62.2%	61.4%	-0.8%			
Tandridge	364	369	1.4%	58.4%	58.1%	-0.3%	58.3%	58.1%	-0.2%			
Waverley	344	357	4.0%	54.7%	57.7%	3.1%	53.5%	55.6%	2.2%			
Woking	368	354	-3.8%	58.9%	57.9%	-1.0%	58.0%	56.8%	-1.2%			
District & Borough Total	357	353	-1.1%	55.6%	54.6%	-1.0%	54.7%	53.5%	-1.2%			
Surrey County Council	76	70	-8.4%	78.5%	81.0%	2.5%	60.0%	61.7%	1.8%			
SCC - CRCs only				76.2%	81.4%	5.2%	57.5%	60.8%	3.3%			
Surrey Waste Partnership	433	423	-2.3%	59.7%	59.0%	-0.7%	55.7%	54.9%	-0.7%	4.6%	9.5%	4.9%

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Community, Environment & Highways Select Committee



19 September 2019

Parking Strategy Update

Purpose of report:

This report seeks the Select Committee's views about changes to the council's on street parking management and enforcement policies including a review of fees and charges for parking related services.

Introduction:

1. The Surrey County Council (on street) Parking Strategy was adopted in 2011 and sets out our policies about on-street parking regulation and enforcement. It has evolved and developed in the years since but it is now time for a more comprehensive update to ensure it is in alignment with the councils '2030 vision' and changes in national legislation.
2. This policy update also looks at the range of charges we or our enforcement agents make for various parking services in light of the Fees and Charges Policy adopted by Cabinet on the 18 December 2018. A key principal of this is that users of discretionary services are expected to pay for the full cost of the service being received rather than the general tax payer.

Overall Objectives of a Parking Strategy

3. Our strategy adopted in 2011 was designed to help shape, manage and deliver the county council's vision for parking. The theme of the strategy was to:

"Provide parking where appropriate, control parking where necessary"

With the following key objectives:

- Reduce congestion caused by parked vehicles
 - Make best use of the parking space available
 - Enforce parking regulations fairly and efficiently
 - Provide appropriate parking where needed
4. These criteria generally still apply however we should also ensure we embrace our key ambitions from the '2030 Vision for Surrey' that are relevant to a parking strategy. These are:
 - Residents live in clean, safe and green communities where people and organisations embrace their environmental responsibilities.

- Businesses in Surrey thrive.
 - Journeys across the county are easier, more predictable and safer.
 - By 2030 we want Surrey to be a uniquely special place where everyone has a great start to life, people live healthy and fulfilling lives, are able to achieve their full potential and contribute to their community and no one is left behind.
- 5 Our more specific parking policies and strategies will need to link to these main objectives to realise the vision for parking and work will be channelled through three main areas:
- Manage on street parking space to ensure optimum use through our parking review process
 - Operation of civil parking enforcement – fair and cost effective with greater use of technology to achieve compliance
 - Promotion of parking controls that can help improve sustainable and greener transport and communities.
- 6 Partnership working with boroughs and district councils will be particularly important in this field, given their role in the administration of civil parking enforcement and off street car parks. Boroughs and districts also work with the county council in their capacity as local planning authorities to develop standards for new development, which can affect parking provision and travel choices.
- 7 Although our current parking strategy was adopted as part of the Surrey Transport Plan in 2011, this update is intended to build on the original strategy and this report consequently discusses new aspects to our parking policies in the following areas:
- Parking Reviews
 - Permit Parking Schemes (aka resident parking schemes)
 - Resident permits
 - Visitor permits
 - Carer and medical permits
 - Business permits
 - Motorcycles
 - Suspensions and waivers on parking restrictions
 - Vehicle immobilisation
 - Disabled Bays
 - Access Protection Markings (APM)
 - Footway and verge parking
 - Parking charges
 - Red routes
 - Camera enforcement outside schools

Parking Reviews

- 8 Parking reviews combine all the agreed changes to parking restrictions in a district or borough over a period of time, (typically 12 to 15 months) so that they can be taken through the statutory process together. This saves time and money. By law it is necessary to place a statutory notice in a local paper to amend or create a Traffic Regulation Order (TRO) for a parking restriction. If carried out in isolation each notice could cost around £800 depending on the size and the paper. A single advert for multiple sites saves thousands of pounds in advertising costs and overall the cost of implementing a typical parking restriction can be reduced from approximately £1000 to £300 by combining them in a review.
- 9 The Surrey parking team carry out parking reviews in ten of the eleven districts and boroughs on a rolling cycle. Each local or joint committee has a review every 15 months (5 cycles). The reviews typically take between 6 and 12 months to implement depending on their size and complexity. Guildford Borough carry out their own reviews following a similar process but on a different time span related to the competing needs of the urban and rural areas of the borough.
- 10 Members are generally consulted through the whole assessment and implementation process. Meetings and site visits with the parking team when preparing proposals for committee are generally helpful in developing the report and when making the decisions about what to implement. The council's scheme of delegation has been amended to allow the post consultation decisions about what to implement to be made outside of committee which saves time.
- 11 The parking team have developed and fine-tuned the review process using feedback from members and the public so that it is now a well understood process and a feature of the local committee calendar.
- 12 The consultation stage makes the most of information that can be provided via our web pages such as plans and we also encourage comments and feedback to be made directly via our web pages for easier processing. The best way of alerting residents and businesses to proposed changes however is still to letter drop (or mail shot) and put up notices/posters where changes are planned. Councillors and our community partnership teams also often use social media to engage residents about the proposals.
- 13 The implementation stages of the review can sometimes be frustrated by bad weather or parked vehicles. A typical parking review can have up to 50 sites and most of the locations are

heavily parked so access for the contractor can be difficult. Lining work is very weather dependant, can't be done in rain or when it's very cold. Some sites also need mechanical sweeping so this is co-ordinated with the boroughs if possible.

- 14 Under our current contract, we only pay for completed work. The arrangement we have with our contractor is that they will make three visits to each site and do as much as they can before we focus more resource to finish off any remaining gaps.
- 15 There are usually one or two locations in every review that are difficult to finish (perhaps where the owner hasn't moved a car for various reasons). In extreme cases we have used a car lifter to move vehicle out the way but this can be expensive and notices still need to be put up in advance.
- 16 If we tried to cone off all the sites in a review in advance we might need 300 cones (a truck load) and the services of a traffic management crew which could cost up to £3000. But there's no guarantee the work would go ahead as planned because of unreliable weather. The risk is similar hiring a tow truck in advance, we can't be certain lining work is possible until a day or two beforehand.
- 17 The system that has been developed allows for the unpredictability of weather and people (and so takes a bit longer) but has the lowest cost.
- 18 However, preparations for the next highway works contract will look at greater traffic management involvement for the contractor as part of the implementation process. We also work closely with the district and borough councils and cooperate to implement new restrictions where possible.
- 19 Parking reviews should typically deal with smaller scale issues and are not intended to be used for introducing anything other than small scale resident or parking management schemes. Larger schemes must be funded separately.
- 20 **Parking Reviews - Proposal**
 - a) The review process has been refined over the last 10 years and there are no significant changes proposed to the process as we believe it is working well.
 - b) The scope of parking reviews should be adjusted to suit the funding available. Where there is no parking surplus or other income to put towards it, the review proposals should only include restrictions that maintain road safety, prevent serious obstruction or essential access to facilities.

- c) Local and Joint Committees should look to introduce on-street parking charging to help improve access to retail areas.

Permit Parking Schemes

- 21 Permit schemes (aka resident parking schemes or controlled parking zones) are usually introduced near town centres or rail stations to help residents park near their homes. The introduction of permit schemes tends to reduce unrestricted free parking and so can help encourage the use of car parks or other modes of transport.
- 22 The schemes are often controversial, some residents and businesses can be very supportive or opposed depending on their outlook and circumstances. Decision making can be very difficult and time consuming for the council in circumstances where opinion is divided. In 2015 we introduced a policy where by when residents request a parking scheme, we want them to demonstrate there is support by submitting a parking scheme petition. We generally require at least 70% of those households who will be directly affected to sign up to the scheme before we will investigate whether to take it forward. This has been successful in reducing requests for residents parking schemes (and the time we spend investigating them) from small groups of residents who do not represent the majority. We do not propose to change this.
- 23 We do however reserve the right to implement parking schemes when there are other transportation initiatives or policies that require some form of parking control and the final decision lies with the traffic authority (SCC).
- 24 Only relatively small permit schemes can be implemented as part of a parking review. Larger schemes tend to be more expensive and resource intensive and take longer so would need dedicated resources and funding.
- 25 Resident permits are current charged at £50 for the first and £75 for subsequent ones issued to the same household. This is the minimum charge under our policy however local committees can set higher figures. The number of permits allocated per household can also be set by the committee depending on the road space available. In many cases we allow households to have permits for all the vehicles they can't park off street. This helps cope with larger households where siblings stay at home longer but does impact on single car households who find it more difficult to find a space.
- 26 Visitor permits are charged at £2 per day and generally limited to 120 per year per household.

- 27 The resident permit charge was set in 2011 to cover administration and enforcement costs but does not now fully recover these or the implementation costs.
- 28 Currently income from resident permits is approximately £500,000 countywide. The district and borough councils who manage the permits schemes collect the income which feeds into each on street parking account.
- 29 Income from visitor permits is approximately £250,000 and business permits £80,000 countywide.
- 30 Taking into account advertising, legal and administrative support it would cost approximately £40K to amend the county wide permit charge so it does not make sense to do it too regularly. A 5% increase in resident permit income would only increase annual revenue by £25,000.

Residential Development in CPZ's

- 31 New developments that increase population density levels within existing permit schemes can often put pressure on street parking availability. It is understandable that larger single properties are demolished to make way for flats and apartments in urban areas but these can increase population density and usually have less off street parking availability per dwelling.
- 32 In some CPZ's there may be road space to accommodate the additional vehicles but in many there will not. As a default position, new residential properties within existing CPZ's should not be permitted on street parking permits. The local committee (as part of a parking review) or Cabinet Member/local planning authority at the planning stage should determine permit eligibility for significant new developments. There may also be an increasing number of 'car free' developments that can be excluded from permit provision in the traffic orders to enforce this planning condition.

Residents Permits - proposal

- 33 Continue to make a charge that covers administration and enforcement costs but also recovers the capital cost of implementing and then maintaining the permit scheme. Allow permit numbers to be set locally to suit circumstances but increase the charge for the second and subsequent permits to reflect the additional road space occupied by a household.
- 34 The cost breakdown for a permit in a typical scheme of say 50 properties would be:
- Setting up permit scheme and maintaining £25 (about 30 minutes officer time per application)

- Enforcement £45 (approximately 1.5 hours per week CEO time)
 - Repayment of Implementation costs and ongoing maintenance £10 (repayment over 10 years)
- 35 Therefore the total charge for a single permit would equate to £80. If each property purchased one permit the installation, administration, maintenance and enforcement costs would be covered. There is further information in Annex 1.
- 36 The charge for subsequent permits could be made higher to discourage excessive on street parking (and encourage off street parking) and deter applications for two or more permits (whilst recognising there are larger households but being able to cater for this eventuality)
- 37 The charge for subsequent permits should be:
- 2nd permit £100
 - 3rd and subsequent £130

Visitor permits

- 38 These are currently charged at £2 for a day regardless of location or the period of time needed. Feedback over the last few years indicates that £2 is quite expensive for visitors who only stay for a short period of time in some area. However it is also quite cheap to park all day in a major town centre location. There is also demand for 'childcare' permits. At the moment many households that have regular childcare visitors must purchase one day visitor permits of which only 120 are available per year. These could be issued to a resident who has regular childcare needs.

Business and Local Worker Permits

- 39 The charge for business permits is currently between £150 and £500 depending on the nature of the permit scheme. The permits are intended for operational use (say for delivery vehicles or estate agents vehicles) but can also be used for staff/employee parking within a permit scheme if that is appropriate. There are often small businesses located in residential areas and their parking needs have to be catered for. We do not issue many business permits, income is approximately £80,000 per year.
- 40 There seems little need to change the current arrangements.

Carer and medical permits

- 41 Carer permits are issued to residents who receive regular visits from carers (who could be family, friends or healthcare professionals).
- 42 Medical permits are issued to healthcare professionals or organisations who regularly need to park in controlled parking

areas to visit their patients.

- 43 The difference between them is that the carers permit is issued to the resident who needs care who then gives it to their visitors while they are parked nearby, the medical permit is issued to the healthcare company or NHS for their staff to carry with them.
- 44 The current charge is £10 for a carers permits and medical permits are free.

Motorcycle permits

- 45 Residents with motorcycles are currently able to apply for permits for their vehicles at the standard rate (£50). Historically it has been difficult to display a paper permit on a motorcycle so uptake has been low and/or it is easier to store them off road. With the increasing use of virtual permits it is easier for motorcycles to comply with permit scheme rules and permits can be charged at the proposed rate for cars.

Permits – Summary of Proposals

- 46 Introduce changes for residents permits, as described in paragraphs 33-37 above, which aims to recover the cost of implementing, administering, maintaining and enforcing permit schemes in Surrey. The charge for additional permits will be set higher to discourage multiple vehicle households while recognising it is a reality.
- 47 All permit charges will be reviewed in line with inflation from April 2022.
- 48 Visitor permits could be made more flexible by offering:
- a) A 3 hour permit for £1, valid in all locations – with a maximum allocation of 300 per year per property
 - b) An all-day permit in 'out of town' locations for £2 – maximum 150 per year
 - c) An all-day permit for larger town centres charged at £3 per day – maximum 150 per year
 - d) A child care permit at the same rate as a resident permit dependent on how many had been issued to the property.
 - e) Greater discretion to allow district and borough enforcement teams to issue more/fewer visitor permits as circumstances allow.
- 49 Remove the charge for carer permits and make no change to the charge for medical permits.
- 50 All permits should be 'virtual' by the end of 20/21 to improve enforcement efficiency and ease of application.

- 51 The default position will be that new developments in existing permit schemes or CPZ's should not be eligible for resident permits. This requirement can be amended by a local committee in a parking review or cabinet member.
- 52 Where permissible, developers of new developments should make a contribution towards the cost of managing on street parking arrangements in the local area if there is likely to be an impact on street parking.

Suspensions and Waivers

- 53 The reasons and processes for granting Suspensions and Waiver Certificates are broadly the same. The difference in deciding which to allow will be based on the particular circumstances of the request and the solution provided. For example does a particular bay require suspending to allow access, or will a Waiver Certificate allow a vehicle to park in the general vicinity of work taking place.

- **Suspensions**

A suspension is where the restriction (Traffic Regulation Order or TRO) allowing or disallowing an act to take place is suspended for a set time period.

- **Waiver Certificates**

A Waiver Certificate is supplied to a vehicle or vehicles' (registration(s)) giving them dispensation to park within an existing TRO restriction.

- **Restrictions**

A restriction can include: a limited wait free bay, a pay and display bay or a yellow line.

- 54 Generally waivers to be used on double yellow lines (no waiting at any time) should not be provided unless there is no other option and a risk assessment has been carried out. Where for example a restriction is intended simply to deter commuter parking, so only a single yellow line, B&Ds should be in a position to agree a suspension / waiver.

Criteria for Considering a Request

- 55 Either a Suspension or Waiver Certificate can be allowed in special circumstances that may include (but are not limited to):
- a) maintaining public or traffic safety
 - b) essential building or maintenance works
 - c) furniture removals (some dispensations already apply in these circumstances)
 - d) filming
 - e) special events

f) weddings or funerals (some dispensations already apply in these circumstances)

56 Before granting either it will be necessary to consider whether any such request is genuine, justified, safe and will not have a prohibitively disruptive effect on the local amenity. Granting of either a Suspension or Waiver Certificate is entirely at the Council's discretion.

Suspensions Issuing Procedure

57 With a Suspension ideally signs will need to be erected some days in advance. Photographs of vehicles parked when suspension signs are erected will enable appeals officers to decide appeals where drivers say they parked prior to the suspension signs going up.

Waiver Certificate Issuing Procedure

58 Ideally for ease and speed of communication these should be issued by pdf document attached to an e-mail. To be printed off and displayed on the dashboard of the vehicle(s) concerned.

Existing Fees (set in 2011)

Table A

	Initial Period	Initial Charge	Subsequent Period	Subsequent Charge
Suspension (each 6m length)	3 days	£65	each additional day	£10
Waiver Certificate (per vehicle)	3 days	£15		£5

Proposed Fees

59 These are shown increased broadly in line with inflation since 2011 to maintain recovery of the cost of providing the service.

Table B

	Initial Period	Initial Charge	Subsequent Period	Subsequent Charge
Suspension (each 6m length)	3 days	£75	each additional day	£12
Waiver Certificate (per vehicle)	3 days	£25		£6

60 Total income is presently around £200,000 per year which would increase to approximately £240,000.

Exemptions

- 61 Local authorities while carrying out statutory duties on the highway and utility companies while carrying out works on the highway are only subject to the initial charge. Local enforcement team should have discretion whether to apply these charges to charitable organisations as part of community events.

Persistent Evader Vehicle Immobilisation

- 62 Some vehicle owners contravene parking regulations deliberately and often, and fail to settle the debts they incur. A vehicle owner can be classed as a 'persistent evader' if there are three or more recorded contraventions for the vehicle and the penalties for these have not been paid, represented against or appealed against within the statutory time limits, or their representations and appeals have been rejected but they have still not paid. Usually this is because the vehicle keeper is not registered, or is not correctly registered, on the Driver and Vehicle Licensing Agency (DVLA) database and the owner is confident that they can avoid paying any penalty charges. Where a vehicle appears to be registered in the UK, but the identity and address is not registered, or is not correctly registered on the DVLA database, we can consider making the information available to the police who can, if appropriate, investigate any criminal offence.
- 63 DfT advice is that when parked in contravention, a persistent evader's vehicle should be subject to the strongest possible enforcement following the issue of the penalty charge notice and confirmation of persistent evader status. This is likely to involve immobilisation or removal. The benefit of immobilisation/removal is that it requires proof of ownership and a registered address before release. Currently, under Traffic Management Act 2004 regulations an authority can only obtain payment for the penalty charge notice of the contravention for which the vehicle is immobilised or removed and not any other outstanding penalty charge notices.
- 64 Removing a vehicle to a pound is more complicated and potentially expensive, we don't have an 'in house' pound and it would be expensive to set one up. Clamping is more cost effective, however the ability to release vehicles at all times of the day/night would need to be carefully considered. Clamping would only be sensible if a vehicle was not parked in a hazardous location.

Persistent evader - proposal

- 65 Develop and trial a persistent evader policy that will enable immobilisation or removal of persistent evader vehicles in conjunction with district and borough enforcement teams.

Disabled Bays

- 66 Under the Equality Act 2010 organisations are required to take reasonable steps to help provide access to shops, facilities and housing. Our policy for providing disabled bays requires that the resident has a blue badge, no off street parking and a vehicle registered at their address.
- 67 We receive about 400 applications for disabled bays each year and install about 250. We also remove about 100 per year. The number of new bays has been rising steadily and could increase further as changes to blue badge eligibility are widened to those with non-visible as well as physical impairment.
- 68 Most of the bays installed are only advisory in residential areas so a TRO is not required and we aim to order their installation within four months of a successful application. If a TRO is needed (because the bay is located in a CPZ or amongst other restrictions) then it makes sense to do it as part of the next parking review. We batch up work orders for signing and lining work to reduce costs which is why there can be a wait for the bay to be installed.
- 69 The cost of assessing a disabled bay application is made up of officer time and road marking/signing costs. The cost of installing a disabled bay including this is £200 for an advisory bay or £400 if a sign/TRO is needed as well.
- 70 Our application process allows residents to download a form from our website and send it in with copies of the relevant documents.
- 71 We provide this service for no charge to the applicant and spend about £60,000 annually. Some authorities make a small charge for this service but it does not fully recover the cost of providing a disabled bay and would increase the complexity of administering the process.

Disabled bays – Proposal

- 72 We should improve our on line application process and allow scanned documents to be uploaded via the website rather than being sent in the post.
- 73 Our current criteria for a disabled bay (a blue badge, no off street parking and a vehicle) seems reasonable. A few other councils request evidence of disability benefits (which are not means tested)

but this seems overcomplicated.

- 74 Disabled bays should continue to be provided for free but where a TRO is required installed as part of a parking review if this is appropriate.

Access Protection Markings

- 75 Access Protections Markings (APMs) are advisory markings used to highlight the presence of private driveways and smaller side roads. Our policy is to only implement them if a driveway is not clearly visible or obvious and we often ask for evidence that there is an obstruction problem. Never the less we process about 500 applications and mark out about 100 of these lines each year and do not charge for the service.
- 76 The cost of assessment and marking out an APM is approximately £50 in officer time and £100 in contractor costs, including travelling time and setting up on arrival. There may also be parked cars in the way requiring a further visit to finish.

Options for APMs

- 77 APMs are an advisory service and if we are to continue providing them we should make a charge as most other councils now do. The other option is to stop doing them all together but we would still need to deal with enquiries and demand for them. It does not seem necessary to have an overly onerous set of requirements for the introduction of an APM which again would mean more administration time on applications.

APMs – Proposal

- 78 A charge of £50 should be made to assess a request for an APM and a further £120 (assuming a successful application) to provide a new APM, to refresh an existing APM or to refresh and extend an existing APM up to 6m long. The criteria should include a properly constructed dropped kerb serving a useable driveway and there must be evidence of street parking nearby. An additional £40 will be charged for double width crossovers between 6 and 12m long or for each additional crossover at the same premises.

Footway and Verge Parking

- 79 Within Greater London there is a blanket prohibition of footway and verge parking. Outside of London, footway and verge parking are not specifically prohibited.
- 80 Since 1974, Highway Code rule 244 has stated that drivers "MUST NOT park partially or wholly on the pavement in London and should not do so elsewhere unless signs permit it.". The key

things to note here are the words *must not* and *should not*.

- 81 In London, you *must not* park on the pavement, the *must* indicating there is legislation behind this rule and you could receive a fine for breaking it.
- 82 However, outside of the capital or “elsewhere”, the Highway Code states drivers *should not* park on the pavement, meaning it is advisory and not, therefore, backed up by any legislation.
- 83 Rule 242 is where it gets a little less clear, stating: "You **MUST NOT** leave your vehicle or trailer in a dangerous position or where it causes any unnecessary obstruction of the road."
- 84 This is a *must not*, again, meaning if your car is reported or seen by a police officer and judged to be either in a dangerous position or causing an unnecessary obstruction of the road, you could receive a Fixed Penalty Notice.
- 85 Local/Joint committees have powers to introduce verge or footway parking bans over small or large areas with the introduction of a Traffic Regulation Order (TRO). ‘Footway parking’ can also be formalised in a similar way but it is likely that engineering measures will be needed to lower kerbs and strengthen the footway where this is done. Utility apparatus may also need to be moved which could be prohibitively expensive. Our existing parking strategy does not allow the formal introduction of footway parking.
- 86 The main drawback to introducing verge or footway parking bans is the cost of installing the required boundary and repeater signs and there is the additional issue of the clutter that they cause, and the main drawback to formalising parking on what was previously footway is the cost of strengthening the area and potentially lowering the kerb.
- 87 On a national level ‘London style’ no parking legislation could be introduced by parliament across the rest of the UK. This could have major implications in some streets because footway parking has become accepted practice due to the number of vehicles and the limited width of many roads. We would prefer to have powers to enforce footway obstruction without a TRO in a similar way to the police but following decriminalised parking procedures in a similar way to other parking restrictions.

Footway and Verge Parking – Proposal

- 88 Local and Joint committees can formalise ‘footway parking’ where it is safe and there is enough space for pedestrians, subject to making a TRO and adjusting the kerbs and footway strengthening as necessary.

- 89 Local and Joint Committees can implement verge and footway parking bans with a TRO.
- 90 The Council should continue to oppose footway and verge parking elsewhere and introduce restrictions to allow enforcement where appropriate.
- 91 We should also support changes to national legislation to decriminalise the offence of footway obstruction so that it can be enforced by Civil Enforcement Officers without a TRO.

On Street Parking Charges

- 92 There are currently on street parking charges in limited waiting bays in Guildford, Woking, Farnham and West Byfleet town centres. There are also some longer term paid for bays around Walton on Thames Station used primarily by rail commuters.
- 93 On street charges are beneficial in terms of creating turnover or churn and help improve enforcement efficiency. Surplus income can also be used to improve the local highways and public realm infrastructure.
- 94 Most limited waiting bays in Surrey are free and have time limits ranging from 30 minutes to 3 hours. Conversely most District and Borough Councils charge for parking in their car parks, so parking in premium locations (e.g. right outside shops) is free, whereas there is a fee for parking further away in a car park. Not only is this counter-intuitive but it can also lead to people driving around trying to find a free on street space. Some D&B's in the county still operate parking enforcement at a loss so additional income from parking charges would improve the financial situation. The enforcement of limited waiting bays can be time consuming and there are often complaints that visitors and local workers overstay the time limits when there is not an enforcement officer in the area, to the frustration of some businesses.
- 95 The decisions as to whether charges should be introduced lie with local committees.

Parking charges – Proposal

- 96 The council should support the introduction of on street parking charges (including the provision of free periods where it is financially viable and the best solution) to increase enforcement efficiency, churn and access to facilities.
- 97 The parking team should work with Local and Joint Committees to select trial locations where 'pay and display' would be beneficial, as part of the parking review process.

Red Routes

- 98 Where urban roads are heavily trafficked and there is a need to control parking to maintain the free flow of vehicles, it is normally sufficient to prohibit waiting and loading at specific times of day. However, this does not prevent vehicles stopping for the purpose of picking up and setting down passengers, which in itself can contribute to traffic congestion on very busy roads.
- 99 An alternative type of control to “no waiting” and “no loading” is the red route, which prohibits stopping. First introduced in London, red routes are now prescribed by the Department for Transport (DfT). Unlike a red route clearway, a red route has road markings and is more flexible as it does not need to operate for the whole day. Also, provision can be made for parking and loading at certain times.
- 100 DfT advice is that red routes are intended to be used strategically to deal with traffic problems assessed on a whole-route basis, not to deal with issues on relatively short lengths of road. As with a red route clearway, the prohibition of stopping extends to the verge and footway. A red route order should permit a licensed taxi to stop to pick up or set down passengers and the driver of a vehicle displaying a blue badge to stop to pick up or set down a disabled person. Drivers of other vehicles should not be permitted to stop for any purpose other than in an emergency.
- 101 As the name “red route” implies, the road markings are red, which means that a red route has to be introduced in isolation and cannot be combined with the more conventional yellow line restriction. It is not possible to introduce a peak-hour prohibition of stopping with waiting restrictions at other times; red and yellow lines cannot both be laid along the same length of road. Therefore red route controls either operate for 24 hours or, if overnight parking can be permitted, throughout the day, typically 7 am to 7 pm.
- 102 Provision will need to be made for loading where this is essential for businesses along the route and cannot be accommodated either off-highway or on adjacent roads. A red route can therefore include loading bays which operate either for the full duration of red route control or for some shorter period. Loading bays might not be required where the red route operates during daytime hours only and loading can take place overnight. Provision may be made for on-street parking, particularly for disabled badge holders, where there is no alternative (i.e. off-highway or on adjacent roads). Time-limited waiting by any vehicle might be required where small retail businesses, for example, could be adversely affected by red route controls. Parking and loading bays should normally be the exception rather than the rule and should be provided only over short lengths of road. To do otherwise could undermine the concept of the red route, which is intended to provide a road free of stationary vehicles. However, where controls that operate throughout the day (e.g. 7 am to 7 pm) are primarily intended to prevent stopping during peak hours, it will not be necessary to restrict the provision of loading and parking bays if these are

required only during off-peak periods. A bay may have dual use, e.g. used both by disabled badge holders and for loading.

Red Routes – Proposal

- 103 Red routes can be considered by Local/Joint Committees as part of the parking review process but their use should be limited to the primary route network (A Road or SPN 1) and used consistently along a clearly defined route where they would help maintain traffic flow.
- 104 The cost of implementing a red route could be high over a continuous length of road and camera enforcement is likely to be necessary. Implementation and enforcement costs should be identified in advance.

Camera Enforcement of Parking Restrictions

- 105 The enforcement of parking restrictions solely by camera is now only allowed for contraventions on School Keep Clears (SKC's), bus stop clearways/bus lanes and red routes. In this context this is where a parking contravention is identified by a camera operator (who would be a trained CEO) who then issues a PCN to the vehicle keeper through the post based on video evidence.
- 106 Vehicles equipped with Automatic Number Plate Recognition (ANPR) can also be used to gather information about parking contraventions but a CEO must place a PCN on the vehicle at the time of the offence in the conventional manner rather than the owner receiving it through the post.
- 107 As discussed above, if red routes were implemented in Surrey they could (and would need to) be enforced by camera to improve compliance.
- 108 Another application for camera enforcement is outside schools. In most districts and boroughs there are not enough CEOs to provide a presence outside most schools each day. Borough enforcement teams prioritise the neediest locations and rotate staff appropriately. Parking and driving behaviour usually improves when there is a CEO present but they cannot spread themselves thinly enough around all the schools each day. Cameras may help this situation.
- 109 Two main types of camera application are possible:
 - a) Static (fixed to lamp columns although they can be moved fairly easily). Advantages are that these are usually left in place for weeks or months and can have a longer term effect on behaviour. As camera hardware becomes

cheaper, more can be purchased and rotated around schools as needed.

- b) Mobile (usually on a CCTV camera car). The vehicle can be purchased outright (higher upfront costs) or leased for periods of time as needed.

110 Both methods would require publicity and awareness campaigns with school users and parents to increase effectiveness. Our Road Safety and Active Travel Team would be involved with this work as well as selecting potential sites.

111 There are around 10 schools in each borough that might need regular camera enforcement, so that would equate to at least 110 around the whole county. Managing this operation could become quite onerous and expensive. The income from PCN's issued on SKC's would offset the cost however the operation might not be self-financing as compliance levels would be likely to increase significantly.

Camera Enforcement - Proposal

112 The council should approve the use of enforcement cameras where they are permitted to be used on the highway and set up trials with enforcement partners to determine the most effective means of enforcement (both in terms of compliance and cost) to help shape a longer term camera enforcement policy for SKC's.

Financial Implications

113 Two key principals of the new Fees and Charges Policy adopted by Cabinet on the 18 December 2018 are:

- Users of discretionary services are expected to pay for the full cost of the service being received rather than the general tax payer
- Approval for services to be provided at subsidy or the provision of concessions must follow the governance set out in the policy and align with corporate priorities

114 Fees and charges must be set to recover our costs and not to make a 'profit' but they can include our 'total' cost including overheads etc.

115 However, authorities are under a duty (Local Government Act 2003) to ensure that, taking one year with another, the income from charges do not exceed the costs of provision.

116 The direct cost of changing resident and visitor permits is approximately £40,000 plus officer time. This is due to the

requirement to place a statutory advert in local papers covering the whole county. District and Borough Councils will also need to change documents and web pages in line with the changes.

117 The majority of the fees and charges (resident and visitor permits etc.) are collected by our enforcement agents, the district and borough councils. The income would go into the on street parking account to offset the costs of operating Civil Parking Enforcement for a given area. If there is a surplus from operating CPE it is split:

- 60% to the Local or Joint Committee
- 20% to the District or Borough Council (Enforcement Agent)
- 20% to SCC for maintenance of parking infrastructure

118 By law any parking surplus generated must be used in accordance with S55 of the Road Traffic Regulation Act 1984 (as amended) which generally includes parking, highway improvement/maintenance or environmental improvements in the public realm.

119 The table below shows the estimated changes in income due to the policy changes highlighted in this report.

	Existing Income (Countywide)	Possible change in income (countywide)	Notes
Resident Permits	£500,000	+£250,000	First permit to change from £50 to £80 to reflect full maintenance/enforcement costs for schemes since 2011. Second permit charges increased from £75 to £100/£130 to deter multiple applications.
Visitor permits	£250,000	+£35,000	2 hour permits introduced for £1 and all day 'town centre' permits for £3.
Carer and medical permits	£10,000	-£10,000	No change
Business permits	£80,000	£0	These can be introduced into permit schemes when they are implemented but there is no change to the proposed charge of between £150 and £500 for permits
Suspensions and waivers	£200,000	+£40,000	Revised fees updated since 2011
Immobilisation	0	0	Likely to break even if implemented. Trials to take place to evaluate.
Disabled bays	0	0	No change

APM's	0	+£15,000	Difficult to estimate, however each application will be self-financing.
Footway Parking	0	0	Does not create income
Parking Charges	£1,200,000	0	There is no target for additional income from parking charges
Red Routes	0	0	None proposed at present.
Camera enforcement of SKC's	0	0	Trials will be needed to evaluate costs etc however target would be to break even.
Total		+£330,000	

Legal Implications

120 In order to change the charge for a parking permit and/or create new, or amend existing, parking restrictions, it is necessary to amend Traffic Regulation Orders. That involves a statutory consultation/advertising in accordance with the provisions of the Road Traffic Regulation Act 1984 and associated regulations. This legislation requires that Surrey County Council places a notice in newspapers circulating where the changes are proposed, and in the case of changing permit charges across the whole of the county, describing the proposals. There are associated advertising and display provisions and also a requirement to allow for objections to be made in response to the consultation/advertisement. A public inquiry is possible in relation to unresolved objections, and this is a compulsory requirement where loading/unloading is affected by the proposals or there is an objection from a bus operator, and the relevant objections have not been withdrawn. Otherwise the need to hold an inquiry is discretionary.

121 The Council has power in section 75 of the Highways Act 1980, in relation to highways maintainable at public expense comprising both a footway or footways and a carriageway, to vary the relative widths of the carriageway and any footway.

122 Red routes are now permitted as a result of changes to the Traffic Signs Regulations and General Directions 2016.

123 Fees and charges should be set to recover the cost of providing the service or to achieve other transportation objectives. It is not permissible to set charges that are solely intended to meet expenditure plans or fund transport strategies.

Equality and Diversity Implications

- 124 There are no negative equality or diversity implications associated with this report. The provision of parking controls and the enforcement of them can help improve access to services and facilities for all road users. Specific implications associated with camera enforcement, red routes and persistent offender policies will be considered as these are developed during trials.

Conclusions

- 125 Our relevant 2030 vision objectives for parking related services are:
- 126 **Residents live in clean, safe and green communities where people and organisations embrace their environmental responsibilities.** The proposals in this report include changes to resident permits that will encourage off street parking. Other proposals include ways of improving safety outside schools and reducing antisocial pavement parking.
- 127 **Businesses in Surrey thrive.** Regular parking reviews and the introduction of improved limited waiting facilities near shops and businesses will improve access to them for customers and deliveries.
- 128 **Journeys across the county are easier, more predictable and safer.** Regular parking reviews can keep on top of obstructive parking issues and new powers to introduce red routes and camera enforcement can help improve traffic flow and safety.
- 129 **By 2030 we want Surrey to be a uniquely special place where everyone has a great start to life, people live healthy and fulfilling lives, are able to achieve their full potential and contribute to their community and no one is left behind.** The provision of disabled parking bays, medical permits, carers permits at no (or very low) cost to the applicant will help improve the mobility of disabled residents as well as access to more vulnerable residents who are in need of care by medical staff or relatives.
- 130 **Summary of key points**
- Local and Joint Committees to look to introduce on-street parking charging to help improve access to retail areas.
 - Make the following changes to permit charges:
 - Increase the charge for the first resident permit issued to a household from £50 to £80
 - Increase the charge for additional resident permits issued to a household from £75 to:
 - 2nd permit £100
 - 3rd and subsequent £130

- Increase the maximum allocation for all day visitor permits from 120 to 150
- Increase the charge for visitor permits in larger town centres from £2 to £3
- Introduce a 3 hour visitor permit in all schemes, costing £1, with a maximum allocation per household of 300
- Introduce greater discretion to for district and borough enforcement teams to issue more/fewer visitor permits as particular circumstances allow
- Introduce a child care permit at the same rates as a resident permit, dependent on how many had been issued to the property
- Make the following changes to charges for suspensions and waivers:
 - Increase the initial charge for a suspension (valid for up to 3 days) from £65 to £75
 - Increase the charge for additional days that the suspension is in force from £10 to £12
 - Increase the initial charge for a waiver (valid for up to 3 days) from £15 to £25
 - Increase the charge for additional days that the suspension is in force from £5 to £6
 - Develop and trial a persistent evader policy that will enable immobilisation or removal of persistent evader vehicles (those whose owners evade payment of parking fines)
 - Improve on line application process for disabled bays
 - Introduce a charge of £50 to assess an application for a new access protection marking (H bar) or the extension of an existing one and a charge of £120 to provide a new one (if application is successful), or to refresh or extend an existing one
 - Consider use of red routes in appropriate locations to improve flow of traffic
 - Trial the use of CCTV cameras where they are permitted to be used on the highway (i.e. outside schools and on bus stop clearways/bus lanes) to improve enforcement

Recommendations:

- 131 The Select Committee is asked to review and endorse the proposals in this report for the reasons described.

Next steps:

- 132 The Select Committee's recommendations will be considered by the Cabinet before new policies are agreed. Residents and visitor permits changes will be subject to a statutory consultation before implementation.

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Sources/background papers:
Surrey County Council Parking Strategy 2011

Annex 1

Resident Permits - What do other councils do?

Kingston upon Thames make a standard charge of £90 for residents permits regardless of how many are issued.

Horsham District charge £43 for the first and £75 for subsequent permits.

Sutton Borough charge between £40 and £200 depending on vehicle emissions and the number of permits required.

East Hants District (Petersfield) charge £30 for the first and £50 for the second.

Sevenoaks charge between £35 and £250 for permits depending on off street parking availability and the number issued.

Breakdown of proposed first permit charge

Based on a scheme with 50 properties with 1 permit per property.

Permit application checks – 0.5h @ £50 p/h. The first application could take 45 minute to process. Renewals take less time.

Enforcement – CEO visits will vary from daily to perhaps once per week for small schemes. A CEO could typically spend 1.5 hour per week enforcing an area with about 50 properties including travelling time. One and a half hours per week is approx. 75 hours per year @£30p/h = £2,250. Divided by 50 properties is approximately £45 each per year.

Repayment of the capital set up costs could be made over 10 years. Signing, lining and TRO costs for a scheme covering 50 properties could be £5000. The approx. cost per property over 10 years would be £10 per year.

Visitor Permits, What do other councils do?

- Kingston upon Thames charge, 1 hour - 50p, 6 hours - £1.50, 24 hours - £3
- Horsham District charge 40p for 2 hours.(Business permits £150 to £260)
- Sutton give 50 free hours of parking to residents each year then sell 100 hours for £61. Vouchers (permits) can be obtained with various time limits.
- Sevenoaks charge £6 for 5 daily permits

Carer permits - What happens elsewhere? (Not all authorities provide details)

- Horsham District charge £21 for healthcare permits (valid for 2 hours)

- Hounslow charge £67.50 for a carers permit
- East Sussex charge 50p per permit in books of 10
- Sutton charge £35 for carer permits and £50 for medical permits

Disabled bays - What do other authorities do?

East Hampshire District Council

- Online application form which allows you to upload blue badge copy.
- No V5 form asked for, but states that the driver must live at the applicant's address permanently.
- Do not charge for this service

Rushmoor Borough Council

- Online form results in a visit to property to check documents in person.
- Do not charge for this service

West Sussex

- Online application form where you can upload a copy of the blue badge.
- Do not charge for this service
- Need to be in receipt of certain disability benefits.

Reading Borough Council

- On line applications
- To apply for a new disabled parking box or to have one repainted, you will need to pay a non-refundable application fee of £54.

Sevenoaks District Council

- Downloadable application form only.
- Do not charge for this service
- You must be in receipt of one of the following benefits:
 - Higher rate of Disability Living Allowance; or
 - Higher rate of Attendance Allowance

Kingston Borough Council

- On line applications
- Do you receive the higher rate mobility component of the Disability Living Allowance or the enhanced rate of the mobility component of Personal Independence Payment?
- Do not charge for this service

Sutton Borough Council

- On line application
- Do not charge for this service

APM's, what do other authorities do?

East Hants

- There is a non-returnable fee of £60 for processing an application. If approved, the road marking itself is painted free of charge.
- Criteria is just that the dropped kerb is properly constructed.

Rushmoor Borough Council

- Charges. Single access drive: £105 (including VAT) / Double access drive: £125 (including VAT)
- Eligible to anyone who has a proper dropped kerb.
- As of 1 April 2015, if you still need the line after this time and it needs refreshing, you will have to submit a new application and fee.

West Sussex

- Online form for new or refresh, photos can be attached.
- Installation and refurbishment both cost £146.88.
- Proper dropped kerb is criteria.

Reading BC

- The charge for this is dependent on size (which does not include re-painting when necessary).

Kent CC

- There must be a proven persistent obstructive parking problem at the address of application. This issue cannot be a transient issue such as road works or building development in the local area. Evidence of this can be demonstrated on the traffic monitoring form attached. Police incident numbers MUST be supplied in order that the Traffic Police can verify a persistent obstruction problem.
- A cheque made payable to Kent County Council for a sum of £121 must be included with your application
- Each individual application must be approved by the relevant traffic management division of the traffic police, which we will gain on your behalf.
- If your application is successful, the cost of introducing and maintaining a white 'Access Highlight Marking' line on the highway is currently £158. This amount will include for the maintenance of the highway marking over a maintenance period

of at least ten years. You will be invoiced for the full amount prior to any work being carried out.

- Markings are only done from one end of dropped kerb to the other (no extensions).

Proposed conditions associated with new SCC APM policy.

- If your dropped kerb is shared with a neighbouring property, the marking will extend across the total length of the dropped kerb and not just your part of it. It will be up to you if you wish to share the cost of the marking with your neighbour. We may only consider marking part of a dropped kerb if it is shared by four or more neighbouring properties in a row. You should obtain agreement from your neighbours who share any dropped kerb with you.
- The marking will extend across the width of the dropped from the top of the angled kerbs, unless you have requested for a marking to be provided with an extension.
- Extensions of markings will only be agreed if it is possible to do so. When markings extend longer than the extent of the dropped kerb, we will need to take into account the distance between other dropped kerbs in relation to the road space being left on each side.
- If an extension is possible, the length will be at the discretion of the engineer carrying out the site assessment.
- If there is an existing access protection marking for a neighbouring property that is close to your driveway, the markings may be joined up if the gap between them is considered to be too small for an average size vehicle.
- If your road happens to be resurfaced or surface dressed, the access protection will be put back without charge.

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Communities, Environment and Highways Select Committee



19 September 2019

Surrey County Council's response to statutory consultation on Heathrow Airport expansion

Purpose of the report:

The Select Committee is asked to consider the County Council's draft response to the statutory consultation on Heathrow Airport Limited's plans for airport expansion.

Introduction:

1. The statutory consultation on Heathrow Airport's Preferred Masterplan for the future expansion of the airport ran between 18 June 2019 and 13 September 2019. This was scheduled to be the last public consultation in advance of Heathrow Airport Limited (HAL) submitting an application for a Development Consent Order (DCO) to the Planning Inspectorate (PINS) for examination under the provisions of the Planning Act 2008 for determining Nationally Significant Infrastructure Projects (NSIPs). The scale and complexity of the expansion plans is considerable and the consultation material substantial; as well as a third runway and new terminal facilities, Heathrow's expansion will include modification of the M25 between junctions 14-15, replacement and re-routing of local roads, river diversions and flood storage, parking, environmental mitigation and a range of airport supporting facilities.
2. The draft consultation response attached at Annex 1 has been produced in consultation with Surrey County Council services impacted by the scheme and provides commentary on the specific issues that are likely to significantly affect Surrey residents, businesses and county council service interests.
3. As agreed with the Leader and relevant Cabinet portfolio holders, the draft response was submitted in time to meet the consultation deadline, but HAL is aware that this response is subject to political sign off following the end of the consultation period and have accepted that further comments may be provided before the end of September.

Airport expansion and the DCO process

4. As Heathrow's expansion proposals are classified as an NSIP, permission requires the grant of a DCO under the Planning Act 2008. PINS will examine the DCO application and make a recommendation to the Secretary of State for Transport, who will make the decision on whether to grant or refuse permission. The

DCO will be assessed against the Airports National Policy Statement (ANPS), which provides the policy framework for a Northwest Runway at Heathrow airport and associated new and reconfigured terminal facilities.

5. The June – September Airport Expansion Consultation is programmed to be the last public consultation prior to HAL’s DCO application, which is expected to be submitted to PINS in 2020. It is the only statutory consultation on the new runway and physical infrastructure and operational changes needed for expansion (although under the separate airspace change process a consultation on flight path options is anticipated in 2022). The consultation provides a vast amount of supporting technical information, much of which is effectively an early version of information and assessments that will be required for the DCO submission.
6. The DCO process front loads much of the engagement that scheme applicants are required to have with statutory consultees. As a ‘host authority’ for the scheme, which extends into the county, this Council’s engagement with HAL on the expansion proposals has been ongoing for a number of years and the consultation response covers many of the issues that have been raised during this ongoing engagement.
7. The majority of engagement with HAL takes place through HSPG, which comprises ten local authorities in ‘the area of influence’ of expansion at Heathrow as well as impacted Local Enterprise Partnerships and the Colne Valley Park Community Interest Company. The group was established in 2015 to lobby and be a collective voice on matters relating to expansion and to enable collaborative spatial planning aimed at reducing and mitigating impacts as well as looking to maximise the benefits of an expanded Heathrow. A Lead Members Board was established in July 2017 to enable political discussions with HAL and government. Through this board, Surrey County Council has also endorsed HSPG’s response to the consultation, which raises vital strategic issues as well as providing detailed comments on a number of the technical documents included as part of the supporting material.

Surrey County Council position

8. There have been a number of resolutions on airport expansion at Full Council since 2013, the most recent being the 9 October 2018 resolution setting out the Council’s position on Heathrow expansion:

This Council:

- *Recognises the crucial role of Heathrow in supporting employment for Surrey residents, generating investment for the Surrey economy and attracting major businesses.*
- *Urges that the environmental and infrastructure issues associated with expansion are satisfactorily addressed.*

- *Continues to engage with Heathrow management, alongside other local authorities, Local Enterprise Partnerships and other organisations as part of the Heathrow Strategic Planning Group, on its expansion plans in order to protect and promote the interests of Surrey, its residents and businesses.*
 - *Continues to press for proper compensation for residents who are affected by the expansion plans.*
 - *Emphasises that the necessary infrastructure should be in place before any new runway comes into operation together with appropriate mitigation measures and commitments to address environmental impacts.*
 - *Calls on the Government to prioritise a southern rail access scheme, which supports strategic transport and economic objectives and contributes to addressing environmental impacts, to be in operation before any new runway comes into service.*
9. The consultation response is in line with this resolution, in particular focussing on the surface access and environmental issues that need to be addressed. The response relates the comments to the relevant topics for the assessment of potential impacts and assessment principles identified in the ANPS. Considerable cross service engagement and coordination has been undertaken to enable the potential impacts to be identified and considered as fully as possible.
10. There are a number of areas where the Council has grave concerns. On surface access provision, we continue to stress that delivery of a Southern Rail scheme needs to be expedited and preferably be in place for when the new runway comes into operation. Officers have met with Department for Transport (DfT) officials and there has also been ongoing engagement with the Department through HSPG to press for the project to be developed to support Heathrow expansion as early as possible. The Leader has recently written to the Secretary of State for clarity on next steps and funding and it is clear that this Council and HSPG need to continue to lobby DfT and HAL to push forward work to develop the project and ensure it benefits Surrey and the wider South East and not just south west London.
11. We highlight the inadequacies in transport modelling data and lack of detail on impacts on local roads and specific public transport and active travel measures within the county. The proposed Surface Access Strategy is critical, not least because increased traffic around the airport, especially heavier freight vehicles, could affect road condition and have maintenance implications for the council.
12. Air quality is an area of concern for the Council because of its impact on public health. The DCO boundary is surrounded by Air Quality Management Areas (AQMAs) and the whole of Spelthorne is an AQMA. The Stanwell area could be significantly impacted because of the increase in airport related road traffic to the south and west of the airport and construction activities but more information on transport modelling is needed to fully assess the

impact on air quality. We would like to see HAL commit to supporting progressive reductions in air pollutants in areas currently below legal thresholds, not just avoid contributing to exceedances of maximum legal limits.

13. A lack of detail is a common issue particularly on mitigation measures, to enable us to understand and develop an informed view of the likely environmental effects and health impacts on communities. This causes specific concern for the Council in areas such as environmental mitigation and compensation and work to manage flood risk. The concern of Surrey residents on the as yet unknown nature of noise impacts associated with expansion is also recognised.
14. All issues raised within the consultation response are captured within a Heathrow Issues Log and HAL's progress in addressing each issue will be tracked throughout the DCO process. Issues that remain unresolved at the point of examination will form the basis of our submissions to the examination.

Conclusions:

15. The consultation response considers the potential impact of HAL's proposed scheme on the council's services, residents and businesses and sets out where issues need to be addressed and more information provided to enable the likely effects to be fully understood. The response is in line with the 9 October 2018 Full Council Resolution, which sets out the Council's position that the environmental and infrastructure issues associated with expansion should be satisfactorily addressed. Some of the comments in the response repeat points made at both a political and officer level during ongoing engagement with HAL on scheme development in bilateral meetings and through the Council's membership of the Heathrow Strategic Planning Group (HSPG).

Recommendations:

16. The Communities, Environment and Highways Select Committee is asked to consider the draft consultation response attached at Annex 1.

Next steps:

- Cabinet to consider draft response and Select Committee's comments at its meeting on 24 September 2019.
- Submission of any additional comments on the consultation to HAL by 30 September 2019.
- Ongoing work through the Heathrow Strategic Planning Group to influence the design of the scheme, including mitigation measures, before DCO submission for examination (programmed for summer 2020).
- Ongoing engagement with HAL at a political and officer level to follow up on concerns and key issues set in advance of DCO submission.

- Future member briefing sessions to update on Heathrow expansion proposals (including airspace change) if appropriate.
-

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Annexes:

Annex 1: Surrey County Council response to Heathrow's Airport Expansion Consultation

Sources/background papers:

- Heathrow Airport Expansion Consultation material
<https://aec.heathrowconsultation.com/collections/all-aec-documents/>
- Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England June 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/714106/airports-nps-new-runway-capacity-and-infrastructure-at-airports-in-the-south-east-of-england-web-version.pdf

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Mr John Holland-Kaye
Chief Executive
Heathrow Airport Limited
[by email: feedback@heathrowconsultation.com]

Monday 9 September 2019

Dear John,

Airport Expansion Consultation June 2019 - Comments from Surrey County Council

Thank you for the opportunity to comment on your preferred proposals for the expansion of Heathrow Airport. As indicated at our recent meeting, Surrey County Council's Communities, Environment and Highways Select Committee and Cabinet will not have had the opportunity to consider and agree this response before the consultation deadline of 13 September. However, as agreed, we are submitting this draft response to meet the deadline and if there are any subsequent comments to be made we will provide these to you by the end of September.

We recognise the importance of Heathrow's role in supporting employment for Surrey residents, generating investment in Surrey's economy and attracting business to locate in the county, but the environmental, surface access and other infrastructure issues associated with the expansion must be satisfactorily addressed. The anticipated impacts during both construction and operation of an expanded Heathrow will have significant impacts on communities, businesses and the environment in the county especially in relation to noise, congestion on the road network, air pollution, flood risk, the water environment and green and community infrastructure.

A particular concern is the potential cumulative impact on those Surrey communities of Stanwell and Stanwell Moor closest to the airport. The proposed Surface Access Strategy is critical, not least because increased traffic around the airport, especially heavier freight vehicles, could affect road condition and have maintenance implications for the council. We have considered the consultation documents in this context and in the county council's roles as the local highway authority and minerals and waste planning authority for Surrey, as a key infrastructure provider and with passenger transport and public health responsibilities.

Whilst we appreciate the substantial amount of work that has already gone into developing the preferred Masterplan and the engagement we have had with Heathrow Airport Limited (HAL) to date, we need to see more information, particularly on mitigation measures, to enable us to understand and develop an informed view of the likely environmental effects, especially in those areas listed above, construction, delivery and implementation and the health impacts on communities. Our response reflects this and our comments are less detailed than they might have been had the consultation been carried out when the proposals were more developed and more detail available.

It is a pity that even though the Heathrow Strategic Planning Group (HSPG) of which we are a member has been working with HAL for a number of years, a key premise of ensuring that a common

base position supported by appropriate detail could be agreed early on with HAL has not materialised as we are still awaiting much of the necessary detail.

We are also disappointed that the emerging preferred Masterplan, which will have very significant impacts on communities in Surrey, appears to lack ambition as regards legacy and benefits such as improved and subsidised public transport, active travel infrastructure, community and recreation facilities, skills training and enhanced or new green infrastructure. We are concerned that even some of the proposed benefits for communities and local businesses will not materialise given the recent CAA CAP1819 consultation. There is a need for further consultation with this council, HSPG, local communities and other stakeholders on surface access and mitigating the environmental effects as the scheme design progresses and we will continue to engage positively with HAL in this process.

Our considerable concerns over the preferred Masterplan and plans to operate and manage the impacts of the airport as it grows are set out in the annex to this letter. In particular, we wish to emphasise the following points:

1. Southern Rail Access is a priority infrastructure project for this council and will support economic and sustainable growth. A rail link is essential to achieve greater modal shift from the south and, in our view, if there is no fast and reliable public transport provision to Heathrow serving Woking, Guildford and other parts of Surrey plus the wider south east, HAL may not be able to meet their public transport targets. Furthermore, if HAL does introduce the proposed vehicle access charge without meaningful and attractive additional public transport provision from Surrey this impacts disproportionately on Surrey residents (apart from those very close to the airport) who have little other option but to drive/take a taxi to Heathrow unlike London residents who do have fast and reliable public transport alternatives.
2. As the local highway authority for Surrey, we continue to stress that we are not being adequately consulted on transport assessments or mitigation proposals. The scale of parking proposed in the Stanwell area and the creation of a main vehicular point of access to the airport in the south west have a number of critical implications for Surrey. Sharing of transparent, robust transport modelling as soon as possible is essential for us to enter into discussions with HAL around impact and mitigation. This has been raised consistently through our responses to previous formal and informal consultations and engagement with HAL at all stages of scheme development. In our view, given HAL's timetable, detailed discussion that remains to be held should be happening now.
3. Expansion provides the opportunity for proactive bus improvements which can be future proofed to ensure viable services if frequency, route and journey time can be relied on. The commitment to public transport improvements to the south and west of the airport needs to be stronger. We would like to see greater detail on what specific improvements are being committed to including on the level of financial support that will be available to ensure sustainability of services in the long term and how this will be governed. This funding and the means by which it is permanently provided needs to form part of the Development Consent Order (DCO). Surrey County Council should be included in discussions regarding future bus routes within the county.
4. The Committee on Climate Change (CCC) is expected to report in the autumn setting out its recommendations for the aviation sector consistent with delivering the Government's recently legislated target for net zero carbon by 2050. We expect these recommendations to be taken into account in the Government's final Aviation Strategy for 2050 and there may be a requirement for the ANPS to be reviewed. This is a key issue that HAL will need to address.
5. Air quality is an area of concern for the Council because of its impact on public health. The DCO boundary is surrounded by Air Quality Management Areas (AQMAs) and the whole of Spelthorne is an AQMA. The Stanwell area could be significantly impacted because of the increase in airport related road traffic to the south and west of the airport and construction activities but more information on transport modelling is needed to fully assess the impact on air quality. We would like to see HAL commit to supporting progressive reductions in air pollutants in areas currently below legal thresholds, not just avoid contributing to exceedances of maximum legal limits.
6. We would question whether the one hour recovery period for delays that HAL appears to be assuming as part of normal operations should count towards the six and a half hour scheduled

night flight ban period required by the Airports National Policy Statement (ANPS). We consider there should be a full six and a half hours when only dispensed flights would be acceptable rather than the currently proposed five hours and fifteen minute no operation period. The design of any noise envelope must go beyond maintaining the 2013 baseline and should be subject to regular review at least every 5 years given that noise metrics, understanding the physical and mental health impacts of noise and aircraft technology are continually evolving. The noise insulation policy should also be subject to regular review.

7. Early growth is dependent on the use of Independent Parallel Approaches (IPA) to allow more arrivals through the use of new arrival routes into Heathrow from the holding stacks. IPA is a serious concern for many residents of Surrey as it could potentially impact on areas of Surrey Heath, Woking, Spelthorne, Runnymede, Elmbridge, Epsom & Ewell, Mole Valley and Reigate & Banstead. This council does not support IPA as it would represent a worsening of the current situation for many local communities and could have health impacts. We do not consider there to be any national policy basis in either the ANPS or Government aviation policy for the more intensive use of the existing two runways to support early growth at Heathrow, but if early growth is to be allowed as part of the Development Consent Order (DCO), then it must be subject to noise management controls including no additional runway landings or take offs before 06:00.
8. We strongly disagree with proposals set out within the Preliminary Environmental Information Report (PEIR) to disregard aggregate recycling capacity at Hithermoor Quarry. Development in the vicinity of Hithermoor Quarry must allow for transport and processing of any future mineral extraction from King George VI Reservoir in accordance with the adopted Surrey Minerals Plan and we consider that any implications for the ability of Hithermoor to be used for the processing of material from King George VI Reservoir must be appropriately assessed.
9. We are very concerned that not all land to be assembled for necessary mitigation measures is included within the DCO boundary. The Masterplan includes various measures, particularly in relation to the provision of high quality, connected green and blue infrastructure and open space, which could provide quality of life and health benefits for residents in terms of leisure and active travel, however, the land identified for these purposes is outside the application boundary. There is no guarantee that this land can be secured through third party agreements and so there is a risk that not all of the Masterplan, especially some of the proposed mitigation, will be delivered which would be to the detriment of local communities.
10. The Wider Property Offer Zone (WPOZ) should be extended to incorporate the entire village of Stanwell Moor and large parts of Stanwell. There will be residents in these communities who will experience prolonged quality of life and potential health impacts given the long construction period by being exposed to temporary unacceptable levels of noise during construction. They will also be newly exposed to more aircraft noise from the expanded airport once it is operational, including from aircraft on the runways and taxiways as well as overhead and likely poorer air quality. We consider that there needs to be a local health impact assessment for each of these communities so that the combined and cumulative effects of HAL's proposals on residents can be understood.

Given the extent of our comments, rather than addressing the specific questions in the feedback questionnaire, we have presented them in the annex in terms of the relevant topics for the assessment of potential impacts and assessment principles identified in the ANPS. However, where possible we have indicated where they relate to particular feedback questions. We would also refer you to HSPG's response. We welcome ongoing dialogue with HAL (and through our involvement with HSPG) as HAL sets about finalising the Masterplan and DCO application.

Yours sincerely,



Colin Kemp
Deputy Leader

ANNEX

Surrey County Council's response to the Airport Expansion Consultation – September 2019

Surface Access (Feedback questions 9-11)

The following comments on this topic can be summarised in five key points:

1. A firm commitment that HAL agrees the need for Southern Rail Access and will stand together with local authorities on the outcomes that we collectively wish to see delivered and pro-actively work with Government to deliver it. If a Southern Rail scheme cannot be delivered before the new runway is operational, we suggest a condition on the DCO that no more than 600,000 ATMs per annum should be allowed until both the Western and Southern Rail schemes are in place.
2. The need for more information and sensitivity testing of different interventions and assumptions that are being modelled to inform the iterative process of mitigation identification and to enable us to understand the likely impacts.
3. A stronger commitment to and more detail on specific public transport and active travel measures to the south west of the airport.
4. An urgent request to see the impact modelled of 'hard wiring' the Southern Parkway into the SRN.
5. A request to commence discussions on Controlled Parking Zones and how these will be implemented.

General comments

Surrey County Council wishes to raise a number of fundamental issues on HAL's work to date in relation to ANPS requirements. As the local highway authority for Surrey, we continue to stress that we are not being adequately consulted on transport assessments or mitigation proposals. The scale of parking proposed in the Stanwell area and the creation of a main vehicular point of access to the airport in the south west have a number of critical implications for Surrey. Sharing of transparent, robust modelling as soon as possible is essential for us to enter into discussions with HAL around impact and mitigation. This has been raised consistently through our responses to previous formal and informal consultations and engagement with HAL at all stages of scheme development. In our view, given HAL's timetable, much of the detailed discussion that remains to be held should be happening now.

The surface access proposals are highly focussed on meeting the mode share and colleague car trip targets of the ANPS, principally through limiting colleague car parking and introducing a vehicle access charge for passengers. As currently presented, they lack specific detail on how the airport's expansion will impact local transport networks and there is an absence of proposals for the provision of mitigation measures. It is stated that this information will be provided prior to the DCO in the Transport Assessment, but this document is not currently available and therefore not something that forms part of the consultation. Until we see the findings, including an assessment of committed mitigation measures, we are unable to give an informed view on the likely significant effects. In our view, the surface access strategy could do much more to facilitate sustainable travel within and across the Heathrow sub-region.

The public pledge on no more airport related traffic relates to an area that closely follows the boundary of the airfield. It excludes traffic generated by airport related development and supporting facilities located near the airport, but outside this boundary. This might include development displaced by the expansion itself. We consider that the no more traffic pledge should include traffic to and from any development displaced by the expansion and also construction traffic, particularly as construction traffic is included in the baseline and given the number of years over which construction will extend. The definition of through traffic is also a vital consideration and a clear definition needs to be established.

This same boundary applies to the definition of 'colleague' (airport worker). Such a narrow definition means that the forecast number of Heathrow colleagues that are subject to the ANPS travel requirements is lower. The definition of 'colleague' should be extended to include those working beyond the boundary of the airport in a role that is directly related to the airport, particularly if it is in a displaced activity. We support HSPG's request for a scenario to be tested within the surface access strategy that models the traffic impacts of the growth in employment outside the airport boundary that directly results from the airport's expansion.

Furthermore, we are concerned about the difficulty of clearly establishing the number of colleague trips in the base year, with the various surveys and MAID (access control system) data all measuring slightly different things. The lower the base means that the amount of colleague car trips that are needed to reduce to meet the ANPS targets is also reduced. Without clear evidence to the contrary, the base case number of colleague trips should be defined using assumptions that ensure the greatest absolute reduction in colleague car trips is tested.

Southern Rail Access

Southern Rail Access was originally identified as needed to support T5 and the Airports Commission envisaged Southern Rail Access as an integral part of the surface access strategy for an expanded Heathrow. Given that HAL sees the expansion of Heathrow as 'a unique opportunity to change the way that people and goods travel to, from and around the airport', wants it to be at the heart of the rail network and as helping to facilitate economic development, we are disappointed at HAL's seeming lack of recognition of the importance of a Southern Rail Access to achieving these aims.

A Southern Rail link is a priority infrastructure project for this council and HSPG. We believe it should be a pre-requisite for expansion and remain committed to being involved in helping to shape the best possible outcome. Such a link will support sustainable growth and will radically improve access to Heathrow Airport from many areas. By improving connectivity to economic hubs in the sub-region, it will help both distribute the economic benefits of the expanded airport as widely as possible as well as helping to ensure that the airport can meet its obligations on traffic and air quality.

A rail link is essential to achieve greater modal shift from the south and, in our view, if there is no fast and reliable public transport provision to Heathrow serving Woking, Guildford, other parts of Surrey and the wider south east, HAL may not be able to meet their public transport targets. If HAL does introduce the proposed vehicle access charge without meaningful and attractive additional public transport provision from Surrey this impacts disproportionately on Surrey residents (apart from those very close to the airport) who have little option but to drive/take a taxi to Heathrow unlike London residents who do have fast and reliable public transport alternatives.

We would like to see a firm commitment that HAL agrees the need for Southern Rail Access and will stand together with local authorities on the outcomes that we collectively wish to see delivered and pro-actively work with Government to deliver it. If a Southern Rail scheme cannot be delivered before the new runway is operational then in our view, and having considered HAL's own growth forecasts, there should be a condition on the DCO that no more than 600,000 ATMs per annum should be allowed until both the Western and Southern Rail schemes are in place.

Traffic impact, modelling and local roads

From the scheme development reports it is clear that transport modelling was not a key determinant of scheme design and only frequently referenced at a late stage in the process. As a local highway authority, we are very concerned by this approach and share the frustrations of HSPG's modelling sub-group around the lack of detail on what is being modelled and the lack of clarity around an agreed methodology. We remain concerned that there is insufficient information coming out of the modelling process to enable an audit of the assessment of the various scenarios and their impacts on Surrey's local road network.

Local authorities need proof of the robustness of the modelling, which includes greater clarity on the assumptions used. Without this there will remain disagreement over fundamental issues such as the proportion of traffic that is airport related and the extent of the impact on the local road network. Authorities are sceptical of the findings that just two network links will be operating in excess of capacity with seven forecast to be approaching capacity. We continue to seek clarity as to what sensitivity testing of different interventions and assumptions is being modelled. The HSPG transport sub-group has detailed specific assumptions that local authorities require sensitivity testing, which we fully support. These include the forecast proportion of transfer passengers, forecast number of airport workers, the impact of specific Surface Access Strategy (SAS) initiatives and growth in airport related traffic in the local area.

The Preliminary Transport Information Report (PTIR) contains no detailed junction modelling or microsimulation - just preliminary modelling of impacts on public transport and highway networks. Consequently, significant concerns exist as to how the iterative process of mitigation design will take place.

There remain fundamental queries around assumptions used within the modelling baseline, for example that less than 10% of total daily traffic on the majority of roads in the south west quadrant is estimated to be airport related traffic. Furthermore, preliminary modelling forecasts that there is to be little change on the highway network to the south west of the airport, with the majority of the difference occurring on the SRN, disregards growth in non-airport traffic in the local area, either due to induced or catalytic impacts of the expanded airport or for other reasons. Given the lack of capacity on the SRN for additional traffic, any increase in airport related traffic is likely to have significant local impacts. The consultation does not present any mitigation for these impacts stating that this will be part of the future transport assessment. We believe this is a serious omission from the current consultation, and that it is an important area of the scheme that is likely to require further consultation. As previously requested, we would like to see tested the scenario that the Southern Parkway be "hard wired" into the SRN, with no access to or from the local road network (other than for emergency access).

There remain significant concerns relating to the material reduction the proposed expansion will have on the capacity of the existing highways around the airport on the northern, western and southern sides. As they currently stand, the proposals result in the removal of much of the internal perimeter road network, and the replacement of a reduced capacity alignment of the A4. The A3044 replacement, whilst being of similar capacity (in terms of width), has a considerably greater design length, leading to longer journeys by all who use it. None of the new infrastructure provides discrete infrastructure for buses. By moving Airport Way and Southern Perimeter Road further south and increasing capacity to three lanes in each direction, there will be greater impact on the communities of Stanwell Moor and Stanwell due to increased noise and air pollution. Full consideration needs to be given to the location and access/egress for the relocated petrol filling station, which includes HGV facilities, to Stanwell Moor Road and any possible impacts on the Crooked Billet junction.

There are also elements of the scheme where we have queries around the 'buildability' of proposals, specifically at Junction 14. Space is limited for all the elements proposed here and we suspect that the Green Loop, an important green infrastructure element of the Masterplan and active travel corridor could end up being compromised. Greater assurances need to be provided that proposals are technically achievable.

There is a lack of detail on the quantum or impact of construction traffic, with no indication as to when this information will be presented. Insufficient justification has been given for the assumption that 60% of the construction workforce will travel by public transport.

Impacts on the local road network must be minimised and mitigated appropriately. Without sight of the full modelling data and assuming a worst case scenario of car access to and from the Southern Parkway via Surrey's network and to the Southern Road Tunnel and other hubs, we anticipate that mitigation may be required for a range of junctions and key links. Discussions around mitigation measures will only be possible once all modelling data is made available to assess performance issues associated with the expansion proposals. We have identified the following potential areas of significant highway impact:

- Junctions
- Horton Road with Junction 14 M25 roundabout.
- Spout Lane with A3113
- Spout Lane North with A3113
- Horton Road with A3044

- B378 with A3044
- Farnell Road with A3044
- A3044 with A30 (Crooked Billet)
- A308 London Road with Kingston Road, Staines
- A308 South Street with B376 Staines
- A308 Staines Bridge with B376
- A308 Staines Bridge with A320 Chertsey Lane (Egham Hythe)
- A308 with Fordbridge Road (roundabout)
- A308 with B378 School Road/Ashford Road signals
- A308 with Chertsey Road (Ashford Common)
- A308 with A244 Cadbury/Windmill Roads
- A308 with M3 with A316 with Vicarage Road with Station Road with Green Street (Sunbury Cross)
- B3003 with B378 with B377 (roundabout)
- A30 with B378 signals (Bulldog)
- B377 with B378 (roundabout)
- B377 with B378 (Signals)

- Links
- A3044 from county boundary in the north to Crooked Billet in the south

It should be noted that a number of the “committed and planned improvements” listed in the PTIR are either already completed or understood not to be committed:

- Runnymede Roundabout was substantially completed in July 2018
- Meadows Gyratory was completed in May 2019
- A30 Crooked Billet Roundabout - we not received confirmation that Highways England has committed funding to construct this scheme.

Bus and coach

We note that the SAS highlights that Surrey has the second highest share of passengers who would take public transport to Heathrow if access was improved. We would like to see explicit commitments from HAL that they recognise the value of investing in transportation assets and that much of this investment will need to be made beyond the airport boundary where journeys start and end. Where required, transport proposals should include detail on the level of financial support that will be available to ensure sustainability of services in the long term and how this will be governed. This increased level of funding and the means by which it is permanently provided needs to form part of the DCO.

Expansion provides the opportunity for proactive bus improvements which can be future proofed to ensure viable services if frequency, route and journey time can be relied on. The commitment to public transport improvements to the south and west of the airport needs to be stronger, with greater detail on what specific improvements are being committed to. Surrey County Council should be included in discussions regarding future bus routes within the county. These discussions need to take place now, well ahead of DCO submission.

We consider that dedicated bus lanes should be provided on all new highway infrastructure including Southern Perimeter Road and that more detail be set out on bus priority measures on the wider local networks. We support the recent route improvements that HAL have already put in place and the

proposals within the consultation. HAL must make the most of the opportunity to evaluate and report on the impact of any pilot schemes to demonstrate effectiveness to stakeholders.

We have specific comments on a number of route suggestions:

- Discussions are already underway around the funding of a more frequent service on the route 555 corridor. We believe that investment in bus priority measures, resolving on-route pinch points and making improvements to at-stop, on-bus and real-time information facilities on the 555 bus corridor would ensure this bus route is a reliable and attractive option for travel to and from the airport and would help to secure Heathrow's ambition for extending the frequency and operating hours for this route.
- We would support express bus routes towards Staines, Egham and Camberley and agree that these should take account of worker shift patterns. These routes should be open to the public too. There are currently no bus services between Egham/Staines and Heathrow between 00:30 and 04:00, which we would like to see addressed.
- We query whether new bus routes to Chertsey, Addlestone and West Byfleet have been explored? There is potential to consider the development at Longcross as a new public transport destination.

We would like to see a commitment that bus and coach operators will not be charged to use the new Southern Road Tunnel and that access will not be exclusively to specific operators.

To support the proposals for longer operating hours on bus routes we recommend investment in waiting facilities for services at these times including lighting, real-time passenger information and personal safety improvements to access routes to/from the bus stops to maximise patronage at locations away from the airport.

Serving a polycentric facility like Heathrow with direct bus services is challenging as a degree of interchange is inevitable. We recommend key interchange sites are identified, including along perimeter roads to avoid travelling into terminals to change, and that they are set up with stop facilities to support interchange and are advertised as such. Preferably these interchanges would avoid the need to cross busy roads to change buses. We agree with HSPG that the Southern Road Tunnel provides opportunities to develop a Bus Rapid Transit system from the Central Terminal Area to the A30, with extensions provided through partnership with operators.

The consultation sets out the intention for bus and coach routes to remain free-flowing on specified key roads around the airport. The council is keen to work with HAL to identify additional locations that require improvements on Surrey's network. It is our view that works will be needed on routes farther from the airport to ensure bus reliability. We would also want to see a commitment that monitoring continues on these routes and that improvements will be delivered even if problems arise once operational that weren't identified through modelling. We see variable messaging signs as having a role in the future to turn general traffic lanes into priority lanes for buses (and potentially other higher occupancy vehicles) at times when traffic is not free-flowing.

We support HSPG's view that there should be more emphasis within the SAS on measures to subsidise public transport to the airport as a way of encouraging modal shift. We support an extension of the free travel zone.

On accessibility and inclusivity of public transport, we would like HAL to consider making specific commitments to improve audio-visual announcements on buses and to work with their own staff as well as operators to ensure all staff have training in assisting travellers with non-visible disabilities.

Active travel

Surrey County Council is currently delivering £4.95m of sustainable transport infrastructure improvements through the Wider Staines Sustainable Transport Package (Staines STP) (delivery 2017-2020). The package includes improvements to passenger accessibility and waiting facilities at bus stops and the provision of off-road cycle infrastructure and controlled crossing facilities along a number of corridors within the Staines and Stanwell area.

Staines STP, which is majority grant-funded by the Enterprise M3 Local Enterprise Partnership (EM3 LEP), was also awarded £549,000 in funding from HAL through the Sustainable Transport Levy in 2016. The measures, of which a number have already been completed, improve southern access to Heathrow via sustainable modes along roads including A3044 Stanwell Moor Road, B378 Town Lane, B378 Park Road and A308 London Road. Elements of these improvements are expected to complement HAL's ambitions for the southern 'spoke' of an active travel corridor from Southern Perimeter Road into Spelthorne.

However, the Staines STP improvements will not deliver this in isolation and further spokes are needed to connect nearby areas of high Heathrow employee residency in Ashford, Sunbury and south Staines. The proposed infrastructure-related active travel initiatives within HAL's surface access proposals commit to nothing specific within this area, although there is recognition that existing infrastructure in Surrey must be improved to ensure end to end connectivity with the airport campus. As a general point, we therefore consider the proposals as being far too limited and lacking ambition and want to engage with HAL as to how the identified routes requiring enhancement can be defined and delivered as part of the surface access proposals.

We estimate some 4,000 colleagues live within cycling distance of the airport to the south. Key areas for improvements include:

- Extending the Stanwell Moor Road off-road facility north to connect with the perimeter facility orbiting the airport (this was previously not undertaken due to the anticipated changes to the road network around the airport)
- Extending routes south of the A30 to south Staines, Ashford and Sunbury
- Enhancing the Park Road facility
- The southernmost portion of the active travel route on Stanwell Moor Road is not complete. We would also like this route to be well connected to the Southern Parkway.

(Please note that within the PTIR, volume 4 p24, the footpath across the eastern edge of Hithermoor is incorrectly shown as an off road cycle route.)

Some of the surface access proposals appear to imply that the cycle routes through the Northern and Southern Road Tunnels to the Central Terminal Area may not be implemented. We strongly support the inclusion of these routes and ensuring the design of tunnel creates sufficient space for a segregated cycle track. These should be open and available for use at the first phase of expansion.

We would welcome further information on the effectiveness of the cycle hubs at the airport. We consider that there should be permeability for cyclists to access the airport boundary at several points to undertake that last mile of their journey. Clearly security will be a significant consideration, but without this permeability of access, cycling will not be maximised as a potentially major contributor to sustainable travel.

It would be good to see cycle hub access linked to any smart card or upgraded staff pass, rather than requiring separate application. We also support suggested cycle share and bike hire schemes, which would be desirable to extend the worker residential catchment along the identified corridors. No reference to Docking Cycle Stations is made and Heathrow could be a candidate for such a system that would provide local community benefit. TfL run docking cycle systems and Slough have a similar system. If HAL proposed cycle docking stations for a radius of the airport, it could be managed by them similar to the London model.

Walking should also be seen as an important enabler for public transport and demand management. We support core walking zone proposals, but the zones look small and disconnected and we would suggest that they should include connecting routes between them to link them together and to the wider community. Given the high levels of traffic, green screens that offer some barriers to noise and pollution would be desirable. There is a need for enhanced walking infrastructure around Stanwell, which has a high concentration of workers and is within walking distance of the airport and the Southern Parkway for onward shuttle.

Mobility information services

Surrey County Council supports the principles of improving knowledge of and confidence in sustainable journey options such as public transport, as a powerful means of encouraging modal shift. We note the low uptake of Heathrow's existing journey planner and suggest integration with third party apps and processes will be essential if the information is to reach the vast majority of prospective travellers. We suggest an open data approach will be important if data is to be incorporated into the widest possible array of third party travel tools, including technologies and services that don't yet exist.

We suggest that there is an opportunity to make use of existing smartcard technology which is familiar to members of the public and the technology is readily available to accelerate rollout and increase early user confidence in the product. It would be desirable to make enrolment for the Heathrow Travelcard automatic for new starters. Longer-term, the Heathrow Travel Wallet offers very similar functionality to emerging third party MaaS platforms, which may be better placed to reach a wider group of workers at Heathrow and be more appealing to those on short-term contracts who may use those other platforms across multiple job contracts. It would be positive to see a commitment from Heathrow to work with these products and integrate Travel Wallet incentives into them, where they can help Heathrow achieve its modal shift objectives

Car parking

The proposals for an overall increase in car parking appears to be at odds with HAL's modal shift ambitions and we continue to query the scale of parking proposed at the Southern Parkway. The Scheme Development Report suggests that there was little traffic modelling evaluation during optioneering for the parkways. Given the potential impact on the local road network in Surrey, we consider this to be unacceptable and urgently request to see the impact modelled of 'hard wiring' or isolating access to the Southern Parkway from the SRN. We consider it vital that the Southern Parkway has restricted access off the local road network to any private car (other than at times of incident on the SRN).

The phasing of the parkways is a cause for concern related to the quantum of parking proposed in the Stanwell area. The Northern Parkway is due to be completed later, not only concentrating vehicular access to the south west corner for a period, but also negating any potential for HAL to provide only the parking that is required, as has been previously suggested.

There is a commitment to work closely with local authorities to manage any potential impact from unintended off-site car parking resulting from the parking restraints to be applied. There has been no engagement with HAL on this specific issue to date and we seek confirmation that HAL will fund extensive fly parking management measures as required, including drawing up and consulting on proposals, implementation (following this council's approval) and funding of their management in perpetuity so that residents do not have to fund an annual permit fee. This will need to be operational at the construction stage. Areas to include are:

- Stanwell Moor and surrounding roads
- Stanwell and surrounding roads
- Ashford – where transport links generate a demand for potential airport parking (both employees and travellers)
- Staines - where transport links generate a demand for potential airport parking (both employees and travellers)
- Any other areas that may generate hub related fly parking, for example around a public transport.

We expect HAL to monitor role-based parking space allocations to understand where types of roles that require cars tend to exist, what the barriers are to getting rid of cars and then targeting actions to transform those roles in association with employers. We support HSPG's view that the number of colleague parking spaces could be reduced further.

Vehicle access charge

The council is supportive of the proposed vehicle access charge, but in common with HSPG, we would like to see it go further. HSPG believes the ULEZ and vehicle access charge should be payable by all vehicles accessing any part of the airport campus. Many local residents work at the airport and the Southern Road Tunnel could potentially turn into a local route if colleagues had permits or passes that allowed free access through Heathrow. There should be modelling of the ULEZ with and without colleague exemption. A robust plan needs to be put in place for preventing vehicle drop-offs and pick-ups to avoid the charge on roads close to the Parkways and thereby impacting on the local road network.

Surrey County Council support HSPG's position that the vehicle access charge should not be managed in a similar manner to the airport's existing revenue stream. Income from the vehicle access charge should be held in a hypothecated fund for supporting local transport infrastructure improvements and subsidising public transport fares. A democratic mechanism involving key local partners needs to be set up to help determine the spending priorities of this fund.

Freight

Freight trips are forecast to grow rapidly in the south west corner of the airport. We need further details of proposals to ensure that HGV journeys to and from Heathrow are kept off residential streets and out of town centres such as Staines-upon-Thames. We support further investigation of Spelthorne Borough Council's suggestion of a non-road cargo link under or over Southern Perimeter Road to help reduce freight movements. Increased traffic around the airport, especially heavier freight vehicles, could affect road condition and have maintenance implications for the council.

We would like to see a firm commitment from HAL to support low emission freight vehicles. The whole of Spelthorne is an Air Quality Management Area (AQMA), where air quality does not meet minimum government thresholds. We urge Heathrow as a large-scale fleet operator to put itself at the forefront of the trial and development of low emission fleet vehicles, challenging the vehicle manufacturing industry to accelerate the introduction of viable electric and low emission vehicle products in support of the UK Government's Industrial Strategy and Road to Zero Strategy.

There needs to be a strong commitment to open data for transport and this is a particular issue with freight where information is not shared due to issues with commercial sensitivities. Sharing data is essentially the only way to understand the airport operations and propose suitable mitigation and we expect HAL to take a lead on this.

On vehicle call forward facilities, we would like to see the process for booking a slot at the cargo centre used to ensure compliance with vehicles waiting in the call forward facility rather than local streets. We suggest that the role of fleet-tracking GPS be explored to see if it offers any advantages to dynamically managing demand as well as ensuring compliance with no waiting on local streets.

Air Quality (Feedback question 13)

The following comments on this topic can be summarised in two key points:

1. The need for more information on transport modelling to fully assess the impact on air quality.
2. The need for more information on construction to enable an informed view of the likely effects to be developed.

Air quality is an area of concern for this council because of its impact on public health. The DCO boundary is surrounded by AQMAs and the whole of Spelthorne is an AQMA. The Stanwell area could be significantly impacted because of the increase in airport related road traffic to the south and west of the airport and construction activities including the expected location of construction supporting sites.

The ANPS requires Heathrow to demonstrate that, with mitigation, the airport expansion scheme will be compliant with legal obligations that provide for the protection of human health and the environment. The air quality impacts of the expanded airport will largely depend on the surface

access proposals and so until more information is available from detailed transport modelling it is not possible to develop an informed view of the likely significant effects.

Currently, HAL's construction proposals are generally high level and are considered to be standard proposals expected to apply to any major construction project. Much detail still needs to be worked through and there are references in the consultation documents to workstreams and documents that will be submitted with the DCO. Again, until more information is available it is not possible to develop an informed view of the likely significant effects.

We are concerned that current assessments are constrained to breaches of limit values and that HAL seems to be pursuing a narrow focus on whether the proposals will create or delay compliance of air quality zones with legal limits. We would like to see the aim go beyond compliance and for HAL to commit to supporting progressive reductions in air pollutants in areas currently below the thresholds, not just avoid contributing to exceedances of maximum legal limits, given that initial results in the Preliminary Environmental Information Report (PEIR) show widespread and long term increases in air pollution around the airport. We would like to see a firm commitment from HAL to support low emission buses and freight vehicles.

Ultrafine particulate pollution from aircraft is now recognised as affecting lung health and particularly populations up to several kilometres downwind of airports. While no 'standards' exist for this pollutant at present, given the scale of expansion proposed, we would like to see the potential ultrafines emissions and impacts on local air quality be assessed.

Noise (Feedback questions 6,7,8,15,16)

The following comments on this topic can be summarised in four key points:

1. Whether the recovery period should count towards the 6.5 hour ban period.
2. The design of any noise envelope must go beyond maintaining the 2013 baseline and should reflect sensitivity testing of various noise metrics and future fleet mix because of the impacts of noise on health.
3. The noise envelope should be subject to regular review at least every 5 years.
4. Any early growth must be subject to binding conditions to manage noise including no additional runway landings or take offs before 06:00.

Night flight ban

We would question whether HAL is proposing a full 6.5 hour scheduled night flight ban. Whilst we acknowledge that HAL's runway alternation proposals could potentially give communities close in to the airport at least a 7 hour respite period (other than dispensed flights) between 22:00 and 07:00 it will include night flights on some days, and in areas further out from the airport up to the 4,000 ft contour (and beyond), which includes many parts of north Surrey, communities may not receive 6.5 hours without overflights (other than dispensed flights) during the night period. In our response to the Airspace and Future Operations consultation earlier this year, we commented on the fact that the runway time is approximately 15 minutes earlier than the scheduled time on arrivals and 15 minutes later on departures so that a 6.5 hour scheduled night flight ban means local communities could actually experience noisy overflights for a shorter period.

This is likely to have come as a surprise to many of the public, who may feel they were misled by HAL's Consultation One in 2018 where the main consultation document asked for feedback on the timing of the proposed 6.5 hour scheduled night flight ban in the night period but failed to make this clear. In this consultation we now learn that HAL is essentially treating the recovery period to deal with delays - between 23:00 and 00:00 (albeit with some restriction on numbers and types of aircraft) - as part of its normal operating day (Timing of Runway Mode Allocation Changes section in the Future Runway Operations consultation document). This means that the effective no operation period in which the only aircraft allowed to fly will be those that have been dispensed under the rules for exceptional circumstances actually lasts for 5.15 hours from 00:00 – 05:15.

Therefore, we would question whether the recovery period should count towards the ban period. We expect a full 6.5 hour period when only dispensed flights would be acceptable. We also consider that the statement in the Future Runways Operation consultation document which states at para 4.6.4 that “options which do not allow for scheduled flights between 05:30 and 06:00 will mean that we cannot provide 740,000 flights a year” somewhat misleading as this is dependent on the options tested for the timings of the ban. We note that the Airports Commission recommended a scheduled night flight ban from 23:30 – 06:00 given the evidence of the greater health impact of noise on sleep disturbance in the early morning, but from the documentation this timing does not appear to have been tested.

Noise envelope

The ANPS states that the noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission (with reference to the 2013 baseline for the 54dB_LAeq,16h noise contour assessed by the Airports Commission where LAeq,16h indicates the annual average noise levels for the 16-hour period between 0700 – 2300). We consider that the design of any noise envelope must go beyond maintaining the 2013 baseline.

Some noise experts are of the view that the 2014 Survey of Noise Attitudes (SoNA) needs updating to test whether 54dB_LAeq,16h is still the right level for determining the onset of significant annoyance and 51dB_LAeq,16h appropriate for the Lowest Observed Adverse Effect Level (LOAEL), and we note that they are higher than recent WHO guidelines. Because of the noise impacts on health and the fact that this is an area that is still little understood, especially in relation to mental health, we expect HAL to undertake comprehensive sensitivity testing to assist the design of the noise envelope that looks at other metrics including the WHO guidelines and levels below 51dB_LAeq,16h, frequency of overflight, L_{max} and ‘single mode’ operations (to avoid disadvantaging communities who currently only get overflights on easterlies - 30% of a typical year - but this is not reflected in noise contours that average out over a year). Furthermore, it is important to demonstrate that the assumptions around improvements in aircraft technology and future fleet mix are robust or apply sensitivity testing. The noise envelope should be subject to regular review at least every 5 years.

We expect that only the quietest aircraft will operate during the night period and that Heathrow should progressively reduce the amount of quota available for the period outside of any no operations period.

Noise insulation policy

We support the proposed changes to the noise insulation policy in line with ANPS para 5.245 and that it should also be subject to regular review.

Early growth and Independent Parallel Approaches (IPA)

HAL indicated in Consultation One that they were looking to deliver early growth to provide up to an additional 25,000 ATMs a year on Heathrow’s two existing runways and that this could form part of the application for development consent. Early growth is dependent on the use of IPA. This is a serious concern for many residents of Surrey. It could potentially impact on areas of Surrey Heath, Woking, Spelthorne, Runnymede, Elmbridge, Epsom & Ewell, Mole Valley and Reigate & Banstead. Many residents that previously would have had respite when the wind changed direction will no longer benefit and will be subject to adverse noise impacts from departing and arriving aircraft overhead. The council does not support IPA as it would represent a worsening of the current situation for many local communities and could have health impacts.

HAL’s analysis, based on various assumptions, indicates that early growth would result in more people being newly exposed to noise levels above the 51dB_LAeq16h daytime LOAEL than without early growth and that some of these will be Surrey residents. We do not consider there to be any national policy basis in either the ANPS or Government aviation policy for early growth (see our later comments on early growth). However, if early growth is to be allowed as part of the DCO, then it must be subject to binding conditions to manage noise including no additional runway landings or take offs before 06:00.

Construction

As indicated above, currently, HAL's construction proposals are generally high level and are considered to be standard proposals expected to apply to any major construction project. Significant noise impacts on residents in the Stanwell Moor/Stanwell area of Spelthorne are indicated in some of the consultation material which will need to be mitigated and residents compensated for, but more information is needed.

Carbon emissions (Feedback question 12)

The Committee on Climate Change (CCC) is expected to report in the autumn setting out its recommendations for the aviation sector consistent with delivering the Government's recently legislated target for net zero carbon by 2050. We expect these recommendations to be taken into account in the Government's final Aviation Strategy for 2050 and there may be a requirement for the ANPS to be reviewed. Therefore, this will be a key consideration in determining whether the DCO application is acceptable in terms of its impact on the ability of Government to meet its carbon reduction targets that HAL will need to address.

More details are needed on the design and construction of airport infrastructure in relation to reducing carbon emissions and a stronger commitment from HAL to public transport and active travel measures.

Biodiversity and ecological conservation (Feedback questions 12 and 22)

The following comments on this topic can be summarised in four key points:

1. The need for more information on mitigation and compensation measures to enable us to understand the likely impacts and the area of land required.
2. The need for areas of mitigation and enhancement which are part of the Masterplan to be included in the proposed DCO boundary.
3. The need for greater detail on the assessment around bird strike risk, which is an important consistency issue for this council given the work we carry out with HAL in this area.
4. The need for further detail as to how habitat compensation land can be both managed and protected to ensure additional liabilities do not fall on local authorities.

In relation to the biodiversity and ecological conservation aspects of the expansion proposals, much of the detail remains to be worked up with some ecological surveys still ongoing and mitigation and compensation measures yet to be developed. We are also concerned that there will be insufficient time in the process to influence proposals for biodiversity and ecological conservation and that, without precise information as to the extent of impacts, the area of land required to ensure the mitigation and compensation is unclear. Proposals are light in relation to biodiversity net gain.

The PEIR (Non Technical Summary Section 4.2 Biodiversity), includes a table of biodiversity impacts considered to have significant negative effects. Following the mitigation hierarchy, as required by the ANPS para 5.94, where impacts cannot be avoided, they should then be mitigated and finally compensated. For this DCO, the emphasis is on the mitigation and compensation measures. These are critical for ensuring no net loss of biodiversity and creating net gains and any uncertainty on whether such measures can be delivered will mean the scheme is unable to comply with the ANPS requirements.

We are concerned that the preferred Masterplan includes areas of mitigation and enhancement outside the proposed DCO boundary. Great emphasis is made of the role of green infrastructure in mitigation and enhancement and the role of the Green Loop, but parts of this are also outside the DCO boundary. During consultation, HAL stated that such areas would be included within the DCO boundary and we consider that the DCO boundary needs to include these areas if there is to be certainty that the measures can be achieved. We also query whether the Green Loop is wide enough to function properly, specifically as a wildlife corridor, in Spelthorne.

The proposed modifications to watercourses, creation of flood storage and treatment areas and overall changes to the water environment adjacent to the airport may result in increased birdstrike risk. No assessment of risk appears to have been included. In particular the proposed water

treatment facility would on the face of it appear to conflict with birdstrike precautions on which Surrey County Council works very closely with HAL to ensure both safe skies and good quality environment on the ground. An explanation of why this facility is proposed in this location and the acceptance of it, would be welcomed.

Further detail is required as to how habitat compensation land can be both managed and protected to ensure additional liabilities do not fall on local authorities. There will also be a need to monitor impacts on habitats and species and the success of the mitigation and compensation measures and this needs to be clarified.

Land use including open space, green infrastructure and Green Belt (Feedback questions 12 and 22)

The following comments on this topic can be summarised in four key points:

1. The need for more information to demonstrate how new green infrastructure outside the proposed DCO boundary will be delivered.
2. The need for more more detail on how the loss of open space resulting from expansion within Spelthorne will be mitigated.
3. The need for any implications on the ability of Hithermoor Quarry to be used for the processing of minerals from King George VI Reservoir to be appropriately assessed.
4. A number of mineral restoration schemes are due for completion during the proposed construction period. Much of the biodiversity and recreational mitigation being offered is already being provided through restoration and we need to see details of the mitigation being provided over and above the approved restoration scheme.

General

This council is very concerned that not all land to be assembled for necessary mitigations is included within the red line DCO boundary and questions how it will be secured if not included. We also have concerns about the loss of public access to Hithermoor and HAL need to clearly demonstrate that adequate mitigation will be proposed for this loss. HAL need to provide much greater detail on the enhancements that are proposed to mitigate the loss of open space generally within Spelthorne.

Mineral sites and restoration plans for green infrastructure

Surrey County Council strongly disagrees with proposals set out within the PEIR to disregard aggregate recycling capacity at Hithermoor Quarry. Although Hithermoor Quarry has a time dependent permission, the site is identified in the adopted Surrey Minerals Plan as the preferred location for processing of material from the King George VI Reservoir allocated mineral site and the council has entered pre-application discussions with the operator of the site regarding use of this land for processing of material from the reservoir, as well as an extension to their current aggregate recycling activities. It is possible the extension of aggregates recycling activities could be sought for a period of 15 years. The council considers that the impact of including this land within the DCO project has the potential to be significant and should not be ignored, especially given the context of the adopted Surrey Minerals Plan. We consider that any implications for the ability of this site to be used for the processing of material from King George VI Reservoir must be appropriately assessed.

We consider that there is a need for HAL to discuss with this council any proposed alterations to agreed restoration schemes, including at Hithermoor, Stanwell Quarry, Homers Farm and Hengrove Farm and what compensatory provision is to be provided. We welcome confirmation that the restoration status of sites will be the baseline and discussions are now urgently needed to agree the enhancements and benefits to be delivered over and above what the restoration scheme would achieve. Mitigation and compensatory provision must be local to the site impacted. Part of the Hithermoor site has been subject to longstanding restoration and woodland planting and there would need to be additional environmental compensation for losses (taking into account woodland has amassed years of growth).

We support Heathrow's intention for mineral to be won from the relevant sites in advance of Heathrow related development. The PEIR acknowledges that the operator has begun extracting sand and gravel from the Homers Farm, Bedford site. The PEIR considers that mineral will have

been fully won from the site prior to development. We would urge HAL to engage now regarding any alteration to the current restoration scheme in place for the site, for example regarding backfilling of voidspace.

We refer you to the approved restoration plans for the sites referenced below (which we can supply if needed):

- **Zone H** - Homers Farm Quarry is affected here. This is a current operational site that is due to be back filled and restored to agriculture, with restoration due for completion by September 2020. The site is now proposed in the preferred Masterplan to fulfil drainage and pollution control infrastructure provision. Whilst this proposal recognises the constraints of the Southampton to Heathrow Esso pipeline, there also exists a Thames Water high pressure main that has pressure plug features which are dependent upon the weight of material over the pipeline to maintain that pressure. There is no detail of what exactly the drainage and pollution control proposals actually involve and there could also be a birdstrike issue to consider.
- **Zone J** - Stanwell Quarry is affected here. This is consented to 2027 (principally the recycling plant), but there is a phased restoration with much of the quarry already restored or expected to be in advance of that date. The council welcomes the fact that the scheme does now include most of the footprint of the Stanwell Place historic garden. However, the most recent time extension permission did include the north west part of the site changing from agriculture to create a new extension to the historic gardens and amenity area as a key component of the restoration design of the site. If this area is now to be lost through the DCO scheme it will need to be mitigated.

The proposed diversion of the Duke of Northumberland and Bedford Rivers together with greenspace alongside is also welcomed. Given the green space provision to the north and the Green Loop proposal that appears to affect the southern end of the site, it would seem logical to include this area to link greenspace provision within the Masterplan. The historic garden has water features that were originally fed from the Northumberland and Bedford Rivers and the opportunity should be taken to connect these to provide a circuit of water supply to the gardens.

The scheme does wipe out some of the biodiversity and open space enhancements being delivered through the restoration of the site and we would wish to see that this is expressly mitigated and compensated for. On the face of it, the new greenspace along the realigned rivers would do this, but it is not clear whether this is compensation for the loss on the site or from elsewhere in the scheme. Figure 7.5.1 in the Preferred Masterplan document shows an attenuation basin on the site which is not shown on the zonal plan, whilst figure 7.10.2 shows a noise attenuation bund proposal over the historic garden, which again is not shown on the zonal plan.

- **Zone K** - Hithermoor Quarry is affected here. The majority of the site (excluding the recycling/processing hub) is already close to restoration. Much of what is being offered as greenspace and biodiversity enhancement is already being delivered through the site's restoration. It should be made clear in the proposal, what *additional* provision the Heathrow scheme is making to this. The public open space for wildlife and people to the north west of King George VI Reservoir conflicts directly with the proposals for working the reservoir for mineral, being the area identified by the company for silt disposal. This could be an appropriate proposal for the use of the site, however, once extraction has ceased. The large drainage and pollution control facility being proposed on the site would wipe out the Tom Rod SSSI quality grassland site (which would need to be compensated) and raises the significant issue of birdstrike.
- **Zone U** - Hengrove Farm Quarry is a new affected area. Again, the expansion proposals ignore the fact that the restoration proposal for the site, which will be completed in advance of expansion, would deliver much of the scheme. Restoration is due for completion by the end of 2020. As elsewhere, this proposal could be integrated with the wider area to create a big open space/habitat area with Shortwood Common to the west and Hengrove Park to the east.

Resource and waste management (Feedback question 12)

The following comments on this topic can be summarised in three key points:

1. There are insufficient measures in place to mitigate the identified potential significant adverse impacts of the DCO project.
2. The need for more information in relation to construction and waste management and for more detailed evidence to support the assumptions regarding the amount of waste arisings to be diverted from landfill, especially with regard to hazardous waste.
3. The need for more information on the implications for C,D &E waste and the specific implications arising from the early closure of Stanwell Quarry.

We are concerned that the waste chapter of the PEIR states that there will be a significant adverse impact on landfill capacity during phase 1 of construction, including for hazardous waste and also that the project will result in a significant adverse impact on non-hazardous waste capacity during the operational phase if the Lakeside energy from waste facility is not relocated. At para 20.8.15, the PEIR states that local authorities will account for the loss of capacity at hazardous and non-hazardous landfill sites and waste treatment facilities resulting from the expansion project through allotting more capacity in their Waste Local Plan updates. Para 20.13.1 states that there will be no additional measures or compensation for the likely significant effects of the DCO project. We are concerned that at present there are insufficient measures in place to mitigate the identified potential significant adverse impacts of the DCO project.

Assumptions have been made regarding the amount of waste material to be diverted from landfill via reduction, reuse and recycling which are based on best practice. Assessment of impact is based on these assumptions being realised. We are concerned that there is insufficient detail in the evidence provided to demonstrate that this will be the case, especially with regard to hazardous waste. Advance sight of the commitments and proposals to be included within the DCO and Environmental Statement is needed. Further detail is also required regarding how waste will be transported to management facilities.

The PEIR states it is only possible to provide an assessment for CD&E waste in broad terms due to lack of detailed design and phasing of works and we are concerned that as this work has not yet been carried out the assessment of potential adverse impacts is inadequate. We would also query how prevention activities have been calculated, it is stated that it is based on 'modest' assumptions, but further detail is requested.

We consider that insufficient evidence has been provided to indicate that the early loss of Stanwell Quarry as a waste facility would be neutralised by provision of additional CD&E waste management as part of the expansion project and it should be noted that the planning permission for the facility does not limit waste to originate only from Heathrow. There is also a need for more CD&E waste recycling capacity in Surrey and the premature closure of Stanwell Quarry would make this need more acute. The implications need to be appropriately assessed.

The draft Code of Construction Practice states that Site Waste Management Plans are to be produced in line with the Resource Management Plan. Site Waste Management Plans will include the permitted arrangements for onsite and offsite waste treatment, waste transfer and waste disposal. The council supports this, but is concerned that further work needs to be undertaken to understand how it will all work in practice.

We ask for a firm commitment that rail waste transport is favoured over road transport where reasonably practicable.

Flood risk (Feedback question 12)

The following comments on this topic can be summarised in three key points:

1. The need for more information if this council as Lead Local Flood Authority is to accept that the expansion proposals will have little significant impact on flood risk in Surrey.
2. Assessments of risk which use assumptions of future mitigation measures (as yet undeveloped) should apply the precautionary principle and conservative approach rather than assuming that these measures will result in no significant impact.

3. All infrastructure including water storage/treatment areas which is necessary for the operation of the airfield should be included within the overall DCO boundary.

Much of the work required to fully assess impacts is yet to be undertaken and the assessments to date are based on assumptions that future work will provide suitable adequate mitigation. This may be the case, but a precautionary approach should be used at this stage and a worst case scenario assumed when assessing risk related to the water environment and flood risk.

Whilst we appreciate that the PEIR is taken at a snapshot in time and not all relevant information will be available to make assessments, a large amount of the baseline assessments are made using historic desktop study information rather than qualitative data on the existing situation. Instead, a general assumption has been made that all flood risk impacts will be resolved using mitigation measures which will not affect location or scale of development. This is not our experience based on other development. Flood risk mitigation requires detailed assessment and mitigation measures frequently require significant land use in specific locations to achieve sustainable drainage using gravity rather than pumped systems. It is difficult for this council as Lead Local Flood Authority to agree with the conclusions that there will be little significant impact on flood risk especially as there is little detail on the final proposals or mitigation measures proposed.

No details of the flood storage area capacities, attenuation area sizes and final locations, discharge locations, and final watercourse flow regimes have been provided. Again, this makes it impossible for the authority to conclusively agree with the outcomes of no significant effect presented in the PEIR for flood risk or drainage implications. The hydraulic modelling is not yet complete and therefore it is not possible to satisfactorily say what the level of residual risk will be or what mitigation may be required, or if the sequential or exemption tests are likely to be met. To provide any meaningful comment, we need much greater detail, including Flood Risk Assessments, GIS shapefiles of alignments, mitigations and likely structures and barriers. All of the options will need a full analysis to determine the preferred option with lowest risk, best environmental gain and overall balance versus cost/disruption and mitigated impact.

The Drainage Impact Assessment is a qualitative assessment rather than the quantitative one required to demonstrate that the site will be drained adequately and meet the requirements of not increasing flood risk on site or elsewhere. No opportunities for reducing flood risk have been incorporated into the proposal or even evaluated to show whether they are feasible; this goes against NPPF paragraph 157 (c).

The approach to surface water drainage being undertaken is for bookending of drainage outflows: the lower end is the greenfield rate as set out by Defra National Surface Water Drainage Standards (and represents the key requirements which need to be met by the DCO proposal), the upper end is no increase in runoff. However as infiltration is unlikely to be an option across the whole site (due to high groundwater levels, contaminated ground or clay strata), attenuation space is required to restrict flows to either of the two bookends above. The amount of land allocated to each parcel for attenuation space is therefore vital in determining whether a site will discharge drainage at the upper or lower bookends (i.e. if not enough attenuation space is allocated then only the upper bookend becomes technically feasible).

For the drainage of the runway, terminals and main airside activities it appears space has been allocated solely to meet the upper bookend – this means there will be no reduction in flood risk. This is likely because of the large flows (and therefore attenuation space) involved and therefore may be justifiable. Currently, no qualitative evidence has been provided in terms of the flows themselves or the land take allocated to storage. No attenuation information has been provided for other scheme components, including the Southern Parkway, but the space allocation for these must be provided and the amount allowed for will dictate which of the upper or lower bookend of discharge rates is met and whether there will be opportunities for any sites coming forward to meet the Defra standards that discharge ‘must be as close as reasonably practicable to the greenfield runoff rate from the development’.

As Lead Local Flood Authority, Surrey County Council consent any changes to non-main rivers within the county, therefore detailed discussion around proposals will be required. The consents need to ensure that the requirements of the Water Framework Directive are met.

Water quality and resources (Feedback question 12)

The following comments on this topic can be summarised in four key points:

1. The need for more information on mitigation measures to enable an informed view of the likely effects to be developed including as to how any risk of downstream pollution from surface water attenuation features will be avoided.
2. The need for more information on measures to mitigate the hydromorphological impacts of the proposed river diversions.

The Water Framework Directive (WFD) assessment has assumed that the water quality and water quantity impacts are able to be mitigated through unidentified future works. This does not accord with the precautionary principle. This also applies to the assessment of the Covered River Channel which is an untried and untested approach and we believe that as such it is not appropriate to assume that “on the balance of available evidence at this stage, it is considered possible that the current concept design could satisfy the criteria.”

Currently, as impacts are likely to occur for which adequate mitigation has not been proposed or identified it is likely that the conditions set out under Article 4.7 of the WFD will have to be met to show that the development is not in breach of the WFD. This is not addressed in the PEIR and again has been delayed to a later stage.

There is an assumption that land which has previously been contaminated or used as landfill could be used as flood storage/water treatment areas; this is yet to be agreed with the Environment Agency and represents a significant risk.

Further detail is required as to how any risk of downstream pollution from surface water attenuation features will be avoided.

Geomorphology and river modification

The expansion obviously results in huge disruption to the geomorphology of the hydrological system. Whilst lots of these historic channels are manmade they have become naturalised over time and hence the impact caused by diverting, combining and eventually separating using flow structures is potentially substantial. Indeed, the PEIR rightly identifies that there is a risk of high impact to hydromorphology as a result of these diversions. However, as the list of additional environmental measures required to mitigate them has not yet been finalised nor the feasibility of any measures tested, we do not believe that the PEIR has adequately demonstrated that the risk of these impacts can be mitigated and that it cannot be deduced there will be no significant effect on these watercourses as a result of the construction activities.

Historic environment (Feedback questions 12 and 18)

The following comments on this topic can be summarised in two key points:

1. The need for more information especially in relation to evaluation to accord with the nationally-accepted processes of assessment-evaluation-mitigation set out within the NPPF.
2. The need for site specific impact information and archaeological impact appraisals for affected areas within the county.

The PEIR information provided is a mixture of the comprehensive and the generic. It is comprehensive in its identification of the issues and the spread of information accessed and referenced, but it falls short of the depth of information expected in a sitespecific Heritage Statement or archaeological Desk-Based Assessment and deals with many of the issues in a generic, conceptual manner, citing future, and as yet,unavailable reports. Still to be provided is site specific development and ground impact information as well as the terms of the archaeological investigation and historic building recording that are to come.

It is not entirely satisfactory that this PEIR stage of reporting is all that will be available prior to mitigation works being developed. We suggest that despite the wide ranging nature of the information presented, the approach falls short of the nationally accepted processes of assessment-

evaluation-mitigation set out within the NPPF. Any attempt to bypass the evaluation stage is unacceptable and would require detailed justification.

Proposals within Surrey appear to offer possible scope for preservation *in-situ* through re-siting or careful foundation design should archaeological remains be present. We would highlight that the Southern Parkway is proposed partially within a county-designated Area of High Archaeological Potential. The Archaeological Survival Model presented within the documentation does not have the correct Surrey Areas of High Archaeological Potential depicted and should be updated. Unknowns remain and for all impacted sites we will need to understand the direct nature of the impacts proposed, whether or not further assessment and/or evaluation of the site(s) will be required for archaeological purposes to determine if remains are present and whether or not preservation *in-situ* is desirable or indeed, achievable. Surrey County Council will be seeking site-specific impact information and archaeological impact appraisals for affected areas within the county.

HAL should be mindful that some of the Green Loop and other mitigation proposals might themselves impact on archaeology and heritage, and therefore ensure this has been taken into account through impact appraisal. This should include details of the possible hydrological impacts on any buried archaeology through proposed river diversions. This might require the implementation of a medium to long term monitoring programme, and the development of a contingency excavation resource should previously stable sites be found to be dewatering.

In line with the advice being given by Historic England and practices set out in the national planning legislation and guidance, we will require pre-determination archaeological evaluation of threatened sites, unless a different approach can be demonstrated as providing either a superior return on archaeological data, or there is the opportunity to divert significant resources into alternative heritage benefits for the county with little or no loss of archaeological information retrieval.

It is encouraging to note that heritage concerns are being integrated into the landscape and community considerations.

Dust, odour, artificial light, smoke and steam (Feedback question 12)

There is a need for much more information on construction. We have concerns that much of the detail on working hours for individual sites will be included in the Code of Construction Practice to be submitted with the DCO. Discussion around such key issues needs to take place in advance of DCO submission. The potential for temporary relocation of residents in Stanwell and Stanwell Moor will be linked to details such as whether 24/7 working is in operation and this information must be made available at the earliest possible stage.

We wish to highlight that the baseline for lighting impact at the Southern Parkway should be the restoration scheme, not the current mineral workings.

Community compensation (Feedback questions 20 and 21)

The following comments on this topic can be summarised in three key points:

1. The Community Fund must not be used to deliver mitigation required to make the proposals acceptable in planning terms, but should compensate those impacted by expansion.
2. The need for a clear governance structure to be in place for the Community Fund with a body having oversight of the overall Fund and its long term planning, the allocation of spend, and monitoring and reviewing individual projects.
3. The WPOZ should be extended to include Stanwell Moor and large parts of Stanwell and a local health impact assessment undertaken for each of these communities.

We would like to stress that the proposed Community Fund must not be used to deliver mitigation required to make the proposals acceptable in planning terms. For this reason, we oppose the use of the community compensation scheme to fund the Unforeseen Local Impacts Mitigation Strategy (ULIMs) as set out within the Environmentally Managed Growth proposals. The distinction between compensation and mitigation must be maintained. The approach to ULIMs will reduce the amount of

funding for wider community schemes and potentially absolves HAL of the need to deliver mitigation required in planning terms. This is in addition to significant practical issues around the ULIM proposals, including the proposed annual funding approval process and the need for mitigation schemes to compete against each other for funding. If schemes are required to mitigate impacts, they are all essential.

It remains difficult to comment on the geographical area that the fund should cover without detailed information of the noise impact of an expanded Heathrow. There is a clear role for the fund during construction, so work must be carried out early on to ensure the fund is up and running immediately post DCO determination.

A clear governance structure needs to be in place for the Community Fund with a body having oversight of the overall Fund and its long term planning, the allocation of spend, and monitoring and reviewing individual projects. Careful consideration needs to be given as to how community involvement in the Community Fund is guaranteed. There must be local authority political representation on the assessment panel. HAL may benefit from having discussions with Community Infrastructure Levy collecting authorities who will have useful learning from administering the spend of CIL receipts.

We again highlight that there must be additional compensation specifically for the residents of Stanwell Moor and large parts of Stanwell, who will experience prolonged quality of life and potential health impacts given the long construction period and the increase in airport operations. Assessments in the documentation point to the fact that residents in these areas will be exposed to temporary unacceptable levels of noise during construction, especially construction of the Southern Parkway, a major new roundabout junction at Stanwell Moor and realignment of the A3113. They will also be newly exposed to more aircraft noise from planes on the runways and taxiways as well as overhead once the expanded airport is operational and the number of ATMs increases. Air quality can also be expected to be poorer as a consequence of these activities. There are references to the need for temporary re-housing in the consultation document that focusses on the specific impacts on Stanwell and Stanwell Moor, but with no further detail on eligibility for compensation, which we do not consider to be acceptable. In our view, the WPOZ should be extended to include Stanwell Moor and large parts of Stanwell. We consider that there needs to be a local health impact assessment for each of these communities so that the combined and cumulative effects of HAL's proposals on residents can be fully understood.

Skills (Feedback question 17)

The following comments on this topic can be summarised in the following key point:

1. The need for more engagement and collaboration to deliver apprenticeships and skills training, engaging with SMEs and attracting inward investment to Surrey.

Surrey County Council would value the opportunity to comment in more detail on the draft Apprenticeship Plan, detailing how HAL will achieve its targets, before it is published in the Economic Development Strategy by the end of 2019. For example, we value HAL's focus on enabling more vulnerable people to access sustainable and rewarding employment and would recommend that the Apprenticeship Plan defines what percentage of the 10,000 apprenticeships will be allocated to train and support vulnerable young people and adults in pre-apprenticeship schemes and directly in apprenticeships. Also, how will HAL continue to support these individuals into sustainable employment either as part of its own workforce or with local employers?

We recommend opening up a dialogue with other parties about skills including Surrey's education sector (not just those within the Heathrow core study area) and with the wider construction/infrastructure sector such as the Strategic Skills Forum for Construction to:

- identify opportunities to expand and grow leading-edge education and training provision for construction at all levels/programmes, within Surrey institutions and providers (beyond the current skills partnership group) and in collaboration, for example with existing programmes such as <https://www.surrey-ia.org/>;

- to universally make the construction sector a highly attractive career proposition for young people and adults, including those from diverse backgrounds, and providing clear pathways to career progression; and to
- understand the impact of population growth (both transient and permanent workers) on the county of Surrey (not just the core study area) and its resources.

This needs to be done in collaboration and within the context of the wider needs of other major future infrastructure/built environment projects in the South East.

We support HAL's commitment to the early adoption of T-levels starting in 2020. However, it is unclear if the proposed 1,200 work placement days for T-levels is for the academic period 2020-2022 only. If so, this equates to approximately 20 pupils (completing a 45 – 60 hours workplace), during their two year course. What is the expected yearly level of work placements beyond 2020?

We welcome that the skills transfer passport will be jointly co-designed with other sector employers to meet the needs and requirements of future UK infrastructure and construction projects. The data collected could also help to proactively identify future skills gaps and enable strategic planning of education provision. In addition, to the 'world of work' we would encourage HAL to create programmes to inspire, attract and support adults seeking a career change.

We support HAL's current approach to engaging with SMEs and the plans to expand the programmes and would encourage HAL to work with Surrey County Council, Surrey Chamber of Commerce, Surrey districts and boroughs and the LEPs to ensure that engagement is made with SMEs across Surrey.

HAL states it will continue to work with partners to help secure inward investment through a range of initiatives such as sectoral initiatives, marketing initiatives, town centre improvements and place making. We would support this objective and would like HAL to provide more details on how this will be done. HAL needs to continue to work with Surrey County Council, Surrey districts and boroughs and the Enterprise M3 Local Enterprise Partnership to ensure that any additional inward investment activity is coordinated with what is already being carried out.

As specified within the ANPS, the employment and skills measures proposed by HAL need to be tracked through a monitoring framework and this must have a clear baseline position.

We stress the importance of surface access improvements for access to skills and job opportunities and are slightly concerned that the surface access modelling for the scheme assumes a rapid focussing in the distribution of colleagues' home locations to the east of the airport, which does prompt questions around the economic benefit of expansion for the south west corner in terms of direct job creation.

Assessment principles (Feedback questions 12 and 14)

The following comments on this topic can be summarised in three key points:

1. A need for further engagement with Surrey's Local Resilience Forum.
2. The need for clearer articulation of how health effects are assessed, in particular why moderate effects are all deemed not significant.
3. The need for the detailed methodology for predictive modelling of health effects to be provided.
4. The need for a separate local health impact assessment undertaken for the communities of Stanwell and Stanwell Moor.

Security and safety considerations

In Surrey, the Lower Thames Catchment is the main area of risk for flooding in the county and since 2008 we have had three significant flood incidents in that area, the most impactful in 2014. On this basis, the national risk is reflected locally and the assessed risk for Surrey of fluvial flooding is very high particularly in this area of the county. If the construction phase for the Heathrow expansion is to run to post 2030 it is likely that there will be a significant flood event in the Lower Thames area and this needs to be taken into consideration.

Clarity is required as to who will be preparing the emergency response plans and how they will link to local off airport arrangements. There also needs to be greater clarity on whether incidents in the area are an airport lead response (under Emergency Orders CAP 168 chapter 8) or for the local response plans for the Local Resilience Forum (LRF) partners. Further engagement is needed with Surrey's LRF.

Health

We welcome the fact that the PEIR makes use of the WHO definition of health and the wider determinants of health model. Within the PEIR it is not clear how professional judgement is used to determine whether factors are major/moderate/minor effects and also whether these effects are then significant. All moderate effects have been deemed not significant and the narrative to support why this decision has been made is not clear. There needs to be a narrative to link the methodology set out in Chapter 5 – which clearly shows the elements that will be considered in the assessment, with the final decisions of significance, as the thread is not clearly articulated in the PEIR. Moderate effects are potentially significant – for example, school displacement is only deemed significant for vulnerable groups, but impact on education of disruption could be across the population. Therefore, the professional judgement on significance of effects needs to be transparent and clearly articulated.

In relation to active travel, Spelthorne Borough Council is the most deprived community within the study area. The PEIR clearly sets out the link between lower incomes and reliance on active travel and that Stanwell and Stanwell Moor are community areas where active travel routes will be affected by the DCO. The PEIR also confirms that the strength of evidence is strong for a direct causal relationship between use of active travel and health outcomes and both national and local policy supports active travel. However, for vulnerable groups the impact is assessed as moderate negative (not significant) to minor negative (not significant) and it is not clear how assessors have determined the effect to be not significant. It is unclear whether a factor deemed to be not significant, would result in no mitigating measures being put in place to prevent potential negative impacts on health.

In relation to formal open space, it is specified that local re-provision of formal open space will be 'suitable' to the remaining population's needs. We request further information as to how 'suitable' provision will be determined and the evidence that will be used to support this.

We note that many of the key environmental measures were not in place before the PEIR was undertaken but should be available to inform the Environmental Statement. Therefore, the PEIR was not able to assess how these policies and strategies might mitigate impact. This makes it difficult to make an accurate assessment of the impact of these factors. It is not clear in the PEIR how the unintended health consequences will be minimised and how the beneficial health impacts maximised. It is important that the PEIR findings influence and feed into development of the key environmental measures (both embedded and additional measures) to ensure they maximise the opportunities to mitigate negative health impacts as well as maximise any potential positive impacts.

Inconsistencies have been noted in the reporting of some of the baseline data. In some cases the data for a specific indicator has been reported at borough level and county/sub-borough level for others. For example, in section 12.10.146 the prevalence of obesity or being overweight and inactive adults are reported for Spelthorne at borough level, however the data for residents' use of outdoor space has been reported at Surrey county level. We acknowledge that this could have been because the data for this indicator was not available/published at borough level, however in such cases it should be stated clearly and acknowledged that county level data may not always be representative of the borough/ward level population characteristics. We also note that some of the strategies referenced for Surrey are out of date (see <https://www.healthysurrey.org.uk/about/strategy>). The methodology describing the future health baseline assessment in chapter 5 of the PEIR is also unclear.

There is inadequate use of referencing to the sources of scientific literature and data sources within the report. This is important to enable cross checking of the evidence and also assess the type of evidence used (based on its strength and quality).

The cumulative and combined effects on the health of specific populations needs to be clearly assessed. We would like to see a separate local health impact assessment undertaken for

communities most affected around the airport at both construction and operation stages. Within Surrey this should include Stanwell and Stanwell Moor.

We would also refer you HSPG's draft position paper on public health principles especially in relation to producing a health management plan and construction (http://www.heathrowstrategicplanninggroup.com/application/files/3915/6101/6919/HSPG_Position_Paper_-_May_2019.pdf).

Environmentally Managed Growth (Feedback question 12)

HAL's proposals for Environmentally Managed Growth (EMG) highlight that the operational aspects of the expanded airport will have significant impacts for local communities and the ANPS is clear that expansion should only be allowed if these impacts can be managed within acceptable limits and every effort made to reduce, mitigate and compensate for the impacts. We agree the need for effective and robust monitoring and enforcement of environmental limits and/or envelopes, but we have significant concerns as to how the proposed framework will operate and how effective it will be. Much more information is needed on the proposed approach. Our concerns relate to:

- Any environmental framework to manage growth should not just be limited to the ANPS surface access targets, air quality, noise and carbon but should also monitor targets in relation to biodiversity and ecology to ensure that mitigation measures are delivered and are effective.
- The proposed Independent Scrutiny Panel (ISP) should have statutory powers to ensure limits are met. In the case of non-compliance with limits, the ISP has the potential to agree and propose mitigation, but it is unclear as to what powers it would have to bind Heathrow to take corrective action and implement mitigation, especially where impacts are off-site, or to prevent the airport's growth beyond a certain point until further mitigation can be found.
- Monitoring will be reviewing information to report against the limits 'after the fact' so it won't always be known if limits have been exceeded until some time after they have been breached. Therefore, it will be difficult to ensure that limits are adhered to and if the limits are shown to have been exceeded how the ISP will have the power to reduce the scale of airport operations.
- The community fund should not be used to mitigate for impacts which are as a direct result of expansion, either foreseen or unforeseen. The community fund should be used to improve the quality of life for local residents impacted by the expansion, above and beyond the mitigations required. There should be review mechanisms in the DCO to deal with mitigation for unforeseen impacts.

Additionally, we consider that it will not be possible to know whether the EMG approach can work in an acceptable way to ensure that environmental targets are on track before further growth is allowed until it has been operating for a number of years. The existing planning regime at the airport sets a cap on ATMs to control aircraft numbers and limit environmental impacts. In our view, the DCO should set interim/conditional caps on the total of ATMs allowed, potentially aligned with the ANPS surface access requirements, to provide more confidence and security for local communities.

The structure and governance for EMG needs to ensure accountability to local communities and there needs to be further engagement with this council and HSPG to develop this aspect.

As specified within the ANPS, the employment and skills measures proposed by HAL also need to be tracked through a monitoring framework.

Early Growth (Feedback question 8)

We do not consider there to be any national policy basis in either the ANPS or current government aviation policy for making more intensive use of Heathrow's existing two runways and increasing ATMs by 25,000 per annum.

Government policy in the ANPS only has effect in relation to the provision of a Northwest Runway at Heathrow and for new terminal capacity, although it would be a relevant consideration in determining

other applications for airport development particularly in London and the South East. In light of the Airports Commission recommendations on the more intensive use of existing infrastructure, government considered the needs case for making best use of existing runways across the whole of the UK and this is set out in its June 2018 policy statement. This is clear that government considers there is a needs case for making the best use of existing runways but beyond Heathrow. Para 1.25 states:

‘As a result of the consultation and further analysis to ensure future carbon emissions can be managed, government believes there is a case for airports making best use of their existing runways across the whole of the UK. The position is different for Heathrow Airport where the government’s policy on increasing capacity is set out in the proposed Airports NPS.’

Therefore, HAL should clearly demonstrate why these early growth proposals in the form of more intensive use of the current runways are needed to increase airport capacity in the UK and in the South East. There needs to be further engagement with local authorities on the detail of mitigation proposals.

Masterplan and Development Consent Order (Feedback questions 1 and 22)

As a general principle, all mitigation proposed in the Masterplan should be included in the DCO red line boundary.

We need further assurance on how the green and blue infrastructure elements of the Masterplan will be delivered given that much of the area identified for this purpose lies outside the DCO boundary. Separate third party agreements for each land parcel outside the DCO are currently proposed, but there is no guarantee that this land can be secured to deliver the Masterplan being promoted. The realisation of the Masterplan is crucial to ensuring the airport provides the benefits promised to local communities and a clear mechanism to guarantee delivery of the Masterplan needs to be provided.

In common with the other HSPG authorities, we feel that there has been a lack of consideration of B2 and B8 land uses displaced through the scheme. Logistics space will continue to be a key issue given the shortage of land available to accommodate what is needed in the Heathrow area and more consideration will have to be given to this issue if Heathrow is to achieve its economic potential. The dispersal of freight and cargo into a wider area will also create additional transport impacts outside the airport boundary. The potential to include more of these displaced uses within the Masterplan should be considered further.

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Communities, Environment and Highways Select Committee



19 September 2019

Forward Work Programme and Actions and Recommendations Tracker

1. The Select Committee is asked to review its draft forward work programme and actions and recommendations tracker which is attached.

Recommendation:

That the Select Committee reviews the attached forward work programme and recommendations tracker, making suggestions for additions or amendments as appropriate.

Next Steps:

The Select Committee will review its forward work programme and actions and recommendations tracker at each of its meetings.

Report contact: Huma Younis, Committee Manager

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Communities, Environment and Highways Select Committee

Forward Work Programme

2019

DATE OF MEETING	SCRUTINY ITEM	DESCRIPTION	OUTCOME	LEAD OFFICER/ RESPONSIBLE MEMBER
22 November 2019	Transformation Programme Update	Surrey County Council is undertaking a large scale transformation programme to address identified performance, financial and organisational culture issues to improve service delivery to residents and value for money. A number of full business cases approved by Cabinet aligned alongside six thematic areas will enable the organisation deliver the Vision 2030.	<p>For the Committee to scrutinise the delivery of the transformation business cases mapped alongside the Committees remit, including an update on KPI's relating to each business case.</p> <p>Full Business cases include:</p> <ul style="list-style-type: none"> • Waste • Fire Improvement • Asset and Place Strategy • Highways, Transport and Environment Transformation 	<p>Matt Furniss, Cabinet Member for Highways</p> <p>Denise Turner-Stewart, Cabinet Member for Community Safety, Fire & Resilience</p> <p>Mike Goodman, Cabinet Member for Environment & Waste</p>
	Directorate Priorities	For the Interim Director for Transport and Environment to brief the Select Committee on the strategic priorities/ focus for the directorate.	For the Select Committee to review the directorates strategic priorities for the year and consider how they can support the directorate from a scrutiny perspective.	Gillian Steward, Interim Director for Transport and Environment



Communities, Environment and Highways Select Committee Forward Work Programme 2019

	Budget Scrutiny	For the Select Committee to scrutinise the Councils budget proposals for 2020/21 in relation to services that fall within the committee's remit.	For the Select Committee to vigorously scrutinise the councils budget position to ensure sound financial management and a sustainable budget and make recommendations to the Resources and Performance Select Committee.	Mel Few, Cabinet Member for Finance Matt Furniss, Cabinet Member for Highways Denise Turner-Stewart, Cabinet Member for Community Safety, Fire & Resilience Mike Goodman, Cabinet Member for Environment & Waste Leigh Whitehouse, Executive Director of Resources Gillian Steward, Interim Director for Transport and Environment
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Communities, Environment and Highways Select Committee

Forward Work Programme

2019

Standing Items (to be considered at each formal Select Committee)

- **Update on Cabinet Member priorities-** For the Select Committee to receive an update on work that has been undertaken by Cabinet Members and areas of priority work/focus going forward.

Task Groups

- Fire Transformation Working Group (convened February 2019)
- Surrey's Greener Future Task Group (convened May 2019)

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**COMMUNITIES, ENVIRONMENT AND HIGHWAYS SELECT COMMITTEE
ACTIONS AND RECOMMENDATIONS TRACKER
2019**

The actions and recommendations tracker allows Committee Members to monitor responses, actions and outcomes against their recommendations or requests for further actions. The tracker is updated following each meeting. Once an action has been completed and reported to the committee, it will be removed from the tracker.

Date of meeting	Item	Recommendations/ Actions	Update/Response	Responsible Officer/Member
01 July 2019	UPDATE FROM THE WASTE TASK GROUP [Item 4]	The Communities, Environment and Highways Select Committee, I. welcome and endorse the waste task groups indication for keeping all CRC's in Surrey open, II. encourage extensive publicity and communication around recycling to residents by both officers and members, III. scrutinise the final waste task group report before submission to Cabinet, IV. recommend that the waste task group consider charging for waste disposal at CRC's as part of their work programme.	I. noted II. noted III. item has been added to the 19 September Select Committee agenda IV. noted by the task group.	Dr Andrew Povey, Chairman of the waste task group Alan Bowley, Interim Head of Environment

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01 July 2019	<p>RETHINKING TRANSPORT PROGRAMME</p> <p>[Item 5]</p>	<p>The Communities, Environment and Highways Select Committee,</p> <ol style="list-style-type: none"> I. support the Rethinking Transport project and will receive an update on the conclusion of the discovery phase in due course, II. agree for the Committee to receive briefings from the Deputy Leader on the progress of the Rethinking Transport project going forward. 	<ol style="list-style-type: none"> I. A discovery phase summary report setting out the work, key findings and next steps has been produced and is waiting for sign-off. Once this has been signed off this will be shared with the Committee, II. the Committee to receive an update on the progress of the project in September. 	<p>Colin Kemp, Deputy Leader</p> <p>Simon Griffin, Partnership Lead, Strategic Commissioning</p>
01 July 2019	<p>SURREY FIRE AND RESCUE SERVICE TRANSFORMATION WORKING GROUP PROGRESS REPORT</p> <p>[Item 6]</p>	<p>The Communities, Environment and Highways Select Committee acknowledges the progress of the Fire Transformation Working Group in undertaking its review and agrees for the Working Group to return to the Select Committee in September with final recommendations.</p>	<p>The task group's final report with recommendations will be considered by the Select Committee on 19 September 2019 and has been added to the forward work programme.</p>	<p>Saj Hussain, Vice Chairman</p>

**COMMUNITIES, ENVIRONMENT AND HIGHWAYS SELECT COMMITTEE
ACTIONS AND RECOMMENDATIONS TRACKER
2019**

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01 2019	July	FORWARD WORK PROGRAMME [Item 7]	For a clean, green and safe communities task and finish group to be set up.	A Surrey's Greener Future task group has now been set up. More details on the Task Group can be found at the following web page, https://mycouncil.surreycc.gov.uk/mg/CommitteeDetails.aspx?ID=802	Andy Macleod, Vice Chairman
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