



**NFCC**  
National Fire  
Chiefs Council

The professional voice of the  
UK Fire & Rescue Service

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13<sup>th</sup> April 2018

Dear Ewan

**Re: NFCC Response to the revised Draft of Forestry Commission Ops Note 40**

Firstly, can I extend my thanks for the 9th March meeting in Birmingham with yourself and Rob Gazzard where I had the opportunity to discuss in detail the issues of concern to National Fire Chiefs Council (NFCC) Wildfire Group in relation to the initial Ops Note 40 revision consultation document.

Can I also thank you for taking the time to consider those concerns and the subsequent re-drafting of the Ops Note to address the issues highlighted, particularly the change in emphasis from Fire and Rescue Services (FRS) having to "approve" or "agree" the wildfire risk assessments and mitigations put forward by the proposer to one where FRS "advice" is sought. As I have stated in previous correspondence and reiterated at the meeting, NFCC Wildfire Group welcomes the opportunities that the Forestry Commission Ops Note 40 provides for Fire and Rescue Services (FRS) to be made aware of landscape and vegetation changes which could adversely impact, and increase, the wildfire risk and threat within their areas. Closer co-operation with partners and sector stakeholders is a key component of the NFCC Wildfire Group strategy to better prepare FRSs to plan, respond and mitigate wildfire events - Ops Note 40 has a key role to play within that process.

I apologise that I have been unable to provide an edited track comment version of the revised Ops Note as yet. I will ensure that the necessary amendments are made onto the consultation copy as soon as possible and returned to you. In the interim, I have appended the suggested amendments below for your consideration. Where changes to existing text are being suggested they have been highlighted in red.

- **General comments;**
  - Change Chief Fire Officers Association (CFOA) to National Fire Chiefs Council (NFCC) where it appears within the document.
  - Main body of the Ops Note still references FRS being satisfied with mitigations. This differs from the provision of advice which is referenced in the later Annexes.

- It may be prudent to update the relevance of the statistics cited within the 'Background' section on **Page 1** as they only run to 2014/15.
- **Page 5** - *Where risks are identified, the project proposer should take the project proposal and the completed Wildfire Risk Assessment and seek the advice of the relevant Fire Authority, and use any advice that may be received from them to influence and inform their proposal in advance of a submission for a decision, permission or funding by the Forestry Commission.*
- **Page 7** - There remains an onus on FRS being 'satisfied' with the wildfire mitigations submitted as part of the application process. NFCC would request that the context is amended to change the emphasis to FRS having being consulted by the applicant on the mitigation plans and having the opportunity to comment on those plans as appropriate. Obviously if FRS are confident and comfortable in stating that they are satisfied with the proposals that is a position that could be adopted on a service specific basis.
- **Annex A:** Wildfire Management Plan - No additional comments
- **Annex B:** Wildfire Risk Assessment Template - No additional comments
- **Annex C:** Wildfire Risk and Hazard Checklist - NFCC Wildfire Group consider Annex C to be a comprehensive and valuable checklist and have no additional comments
- **Annex D:** Wildfire Risk Assessment Example - No additional comments
- **Annex E:** Stakeholders for wildfire planning - it is recommended that for clarity, there is acknowledgement appended to the final bullet point to make it clear that some Local Resilience Forum Community Risk Registers (CRR) may not hold information on wildfire risk and that CRRs are not presented in a uniform or consistent style
- **Annex F:** Contacting Fire and Rescue Authorities -
  - Suggest removal of the first paragraph regarding agreement between FCE / CFOA (NFCC) and FBU
  - Suggest removal of the footnote
  - Suggest removal of **Speaking to appropriate expertise in Fire and Rescue Services** paragraph, with the retention of the final sentence - *Where local services have identified that they do not have the relevant wildfire expertise to assist, further advice can be sought from the Chief Fire Officer Association wildfire group* - which is then added to the end of **Fire and Rescue Authority** paragraph.
  - Recommend that First Bullet under **What should the applicant include in the letter?** reads *That F&RS are being engaged on a project that is subject to Environmental Impact Assessment (Forestry) Regulation, and they will be asked to provide advice and comments on mitigation and control measures*
  - Recommend that Third Bullet under **What should the applicant include in the letter?** reads *That it is recommended that the enquiry be referred to the F&RS 'in-house' wildfire specialist for advice and guidance if one is available.*
- **Annex G:** Template letter to Fire and Rescue Authority -
  - Some FRS may not have wildfire specialists. The letter should reference liaison with the FRS rather than wildfire specialists.

- Suggest removal of the first paragraph regarding agreement between FCE / CFOA (NFCC) and FBU

I hope the comments above provide the clarity you need to be able to consider fully the response from NFCC Wildfire Group. Should you require any further detail or explanation please feel free to contact me at your earliest convenience.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Hedley', written in a cursive style.

Paul Hedley  
Chief Fire Officer Northumberland FRS  
and NFCC Wildfire Lead

- c.c. Rob Gazzard FCE Adviser, Technical Guidance, Contingency Planning  
CFO Chris Lowther, NFCC Technical Response Lead  
CFO Nathan Travis, NFCC Environment Lead  
Steve Adams, NFCC Chief of Staff  
GM Shaun Walton, NFCC Wildfire Group Chair