

1. Introduction

- 1.1 The National Fire Chiefs Council (NFCC) is pleased to respond to the Public Accounts Committee's Inquiry into *Government resilience: extreme weather* Inquiry to share our experience of how extreme weather events are affecting UK fire and rescue services (FRS) and the areas of improvement we have identified in order to build greater resilience.

2. Background

- 2.1 NFCC is an independent membership association comprised of a council of Chief Fire Officers and is the professional voice of the UK FRS. Our overarching aim is to lead, support and coordinate prevention, protection, resilience and emergency response across FRS so that they can meet changing demands and keep communities safe. NFCC has a unique role in representing FRS at a national level and leads on driving improvement and development throughout FRS, while supporting strong leadership – including for the devolved administrations.
- 2.2 The Chair of NFCC acts as the first point of contact for the Home Office, fire professionals, and partners such as the Local Government Association or the Association of Police and Crime Commissioners. NFCC represents fire and rescue in a range of Government and sector forums and the Chair is the first line of advice to ministers in England during major incidents.
- 2.3 The effects of climate change are becoming increasingly common. Over the past two decades, the UK has seen a vast increase in flooding, wildfires, heatwaves, landslides, sinkholes, high-intensity storms, and high winds. With extreme weather events increasing in number and severity, responding to them has, and is likely to continue to have, significant operational implications for FRS.
- 2.4 As a Category 1 Responder under the Civil Contingencies Act 2004, FRS play a key role in responding to extreme weather events as a consequence of climate change. Individual FRS are also statutory members of their Local Resilience Forum (LRF) and have long-standing relationships with local partners, planning, exercising, and responding to extreme weather events.
- 2.5 FRS are committed to serving the public during extreme weather emergencies, working alongside partner agencies. However, FRS face an array of funding pressures as a result of the evolving role of FRS in protecting our communities. In addition to the increasing number of extreme weather events, FRS face inflationary pressures, new risks arising from emerging technology, and existing

budgetary commitments. Without additional ongoing funding and the protection of existing FRS budgets in real terms, there is a risk that FRS will have to focus their resources on their statutory responsibilities and cannot guarantee that the level of service provided to communities for non-statutory duties will be maintainable long-term.

3. Summary

3.1 FRS are at the front line when it comes to responding to the impacts of climate change in the UK, particularly wildfires and flooding in most recent years.

3.2 To build greater resilience and to prepare for an increasing number of extreme weather incidents resulting from climate change, in our view, the following actions are needed:

- a) **Statutory duties** – There is currently a lack of alignment between statutory duties for flooding response and inland water safety between England and the devolved administrations. Statutory duties should be introduced for FRS to respond to flooding incidents which pose ‘a risk to life’ in England and inland water safety, including prevention activities.
- b) **Funding** – New burdens and continuous core funding will be needed to support new statutory duties, and dedicated funding should also be introduced to ensure FRS are able to train, equip and resource their staff to respond to extreme weather events and undertake prevention activity, so that public safety risks are minimised. Commitment is also needed from Government that costs for the replacement of New Dimensions national resilience assets at end of life do not become a burden on FRS and are funded centrally by the Home Office.
- c) **Data** – Government reporting mechanisms need to be improved to ensure consistency of data collection, including appropriate definitions for incident types. Appropriate and accurate reporting will facilitate resourcing to risk and effective forecasting. This will allow more efficient use of resources, providing better value for money and enhanced community safety.
- d) **Adaptation** – The need to equip FRS to meet net zero ambitions and respond to increasing numbers of extreme weather events requires long-term investment and adaptation measures. This is extremely challenging to achieve in the face of FRS budget cuts in real terms. Only if FRS are properly resourced and funded can innovation and capital investment be prioritised.

- e) **Government oversight and coordination** – FRS need Government to have a clear national vision on UK resilience with coordination between departments to enable a more integrated approach to climate adaptation through coordinated policy making. In addition, areas such as inland water safety need a lead Government department to provide monitoring and analyse where policy change may be beneficial.
- f) **Partnership working** – Resilience in the face of extreme weather events could be improved through a stronger interface between national Government, local authorities, and partner agencies. Greater collaboration could ensure that intelligence and risk information is shared, and facilitate more effective pre-planning and prevention work, thus providing Government with greater assurance that local plans are underpinned by a coordinated understanding of risk.

3.3 In the sections that follow, we have outlined how extreme weather events are impacting on UK FRS and provided some more detail on how the above improvement actions will help to develop resilience.

4. Flooding

- 4.1 Coastal, fluvial, and surface water flooding are identified as serious risks facing the UK on the 2023 National Risk Register.¹ The National Audit Office (NAO) report on Government resilience to extreme weather identifies that around 5.7 million properties are at risk of flooding in England in 2023 and that key infrastructure is at risk.²
- 4.2 Home Office data collected from the Incident Recording System (IRS) from 2016 onwards demonstrates the rising number of flooding or water related incidents attended to by FRS in England:³

¹ [National Risk Register 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115242/national-risk-register-2023.pdf)

² [Government resilience: extreme weather \(nao.org.uk\)](https://nao.org.uk/reports-and-publications/government-resilience-to-extreme-weather)

³ [Fire statistics data tables - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/fire-statistics-data-tables)

Year	Number of flooding/water related incidents attended to by FRS in England
2016/17	15,099
2017/18	16,695
2018/19	14,391
2019/20	17,543
2020/21	16,395
2021/22	17,388
2022/23	19,288

- 4.3 Whilst there is the public perception that FRS are responsible for responding to flooding incidents, there is no statutory duty placed on FRS in England to do so. However, statutory duties do exist in each of the devolved administrations. FRS in England experience significant funding challenges due to competing pressures and a need to fund other activities which are a statutory duty. As a result, FRS have a limited capability to fully invest in adequate training for staff and procuring access to specialist equipment.
- 4.4 In 2008, the Pitt Review⁴ into the 2007 floods which affected the UK made 92 recommendations and endeavoured to create greater clarity around response to flooding. Recommendation 39 stated that “The Government should urgently put in place a fully funded national capability for flood rescue with Fire and Rescue Authorities playing a leading role, underpinned as necessary by a statutory duty.”
- 4.5 In its response to the Pitt Review⁵, the Government stated its support for the recommendation, agreeing for the need for a properly funded national capability for flood rescue. This resulted in the Department for Environment, Food and Rural Affairs (DEFRA) working with the UK Search and Rescue Strategic Committee to implement a national flood rescue capability, which included the development of a flood rescue standard, team ‘typing’ multi agency operating procedures, common training and accreditation, and multi-agency command and coordination procedures. However, Government stopped short of introducing a statutory duty.
- 4.6 Implementing a statutory duty to respond to flooding incidents which pose a life risk would help to embed the position nationally and locally in terms of coordinating and preparing response, ensure consistency across the UK, and provide clarity for FRS and the public. In addition, a statutory duty also supports

⁴ [Pitt Review – Learning Lessons from the 2007 floods](#)

⁵ [Government response to the Pitt Review](#)

Fire and Rescue Authorities and Government departments' ability to plan for business continuity arrangements to prepare for potential periods of industrial action.

- 4.7 In Scotland, since 2005, FRS have had a duty to rescue people trapped, or likely to become trapped, by water, and to protect them from serious harm in the event of serious flooding.⁶ Similar provisions were introduced in Northern Ireland in 2012⁷ and Wales in 2017⁸
- 4.8 These provisions have enabled effective and coordinated planning to take place alongside investment in boats, training, and personal protective equipment. They have allowed FRS to review and ensure they have enough professionally trained firefighters available to tackle flood related emergencies and strengthen pre-planning and prevention related messages in conjunction with the LRFs, including post incident recovery work.
- 4.9 In contrast, the lack of a statutory footing to response to flooding where a life risk exists in England means that it is harder to make business cases for investing FRS time and resources into flooding response when duties with a statutory footing take precedence. Establishing a statutory duty would allow more preventative and pre-planning work, but would need to be supported by dedicated Government funding. Flood response requires a large amount of training and investment just to maintain basic response capacity and capability, so Government financial support is critical.
- 4.10 In 2010, funding was made available to FRS through the National Flood Enhancement Project, however, since the creation of the National Assets Register, no dedicated funding has been available for FRS in England to train staff, purchase equipment, or maintain or enhance flooding provisions. Furthermore, the National Asset Register for flood rescue capabilities has seen a reduction over the past 5 years in the number of boats, both powered and without engines, available for national deployment from FRS who had traditionally supported the register. Due to cuts and the tight financial envelope over the preceding years, FRS have needed to balance their limited resources and spend to prioritise capabilities which are required to fulfil a statutory duty.
- 4.11 Without a statutory duty and the underpinning financial investment, FRS in England may fall behind colleagues in the devolved administrations, resulting in a lower standard of safety in England in comparison.

⁶ The Fire (Additional Function) (Scotland) Order 2005.

⁷ The Fire and Rescue Services (Emergencies) Order (Northern Ireland) 2011.

⁸ The Fire and Rescue Services (Emergencies) (Wales) (Amendment) Order 2017.

5. Inland Water Safety

- 5.1 As with flooding, there is currently inconsistency across the UK in terms of FRS statutory duties for water safety and prevention work. Requirements for water safety prevention work by FRS were brought in alongside flooding duties referenced above, however, England continues to be an outlier in this area.
- 5.2 Currently, there is a lack of clarity within Government as to where responsibility for this policy area lies. No single department has accountability for drowning prevention, though many have an interest, and the Department for Transport has led on water safety at sea due to its accountability through the Maritime and Coastguard Agency. This lack of a specific accountable Government departments makes policy change and monitoring challenging, which is especially concerning considering that 2 in every 3 water deaths occurs inland.
- 5.3 Similarly to flood risk, water safety is factored into FRS Community Risk Management Plans (CRMP) and appropriate prevention activities undertaken. Some FRS also contribute to partnership working with the Royal Lifeboat Institution on a joint Community Water Risk project. Learning and guidance continues to be incorporated into National Operational Guidance in areas such as technical water rescue.
- 5.4 However, despite FRS best efforts, the number of drowning deaths in the UK remains high. In 2022, the total number of fatalities in water in the UK was 597 (212 of those being suspected suicides)⁹. This figure is much higher than deaths in fires, with 275 recorded in the year ending June 2022.¹⁰

6. Wildfires

- 6.1 Wildfires have become an increasingly common part of FRS response and prevention activities as the UK climate becomes more extreme. Wildfires are starting earlier in the season and typically lasting longer due to prolonged higher temperatures than the historic average.
- 6.2 In 2018¹¹, the Saddleworth Moor wildfire burned for over three weeks, with Greater Manchester FRS requiring mutual aid from other FRS and the military, with a hundred soldiers brought in to help tackle the blaze.

⁹ Annual reports and data – National Water Safety Forum

¹⁰ Fire and rescue incident statistics: England, year ending June 2022 – GOV.UK

¹¹ <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/UK-Wildfires-and-their-Climate-Challenges.pdf>

- 6.3 Shortly after, the Wanstead Flats wildfire in London involved more than 100 hectares, with smoke drifting across busy roads, causing local road closures. The fire required more than 225 firefighters and 40 fire engines and required 100 to remain for two days to dampen down the ground.
- 6.4 2022 will be remembered for the passing of two significant milestones: a daily maximum temperature of more than 40°C; and a national average temperature over the year of more than 10°C. The intense heatwave the UK experienced over the summer in 2022 resulted in a total of 983 wildfires being recorded in England and Wales. This was an increase from 247 wildfires in 2021 and 146 wildfires in 2020, an increase of 315% and 573% respectively.
- 6.5 Across 18 and 19 July, the hottest days of the year, 84 wildfires were recorded and 14 FRS declared a Major Incident, 9 of which were linked to difficulties in responding due to the increase in operational demand.¹²
- 6.6 With fire control rooms experiencing a 500% increase in 999 calls from a daily average in England of just over 2,000 to almost 13,500 on 19 July 2022, it was necessary for several FRS to implement 'Operation Willow Beck' to mitigate increased emergency call volumes.¹³
- 6.7 The impacts of climate change have driven a change in operational demand and risk which FRS need to be able to respond to. Whereas wildfires were previously limited to primarily rural areas of the UK within the service areas of certain FRS, we are increasingly finding that wildfires can now occur almost anywhere in the country and are impacting on all FRS, spanning multiple geographies and LRF boundaries. The nature of this creates challenges around capacity and resilience for FRS to be able to adequately resource and respond in a timely manner.
- 6.8 Part of this change has been driven by the increasing number of wildfires crossing into the 'Rural Urban Interface' (areas where vegetation meets the built environment). Such instances were particularly prominent in 2022, resulting in significant property damage, evacuation of communities, and injuries. The Wennington wildfire that took place on 19 July 2022 resulted in many residents needing to be evacuated and destroyed 16 homes.

¹² [Summer wildfires increased fourfold in England in 2022 | Wildfires | The Guardian](#)

¹³ "Operation Willow Beck" is a process designed in collaboration between the Home Office, the NFCC Mobilising Officers Group, the NFCC Fire Control Room Project and British Telecom to mitigate increased emergency call volumes.

- 6.9 There are currently several significant challenges that FRS face when undertaking activities related to wildfires, covering aspects of preparation, response, and prevention. These include:
- Being able to maintain their 'business as usual' service whilst managing the significant resource and staffing pressures wildfires create.
 - Ability to deliver bespoke wildfire training and fund the associated costs as wildfires become more common incident types for all FRS.
 - Lack of suitable personal protective equipment (PPE).
 - Varying levels of public awareness and understanding of wildfire risks.
- 6.10 Responding to wildfire incidents is not a specifically funded capability and falls into the general FRS duty to extinguish fires. As such, cost associated with the development of capabilities and capacity to fight wildfires must be drawn from FRS core budgets. With wildfire incidents likely to increase, consideration needs to be given to dedicated funding for a national capability to ensure safe wildfire incident management, including tactical and strategic training, PPE, and specialist equipment.
- 6.11 One of the challenges faced by FRS is the lack of consistent and quality data collected at a national level. Whilst the IRS data which informs Home Office reporting provides national statistics, wildfires are not accurately captured with other outdoor fires obscuring the figures. This is compounded by differing definitions across organisations. More accurate reporting would enable better forecasting of emerging risks and the predicted scale and impact of wildfires on communities. This information could be used by FRS to inform service resilience and the development of wildfire risk assessments by individual FRS.
- 6.12 In addition to wildfire risk assessments, which are owned by individual FRS, it is necessary for local areas to develop wildfire prevention and mitigation strategies. This requires partnership working with local agencies, landowners and the community as a whole. More could be done to encourage this kind of partnership working, and this work would also benefit from greater Government engagement and oversight. Wildfires cross over the remit of the Home Office, Cabinet Office, and Department for Environment, Food and Rural Affairs (DEFRA). Greater collaboration would support strategic decision-making on the prevention and management of wildfire risks across the UK. Furthermore, a stronger interface between Government and local areas to share intelligence about wildfire risks and learning from operational response would help to inform any national policy and guidance, and ensure that it is aligned to operational best practice.

- 6.13 This joined-up work could then be used to raise public awareness and improve education on wildfire risks and how to avoid them. These messages are central to prevention and mitigation strategies, and wildfire prevention and education campaigns developed and delivered at a national level would support local initiatives aimed at reducing wildfire risks.
- 6.14 There will need to be dedicated Government funding for the review of New Dimensions assets. New Dimensions assets, which comprise national resilience and specialist equipment used for activities such as decontamination and urban search and rescue, are now coming to the end of their life and require replacement at an estimated cost of £100m. NFCC are working with the Home Office to see where efficiencies can be made that may be able to reduce these costs, however, we are clear that financial responsibility for New Dimensions national resilience capability sits with the Home Office and should not become a burden on FRS.

7. Accurate Data and Definitions

- 7.1 The Incident Reporting System (IRS) is a national data collection system managed by the Home Office which is used by FRS to report information on the incidents FRS have attended. This is a useful tool which could be used to identify trends and inform FRS activities; however, IRS is not currently set up to accurately report the kinds of incidents that FRS attend, particularly in relation to extreme weather events.
- 7.2 Currently, there is no single definition of what constitutes a wildfire and categorisation varies across different agencies, resulting in inaccurate reporting and analysis. Minor outdoor fires are often mis-categorised as wildfires, thus distorting statistics. Lack of alignment with the Forestry Commission in particular is unhelpful.
- 7.3 Changes should also be made to the way that water deaths are recorded to ensure that incidents can be more clearly understood and categorised. The number of incidents does not always correlate to the number of injuries or fatalities, and accurate data is essential in ensuring that resources can be properly targeted and aligned to risk profiles.
- 7.4 To build resilience at national and local levels, it will be crucial to have accurate data capture mechanisms in place that enable forecasting and detailed risk and impact analysis for extreme weather events. This would enable more effective and efficient deployment of assets across a partnership landscape to deal with these events.

7.5 Accurate data and forecasting models would also help to drive mitigation and prevention strategies with partners and communities in local areas and ensure prompt communication of any public safety alerts.

8. Adaptation

8.1 We are concerned that current pace and scale of adaptation is too slow to fully prepare the UK for climate change risks. We agree with the NAO report finding that the UK Government Resilience Framework could be improved with a well-defined vision for what a resilient UK looks like, including targets and standards for the desired level of national, local or sectoral resilience.

8.2 It is important to make the distinction between being operationally prepared to respond to extreme weather events, and the longer-term strategies needed to adapt to and mitigate the longer-term trends that climate change will bring when the extraordinary becomes ordinary.

8.3 Currently, under the Fire and Rescue National Framework for England¹⁴, FRS are required to develop Community Risk Management Plans (CRMP) which are typically short to medium term 4-year plans that identify how community risks will be prevented and responded to. FRS also input to the development of LRF emergency plans. Whilst CRMP and LRF emergency plans are necessary operational risk management and planning tools, longer-term adaptation and mitigation strategies at national and local levels will be required to fully prepare the UK for climate risks.

8.4 FRS are committed to working with partners in their local areas to develop adaptation and mitigation strategies, however for many FRS, investing into change to adapt to and mitigate the effects of climate change is costly. Whilst many FRS are doing what they can to work in more sustainable ways, funding limitations often hinder the ability of FRS to invest in renewable energy sources for electricity, heating and fleet.

8.5 Changes to vehicles, buildings, and operating procedures all require investment, but this is difficult to justify in the face of real-terms funding cuts and the need to resource statutory responsibilities. Capital investments, in particular, are hard to implement and green alternatives are more expensive. Alternatives to diesel vehicles pose a particular challenge, and installing charging infrastructure will be costly, and comes with its own increased fire risk into FRS estates which must be appropriately managed.

¹⁴ [Fire and rescue national framework for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/fire-and-rescue-national-framework-for-england-2019.pdf)

9. Conclusion

- 9.1 Building resilience to extreme weather events will be critical as we expect to see incidents increase in number and severity. NFCC remains committed to keeping communities safe and taking an active role with national and local partners to develop resilience strategies.
- 9.2 We would be keen to support this Inquiry and to provide any additional information that would assist the Committee.