
From: RMP Department
Sent: 02 December 2016 11:08
To: [REDACTED]
Subject: RE: Consultation

Dear [REDACTED],

Thank you for your response relating to the IRMP 2017-22. Your comments are important to us and will be considered prior to the final consultation report that will be issued to the Combined Fire Authority in January 2017.

Please be assured that I will keep you informed of the outcome of the consultation and any subsequent decisions taken.

Kind Regards

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 29 November 2016 15:12
To: RMP Department
Subject: Consultation

Hi

I have had a read of the IRMP document and thought it is really good. I just have one little suggestion on page 20. Could the final paragraph (starting....To ensure constant improvement) be moved to the beginning of this page as this is more about setting the scene and providing the background? When I read it in its current position I assumed it related just to the Road Safety section as it follow on. It may also need to say – the Service has dedicated 4 thematic groups?

Many thanks

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

From: RMP Department
Sent: 14 December 2016 08:48
To: [REDACTED]
Subject: RE: Lancashire Fire and Rescue Service - IRMP Consultation

Hi [REDACTED],

Yes that's correct the Emergency Cover Review proposals which have previously featured in the IRMP are due April 2018, so any future proposed changes will be presented for consultation separately.

Kind regards

Joy

From: [REDACTED]
Sent: 13 December 2016 14:37
To: RMP Department
Subject: Re: Lancashire Fire and Rescue Service - IRMP Consultation

Hi Joy I have had a look at the Plan. In previous years there was a section on expenditure reductions, but nothing jumped out at me. Does this mean there are none proposed.

Kind Regards,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

On Friday, 2 December 2016, 10:59, RMP Department <rmp@lancsfireandrescue.org.uk> wrote:

Dear [REDACTED]

Thank you for your reply. As consultation closes on the 8th January 2017, for any comments to be considered they would need to be received by this date. Consultation periods are agreed by the Combined Fire Authority in advance and the closing date of this consultation period is set to meet subsequent Authority meetings.

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 01 December 2016 19:55
To: RMP Department
Subject: Re: Lancashire Fire and Rescue Service - IRMP Consultation

Hi and thanks for your email. Unfortunately the Agenda for the Dec meeting has now been issued and the next PC meeting is not until the first meeting in Feb, so we will not be able to submit comments until after that date.

Kind Regards,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: RMP Department
Sent: 02 December 2016 11:10
To: [REDACTED]
Subject: RE: IRMP- Station Icon

Dear [REDACTED],

Thank you for your response relating to the IRMP 2017-22. Your comments are important to us and will be considered prior to the final consultation report that will be issued to the Combined Fire Authority in January 2017.

Please be assured that I will keep you informed of the outcome of the consultation and any subsequent decisions taken.

Kind Regards

Joy Hetherington
Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 01 December 2016 12:02
To: RMP Department
Subject: IRMP- Station Icon

Hi,

On the map of LFRS stations and duty systems (page 3) Chorley has both the DCP / Retained icon and a Retained icon (possibly from when the RDS hadn't moved from the old station?) this should only have the DCP/ Retained icon now.

Regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: RMP Department
Sent: 05 December 2016 10:21
To: [REDACTED]
Subject: RE: DRAFT INTEGRATED RISK MANAGEMENT PLAN 2017- 2022 - CONSULTATION

Dear [REDACTED],

Thank you for your reply. As consultation closes on the 8th January 2017, for any comments to be considered they would need to be received by this date. Consultation periods are agreed by the Combined Fire Authority in advance and the closing date of this consultation period is set to meet subsequent Authority meetings.

We appreciate that this response may be disappointing in respect of your comments below, however we are unable to accommodate any changes to our consultation process at this time. We do hope that as a stakeholder you may find an alternative way to participate in our consultation process as your comments are valued.

Kind regards

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 05 December 2016 08:53
To: RMP Department
Subject: DRAFT INTEGRATED RISK MANAGEMENT PLAN 2017- 2022 - CONSULTATION

Good morning

I am writing on behalf of Wyre Council's Overview and Scrutiny Committee who would like the opportunity to consider submitting a response to the consultation. They meet this evening but have only just become aware of the consultation so it is not on their agenda. The next meeting of the Committee is not until Monday 9 January, after your deadline. Consequently, the Committee has two questions:

- 1 Is it likely that the deadline might be extended if other organisations also find the time constraints problematic, particularly over the Christmas and New Year holiday periods?
- 2 Would any submissions received after 8 January 2017 still be considered?

The Committee notes your comment, "*We believe it is essential that stakeholders are given the opportunity to consider this plan and to express an opinion on the content*" so we hope that you might be able to accommodate a response under 1 or 2 above.

Thank you and we look forward to hearing from you.

[REDACTED]

[REDACTED]
[REDACTED]
Wyre Council

[REDACTED]
[REDACTED]
[REDACTED]



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Payments - wyre.gov.uk/pay

From: RMP Department
Sent: 07 December 2016 08:35
To: [REDACTED]
Subject: RE: Lancashire Fire and Rescue Service - IRMP Consultation

Dear [REDACTED]

Certainly, I will send you a copy out today

Kind regards

Joy

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 06 December 2016 16:38
To: RMP Department
Subject: RE: Lancashire Fire and Rescue Service - IRMP Consultation

Good afternoon,

Would it be possible to get a hard copy of this report. It would be appreciated.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Scrutiny Committee
Boundary Committee

Please visit--->

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www.facebook.com/PenworthamFoodBank

From: RMP Department
Sent: 12 December 2016 14:24
To: [REDACTED]
Subject: RE: Lancashire Fire and Rescue Service - IRMP Consultation

Dear [REDACTED]

Thank you for your response, the consultation period was agreed in advance by the Combined Fire Authority and is in line with our Consultation Strategy 2016/17 which states

Public consultation timeframes will vary in proportion to the scale of the issue/proposals, with a minimum of four weeks and a maximum of twelve-weeks.

I acknowledge your comments with regard to not seeking an extension due to the documents content, however if you wish to discuss the consultation timescales any further please contact Area Manager Phil Cox who will be happy to speak with you.

If you would like any further detail on the strategy it can be found on our website
<http://www.lancsfireandrescue.org.uk/Pages/publications.aspx>

Please be assured that for any future consultations the consultation period will be carefully considered dependant on the content of the proposals.

Kind regards

Joy

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 12 December 2016 10:50
To: RMP Department
Subject: RE: Lancashire Fire and Rescue Service - IRMP Consultation

TO RMP team.

Thanks for inviting the FBU to make a response to the Draft IRMP 2017-2022. We will forward our response in due course, however we would at this point like to take the opportunity express our disappointment at a six week consultation period that runs through the two week Christmas and New year break. It is common practice and indeed Government guidance (IRMP Guidance Note 2) for a 12 week consultation period to be given that allows for considered written responses. I have copied the relevant text below.

4.5 Sufficient time should be allowed for considered responses from all groups with an interest. Cabinet Office guidelines (www.cabinet-office.gov.uk/servicefirst/index/consultation.htm) provide useful information on best practice in conducting consultation exercises. This includes the Code of Practice on consultation documents issued by government which suggests that, other than in exceptional

circumstances, a minimum period of twelve weeks should be allowed for written consultation. It is recommended that you adopt a similar timescale for consultation on the draft Integrated Risk Management Plan because of its potential scope and complexities.

I am not seeking an extension on this occasion as it would be unreasonable at this late stage and thankfully the document isn't too complex. I do however trust that LFRS will take this Government guidance into consideration for future consultations.

Regards

[Redacted signature]

From: RMP Department
Sent: 16 December 2016 13:22
To: [REDACTED]
Subject: RE: Integrated Risk Management Plan 2017-22 Feedback

Hi [REDACTED]

Thank you for your comments, I will ensure that they feature in the final report that goes to Planning Committee following the consultation. If I have any questions when making the amendments I will contact you but it all seems fairly straightforward.

All the best

Joy

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 14 December 2016 12:12
To: RMP Department
Subject: Integrated Risk Management Plan 2017-22 Feedback

Hi

As LFRS hold the ISO 14001 standard it is necessary to make a clear link to the strategic plans and objectives in relation to Climate Change and Environment. This is currently achieved through the Climate Change and Environment Strategy which was agreed by the CFA way back in 2009. This strategy contained a number of improvement actions which have all now been integrated into day-to-day operations. To ensure Climate Change and Environmental considerations (both internal and within the wider community of Lancashire) are considered at the strategic level it is necessary to show within the highest level plans and objectives of the service (IRMP) how this is planned for and considered.

I request that minor changes are made to the IRMP to strengthen the link to the reason that the service is having to adapt to deliver its service; examples being flooding and wildfire is because of the changing climate. We are having to adapt to climate change and consider the environment, especially in the operational environment but also in making the communities resilient through prevention and protection alongside partners (Local Resilience Forum). There is a balance to be struck when responding to different types of incidents due to the changing climate and the safety of firefighters and needs to be enhanced in the planning so should be in the highest level planning document (IRMP) and will also provide clarity against the ISO 14001 standard.

I accept on P13 environment through the PESTLE is considered but the words 'Climate Change' and if possible how 'LFRS adapt and mitigate the effects of the changing climate' would really help against evidencing that Climate Change and the Environment are inclusive within LFRS and considered at the highest level. (I believe they are we just need to be clear on how the outcomes link to the plan/objectives).

In respect of the existing Climate Change and Environment Strategy I request that this strategy is made obsolete when the IRMP is implemented as the Climate Change and Environment considerations are included in the IRMP (assuming the above comments are accepted and changes

made to the draft IRMP) and also within the associated Strategic Assessment of Risk document. As part of the reporting of the new IRMP to CFA can this point be noted to ensure closure and completeness of the Climate Change and Environment Strategy as all actions have been completed and is now integrated into business as usual. At this point the climate Change and Environment Strategy should be removed from the Internet (CFA website) and internally (SHE department).

Other points of note:

Include a reference to the Safety, Health and Environment Annual Review reported to CFA annually which demonstrates and reports our performance for both Health and Safety and the Environment.

P4 - amend the box Health and Safety to read Safety, Health and Environment. (Environment is the same level of risk as Health and Safety).

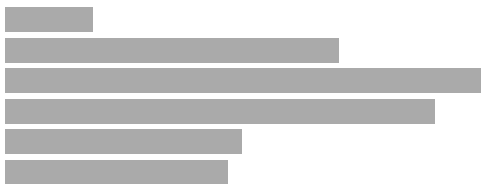
P6 - 2.0 to read 2.


P10 - Strategic Assessment of Risk – I read this just in relation to fire which is our primary reason but all other risks; RTC, flooding, wildfire, rescues should be/are considered as part of the assessment which in turn is delivered through strategic actions. For example, rope rescue teams, SRT pumps, special appliances, new PPE etc. Not sure the IRMP clearly defines what this document is used for and how it results in changes in LFRS/Community.

P15 - under people planning, first bullet point to read 2017-2019 not 2016 as that date is in the past once implemented.

P18 - in the title other emergencies, expand to include RTC's, flooding, wildfire, search and rescue activities so the public understand the full range of activities we respond to and deliver.

P22 – include an additional ambition – minimise the impact to the environment.



 [Lancashire Fire and Rescue Service](#)

 [@LancashireFRS](#)

 www.lancsfirerescue.org.uk

From: RMP Department
Sent: 15 December 2016 15:16
To: [REDACTED]
Subject: RE: Feedback

Hi [REDACTED],

Thank you for your feedback, it's much appreciated and has been passed on to Corporate Comms to amend the spelling error

Kind regards

Joy

Joy Hetherington

Strategic Planning Officer
Lancashire Fire and Rescue Service

From: [REDACTED]
Sent: 15 December 2016 14:46
To: RMP Department
Subject: Feedback

Good afternoon

Just a small observation whilst the IRMP is still in its draft stage, - I have noticed a spelling mistake at the last point on page 23 where it states; "**Trade Unons**".

I just thought I'd highlight this to save any potential embarrassment before the final version is promulgated.

I previously reported this on the 29.11.16 but just wanted to ensure that I follow the correct reporting procedure.

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Lancashire Fire and Rescue Service

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From: SHQ - Ormerod, Alison
Sent: 21 December 2016 09:29
To: [REDACTED]
Cc: SHQ - Hetherington, Joy
Subject: RE: Draft IRMP

Hi [REDACTED],

Thank you for your comments. We will endeavour to include the changes as suggested once consultation is complete in January.

If we need any clarification we will get back to you.

Kindest Regards,
Alison

From: [REDACTED]
Sent: 19 December 2016 12:15
To: RMP Department
Subject: Draft IRMP

Hi – I've reviewed the draft IRMP and it's a great document – a little wordy but I appreciate that's required.

I think the document provides a great summary and overview of the organisation and has a very positive 'vibe' to it – very much a can do - will do feel. I especially like that our Priorities and Values are very clear but still linked – particularly important for staff to appreciate this.

I did note:

Page 6 Local Change – is it worth clarifying 'Combined Authority'? As we mention previously in the document that LFRS is a Combined Fire Authority I'm wondering if this might just be a little confusing for someone outside of the organisation.

Page 6 NFCC – is it worth stating that this 'newly formed body' replaces a previous one (we can be criticised for too many groups/bodies etc so this might emphasise the will to be flexible and change when required)?

Page 14 – I'm presuming the actual Annual statement 2016-16 will be the one included in the final IRMP (I'm aware the consultation went out prior to signing off of this year's statement).

Page 23 – Trade Unions – spelling mistake (*Unons*).

Page 25 – I'm struggling to get the link for the annual performance Report to work on the electronic copy.

[REDACTED]

From: RMP Department
Sent: 10 January 2017 13:59
To: [REDACTED]
Subject: RE: Response to Lancashire Fire & Rescue IRMP Consultation by TRW Parish Council

Dear [REDACTED]

Thank you for your comments in response to our IRMP consultation. Your comments are important to us and will be put forward for further consideration, you will receive a more detailed response in due course.

Regards

Joy Hetherington
Strategic Planning Officer
Lancashire Fire & Rescue Service

From: [REDACTED]
Sent: 08 January 2017 22:21
To: RMP Department
Cc: [REDACTED]
Subject: Response to Lancashire Fire & Rescue IRMP Consultation by TRW Parish Council

Dear Risk Management Team,

1. Treales, Roseacre & Wharles Parish Council (TRW PC) wishes to thank the Lancashire Fire & Rescue Service (LFRS) for the opportunity to review the draft LFRS Integrated Risk Management Plan (IRMP).
2. We observe that the plan offers a structured approach to risk management, which is to be commended. We also observe is not yet complete, as it does not reflect any assessment and mitigation of the hazards from shale gas developments that have progressed and indeed materialised both across the County and specifically around our community. This is of grave concern.
3. We note that neither the draft IRMP, nor the Community Risk Register (CRR) make any reference to shale gas extraction by fracking. The 2016 LFRS Strategic Assessment of Risk (SAR) acknowledges the emergence of fracking, with reference to three applications by the small SME Cuadrilla.
4. As a result of the issuing in 2015 of the government policy on Shale Gas and the 14th round of awards of Petroleum Exploration and Development Licences (PEDL) across Lancashire (and many other parts of England), the prospect of fracking is now a structural matter for Lancashire. The assessment of the implications of this are not apparent across the suite of LFRS and LRC risk related documents. There is, therefore, no apparent assessment of the increased instances of hazards, nor the requirement for different profiles of LFRS resource.

5. Note that it is a requirement of retaining a PEDL that development has to be undertaken by the licensee within a given time period, therefore any baseline plan should assume fracking activity will take place right across Lancashire during the draft IRMP period.
6. Additional instances of Emergency Hazards arising from the introduction of fracking related activity in Lancashire include :
 - Hydrocarbon and explosives sourced fire hazards;
 - Airborne chemical releases such as fugitive Methane, Benzene, H2S, Radon, and PM2.5 particulate hazards;
 - Fire fighting media pollution risk;
 - Short and long term ground water pollution hazards from: spillages; and leakages within geology from what are required to be permanent fracking flowback fluid waste repositories;
 - Road traffic incidents due to large increases in numbers of OGV2 truck and tanker movements, particularly in narrow rural lanes;
 - Adverse impact on the response times of LFRS to other emergencies due to fracking related increased OGV2 traffic levels causing delays on narrow rural lanes;
 - Polluting spillages from vehicles (notably fracking flowback fluid containing unspecified mobilised chemicals within the geological strata);
 - Infrastructure damage arising from induced seismicity.
7. The government has initiated a number of safety reviews of shale gas since 2012. These have generated 82 recommendations required to address identified related safety risks. They have yet to be evidenced as having been satisfactorily complete by the commissioners of the reviews.
8. The industry and government energy department both advocate that fracking surface works have been demonstrated in the UK to be located a horizontal distance of 11km from the target geology. This enables environmental issues arising from the locations of surface works to be avoided. Lancashire and its associated districts have made considerable effort within their Local Plans to provision and approve areas supporting Heavy Industrial Processes, such as fracking. Their use would mitigate many of the safety and sustainability hazards associated with the current applications for fracking sites in Lancashire (please contact us if further references are required). This has not been done. This increases community & environmental safety risks, plus increased assessment, monitoring & control requirements upon the safety regulatory bodies, such as LFRS. Without such adoption, Lancashire will be exposed to greater risks and LFRS greater costs, essentially paying for the profits of developers.
9. It is, therefore, not clear how the LFRS will be able to address these additional hazards in association with the budget cutback initiated by the Secretary of

State for Communities & Local Government (SSCLG) as noted in the draft IRMP

10. There does not appear to have been any visible input to date from LFRS in respect of the assessment & response to risks arising from Lancashire fracking proposals and applications. There is extensive experience in the USA and Australia of the risks arising and responses, but there is no visibility that that has been utilised.
11. We are very concerned that the proposed location of fracking surface works in rural residential areas, will prompt new major fire, explosion and road safety issues directly from the activity. We are concerned that the distribution of resources of the authority are not yet sufficient to deal with these risks. We are also concerned that the increased presence of OGV2s in narrow rural lanes would impede the response of the emergency services to issues arising within our community arising from existing risks.
12. We have not seen how the Fire & Rescue Authority has deployed resources to address the new risks with the required responses and clearly we would wish that to be so, lest there be unaddressed risks to our community and environment.
13. There does not appear to have been any input into managing and mitigating risks in the Cuadrilla Preston New Road (PNR) and Roseacre Wood (RW) site applications. These have resulted in surface works being proposed and located in rural residential areas rather than locations already approved in the Local Plan and provisioned to support heavy industrial processes with their associated safety case infrastructure. Both the government and industry advocate that this is unnecessary.
14. It is noted that the map on page 11 of the draft IRMP shows that our Parish is designated as being a low risk area. Does this affect the emergency response vehicle response time?
15. Will this low risk status and potential increased hazard risk management resourcing cost be reviewed for the initiated and prospective developments at Little Plumpton and Roseacre/Wharles. We note that this would be unnecessary if the fracking surface works were located in areas already provisioned and approved for such Heavy Industrial Processes rather than these unapproved and ill-provisioned residential rural locations.
16. The draft IRMP and associated documentation is not up to date in respect of the recognition that the SSCLG has approved the PNR development and is minded to approve the RW site. This is in spite of the rural traffic safety and adjacency to residential communities. It is, therefore, not clear how these sites are to be classified under which governance framework e.g. subject to COMAH.
17. The draft IRMP and associated documentation does not yet recognise that development has actually occurred at PNR on 5th January 2017. There is, therefore, no acknowledgement of the safety infrastructure provision that should be established within the IRMP. We would have anticipated that there

should have been a reference in the documentation detailing what regulatory approach was to be adopted in advance of any development being initiated, including such as IP19 or its equivalents. This is not evident and is of considerable concern.

18. It is noted that there is a declared intent on page 21 of the draft IRMP to "reduce the regulatory burden for local businesses". This doesn't sound appropriate if we are to consider Cuadrilla as a local, small, inexperienced SME business with a perceived poor performance track-record. Their regulatory "burden" should be of the highest required standard to ensure the complete protection of the exposed community, other organisations and the environment, until they can prove their process merits a reduced level of governance.
19. The above omissions reduce confidence in the competence of the service, however unintended.

For the reasons above we conclude that the IRMP is not yet complete and we would ask that the LFRS IRMP be modified to address the hazard risks arising from & responses to government policy to shale gas exploration by fracking. This is to be in accord with how it is likely to adversely affect our Lancashire communities, organisations and environments.

We would be pleased to work with you to address these new risks to be captured in the IRMP and the other ongoing fire & rescue related issues of our rural community.

Thank you for your ongoing service and the opportunity to provide feedback on your draft IRMP. It is a structured approach which is to be commended. We would ask that the points above be taken account of prior to the final IRMP being issued.

yours sincerely,

████████████████████

████████

Treales, Roseacre & Wharles Parish Council

From: RMP Department
Sent: 12 January 2017 15:10
To: [REDACTED]
Subject: RE: Response to Lancashire Fire & Rescue IRMP Consultation by TRW Parish Council

Dear [REDACTED],

Thank you for your email, please be assured that the comments sent in from Treales, Roseacre & Wharles Parish Councillor Gillian Cookson will be considered and a response will be provided in due course.

Kind regards

Joy Hetherington
Strategic Planning Officer
Lancashire Fire & Rescue Service

From: [REDACTED]
Sent: 10 January 2017 17:07
To: RMP Department
Subject: Fw: Response to Lancashire Fire & Rescue IRMP Consultation by TRW Parish Council

As a [REDACTED] I would be obliged if the comments from the Parish Council could be taken on board and incorporated in the TRW to make sure that the strategic impacts of fracking on Lancashire are fully covered in the document.

I look forward to receiving your response.

Regards, [REDACTED]