



**Hampshire
& Isle of Wight**
FIRE & RESCUE SERVICE

Information Compliance Team
Headquarters
Leigh Road
Eastleigh
Hampshire
SO50 9SJ

Sent by email to:



t. 02380 626850
e. DP@hantsfire.gov.uk
w. hantsfire.gov.uk

Date: 21 June 2023

Our Reference: EIR 016 23-24

Enquiries to: Information Compliance Officer

Environmental Information Regulations 2004

Dear 

We are writing in respect of your application for the release of information held by the Service, which we received on 3 May 2023. We can confirm that we have now completed our search for the information requested.

You asked:

"I request all pertinent information to what your your organisation has achieved pertinent to wildfire preparedness as a result of this Home Office 2019 document below asking of Category 1 responders. This more specifically is for when seeking to address wildfires causing danger to people in their homes and the danger to their homes.

<https://ddec1-0-en-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2ffireengland.uk%2fsites%2fdefault%2ffiles%2f2021%2d12%2f211220%2520Wildfire%2520Framework%2520for%2520England.pdf&umid=0c9c99e0-51a1-41c9-bcfc-3fac286f740e&auth=62581598452b13423483c832308de1fc9e3b812d-337bb5716cb95f70fc9646c2a1957f30741a7957>"

Our answer:

We can confirm that we hold the information requested. As a Category 1 responder, Hampshire and Isle of Wight Fire and Rescue Service (HIWFRS) is a member of the

Hampshire & Isle of Wight Local Resilience Forum (LRF), a multi-agency partnership which has the aim to plan and prepare for localised incidents and catastrophic emergencies.

The National Security Risk Assessment, which is used to compare, assess and prioritise risks to national security, rates wildfire as a medium risk, and locally the LRF have rated it as High. HIWFRS lead on the Wildfire risk and annually present to partners to ensure shared understanding of risk and available resource for response. Wildfire is identified as a risk to share with communities when undertaking prevention and preparedness work with communities through the Community Resilience workstream.

All but very high risks are covered by generic plans concerning all aspects associated with the risk such as:

- Emergency Response Arrangements - command and control (“EIR 016 HIOW-TV LRF Emergency Response Arrangements v5.01 July 2022_Redacted” enclosed)
- Emergency Warning and Informing Plan - public reassurance and guidance. (“EIR 016 HIOWLRF Emergency Warning and Informing Plan 2022 v7” enclosed)
- Scientific and Technical Advice Cell (STAC) - air quality, advice to public and potentially where we would place a Wildfire Tactical Advisor (contained within “EIR 016 HIOWLRF Community Recovery Plan Version 7.0 2022_Redacted” enclosed)
- Community Recovery Plan - post incident welfare and support (contained within “EIR 016 HIOWLRF Community Recovery Plan Version 7.0 2022_Redacted” enclosed)

Please be aware that although these arrangements exist and can be activated for wildfires, these arrangements have never used in relation to wildfires as no wildfire has reached the level where additional support from outside the Service has been necessary at this scale.

In addition to this HIWFRS also:

- Liaise with local landowners such as Ministry of Defence, Forestry England and National Trust to familiarise ourselves with wildfire risk areas. As a result of this work, we hold copies of Fire Maps for both Ministry of Defence (MOD) sites and the New Forest National Park. (Please see enclosed maps from the MOD with named locations and the Forestry England Map entitled “EIR 016 New Forest Fire Emergency Overview Maps” enclosed)
- Have a Memorandum of Understanding with Forestry England to conduct joint patrols at wildfire Hot Spots in the New Forest. (“EIR 016 Final version HIWFRS Forestry England MOU_ (003)_Redacted” enclosed)
- Use social media to share NFCC wildfire prevention messaging. These messages reached 240,000 people via our social media channels in summer 2022.

HIWFRS have a cadre of trained Wildfire Tactical Advisors to support the response to this incident type. These advisors work locally, regionally and nationally to share experience and learning. HIWFRS also have the ability to call on National Wildfire Tactical Advisors to support incidents.

It is deemed that these activities provide appropriate guidance to responders under the needs of the Civil Contingencies Act.

Please be aware that we have redacted the personal data from the enclosed documents as it would be unfair, within the meaning of the UK GDPR, for us to provide this information in response to your request as per Regulation 12(3) of the Environmental Information Regulations 2004. This exception is not subject to a public interest test. Please rest assured that we have only redacted the minimal amount of information necessary to protect the rights of individuals.

New Forest Map

In addition to the enclosed maps, we also hold a detailed map identifying risk levels of fires in the New Forest. However, we are refusing to provide this as the map also contains information about the locations of overhead and underground powerlines and gas pipelines.

While we are not questioning the motives of the applicant, the release of this information would enable criminals and terrorists to target key national infrastructure for the purposes of endangering lives. As national infrastructure is a key target for terrorists the release of this information would be contrary to the protection of national security. Further the information can be used to plan terrorist attacks that would cause higher levels of casualties, endangering the public.

In addition, revealing the fire risk levels would enable the identification of areas vulnerable to targeting by arsonists and other criminals. Wildfires are inherently very dangerous, and the release of this information would cause a rise in deliberately started wildfires. Such incidents would be inherently dangerous to public safety.

Further, as some of these pipelines and powerlines are within areas identified as high risk on the map, the release of this information identifies areas where large scale wildfires could be intentionally caused to create maximum damage to the environment. The release of this information is therefore contrary to the goal of protecting the environment.

Public Interest Test

For these exceptions to apply, the public interest in maintaining these exemptions must outweigh the public interest in disclosing the information.

Public Interest in Disclosure

There are several reasons in favour of disclosure to the public at large as follows:

- it promotes transparency, showing that we have identified the risk of wildfires along with partner agencies in line with Home Office Guidance.
- it supports the public's interest in the environment and adds to the public debate.
- it would help people to understand whether they lived in an area vulnerable to wildfires.

- it evidences that we have not only created appropriate arrangements to handle wildfires, but that we have taken practical steps in line with those arrangements.

Public Interest Against Disclosure

There are several reasons against the disclosure to the public at large as follows:

- it can be used to facilitate and increase the effects of terrorist activities in our area leading to loss of life and the endangerment of the public.
- it would enable the planning and execution of more effective terrorist attacks causing large scale loss of life.
- it would enable the targeting of national infrastructure undermining national security.
- it would endanger the environment as it would identify areas that could be targeted by arsonists for maximum effect, causing destruction of the environment.

Conclusion

Having given due consideration to the presumption in favour of disclosure, as outlined in Regulation 12(2) of the Environmental Information Regulations 2004, we assert that the reasons against the disclosure clearly and significantly outweigh the interest in its disclosure. Public safety is of paramount importance to HIWFRS as is the prevention of wildfires. The release of this information would make wildfires and other incidents more likely to occur. Consequently, we are refusing to provide it per Regulations 12(5)(a) (National Security and Public Safety) and Regulation 12(5)(g) (Protection of the environment) of the Environmental Information Regulations 2004.

Emergency Response Arrangements Response Structure Extension number

In the document entitled EIR 016 HIOV-TV LRF Emergency Response Arrangements v5.01 July 2022_Redacted we have removed the extension number for the Operations Planning team that activates the LRF response. This is because this number is used as a key contact point for LRF partners to make contact during an incident. While we are not questioning the motives of the applicant, the release of this information would adversely affect the safety of the public as it would enable people to disrupt the response of partner organisations during times of emergency. This has the potential not only to undermine the response to emergencies but also, if done during life threatening circumstances, lead to a loss of life.

Public Interest Test

For these exceptions to apply, the public interest in maintaining these exemptions must outweigh the public interest in disclosing the information.

Public Interest in Disclosure

There are several reasons in favour of disclosure to the public at large as follows:

- It promotes transparency showing that we have a direct contact number to set up a LRF response.
- It evidences that we closely work with partners during a response.

Public Interest Against Disclosure

There are several reasons against the disclosure to the public at large as follows:

- It would enable the disruption of LRF's response to emergency situations.
- It would cause an increased loss of life.
- It would enable people to prevent and delay the setting up of an emergency response to critical incidents.

Conclusion

Being able to respond effectively and communicate clearly during times of emergency is great importance to ensuring the protection of the public. The release of the contact information for a key group within such a response would be detrimental to the smooth operation of the LRF and so would endanger public safety. As such we are refusing to provide this information per Regulation 12(5)(a) of the Environmental Information Regulations 2004.

Any future correspondence with Hampshire and Isle of Wight Fire and Rescue Service in relation to this matter should be sent to the Information Compliance Officer at the above address.

If for whatever reason you are unhappy with our response you may request an internal review by contacting DP@hantsfire.gov.uk or by writing to the Data Protection Officer at the above address.

Should you remain dissatisfied you can appeal against the internal review decision by contacting the Information Commissioners Office. This can be done online at www.ico.org.uk/foicomplaints or by post to The Information Commissioner, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

Yours sincerely

Information Compliance Officer
Hampshire and Isle of Wight Fire and Rescue Service