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[redacted]

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[redacted]

01 October 2026

Dear Madam

Re: Response to Prevention of Future Deaths Report
Inquest touching the death of Thomas Andrew James Combeer
Case Number [redacted]

I refer to the above matter and to your report (the Report") under regulation 28 of The Coroners (Investigations) Regulations 2013 ("the 2013 Regulations").

I write to set out the Council's response to the Report pursuant to regulation 29 of the 2013 Regulations, in particular the specific concerns raised at section 10 of the Report.

1. "*The multi-storey car parks in Guildford owned by Guildford Borough Council present a safety risk to the public (including children) of falling and that there are insufficient measures in place to prevent suicide.*"

Response

Guildford Borough Council ("the Council") has a variety of measures in place to minimise the safety risks to the public (including children) of falling and assist in preventing suicides at its multi-storey car parks ("MSCPs"):

(i) There are around 196 CCTV cameras installed at the Council's various car parks. 40 CCTV cameras are visible at any one time in the Council's Parking Control Room which is located at the Council's Parking Office. The CCTV cameras are monitored all day every day except for Christmas Day.

(ii) Of the 40 CCTV cameras that are visible, the cameras covering the upper levels of the MSCPs are always monitored.

(iii) Between 7:00pm - 7:00am every day, a third-party security provider - Madigan Gill - monitors the cameras and contacts the police and dispatches the mobile patrol personnel if any security-related incidents look likely to take place or occur. Outside of these hours, the CCTV cameras are monitored by Council officers.

(iv) The Council has adopted a procedure to deal with vulnerable persons if a camera operative is concerned for someone's safety. This procedure provides for the following:

(a) If an alarm is triggered, the camera operative should view the camera which has triggered the alarm and watch proceedings for 30-60 seconds to establish whether it is a false alarm, or a genuine suicide /anti-social behaviour situation.

(b) If the operative is concerned for someone's safety, procedure requires them to contact the police immediately.

(c) Between 6:00am – 6:00pm, the operative should contact the Council's enforcement officers using radio to request them to attend the car park and secure site. This enables enforcement officers to attend the site quickly and assist any vulnerable persons and inform the police.

(d) Between 6:00pm – 6:00am, the operative should contact the Council's Nightguard Mobile Patrol Officer using radio to instruct them to attend car park as a priority. This enables the patrol officer to attend the site quickly and assist any vulnerable persons and inform the police.

(e) These measures have been successful. On 05 September 2026 at York Road MCSP a vulnerable person was detected on CCTV. The nighttime security team called the police, who attended the site and successfully intervened before an incident took place.

(v) In addition, the follows measures relating to patrols are in place:

(a) Enforcement officers employed by the Council regularly patrol the Council's multi-storey car parks between 7:00am – 7:00pm every day.

(b) Between 7:00pm – 7:00am every day, a third-party security provider - Madigan Gill – conducts regular night-time mobile security patrols of the Council's multi-storey car parks. The operation consists of two members of Madigan Gill's staff, with one based in the Parking Control Room at Bedford Road MSCP, monitoring the CCTV cameras, and the other out in a vehicle conducting mobile patrols. The Council's enforcement officers also conduct evening patrols (up to 10pm) on a regular basis although these are not scheduled. Surrey Police also conduct overnight patrols although these are not scheduled.

(c) During the day, the Council's multi-storey car parks are also patrolled by Surrey Police and Town Rangers employed by Elevate Guildford Limited Trading (trading as Experience Guildford). These patrols are conducted regularly although they are not scheduled.

(d) All car park staff have received suicide awareness training and this will be refreshed on an annual basis and as part of the induction process for new starters.

(e) Signage for the Samaritans has been placed in areas at York Road MSCP and Leapale Road MSCP in locations agreed by the Samaritans around the edges of the MSCPs.

(vi) Following Mr. Combeer's death in 2025, the Council instructed industry leading experts, Stripe Consulting ("Stripe"), to advise of what further measures could be put in place at the Council's car parks to improve safety mitigate the risk of suicide. The Council has adopted their recommendations as follows:

(a) The measures to be implemented will include full fencing at York Road MSCP, which will provide edge protection of at least 110cm in all areas. This fencing will provide particular protection to upper-level perimeter edges, high-risk walkways, risk areas posed by internal ramps, high risk fall areas and easy climb routes. The contractor will be required to adhere to suicide-safer design principles, British Standards 6180, relevant Eurocodes, IStructE Guidance and Park Mark safety considerations. The Council has gone out to tender for the design of the full fencing and a contractor is expected to be appointed in or around December 2026, with works being carried out in February 2027. This option was assessed by Stripe to provide the highest level of protection out of the variety of options that they considered.

(b) The Council is also looking to install edge protection of at least 110cm at its other MSCPs where required with the aim of installation by February 2027.

(c) Pending the installation of permanent full-height fencing and edge protection, the Council is taking immediate action to install interim fencing at all necessary locations within its multi-storey car parks, beginning with York Road MSCP and Leapale Road MSCP. Budget is in place and specialist contractor Stripe has already been engaged and is ready to commence these works. The interim fencing will be securely fixed to the structure of the car parks to create a robust physical barrier designed to prevent falls and enhance public safety. The Council is prioritising this work and will progress installation imminently, with the programme scheduled for completion by the end of 2026 while longer-term permanent safety measures are developed and implemented.

2. "*More widely, current Building Regulations guidance and the British Standards guidance may conflict about the height of guarding*."

Response

Section 6 of the Building Act 1984 enables the provision of Approved Documents. The section describes Approved Documents as "practical guidance". On that basis it is not considered there is conflict between Building Regulations and Approved Documents.

3. "*Building Regulations are not retrospective and therefore older multi-storey car parks built before Building Regulations 2010, Guidance: Approved Document K came into force in 2013 may not have or are not required to have the current edge protection height of 110cms*."

Response

As stated above, the Council will install edge protection of at least 110cm in all of its MSCPs. The Council will carry out these works as a matter of priority with the aim of installation by February 2027. In the meantime, the Council is taking immediate action to install interim fencing at all necessary locations within its multi-storey car parks, with the programme scheduled for completion by the end of 2026.

4. "*There have been at least 4 deaths from York Road Car Park and one other multi-storey car park in Guildford since 2020. Although a report in 2020 recommended safety measures including increased guard height, the majority of the recommendations were not implemented for cost reasons*".

Response

It is correct that in 2020, officers considered the option of additional edge protection at its car parks but this did not proceed at the time. No formal decision was made by members or any committee of the Council. However, other measures have since been implemented, including:

(i) Enhanced CCTV and procedures, as further described in the response to point 10 below.
(ii) Car park staff receiving suicide awareness training;
(iii) Signage for the Samaritans;
(iv) Increased and enhanced patrols, as further described in the response to point 9 below

5. "*The public, including children, have unfettered access to those car parks, day and night*."

Response

York Road MSCP is a 24-hour car park and therefore by its nature it is required to be open during the night to enable people to park and retrieve vehicles. The Council has instructed its officers and third-party security providers to remove children playing in the premises if they are seen on CCTV or whilst on patrol.

6. "*The higher levels of the York Road Car Park is popular with skateboarders because of the higher ceilings*.

Response

The Council is aware the skateboarders have used York Road MSCP. The Council has instructed its officers and third-party security providers to remove them from the premises if they are seen on CCTV or whilst on patrol.

7. "*The guard edge at the York Road Car Park is 95 cms from the bottom of the parapet wall to the top of the handrail*."

Response

The guard edge at York Road MSCP fluctuates in height. In some areas the height is 110cms and in some areas it is less. As stated above, the Council will install edge protection of at least 110cm in all of its MSCPs. The Council will carry out these works as a matter of priority with the aim of installation by February 2027. In the meantime, the Council is taking immediate action to install interim fencing at all necessary locations within its multi-storey car parks, with the programme scheduled for completion by the end of 2026.

8. "*The guard edge does not meet the minimum height (110cm) required under Approved Document K to Building Regulations*."

Response

As stated above, Approved Document K is "practical guidance". The Council will install full fencing at York Road MSCP, which will provide edge protection of at least 110cm in all areas. The Council will carry out these works as a matter of priority with the aim of installation by February 2027. In the meantime, the Council is taking immediate action to install interim fencing at all necessary locations within its multi-storey car parks, with the programme scheduled for completion by the end of 2026.

9. "*Security staff are not located on individual car park premises at night but at a central control office from which they operate patrols*."

Response

Details concerning patrols are set out in our response to point 1 above. Since March 2025, patrols are now also undertaken during the day by Guildford Borough Council's enforcement officers, as well as Experience Guildford's Town Rangers, and during the day and night by Surrey Police. Further, the night patrols of the car parks by the Councils third-party security provider have also been revised and now concentrate almost exclusively on the MSCPs, thereby increasing the frequency of patrols. MSCPs are now visited on average 8 times per night as opposed to 4 times per night.

10. "*Guildford multi-storey car parks have limited CCTV coverage*."

Response

Details concerning CCTV coverage are set out in our response to point 1 above. Since March 2025, upgraded CCTV cameras have been fitted, two at York Road MSCP and four at Leapale Road MSCP. The extended CCTV at York Road MSCP now covers the area concerning this incident. The system is visual only and is monitored from the parking operations office at Bedford Road. These new systems trigger an alarm if anyone loiters close to the edge on the top two, split levels of each MSCP. The cameras are in high-definition and provide enhanced night-time image quality. The CCTV camera operative procedure referred to at paragraph 1(iv) above was implemented in July 2025.

11. "*And that in relation to multi-storey car parks more widely;*
a. There is a potential conflict between Building Regulations 2010, Guidance: Approved Document K and British Standards, Code of Practice for barriers in and about buildings. It is not clear from the guidance and standards where the start point for the measurement of the barrier is to be taken, whether floor level or top of parapet.
b. Multi-storey car parks built before Building Regulations Approved Document K (Section 2) came into force in 2013 may not meet the current guard height."

Response

The Council will install edge protection of at least 110cm in all of its MSCPs. The Council will carry out these works as a matter of priority with the aim of installation by February 2027. In the meantime, the Council is taking immediate action to install interim fencing at all necessary locations within its multi-storey car parks, with the programme scheduled for completion by the end of 2026.

For the avoidance of doubt, the Council is aware of the Multi-Storey Car Parks (Safety) Bill and will ensure that it is complied with in due course.

Yours sincerely

[redacted]
Joint Chief Executive
Joint Leadership Team
Guildford Borough Council