

Mid & West Wales
Fire & Rescue Authority

Consultation Report
Draft Risk Reduction Action Plan 2008/09

September 2007
Strategic Planning and Performance Department
Service Headquarters

Contents

	Page
1.0 Executive Summary	2
2.0 Introduction and purpose of the report	5
3.0 Consultation Strategy and methodology	6
3.1 Consultation – External Stakeholders	6
3.2 Consultation – Internal Stakeholders, Staff and Representative Bodies	8
3.3 Media Strategy	8
4.0 Informal discussion with the Welsh Assembly	8
5.0 Profile of Respondents	9
6.0 How we Analysed Responses	11
7.0 Results from Consultation	12
7.1 Upper Amman and Swansea Valley Areas	12
7.2 Duty Systems	24
8.0 Conclusions	27

1.0 Executive Summary

The Authority's vision for Mid and West Wales Fire and Rescue Service is one of increased performance and improved services. We are already good at what we do, but we want to be better. At the end of October 2006 Mid & West Wales Fire & Rescue Authority approved its first Risk Reduction Plan entitled 'Making our Community Safer'. The plan covers the 3 year period of 2007-2010 and was developed to the Welsh Assembly Government's guidance - "Wales a Safer Country" and the "Fire and Rescue Service National Framework for Wales". The 2008/09 Draft Risk Reduction Action plan builds on the foundation of the 3 year plan and was published in May 2007 and consulted on two main proposals. The proposals underwent a wide-scale consultation process to gauge the views of the public, key stakeholders and staff. This report summarises the process of consultation, the responses received and the outcomes of this exercise.

Proposals

There were two main proposals contained in the Draft Action Plan for 2008/2009. These were:

1. Risk Reduction options for the Upper Swansea and Amman Valley.

This proposal consulted on changing the crewing at Pontardawe fire station from 24 hour whole-time crewing to day crewing, where whole-time fire fighters would be at the station during the times of greatest risk and activity, outside of this time fire-fighters would be retained and be called to attend only when incidents occurred. A brand new community fire station is proposed in the Upper Amman valley with the second appliance from Ammanford being relocated to the new site. This proposal predictably generated the greatest response particularly from members of staff and elected members in the communities directly affected. The Authority was surprised that there were few responses in support of the proposals, particularly from the area where it is proposed to provide the station. Many of the responses in support came from communities outside of the area that were generally supportive of the Authority's efforts in reducing risk in this area.

The majority of respondents recorded their opposition to the proposal despite efforts to provide stakeholders with a clear picture of the detail and benefits of the proposal by means of public meetings and presentations to Assembly Members, Unitary Authorities and Town and Community Councils and to staff at the stations affected.

Most responses were received by completing the questionnaire provided, some comments were recorded during the meetings and briefings provided but many respondents chose to provide lengthy letters or reports outlining their concerns. The main responses in opposition to the proposal were received from:-

- Staff directly affected by the proposals
- Members of Parliament and Assembly Members
- Town and Community Councils,
- Members of the public in the Pontardawe area
- Neath & Port Talbot County Borough Council

Neath & Port Talbot Council in their formal response stated that they were impressed with the Authority's community safety achievements but they were strongly opposed to changing the crewing at Pontardawe. This response was made following a briefing to the council by senior officers. Local authority members for the area concerned also responded separately voicing strong opposition to the proposal. Responses were received from two Members of Parliament and 8 Assembly Members. A local Member of Parliament and several of the local Assembly Members objected to the proposal, but areas of concern were also raised by the other Assembly Members and a Member of Parliament. A 5,000 signature petition signed by local residents opposing the proposal was submitted by a local Assembly Member. An on-line petition was also established on the Prime Ministers website. There was a notable lack of support from the communities in the Upper Amman Valley where the new station was proposed and this greatly surprised and disappointed the Authority.

The main areas of concern, which are explored further in the main body of the report were:-

- The increase in response time for the Pontardawe appliance at night
- The validity of the Fire Service Emergency Cover (FSEC) model predictions
- The activity data published
- The recruitment, training and retention of retained crews
- The clarity of the proposal
- The business case and implementation plan
- Financial considerations

All the responses received to the consultation were analysed and all the areas of concern were considered in detail. It was found that all of the points raised had been identified and taken into account by the Authority prior to making the proposal. The level of response and opposition to the proposal was also examined and evaluated. The Authority is satisfied that no new evidence was presented as part of the consultation, and that the professional argument for the proposal remains sound. The implementation of the risk reduction proposals for the Upper Amman and Upper Swansea Valley is therefore valid and will commence in 2008/2009.

The Authority recognises that implementing the changes in the Upper Amman and Upper Swansea Valley will involve detailed project planning and this project planning will take account of areas identified by the Authority and confirmed as a result of the consultation process. The realisation of the changes will take time, effort and investment on the part of the Authority and will involve working with partners to maximize the benefits of the improvements.

2. Duty systems at shift duty stations.

A review of the duty system at shift stations is required as the existing arrangements are inflexible and often the number of fire fighters on the appliance is below what is considered to be the optimum. The Authority want to increase the number of fire fighters on the pump to improve safety and to provide the correct number on duty at all times, therefore making the best use of resources. A consultancy was appointed in early 2007 to work with officers to research better ways of rostering our staff conditioned to the shift duty system. The initial feasibility study for this work has been completed and a number of different options are available. The Authority felt that it was essential that this was consulted upon in the draft action plan. This would enable staff and other stakeholder to provide their views on what was important to them from a duty system and would inform the ongoing review.

Staff were encouraged to provide their views on what was important to them and what they wanted from a new duty system and predictably the majority of comments were from staff. Some responses were also received in general support of the proposal mainly from Town and Community Councils who also recommended that some conditions should apply to the implementation of the proposal. These comments were as follows:-

- Changes should be justified through robust analysis and clear evidence
- Response time and weight of attendance should not be affected
- Staff and representative bodies should be consulted with and involved in the decision making.
- Support and flexibility should be provided to assist staff conditioned to the new system.

Staff had strong opinions on what was important to them and many comments were raised in the following areas:-

- They believed an examination of the Duty System was not necessary
- There was insufficient information available on the proposal
- This was a cost cutting exercise
- Reduction in numbers on duty would impact on crewing of special appliances
- Consultants do not understand station routines

From the responses received it was apparent that the most important factor of any change to the system was the maintenance of the existing *4 on 4 off* shift system, where a working pattern of 2 days and 2 nights is followed by 4 off duty days. This shift pattern was liked for the following reasons:-

- This shift pattern is family friendly and flexible
- The system accommodates existing routines on station
- Annual leave can be predicted and booked in advance
- Off duty time allows adequate rest periods between shifts
- Close working relationships are developed

The responses received have been invaluable in providing confirmation on what staff and the community want from a duty system. Concerns on how any changes should be implemented and the need to provide efficiencies but not affect the operational capacity have been noted and will be used to inform the process. No evidence was presented during the consultation to contradict the main objectives of the proposal.

It has been acknowledged that the project will require some investment to provide a framework to work effectively, but these costs will be more than offset by the benefits of using our resources more effectively and improving fire fighter safety and availability. The results of the consultation will now be used to inform the project on changing duty systems and the project will progress as follows:-

- A working group will be established
- Detailed proposals will be drawn up in conjunction with staff
- Focus groups will be arranged
- Negotiations will be undertaken with representative bodies
- A communication programme with directly affected staff will be developed.

2. Introduction and Purpose of this report

The Authority's vision for Mid & West Wales Fire & Rescue Service is one of improved performance and service. We are already good at what we do, but we want to be better. Mid & West Wales Fire & Rescue Authority approved its first Risk Reduction Plan entitled ' Making the Community Safer' in October 2006. The plan covers the 3 year period of 2007-2010 and was developed to the Welsh Assembly Guidance – "Wales a Safer Country" And the Fire & Rescue Service National Framework for Wales".

The first step in the implementation of the plan has been the production of the 2008/09 and beyond Draft Action plan which reports on what we have already achieved and what we will implement in 2008/2009. Following consultation, the final Action plan for 2008/2009 will be reported in a joint document which will also incorporate performance and improvement information that will accommodate 'The Wales Programme for Improvement (WPI)' requirements.

As part of the Risk Reduction Plan process the Authority instigated a wide-scale consultation process to gauge the views of the public, key stakeholders and staff on the draft action plan and its key proposals. Over a 1000 copies of the draft action plan were distributed to identified key stakeholders and it was made widely available on the Fire & Rescue Service's web-site, in libraries, at all fire stations and other service delivery points. The consultation was undertaken strictly in accordance with Welsh Assembly Government and Risk Reduction Planning requirements and best practice models.

In consideration of the wide distribution and availability of the draft action plan and the large number of key stakeholders consulted with, including all our 1400 staff a disappointingly low 131 responses were received. The Fire Authority is however, extremely grateful to all those who took the time and effort to provide us with their views on the proposals, all the responses have been considered in preparing the report.

This report reviews the comments and judgments of the respondents to the consultation, with particular emphasis on the two main proposals of risk reduction in the Upper Amman and Upper Swansea valley and changes to the Duty System. Responses to these proposals have been analysed and the points raised have been reported by grouping together the main themes of the responses. This report seeks to accurately and fairly summarise the responses and the strength of feeling for each of the areas of concern in order to reflect the outcomes of the consultation process. The Service response is provided to the points where areas of concern have been voiced. All comments received have been carefully considered by Members and the final document will be developed as a result of the consultation comments received.

3. Consultation Strategy and Methodology

The Draft Risk Reduction Action Plan was released on the 22nd May 2007 and there followed a twelve week consultation period until the 14th August 2007. A comprehensive communications plan was developed in order to reach as many stakeholders as possible and this was an important part of the overall project and was comprised of three main elements which were:

- **Consultation**

This consultation plan was produced in accordance with Welsh Assembly Government Risk Reduction Planning guidance and the cabinet office model code. Welsh good practice models were also used.

- **Media**

The Media strategy was used to provide a proactive link to the public that would help to inform and reassure them on the proposals contained in the plan at a time of considerable change and uncertainty.

- **Information exchange**

Information exchange encompasses the broad exchange of general information that may arise during the development of the Risk Reduction Plan.

The method of consultation used was in the main qualitative. The majority of the information received was by means of the responses received from the questionnaires, responses were also collected from briefings at public meetings and to local authorities, community councils, staff and local politicians. This process was designed to encourage an open-ended exchange of ideas, conceptual rather than statistical, and interpretative rather than mathematical. This report is concerned with the meaning of people's views rather than with their statistical distribution. The weight of response on some of the issues raised has however been taken into account. The findings reported cannot be certified at a determinate confidence level as statistically representative of all people in Mid and West Wales but the mechanisms used allowed for comments from a wide cross-section of people. The Authority believes the findings are indicative of a wide spectrum of opinion – as a guide to what might be called informed debate, based upon consideration of the issues.

The Authority used a variety of methods to consult with stakeholders. These are detailed below:

3.1 Consultation – External stakeholders

3.1.1 Direct consultation

The Authority considered the following organisations to be its key and external stakeholders who were asked for their detailed views on the proposals contained within the draft plan either as an individual or as a representative group or association. The stakeholder list is consistent with Welsh Assembly Guidelines.

- Constituent Unitary Authorities and their Chief Executives
- Town and Community Councils
- Members of Parliament and Assembly Members
- Brecon Beacon and Pembrokeshire National Parks Authority
- Bordering Fire Authorities
- Representative Bodies
- South and North Wales and Dyfed Powys Police and the Welsh Ambulance Service Trust
- H M Coastguard and other groups
- Community Safety Partnerships
- Voluntary Organisations within the Fire Authority's area
- Ethnic minority groups within the Fire Authority's area
- Chamber of Commerce and Trade organisations representing the Mid & West Wales area
- Environment Agency
- The general public
- Members of staff

3.1.2 Web Site

The Authority has a Risk Reduction section on its web site and the draft Risk Reduction Action plan was prominently posted on this site, and allowed for responses to be made electronically. Background information on the process and previous Risk Reduction Plans and responses were also included on the site which also gave access to press releases on the plan.

3.1.3 Draft Risk Reduction Action Plan 08/09 distribution

The Authority wrote to all stakeholders in early May to inform them that the draft Risk Reduction Action Plan 08/09 would be available for viewing on the website from 22nd May 2007 ahead of the distribution of printed copies. This was to allow as much notice as possible and to avoid any shortening of the consultation period due to Council meeting schedules.

The existing key stakeholder contact database was updated in accordance with Welsh Assembly Government guidance on consultation and the Authority distributed printed hard copies of the draft document to all identified stakeholders. The document included a consultation response questionnaire to allow stakeholders the opportunity to make their comments. Copies of the plan and the response form were distributed to County main libraries who arranged the distribution of the plan to smaller and mobile libraries within the Authority's area in order to provide widespread public access. The press release providing information on the consultation included information on where and how to access the plan.

3.1.4 Local Authorities

The Authority wrote to the Leader of each Council offering a specific briefing in the early stages of the consultation to ensure they had absolute clarity on what was being proposed. This was copied to each respective Chief Executive and a number of briefings were given. The Authority was particularly pleased that briefings were taken up by Neath Port Talbot, Carmarthenshire and Powys County Councils.

3.1.5 Assembly Members / Members of Parliament

The Authority wrote to each Assembly Member and Member of Parliament offering a specific briefing on the plan during the consultation period to ensure they had absolute clarity on the proposal, and an opportunity have their questions answered. The Head of Operational Risk Management discussed with Welsh Assembly Government officials the exact mechanism for conducting such briefings. This briefing took place at Fire & Rescue Headquarters in Carmarthen on 20th July 2007 and a number of Assembly Members and a Member of Parliament representing the electorate in the Authority area attended. Separate briefings for Assembly Members who could not attend and wished to address specific issues were also provided. The Authority is extremely grateful to Assembly Members and Members of Parliament who took the opportunity to receive briefings, enabling the Authority to give absolute clarity to the proposals and the rationale behind them.

3.2 Consultation – Internal stakeholders, Staff and Representative Bodies

At the beginning of the 12 week consultation process the Service produced a Chief Fire Officer's memoranda relating to the Risk Reduction Planning process for the benefit of staff. Principal Officers visited the fire stations in the areas directly affected by the proposal to change crewing in order to have personal discussions with crews and provide feedback on their comments. Each fire station and support department was provided with a copy of the draft Risk Reduction Action Plan. Personnel were reminded that the document could also be viewed electronically via the internal Business Information Server network. All non-uniformed and operational department heads were provided with their own copy of the plan. Further briefings for staff were given at a number of seminars.

All recognised representative bodies within Mid & West Wales Fire & Rescue Service were consulted with on the proposals. A lengthy and detailed report in response was received from the Fire Brigades Union (FBU) and a letter providing their comments was also provided by the Retained Firefighters Union (RFU). Discussions took place by means of the Authority's Joint Consultative Committee mechanisms.

3.3 Media Strategy

The media was used as much as possible to ensure that communities were kept informed of the publication of the draft Risk Reduction Action Plan, and the key proposals and associated community safety benefits. It was also used to detail the consultation process and how the public could contribute to the preparation of the final plan.

- The Authority issued a press statement to all media sources in order to launch the draft RRP at the start of the public consultation stage. Press interviews were given on request. The Service's website was updated throughout the development of the plan. Press releases were made throughout the period of consultation in response to media queries and articles. and a series of themed press releases were distributed to the media throughout the consultation phase. This provided succinct overviews of the proposed improvements.
- The Press and PR Officer was responsible for monitoring the media throughout the consultation process, advising members and officers of reports and any emerging issues. A media release will be made to coincide with the publication of the final plan and outcomes of the consultation.

4.0 Welsh Assembly Government discussion

As part of the Welsh Assembly Government Risk Reduction Plan guidance, the Authority is required to meet with the Minister to discuss the plan. The timing of the Assembly elections and the period prior to this co-incided with the expected date of the Ministerial consultation and consequently this meeting with the Minister had to be delayed.

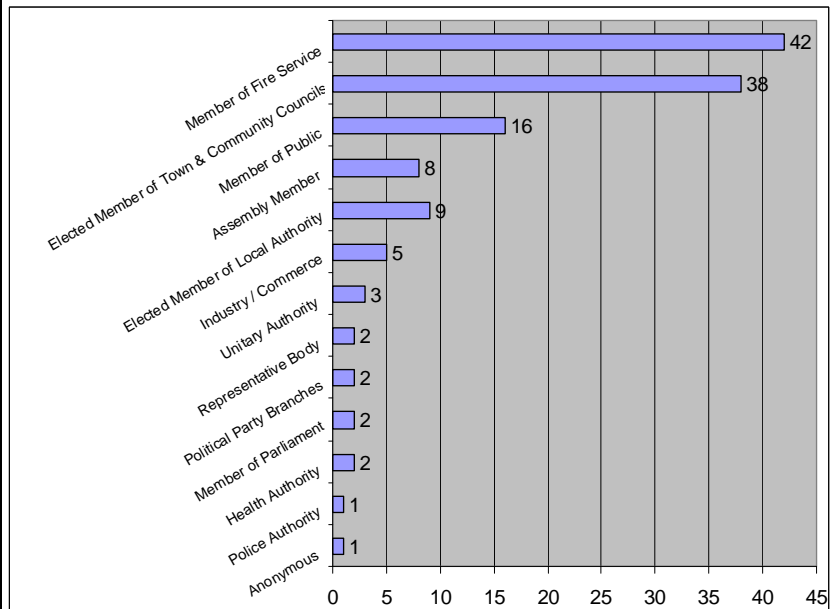
Following the Assembly election on May 3rd 2007 there followed a delay in appointing a Cabinet and a Minister for Social Justice and Local Government. The Authority was unable to follow its usual process and meet with the Minister within the normal time scales. Further re-organisation of the Welsh Assembly Government Cabinet resulted in a change of Minister for Social Justice and Local Government and Dr. Brian Gibbons was appointed to this role. A meeting was held between the Chair of the Authority, Members, the Chief Fire Officer, other senior officers and Dr Gibbons in early September to provide dialogue with the new Minister and make him aware of the progress of the consultation. The outcomes of the discussion has not necessitated the Authority to consider any fundamental amendment to the plan.

5.0 Profile of Respondents

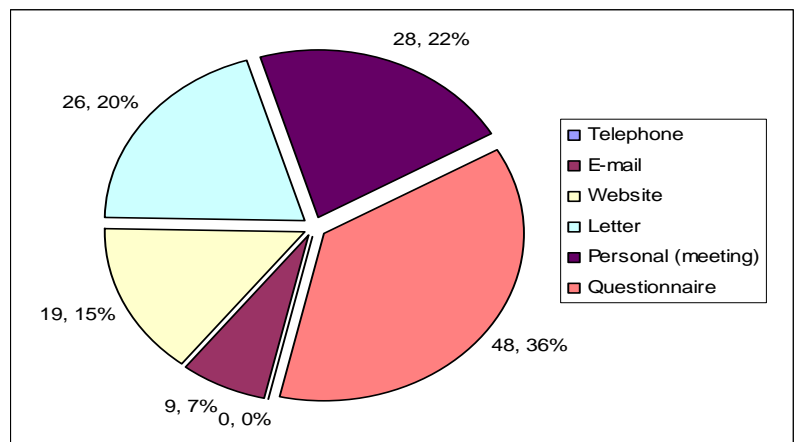
To accommodate responses to the Authority's proposals on risk reduction, questionnaires were distributed with the plan which allowed respondents to provide their comments on the two main proposals. General comments on risk reduction were also recorded. This response form was also available on the Authority's web site to allow as wide a range of response opportunities as possible.

The form included an optional section to record details on the respondent and if appropriate the organisation they represented. This allowed for analysis of the number and type of respondents and whether they were making personal comments or responding on behalf of an organisation. Summarised below is the profile of the 131 respondents and how they made their comments.

Respondent Type	No.
Anonymous	1
Police Authority	1
Health Authority	2
Member of Parliament	2
Political Party Branches	2
Representative Body	2
Unitary Authority	3
Industry / Commerce	5
Elected Member of Local Authority	9
Assembly Member	8
Member of Public	16
Elected Member of Town & Community Councils	38
Member of Fire Service	42
Total	131



How response received	No.
Telephone	0
E-mail	10
Website	19
Letter	26
Personal (meeting)	28
Questionnaire	48
Total	131



Petitions

- A petition with over 5,000 signatures opposing the proposal to make changes to the crewing at Pontardawe Fire Station was forwarded as part of the consultation by a local Assembly Member. This was accepted by the Authority as part of the consultation.
- Fire Authority Members are also aware of an online petition that has been established on the No 10 Downing Street petition website which has been supported by over 150 entries, some of whom also contributed to the formal consultation. The Authority will not consider this petition as it states 'to prevent the downgrading or **closure** of Pontardawe Fire Station'. This is misleading and is not what is proposed in the draft action plan.

Ratio of responses received

In order to show the ratio of responses we received from our stakeholders in comparison to the number of documents that were circulated, the table below provides information on the main respondent groups. In addition to being sent directly to stakeholders, the plan was also widely publicised and was available on the Authority's website. This information is therefore only provided as an estimate of the availability of the plan.

Respondent Type	Number of plans circulated	Number of responses received.
Member of Fire Service	At least 1 Plan was sent to all fire stations and departments. Approximate number of staff 1400	42
Town and Community Councils	Over 370	38
Member of Public	Copies placed in all libraries Plan widely publicised in press and on website	16
Elected Member of Local Authority	All Council Leaders	9
Assembly Member	21	8
Member of Parliament	12	2
Unitary Authority	6	3
Representative Body	6	2

Late responses

The Service received a small number of late responses, these were mainly from members of staff and it was possible for the Authority to consider the comments in the production of this report in order to accommodate as many respondents as possible and to obtain the widest range of views on the proposals.

6.0 How we analysed responses

The majority of responses to the consultation were received on the questionnaires provided with the plan and on the website. The questionnaire provided a free text section for each of the proposals in order that respondents could make their comments. General comments on risk reduction planning were also recorded.

Some respondents did not complete a questionnaire but submitted an e-mail, letter or report containing their response. Comments were also recorded at various meetings and briefings attended where opinions and views were expressed on the proposals. All the responses were recorded on a database that had been established specifically for this purpose.

Various media articles have been published in the press, particularly on the proposal for the Upper Amman and Swansea Valley, such articles often contain incomplete and misleading commentary. The Authority has viewed the statements made as very much a part of the overall consultation process and has taken the opportunity to present some of the hard facts, not simply the emotive issues surrounding the key proposals in order that the public can make better informed judgments rather than having to rely on the often one sided commentary which has appeared in the press. The media articles have of course been considered and used to gauge the strength of local views.

Responses to these proposals have been analysed and the points raised have been reported by grouping together the main themes of the responses reflecting the particular area of concern. The number of respondents who made comments and their profile is shown to demonstrate the weight of response for each particular area of concern.

This report seeks to accurately and fairly summarise the responses and the strength of feeling for each of the areas of concern in order to fully reflect the response to the consultation process. The Service response for each area of concern is shown to provide a balanced view. The final risk reduction action plan will be developed as a result of the consultation comments received.

7.0 Results from consultation

The draft action plan consulted on two main proposals scheduled for 2008/09 and beyond:-

7.1 Proposal 1 – Risk Reduction Options for the Upper Swansea and Amman Valley Areas

In 2006 the Authority assessed its proposal to introduce day crewing at Pontardawe Fire Station against the Welsh Assembly Government's RRP guidance and their Service Standard for fires in the home. This involved extensive risk modeling particularly in the Upper Swansea and Amman Valley areas. It was reported in the Risk Reduction Plan 2007-2010 that there were alternative methods for reducing risk in this area and a further analysis would be undertaken in 2007 and that Pontardawe Fire Station would remain whole time crewed in 2007/2008.

The review of the risk in the area under consideration has been undertaken using information on high risk dwellings provided by the Fire Service Emergency Cover Model (FSEC), analysis of incident activity and the risk profile of the area. The FSEC model is the preferred risk analysis tool of the Welsh Assembly Government. Several options for reducing risk and providing the best use of resources were considered and the option that provided the best balance between cost and benefit and that would allow the Authority to reduce risk across Mid & West Wales was consulted upon in the Draft Action Plan.

It was proposed to:-

- Change the crewing at Pontardawe to day crewing
- Provide a new retained fire station in the Upper Amman /Swansea Valley to improve our response times and meet the Service Standard for fires in the home
- Relocate the second fire engine from Ammanford fire station to the proposed new station, the exact location to be determined

7.1.1 Support for the Proposal

This proposal predictably generated a large response particularly from members of staff and elected members in the communities affected. There were some responses in support of the proposals and many of these came from communities outside of the area who were generally supportive of the Authority's efforts in reducing risk.

Some respondents declined to respond on this proposal because they felt they were not directly affected by the changes. There was a notable lack of response from the communities in the Upper Amman Valley where the new station was proposed. The Retained Firefighters Union made positive comments on the provision of a new retained station as a means of supporting the community and the benefits it would bring.

The areas of support for the proposal, or aspects of the proposal are shown below. This section also includes a suggestion regarding site sharing at Pontardawe Fire Station.

Respondents areas of support	Respondent Type	Response
Changes <i>'well considered'</i> and <i>'clearly substantiated'</i>	Town and Community Council	2
Support making the most effective use of fire service people and money, and of providing fire and emergency cover in high risk and disadvantaged communities as this will reduce risk.	Political Party Branch Town and Community Council Member of the Fire Service	6
The activity level for Pontardawe is lower than some day crewed stations.	Town and Community Council	1
<i>'Shared Community resource with Police/Ambulance in the Upper Amman Valley makes good sense and could lead to further valuable co-operation between services'</i>	Town and Community Council	1
Second appliance at Ammanford should be removed anyway due to low call rate	Member of the Public	1
<i>'Establishing a new station will not be easy. However, if it is achieved sympathetically and incorporates young firefighters and a Co-Responder scheme then it will stand a very good chance of making a significant improvement to the safety and quality of life in these communities.'</i>	Representative body	1
General Support for proposal	Town and Community Council Unitary Authority - Powys	3
Support for the provision of a new station but not for changes in Ammanford or Pontardawe	Members of Fire Service Town and Community Council	4
Suggestion	Respondent Type	Response
Combine Pontardawe Fire Station with Pontardawe Ambulance Station	Assembly Members Members of the Fire Service Representative Body Elected members of Unitary and Community Councils	8

7.1.2 Opposition to the Proposal

The Authority's reasons for consulting on this proposal were clearly outlined in the draft action plan. Efforts were also made to provide stakeholders with a clear picture of the detail and benefits of the proposal by means of press releases, public meetings and briefings to Assembly Members, Unitary Authorities, Town and Community Councils and the fire station crews affected.

Despite these efforts to counter some of the misleading messages and facts that had been circulated, there was a vocal, concerted and almost unanimous response in opposition to the proposal. Some lengthy and detailed responses were received outlining areas of concern and disputing the information contained in the plan. These responses came from members of staff, the public, Assembly Members, the Fire Brigades Union, and elected members for the areas affected.

Most respondents provided their comments by completing the questionnaire provided and responses were also recorded during the meetings and briefings provided. The main opposition responses to the proposal were received from:-

- Members of Parliament and Assembly Members
- Neath & Port Talbot Council and individual Local Authority Members
- Town and Community Councils
- Members of the public
- Fire Brigades Union
- Members of staff

Neath & Port Talbot County Council, Assembly Members and Community Organisations

Senior officers attended a meeting at Neath & Port Talbot Council where members were provided with a briefing and an opportunity to air their concerns and have their questions answered. The Council in their formal response stated that they were impressed with the community safety achievements but they were strongly opposed to changing the crewing at Pontardawe. The local authority members for Gwaun Cae Gurwen and Lower Brynamman also responded separately voicing their strong opposition to the proposal.

No support for the proposal was shown by Assembly Members or Members of Parliament and the local Assembly Members provided a lengthy response opposing the changes. The Association that represents Town and Community Councils in Wales and the 'Communities First' co-ordinator for the Upper Amman Valley both opposed the proposal.

Petitions

The local Assembly Member also forwarded a 5,000 signature petition signed by local residents opposing the proposal. The Authority is also aware of, but will not consider a petition that was established on the 10 Downing Street website. This petition includes the statement '*to prevent the downgrading or **closure** of Pontardawe Fire Station*'. This is misleading and is not what was proposed in the draft action plan.

Members of staff, the public and Representative Bodies

Members of staff from the affected and surrounding stations provided responses, many of them detailed, outlining their opposition and the general response from the public rejected the proposal. The Fire Brigades union provided a lengthy and detailed report outlining their strong opposition to all aspects of the proposal.

Key areas of concern

The key areas of concern for the proposal were as follows:-

- Risk
- Use of statistics and FSEC results
- Provision and maintenance of retained crews
- The clarity of the proposal
- The business case and deliverability of the proposal
- Financial Considerations
- Other concerns

7.1.3 Risk

Respondents maintained that this proposal would increase risk in the Pontardawe and surrounding areas which contradicted what the draft plan was proposing. Their main concern being the additional response time for the Pontardawe appliance when being crewed by firefighters covering from home. This had been considered by the Authority, and as the activity level was similar to other stations with a similar profile this was felt appropriate. Vastly exaggerated retained response times were quoted in responses. Actual response times for incidents attended by existing day crewed stations were analysed prior to the consultation and were used to predict an additional response for this appliance. The average additional response was predicted at less than 4 minutes but as this is an average figure respondents were able to refer to incidents where the retained response was higher, these statements were misleading but were widely quoted and accepted and used to base responses from all levels.

Respondent's concerns on Risk	Fire and Rescue Authority's response	Response
<p>Changing the crewing at Pontardawe will increase the response time when the station is retained crewed. This will reduce the service and increase the risk to the residents of Pontardawe. As this is a strategic location it will also increase the risk to the surrounding areas.</p> <p>The average additional response time quoted by the Authority is challenged. Respondents believe that response time will be greater with various response times quoted up to 10-14 minutes.</p>	<p>Response time will increase during the time the station is retained crewed.</p> <p>The average additional response predicted is less than 4 minutes. This has been calculated by examining the response times at other day crewed stations that have similar risk and activity profiles to Pontardawe and operate effectively.</p> <p>Data is independently validated.</p> <p>This extended response time will apply during the time of lower activity. The station will continue to maintain its capability to support surrounding areas.</p>	70
<p><i>This was by the far the greatest area of concern for respondents with over half of the total respondents raising this as an area of concern. The majority of responses were from members of the service but also included Assembly Members, members of the public, Town and Community Councils, elected members, Neath and Port Talbot Council and local businesses</i></p>		
<p>A large number of properties are being built in the area. These properties increase risk and therefore the need for a 24-hour whole-time crew</p>	<p>New housing provides less of a risk as they are built to comply with building regulations that comply with latest Fire Safety recommendations such as hard wired smoke alarms and this will have been taken into account. The station will continue to maintain its capability to attend incidents when they do occur. Risk is dynamically analysed by way of FSEC and the risk reduction planning process.</p>	7
<p><i>Raised by staff, representative body, Town and Community council member and local business.</i></p>		

<p>Safety at high risk sites in the Pontardawe area could be affected by increased response time at night.</p>	<p>Incidents at high risk sites are provided with an increased attendance from surrounding stations and the increased response will not be significant. Specialist plans are in place for such risks</p>	<p>2</p>
<p><i>Raised by a member of the public and Town and Community Council member.</i></p>		
<p>The current mix of whole-time and retained crewing arrangements at Morrision may impact on their availability to provide cover in Pontardawe.</p>	<p>The crewing arrangements at Morrision are appropriate to the activity level and risks within the station ground and its support to other stations.</p>	<p>3</p>
<p><i>Raised by Assembly Members, staff and Town and Community council member.</i></p>		
<p>The proposed new station in the Upper Amman Valley will not improve attendance time in the Upper Swansea Valley.</p> <p>The Upper Amman and Upper Swansea valleys are in different areas and one station cannot provide the cover for both areas.</p>	<p>The provision of two new fire stations, one in the Upper Amman valley and one in the Upper Swansea valley was considered. The establishment of two stations as part of one proposal was not feasible. The station was therefore proposed in the area of highest risk in order to improve the response to incidents.</p>	<p>5</p>
<p><i>Raised by members of staff, elected member of local authority and Representative body</i></p>		
<p>Removal of the second appliance from Ammanford will increase risk in the Ammanford area. There is no case for the removal of the second appliance from Ammanford</p> <p>New housing developments in the area increase risk.</p> <p>Proposal will impact on retained crews and specialist appliances sited at the station.</p>	<p>The second appliance in Ammanford currently attends on average less than 70 incidents a year, and the area is well supported by appliances from the surrounding area. This appliance is not being removed but relocated to another area of the Amman Valley.</p> <p>New housing provides less of a risk as they are built to comply with Fire Safety building regulations and this will have been taken into account</p> <p>No reduction in retained capability is currently being proposed. Training and crewing of special appliances has been considered.</p>	<p>17</p>
<p><i>Raised by Assembly Members, Town and Community Council and local authority members, representative body and the Health Authority</i></p>		

7.1.4 Use of Statistics and FSEC results

FSEC Predictions

The Welsh Assembly Government has recommended the use of the FSEC model to provide information in order to achieve the Service Standard for fires in the home. The FSEC model has been developed following extensive Pathfinder trial validations. The model uses census information to provide information on risk and this risk is mapped for each area of land known as 'output areas'. Each output area contains approximately 125 dwellings or 300 persons, therefore the more rural an area, the bigger the output area. The road network has been researched and the default settings have been calculated using average road speeds.

FSEC modeling showed that there were areas of high risk in the Upper Amman and Upper Swansea valley that were predicted to be outside of 10 minutes from a station. When the Service Standards for fires in the home were considered it was highlighted that the risk in these areas should be addressed. The 10 minute calculation includes an allowance for the time taken for an appliance to leave the station from the time it is alerted as well as the traveling time to the incident, a factor which may not have been fully considered by some respondents. The area with the highest number of these dwellings was the Upper Amman Valley.

Incident analysis shows that there are some areas here where crews will reach within the standard, but on other occasions they may take longer. There are many locations that will not be reached within the standard, and more that are borderline cases. The proposal intended to provide a station in the area to ensure that as opposed to having to await a response from Pontardawe or Ammanford there would be a local attendance which would reduce the time taken to attend incidents in an area that had been identified as above average risk.

Members of staff in particular challenged the reports that these areas in the plan were outside of 10 minutes of a station and widely quoted incidents when they had reached within the area in less than 10 minutes. They argued that the provision of a station in this area was therefore unnecessary as long as Pontardawe remained whole-time crewed. These statements were again widely quoted and accepted and reported by many respondents whose main focus was the traveling time. The provision of a new station in this area would dramatically improve response times.

Respondent's area of concern	Fire and Rescue Authority's response	Response
The information provided by FSEC regarding areas 10 minutes from a station was challenged. Respondents stated that existing appliances could reach areas in the Upper Amman or/and Swansea Valley within 10 minutes.	The ten minutes attendance time includes the time taken for crews to turn out from station in addition to the traveling time of the appliance. There are areas of the Upper Amman Valley that Pontardawe and Ammanford can reach within (but close to) 10 minutes. There are however areas that cannot be reached within 10 minutes. The provision of a station in this area would remedy this in conjunction with community safety initiatives for other areas. An independent assessment of the FSEC model is being undertaken.	24
<i>This response was made by a large number of respondents mainly the staff, public, Assembly Members and most other respondent types</i>		
Concern that the changes will not meet the requirements of the WAG Service Standard?	The provision of the new station will improve the attendance times in the area of high risk in the Upper Amman Valley. The areas of high risk in the Upper Amman and Swansea valleys will also be targeted with community safety initiatives.	3
<i>Raised by Assembly Members and a Town and Community Council</i>		

Activity level of the Pontardawe appliance

The use of statistics within the plan and to support the proposal to change the crewing at Pontardawe were strongly challenged by some respondents. These challenges, made on the use of activity data is not accepted. The average number of incidents where appliances had attended both in their area and in other station areas was shown in the plan for all the appliances listed. This was considered appropriate as it reflected the risks attended by the appliances. Instances where appliances were sent to provide standby cover for other stations was considered but not included in the plan as this provision can be provided by other means and is the subject of a review. The same criteria was used for all the appliances reported upon.

Information quoted and circulated by staff was three years out of date and showed no comparison with the activity for other station appliances. This information was also for a different criteria and focused on each time the appliance was turned out from the station and for standby turnouts and not when the appliance actually attended an incident, so it was not possible to compare like with like.

If mobilisation figures for all the appliances under consideration had been used it would, of course have shown the same higher numbers. This data did not reflect the improvements in attendance strategy and the overall reduction in appliance attendances resulting from our prevention strategies that has occurred over the last three years.

This information though misleading was accepted by many and widely circulated and reported upon by many respondents including Assembly Members and elected members. Indeed some respondents believed that the figures in the plan had been provided to deliberately mislead on activity levels.

Respondent's area of concern	Fire and Rescue Authority's response	Response
<p>Statistics published in the plan were challenged. Respondents challenged the interpretation and the use of statistics and circulated their own comparisons</p>	<p>The data published in the plan was for incidents attended by the appliances under focus. This was appropriate as it demonstrated the activity of that appliance. Figures circulated by Station personnel were for a different criteria and were 3 years out of date.</p> <p>Calls where crews were called to stand by at other stations have not been considered as the arrangements for standby can otherwise be provided and are currently subject to a review.</p> <p>The profile of the station and the increased activity in the early evening will be considered as part of the implementation plan.</p>	<p>15</p>
<p><i>Statistics were challenged by a number of respondents mainly staff, representative body, elected members and the public.</i></p>		

7.1.5 Provision and maintenance of retained crews

The proposal would result in the establishment of a retained crew at Pontardawe and with the building of a new station in the Upper Amman Valley an entirely new retained fire fighting team. Respondents made comments on their concerns in these areas.

Respondent's area of concern	Fire and Rescue Authority's response	Response
There are problems with recruitment, retention, training and skill levels of Retained personnel	Retained recruitment and retention is recognised as a national issue. Retained crews are a skilled workforce who provide effective response in stations that cover the majority of our area. The Service does not envisage problems in recruiting staff in the area. A review into the provision of retained cover is ongoing.	15
<i>Raised by members of staff, Assembly Members, Representative body and elected members.</i>		

Retained appliances are sometimes unavailable due to the lack of availability of the retained crew.	Arrangements already exist to monitor the availability of retained crews. Additional appliances are sent if a call occurs during these times. Problems usually arise during the daytime and no changes are proposed during this time. The Authority does not envisage any problems. A review into the provision of retained cover is ongoing.	13
<i>Raised by members of staff, Representative body and the public.</i>		

7.1.6 Clarity of the proposal

A small number of respondents made comments that criticized the way in which the proposal had been presented and challenged the Authority's knowledge of the area in question. It was acknowledged that the names used may not have been how the area was referred to locally. There was however no confusion on where the areas of high risk were and what the Authority intended to achieve. The final plan will take account of the comments provided on area names.

As some briefings had been undertaken prior to the draft plan being published staff were aware that different options had been debated and were concerned that they had not been provided to the Member working group for consideration. The Member working group had considered a large number of options for reducing risk in this area but had elected to consult only on the option that they considered to provide the most benefit in terms of reducing risk and best use of resources.

Respondent's area of concern	Fire and Rescue Authority's response	Response
References in the plan imply that there is confusion between the Upper Amman and Upper Swansea Valleys	Some references to the area names in the document may have been unclear, but the location of the risk in the plan is correctly identified. Any references in the final plan will be relevant to the area.	5
<i>Raised by staff and Town and Community council member</i>		
Options debated prior to the consultation were not presented to Councillors. All options were therefore not given equal consideration	The Member working group considered the options available. The option consulted upon was selected following extensive consideration.	3
<i>Raised by staff, Representative body and elected member</i>		
Staff suggestions for Options have not been considered	Proposals made by crews from Pontardawe to provide a new Whole time fire station at different locations were mapped on FSEC and it was found that they did not provide the best option for risk reduction.	2
<i>Raised by representative body and member of fire service</i>		
Information from the FSEC model shows increase in risk for all options considered, which contradicts the statement in the plan	The information provided by FSEC forms only part of the methodology for monitoring risk. Community safety initiatives and activities has an impact on risk and this together with professional judgment is a significant factor in informing the strategy.	5
<i>Raised by staff and member of the public</i>		

7.1.7 Business Case and Deliverability of Proposal

In order to provide indicative costs for the options considered a great deal of work was taken to predict the additional costs of recruiting, training and supporting retained crews, and to estimate the number of incidents that the new station would be expected to attend. Information on the availability and acquisition of land on which to establish a Community fire station was estimated and included in the calculations for indicative costs. It was felt that to seek and obtain a site and to provide a detailed plan prior to the consultation would have appeared to pre-empt the results of the consultation.

The scale of the project to implement this proposal has not been under estimated and it is acknowledged that a great deal of time and effort and investment would be required to bring to fruition the Authority's vision of a Community resource in the Upper Amman Valley.

Respondent's area of concern	Fire and Rescue Authority's response	Response
Reservations regarding the business case, implementation and practicality of the proposal	Indicative costs have been prepared for the option. A detailed plan to cover all aspects of the project will be undertaken. Developing a detailed plan prior to the consultation may have appeared to pre-empt the results of consultation.	6
<i>Raised by Assembly Members, representative body and town and community council members</i>		
No feasibility study was undertaken to recruit potential fire fighters or to ensure that existing whole-time crews can provide night time cover.	Undertaking a feasibility study prior to consultation may have appeared to pre-empt the results of consultation. Recruitment will be targeted at the relevant communities.	4
<i>Raised by staff and town and community council member</i>		

Activity in the Upper Amman Valley area will not sustain a retained fire station.	Projected incident activity for this area has been calculated using historic data and has been estimated at approximately 200 incidents per annum. Community safety initiatives are targeted at reducing this number. This is appropriate for a retained station.	1
<i>Raised by member of the public</i>		
Sharing a site in the Upper Amman Valley area with Police is unrealistic as the Police recently moved in to a new station in Ammanford. Sharing a site in Upper Amman Valley area with the Ambulance is unrealistic as an ambulance station at Glanamman was closed several years ago.	No formal agreement has been made with the other emergency services on site sharing. This proposal would however provide an opportunity for partnership working between all services and potential partners in the area and enable a shared site to be used for Community use. This is an area that the Welsh Assembly Government is keen to promote.	1
<i>Raised by elected member of Neath & Port Talbot Council for Lower Brynamman.</i>		
Pontardawe crews undertake on average 1,000 HFSA a year. Day crewing would reduce this number as no audits would be undertaken in the evening.	Resources will be redirected to undertake HFSA's. Dedicated community safety can target high risk premises and undertake a higher number of audits at a time that best suit the community.	9
<i>Raised by staff and representative body</i>		
The release of 14 personnel from Pontardawe would filter into other operational posts and to fill deficiencies and not for community safety duties	The resource associated with the 14 posts will be used to provide for areas of higher priority. The provision of whole- time cover for Pontardawe has been identified as an over provision.	2
<i>Raised by staff</i>		

7.1.8 Financial Considerations

Indicative costs were provided to show how the approximate establishment costs and the approximate annual sum released for other priorities. Challenges were made on the resources released and the overall reduction in risk against the perceived increase in risk for the Pontardawe area. The local Assembly Members felt that the cost of the proposal would be prohibitive. The Authority had considered that the project would require a significant investment but that on balance this was a better use of their resources.

Respondent's area of concern	Fire and Rescue Authority's response	Response
The amount released for redirection by the proposal is not worth the increase in life risk.	The redirection of the resource will be directed towards the areas the Authority considers to have the greatest risk in order to reduce risk in the Service area.	6
<i>Raised by staff, representative body and member of town and community council</i>		

The approximate amount released annually would be reduced by the increase in payments to retained crews for standby	The costs provided for the option are indicative. Standby arrangements are being reviewed to ensure that the necessary level of cover is maintained. The costs of maintaining Pontardawe as a whole-time crewed station far outweigh any costs to support a retained crew.	2
<i>Raised by staff</i>		
The proposal is motivated by savings	The proposal makes no financial savings at all. Resources released will be re-invested to other priority areas The Authority has an obligation to use its resources to reduce risk in the most effective way. Resources released will be used in the areas of greatest need.	3
<i>Raised by staff and representative body</i>		
The Capital and Revenue costs of the proposal would be prohibitive	The initial costs for establishment are significant. The Authority has considered this and feels that they are prepared to make this investment to improve risk. Capital and revenue costs will be built into the budget and have been included in the calculations.	2
<i>Raised by Assembly Members</i>		

7.1.9 Other responses

The proposal generated a number of other comments that are summarised below.

Respondent's area of concern	Fire and Rescue Authority's response	Response
Pontardawe should be attending areas now covered by other stations as they get there faster. Cover arrangements have been changed in recent years to strengthen the case for day crewing.	This is a common perception by station personnel who dispute boundaries with neighbouring station grounds. It is always intended that the nearest appliance should attend incidents. Any requests to change attendances will be processed through the proper channels and evaluated in order to provide the nearest attendance. Improvements in the mobilising system will contribute to the selection of the nearest appliance for each incident.	3
<i>Raised by representative body, staff and town and community councils</i>		
Some responses were received stating that they rejected the proposal but no reasons were provided. A petition with over 5,000 signatures from local residents was forwarded by a local Assembly Member opposing the proposal to 'downgrade Pontardawe Fire Station' A petition was established on the '10 Downing Street' website opposing the 'downgrading and closure of Pontardawe Fire Station'	The Authority is unable to respond where no specific reasons for objections have been raised. However the weight of response for these submissions will be considered. The '10 Downing Street' petition refers to the 'closure' of Pontardawe Fire Station and as such is misleading and will not be considered.	8 And 2 petitions
<i>Raised by members of the public, staff, Assembly members, and town and community council members</i>		

7.1.10 Response Analysis

All the responses were analysed and it was found that the professional argument was sound and no new evidence was presented to the Authority, though it was clear that some of the messages the Authority had been keen to communicate had been distorted. Despite the efforts of the Authority to present the facts and promote the benefits that would arise from the proposal there is overwhelming opposition to the plan from the public, staff, and elected members at all levels. Responses were received from 131 individuals or organisations, the population of Mid & West Wales is almost 900,000. This is still a comparatively small number of responses when considering the large number of stakeholders consulted with.

The opposition to the changes at Pontardawe were anticipated but more disappointing was the lack of support for the creation of a new Community resource in the Upper Amman Valley, particularly from the residents and representatives of this area. The Retained Firefighters Union made positive comments on the provision of a community resource and the benefits it would bring to the community. Betws Community Council supported the provision of a new station but strongly disagreed to relocating the appliance from Ammanford to provide for this facility.

The local authority elected members for the Upper Amman Valley provided detailed responses rejecting the proposal and two of the agencies representing communities in the area, the Amman Community Network and the Communities First for the Upper Amman Valley all opposed any option that would either relocate the appliance from Ammanford or remove the 24 hour whole-time crewing for Pontardawe.

The proposal also generated opposition from the local Unitary Authority of Neath & Port Talbot, Assembly Members both locally and from a wider area and from Town and Community Council representatives also opposed the proposal. The Fire Brigades Union also provided a lengthy document detailing their objections to the proposal.

The implementation of the proposal will take considerable time and effort on the part of the Service and may continue to generate opposition from the people of this area and their political representatives both locally and nationally. The political impact on adopting the proposal has taken into consideration that politicians, staff and members of the public who took the trouble to respond, have shown their opposition to the plan.

The Authority has carefully considered all the information provided as part of the consultation process as well as the profile of the respondents. Despite the strong opposition to the proposal the Authority are satisfied that they have not been provided with any new evidence to change their original views. The areas of concern were analysed in detail and it was found that all the issues raised had been taken in to account by the Authority in reaching their original proposals and appropriate responses have been made in this report on these concerns.

7.2 Proposal 2 – Duty Systems on our whole time crewed stations.

The Authority wished to make changes to the current duty shift system to provide the best use of resources and wanted to know what was important to staff in order to inform any changes.

The limitations of the current shift duty system are recognised, appliances often operate with less than normal crewing and this is not what the Authority requires for firefighter safety. There are also occasions where there are more staff on duty than required due to the way the current system operates. Different shift systems are operated elsewhere in the country and a consultancy firm has worked with officers to provide advice on ongoing national studies and what can be achieved by making changes to our current system.

Rather than presume that we know what is important to staff it was considered that before further work was undertaken it was appropriate to ask staff for their opinions. The proposal was consulted upon in the draft Action Plan with some information provided on why we felt we need to undertake this study and what we wanted to achieve.

It was made clear that no decision had been made on a duty system and that no changes would be made without there being significant benefits to public and staff safety by doing so. The benefits required of a new system are:-

- Increase crewing levels to improve firefighter safety with an aim of achieving a 100% level at all times
- Make more efficient use of resources
- Reduced under-utilisation of staff time during “quiet” periods
- Minimise staff absence
- Increase the capacity for training off watch
- Provide staff with predictability of holidays
- Provide the correct number of staff needed at all times and Increase flexibility

Responses to the proposal

Comments were invited on what was required of a new duty system and the impact it would have on staff. Some comments were made in general support of the proposal mainly from Town and Community Councils but with some conditions, these comments are reported below.

Respondents Comments on Approach	Respondent type	Response
Changes should be justified through robust analysis and clear evidence.	Town and Community Council	1
A review of the duty system is good management practice. This will allow for greater flexibility whilst maintaining professional standards and less wastage.	Town and Community Council	5
Service delivery, type of crewing, response times and weight of attendance should not be affected.	Industry/Commerce Health Authority Town and Community Council	21
Staff and representative bodies should be consulted with and involved in the work.	Members of staff Town and Community Council	4
Support and flexibility should be available to assist staff conditioned to the new system.	Member of staff	1
Any changes should benefit all parties	Members of staff	3
General support	Town and Community Council	1

These comments are appropriate and are considered to be beneficial in informing the work of the project to make changes to the existing system.

7.2.1 Negative Responses

Predictably the majority of comments were from staff, who had strong opinions on what was important to them. Many negative responses were received raising concerns in the following areas along with the Authority's response or comment:-

Negative responses	Fire and Rescue Authority's response	Response
An examination of the Duty System is not necessary	The Authority does not agree. The existing system can be improved upon and more effective use of resources and a better provision can be achieved as outlined above.	15
<i>Raised by staff, representative body, Town and Community Council and member of the public</i>		
There is insufficient information available on the proposal	The proposal does not provide an example duty system as none has been agreed. A number of different systems have been examined and consultants have provided advice on what could be achieved. The intention of the consultation is to gather information to develop the best system.	9
<i>Mainly raised by staff</i>		
Change motivated by savings.	The intention is to use resources more efficiently to achieve the benefits outlined in the plan	4
<i>Raised by staff</i>		
Consultants do not understand station routines; staff are best placed to inform this process.	The Consultants employed will work with staff to take account of the comments made as part of this process. They have worked with many Fire & Rescue Services, as well as other organizations and are well versed in operational and station routines and can provide advice on the advantages and disadvantages of other duty systems. It is intended that a working group be established to progress the project. The representative bodies will be involved in the ongoing negotiations.	5
<i>Raised by staff and representative body</i>		
Reduction in numbers on duty would impact on crewing of special appliances	Standard crewing is recommended for primary appliances, primary crewed special appliances will also have a crew. Other special appliances will be crewed in the same way as they are now.	2
<i>Raised by staff</i>		

7.2.2 What staff want from a duty system

From the responses received, staff were clear on what they wanted to maintain and it became apparent that there were some significant issues for staff when considering what was important in a duty system.

What staff want from a duty system	Fire and Rescue Authority's response	Response
Staff like the 4 on 4 off system Other services are adopting this system because of its benefits	This is the shift pattern that is currently worked. This is an effective shift pattern and no evidence has been provided to suggest that this pattern should not be retained.	25
<i>There was overwhelming support the maintenance of this system, mainly from staff and representative body</i>		
A system that is family friendly and allows for flexible arrangements	Staff consider that the existing system is family friendly and flexible. This will be a consideration for the new duty system.	23
<i>Mainly raised by staff</i>		
Routines on the station have been adapted to meet the Service objectives. Community safety duties are undertaken during the day and early evening. Training is carried out during the night shift.	The ability to undertake Community safety duties is an important consideration. Any new system would support the existing on watch training arrangements and provide a framework for improved off watch training.	9
<i>Raised by staff and representative body.</i>		
Annual leave can be predicted and booked in advance and there is flexibility for changes.	This will be a consideration for the new duty system. Arrangements for changing leave will be examined.	6
<i>Raised by staff</i>		
Off duty time should allow sufficient rest between shifts	Agreed.	1
<i>Raised by staff</i>		
The existing shift system allows for a close working relationships that provide support during serious incidents	This will be considered as part of the ongoing project	1
<i>Member of staff</i>		
Start time of night shift could be reviewed. Current change over is a good time to undertake Community Safety duties. More productive work could be undertaken during the night shift.	Start time of whole-time shift times will only be considered if there is sufficient evidence and support to show any benefits.	2
<i>Raised by an anonymous respondent and a member of staff</i>		

The Authority is disappointed that more staff did not take the opportunity to respond to the proposal, but are very grateful to the staff who have taken the time to provide their comments. The responses received and suggestions made have been invaluable in providing confirmation on what staff and the community want from a duty system. Concerns on how any changes should be implemented and the need to provide efficiencies but not affect the operational capacity have been noted and will be used to inform the process. No comments have been made that provide evidence to contradict the main objectives of the proposal. The comments made during consultation will shape and inform the next stage of the development process.

8.0 Conclusions

The Authority received some positive comments regarding its shift towards prevention and education and its achievements over the previous year in reducing risk which particular emphasis on the reduction in accidental dwelling fires. These comments endorse the strategy that the Authority has assumed in attempting to improve community safety.

8.1 Risk Reduction Options for the upper Swansea and Amman Valley Areas

In terms of the Authority's intervention proposals there were some areas of general support for the improvements planned in community safety and the provision of a new fire station. It is fair to say that most reservations for this proposal were expressed on the issue of the changes to the crewing arrangements at Pontardawe. Many felt this to be an unjustifiable spreading of resources that would adversely impact upon service delivery and lead to an unacceptable increase in response time. The strongest opposition came from the Communities and staff directly affected and the elected members that represented them both at a local and national level.

The strength of the response and the emotions generated in opposition to the proposal at all levels was significant. Comments to oppose the proposal were received from all the stakeholder groups and at all levels. Members of Parliament and Assembly Members who responded to the consultation made comments to oppose the proposal. Some of the Assembly Members notably the member for Neath and the former Minister for Social Justice and Regeneration provided lengthy and detailed responses outlining their concerns. The Assembly Member for Neath also forwarded a 5,000 plus signature petition completed by local residents opposing the changes to crewing at Pontardawe.

Neath and Port Talbot Council in their formal response to the consultation whilst impressed with the community safety achievements of the Authority voiced their strong opposition to changing the crewing at Pontardawe, despite the provision of a briefing on the proposals. There was also opposition from the local authority members for the Upper Amman Valley and the 'Communities First' organisation for this area as well as generally from Town and Community councils.

There was a notable lack of response or support from the communities in the Upper Amman Valley where the new station was proposed. It was anticipated that residents in this area would welcome the proposal but they did not formally respond to the consultation.

The highest number of responses were received from members of staff and the vast majority of these respondents opposed the proposal strongly. The staff at Pontardawe undertook a co-ordinated and sustained campaign to generate support for maintaining the existing crewing structure.

The Fire Brigades Union provided a report in response to the consultation and predictably were vehemently opposed to the proposals mainly due to the increase in response times, their belief that the Pontardawe appliance could reach the high risk areas in the Upper Amman Valley and the removal of an appliance from Ammanford. The Retained Firefighters Union in their response welcomed the provision of a new retained fire station in the Upper Amman Valley.

It is acknowledged that areas of the business case to provide the changes outlined in the proposal have made using some indicative information and costs. As the proposal was subject to consultation and may not have gained approval, the use of indicative information where necessary to inform the process was felt appropriate. The Authority recognises that implementing the changes in the Upper Amman and Upper Swansea Valley will involve detailed project planning and this project planning will take account of areas identified by the Authority and confirmed as a result of the consultation process. The realisation of the changes will take time, effort and investment on the part of the Authority and will involve working with partners to maximize the benefits of the improvements.

The political response to the proposal has been the subject of considerable debate as most of the politicians, who have taken the time to respond, have shown their firm opposition to the plan, and may continue to do so. This opposition is echoed by staff and the public.

The Authority has carefully considered all the information provided as part of the consultation process and has also considered the profile of the respondents. Despite the strong opposition to the proposal the Authority are satisfied that they have not been provided with any new evidence to change their original views. The areas of concern were analysed in detail and it was found that all the issues raised had been taken in to account by the Authority in reaching their original proposals. Responses have been made in this report to the areas of concern.

As the professional argument for making these changes remains sound, the Authority feels that the appropriate course of action is to confirm the original proposal. The implementation of these changes is therefore valid and will commence in 2008/2009

8.2 Duty Systems on our whole time crewed stations.

The majority of responses from the proposal to change the duty system at shift stations were predictably received from members of staff and the comments submitted have provided valuable information on what is important to them from a duty system. Other responses were mainly provided by Town and Community Councils and the Fire Brigade Union.

The comments that were made in support of changing the duty system to achieve the objectives listed in the plan came mainly from Town and Community Councils who also recommended that there should be no reduction in the operational capability of the Service and that there should be effective consultation with staff.

Members of staff in their response indicated that there was insufficient information in the plan to enable them to comment fully on the proposal. The proposal had not provided an example duty system as none had been agreed. A number of different systems had been examined and consultants had provided advice on what could be achieved.

Many of the responses made by staff indicated that a change to the existing was not necessary but they also indicated as part of their response why they wanted to retain their existing system and stated other benefits they would wish to see. Analysis of the responses has provided confirmation that the current 4 on 4 off shift system is extremely important to staff and that they feel this system is family friendly, allows leave to be pre-programmed and accommodates their intervention and prevention activities

Action

Initial work undertaken on this proposal had identified that there were considerable benefits to be achieved by making changes to the shift duty system. No comments were made during consultation that provide evidence to contradict the main objectives of the proposal. The comments made during consultation will shape and inform the next stage of the development process.

The project to fully examine and implement the changes to the duty system will now progress. We will work with our consultants to further examine existing systems and to take advice and consult with staff and representative bodies on the way forward. A project plan will be established to provide a system that will meet the needs of the organisation and its staff as listed below:-

- A working group will be established
- Detailed proposals will be drawn up in conjunction with staff
- Focus groups will be arranged
- Negotiations will be undertaken with representative bodies
- A communication programme will be developed with staff directly affected