
Report To:	The Inverclyde Council	Date: 18 August 2011
Report By:	Corporate Director Regeneration & Environment	Report No: SL/LA/733/11
Contact Officer:	Sharon Lang	Contact No: 01475 712112
Subject:	“Protecting our Seas and Shores in the 21st Century” – Consultation on Revised Proposals	

1.0 PURPOSE

- 1.1 The purpose of this report is to advise the Council of revised proposals by the Maritime and Coastguard Agency (MCA) in relation to the future of the Coastguard Service and of submissions made by the Council to the MCA in this regard.

2.0 SUMMARY

- 2.1 The Council agreed unanimously on 24 February 2011 to support a motion expressing concern at the proposal by the MCA contained within the consultation document “Protecting our Seas and Shores in the 21st Century” to close the Clyde Maritime Rescue Coordination Centre at Greenock, supporting the campaign by the PCS Union Branch and Staff at Greenock to retain the Coordination Centre and calling upon the Maritime and Coastguard Agency to reconsider its proposals.
- 2.2 The MCA has now issued revised proposals within which is included a reaffirmation of the proposal to close the Clyde Coastguard Centre, resulting in the loss of over 30 jobs in Inverclyde, and also the possibility of the remaining jobs at the Agency’s Greenock base being relocated outside Inverclyde
- 2.3 A copy of the Council’s responses to both the initial and revised proposals by the MCA is attached as an appendix.

Min Ref
2011
Para 143

3.0 RECOMMENDATION

- 3.1 The Council is asked to give consideration to the above matter.

Sharon Lang
Legal & Democratic Services

John W Mundell
Chief Executive
Municipal Buildings
Clyde Square
Greenock
PA15 1LY

Tel: 01475 712701 Fax: 01475 712777
e-mail: chief.executive@inverclyde.gov.uk

29 July 2011

HM Coastguard Modernisation Consultation
Maritime and Coastguard Agency
Spring Place
105 Commercial Road
SOUTHAMPTON
SO15 1EG

Dear Sir

Protecting our Seas and Shores in the 21st Century Consultation on Revised Proposals

I thank you for your e-mail of 14 July 2011 inviting further consultation responses on modernising the Coastguard.

Instead of submitting an on-line response, I am writing this letter and enclosing a copy of your on-line consultation form duly completed as it is the Council's belief the format of the revised consultation pro forma fails to focus on the reasons for deciding which stations should remain. You are committed in terms of criteria Nos 3 and 4 of your own consultation criteria to (a) clarify the scope and the expected costs and benefits of the proposal and (b) ensure the overall accessibility of the consultation exercise. The revised consultation document and your restricted Questions 1 to 4 do not meet these standards.

Firstly, the expected costs and benefits of the revised proposals are not transparent in relation to the choices for retention. Although the Internal Review Team has made findings on certain perceived themes, there is no explicit analysis or reference to documentation or financial appraisal of the relative business cases for the stations proposed for closure or retention. This is most markedly noted in relation to the stations proposed for closure at Clyde, Forth, Yarmouth, Thames, Solent, Portland, Brixham, Swansea and Liverpool. Indeed, given the vital importance of understanding the rationale for such revised proposals, it is disappointing to see that the only referenced reason for closure of these stations is outwith the consultation document itself and is contained within Consultation Q & A No 4 which refers to the (unknown) criteria to be "used when deciding which station should go and which should remain". The answer to the Consultation Q & A says that "there is generally no operational reason to choose either one of any pair. The choice has therefore been dictated by practical considerations such as the potential site reinstatement costs if we were to close a station". There is no exposure or discussion of these "practical reasons". Furthermore, the only reference within the Consultation Document to the Clyde station in that regard is within page 12 where it is stated in relation to separate issues affecting Belfast/ Liverpool that "...Belfast currently provides operational cover for the station at Clyde and retaining a centre at Belfast will ensure that the local knowledge held within the pair is retained for the future".

If the above is the reason for such a significant choice, the reasoning and complete rationale including financial appraisal and comparative business cases, should be made available as part of the consultation process. For example, there could be many issues affecting Inverclyde and its location which could have weight in relation to any such assessments. An options appraisal of relevant factors would have to take place with a greater understanding of the property costs, relocation costs, site reinstatement costs (if any) and net impact on the affected area.

It seems this type of appraisal is lacking from your assessment process. It is not possible to validate a choice if this information is not readily transparent and assessed against other options.

Given the importance of the issues involved and your wishes for thorough consultation, it is essential to have a far greater understanding of the business cases for each retention/closure. The reason for Inverclyde's special concern in relation to this matter is explained in detail within my original letter of 28 April 2011 and the Council continues, in the above circumstances, to refer to those issues in relation to the revised consultation. In relation to the multi-partner regeneration activity which is underway within Inverclyde and the particular, adverse effect on jobs and employment which will arise from closure, it is essential to have a clear understanding of the reasons for any decision. The Government, partner agencies and the Urban Regeneration Company all have a very strong focus on the regeneration and employment issues within Inverclyde and the proposed closure of the Greenock station militates against the strong trends and actions and investments which have already been put in place. The lack both of a clear rationale and financial assessment for the choice makes it very difficult to understand the reason for closure on the Clyde. The consultation exercise could both be accessible to and targeted at those whom the exercise is intended to reach and the lack of relevant information means this objective is not achieved.

Secondly, in operational terms, it is understood there has been an assessment of the various themes of the consultation exercise by the Internal Review Team. The operational demands on the Clyde and its busy approaches and extensive coastline make it an important and vital coastguard watch. On the substantive issues of use and demand for services, the Clyde must be a strong and viable contender for retention. My Council's previous letter of consultation outlines its understanding of the industrial hinterland with its the extensive maritime use, passenger and freight transportation and the developing leisure uses within the region and seeks for those reasons to substantiate the significant strengths for Clyde's retention.

It is very much the Council's wish that you note the original representations and these further representations in support for further scrutiny of the continuation of the Clyde service. The Council acknowledges the pressures on all available resources but emphasises the two main themes of its continued response to you in respect of the (1) continuation and strengthening of the quality of service and safety provided by the MCA at the Clyde and West of Scotland and (2) joint efforts shared and undertaken by its partners in the ongoing process of area regeneration, with a desire to ensure the continuation of crucial, high quality jobs within this area.

It would assist if you could kindly acknowledge receipt of this consultation. I am happy to clarify any issue above that may be necessary.

Yours faithfully

John W Mundell
Chief Executive

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Information about you

Completion of this section is mandatory as it helps with our analysis of results. A note at the end of this form explains that we may be obliged to release this information if asked to do so.

* **Name:**

John Mundell

* **Address:**

Chief Executive
Inverclyde Council
Municipal Buildings
Clyde Square, Greenock

* **Postcode:**

PA15 1LS

* **email:**

gerard.malone@inverclyde.gov.uk

Company name or Organisation (if applicable):

Inverclyde Council

* **Which statement best describes you, your company or organisation?**

- Small to Medium Enterprise (up to 50 employees)
- Large Company
- Representative Organisation
- Trade Union
- Interest Group
- Local Government
- Central Government
- Other Emergency Service (Police/Fire/Ambulance)
- Member of MCA Staff
- Member of Coastguard Rescue Service team
- Member of the public
- Other, please specify:

If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?

Local Authority

If you would like your response or personal details to be treated confidentially please explain why:

N/A

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Your Responses

Question 1

Do you agree that retaining 24/7 sub-centres at both Shetland and Stornoway adequately addresses the concerns expressed? Do you think that there is a more cost effective way of addressing these concerns?

Please see attached letter

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Question 2

Do you agree that retaining the 24/7 sub-centre at Holyhead rather than the station at Liverpool with which Holyhead is currently paired best addresses the concerns expressed in consultation?

Please see attached letter

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Question 3

Does the new structure as described provide appropriate resilience to cover the UK coastguard operational needs?

Please see attached letter

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Question 4

In proposing the retention of Milford Haven rather than Swansea, are there any other factors that need to be addressed?

Please see attached letter

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If you have any further comments, please write them here:

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4 May 2011

HM Coastguard Modernisation Consultation
Maritime and Coastguard Agency
Spring Place
105 Commercial Road
SOUTHAMPTON
SO15 1EG

John W Mundell
Chief Executive
Municipal Buildings
Clyde Square
Greenock
PA15 1LY
Tel: 01475 712701 Fax: 01475 712777
e-mail: chief.executive@inverclyde.gov.uk

Dear Sir,

**Protecting our Seas and Shores in the 21st Century
Consultation on Proposals for Modernising the Coastguard 2010**

I am writing on behalf of the Council to respond to your consultation process, as above.

As requested, I am also returning your consultation response form duly completed with the mandatory information. The Council, however, prefers to respond to the consultation document by this letter as the questions in the remaining pro-forma response document require a broader response from the Council's perspective on this vital matter. Accordingly, please treat this letter as the Council's formal response document.

Inverclyde Council has confirmed that it is very seriously concerned at the proposal by the Maritime and Coastguard Agency as contained within the consultation document to close the Clyde Maritime Rescue Co-ordination Centre at Greenock and which would result in the loss of up to 35 frontline operational coastguard posts. The Council believes these cuts to an essential frontline emergency service will put the lives of Inverclyde residents and all those using the seas off the West Coast of Scotland at risk; that the proposals within the consultation document rely too heavily on new technology that has not yet been developed or tested; and, that replacing years of local knowledge by systems is fundamentally wrong. The Council believes the proposals will cause inherent delays in the emergency response with consequences for the dispatch of rescue helicopters and RNLi lifeboats to people in trouble on the seas and increase the risk to life and property.

The Council has two fundamental issues of concern. First and foremost is the continuation and strengthening of the quality of service provided by the Maritime and Coastguard Agency for the Clyde, West of Scotland and North Atlantic. Secondly, the Council is committed to a process of area regeneration and has obtained substantial support from the Government and other agencies in the transformation and regeneration of Inverclyde: the loss of crucial, high quality jobs from this area has a detrimental impact on Inverclyde as a location with consequential negative impacts on its population.

As you know, MRCC Clyde has a very extensive and varied operational area from the Mull of Galloway to Ardnamurchan Point with one of the longest coastlines of any coastguard watch and provides back up resilience as and when required to Belfast.

There is a significant risk of the widest range of emergency incidents and it is the busiest search and rescue station in Scotland and the fifth busiest in the UK. The operational area is diverse and complex and is contained within an area with 50% of Scotland's population and this is just as relevant for issues of commerce and industry as leisure sailing and diving and other developing recreational pursuits. The area is supported by extremely good transport links between Greenock and the conurbation of Glasgow with road, rail and air transport links easily accessible to all. There are significant ferry routes serving the West of Scotland area with vital links between population centres and also major ferry routes between Scotland and Northern Ireland. Greenock Ocean Terminal is hosting a significantly increasing number of cruise liner visits and the operational area includes Clydeport Harbours at Glasgow, Greenock, Hunterston and Ardrossan with millions of tonnes of cargo being handled annually.

There is a substantial industrial infrastructure with developing and increasing roles for recreation and leisure use. The sea and its adjacent coastal area play a huge part in this region's diversity and attractiveness to residents and visitors.

The MRCC Clyde plays such an important role in existing and developing industry, trade and leisure that the Council cannot support proposals which may lead to a reduction in priority or a diminution of quality of service. The available statistics reveal the large number and diverse nature of incidents dealt with in the existing operational area and a continued focus on the Clyde and West of Scotland area is vital.

In supporting the evidence for retaining Greenock's Coastguard Centre, it is clear that its strength is in its existing experience and capacity and this is evidenced by the fact that the local facility spends more hours on search and rescue than any other station in Scotland. The Greenock Centre ranks fifth in the UK for the number of incidents handled with Aberdeen, for example, in tenth position. Furthermore, it may be these incidents are more problematic and complicated than other areas. Greenock Centre deals with 41 search and rescue teams, putting it in top place with Stornoway. The local centre at Greenock has lower running costs than that of Aberdeen. The proposed closure of the Greenock Centre would result in a weakness in the Coastguard structure through the loss of 35 personnel with substantial and important local knowledge, experience and professionalism.

Under the current proposals, the Council is concerned because we believe that maritime safety will be compromised and risks increased. The Greenock Centre covers the extensive sea area noted above and also comprises the Clyde Estuary and the Islands including Arran, Bute and Cumbrae. Within the proposals document, the West of Scotland and Clyde seaways would be looked after by sub-centres at Belfast or Liverpool, or Stornoway or Shetland: Given that our area's waterways are busy and can be unsafe, the Council firmly believes that Greenock is an ideal location for a coastguard service base. It is geographically situated in the middle of the West Coast and its approaches and is near to Faslane and Clyde Container Terminal.

The value and importance of local presence and knowledge cannot be disputed. If proposals require the increased reliance on the network of local volunteer teams, these must be managed effectively and good local knowledge and presence will be crucial in managing incidents and sharing communications with search and rescue teams.

There is no evidence to show that the use of untried modern technologies will in themselves produce an integrated network that can respond quickly in emergency situations. The risks, particularly the technological risks that are involved in increased networking and geographically remote sites, require to be assessed and documented in order to address the impact of problems or failure in managing emergency response. To ensure resilience and to provide a more resilient response for future needs, it is essential that the service be proficient in local knowledge and continues to be properly trained and equipped for local and potentially complex rescue situations.

The Council can accept the need for review and the wish for modernisation. However, the proposed closure of the Greenock Centre must be considered against the increased risk to the safety at sea of the coastal mariner and the recreational boating community. There is insufficient evidence to support the closure and the management of emergency response through modern technologies from distant locations. Instead, the volume and nature and extent of incidents show that the Clyde and its approaches are exceptionally busy and require a dedicated and locally-based resource. Indeed, this Council and our Partners in our quest to dramatically increase our visitor economy and in turn the economic vitality of our area, are in the process of creating facilities for significant increases in leisure craft use with new marinas at East India and Victoria Harbours, James Watt Dock, the Great Harbour in Greenock and others.

The Council recognises the impact of available resources and budgets. A revision of the emergency response cannot be determined by any single criterion such as relocation costs. It is understood that a comparison of available floor space and facilities costs has to be made. This Council would be pleased to assist in any feasible way with suitable lease covenants for competitive market rates for any available property within its portfolio or the portfolios of its partners. It is understood that the existing floor space at HMS Dalriada is more extensive than current need; equally, it is also understood that the costs of relocation in Aberdeen may involve higher property premiums and possibly less available tenure in the duration of property leases. There appears to be no operational basis for this decision other than being financially locked into a much more expensive property lease in Aberdeen. Morally this is entirely inappropriate justification for the current proposed operational solution as part of the long term future of the MCA.

The Council would assist insofar as possible in relation to any alternative accommodation and financial packages required for a continuation within the West of Scotland. This is entirely within the Council's existing priorities for supporting and securing employment within Inverclyde. This again raises the important issue of resilience: at present, there is a potentially accessible and skilled workforce available to assist the Maritime and Coastguard Agency with the recruitment of high quality candidates for the future as a result of well qualified naval personnel being based within the area at Faslane and Coulpport.

The Council is not convinced that the breadth and nature of the emergency response can be adequately managed without the Greenock Centre and for that reason it would at the absolute least, support an incremental approach to the implementation of your modernisation programme which would result in the retention of the Greenock Centre for Clyde and West of Scotland operations. In the Council's opinion, the removal of the service from Greenock is not supported by robust evidence, and would have adverse implications for the quality of service and for jobs in the local area. An incremental step in the review – with the continuation of Greenock being secured for the future – would provide the focus on the operational area that is deserved and, in itself, support the Agency's drive for savings and modernisation and ensure continuing resilience of service. This would also allow the MCA to test and prove your new technology and in so doing, build trust and confidence to those who depend on your services. Withdrawal of the Greenock Centre is not seen as a viable or productive option within the terms of the consultation document and there are strong arguments for the merits of continuing and improving the Greenock centre on both a quality of service basis and local impact on jobs and more importantly to ensure appropriate resilience of service.

It is the Council's conclusion that the Greenock Centre should be retained. The Council's main concern is that the coastguard services currently being delivered, including maritime safety information and search and rescue, be continued at the same level and develop in the future within our area given the maritime, industrial and increasing recreational and leisure use. The Council argues strongly for the retention of the Greenock Centre not just on the grounds of quality of service and resilience but on economic grounds. Inverclyde has a higher unemployment rate than Aberdeen and has one of the fastest declining populations in Scotland.

Accordingly, the Council would very much wish to see these jobs remain within the local area rather than transfer to another area (which is an area of low unemployment). The importance of local knowledge and professionalism as held by the current workforce must not be underestimated. Any revision of the existing service must take into account the need to maintain and enhance a safety culture that meets the needs and demands of the local operational area.

This Council understands the need for efficiency and effectiveness in service delivery especially in the current economic climate and acknowledges the MCA's need to deliver financial savings of the order of £7.5million nationally. Nevertheless, this Council is committed to finding a mutually beneficial solution that will ensure the safety, robustness and the resilience of the coastguard service, assist in the delivery of your efficiency requirements and associated savings whilst also retaining jobs locally within Inverclyde.

I would be pleased to clarify or expand on any issue that is required and would be willing to work in an open and transparent manner with you to prepare a detailed business case as a viable alternative to current proposals.

Please acknowledge receipt of this consultation response.

Yours faithfully

John W Mundell
Chief Executive

Consultation Response Form

PART 1 – Information about you

Completion of this section is mandatory as it helps with our analysis of results. A note at the end of this form explains that we may be obliged to release this information if asked to do so.

Name:	John W. Mundell
Address:	Inverclyde Council, Municipal Buildings, Clyde Square, Greenock
Postcode:	PA15 1LY
Email:	john.mundell@inverclyde.gov.uk
Company Name or Organisation (if applicable)	Inverclyde Council
Please tick one box from the list below that best describes you/ your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input checked="" type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Other Emergency Service (Police/Fire/Ambulance)
<input type="checkbox"/>	Member of MCA Staff
<input type="checkbox"/>	Member of a Coastguard Rescue Service team.
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?: Local Authority	
If you would like your response or personal details to be treated confidentially please explain why: No.	

PART 2 – Questions about the proposals

Question 1 (Chapter 1)

We have set out the changes that would affect the way the Coastguard needs to operate. Are there any other changes and pressures that should be taken into account in our plans for a modernised Coastguard service? Please provide supporting evidence for your comments.

Please see attached letter

Question 2 (Chapter 2)

We have explained the current Coastguard structure and the potential weakness in that structure in the face of increasing demand. Are there other strengths or weaknesses in the current arrangements that we should be taking into account? Please provide supporting reasons for your comments.

Please see attached letter

Question 3 (Chapter 3)

Under our proposals we would establish two Maritime Operations Centres handling emergency messages 24 hours a day, supported by a number of sub-centres operating at times of peak demand linked by a national network of radio connections and information sources. In your view, does this provide an appropriate and effective approach to Search and Rescue coordination response? Please provide supporting reasons for your comments.

Please see attached letter

Question 4 (Chapter 4)

Our proposals for Maritime Operations Centres and sub-centres locates these around the UK coastline and makes use of the MCA current estate. What is your opinion on the proposals for the location of these Centres and sub-centres? Please provide supporting reasons for your comments. Do you have particular comments or information about factors that should influence the choice of sites for sub-centres in either Belfast or Liverpool, or either Stornoway or Shetland?

Greenock should be fully considered for retention as described in the attached letter.

Question 5 (Chapter 4)

In your view, are the new roles and responsibilities for Coastguard officers at different levels in the proposed structure appropriate to the tasks that need to be delivered? Please provide supporting reasons for your comments.

Please see attached letter

Question 6 (Chapter 5)

Under these proposals the regular Coastguard working in Maritime Operations Centres and sub-centres will draw more heavily on the local knowledge of geography, community and coastal risk provided by the network of local volunteer HM Coastguard Rescue Teams and increased liaison with partner SAR organisations. Do you agree that this is the best way to ensure the availability of such knowledge. Please provide supporting reasons for your statement.

Please see attached letter

Question 7 (Chapter 5)

In your opinion, will the proposed strengthening of management for the Coastguard Rescue Service organisation, including the introduction of 24/7 on-call Coastal Safety Officers, provide a more resilient response service to those in need in UK coastal areas? Please provide supporting reasons for your comments.

Please see attached letter

Any further comments you may wish to make:

Please see attached letter

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.