

## REPORT OF HEAD OF RECREATION AND TOURISM

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**SUBJECT:**  
**HM COASTGUARD PROPOSALS FOR MODERNISATION CONSULTATION 2010**

Purpose of Report

To provide Members with an opportunity to contribute to the Authority's response to the consultation by the Maritime and Coastguard Agency on proposals to Modernise HM Coastguard and to agree the response.

Introduction/Background

The Maritime and Coastguard Agency have produced a consultation paper on a proposed reorganisation of Coastguard services in the UK which can be viewed at the link below.

The key issue for the National Park Authority is the proposed closure of the Maritime Rescue Coordination Centre at Milford Haven and the downgrading of the Swansea centre as part of a reduction of centres to two inter-linked Maritime Operations Centres near Southampton and at Aberdeen

The proposed response from the Authority is attached at Appendix A. Members are invited to comment on, and hopefully agree, the response.

**Recommendation**

**Members are requested to endorse the response.**

Background Documents

Consultation Paper at

[http://www.mcga.gov.uk/c4mca/mcga07-home/shipsandcargoes/consultations/mcga-currentconsultations/hm\\_coastguard\\_proposals\\_for\\_modernisation\\_consultation\\_2010.htm](http://www.mcga.gov.uk/c4mca/mcga07-home/shipsandcargoes/consultations/mcga-currentconsultations/hm_coastguard_proposals_for_modernisation_consultation_2010.htm)

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*Consultees:*

# 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.

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| Company Name or Organisation (if applicable) | Pembrokeshire Coast National Park Authority |

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|--|---|
| 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):                        |
| <p>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?:</p> <p><i>The Pembrokeshire Coast National Park Authority consists of 18 Members of whom 12 are nominated by Pembrokeshire County Council and 6 are appointed by Welsh Assembly Government.</i></p> <p><i>This response was agreed by the Authority at its meeting on 30<sup>th</sup> March 2011.</i></p> |   |
| If you would like your response or personal details to be treated confidentially please explain why:   |   |

## **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.

We agree with the document's projection of busier seas.

- The Port of Milford Haven is the 3rd largest port in the UK
- Shipping, ferry, cruise, transshipment of RE, increased inshore transport?
- Increased domestic holidays, trends towards more water access and recreation.
- Increased recognition of the importance of the waters off Pembrokeshire as of international importance to Nature Conservation. 3 Marine SACs, SPAs, Marine Nature Reserve
- Increased emphasis on coastal recreation and making the Coast Path more accessible increases the numbers within the remit of the Coastguard in the event of accidents.

## 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.

When the Sea Empress ran aground, it was of significant value to have a fully equipped marine control centre at Milford Haven together with locally based staff of sufficient seniority and experience to play a major role.

## 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.

The purposes of the National Park Authority centre on the conservation of the National Park and the coast of Pembrokeshire and the promotion of enjoyment and understanding of the special qualities of the Park. In pursuing these purposes we have a duty to foster socio-economic well being.

The coastal zone is the basis of and focus of both local residents' and visitors' experience of the Park and the MCA is a valued partner in our delivery of these roles.

Our main concerns for an effective Coastguard service centre on the following priorities;

- Environmental protection of the only coastal national park in the UK
- Protection of the seas around the coast of Pembrokeshire (including the southern Irish Sea and Bristol Channel), which contain three marine Special Areas of Conservation and marine/coastal Special Protection Areas– identified by the EU as of international conservation importance.
- The highly valued service of rescue and medical attention that the Coastguard provides on the cliffs, foreshore and the inshore waters around the coast of the National Park.

We contend that staff reductions and fewer stations will inevitably mean loss of local knowledge. Map-based information is no substitute for first-hand knowledge of an area, local conditions and working relationships. We believe that the proposals will inevitably increase response times and compromise operational effectiveness and efficiency.

The potential for confusion and misdirection from operators lacking local knowledge is compounded by the difficulty of many local place names, especially those in the Welsh language which will pose particular difficulties for operators based in England. Time and again accurate communication of local details has proved essential in rescue and pollution reporting and to be able to replicate this with operators covering the whole of the UK seems unlikely.

This is of particular concern in the waters off Milford Haven, given its status as one of the busiest UK ports, with crude shipments, LNG, ferry, fishing and recreational craft etc. operating in close

proximity. Within the port area there may be opportunities for the Port Authority to play a greater role, but their jurisdiction does not extend out to sea.

Around 14 million user days are spent in the county every year, with the Pembrokeshire Coast Path an ever-popular attraction, and increasing numbers of casual water users. For both of these user groups, the Coastguard provides a valued rescue and information service.

The document points out that there will still be local volunteer Rescue Teams and RNLI presences. However, dependent as they are on voluntary effort and donations there is no guarantee of these continuing at current levels in the prevailing economic climate.

In addition to being essential to routine search and rescues, Coastguard staff and resources are invaluable in larger contingencies, as evidenced during the Sea Empress incident. In particular, the significance of the loss of a well equipped and expertly staffed response centre should not be underestimated in a major emergency such as an oil spill, collision or ferry grounding. The presence of such a centre means that, in the event of an accident like the Sea Empress, there are fairly senior Coastguard staff with good knowledge of local operating conditions and established working relationships available in significant numbers.

While accepting that efficiencies may be possible, we feel that these cannot be allowed to compromise effectiveness where lives are at risk or internationally valued habitats may be threatened, but that this would be unavoidable if the proposal regarding Milford Haven is implemented.

Emergency response systems must include sufficient backup and redundancy, including multiple site presences. This reduces vulnerability and preserves the MCA's ability to cope with events/multiple events that may be infrequent but very high impact. There are also arguments against overreliance on technology, which can be susceptible to physical/cyber attack/electromagnetic vulnerability etc.

We suggest that, viewed in that light, the existing arrangements already represent minimum staffing, and urge the proposals regarding Milford Haven to be dropped, and the station and staff retained.

#### **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.

Suggest for the reasons given above that the proposed arrangements will be inadequate

**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.

**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.

**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.

No – it is hard to see how reducing the numbers of centres who take the calls can increase the resilience of the system in the eventuality of a failure of one of the communications centres.

Any further comments you may wish to make:

## **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.