

Response by Tor Bay Harbour Authority and Torbay Council to the Maritime and Coastguard Agency's Consultation on proposals for modernising the Coastguard

Tor Bay Harbour Authority and Torbay Council welcome the opportunity to respond to the MCA's consultation on the proposals to modernise the Coastguard. This is a joint response on behalf of Torbay Council as both a coastal local authority and a harbour authority. We would like to take this opportunity to thank the Coastguard for making our seas safe and saving lives by co-ordinating rescue operations in the most difficult sea conditions.

Our belief is that we cannot afford to be in a position where the UK is unable to deal with a future maritime incident with the potential to damage the coast in a manner similar to 'Erika', 'Prestige', 'Sea Empress' or 'Braer'. Incidents of this scale have a long lasting impact on the environment and in particular in Torbay, on our tourist economy. Equally, nothing being put forward in this consultation should be allowed to jeopardise the MCA's ability to respond to emergencies, co-ordinate rescue operations or prevent loss of life. The prevention of loss of life at sea should remain the top priority of the UK Government when considering any changes to the Coastguard.

We agree that modern technology should be fully exploited in order to provide a better Coastguard service. However, we do not accept that there should be any material reduction in the level of response, the nature of response or the assets available for preventing loss of life and co-ordinating rescue.

Q1. 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 acknowledge the changes that are affecting the way the Coastguard needs to operate. Although we support the proposals to exploit new equipment and technology in order to adapt to these changes and improve the response capabilities of the Coastguard, they must not come at the cost of a reduced level of service. We believe that it is inevitable that a reduction in MRCC numbers will lead to an inability to respond to an emergency or multiple emergencies simultaneously at the same level as the current service. A combination of the likely withdrawal of Emergency Towage Vessel (ETV) coverage and the possible ending of the Maritime Incident Response Group (MIRG) could well result in diminished response provisions. We believe that there must be firm arrangements in place to deal with emergencies that threaten lives or the environment. Any decision to remove these resources is likely to place an increased burden on the Coastguard when dealing with maritime incidents. We therefore believe that this potential reduction in the

external resources available to the Coastguard should also be taken into consideration when making the final decision on modernisation of the service. Recreational boating is increasing, and new ways of using the sea for leisure purposes are constantly being developed. This increase in boating needs to be incorporated into any planning process, and endeavours need to be made to get a more accurate evidence of the numbers and types and usage of all classes of leisure craft, from body boards to larger craft.

Q2. 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.

The proposals to develop a truly integrated national Coastguard system utilising up-to-date technology and equipment is generally supported. Currently the inability of all MRCCs to communicate effectively with each other and share workload is an obvious weakness in the system and any modernisation measures must clearly take this into account. However, we are seriously concerned that the closure of many regional MRCCs, including the Brixham station, will lead to a loss of the local knowledge possessed by Coastguard officers at these centres.

Q3. 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 idea to link all regional sub-centres via the establishment of multiple MOCs is generally supported. However, we are seriously concerned about the proposals to significantly reduce the total number of Coastguard stations handling emergency calls 24 hours a day. We accept that it is right to improve communications via the deployment of up-to-date technology but there is a very real danger that this will lead to a reduction in the 24 hour availability of both local knowledge and experience. It is proposed that sub-centres will be developed at the locations of some existing MRCCs in order to maintain a regional presence, but under the proposals some key locations, including Brixham, will be left without any kind of Coastguard communications centre. We cannot accept that the reduction in the physical number of Coastguard centres will not have any impact on the Coastguard's ability to handle calls. It therefore follows that the closure of the Brixham MRCC will jeopardise the MCA's ability to respond to emergencies, co-ordinate rescue operations or prevent loss of life in the Tor Bay area. It is our belief that adequate provisions should be maintained 24 hours a day rather than differentiating between peak and off-peak hours.

Q4. 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 and Shetland?

Please see our response in Question 3 above.

We obviously have serious concerns over the potential closure of the Brixham MRCC, with the Torbay and South Devon coastline being a very busy area with a diverse range of activities. Within this area we have the most significant fishing fleet in England, a major UK tourist destination, a deep sea pilotage station and historically an anchorage that provides a safe haven for shipping. We therefore recommend, as a matter of urgency, that the current proposal to close the Brixham MRCC is reconsidered and that the existing 24 hour coverage should remain.

Q5. 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.

Neither Tor Bay Harbour Authority nor Torbay Council is qualified to comment and therefore have no view on this topic.

Q6. 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.

It is our view that the knowledge provided by local volunteer HM Coastguard Rescue Teams is equally as important as that of the regional MRCCs and should continue to be relied upon, as indicated in the consultation document. However, as previously indicated, we believe the loss of regional MRCCs and their extensive local knowledge will be detrimental to the Coastguard's ability to respond quickly and effectively to incidents.

The local volunteer HM Coastguard Rescue Teams are defined as being land-based, and it is felt that whilst partner SAR organisation are to be a source of local knowledge, there are other communities who can also provide valuable input. e.g. local port & harbour authorities. Local knowledge is vested in individuals, not organisations.

Q7. 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.

Yes - we would certainly welcome the introduction of 24/7 on-call Coastal Safety Officers as they would strengthen the Coastguard as an organisation and provide for a more resilient response service along with the obvious benefit of local knowledge. An expansion of the ability to respond to land-based incidents is welcome.

Further Comments

Generally, we are supportive of the positive steps to modernise the Coastguard in terms of deploying the latest technologies to improve communications and emergency response effectiveness. However, we have serious concerns over the potential loss of regional 24-hour MRCCs.

We accept that linking regional sub-centres to centralised MOCs to potentially create a nationally integrated Coastguard system probably reflects modern best practice for a 21st century rescue organisation. However, we have significant doubts that the proposed system would be able to deal with an unexpectedly large number of incidents outside of peak hours. Furthermore we are concerned that when seconds count, any delay caused by a misunderstanding of local knowledge could lead to a loss of life.

The fishing and leisure boating communities rely heavily on weather and other safety information, and assurances are sought and that this will not be cancelled or reduced in efficiency because of the proposed new structure coping with casualty working. A most welcome development would be the automated transmission of weather and other safety information over a dedicated channel.

We believe that the decisions to possibly remove both ETV provision and the MIRG may also reduce confidence in the Coastguard's ability to deal with major incidents.

The proposed closure of Brixham Coastguard Station would mean that the areas around one of the UK's most important ports and tourist resorts is reliant on coastguards based at Falmouth and Southampton. This is expected to have a damaging effect on safety at sea and along the south Devon shoreline with a loss of crucial local knowledge. The closure will also result in the loss of about 24 jobs.

It has been resolved by Torbay Council that the Council supports the retention of Brixham Coastguard Station and its staff in the interests of safety at sea, and to support the fishing industry.

Torbay Council want to be clear in expressing its unanimous wish that other methods of reducing the Maritime and Coastguard Agency's budget are explored instead of closing the MRCC at Brixham.

