



HOUSE OF COMMONS

LONDON SW1A 0AA

29 September 2023

To whom it may concern,

I am writing in response to the North Wales Fire and Rescue Service (NWFRS) Emergency Cover Review consultation 2023. I am grateful to both Dawn Docx, Chief Fire Officer and Chief Executive, and representatives of the Fire Brigades Union (FBU) for their time in discussing the review with me.

In my role as MP for the Vale of Clwyd, I have considered the proposals from the point of view of the region as a whole, but particularly with a focus on the impact they may have on the Denbighshire area.

It is very positive that there were no deaths arising from accidental fires within dwellings in the region in 2022/23. I understand that the role of the service is slowly changing to take on new responsibilities, and a greater numbers of previously infrequent challenges. I support the desire to ensure that cover is more equitable and reflects the diverse needs of the region and, therefore, see the value of Options 1 and 2 from the perspective of introducing greater cover in south Denbighshire.

Nevertheless, I am naturally disappointed that all of the three options put forward within the consultation result in an impaired provision via the Rhyl station. While the achievement of 20 minute response times may remain unchanged within the Rhyl catchment area, that almost certainly obscures a deterioration in the 10 minute response time. The Rhyl station currently covers an area where the population continues to increase, along with many busy roads. It also deals with an increasing number of flooding incidents.

The Chief Fire Officer provided me with the following additional information relating to Rhyl on specific questioning:

“How many incidents in Rhyl require the attendance of more than one fire appliance?”

5-year averages:

- *Incidents requiring 1 appliance – 70%*
- *Incidents Requiring 2 appliances – 29%*
- *Incidents requiring 3+ appliances – 1%*

Rhyl’s duty system / response model:

Whilst Rhyl’s incident ground is the third busiest in North Wales, it is significantly quieter than Wrexham’s and it has very similar call volumes to those incident grounds served by the day crewing duty system in other areas of North Wales.

In 2021/22, Rhyl’s incident volume was only 16 incidents higher than Colwyn Bay’s and Colwyn Bay is served by half the number of Firefighters working a day crewing duty system. This is just over one extra call a month in comparison to Colwyn Bay and yet 14 more fulltime Firefighters serving Rhyl.”

It is clear that funding is a key driver for the options being discussed in the review and this is inevitable. Council tax increases present a difficulty for householders, especially during the

current economic climate. Nevertheless, I understand that for NWFRS, inflationary pressures combined with a desire to improve cover pose great challenges. Delivering a sustainable service is imperative and NWFRS will appreciate that, if my local taxpayer is being asked for increased contributions, this will be difficult to justify if the service being offered in the immediate area is to be inferior.

I am concerned that you state *“In the future, the Welsh Government’s aspiration is that we explore being able to assist our ambulance colleagues further by responding to cardiac arrests. To do all this we would need to be in the right place”*. It is not the Fire Service’s responsibility to compensate for the Welsh Government’s mismanagement of the Ambulance Service and NHS provision. It would be wrong for this consideration to influence decisions arising from the Emergency Cover Review.

The changes proposed in the review would result in a significant impact on some existing staff. Those crew members who do not live within five minutes of Rhyl station (whether travelling at 20mph or otherwise) would be required to find alternative accommodation for the nights that they are on duty. As I understand it, this would usually be in excess of 90 nights a year. Whilst I appreciate that there is an option to relocate staff who may live closer to Rhyl station but currently work out of area, no preferencing exercise has been undertaken as yet and therefore there are unknown impacts.

I believe that staff would be eligible for a payment which is intended to cover the cost of finding nearby accommodation for on-call duty. However, I am told this is not always adequate to meet hotel costs and many might need to sleep in a van on site. This would clearly have an impact on their quality of life and could result in fire fighters leaving the service.

It has been suggested by FBU representatives that the Fire and Rescue Service is currently top heavy as a result of financial resources allocated to fund middle management posts. It has been explained that currently two posts are vacant and that the service has arguably not been negatively affected by these vacancies. Whilst I cannot comment on this observation, I would ask that any inefficiencies within the current management and non-operational staffing structure are assessed before making significant changes to operational services.

The FBU have also identified 19 excess posts within the service which they consider can be re-allocated. It is clear that this claim needs full exploration.

Whilst I appreciate the review proposals would provide an upgrade in the current provision in Corwen to a day-staffed station, the FBU raised concerns that this option may have unintended consequences when taking into consideration the local politics and perceived “ownership” of the station. They felt that it may result in reduced loyalty and lack of interest from the local retained firefighters who currently manage this station and would still be relied upon for night cover.

FBU members also raised concerns that a greater reliance on retained staff may be unwise. They are troubled by a general decline in on-call firefighter availability due to societal changes. The potential impact of this must be considered in any plans brought forward. Additionally, as these staff have primary jobs, their availability is often reliant on their employer’s flexibility and goodwill. Over-reliance on such arrangements could diminish the support of employers.

When solely considering the Denbighshire area, the only significant difference between Options 1 and 2 appears to be the ‘Day Crewing’ and ‘Day Staffing’ of Rhyl station respectively. It is my understanding that the former involves daytime firefighters contracted for night cover from home whereas the latter relies upon retained staff at night. Based on the data kindly provided to me for the last five years, 39% of incidents in the Rhyl area occurred between 8pm and 8am. This constitutes a significant level of night-time demand and I feel that relying only on retained staff to cover the night shift for this area would be a risk.


It would appear to me that the specifics of any eventual agreed hours of duty of day crewing and day staffing would be critical to the overall impact of the arrangements.

In my opinion Option 3 is not a viable proposition. This option reduces the number of firefighters and involves a reduction in the areas reached, with 2,087 fewer households receiving a response within 20 minutes. Yet, this option would still cost the taxpayer an additional £12.22 a year.

I would highlight the fact that there is a need to consider the cover from neighbouring Fire and Rescue Services and vice versa. I believe that, when necessary, NWFRS can potentially expect a 20 minute response from Powey Lane, Chester and Ellesmere Port.

I would be grateful if you could take my observations into account and could carefully consider the FBU's counter proposals. I am told that, at the Initial Concept and Development Stage, public and employee representative bodies were not included to help shape and contribute to discussions. I believe it is imperative that an open dialogue takes place with the FBU and staff to ensure an amicable solution is found which delivers a safe and cost-effective service.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'J. Davies', with a long horizontal flourish extending to the right.

Dr James Davies MP