

Summary of Consultation Responses
on the Authority's IRMP Action Plan 2005/2006

<u>Subject Area</u>	<u>Number of Responses received during the Formal Consultation Period 10/11/04 – 01/02/05</u>	<u>Summary of Comments</u>	<u>Authority Response</u>
Coventry Cover	117	There will only be 5 engines and the nearest back up is 10 miles away	<p>The analysis of the distribution of fire appliances, to meet all our emergency needs, as determined by the IRMP is based on risk across the West Midlands. Maintaining a risk appropriate attendance (e.g. speed and weight of attack) ensures that we can continue to provide the same level of service. The analysis determined that 5 fire engines would be appropriate for the Coventry area. However, due to the position of Coventry within the West Midlands it was felt that further work should be carried out specifically on the Coventry area. Therefore, having carefully considered a number of the consultation responses the Authority has decided to continue to crew the second fire engine at Foleshill Fire Station between the hours of midnight and 8am. Further analysis of incidents and data will determine if this is still required in subsequent years.</p> <p>There is no evidence to support an enhanced attendance to any new hospital.</p> <p>It is and much of the new build comes with in-built detection and in some cases fire suppression systems.</p> <p>Fire crews regularly deal with the matter of local knowledge when not in their specified station areas and with major traffic delays.</p> <p>There are alternative routes into Coventry.</p>
	34	Wolverhampton and Coventry are of similar size, yet the local back up to Wolverhampton is vastly better	
	32	Solihull is also losing an appliance, so cover will be even more stretched	
	29	A high rise incident plus one other will create real problems as there will not be enough cover	
	18	The new super hospital in Coventry will need an attendance of 6 appliances	
	16	Coventry is a rapidly expanding city	
	11	Crews will be coming in with no local knowledge of Coventry	
	11	There is only one road into Coventry from Birmingham (A45). If it is closed or clogged there could be a major problem.	

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Coventry Cover	4	The cover for Coventry and Solihull is unacceptable	See the responses on page 1
	1	Birmingham pumps already do a lot of standbys at Coventry. How much will the changes worsen the situation?	
	1	The balance of cover across the city will be adversely affected	
	1	There is an increased risk of failing to meet response times	
	3	Foleshill has a large minority ethnic community, the highest level of social deprivation in the city, old housing stock and a new distribution centre (large units, no sprinklers) so cover should not be reduced here. If a pump has to go it should not be from Foleshill.	

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Reduction in Cover from Warwick-shire	19	Nuneaton, Hinckley and Bedworth are also losing cover or are retained so extra cover from here may be difficult in future	As our analysis has factored in complete appliance utilisation, including 'over the border' commitments, and all incidents attended in the last five years, our ability to provide or receive assistance is still considered to be appropriate.
	10	Bedworth will have to drive past Foleshill, where a pump is sitting idle, to respond.	
	1	Nuneaton is not aware that cover moves in the future may increase	

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Cover for Solihull	11	One appliance is an unacceptable level of cover for Solihull due to the business and housing expansion taking place. It is already the second largest residential area in the Brigade.	Our analysis, by factoring in both complete appliance utilisation and incidents attended over five years, has shown that the risk of any incidents occurring within the Solihull area is extremely low. This residual risk will be addressed by maintaining a fire engine within the station area. We will continue to monitor the risk within this area and be proactive in further risk reduction through Home Fire Risk Assessment (HFRA) for domestic properties and enforcement action in commercial premises. It is of course an average of 5 and 7 minutes and some lower risk areas of the Brigade have always exceeded these average figures. Where appropriate Fire Control will make the necessary standby cover moves into the area to provide fire cover for Solihull and the surrounding area. (See the responses under the section 'Choice of stations for reduction').
	5	Solihull covers a number of large high risk sites e.g. Airport, NEC, large hotels, Land Rover, M42, shopping centres, industrial estates etc which will be more at risk with the proposals	
	4	Already Solihull would struggle to meet times of 5 and 7 minutes on parts of the patch. This will worsen response times.	
	3	Due to the proposals there are bound to be more times when Solihull stands by in Coventry. Where will further cover for Solihull come from?	
	1	Other two pump stations are keeping two e.g. Northfield, Binley and Sheldon, yet Solihull is losing one	

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Scale and Duration of Incidents	22	The statistics show the amount of calls but not the duration or the number of fatalities / injuries	The duration of incidents and the number of fatalities/injuries has been factored in to the data.
	33	Night time incidents are invariably more serious and require more resources even if the actual number of events is less	It is statistically unfounded that night-time incidents are more serious, or require more resources.
	7	Fires go undetected for longer at night so the full PDA is needed as soon as possible to save lives	Our evidence does not support this statement. Our analysis has factored in all incidents attended for the past five years and has included the type of call and the resources required. This will be maintained.
	9	Some of the largest incidents occur in the early hours of the morning	Whilst some large incidents occur in the early hours of the morning, there are in fact fewer during this period than at other times of the day. Consideration of the required response to all large incidents has been factored into the data.
	9	A disproportionately higher number of rescues takes place at night	Our analysis has confirmed that whilst rescues from fires are higher during this period, fatalities from fires and rescues from Special Service Calls (SSCs), including Road Traffic Accidents (RTAs) are lower.
	3	The statistics do not take account of the calls received before midnight but active long after, which may be major	These calls have been factored into the analysis. Any such incident would be dealt with as all incidents starting before a change of shift but continuing beyond them.
	9	There will not be enough available crews to be able to do relief every 3 hours	Within the data we have provided for a sufficient level of crew relief.

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Scale and Duration of Incidents	5	Crews may put themselves at risk more often by having to undertake rescues before support arrives	Single pump stations already have to deal with this issue. Any rescue undertaken will follow an analysis of risk. Crews are aware of the safe systems of work that are already in place.
	2	The average number says nothing about the peaks	The average has not been used in isolation. The peaks are factored in to ensure what is being proposed is greater than our actual requirement.
	3	What happens if several big incidents occur at the same time. Are we vulnerable?	This is very rare and has been factored into the proposals.

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Firefighters put at more risk	39	This will make safety critical procedures impossible and put firefighters in a morally unacceptable position and in an unsafe working environment	It is not accepted that the lives of firefighters or the community will be put at any more risk because of the recommendations. The proposals in the Action Plan will not reduce the average attendance times as set out in last year's IRMP. At the same time our increased prevention and protection work will have a positive impact in reducing risk within the community.
	29	Lives of firefighters and the community will be put at risk	
	6	It will put unnecessary stress on firefighters and officers in charge	
	13	This will increase fire deaths and property loss	Increasing the number of HFRAs will help to maintain the current downwards trend in fire deaths and property losses.
	11	There will be accusations of negligence and possibly even corporate manslaughter.	The Chief Executive in any organisation is ultimately accountable. The current proposals have been thoroughly evaluated and risk-assessed to ensure standards are maintained and the Brigade continues to provide the same high levels of service.
	5	Safe working practices will be put in jeopardy	The safe systems of work currently in place will be maintained and therefore ensure that unnecessary risks are not taken.

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Firefighters put at more risk	10	New high rise procedures require a PDA of 4. Reducing appliances will result in delays in crews responding.	Our ability to maintain the response standards of an average of 5 and 7 minutes will be unaffected by this proposal. The requirement to meet the Brigade's policy of sending four pumps to high rise incidents has been factored into the proposals. The increased prevention work should lead to fewer incidents which will mean more resources are available overall.
	3	The safety of the public is being gambled with	
	6	More HFRA, school visits etc means less training and falling operational standards, therefore firefighters will be more at risk	It is not intended that the prevention work is carried out at the expense of operational training which is still of paramount importance to the firefighter role. We are actually increasing our focus on training, utilising our Strategic Reserve.
	7	Because people are more sleepy at night they are much more vulnerable	Whilst this is true, our data shows that fewer people in the West Midlands die or are injured in fires in this period.
	1	Deploying firefighters under "rapid deployment" will be done as a matter of course rather than under exceptional circumstances	There are no plans to change the criteria for the use of "rapid deployment". The prevention work, part of the risk reduction strategy is showing the success of our prevention and protection work, driving down the number of incidents and consequences of incidents when they do occur.

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Support from other Stations	2	Resources may be drained from across the Region in the event of a large incident in the night	Our analysis has factored in actual and complete appliance utilisation (including relief duties) and incident data for the past five years. This is also included in determining attendance times.
	2	The draining of resources from across the Region is bound to have an impact on attendance times	
	3	Other surrounding stations are becoming one-pumpers so where will the support come from, particularly for dwelling fires	Our ability to manage our resources and send risk appropriate attendances will be maintained. The analysis demonstrates that the Brigade will still be able to meet its average attendance times of 5 minutes for the first appliance and 7 minutes for the second, as at present.
	2	The second pump will take longer to arrive if there is a reduction in available appliances	
	3	Where there are incidents on unfamiliar station areas the lack of local knowledge will create problems	Cover moves and responses in other areas already take place on a regular basis and we have systems in place to manage these eventualities, such as a sophisticated Command and Control system, the Risk Register and the street index.
	2	Loss of flexibility in being able to provide cover for sickness, public leave etc from two pump stations	Sickness levels and leave are management issues and will be addressed via the Absence Management Policy and the monitoring of leave within staffing groups.

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Choice of Stations for reduction	20	How have the appliances being removed at night been selected?	<p>The analysis carried out determined the number and location of resources required to meet the operational needs across the Brigade. The justification for choosing a location for change was primarily driven by the ability to provide effective emergency response to best meet the risk and needs of the community. It has been determined that there will be one fire appliance based at each station and where appropriate this has been increased to two.</p> <p>New building developments are designed to modern building standards with in-built protection measures. Our main focus remains on higher risk areas. It is acknowledged that in the future any risk, including town centres may change and account will be taken of this.</p> <p>Using all incident data for the past five years has enabled us to analyse the risk and ensure suitable resource provision. We also use this data to support our prevention activity. Increased prevention work with the community is aimed at reducing the number of incidents and risk within the area.</p> <p>The Brigade has set up an Arson Task Force, in conjunction with the West Midlands Police, to focus on areas where this is a particular problem. The Task Force has been in existence for around 18 months and has already made significant inroads. Additionally, we will maintain an appropriate intervention resource.</p>
	6	Why are less busy stations keeping appliances?	
	4	Some one pump stations are less busy than the second appliance on 2 pump stations. Should we not be reducing for the right reasons?	
	10	Significant demographic changes to town centres are taking place.	
	2	Reducing Birmingham city centre appliances by 4 puts the city and occupants (already in high risk groups) at even greater risk	
	1	Ladywood is the most deprived area in England (government statistics) with higher than average number of dwelling fires	
	1	Concerns over reducing cover in the Sparkhill area which suffers from severe arson problems	

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Choice of Stations for reduction	1	Student accommodation in Edgbaston and a large number of hotels, hostels and derelict buildings means reductions in Ladywood will compromise the safety of the public	Because of our risk based approach the Ladywood, Highgate and Handsworth areas will receive a proportionate level of prevention activity in the Brigade. Our analysis shows we can still achieve the appropriate standard of emergency response.
	1	The Central/Ladywood/Highgate/Handsworth cluster has the highest population. Despite this and with many socially deprived areas and the highest number of tower blocks it will be the only cluster with 4 pumps.	We will continue to monitor the risk within the West Midlands, identify trends and target areas of higher risk with prevention and protection strategies.
	1	Handsworth should not lose its second pump because: <ul style="list-style-type: none"> • High density of population • High minority ethnic population • Old housing stock. High fire risk. • Lot of HMOs • Lot of elderly people and children • There are a number of special risks e.g. City Hospital, Winson Green prison, WBA football ground, motorway links etc 	Incident data analysis will ensure that whilst we maintain our ability to respond to incidents, areas identified as high risk have been targeted for appropriate prevention and protection activity. This will include operational preparedness, so that we increase our knowledge of local risks.
	1	Sandwell & Dudley area will only have single pump stations, therefore there are concerns over all of the high rises	(See the first response on the next page)

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Choice of Stations for reduction	7	Smethwick, Oldbury and West Bromwich are all losing appliances despite the area containing 4 chemical plants, factories, shopping complexes and major motorway junctions.	In the light of the consultation responses regarding specialist equipment and West Bromwich Fire Station, it has been decided to retain the crewing of the second fire engine at West Bromwich. Its continued crewing will be monitored in subsequent years.
	1	Has the proximity of Merry Hill and the increase in housing in the area been taken into account	Merry Hill has considerable in-built fire safety measures and new housing is built with modern smoke detectors, lessening risk.
	1	Wolverhampton has a large proportion of terraced housing with common roof space, therefore fire will spread quickly. Cover should not be reduced in Wolverhampton.	Our average attendance standards will be maintained. Partnership smoke alarm campaigns continue to help reduce risk in residential accommodation in the area.

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Accuracy of data	4	The data in the IRMP re fatal fires seems at odds with the fatal fires report produced by FRIS	This statement is correct. The information is different because the 2 reports are based on different time periods; IRMP data is based on the last 5 years which is considered to be a much more relevant time period. Fatal fires are at the lowest during the period concerned.
	1	The number of calls within the last 2 years has risen substantially. The use of 5 years worth of data is therefore misrepresentative.	Whilst using 5 years worth of data is completely defensible for making major decisions (based on ODPM recommendations), data for individual years was also looked at to make sure that the pattern of risk was not diluted. Smaller data sets i.e. two years, are appropriate to drive prevention activity. It should be noted that in 2004 we attended 53,569 incidents some 13,000 less than the year before.
	1	The graphs do not show the daily blips.	Whilst daily blips are not shown they are included in the calculations.
	4	The data has been presented selectively to justify the proposals	A huge amount of data has been used in the development of this Action Plan and the original IRMP, not all of which was included in the consultation document. However, all requests for additional data have been met; all of this data supports the original proposals.

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Accuracy of data	1	Attendance figures manipulated down by only listing incidents attended within each station's own area.	All incidents and attendances have been accounted for within the data. Attendance standard figures are now measured for all incidents which was not the case under the previously nationally prescriptive standards of fire cover.
	1	The reference to Fire Action Zones in the IRMP is spurious as they have not been developed in the last year, therefore there is no evidence to support the concept.	The year 2 Action Plan is designed to maintain our average attendance standards. The proposed fire engine resources meet the needs identified year on year for the past five years. Evidence on how effective these measures are being on our intervention activity, has been a consideration, i.e. when fire fatalities, rescues from SSC's, large incidents occur, etc. The original concept of 'Fire Action Zones' has been superseded by Directed Action Planning. There will continue to be developments in this area and there is evidence of successful outcomes. However, this Action Plan ensures that a high standard of response can be provided to meet the risk as it stands now. Any further future reduction in risk will be featured in future plans. The Directed Action Planning activity, as with other prevention strategies, is under constant review to ensure that it is risk, and not purely activity count, based.
	1	The HFRA action plan provides no evidence as to the success of this strategy. In terms of Children's Community Safety Education there is no policy or strategy in place to increase activity in Key Stage 1 or 3. There is little evidence to show how this activity impacts on community safety.	
	1	There has been little strategic activity in the area of media campaigns	
	1	Whilst partnerships can achieve a great deal we are not currently in a position where we can provide evidence or measurable outcomes that these are supporting the IRM.	

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Accuracy of data	2	<p>Whilst the IRMP refers directly to prevention-based activity no evidence is provided to support the concept that PBA actually works and has reduced risk in the communities where appliances will be removed. There is no evidence that this Brigade has developed the concept of targeting people at risk rather than properties linked together within an output area or other location, despite the fact that other Brigades have developed good practice models. We have not moved far enough in reducing risk in our communities from our Year 1 IRM in implementing the Action Plan before removing the response options.</p>	(See response at the foot of the previous page)

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Specialist Units and Equipment/ UKSART	21	How will the Brigade carry out rope rescue if the number of appliances are cut by half on the station where it is sited?	The proposal not to staff a fire engine at West Bromwich between midnight and 8am will be deferred until further analysis of the situation regarding specialist units generally can be undertaken. There will be no change to this revised position until at least the production of the next IRMP Action Plan.
	15	There will not be enough resources to man the Major Rescue Units	
	2	Holmatro/cutters/teleram are only on the 2 nd appliances. What then happens at night?	The whole question of equipment disposition will be looked at separately.
	12	The UKSART may be located at Solihull. How many appliances will be needed then?	This issue will be considered further when the location of this team has been decided.

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Increased risk of terrorism	7	There is an increased risk of terrorist attack, possibly in several locations at once	<p>For the periods of midnight to 0800 the number of fire engines required to provide emergency cover for operational incidents has been determined as set out in the Action Plan. Further resilience has been added to deal with Conventional, Chemical, Biological, Radiation and Nuclear (CCBRN) incidents. In addition the Authority has the ability to instigate a 'recall to duty' for all personnel should a terrorist attack take place. This type of incident has been planned for on a regional basis and adequate resources are in place to deal with the assessed risks. The possibility of simultaneous incidents has been factored into planning.</p> <p>There is no particular evidence to support this assertion.</p> <p>The recommendations of the BDAG are under review. West Midlands Fire Authority currently provides a very robust response, greater than that of many comparable authorities.</p>
	4	There will be inadequate resources for CCBRN incidents	
	1	Since New Dimension as the threat is relatively new these events will not feature in the analysis of the last 5 years data	
	1	Surely Birmingham, including Ladywood is an obvious target for terrorism	
	1	The Building Disaster Action Group (BDAG) set up following 9/11 has made recommendations which were not published when the IRMP was issued but need to be considered.	

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Reduction in Standards of Service/ Paying for a reduced service	3	Response times will be affected	As part of the analysis we have determined that our attendance standard across all emergency responses, is an average of 5 minutes for the first appliance and 7 minutes for the second. This will remain unchanged, as will our ability to manage our resources through control measures e.g. restricted first attendance This comment is based on an out of date standard which is no longer applicable. Fire engine response times show that we are maintaining our average attendance times. Considerable progress has been made in improving our performance against these targets and we are currently on schedule to meet the majority of our Fire Service specific Performance Indicator targets for 2004/05. The latest data (2004/2005) for the West Midlands shows a reduction in the number of fires attended. This is true but we are reducing risk by revising our fire engine responses to such incidents. The analysis outcomes include our ability to map and understand risk. This includes time, location etc. In the West Midlands risk is lower between midnight and 8am when the changes are proposed.
	3	Response to RTAs will be affected, and as we know the "Golden Hour" is critical	
	1	Restricted first attendance will become more commonplace	
	1	Fire engine response times are already worsening	
	1	WMFS has already failed to meet 4 out of 6 LIs relating to fires (arson- dwellings, accidental fires other than dwellings, arson other than dwellings and fires – not property/vehicles)	
	1	The number of fires per annum is still increasing (BVPP)	
	1	False alarms, non domestic, are increasing	
	3	There will be a reduction in the service at night when risk is higher	

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Reduction in Standards of Service/ Paying for a reduced service	2	Response times will become worse. Already with the dressing policy / speed limit policy the pressure is on. With more cover moves this will be exacerbated.	The whole basis of the calculations has been to ensure that response times will not be compromised and therefore the service will not be worsened.
	4	Whilst the IRM states "an average of 5 and 7 minutes" this will inevitably be a worsening of the service for those who are normally served by a 2 pump station who currently provide 2 in 5 minutes.	The standard which the public was consulted about last year has been as quoted "an average of 5 and 7 minutes". The public have not expressed any dissatisfaction with this standard.
	1	On occasions attendance times will deteriorate because fewer resources are available. However because of the use of 'average' figures these can be explained away as a 'blip'.	The 'blips' have always occurred at times when the Brigade is busy. The average 5 and 7 minutes is a standard the public have not commented adversely about in consultation.
	10	Can we expect a reduction in Council Tax as the service is being reduced?	No. The changes to the service are part of the modernisation process. Some of the savings made will be used to fund the recent firefighters' pay settlement.
	2	This plan is being used as a vehicle to secure the savings required as a result of the ODPM's budget strategy.	The plan is to ensure we are setting our resources to match risk. More of our resources will be channelled into prevention work which is known to be the best method of reducing loss of life, injuries and property losses.

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External considerations	2	Has any thought been given to the effect of the new 24 hour licensing laws?	We will continue to monitor the risk within the West Midlands, identify trends and cause and implement control measures.
	4	There has been a huge increase in the number of HMOs due to a change in the Council Tax regulations. Has this been considered?	Incident data analysis will ensure that whilst we maintain our ability to respond to incidents, areas identified as high risk continue to be targeted for appropriate prevention and protection activity. This includes operational preparedness, so that we increase our knowledge of local risks.
	1	There are a large number of HMOs in Ladywood, many of which we are probably not even aware of. Should we not collect realistic statistics on these before deciding to reduce cover?	Our plan is based on the required response to the risks as they stand now, including the risks associated with HMOs. We will continue to respond effectively to incidents. Further prevention work in future will result in even greater effectiveness.

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Increase in Prevention work	37	Agree that firefighters should use their time more productively	The Authority's plans are aimed at achieving this.
	13	Need more education in schools and home fire safety visits	The intention is to target risk and certainly increase the number of HFRAs.
	10	Public awareness about HFRA work is very low and needs to be marketed better	The Authority will make additional efforts to address this point.
	7	Some reduction in the fleet can be made without undue risk.	The Authority believes this is the case and has carefully considered its original proposals, some of which have been amended in the light of the consultation responses.

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Petitions	<p>16 (containing 13,502 signatures)</p> <p>7 (containing 160 signatures)</p> <p>1 (containing 334 signatures)</p>	<p>Request to withdraw proposals to reduce fire engine cover in Coventry.</p> <p>Request for Authority to reconsider their proposal to cut fire cover between midnight and 0800 hours.</p> <p>Requesting the retention of the fire engine at Dudley Fire Station which the Authority proposes to remove between midnight and 0800 hours.</p>	<p>See 'Coventry cover' section of this summary.</p> <p>The Authority's response is outlined in the sections above.</p> <p>See 'Specialist Units and Equipment' section of this summary.</p>