



3 Carrington Way Crewe CW13YE

---

**FIRE BRIGADES UNION**

**Brigade Secretary : Dave Williams**

Telephone : 07834656097

E-MAIL DAVEW@FBU.ORG.UK

---

**Chief Fire Officer  
Cheshire Fire Service  
Service Headquarters  
Winsford  
CW7 2FQ**

Dear Chief,

**Cheshire Fire and Rescue Authority  
Integrated Risk Management Plan 2005/06**

Cheshire FBU would like to make the following observations and comments as part of our response to the Cheshire Fire Service IRMP and as more details emerge from the Medium Term Financial Plan within the IRMP.

The FBU believes that effective Emergency Response Planning is an integral part of the wider Integrated Risk Management Planning process. Effective response planning will aim to reduce the risks to the community and the risks faced by Firefighters who are mobilised to these emergency incidents.

As you will be aware, the 1985 Standards of Fire Cover were the key driver for former emergency response planning decisions, however these (predominantly) property-based national response standards have now been abolished in favour of emergency response planning which focuses primarily on saving lives.

Clearly this shift in focus for emergency response planning will have necessitated an accompanying shift in the process used by Cheshire Fire Authority to determine an appropriate and safe emergency response.

We would be pleased to receive details of the emergency response planning process you have adopted as part of the shift to Integrated Risk Management Planning. Specifically we would be pleased, in the first instance, to receive the risk assessments (and risk & task analysis ) you have relied upon in your determination of emergency responses which are both safe and appropriate for dwelling fires and **COMAH SITES**.

Accordingly would you please forward full details of the planning scenarios you have determined appropriate for the differing dwelling risk types and areas across the whole Cheshire Fire Authority area, their associated emergency response resource requirements, and any phased attendance policy for these planning scenarios which may have been derived from the risk assessments.

In terms of emergency responses to dwelling fires, Cheshire also refer to task analysis in your best value review of shift working(you talk about optimum crewing). we would also be pleased to receive the detailed task and risk analysis you will have relied upon to inform the risk assessments.

## CHESHIRE'S IRMP & COMAH SITES

### **BACKGROUND**

In simple terms **COMAH** sites are designated as such because of the processes and/or products that are used, stored and/or produced at those sites, and the potential consequences (for both the employees and the public in the surrounding area) of an 'incident' at the site.

**COMAH** stands for **Control Of Major Accident Hazard**.

**COMAH** sites have to draw up emergency plans which are put into action when there is an incident/occurrence at the site which has the potential to develop into a Major Accident. The Fire & Rescue Service emergency response should be taken into account in the **COMAH** Emergency Plan for a site.

Accordingly, if the implications of any proposal contained within an IRMP would alter a fire & rescue service's ability to provide a certain emergency response within a certain time to a **COMAH** site then the effects of this alteration on the ability to put the site emergency plan into full operation must be considered.

Any delay or reduction in the initial emergency attendance at the site could have far-reaching implications for the site emergency plan, which is in place for the protection of the site, the employees on the site, and (importantly) the public in the surrounding areas.

It is worth remembering that **COMAH** sites (and other special risks in a brigade's area) were formerly designated as **SPECIAL RISKS** under the 1985 Standards of Fire Cover. The introduction of the **SPECIAL RISK** category alongside the **A, B, C, D** categories in 1985 was in recognition of the fact that the pre-determined Standards of Fire Cover response was not appropriate for certain premises/sites in a Brigade's area.

The addition of this **SPECIAL RISK** category in 1985 effectively introduced the concept of risk-based emergency cover for certain premises/sites which operated alongside the **A, B, C & D Risk** pre-determined response risk categories.

### **COMAH SITES & OTHER IRMP PROPOSALS**

An IRMP is supposed to be an 'integrated' plan. Proposals for reducing fire risk in (for instance) Dwellings must be integrated with proposals for emergency response to other risks (such as **COMAH** sites), together with proposals for CFS initiatives, crewing arrangements, shift systems, training etc. to ensure that a change in one area of brigade activity/response ability does not affect the ability to provide the required level of service in another area.

The proposals in the Cheshire IRMP to base emergency response on 'banded' time-slots for the arrival of the first fire engine (e.g. first appliance to arrive within 1-5 minutes, 6-10 minutes, 11-15 minutes etc.) may be the preliminary approach the Authority wishes to consider in respect of emergency responses to fires in Dwellings (i.e. the first stage of the process), but to complete the IRMP exercise the Authority must then also consider how it will ensure that it can meet the risk-based emergency response needs for Dwelling fires and the other emergencies it must plan for.

## **RESPONSE PLANNING & COMAH SITES**

The ODPM has already informed fire & rescue authorities that planning fire service emergency cover is a fundamental part of the IRMP process. This planning includes the determination of what response is required to different types of emergency incidents.

As such all fire and rescue authorities will need to define a response that is specific to the risk in an area (such as a **COMAH** site).

Planning an appropriate response involves:

- Defining the Planning Scenario (PS) that each risk in an area attracts;
- Deciding what resources are required in that scenario;
- Deciding how to 'phase' those resources i.e. in what order and what intervals they should arrive.

The 'Planning Scenario' for a **COMAH** site will be based on the individual Site Emergency Plan. The existing Plan will have been constructed with fire & rescue service input, and should have been agreed by both the local fire & rescue service and the Health & Safety Executive (which has overall responsibility for enforcement of standards at COMAH sites).

With the shift to Integrated Risk Management Planning the fire and rescue authorities will need to provide evidence that the planned response to a **COMAH** site is both safe (for Firefighters) and appropriate. Cheshire Fire Brigades union request to see this evidence.

This requirement now falls on fire & rescue authorities for all Planning Scenarios (including Dwelling Fires) and not just those Planning Scenarios based on previous **COMAH** Site Emergency Plans. This process will involve fire & rescue authorities in carrying out detailed risk and task analyses of the relevant Planning Scenarios, again the FBU wish to see the evidence that this has been carried out

Responsibility for the safety and effectiveness of the planned responses will lie with the fire & rescue authority and as such they should be approved at the highest level.

## SOME KEY QUESTIONS

There are proposals in the Cheshire Integrated Risk Management Plan which will permanently remove fire engines from the fire stations at Ellesmere Port and Frodsham. Additionally the brigade is proposing to remove one of the remaining two fire engines from stations on a programmed basis for Firefighter training purposes at Winsford Training Centre. These fire stations have historically provided the initial emergency response to the **COMAH** sites on Ellesmere Port. The proposal will increase the length of time it takes to get the currently required fire & rescue service emergency response to the **COMAH** sites on Ellesmere Port.

- What effect will this delay have on the ability of Firefighters and site personnel to put the emergency plan into effect?
- Have the individual COMAH sites been notified of this delay?
- Have the individual COMAH sites amended their site emergency plans to take account of the delay in attendance of the fire & rescue service to potential emergencies?
- Have the individual COMAH sites raised any concerns about the potential effect of the delay in attendance of the fire & rescue service to potential emergencies?
- Has a detailed risk & task analysis been carried out to quantify the potential effect (increased or decreased risk) of the delay on the Firefighters who may be sent to an emergency at the **COMAH** sites?
- Has a detailed risk & task analysis been carried out to quantify the potential effect of the increased risk to Firefighters and Officers, during and post incident, with regard to the proposal to reduce Officer posts.

The Cheshire Fire Brigades Union would be pleased to receive a response to our requests by the 31st January 2005

Yours sincerely

Dave Williams