

**Local Government New Zealand Submission on the
New Fire Legislation Discussion Document**

**“The Functions and Structure of New Zealand’s
Fire and Rescue Service”**

1 Introduction

Local Government New Zealand thanks the Department of Internal Affairs (DIA) for the opportunity to comment on “New Fire Legislation: The functions and structure of New Zealand’s fire and rescue services A Discussion Document” (the document).

Local Government New Zealand makes this submission on behalf of the National Council representing the 74 territorial authorities and 12 regional councils of New Zealand.

Local government seeks the integration of fire and rescue services, and sees this review as an ideal opportunity to achieve this. Integration needs to occur between the present urban and rural aspects of the service, and must also be inter-agency. We hope to see medical and other emergency work governed at a regional level.

We suggest a limitation of this review is the absence of analysis around the funding implications associated with the proposed options. This doesn’t suggest that funding issues ought to be resolved within this consideration of functions and structure, but that the current considerations are difficult to make in an absence of analysis as to possible funding implications.

We do make observations pertinent to funding, as part of our assessment of the alternative options proposed in the discussion document, as we believe it is a basic criterion to apply to the assessment and select a preferred option.

2 Local government involvement in the review to date

Local Government New Zealand officials have participated in the Fire Legislation Advisory Group (FLAG) established in June 2003, following a decision in the Local-Central Government Forum on 10th April 2003 “that a joint approach could be worked out to take into account broader local government concerns about the fire and rescue service”.

The Fire Legislation Advisory Group has prepared a background paper to the review, “Fire Management in New Zealand”, November 2003, that provides a concise account of the current arrangements and identifies areas where improvements and enhancements could be made to strengthen the current system. It also raises issues that may require attention in the future.

The preparation of that paper was undertaken with considerable dialogue between key participants in the fire and emergency services sector, including those from local government. In addition *Local Government New Zealand* established a Local Government Fire and Rescue Services Project Team to assist in our contribution to the review.

3 Process to prepare this local government submission

Local Government New Zealand prepared a draft paper for consideration and discussion by the Local Government Fire and Rescue Services Project Team. A draft submission was then prepared on the basis of the discussions within that Project Team and this was circulated to all councils for comment. We received a high number of responses and the comments were incorporated into a final submission for consideration by National Council.

It is our observation that those local authorities with the greatest involvement in the rural fire service strongly prefer the model represented by option 3, recognising there are still concerns in the details that will need to be addressed.

This final submission was endorsed under delegated authority by:

Basil Morrison, as National Council President;

John Forbes, as holder of the Emergency Management and Emergency Services Portfolio;

Jenny Brash, as holder of the Social Wellbeing Portfolio.

4 Role and contribution of local government to the fire service

The following vision statement, developed by the Local Government Project Team, was widely endorsed by respondents to our draft submission, and is the vision now promoted by *Local Government New Zealand*:

“The management of risk through a service that is efficient, effective and responsive to different contexts and communities”

4.1 Rural Fire Authorities

The local government sector is closely involved in fire issues, particularly in rural contexts.

Many Territorial Authorities (TAs) are Rural Fire Authorities under the Forest and Rural Fires Act. Only twenty two TAs do not have direct responsibility as Rural Fire Authorities, and even these are involved in funding the enlarged Rural Fire Districts that have assumed their responsibilities under the Act. Some of those TAs do also provide staff to assist in such functions as issuing fire permits.

Territorial Authorities do not have the same responsibilities for structural fires under the Fire Service Act.

Many employees of TAs have formal training in rural fire management, whilst a greater number have taken part in particular short courses relating to aspects of fire management. Many have taken part in controlled burns and in fire suppression activities.

Generally there is close collaboration between TAs in rural fire management, and there are a number of outstanding examples of this. Canterbury, Southland, the West Coast, the Coromandel and Nelson are examples where formal collaboration has “bedded-in”; the Wairarapa is an example of the most recent amalgamation for rural fire management.

The collaboration between the Fire Service and TA’s in rural fire management is variable across the country. A number of Rural Fire Authorities, especially TA’s, have Section 15 (Forest and Rural Fires Act) Agreements with the NZ Fire Service which formalise the provision of equipment and manpower for rural fires. The Fire Service is often the first responder to vegetation fires outside the urban area, and this function is valued. However, the equipment available to urban fire fighters, the training they receive, the nature of the fire behaviour and the terrain in which the fire needs to be fought often means that the NZ Fire Service is unlikely to be able to suppress a medium to large vegetation fire (a fire taking 24 to 48 hours to control and mop up) using its own resources without specialised support.

Nevertheless, some TAs have contracted the Fire Service to fulfil part or all of their responsibilities as rural fire authorities.

Regional councils do not currently have a significant role in fire. If their role is to be expanded, further consultation will be required. Some regional councils, particularly in the South Island, have high country burning by-law. This highlights that there is a relationship between regional councils' natural hazard management and sustainable management roles that may inter-face with fire management activities, and therefore complement the work of the rural fire service.

4.2 National Rural Fire Advisory Committee

Local Government New Zealand has two representatives on the National Rural Fire Advisory Committee. This Committee has a role in providing advice to the National Rural Fire Officer and to the Fire Service Commission, acting as the National Rural Fire Authority.

4.3 Other responsibilities complementing the fire management role

Local government has responsibilities under other legislation concerned with addressing potential fire issues.

- The Building Act 1991 requires the TA to become involved in fire safety issues when issuing building permits, and when closing dangerous buildings.
- Fire is an important consideration in regard to dealing with hazardous substance transport and storage.
- Subdivision design and reticulated water supply for fire fighting are urban issues around which TA's and the Fire Service interact.
- As providers of local road networks, councils manage roadside vegetation, with an eye on the managing fire risk.

There is generally good collaboration between the TA's and the Fire Service in these areas.

The Local Government Act 2002, amongst other things (in Part 8 Sections 183 and 184) allows local authorities to order the removal of flammable vegetation which constitutes a fire hazard. Section 145 allows the making of by-law, and these may relate to minimising fire hazard.

Local government has responsibilities under the Civil Defence and Emergency Management Act (CDEM Act) that provide another aspect to the sector's relationship with fire management. Although the Resource Management Act (RMA) includes wildfire as a "natural hazard", not all rural fire authorities are involved in the detailed civil defence organisations.

4.4 The role of the Fire and Rescue Service

While the focus of this review is on the fire management and rescue service role, it is important to acknowledge that the fire service is frequently called upon to assist in other emergency situations.

It is apparent that much of the emergency response activity of fire brigades has nothing to do with fire management, and frequently, little to do with rescue. The emergency response service, reflected in the 111 selection of police, ambulance or fire service, sees the fire service attending all manner of personal emergencies. Both professional and volunteer brigades attend car crashes, not only to extract trapped parties, but to assist in clean up to make the scene safe, perhaps dealing also with hazardous substances. The fire service pumps out flooded property, helps clean up after a slip, climbs into trees or attics to rescue pets, extract toddlers from the places where they get themselves stuck, and help to heave livestock out of bogs or steep gullies. Much of this work is not part of the formal brief of the fire service, but councils ask, who else could assist in these situations.

Local Government New Zealand suggests that the full breadth of assistance currently provided by the fire service, (both professional and volunteer), to individuals in times of need, does need to be taken into account in this review.

5 Policy Principles

5.1 Look for consistency of approach in developing functional and structural models

Local Government New Zealand suggests that new fire legislation must be consistent with, and where possible support the ability of councils to give effect to the CDEM Act 2002 and other relevant legislation. We also refer this review to the work being undertaken within the Regulatory Frameworks Project, led by the DIA.

5.2 Consider existing structures and seek to provide efficiencies and to avoid duplication.

A number of governance and management structures associated with risk management and emergency services currently exist. We suggest there is a need to limit any duplication of these structures, particularly where alignment and/or complementary functions occur. There is, however a need to consider the work load of existing structures. We request that a comprehensive assessment be made of the possibility for alignment between existing structures, in the establishment of any similar model for the fire and rescue Service.

5.3 An arrangement that provides for and balances local, regional and national interests.

Local Government New Zealand suggest that in order to meet community expectations, decision making about the fire and rescue service ought to be kept local, while allowing for stronger regional coordination and for national policy as necessary to support the vision described earlier.

5.4 Promoting communities wellbeing and supporting volunteerism

We are aware that there is a potential in this review to derive a management response that could counter against councils' ability to promote community wellbeing, particularly in rural communities. Councils consistently describe a need to support a volunteer ethic, as a critical component of promoting wellbeing. New Zealand communities, particularly rural communities, have a long tradition of looking after themselves and their neighbours. An expression of this is that they will provide funds and services in kind to establish community facilities that are not affordable under other funding arrangements. Such facilities are then only able to be operated and maintained through the commitment of volunteers. The Rural Fire Service is a part of this tradition. *Local Government New Zealand* suggest it may be counterproductive to the survival of rural communities, if allowing them to look after themselves is made too complex with the imposition of national requirements that may be too onerous for volunteers to comply.

In this review there is a balance to be struck between requiring a minimum level of service or expertise by the fire and rescue service, to ensure a standard of care that might be expected by all citizens no matter where they need assistance and raising the bar to a degree that may be simply unattainable in some contexts. We believe there will need to be an acknowledgment of different contexts that may lead to different standards being applied. Providing such flexibility does not lead automatically to separate organisational structures. It is possible for one structure to accommodate the diversity of New Zealand contexts and be responsive to local needs and discretion.

5.5 Provide a definition of rescue to cover the breadth of work the fire service does

The term "rescue" is poorly defined in the discussion document, and we are aware that has caused different interpretations to be applied to that term. There is a need for it to be clarified. For example, a number of local authorities have established civil defence rescue teams. Would a new fire and rescue organisation take over responsibility for these? Similarly, some have asked, "What is the relationship to be between the new fire & rescue service and other rescue-providing organisations?"

6 Principles of land management associated with fire implications.

Local Government New Zealand makes the following points in relation to the implications of fire on forest and rural land management. These comments reflect that local authorities are mostly involved in rural, vegetation fire management. We do recognise that the New Zealand Fire Service is involved in vegetation fires in the urban context.

- 6.1 Fire is used for a variety of land management practices in forestry, agriculture and horticulture. The misuse of fire has contributed to a number of rural fire inquiries followed by amendments to legislation. Rural communities continue to use fire for land management purposes, including for example: the burning of cereal stubble; and for some land clearance activities.
- 6.2 Landowners, including forest owners, are constrained in their use of fire through the Forest and Rural Fires Act 1977 via a series of mechanisms such as controlled burning seasons, permits to burn, controlled burn plans etc.
- 6.3 Landowners may also be constrained in vegetation management through the Local Government Act.
- 6.4 The accountability for the controlled use of fire lies with the Rural Fire Authority (RFA), often TAs, whose staff monitor weather conditions, issue the permits and approve the burn plans.
- 6.5 Wildfires are considered the result of land management practices going wrong for some reason, even though natural events like lightning strike are often very difficult to manage for. Wildfires through arson are also difficult to mitigate against. Even so, in the rural context, accountability for wildfires lies with the landowner - "whoever owns the fuel owns the fire". If the person who lit the fire is known or found, accountability shifts to that person. This principle is well established in law and case law.
- 6.6 There is an element of inequity between urban and rural landowners in the two Acts, given that urban dwellers are not accountable for fire costs (essentially it is not presumed that they "own the fuel"). Property owners who suffer damage may claim in a civil case, but there is no automatic cost recovery of fire fighting in the urban context.
- 6.7 The severity of a wildfire depends on the weather conditions at the time, the topography, the fuel types it is burning, and the amount of fuel available to it. The accountability for predicting fire behaviour lies with the Fire Authority under the Forest and Rural Fires Act. Similarly, the accountability for reducing the amount of fuel available to a wildfire may lie with the Fire Authority, although the Local Government Act can also be relevant.
- 6.8 Land and forest managers have a duty of care to society and to the environment. Because fires are mostly caused by man-made activities, fire control programmes need to operate continuously. Fire Authorities are accountable for these.
- 6.9 Land and forests can be made less vulnerable to wildfire through a series of planned and deliberate management actions. Such actions include reducing or removing fuel from key locations, maintaining access to key locations and ensuring trained personnel are available on a continuing basis. Fire Authorities are accountable for this. Often, the Fire Authorities are the land managers or forest owners so such actions are manageable.

7 Strategic Imperatives for Local Government

Local Government New Zealand submits that there are a number of preferred outcomes that need to be provided for in the new legislation. These include that:

- 7.1 Professional land and forest management is essential to maintain the planned and agreed ecological, cultural, productive and scientific outcomes from New Zealand's lands.
- 7.2 Local government has wide-ranging responsibilities pertinent to land management, and rural fire management is but one management influence that could be integrated into an overall risk management regime.
- 7.3 There are many good aspects in the current rural fire legislation, including, for example, the clear allocation of accountabilities. Retain and build upon existing strengths through this review.
- 7.4 Inequities in the current legislation ought to be addressed so that all land owners pay their relative fair share (depending on risk) of the local or regional fire protection costs.
- 7.5 The provision of a fire and rescue service is best managed taking a regional and multi agency approach, (for example, to risk management or to ecosystem management), so that the relevant local and regional communities have a stake in that management.
- 7.6 Provide for the continuance and support of "volunteerism" in order to maintain community expectations and to assist communities, particularly rural communities, to foster and encourage volunteers. Give protection to volunteers, in part through the promotion of an integrated fire and rescue service. Maintain and enhance the existing volunteer service, and explore ways to do that. For example, consider providing protection in employment law to allow a volunteer to take emergency leave to attend incidents and/or specialised training; provide an allowance for call out (perhaps payable to an employer).
- 7.7 Accountabilities must be appropriately targeted: Landowner; Fire starter; Fire authority staff - for permits; PRFO (or specifically warranted officer), for the conduct of the Authority (etc)
- 7.8 Make one body responsible for all activities within vegetation fire management. That is, that accountability for fire suppression (response) not be separated from the accountability for reduction and readiness aspects of fire management.
- 7.9 Provide an integrated Fire Service with one controlling authority.
- 7.10 Retain, build on and strengthen the existing infrastructure, resources and goodwill in the fire sector. For example, with forestry companies (that are Rural Fire Authorities), and the Department of Conservation.

8 Selecting a Preferred Option

Local Government New Zealand's vision of a new fire and rescue service:

Management of risk through a service that is efficient and effective, and responsive to different contexts and communities.

In order to fulfil this vision, local government envisages an integrated fire and rescue service in the future, able to provide national coordination, a regional mandate and local ownership. We submit that there need be no duplication of services.

National coordination must be able to differentiate between vegetation and structural fires and the different skills and competencies needed, and set the standards required to manage those. Given the "principles of land management" and "strategic priorities" outlined previously, the following table assesses the relative advantages and disadvantages of the three alternative options.

MODEL NAME	ADVANTAGES	DISAVANTAGES
National	<ul style="list-style-type: none"> • Clean & simple to legislate; • easy to operate, (but possibly more costly); • Ideal for a response led organisation. • National consistency • Could ensure integration 	<ul style="list-style-type: none"> • One size does not fit all; • No system to take stakeholder views into account; • Poorly defined relationship with local communities; • No direction on the role of local government in either structural or vegetation fire management; • No direction or distinction between structure and vegetation fires. • Difficult to integrate with existing CDEM Group - Regional management and governance.
Modified Status Quo	<ul style="list-style-type: none"> • NRFO sets standards for rural fire management. 	<ul style="list-style-type: none"> • Could be inefficient; • Geographical responsibility means that Fire Authorities outside urban areas would have to acquire new skills, equipment etc to deal with structure fires; • No effective control over Fire Authorities; they are not responsible to the CEO or Board; • No incentive to integrate systems; • NRFAC still only advisory; • RRFACs still have no authority.
National-Regional model (Note: this would need to be modified)	<ul style="list-style-type: none"> • Locally owned • Board also appoints the National Director of Operations; 	<ul style="list-style-type: none"> • No mention of National Director of Rural Operations. • Advisory Boards not seen to have a formal function or

MODEL NAME	ADVANTAGES	DISAVANTAGES
	<ul style="list-style-type: none"> • Can focus on regional fire management issues - there is scope for coordination of fire suppression and fire management activities; • Local stakeholders taken into account - local input into the business plan; • Local government likely to play an important role; • Scope for regional cooperation; • Scope for integrating systems based on regional fire risk - local conditions determine the skill and resourcing levels required for both structural and vegetation fires; • Scope for distinguishing the skills required for managing vegetation and structure fires; • Able to integrate with CDEM systems and governance. • Size and scale of the organisation would be determined locally/regionally. • Able to be integrated into CDEM Group • A comprehensive emergency management service would be more responsive to local and regional needs. 	<p>power.</p> <ul style="list-style-type: none"> • Relationship with regional and local communities not fully defined; • Role of Local Government not defined

9 A Preferred Option

This analysis suggests that Option 3 is the preferred choice. However, we suggest that this option is not adequately described in the Discussion Document.

Local Government New Zealand favours *Option 3* with a number of provisos including:

- 9.1 The proposed Advisory Board at regional level be replaced with a system that provides more focus on aligning the Fire & Rescue services with the existing CDEM Group and CEG structures. In this way duplication can be avoided, and the local ownership

regarded as necessary is already in place. Any functions of the proposed Advisory Boards could become functions of a combined fire and rescue plus CEG. This group ought to be required to approve the annual business plan for the region. This would provide a role that is more than advisory, and the regional director should be required to actively consult with the group. Care would need to be taken to ensure that the role of the Board does not usurp the role of the Chief Executive.

Some in local government are opposed to this expanded use of the CEG structure, as it is felt that the CEG members already have full work loads and that the size of the group would be unwieldy with the increased membership needed to undertake the additional work associated with fire and rescue service functions. Instead it was suggested that synergies would arise by having some members common to both Boards. That proposition presents a different set of challenges.

Another option is to have a Regional Operations Board that would agree the strategic operational direction for the region, and recommend the Annual Plan to the CEO.

Still another option is to formalise the existing Regional Rural Fire Committee, to provide coordination and ensure cooperation.

Local Government New Zealand suggests more work needs to be undertaken to explore the merits of the options, recognising a need to provide efficient and effective delivery of across a the related and complimentary functions, and not simply view the fire service in isolation.

- 9.2 There needs to be a “technical section” or equivalent provided within the national structure, covering both vegetation and structural fires, to set operational standards; audit regional authorities against those standards; set training standards; coordinate a national fire publicity programme; coordinate and support fire research; manage the response to large incidents beyond the resources of one region; manage international relationships and the deployment of requested personnel.
- 9.3 The regional governance structures needs to establish accountability for vegetation as well as structure fires in terms of responsibilities and maintain the over-arching policy framework. Governance should be separated from management and operational decision making functions, for example, as in the CDEM Group Joint Committee (governance) and CEG (advisory). A regional management system is required to recognise the particular fire threat in the region (structural or wildfire) so that there is a suitable management structure to provide the skills and expertise needed to discharge the duty of care for each region’s stakeholders. Further, the regional manager needs a mandate and clear responsibilities to deliver the operational requirements and to provide professional expertise to the governance body.
- 9.4 That inter-regional cooperation and sharing of resources be required, as per the CDEM Act 2002.
- 9.5 That specific statutory power for rural officers (modified from those currently defined for PRFO’s) is recognised in legislation, not reliant on delegation from the regional director.
- 9.6 The other non-fire activities undertaken by (rural) volunteers also need to be recognised as legitimate functions of the service and provision need to be made to enable volunteers to be indemnified against, when undertaking this work. For example, pumping out basements, attending accidents or hazardous substance incidents,

rescue. These provisions need to be linked to better definitions of the role of the volunteer and the provision of training as appropriate for this type of work.

- 9.7 That particular organisations and/or landowners be able to “contract out” of the national service provision if they meet, and continue to meet, national fire management standards.
- 9.8 That the NZ Fire and Rescue Board be restructured to include a mix of management and operational people to provide the appropriate blend of knowledge and skill.

10 Specific Matters in the Discussion Document

10.1 Integration of urban and rural fire services

Local Government New Zealand believes that there is scope to provide an integrated structure that provides greater parity between those involved in managing vegetation and structural fires. While the development of multi-skilled teams is an ideal aim, there is a need to recognise specialisation in the management of vegetation fires, just as there is for structural fires.

However, we believe that the current rural focus on managing the rural risk environment in a holistic manner has come from a long history of dealing with, and learning from, occasional dramatic rural fire events and that must be maintained. The current emphasis on risk identification and risk management in the rural sector needs to be owned at the local level, maintained at the regional level, and supported at the national level.

Local Government New Zealand believes that there are differences between vegetation and structural fires, and these differences need to be reflected in certain parts of any national fire and rescue service organisation. There needs to be a rural/vegetation thread down through the new organisation.

For service delivery, local government believes that an integrated organisation must provide for the continuation with managing for the 4 “Rs”, including the existing “Reduction” and “Readiness” functions of Fire Authorities (e.g. monitoring weather conditions, fire season management, fire permit issue, vegetation management), and to recognise these roles within the structure. There may be scope to involve volunteers in such work in certain regions.

10.2 Regional organisation and local consultation

Local Government New Zealand has a concern that the Regional Advisory Board as suggested in Option 3 may lead to duplication of services, and could usurp the role of the Chief Executive. Instead, Fire and Rescue Services could become part of the regional risk management system, and contribute expertise based on national standards in both vegetation and structural fire management (including hazard management) and response.

Part of this regional risk management system already has a governance structure in place in the form of CDEM Group Joint-Committees and their CEGs that include emergency response organisations, with local ownership, and regional fire and rescue services could further integrate with this. Different regions would have different requirements for the appropriate mix of vegetation and structural skills in the management system.

There should be a National Advisory Board at the governance level to provide advice to the Board on standards, volunteer issues, equity issues, training, coordination, international cooperation etc.

The funding issue has relevance at this point as the funders will want representation at a governance level.

10.3 Contracting volunteers

Local Government New Zealand has no strong position on this issue, beyond pointing to the requirements of the health and safety legislation, and the flexibility to allow delivery against performance standards. The majority of the submissions favoured the concept of the new organisation contracting at the Brigade or Rural Fire Force level, not individual volunteers.

A number of territorial authorities and other rural fire fighting agencies rely on volunteers, in addition to paid staff to carry out the fire management work. Volunteers generally seek the exciting fire suppression work, but are often not able to commit long lengths of time to a particular incident or to reduction. Local authority staff and contractors on the other hand are very keen to prevent as well as to suppress fires.

Local Government New Zealand wishes to highlight examples of supporting volunteerism that could be examined - a retainer, extra leave, employment protection and other mechanisms to value the volunteer ethic and ensure that volunteers may train and attend incidents without jeopardising their employment. For example, note that Jury Service is paid.

There is an urgent and particular need to indemnify volunteers who carry out non-fire work. They need extra training in the service they are being asked to provide, and be made aware of the protocols that apply.

10.4 Contracting out of the system

Local Government New Zealand believes that a land owner should be able to contract out of a national protection system if they meet and maintain a system that meets minimum national standards. The contracting out organisation should be audited against those standards on a regular basis.

We have concerns that, with the reasonably regular ownership changes of some of the large forestry organisations, there may be some movement into and out of the national system. We suggest that a minimum time frame be put around leaving or re-joining the national system so the regional fire and rescue organisation is able to resource itself appropriately. There are also concerns that funding will not be just for fire fighting, and so there should be a minimum charge that all land/property owners will have to meet to cover the non-fire activities and other community responsibilities.

We would favour the ability of regional directors to enter into agreements with such external organisations, to the mutual benefit of both parties, particularly to cope with large incidents that are beyond the capability of either party by itself to control.

10.5 Composition of a new Fire and Rescue Board

Local Government New Zealand agrees that the new Board will require a different range of knowledge and experience, particularly in forest and rural fire management. The prerequisite skills need to be defined and people appointed accordingly.

These comments also apply to the “advisory board”, should Government go with that option

10.6 Statutory powers for staff

Local Government New Zealand believes that the current statutory positions created through the Forest and Rural Fires Act should be retained in some form, so that accountabilities are clear. This should be through legislation and not by delegation. The current legislation is not perfect in this area, and some of the PRFOs’ powers are quite draconian and not in keeping with other legislation, such as the Health and Safety in Employment Act, and the Employment Relations Act.

As a minimum, legal protection to (rural) volunteers in the process of carrying out non-fire work in good faith is required. Staff also require legal indemnity for work not covered by current legislation, as well as statutory powers to produce an efficient and effective system.

The legislation will need to ensure that some delegation powers are retained so that volunteer-based operations are not compromised by the lack of a statutorily warranted officer.

11 Conclusion

Local Government New Zealand seeks the integration of fire and rescue services, and sees this review as an ideal opportunity to achieve this. Integration needs to occur between the present urban and rural aspects of the service, and must also be inter-agency. We hope to see medical and other emergency work also governed at a regional level.

We suggest a limitation of this review is the absence of analysis around the funding implications associated with the proposed options. This does not suggest that funding issues ought to be resolved within this consideration of functions and structure, but that the current assessment is difficult to make in an absence of analysis as to possible funding implications.

Never-the-less, our analysis suggests that Option 3 is the preferred choice, although we describe that this option is not adequately described in the Discussion Document and so provide a number of suggestions to improve that model for application.