



DEVON & SOMERSET FIRE & RESCUE AUTHORITY

**M. Pearson
CLERK TO THE AUTHORITY**

To: The Chair and Members of the Devon & Somerset Fire & Rescue Authority

(see below)

**SERVICE HEADQUARTERS
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Your ref :
Our ref : DSFRA/MP/SY

Date : 2 January 2020
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DEVON & SOMERSET FIRE & RESCUE AUTHORITY

(Extraordinary Meeting)

Friday, 10th January, 2020

A meeting of the Devon & Somerset Fire & Rescue Authority will be held on the above date, **commencing at 10.00 am in Conference Rooms A & B, Service Headquarters, Exeter** to consider the following matters.

M. Pearson
Clerk to the Authority

AGENDA

PLEASE REFER TO THE NOTES AT THE END OF THE AGENDA LISTING SHEETS

1 Apologies

2 Items Requiring Urgent Attention

Items which, in the opinion of the Chair, should be considered at the meeting as matters of urgency.

PART 1 - OPEN COMMITTEE

3 Questions and Petitions from the Public

In accordance with [Standing Orders](#), to consider any questions and petitions submitted by the public. Questions must relate to matters to be considered at this meeting of the Authority. Petitions must relate to matters for which the Authority has a responsibility or which affects the Authority. Neither questions nor petitions may require the disclosure of confidential or exempt information. Questions and petitions must be submitted in writing or by e-mail to the Clerk to the Authority (e-mail address: clerk@dsfire.gov.uk) **by midday on Tuesday 7 January 2020.**

4 Addresses by Representative Bodies

To receive addresses from representative bodies requested and approved in accordance with Standing Orders.

5 Questions from Members of the Authority

To receive and answer any questions submitted in accordance with Standing Orders.

6 Safer Together Programme (Service Delivery Operating Model) - Outcomes of Consultation on Reallocation of Resources (Pages 1 - 132)

Report of the Chief Fire Officer (DSFRA/20/1) attached.

MEMBERS ARE REQUESTED TO SIGN THE ATTENDANCE REGISTER

Membership:-

Councillors Randall Johnson (Chair), Best, Biederman, Bown, Buchan, Clayton, Coles, Colthorpe, Doggett, Drean, Eastman, Hannaford, Healey MBE, Napper, Peart, Prowse, Radford, Redman, Saywell, Thomas, Trail BEM, Tuffin, Vijeh, Way, Wheeler (Vice-Chair) and Yabsley

NOTES

1.	<u>Access to Information</u> Any person wishing to inspect any minutes, reports or lists of background papers relating to any item on this agenda should contact the person listed in the “Please ask for” section at the top of this agenda.
2.	<u>Reporting of Meetings</u> Any person attending a meeting may report (film, photograph or make an audio recording) on any part of the meeting which is open to the public – unless there is good reason not to do so, as directed by the Chair - and use any communication method, including the internet and social media (Facebook, Twitter etc.), to publish, post or otherwise share the report. The Authority accepts no liability for the content or accuracy of any such report, which should not be construed as representing the official, Authority record of the meeting. Similarly, any views expressed in such reports should not be interpreted as representing the views of the Authority. Flash photography is not permitted and any filming must be done as unobtrusively as possible from a single fixed position without the use of any additional lighting; focusing only on those actively participating in the meeting and having regard also to the wishes of any member of the public present who may not wish to be filmed. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chair or the Democratic Services Officer in attendance so that all those present may be made aware that is happening.
3.	<u>Declarations of Interests at meetings (Authority Members only)</u> If you are present at a meeting and you are aware that you have either a disclosable pecuniary interest, personal interest or non-registerable interest in any matter being considered or to be considered at the meeting then, unless you have a current and relevant dispensation in relation to the matter, you must: <ul style="list-style-type: none">(i) disclose at that meeting, by no later than commencement of consideration of the item in which you have the interest or, if later, the time at which the interest becomes apparent to you, the existence of and – for anything other than a “sensitive” interest – the nature of that interest; and then(ii) withdraw from the room or chamber during consideration of the item in which you have the relevant interest. If the interest is sensitive (as agreed with the Monitoring Officer), you need not disclose the nature of the interest but merely that you have an interest of a sensitive nature. You must still follow (i) and (ii) above. Where a dispensation has been granted to you either by the Authority or its Monitoring Officer in relation to any relevant interest, then you must act in accordance with any terms and conditions associated with that dispensation. Where you declare at a meeting a disclosable pecuniary or personal interest that you have not previously included in your Register of Interests then you must, within 28 days of the date of the meeting at which the declaration was made, ensure that your Register is updated to include details of the interest so declared.
4.	<u>Part 2 Reports</u> Members are reminded that any Part 2 reports as circulated with the agenda for this meeting contain exempt information and should therefore be treated accordingly. They should not be disclosed or passed on to any other person(s). Members are also reminded of the need to dispose of such reports carefully and are therefore invited to return them to the Committee Secretary at the conclusion of the meeting for disposal.
5.	<u>Substitute Members (Committee Meetings only)</u> Members are reminded that, in accordance with Standing Order 37, the Clerk (or his representative) must be advised of any substitution prior to the start of the meeting. Members are also reminded that substitutions are not permitted for full Authority meetings.

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Agenda Item 6

REPORT REFERENCE NO.	DSFRA/20/1
MEETING	DEVON & SOMERSET FIRE & RESCUE AUTHORITY
DATE OF MEETING	10 JANUARY 2020
SUBJECT OF REPORT	SAFER TOGETHER PROGRAMME (SERVICE DELIVERY OPERATING MODEL) - OUTCOMES OF THE CONSULTATION ON REALLOCATION OF RESOURCES
LEAD OFFICER	CHIEF FIRE OFFICER
RECOMMENDATIONS	<p>(a). <i>that, having taken account of analysis of the outcome of the consultation on the reallocation of resources to support the new Service Delivery Operating Model, the following be approved:</i></p> <ul style="list-style-type: none"> (i) <i>Deferral of the decision to implement day crewing at Barnstaple, Exmouth & Paignton, <u>subject to a revised 24/7 crewing model, including roving appliances, being agreed with the Fire Brigades Union before the end of the 2019-20 financial year;</u></i> (ii) <i>Closure of Budleigh Salterton fire station, with affected firefighters allowed to respond from Exmouth fire station;</i> (iii) <i>Relocation of Topsham fire station to Service Headquarters and relocation of one fire appliance to Middlemoor fire station (both existing Topsham fire appliances to be relocated to Service Headquarters until an On-call crew can be established at Middlemoor);</i> (iv) <i>Removal of the third fire appliances from Bridgwater, Taunton, Torquay & Yeovil;</i> (v) <i>Removal of the second fire appliances from Crediton, Lynton, Martock & Totnes fire stations;</i> (vi) <i>Introduction of variable fire appliance availability dependent on risk as set out in para 9.14.</i> <p>(b). <i>That the Authority notes the arrangements for payments for On-call Firefighters as set out in section 6 of the report.</i></p> <p>(c). <i>that, in approving a new Service Delivery Operating Model, existing emergency response standards be maintained but an explicit performance target for meeting the first appliance attendance times for both incident types (house fires and road traffic collisions) on 75% of all occasions be set.</i></p>
EXECUTIVE SUMMARY	<p>Feedback from the consultation responses has allowed the Service to re-shape an alternative proposal for the Service Delivery Operating Model under 'Option 7 – Mix and Match.'</p> <p>This option will contribute towards achieving HMICFRS</p>

	<p>recommendations in terms of improving efficiency, effectiveness and people aspects of our work.</p> <p>The recommended option aims to strike the balance between driving reform and enabling reallocation of resources to risk, specifically providing more prevention and protection activity.</p> <p>This option also clearly demonstrates the Service's aspiration to improve fire engine availability by increasing investment in a new On-call contract.</p>
RESOURCE IMPLICATIONS	<ul style="list-style-type: none"> • £4.031m capital savings • £1.848m investment revenue • Minimum £2.0m re-investment into prevention & protection activity
EQUALITY RISKS AND BENEFITS ANALYSIS (ERBA)	<p>People Impact Assessments (which incorporate equalities, risks and benefits assessments [ERBAs]) carried out for all elements of new model for DSFRS staff.</p> <p>Community Risk Assessments carried out for impact on communities.</p>
APPENDICES	<p>A. The Consultation Institute Certificate of Readiness</p> <p>B. ORS Consultation feedback report summary</p> <p>C. Emergency Response maps of Devon and Somerset</p>
LIST OF BACKGROUND PAPERS	<p>A. DSFRS Integrated Risk Management Plan (IRMP) 2018 – 2022</p> <p>B. DSFRS Fire and Rescue Plan (FRP) 2018 – 2022</p> <p>C. DSFRS Consultation Summary report and associated appendices</p> <p>D. ORS Consultation feedback report</p> <p>E. DSFRS Option 7 Community Impact Assessment</p> <p>F. DSFRS People Impact Assessment summary</p> <p>G. DSFRS Analytical Comparison of Service Delivery Operating Model Impacts Report</p> <p>H. DSFRS Power-point presentation on the Service Delivery Operating Model</p> <p>I. Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) report 2018 - 2019.</p>

1. INTRODUCTION

- 1.1 The Vision of the Devon & Somerset Fire & Rescue Service (“the Service”) is that *‘Together we will work to end preventable fire and rescues emergencies, creating a safer world for you and your family.’* One of the ways the Service will do this is by *‘involving communities and colleagues in designing our services.’*
- 1.2 The Service has recognised that the current, traditional delivery model does not fit the needs of the communities or the aspirations for a progressive, modern fire and rescue service. Many station locations and appliances are based on historical, fixed locations. In some areas there is an overprovision of resources, in other areas there are not enough. Operational duty systems are inflexible and are based solely on response rather than preventing emergencies from happening. The On-call model is based on financial reward for attending incidents, when incident numbers are reducing in line with the Service vision. Historical rules mean that all fire appliances have been crewed with a minimum of four firefighters which effects availability and response times, impacting on public safety, whilst restricting the opportunity for on-call staff to attend emergencies and increase their earnings.
- 1.3 The proposals in this paper are innovative, progressive and driven from staff and public feedback. They are designed to improve the reliability of emergency cover, in particular for On-call stations. The Service aims to remove resources such as appliances and stations that are not needed and invest heavily where we need an improved service.
- 1.4 In terms of protection (business safety) and prevention (community safety), the Service aims to increase the number of community and business safety visits significantly by moving a proportion of staff from the current Whole-time contract onto a new Day Duty system. These staff will use existing vehicles to carry out visits such as commercial premises risk checks and community safety tasks whilst continuing to be able to respond to emergencies (this is what we call ‘roving vehicles’). This will result in an anticipated additional 50,000+ hours of prevention and protection work per annum and an increase in the number of fire appliances providing operational cover during the day.
- 1.5 The Service also aims to introduce a new contract for On-call firefighters that will pay an increased wage for availability and allow staff to attend incidents with fewer than four firefighters on a fire appliance. It remains an aspiration to have fire appliances crewed with a minimum of four firefighters but this is not always possible to achieve. This flexibility will result in better earnings for staff which will improve recruitment and retention and increase the availability of fire appliances which improves our service to communities. Whilst this will increase costs by circa £1.4m per annum, it will improve the availability of fire engines when needed, which will improve response times.
- 1.6 This paper clearly sets out the reasons for change and will articulate why the recommended option will make the Devon & Somerset Fire & Rescue Service and the communities it serves ‘Safer Together.’

2. BACKGROUND AND TIMELINE

Strategic Planning

- 2.1. In 2018, the Devon & Somerset Fire & Rescue Authority (“the Authority”) approved the latest iteration of its Integrated Risk Management Plan (IRMP). This four-yearly process is required through the Fire and Rescue National Framework for England and requires the Authority, amongst other things, to ‘assess all foreseeable fire and rescue related risks that could affect their communities’.

- 2.2. The outcome of the IRMP identified the following relevant community risks:
- An increasingly ageing population;
 - Common Health and Wellbeing risks;
 - The level of unavailability of On-call appliances;
 - The historical distribution of Service Delivery Resources;
 - An increase in the number of serious fires affecting commercial premises.
- 2.3. Further strategic planning work carried out during 2018 culminated in the production of the Service's Fire & Rescue Plan (FRP), which set out the following relevant challenges amongst others within the Service Delivery function of the Service:
- Aligning resources to risk and prioritising prevention and protection activity;
 - The current way fire stations and appliances are crewed;
 - Service emergency response standards;
 - The availability, recruitment and retention of On-call staff;
 - The relocation of some stations, appliances and staff to areas where risk is greatest or where circumstances may have changed.
- 2.4. To address the risks from the Integrated Risk Management Plan and Fire & Rescue Plan, the Authority approved at its meeting on 28 June 2019 the Safer Together Programme Service Delivery Operating Model Phase 2: Reallocation of Resources for public consultation (Minute DSFRA/17 refers).
- 2.5. The following options were initially recommended to the Authority for public consultation purposes:
- Option 1. 8 Station closures
 - Option 2. 8 Station closures and removal of 4 third fire engines
 - Option 3. 8 Station closures, removal of 4 third and 4 second fire engines
 - Option 4. 8 Station closures, removal of 4 third, 4 second fire engines and change of status to day crewing at 3 Whole-Time stations
 - Option 5. 8 Station closures, removal of 4 third, 4 second fire engines, change of status to day crewing at 3 Whole-time stations and change of status to On-call at night only for some second fire engines
 - Option 6. 8 Station closures, removal of 4 third, 4 second fire engines, change of status to day crewing at 3 Whole-Time stations, change of status to On-call at night only for some second fire engines and the introduction of 6 day crewed roving fire engines
- 2.6. The options were presented as an escalating and balanced set of outcomes in order that the minimum requirements of change are built upon in each scenario. On this basis the stations proposed for closure in Option 1 remained the same throughout all the options and the same methodology applied to all the other elements.
- 2.7. The Authority resolved to approve the recommended options for consultation purposes and also to include an additional Option 7 that allowed consultees to mix and match the various elements within the original six Options to give a revised overall outcome.

- 2.8. Prior to commencing the consultation, the Service engaged with the Consultation Institute (a well-established, not-for-profit best practice institute promoting public and stakeholder consultation in the public, private and voluntary sectors). The Institute quality assured the proposed consultation methodology thereby enabling the Service to proceed with confidence and demonstrate to interested parties that independent evaluation had been sought. Subsequently, the Institute has issued the Service with a certificate of consultation readiness which is now attached as Appendix A to this report.

3. CONSULTATION RESPONSES

- 3.1. In total, 3,818 responses were received:

- 3,232 completed questionnaires;
- 205 written submissions; and
- 381 email responses.

In addition, five petitions were submitted with a total of 43,644 signatures opposing the proposals.

- 3.2. Due to the large volume of responses and following public feedback the Service engaged an independent organisation, Opinion Research Services (ORS), to collate and theme the consultation responses.

- 3.3. The full ORS report is available as a background paper to this report. The summary ORS report is attached at Appendix B to this report. This summary themed responses through both the text comments provided on consultation questionnaires and the written responses received by the 6 individual elements. The emerging themes were:

- Negativity around the majority of station closures, mainly due to slower response times
- No strong opposition on the removal of second and third appliances
- Aggregation of options 1-6 may have compounded negativity to other options
- Some limited support for roving vehicles with more information requested on how the model works

- 3.4. It should also be noted that ORS expressed a different view to that expressed by the Consultation Institute regarding the way in which the options were presented. This shows that there are varying professional views on consultation methodology. The Consultation Institute advises that, from its experience, issues likely to be found unpalatable by consultees will inevitably be criticised no matter how any options on those issues are presented. The Service acknowledges that the options were likely to cause an emotional response but nonetheless is confident that the consultation undertaken met the key principles of consultation (also known as the Gunning Principles) and that members of the public, staff and stakeholders were afforded the opportunity to express their views. The views so expressed have been subject to thorough analysis and used to further shape Service thinking.

- 3.5. The Service was keen to support alternative options suggested by staff in line with its vision of 'involving communities and colleagues in designing our services.' The Service was pleased to receive responses that showed an appreciation of the objectives of the proposals whilst supporting pragmatic and realistic alternatives. Key suggestions advanced during the consultation period were:

- For the Service to try all possible options before considering closure;

- To adapt the Whole-time duty system to release resources rather than day crew stations;
- To consider alternative crewing models to keep the appliance available, such as crewing fire appliances with fewer than four riders;
- To replace some larger, traditional fire appliances with smaller Rapid Intervention Vehicles that can be crewed with fewer staff;
- To merge some stations that are close together rather than close them; and
- For staff to be able to volunteer as an alternative to closing a station.

4. HER MAJESTY'S INSPECTORATE OF CONSTABULARY AND FIRE AND RESCUE SERVICES (HMICFRS) REPORT 2018 - 2019.

4.1. In June 2019, HMICFRS undertook an inspection of the Service and publicly reported its finding in December. In relation to the effectiveness and efficiency of the Service's current Service Delivery model, HMICFRS formed the following conclusions:

- The Service should improve the availability of its on-call fire engines;
- The Service should improve performance against its response standards;
- The Service needs to assure itself that its prevention, protection and response resources are allocated to where they have identified the risk; and
- The Service needs to establish if operational crews are productive and used efficiently to support prevention, protection and response activities.

5. EMERGENCY RESPONSE STANDARDS (ERS)

5.1. The Service's current response standard of the first appliance being in attendance within 10 minutes for a house fire and 15 minutes for a road traffic collision was set out in the "Devon and Somerset Corporate Plan 2008/09 to 2010/11" and agreed by the Authority following public consultation. At the time this standard was agreed, it was estimated that around 80% of the population could theoretically be reached within the 10 minute attendance time. This was based on the existing fire station locations and that the fire appliance would be available 24/7. Whilst it was not intended (or indeed possible) to be able to reach everyone within this time period, it was recommended that a single response time for attendance (regardless if a house is in a rural or urban area) be an aspiration; "we should aim to make a first attendance in 10 minutes with all resources arriving within 13 minutes". Appendix C shows the areas where the 10 minute (dwelling fire) and 15 minute (road traffic collision) Emergency Response Standards could be achieved based on existing fire station locations.

5.2. During its inspection, HMICFRS benchmarked performance against other fire and rescue services and it compared the first fire appliance response times. Those services that have been graded as 'good' in the effectiveness category have been able to clearly demonstrate good average response times together with their performance against their agreed response standards (expressed as a target percentage).

5.3. HMICFRS reported that "In the year to 31 March 2018, the Service's average response time to primary fires was 10 minutes and eight seconds. The service's average response time is quicker than the average for other predominantly rural services (10 minutes 32 seconds in year to 31 March 2018)".

- 5.4. However, because the Authority has not set a target percentage performance measure by which it is able to hold the Service to account, HMICFRS reported that the Service only met its response time for the first attending appliance to a dwelling fire incident on 72.4% of occasions and on 75.4% of occasions for Road Traffic Collisions. Compared to other predominately rural services, the Service's performance is good but the absence of an agreed target percentage measure resulted in HMICFRS assessing the Service's performance against 100% of incidents, resulting in the Service receiving a lower performance rating than other fire and rescue services that had lower levels of response times. It can clearly be seen from the ERS map at Appendix C that it is not possible to meet the agreed aspirational response times on all occasions i.e. 100% of the time.
- 5.5. It is therefore recommended that, should the Authority agree to the new Service Delivery Operating Model, the existing response standards should be maintained and that in addition an explicit performance target for meeting the first appliance attendance times for both incident types (house fires and road traffic collisions) on 75% of all occasions should be set. Performance against this measure would then be publicly reported through the Audit & Performance Review Committee.

6. PROGRESS AGAINST INTEGRATED RISK MANAGEMENT PLAN AND FIRE & RESCUE PLAN

- 6.1. Since the public consultation was launched in June 2019 the landscape has changed for the Service:

On-call terms and conditions

- 6.2. Discussions with staff and their Representative Bodies (the Fire and Rescue Services Association (FRSA) and the Fire Brigades Union (FBU) have culminated in an 'in principle' agreement for a new On-call duty system that pays for availability by the hour, enhancing the pay of firefighters. This level of payment has previously been trialled across the Service and the results have shown increased availability of appliances. Academic research validated by the University of Gloucester in September 2019 has indicated that an increased payment would also improve retention of staff. Current levels of staff turnover costs the Service approximately £1.5m each year.
- 6.3. The proposed new 'Pay for Availability' duty system removes the need for a defined level of establishment, i.e. the number of On-call staff required at each fire station. This is because payment by the hour is only for the exact number of firefighters required to crew the fire engines. Staff will have freedom of choice and flexibility in how many hours of cover they provide. The cost of delivering the pay for availability system is therefore dependent upon the number of firefighters required to maintain availability of the specific number of fire engines required at any one time across the Service. Adopting the 'Pay for Availability' duty system would be a large net investment for the Service of £1.8 million (representing a 16% increase to the On-call budget).
- 6.4. However, evidence gained from trials within this Service demonstrated that 'Pay for Availability' significantly improved appliance availability and the emergency response service to our communities. During the trials the average availability of the seven fire engines that were trialled increased from 81.7% to 91.6%, a 10% improvement in availability. This also resulted in a corresponding decrease in risk in those areas. The 'Pay for Availability' duty system is a key enabler for the introduction of a variable, risk-based fire engine availability model that is detailed in section 9 below

Aggregate crewing

- 6.5. Feedback from staff and through research projects indicate that On-call Firefighters want to be available to attend incidents in their area and to have the opportunity to earn more money. The Service is currently in discussions with trade unions for some fire engines to be crewed with fewer than four firefighters to keep the appliance available, with these firefighters being paid the new hourly rate.
- 6.6. The Service has been successfully trialling aggregate crewing at two stations, Porlock since August 2015 and Princetown since Sept 2016, because the firefighters were frustrated by the fire appliance being made unavailable as a result of failure to achieve the minimum crewing level of four firefighters. Since implementation of aggregate crewing, these two stations have increased the availability of the fire appliance by riding with two or three firefighters. During the trial period the fire appliances at Porlock and Princetown were able to attend more incidents (20% Porlock and 30% Princetown). These are incidents that they would not have been able to attend prior to the use of aggregate crewing. While it remains an aspiration to have fire appliances crewed with a minimum of four firefighters it is not always possible to achieve this due to the difficulty of recruiting and retaining sufficient numbers of On-call firefighters, particularly in less populated communities. The FRSA has agreed in principle to adopt aggregate crewing and talks are continuing with the FBU.

Whole-time

- 6.7. The Service has also been discussing possible changes to the existing Whole-time rota system with staff. Whilst the Day Crewing option presented in the consultation is supported by the Authority's Integrated Risk Management Plan, the Service has been discussing an alternative working pattern with representative bodies that could provide more flexibility for firefighters and at the same time release capacity (comparable to the Day Crewing option) to support the delivery of increased prevention and protection work and enhance the emergency response to incidents. Under this alternative working pattern, day duty firefighters would use roving vehicles to carry out work that would increase preventative activities by a minimum 50,000 hours per annum. Although no formal agreement is in place with the FBU at this time, the Service is encouraged by the willingness of the FBU to continue discussions and remains optimistic that a new duty system agreement should be reached by the end of the financial year.

Medium Term Financial Plan

- 6.8. The Authority's Medium Term Financial Plan for 2020-21 identified a potential funding gap of between £5.3m and £7.8m for 2020-21, which included a projected reduction in grant funding of 5% and pension cost pressure of £3.9m. This meant that resources would need to be reallocated to meet risks and invest in key areas of improving On-call availability and Prevention and Protection work.
- 6.9. In December 2019, the Provisional Local Government Finance Settlement showed that grant funding will increase by 1.7% in line with inflation and the Home Office confirmed that the Government will partially fund pension cost pressures, meaning that the overall financial picture has improved for 2020-21.

- 6.10. The effective and efficient delivery of prevention, protection and response services is the most critical element of the Service. Whilst the future remains uncertain, the Service is committed to improving performance through innovative practices such as 'Pay for Availability,' and seeks to fund the investment required by using Reserves in the short-term. Further work will be needed to identify the savings required to fund the investment beyond the short-term and a new Medium Term Financial Plan will be developed as part of the 2020-21 budget preparation to be considered by the Authority in February 2020.

7. **OPTIONS APPRAISAL**

'Do Nothing'.

- 7.1 Whilst doing nothing is an option, it will not address the drivers for change as outlined within the Integrated Risk Management Plan, or the improvements as outlined in the HMICFRS report and is therefore not recommended for consideration.

'Options 1-6' of original consultation.

- Option 1:** Close Appledore, Ashburton, Budleigh, Colyton, Kingston, Porlock, Topsham, Woolacombe
- Option 2:** Option 1 plus Remove 3rd appliances from Bridgewater, Taunton, Torquay & Yeovil
- Option 3:** Option 2 plus Remove 2nd appliances from Crediton, Lynton, Martock & Totnes
- Option 4:** Option 3 plus Day crew Barnstaple, Exmouth & Paignton
- Option 5:** Option 4 plus Move to night cover only on second appliance at Brixham, Chard, Dartmouth, Frome, Honiton, Ilfracombe, Okehampton, Sidmouth, Tavistock, Teignmouth, Tiverton, Wellington, Wells & Williton
- Option 6:** Option 5 plus Introduce 6 roving appliances

- 7.2 Whilst the underpinning risk and evidence presented in the consultation remain valid, it is clear that the extent of station closures and day crewing is not something that many who responded to the consultation wish to see progressed at this stage. Respondents, particularly in more remote communities, were concerned about extended response times and suggested that prior to any changes being agreed, the reliability of the 'On-call' system should be improved. Respondents also suggested that an assessment of other approaches, such as merging of fire stations, should be considered before station closures were made. Discussions with the trade unions have been progressive and the Service remains optimistic that agreement will be reached that will allow for new ways of working to be introduced by the end of this financial year. The agreement will bring about improved availability of our fire appliances, a significant increase in the level of preventative activity and greater emergency response resilience. Consequently, the options 1 to 6 as consulted on are not recommended at this stage.

Option 7

- 7.3 The purpose of consultation is to listen to views and consider alternative approaches. Having done this, a revised model is now presented for consideration by the Authority.

7.4 Given the alternative options put forward by staff and the new ways of working agreed in principle with trade unions, together with the strong feedback from the public and other organisations, the following option has been developed for consideration by the Authority. This can be considered as 'Option 7' as it is made up of components from the June 2019 consultation "mix and match" option. The various elements of Option 7 outlined below will address the risks outlined in the Integrated Risk Management Plan as well addressing many of the areas for improvement identified by HMICFRS in terms of improving efficiency and effectiveness. Future Integrated Risk Management Planning will not preclude any of the original options being brought forward for review.

7.5 Option 7 is derived from the options consulted on and the consultation responses and aims to strike the balance between driving reform and enabling reallocation of resources to risk, specifically providing more prevention and protection activity. The model demonstrates how we have used public responses as part of the consultation– this will build further trust and confidence in the approach when the public and staff are next asked for their views. Effectiveness and efficiency will be improved, as whilst there will be fewer fire stations and fire appliances, those that remain will have better availability and be more resilient. This, in turn, will enhance prevention, protection and response performance. It is anticipated that the improved terms and conditions for firefighters will have a positive impact on the 'People' areas identified in the recent HMICFRS report.

8. OPTION 7 SUMMARY

- Defer the decision to implement day crewing at Barnstaple, Exmouth & Paignton, **subject to** a revised 24/7 crewing model being agreed with the Fire Brigades Union, including roving appliances, before the end of the 19/20 financial year.
- Close Budleigh Salterton fire station and allow affected firefighters to respond from Exmouth fire station.
- Relocate Topsham fire station to Service Headquarters with one fire appliance and relocate one of the fire appliances to Middlemoor fire station (both fire appliances to be relocated to Service Headquarters until an On-call crew can be established at Middlemoor).
- Remove the third fire appliances from Bridgwater, Taunton, Torquay & Yeovil
- Remove the second fire appliances from Crediton, Lynton, Martock & Totnes
- Introduce variable fire appliance availability dependant on risk

9. OPTION 7 DETAIL

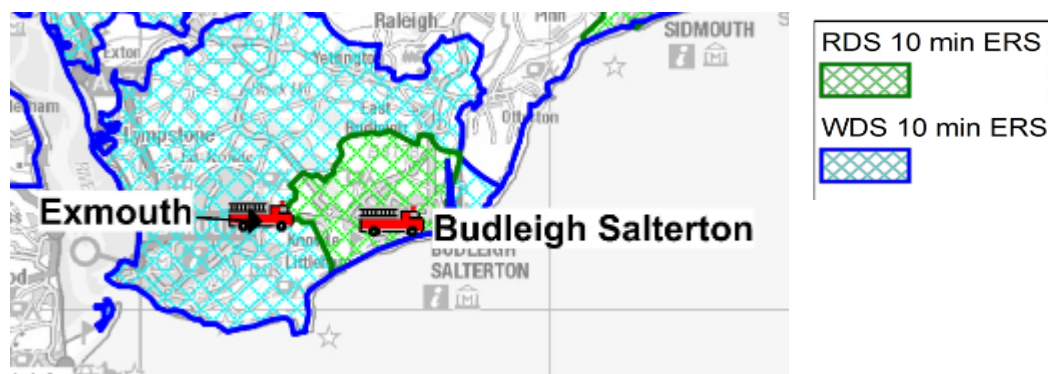
Introduction of new shift/rota instead of moving Exmouth, Paignton and Barnstaple to day crewing.

9.1. Rather than move to a day crewed system for Exmouth, Paignton and Barnstaple, positive discussions with representative bodies indicate that an alternative Whole-time shift and a new Day Duty shift would result in the Service significantly increasing staff productivity in prevention and protection activity. Therefore, any decision to move to a day crewed model can be deferred until the end of the 2019/20 financial year. In the event that it is not possible to reach agreement with representative bodies to a new way of working the option of moving to a day crewing arrangement will be reconsidered post April 2020.

- 9.2. This proposed alternative shift system will improve the productivity of firefighters across the Service and will maintain 24/7 operations at the three fire stations. Response times and risk will be positively affected as increases in preventative work will reduce risk and the increased availability of firefighters during the daytime will provide for improved emergency response resilience at times when On-call availability is at its lowest.
- 9.3. The proposed alternative shift system would also directly support the use of 'roving vehicles'. These roving vehicles would not be additions to the fleet but would be existing vehicles, some of which are those identified 2nd fire appliances that are not risk prioritised during the daytime. This approach, as consulted on, will ensure that additional operational staff are available during the day to respond to emergency calls whilst significantly increasing the volume of prevention and protection activity.

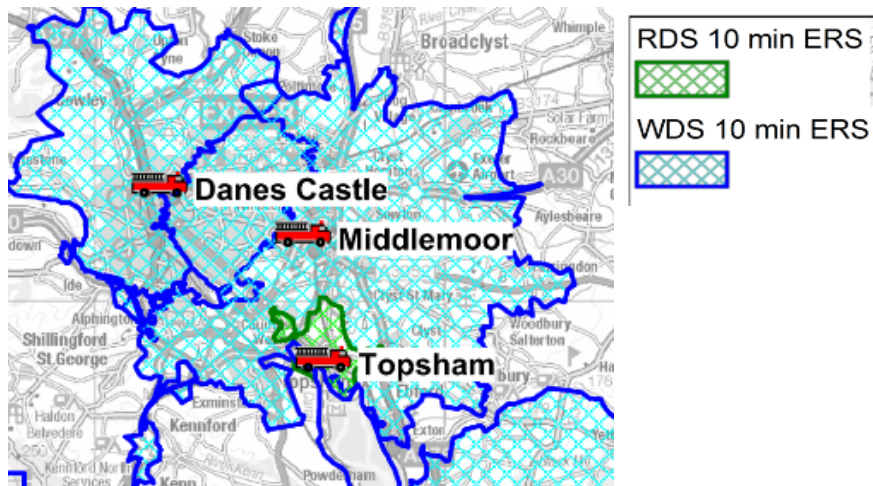
One fire station closure and one fire station relocation

- 9.4. ***Close Budleigh Salterton fire station.*** As the response area for Budleigh Salterton fire station falls completely within the 10 minute emergency response area of Exmouth fire station (see map below), it is proposed that Budleigh Salterton fire station is closed and existing firefighters from Budleigh Salterton respond instead to Exmouth fire station. Under this proposal, the fire station at Budleigh Salterton will be sold and one fire appliance removed. It is not anticipated that this proposal will result in compulsory redundancies being necessary.



(RDS stands for Retained Duty System, now known as On-call. WDS stands for Whole-time Duty System)

- 9.5. ***Relocate Topsham fire station.*** As the response area for Topsham fire station falls completely within the 10 minute emergency response area of Middlemoor fire station (see map below), it is proposed that Topsham fire station site is closed and the appliances and firefighters are relocated. Under this proposal Topsham fire station will be sold and one of the fire appliances relocated to Station 60 (Service Headquarters) in Clyst St George. The other fire appliance from Topsham would be located at Middlemoor fire station (Exeter) as soon as a new 'On-call' crew can be recruited or existing Topsham staff relocated. In the meantime, both fire engines would be located at Station 60. There would be no reduction in the number of fire appliances under this option. Response times during the working week will improve further as 'On-call' Firefighters who work in other roles at Service Headquarters would be able to respond immediately rather than having to travel to the existing Topsham fire station first. It is not anticipated that this proposal will result in compulsory redundancies being necessary.



(RDS stands for Retained Duty System, now known as On-call. WDS stands for Whole-time Duty System)

9.6. **Other Stations:** Appledore, Ashburton, Colyton, Kingston, Porlock and Woolacombe would remain open under this proposal but will be subject to periodic review. The payment for availability for 'On-call' staff that has been agreed in principle with trade unions will improve availability of 'On-call' fire appliances. It is also agreed (with one trade union and discussions ongoing with another) that 'aggregate crewing', where firefighters can be sent to incidents with fewer than four firefighters, be adopted. The decision to defer the closures of these fire stations will be dependent on stations improving their availability, for example by adopting the aggregate crewing model.

9.7. The Service will also share more information with the public on availability at these fire stations to encourage recruitment of additional On-call staff where there are vacancies.

9.8. During the consultation a number of suggestions were put forward relating to potential amalgamation of fire station locations. These will be considered further and any proposals, if appropriate, will be brought forward for separate consultation and decision by the Authority.

Removal of third appliances

9.9. It is proposed that removal of the third fire appliances at Torquay, Bridgwater, Yeovil and Taunton is progressed as originally consulted. The Service will explore further how it might best ensure use of existing staff to support operational incidents where required, rather than reducing the number of firefighters within the Service.

9.10. The removal of four fire appliances means that the Service will not need to buy as many new fire engines in the future to replace them. As a new fire engine costs around £0.3m, this cost will be saved from the fleet replacement programme and further benefits will be realised through reduced servicing and maintenance costs.

Removal of second fire appliances

9.11. Often additional firefighters, not additional fire appliances, are required at larger incidents. Therefore, on many occasions a fire engine is only used to transport firefighters from a fire station to the incident as the amount of equipment available on the first attending vehicles is sufficient.

- 9.12. It is recommended that removal of the second fire appliances at Crediton, Martock and Totnes is progressed, with Lynton's second fire appliance being replaced with a new wildfire 4x4 and All-Terrain Vehicle (ATV). With the exception of Martock, alternative vehicles that can transport firefighters are either in place, or due to be provided in the near future. Should this option be agreed, an additional light vehicle will be provided for Martock.
- 9.13. The Firefighters on the alternative vehicles would be mobilised when available to respond. However, as it is only the first fire appliance at these stations that have been identified as risk prioritised fire appliances, firefighter payment for availability will not be offered for crewing of these alternative vehicles. However, should firefighters make themselves available on a voluntary basis, the full hourly rate will be applied for any incidents that are attended.
- Introduce variable fire appliance availability dependant on risk***
- 9.14. It is recommended that risk-based availability is initially introduced for second fire appliances at the following fire stations: Brixham; Dartmouth; Honiton; Ilfracombe; Okehampton; Sidmouth; Tavistock; Teignmouth; Tiverton; Wells; and Williton.
- 9.15. The risk and the nature of incidents that the Service attends changes throughout the day. Service data shows that during night time hours fires often go undetected for longer and therefore develop more significantly prior to a 999 call being made. When this happens, the Service will often utilise a greater number of firefighters and equipment to deal with incidents. During the daytime hours, people are generally awake and fire is often detected in the very early stages allowing for it to be extinguished before it develops significantly. However, people tend to be significantly more mobile during the daytime, moving from their homes to places of work increasing road related risk. The second fire appliances at these fire stations are often not reliably crewed during the daytime due to On-call staff leaving the communities where they live to undertake their primary employment. The Service proposes to increase the use of these fire appliances by crewing them when required during the daytime hours with roving crews that will undertake preventative activities whilst providing immediate additional emergency response capability.
- 9.16. Where these vehicles are not being used as roving fire appliances, they will remain available at their fire stations and can be crewed by firefighters at these fire stations if they are available to do so. As these have not been identified as risk prioritised fire appliances, firefighter payment for availability will not be offered. However, should firefighters make themselves available on a voluntary basis, the full hourly rate will be applied for any incidents that are attended.
- 9.17. It is also proposed that the second fire appliances at Chard and Wellington remain available to provide additional resilience for Yeovil and Taunton should the Authority agree to remove the third appliances at these locations. Frome's second fire appliance will also remain available due to its distance from other Service fire stations.

10. RISK APPRAISAL

10.1. Existing performance comparison based on all fire appliances being available.

Category	As is	Option 6	Option 7
Risk – Approximate Fire Deaths per year	7.61	7.76	7.65
Risk – Approximate RTC deaths per year	33.14	33.14	33.02

11. OPTIONS APPRAISAL

Category	Do Nothing	Option 6	Option 7
Risk – Approximate Fire Deaths per year	x	✓	✓
Risk – Approximate RTC deaths per year	x	✓	✓
Risk improvement	x	✓	✓
Resources to risk	x	✓	✓
Availability improvement	x	✓	✓
Re-Investment in Prevention and Protection	x	✓	✓
Station Savings (e.g. Rent, Utilities, Vehicle maintenance and equipment, retaining fees)	x	£0.985m	£0.486m
Investment in On-call	x	Not factored into the option at consultation stage	+£2.334m
Net budget impact	-	£0.985m savings	+£1.848m investment
Capital Receipts	-	£0.925m	£0.385m
Capital Savings	-	£4.800m	£4.031m
Aligns to HMICFRS recommendations	x	✓	✓

12. CONCLUSION

- 12.1. The Service has recognised through the Integrated Risk Management Planning process that significant change to the service delivery operating model is required to enable reform and improve our service to the public of Devon and Somerset.
- 12.2. HMICFRS has inspected the Service and identified areas for improvement that support the findings of the Authority's Integrated Risk Management Plan. HMICFRS will be returning in late 2020/early 2021 and will be expecting to see how those areas for improvement have been addressed.
- 12.3. The outcomes of the public consultation have been independently reviewed and have been considered, with the purpose of the consultation to allow the public and staff an opportunity to comment on the proposals and present other ideas as to how the Service may be able to meet those requirements, outcomes and benefits. Option 7 aligns with the Service Vision, in particular 'involving communities and colleagues in designing our services.'
- 12.4. At its meeting on 28 June 2019, the Authority agreed to include an Option 7 for consultation. This gave a valuable opportunity for consultees to respond within the confines of the proposals identified by the Service as meeting the Integrated Risk Management Plan requirements, mixing and matching the elements to allow the public to influence the outcomes. The options appraisal section of this paper reflects that feedback and demonstrates that implementation of a revised set of proposals based on those elements that have been subject to consultation will satisfy the risks identified in the Integrated Risk Management Plan, many of the HMICFRS findings and the objectives of the Fire and Rescue Plan.
- 12.5. The adoption of Option 7 will result in the following benefits, helping us become 'Safer Together:'
- An efficient, effective delivery model that actively reduces community and commercial risks whilst improving the response to emergencies;
 - Improved fire appliance availability;
 - Increased flexibility, reward, recruitment & retention of the On-call workforce;
 - A choice of duty systems for Whole-time staff;
 - Cultural reform;
 - Increased productivity; and
 - Increased public safety

LEE HOWELL
Chief Fire Officer

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The
Consultation
Institute

Certificate of Consultation Readiness

For Pre-Consultation of

Safer Together

Devon & Somerset Fire & Rescue Service

Nicholas Duffin

On behalf of the Consultation Institute

October 2019

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**DEVON &
SOMERSET**
FIRE & RESCUE SERVICE

Safer Together Programme: Service Delivery Model

Independent Analysis of Findings

Opinion Research Services

December 2019



Devon & Somerset Fire and Rescue Service

Safer Together Programme: Service Delivery Model

As with all our studies, findings from this report are subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of the findings of this report requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation

This study was conducted in accordance with ISO 20252:2012 and ISO 9001:2008.

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1. Executive Summary

Introduction

- ^{1.1} Following a short Engagement Phase in the early summer of 2019, DSFRS conducted an extensive Formal Consultation programme about its proposals for wide-ranging changes in fire cover across both counties over a 12-week period from July 3rd to September 22nd. The consultation focused mainly on six proposed options for emergency cover across Devon and Somerset, but an open-ended seventh option was also included to allow respondents to suggest alternative combinations of any of the elements included in options 1-6. The seven options were presented to the public as:

Option 1 – Station closures [proposed for eight stations]

Option 2 – Station closures *and* removal of all third fire engines [the removal of all third fire engines would affect four stations]

Option 3 – Station closures, removal of all third *and* some second fire engines [the removal of some second fire engines would affect four stations]

Option 4 – Station closures, removal of all third and some second fire engines *and* change of status to day crewing [the day-crewing change would affect three stations]

Option 5 – Station closures, removal of all third and some second fire engines, change of status to day crewing, *and* change of status of second fire engine to on-call at night only [the night-time on-call proposal would affect 14 stations]

Option 6 – Station closures, removal of all third and some second fire engines, change of status to day crewing, change of status of second fire engine to on-call at night only, *and* introduction of day-crewed roving fire engines

Option 7 – Mix and match option, to include any combination of the elements used in the other options.

- ^{1.2} ORS was appointed by DSFRS to review the consultation outcomes and methods because of our experience of statutory consultations in general, and with most of the UK fire and rescue services. ORS had no part in the design and implementation of the consultation programme, so we may comment on an independent basis.

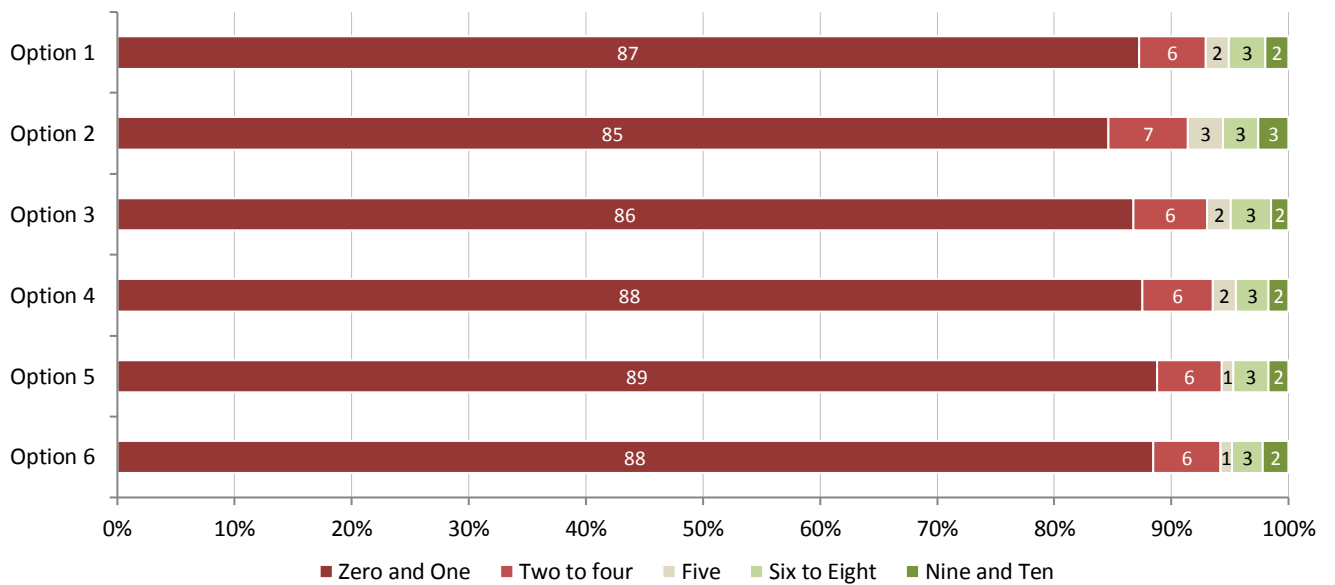
Consultation outcomes

Questionnaire

- ^{1.3} In total, 3,818 responses were received from the public: 3,232 completed questionnaires, 205 written submissions and 381 email responses. In addition, five petitions were submitted with a total of 43,644 signatures opposing the proposals.

- 1.4 Most responses to the questionnaire were from respondents identifying themselves as individual members of the public or DSFRS staff, but a significant number of organisations and other types of respondent also submitted their views via the questionnaire. In total, at least 94 organisations and other types of respondents submitted questionnaires.
- 1.5 The questionnaire invited respondents to assess or score the main six options on a zero to ten scale, where zero meant ‘poor’ and ten meant ‘excellent’. The chart below shows that responses were overwhelmingly critical.
- 1.6 Overall, 95% of respondents (nineteen out of twenty) clearly opposed all six options, with scores of ‘zero’ to ‘four’, and nearly nine in ten gave scores of ‘zero’ or ‘one’. Only 5% respondents gave scores of ‘six’ to ‘ten’. Many respondents gave the lowest possible score of zero.

Scores for the main six Options on a 0 to 10 scale (0 is “poor” and 10 is “excellent”)



Scores of zero and 1 (“Poor”) are shown in deep red; scores of two to four are in paler red; scores of 5 (the intermediate point) are shown in beige; scores of six to eight are shown in light green; and scores of 9 and 10 (“Excellent”) are shown in deep green.

- 1.7 The reasons for these uniformly critical outcomes result are reviewed later in this executive summary and in the final chapter of the full report, called *Consultation Programme Reviewed*.

Questionnaire Text Comments

- 1.8 The questionnaire contained multiple open-ended questions where respondents were invited to write at length about their reasons for their opinions of the options. Overall, 2,487 respondents made text comments about option 1 and most of those also commented at length on all the other options. The most common comments expressed were general disagreement with all the proposed station closures, based on:

Increased community risk – especially in rural areas

Danger to life and property

Slower response times – especially in rural areas

Reduced resources – less resilience

Increased pressure on the remaining emergency cover resources – particularly because the fire and rescue service does much more than just fight fires

Seasonal variations in population and risks due to tourism

Thatched, historical and heritage dwellings and buildings

Criticisms of DSFRS's risk assessments and performance data

Concerns that council tax payers would get a much-reduced service.

- 1.9 There was particular textual support for Porlock station (but, by implication, all the stations were supported in the questionnaire's quantitative findings).
- 1.10 Most respondents made critical comments about options 2 to 6, but it is difficult to assess the variations in levels of opposition to the specific changes because responses were dominated by people's concerns with option one.
- 1.11 However, there was some limited textual support for the removal of second and third appliances where these could be shown to be under-used or under-staffed; and some people wrote that they could support removing engines if this was an alternative to station closures. A few respondents wrote that converting these engines to roving vehicles would be more acceptable than removing them completely.
- 1.12 There was some variation in textual views about the proposed crewing changes under options 4 and 5, but it is difficult to quantify because the inclusion of option 1 in all the other options affected what people said. Most respondents were critical. There was also more opposition than support for option 6, day-crewed roving fire engines; but 186 respondents (9% of those commenting on option 6 in the questionnaire) would like more information on this option.
- 1.13 The questionnaire's invitation to suggest 'mix and match' combinations of elements in option seven prompted a very diverse range of specific and detailed ideas. Some respondents put forward quite technical arguments for DSFRS's consideration. However, there was no particular 'mix and match' option that stood out as having substantial support.
- 1.14 Most of those making comments said the proposals would impact them (or their contacts or their communities) adversely by increasing risks. Respondents' textual comments strongly supported the firefighters; some would prefer cuts in management and support services (rather than front-line resources), and better recruitment and retention policies.
- 1.15 There were some questions about how the proposals would impact education and prevention work; why the changes were not being piloted on a small scale before their general introduction; and why some other (allegedly under-performing) fire stations had not been included in the proposals.

- 1.16 The questionnaire comments on the consultation reflected the difficulties of doing a single, counties-wide consultation on such a range of local proposal, namely that: information is missing or misleading; the aim is to save money not make the counties safer; and DSFRS has already made up its mind. Some said the questionnaire was difficult to complete, probably because of the large number of open-ended text questions.
- 1.17 Overall, while the position cannot be quantified clearly, there were indications that members of the public and other stakeholders could consider some of the options two to six more sympathetically, if only they were detached from option 1.

Submissions

- 1.18 During the consultation, 205 written submissions were received from residents, staff, organisations and other stakeholders, with the greatest response coming from Ashburton, North Devon (specifically Woolacombe and Barnstaple), Porlock and Colyton. The shorter submission have been analysed for their recurrent themes while the longer ones are summarised. There were also 381 email submissions. It is impossible to do justice to the length and argumentative detail of the submissions in a brief summary here, so readers are referred to the later parts of this report and the appendices where they are analysed in detail.
- 1.19 Almost all the submissions opposed the proposals, the most common reasons for opposition being about increased risk to the public and firefighters, concerns for the safety of rural communities and vulnerable people, reduced resilience and criticisms of DSFRS's risk assessments and data.
- 1.20 In the submissions, there was greater opposition to the closure of stations at Ashburton, Porlock, Woolacombe and Colyton than elsewhere, and a wide range of specific local hazards were cited, including (for example) Exmoor and Dartmoor environments, local industry, fast roads with RTCs, and poor access to some places.
- 1.21 Relatively few letters opposed the removal of third fire engines at Torquay, Bridgwater and Taunton, but there were rather more regarding Yeovil because of population growth, the number of college students and attendance times for military or commercial or industrial incidents.
- 1.22 There was opposition to second fire engines moving to night-time on-call because of increased risk, due to new housing (Chard, Tavistock, Wellington, Wells), the loss of specialist equipment to reach high buildings (Ilfracombe) and the number of heritage buildings (Wells). Respondents also highlighted deprived higher risk communities in Frome and Teignmouth and at the Glastonbury Festival. Fewer engines during the day will increase response times and risk to local populations and institutions and businesses.
- 1.23 The main reasons for opposing the removal of second fire engines from some stations were: the loss of specialist appliances suited to local circumstances, tourist numbers, remoteness of communities, and reduced resilience resulting from the combined impacts of the different proposals.
- 1.24 Consultees opposed the change of status of second fire engines to day crewing at Barnstaple, Exmouth and Paignton due to their increasing populations and the number of institutions, industrial and commercial buildings, and schools, all of which will put extra pressure on retained firefighters.

- 1.25 Many submissions said DSFRS's risk assessments were deficient since only 'station ground' fires and RTCs had been taken into account in the statistical modelling, and that new housing, tourism and traffic congestion had not been considered sufficiently. Climate change (in relation to increasing numbers of moorland fires and flooding) was also mentioned frequently as a reason for maintaining existing resources.
- 1.26 Very few consultees could see evidence of DSFRS's intention to improve the service and said the real aim is to cut costs despite the increased risk this presents. Some argued for an increase in investment in DSFRS and others for challenging and lobbying Government against cuts in FRS budgets. There were some severe criticisms of the increase in management and support staff numbers and costs.
- 1.27 Many respondents criticised the consultation data, the complicated consultation document and questionnaire, and DSFRS's consultation events for poor venues, poor timing and limited community involvement.
- 1.28 Much longer and more detailed submissions were received from the following organisations: Fire and Rescue Services Association; Fire Brigades Union; Colyton Fire Station; Kingston Firefighters; Topsham Firefighters; Serving Fire Officers; Somerset County Council; North Devon Healthcare Trust; Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly; National Trust (South Somerset); Dartmoor National Park and Dartmoor Commoners' Council; Exmoor National Park.
- 1.29 There were also some notable and reasoned submissions from individuals. In general, the contributions from the fire service unions were more critical of the proposals and DSFRS's risk assessments than those from most other stakeholders and the public. From the many submissions, it is clear that DSFRS has not yet won the confidence of the public or many of its stakeholders about its purpose, its data, its risk assessments and its proposals.

Petitions and Standardised Submissions

- 1.30 Various petitions were organised during the consultation and this chapter reviews all those of which DSFRS and ORS is aware. The total number of signatures across five petitions was 43,644. Each of the petitions is reviewed in detail later in the report.
- 1.31 The largest petition, organised by the Fire Brigades Union (FBU) and entitled 'Don't cut fire services in Devon and Somerset', attracted 30,294 signatures. The petition statement said the proposals would put firefighter and public lives at risk, while concisely summarising the main proposals and naming the affected stations.
- 1.32 Two petitions to 'Save Colyton Fire Station' were signed by 7,475 people (1,384 online and 6,091 on paper). A petition against the proposed closure of Porlock Fire Station was signed by 4,818 people. (1,231 signatures were handed to DSFRS staff at a consultation event in Porlock, and 2,567 people signed a paper copy.) A further 1,020 people signed the petition online and also made a large number of detailed comments on reasons against the closure. 544 people signed an online petition objecting to DSFRS's proposals for Kingston Fire Station, 69 of whom made textual comments about why the station should be kept open.

- 1.33 An online petition was organised by the Torbay Liberal Democrats and was signed by 513 people. There was also a standardised submission organised by a local Labour Party protest group and signed by 102 people.
- 1.34 Petitions and standardised submissions are clearly important in indicating public anxiety about important aspects of the 'Safer Together' proposals and so DSFRS must treat them seriously. Nonetheless, they can exaggerate general public sentiment if organised by motivated opponents; and in this case there were considerable campaigns about the proposed changes to fire services. However, DSFRS's own presentation of the options probably had as big an effect on public opinion as the campaigns, as the following review of the consultation shows.

Consultation Principles

- 1.35 The good practice requirements for consultation are expressed in the so-called Gunning principles - namely that consultation should:
- Be conducted at a formative stage, before decisions are taken;
 - Allow sufficient time for people to participate and respond;
 - Provide the public and stakeholders with enough background information to allow them to consider the issues and any proposals intelligently and critically; and
 - Be properly taken into consideration before decisions are finally taken.
- 1.36 The best way of fulfilling the first of the four Gunning Principles, that consultation should be done at a formative stage, is to conduct a two-stage consultation. The first phase should be an open-ended consideration of the issues, to assist the Authority to formulate its ideas and options; the second stage is then called formal consultation on the resulting proposals.
- 1.37 In this case, we understand that DSFRS conducted an engagement phase consisting of an online questionnaire (with 82 respondents), four focus groups (with a total of 49 members of the public), and an Options Workshop (with three members of the public, four DSFRS staff and one FBU representative). It is also important that no implicit decisions are taken before the formal consultation has been completed and properly considered, and we believe that is the case here.
- 1.38 The 12-week formal consultation period was conscientious in its length and in promoting the consultation through all the following: wide-ranging effective publicity; an accessible open questionnaire; and 27 local drop-in sessions that were attended by many senior officers and staff, and provided detailed information on the local proposals.
- 1.39 The Fire Authority will know that the fourth Gunning requirement, that consultation outcomes should receive due consideration, is particularly important in this case, given the scale of opposition to the six main options.
- 1.40 Yet consultations are not referenda, they are not numbers games in which proposals must be 'popular' to be legitimate and rationally defensible. The key issue is not about levels of support or opposition, but about the cogency of the reasons and evidence for and against the proposals. The popularity or

unpopularity of proposals should not displace professional and political judgement about what is the right or best decision in the circumstances and in the light of all the evidence available.

Understanding the Levels of Opposition

Introduction

- 1.41 The consultation done by DSFRS on behalf of the Fire Authority was extensive and conscientious in its scale, scope, accessibility and honesty in clearly stating its proposals. Public authorities are not always so conscientious in disclosing the scale and scope of their proposals. Changes to emergency cover arrangements are always likely to be criticised, but it seems that in this case there were factors that increased the level and intensity of the opposition to particularly high levels.

Six Options

- 1.42 Perhaps most importantly, the presentation of the six main options as essentially ‘interconnected’ worsened their reception by ensuring that they were all judged by the standards of the most unpopular. (The presentation of the options is shown in paragraph 1 at the top of this chapter.)
- 1.43 For example, the closure of eight fire stations (option 1) might be expected to be the most unpopular proposal, whereas the removal of the third fire engine from four stations (*part of* option 2) would be less unpopular. However, these two proposals were presented together as a ‘package’, so they could not be judged separately by respondents.
- 1.44 The problem was that DSFRS’s option 2 (removal of third fire engines) also included option 1 (closure of eight fire stations); its option 3 included both options 1 *and* 2; its option 4 included options 1 *and* 2 *and* 3; and so on. Therefore, the most unpopular option 1 (closure of eight fire stations) was included as an integral part of all the other five options. This presentation meant that if respondents disagreed with option 1 (closure of eight fire stations) (as most of them clearly did), then they were logically committed to disagreeing with all the other options, because each of them contained the proposal to close the fire stations.
- 1.45 Yet had the different elements of each option been presented separately, respondents could have judged them separately, without being logically committed to rejecting them all because they disliked one or more elements. Ideally, the options should have been treated like this, with a response scale for each option:

To what extent do you agree or disagree with each of the following:

Station closures

Removal of all third fire engines

Removal of some second fire engines

Change of status to day-crewing

Change of status of second fire engine to on-call at night only

Introduction of day-crewed roving fire engines

- 1.46 That approach would have allowed the relative acceptability or unacceptability of each element to have been assessed (which is not possible when they are packaged together like Russian Dolls).
- 1.47 As well as stopping respondents judging each element separately, the packaging of the options implied to many respondents that DSFRS is determined to close the designated fire stations, since that proposal was included in all six main options.
- 1.48 Quite rightly, the Fire Authority added a seventh ‘mix and match’ option in which respondents were invited to select any of the elements from across the six options. That was a worthy and good idea, but in this context it meant that (counting station-by-station and fire-engine-by-fire-engine) the six options comprised at least 35 individual proposals – so most respondents found the ‘mixing and matching’ exercise daunting, and no particular strategy emerged from the many open-text responses (though some respondents put forward quite technical arguments for DSFRS’s consideration).
- 1.49 The Fire Authority will probably wish to take these factors into account in considering the critical outcomes of the consultation.

Open questionnaire

- 1.50 DSFRS rightly used an open questionnaire as a central feature of its consultation, because such an approach is inclusive in giving everyone an accessible opportunity to respond if they wish. However, there are two main points about the effect of the consultation questionnaire that the Fire Authority will also probably wish to consider in order to understand the findings in context.
- 1.51 The first is that the questionnaire was conscientious, but also demanding on potential respondents in including nine open-ended text questions. It is not a criticism, but simply a fact of life that the inclusion, in the printed version, of nine almost-blank A4 pages where respondents were asked to explain their ideas for each option was a daunting prospect for many potential respondents.
- 1.52 While the number of open-ended text questions will have reduced the number of respondents, the interconnectedness of the six options led most of those who responded to write lengthy, repetitious comments on each of nine pages, focusing usually on their least-liked option – thus making it impossible to assess the relative levels of support for the different elements of the six options.
- 1.53 It is not a criticism to note that an open questionnaire is not a representative survey of public opinion. The Fire Authority will know that, typically, open questionnaire respondents are more likely to be both more motivated and more critical of proposals than the general population.
- 1.54 Of lesser importance is that the questionnaire used a numerical 11-point response scale (from zero for ‘Poor’ to 10 for ‘Excellent’) when a five-point scale (Very poor / Fairly poor / Neither good nor poor / Fairly good / Very good) would have been more balanced, simpler and familiar to respondents.

Drop-in sessions

- 1.55 DSFRS was right to recognise that public meetings are not normally a constructive way of achieving effective consultation. Instead, therefore, the Service was extremely conscientious in running 27 Drop-in Sessions across a wide range of locations, including the areas most affected by the proposals. Plenty of senior officers (including the top two tiers) and other staff attended and conversed readily, at length

and in-depth with attendees. There was also plentiful information available at the venues to enable members of the public and stakeholders to understand the rationale for the proposals. Some of the meetings were ‘difficult’ due to the numbers attending and their keenness to challenge the proposals; but others were thoughtful and deliberative.

- 1.56 Once more, it is not a criticism but a fact of life that it is difficult to take achieve an organised way of taking feedback systematically and anonymously in such meetings; so it is not known whether those attending the 27 events were afterwards more likely or less likely to approve the proposals.

Counties-wide approach

- 1.57 The Fire Authority and DSFRS were conscientious in conducting a counties-wide consultation exercise across Devon and Somerset. However, this worthy approach seems to have elicited an unremitting campaign of opposition by the unions and others, and to have raised public concerns which it was hard for DSFRS to counteract effectively, at least in a measurable way in the open questionnaire responses.
- 1.58 For example, the conscientious counties-wide approach meant that it was not possible for the single consultation document to carry sufficient local data (for about 35 separate proposals) to be convincing to potential critics – which meant that it was easier for campaigning opponents to galvanise opposition to the proposals.
- 1.59 Of course, as we have said, there was plenty of detailed local information in each of the 27 drop-in sessions, but it was nonetheless hard to communicate the relevant data widely. While a counties-wide approach was not ‘wrong’, with the benefit of hindsight, it might have been better to conduct more local and focused consultations in the affected areas.

Way forward?

- 1.60 For the reasons explained, the consultation outcomes show a stark 95-to-5 ratio of opponents to supporters, not only in relation to the closure of eight fires stations but for all six options. While consultations are not referenda, these findings are very striking and unusually critical.
- 1.61 One difficulty is that there is little coming from the consultation to provide a more balanced picture of general public opinion: with the benefit of hindsight, deliberative consultation and scrutiny through representative forums or focus groups and/or a representative residents’ survey could have provided additional valuable information about public perceptions and the acceptability of the proposals when fully explained.
- 1.62 Therefore, Fire Authority and DSFRS are faced with difficult decisions following this consultation’s outcomes. There are reasons to implement the proposals; yet the Authority should assess its reputation risk, and the of possibility of legal challenges, given the outcomes.
- 1.63 Overall, the Fire Authority should consider how the methodological issues we have highlighted have magnified opposition to the proposals while also considering how its proposals could be amended to make them more acceptable.

- 1.64 There is no single ‘right’ approach, but on balance ORS recommends that it would be wise to prioritise the proposed changes and then to subject them to scrutiny in sequence through more local and focused deliberative and/or representative consultations in the affected areas.

Main recommendations

- 1.65 Therefore, at this stage and for the reasons given above, we recommend that DSFRS and the Fire Authority should:

Consider the consultation outcomes in depth while noting how some features of the consultation exercise have magnified opposition;

Rethink, prioritise, and re-present its key proposals in a more graduated way;

For each proposal, target further consultation more locally in the affected areas using several shorter and more location-specific consultation documents;

Continue *not* to use public meetings as key parts of the consultation, but to be prepared to attend ones organised by other bodies, albeit only in a ‘listening mode’;

Continue to use an open questionnaire, but also seek ways of eliciting general public opinion – to compare one with the other;

Recognise the advantages of using representative and independently facilitated deliberative forums, workshops and focus groups as the best way of giving controversial proposals a ‘fair hearing’ and comparing people’s ‘before-and-after’ opinions; and

Consider whether it would be appropriate to conduct a representative survey based on proper sampling.

2. Consultation Questionnaire

Introduction

- 2.1 A consultation document outlining the issues under consideration was produced by DSFRS, who also developed a consultation questionnaire intended to elicit views on the proposals. The questionnaire provided various opportunities for respondents to comment on the proposals in their own words and also contained questions to collect demographic information about those taking part.
- 2.2 The consultation document and questionnaire were made available via the DSFRS website between 3rd July and 22nd September 2019 (the duration of the consultation period). Paper versions were also made available on request for those who were unable to fill in the questionnaire online, and additionally there was an ‘easy read’ version.
- 2.3 The questionnaire data obtained by DSFRS was provided to ORS for analysis and reporting. The following chapter is based on the 3,232 usable responses that were received.

Profile of respondents

- 2.4 The table below provides details of the profile of respondents to the consultation questionnaire, by age, gender and the type of respondent (i.e. whether they were responding as a member of the public, as a member of DSFRS staff, or in some other capacity e.g. on behalf of an organisation or in their capacity as some sort of elected representative, and so on).
- 2.5 In practice, the profile of respondent types is difficult to summarise exactly because of the way the online questionnaire was setup with additional text boxes. This meant, for example, that a few respondents identified themselves as members of the public, but then subsequently made comments that implied they may be responding on behalf of an organisation, or at least claiming to reflect the views of a wider group. In the interests of providing as inclusive a list as possible, all organisations that were mentioned have been listed in the table below.

Table 1: Profile of consultation questionnaire respondents

Characteristic		All Responses	
		Number of Responses	% of Valid Responses
BY AGE	Under 18	17	1%
	19 to 24	75	3%
	25 to 34	299	11%
	35 to 44	425	15%
	45 to 54	506	18%
	55 to 64	581	20%
	65 to 74	642	23%

	75 to 84	239	8%
	85 or above	54	2%
	Total valid responses	2,838	100%
	<i>Not known</i>	394	-
BY GENDER	Male	1,285	48%
	Female	1,379	52%
	Other	4	*
	Total valid responses	2,668	100%
	<i>Not known</i>	564	-
COMPLETING THE QUESTIONNAIRE AS...	Member of the public	2,698	88%
	DSFRS staff or volunteer	261	9%
	Other or organisation	94	3%
	Total valid responses	3,053	100%
	<i>Not known</i>	179	-

^{2.6} A number of organisations opted to submit their responses via the consultation questionnaire. These are listed below, along with organisations mentioned as part of responses submitted by those identifying as individuals.

Table 2: List of organisations responding as part of the questionnaire

TYPE	NAME OF ORGANISATION
Town and Parish Councils	Axminster Town Council
	Belstone Parish Council
	Bigbury Parish Council
	Bishops Hull Parish Council
	Buckland in the Moor Parish Meeting
	Carhampton Parish Council
	Chawleigh Parish Council
	Christow Parish Council
	Colaton Raleigh Parish Council
	Cutcombe Parish Council
	Diptford Parish Council
	Exford Parish Council
	Exmoor Parish Council
	Fremington Parish Council
	Harberton Parish Council
	Holbeton Parish Council
	Ilsington Parish council
	Kingsbridge Town Council
	Kingsbury Episcopi Parish Council
	Langford Budville Parish Council
Luccombe Parish Council	
Luxborough Parish Council	
Lynton and Lynmouth Town Council	

	<p>Martock Parish Council Modbury Parish Council Monksilver Parish Council Mortehoe Parish Council North Curry Parish Council Pawlett Parish Council Peter Tavy Parish Council Sampford Arundel Parish Council Selworthy and Minehead Without Parish Council Stockleigh English Parish Meeting Stogumber Parish Council Tavistock Town Council Wellington Town Council West Monkton Parish Council Winsford Parish Council Withypool & Hawkridge Parish Council Wootton Courtenay Parish Council Yealmpton Parish Council</p>
<p>Others (including individuals responding in their official capacity e.g. elected representatives)</p>	<p>Abbeyfield Porlock Society Allerford and Selworthy Village Hall Management Committee Allhallows Ltd Bigbury Neighbourhood Plan Steering Group Bridgwater & District Trades Union Council Brunel Manor Can Do Pub Co. Ltd Castle Nursing Home, Bampton Dunster & Porlock Surgery Patient Participation Group / Friends Of Porlock Surgery Exmoor Natural History Society Exmoor Society, Coastal Group Kingston 54, Devon and Somerset Fire and Rescue Service Langford Budville Village Hall Leonardo Helicopters UK Ltd Neil Parish MP National Trust: Dunster Castle & Gardens North Devon Labour Party Patients' Group in Lynton Rousden Owners & Residents Association St Dubricius Anglican Church Taunton and West Somerset Trades Council Unnamed local business Unnamed organisation that represents people living with dementia and other memory problems, and their carers West Somerset Flood Group</p>

Interpretation of the Data

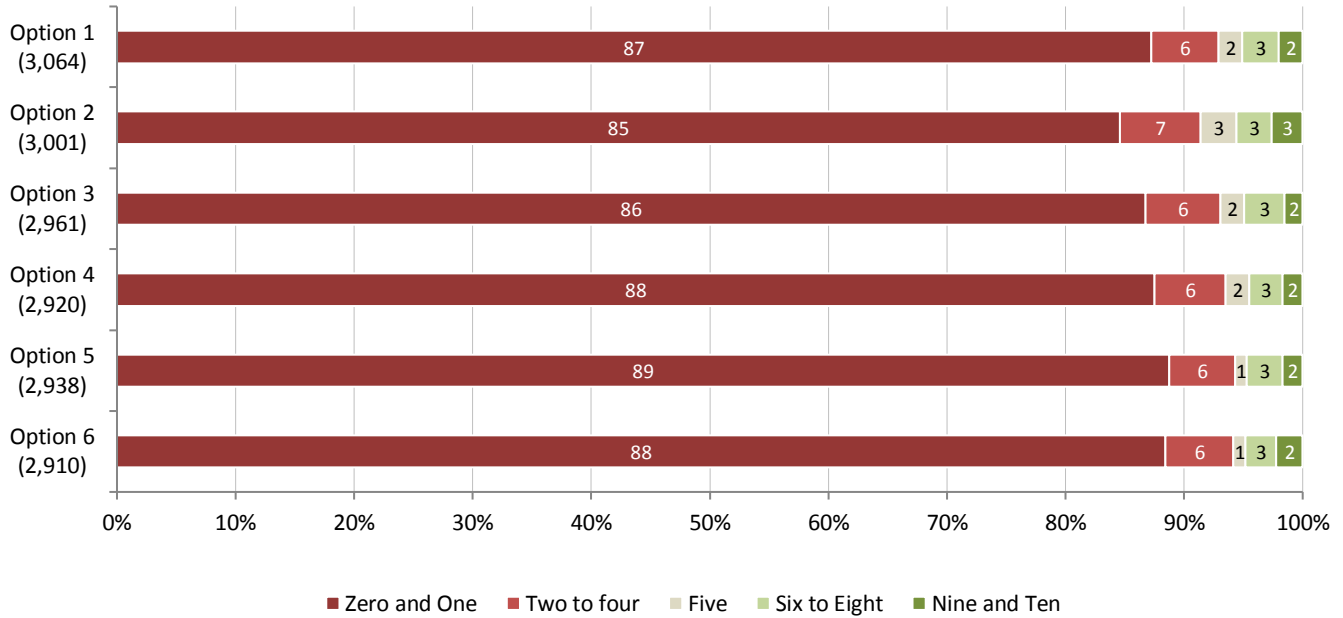
- 2.7 The chart showing the scores given to each option has been coloured with a ‘traffic light’ system, where red shades represent negative responses (i.e. scores less than five), green shades represent positive responses (i.e. scores higher than five) and beige represents a neutral score (i.e. the mid-point of five). The bolder shades are used to highlight responses at the ‘extremes’, i.e. closer to zero or to ten.
- 2.8 Where percentages do not sum to 100, this may be due to computer rounding, the exclusion of “don’t know” categories, or multiple answers. Throughout the volume an asterisk (*) denotes any value less than half a per cent. In some cases figures of 2% or below have been excluded from graphs.
- 2.9 For each option, the questionnaire gave respondents the opportunity to provide written comments about any elements of the option they did or not favour, and the reasons why.
- 2.10 In practice there was considerable duplication across the various text questions, primarily because of the ‘escalating’ nature of the options (with the proposals in Option 1 also forming part of Options 2 to 6, and so on). In addition, the inclusion of Option 7 (the ‘mix and match’) provided almost unlimited scope for respondents to suggest very detailed or specific, bespoke alternatives. As such, the design of the questionnaire and of the FRS’s options makes it very difficult to provide a concise summary of the comments.
- 2.11 Nonetheless all open-ended responses have been read, and then classified (coded) as far as possible using a standardised approach (code frame). This approach helps ensure consistency when classifying different comments and the resulting codes represent themes that have been repeatedly mentioned in a more quantifiable manner.

Summary of consultation questionnaire findings

Scoring the proposed options

- 2.12 The questionnaire invited respondents to indicate the extent to which they felt the option was “a good solution for the people of Devon and Somerset”, by scoring the options against a zero to ten scale. A score of zero indicated that the option was ‘poor’, and a score of ten that it was ‘excellent’.
- 2.13 The scores accorded to each option are summarised in the chart below. As can clearly be seen, respondents were emphatically negative on the whole, with a high proportion of respondents (almost nine out of ten, depending on the Option) giving a score of ‘zero’ or ‘one’ and only very small proportions (either 2% or 3%, depending on the Option) giving scores of ‘nine’ or ‘ten’.
- 2.14 In fact, across all six Options, more than four fifths of those who responded gave the very lowest score of zero, and only 5% or 6% (depending on the Option) gave a score above the mid-point of the scale i.e. higher than five.

Figure 1: Consultation questionnaire scores for the seven Options (based on a scale of zero to ten, where a zero is ‘poor’ and a ten is ‘excellent’)



Open-ended comments about the proposed options

- 2.15 The most widely raised themes were expressions of general disagreement and/or of particular concerns about the proposal(s): these were expressed by a majority of respondents who commented - across all questions. More specifically, the main concerns expressed were around increased risk and danger to life, and slower response times (due to increased pressure on the remaining FRS etc.). Other common concerns were around the rurality of the area; population growth and particularly seasonal fluctuations in more areas that attract more tourists; the enhanced risk associated with high numbers of historic and/or thatched buildings; and the fact that the fire service’s remit is much wider than merely dealing with fires.
- 2.16 While very large proportions of those who commented opposed any form of closure whatsoever, others mentioned specific stations that they would like to see remain open: in particular, 373 respondents (15% of those who commented on Option 1) specifically said they did not want Porlock to close, with smaller numbers mentioning the other stations identified for closure under Option 1 (it is worth remembering, however, that most respondents expressed their approval in very general terms e.g. by opposing any service reductions; therefore even though some locations were mentioned less frequently, this need not imply that respondents were ambivalent about particular local stations).
- 2.17 Overall, most also made negative comments about the remaining Options i.e. 2 to 6. However, it is difficult to assess levels of support and/or opposition about the principles of removing second and third appliances, making crewing changes and introducing roving appliances, in a very quantifiable way – because of the way that the single most controversial element of the proposals (i.e. station closures) was included in all of these options, and many respondents were not always specific about whether they were agreeing or disagreeing with all the elements of the Option to the same extent.

- 2.18 Among those who did comment more specifically about the removal of second and third appliances under Options 2 and 3, there was some difference of opinion. Some supported the removal of equipment where it was underused or understaffed, while others indicated they would be more likely to support removing engines if this was an alternative to closures. However, others simply felt that this was too dangerous to consider (i.e. as it would reduce the amount of available ‘back up’ for responding to incidents). A small number of respondents suggested that converting these engines to roving vehicles might be seen as more acceptable than removing them completely.
- 2.19 Similarly, some differences of opinion were expressed as the suitability of the proposed crewing changes under Options 4 and 5 (although again, it is difficult to quantify because the most controversial aspect of the proposals formed part of every option). In general, however, more respondents made negative comments than made positive comments (considerably more, if taking into account the numbers that commented generally about their perceived concerns about a reduction in service, without specifically mentioning on-call crewing at night and the change of status to day crewing).
- 2.20 In terms of Option 6, more disagreed than agreed with the introduction of day-crewed roving fire engines. However, it is worth noting that quite a number of respondents (186; 9% of those commenting) felt that more information was needed about how these would be implemented and about what the possible implications could be.
- 2.21 As mentioned above, there was considerable scope for respondents to put forward very detailed and specific alternatives via the ‘mix and match’ open-ended question. These are summarised (as far as possible, given their range and complexity) later in the document.
- 2.22 Respondents were also asked if they thought they personally, someone they knew, or their community would be impacted by the proposals, and the vast majority (97% of respondents) said that at least one of these would be impacted. When asked to elaborate via a further open-ended question, most reiterated the types of concerns that had been raised earlier in the questionnaire e.g. increased risks for particular localities, such as rural areas, and a general increase in danger to life caused by a reduction in the service.
- 2.23 One final open-ended question invited respondents to include any further comments they wished to make. Many reiterated the concerns they had expressed earlier in the questionnaire e.g. their concerns about the safety of the proposals. A summary of the main other points that were raised (particularly in response to this question, but also elsewhere in the questionnaire) is included below:

Other open-ended comments about the consultation process

- 2.24 The main criticisms made of the consultation included claims that:
- » The statistics and data used in the consultation document are inaccurate or misleading;
 - » Not enough information has been provided;
 - » The true purpose of the consultation exercise is merely for DSFRS to
 - » save money, not to improve safety; and

- » DSFRS has already made up its mind to proceed with its proposals and the consultation is therefore just a ‘tick box’ exercise.

2.25 Fewer respondents made various other criticisms of DSFRS’s questionnaire (e.g. claiming that it is too confusing or difficult to complete) or about the wider consultation programme (e.g. claiming that the Options are too complicated for a layperson to understand, or raising issues with how the consultation events were scheduled and advertised, etc).

Open-ended comments about costs and funding

2.26 A number of respondents made comments along the following lines, in relation to costs and funding:

- » It is unreasonable that residents should endure a reduction in service when they are continuing to contribute to DSFRS via the council tax precept;
- » More funding and investment are needed for the FRS in general;
- » The FRS is already under-resourced and should not be subject to a further reduction.

Open-ended comments about staffing

2.27 The following comments in relation to staffing were made widely by respondents:

- » DSFRS’s current firefighters do an excellent job, and their local knowledge makes them especially valuable;
- » The service needs more firefighters, not fewer;
- » DSFRS would be better off reducing the number of senior managers and workers in back office functions and reducing wages etc, in order to make savings;
- » Better recruitment processes are needed, particularly to increase the number of retained staff;
- » More measures should be taken to improve staff retention e.g. improving pay and/or conditions.

Other themes raised by the open-ended comments

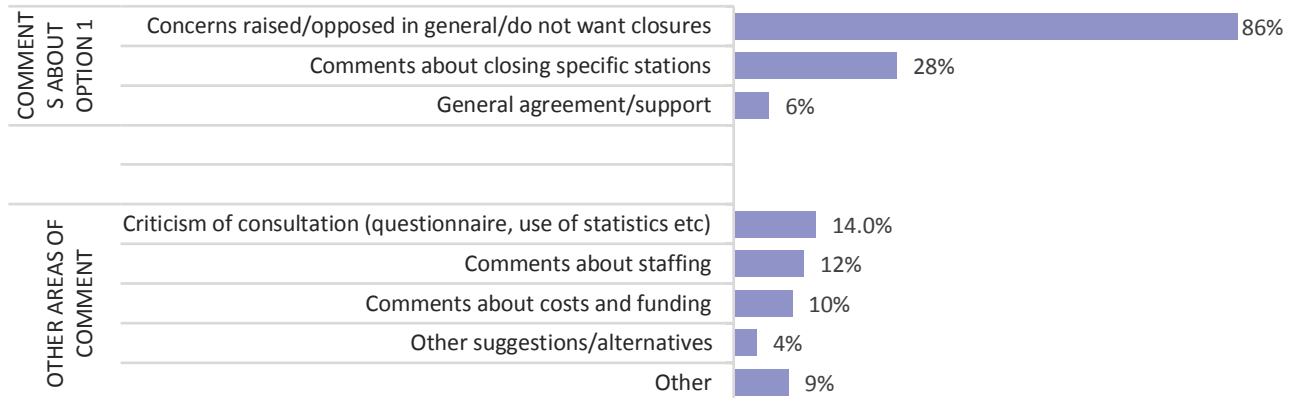
2.28 There were some comments about how the proposals would enhance the importance of education and prevention work (carrying out Home Fire Safety Checks, etc.). Others commented on the need for any changes to be subject a trial period or slow transition (i.e. in order to assess whether they were working), while a few queried why some other certain fire stations had not been included in the proposals, (especially as some were said to be underperforming).

Summary of open-ended comments about Options 1 to 6

Option 1: Station closures at Appledore, Ashburton, Budleigh Salterton, Colyton, Kingston, Porlock, Topsham and Woolacombe

High level summary of all comments made in relation to this question

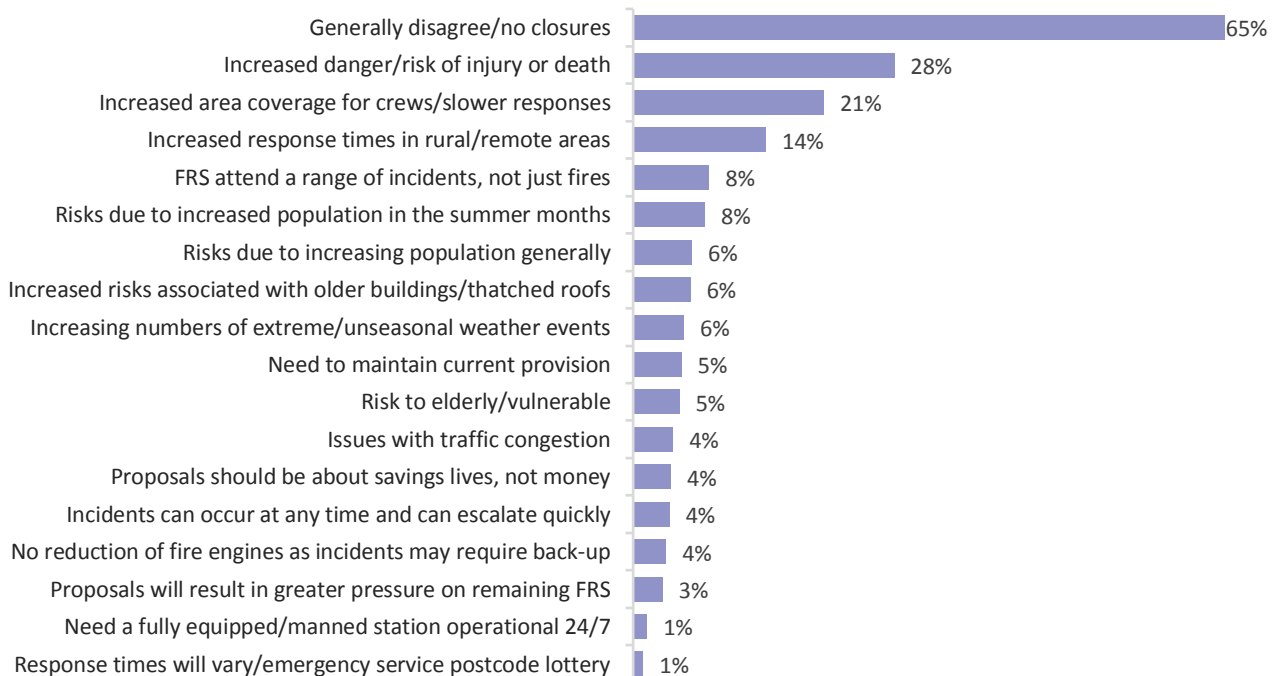
Figure 2: General summary of comments received in relation to Option 1



Base: All respondents who made comments in relation to Option 1 (2,487)

More detailed breakdown of those comments raising concerns/general opposition in relation to this question

Figure 3: Summary of main concerns raised in relation to the station closures proposed under Option 1 (NB only shows themes raised by 1% or more of respondents)



Base: All respondents who made comments in relation to Option 1 (2,487)

More detailed breakdown of just those comments that referenced specific station closures, or other relevant comments, in relation to this question

Table 3: Summary of comments that discussed the closure(s) of one or more specific stations, in response to the open-ended question seeking views about Option 1 (an * indicates a percentage of less than 0.5%).

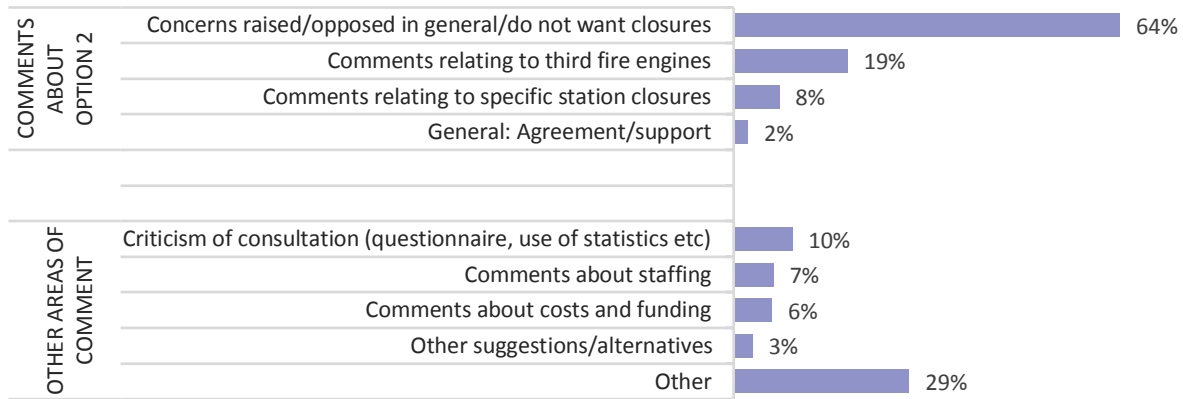
Summary of comments focusing on one or more <u>SPECIFIC</u> stations under Option 1, plus relevant other comments		Number of respondents	% of respondents (Base: 2,487)
AGREEING with closure of:	Appledore	16	1%
	Ashburton	3	*
	Budleigh	26	1%
	Colyton	12	*
	Kingston	14	1%
	Porlock	5	*
	Topsham	26	1%
	Woolacombe	8	*
DISAGREEING with closure of:	Appledore	21	1%
	Ashburton	67	3%
	Budleigh	31	1%
	Colyton	88	4%
	Kingston	56	2%
	Porlock	373	15%
	Topsham	75	3%
	Woolacombe	72	3%
OTHER	Close station(s) in close proximity to another, with the busier one(s) to remain	36	1%
	Redistribute services/move them around	34	1%
	Make savings in other ways	32	1%
	Queries about why other stations have not been included (e.g. if underperforming)	9	*

Base: All respondents who made comments in relation to Option 1 (2,847)

Option 2: Station closures listed in Option 1, plus removal of third fire engines at Bridgwater, Taunton, Torquay and Yeovil

High level summary of all comments made in relation to this question

Figure 4: General summary of comments received in relation to Option 2



Base: All respondents who made comments in relation to Option 2 (2,292)

More detailed summary of just those comments relating to third fire engines and their removal, in relation to this question

Table 4: Summary of comments that discussed the removal of third fire engines and/or concerns about reducing fire engines in general, in response to the open-ended question seeking views about Option 2 (an * indicates a percentage of less than 0.5%).

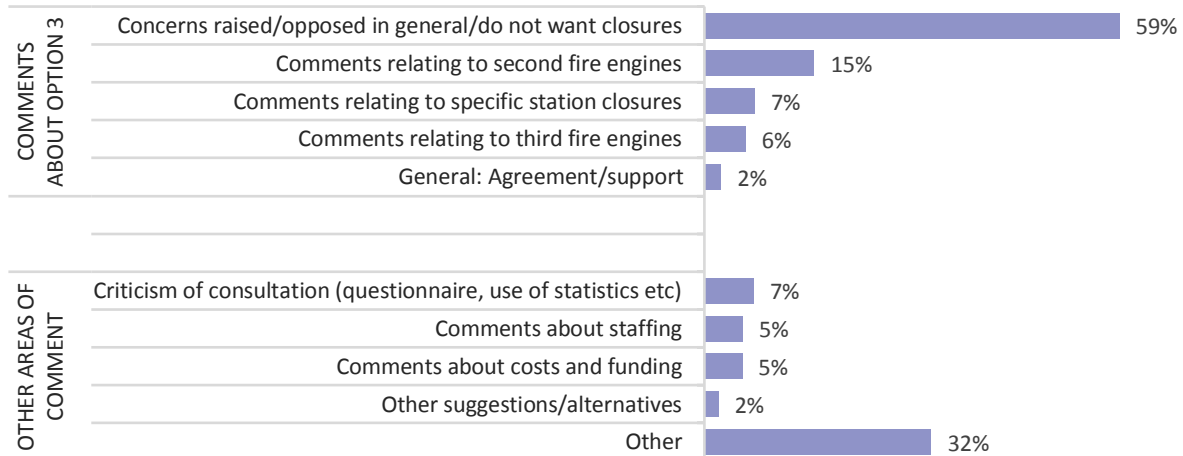
Summary of comments focusing on <u>third fire engines</u> under Option 2		Number of respondents	% of respondents (Base: 2,292)
GENERAL views on removing third fire engines	<u>General concerns</u> expressed about reducing fire engines (loss of 'back-up', concern about multiple incidents etc.)	196	9%
	<u>Agree</u> with removing 3 rd engines <u>where underused / understaffed</u>	135	6%
	<u>Agree</u> with removing 3 rd engines in general	105	5%
	<u>Disagree</u> with removing 3 rd engines in general	86	4%
	<u>Agree</u> with removing 3 rd engines <u>IF this helps stations to stay open</u>	60	3%
	Would support 3 rd fire engines being converted to roving engines	11	*
AGREEING with removal of third fire engine at a specific location:	Bridgwater	5	*
	Taunton	2	*
	Torquay	1	*
	Yeovil	3	*
DISAGREEING with removal of third fire engine at a specific location:	Bridgwater	30	1%
	Taunton	58	3%
	Torquay	19	1%
	Yeovil	19	1%

Base: All respondents who made comments in relation to Option 2 (2,292)

Option 3: Option 2, plus removal of second fire engines at Crediton, Lynton, Martock and Totnes

High level summary of all comments made in relation to this question

Figure 5: General summary of comments received in relation to Option 3



Base: All respondents who made comments in relation to Option 3 (2,143)

More detailed summary of just those comments relating to second fire engines and their removal, in relation to this question

Table 5: Summary of comments that discussed the removal of second fire engines and/or concerns about reducing fire engines in general, in response to the open-ended question seeking views about Option 3 (an * indicates a percentage of less than 0.5%).

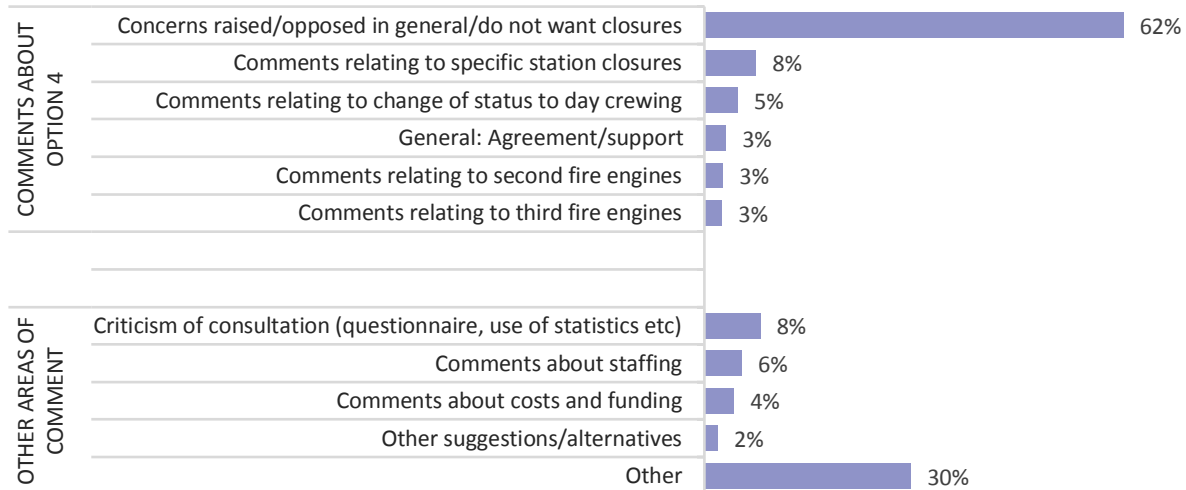
Summary of comments focusing on <u>second fire engines</u> under Option 3		Number of respondents	% of respondents (Base: 2,143)
GENERAL views on removing second fire engines	<u>Disagree</u> generally with the removal of second fire engines	162	8%
	<u>Agree</u> with removal <u>where underused/understaffed</u>	57	3%
	<u>Agree</u> with removing some engines <u>IF this helps stations to stay open</u>	28	1%
AGREEING with removal at a specific location:	Lynton	2	*
	Martock	1	*
	Totnes	3	*
DISAGREEING with removal at a specific location:	Crediton	10	*
	Lynton	54	3%
	Martock	15	1%
	Totnes	18	1%

Base: All respondents who made comments in relation to Option 3 (2,143)

Option 4: Option 3, plus change of status to day crewing at Barnstaple, Exmouth and Paignton

High level summary of all comments made in relation to this question

Figure 6: General summary of comments received in relation to Option 4



Base: All respondents who made comments in relation to Option 4 (2,084)

More detailed summary of just those comments relating to the change of status to day crewing, in relation to this question

Table 6: Summary of comments that discussed the change of status to day crewing, in response to the open-ended question seeking views about Option 4 (an * indicates a percentage of less than 0.5%).

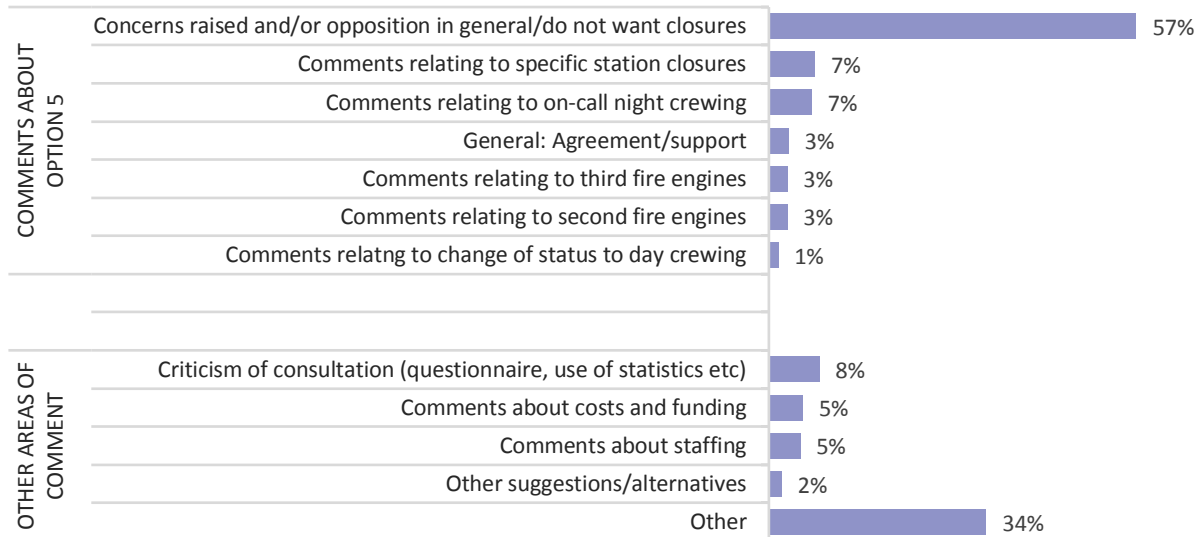
Summary of comments focusing on the change of status to day crewing under Option 4		Number of respondents	% of respondents (Base: 2,084)
GENERAL views on change of status to day crewing	<u>Disagree</u> with the change of status to day crewing	110	5%
	<u>Agree</u> with change of status to day crewing	53	3%
	<u>Agree</u> with change <u>IF this helps stations to stay open</u>	14	1%
AGREEING with change at a specific location:	Barnstaple	4	*
	Exmouth	6	*
	Paignton	6	*
DISAGREEING with change at a specific location:	Barnstaple	57	3%
	Exmouth	43	2%
	Paignton	36	2%

Base: All respondents who made comments in relation to Option 4 (2,084)

Option 5: Option 4, plus change of status of second fire engine to on-call at night only at Brixham, Chard, Dartmouth, Frome, Honiton, Ilfracombe, Okehampton, Sidmouth, Tavistock, Teignmouth, Tiverton, Wellington, Wells and Williton

High level summary of all comments made in relation to this question

Figure 7: General summary of comments received in relation to Option 5



Base: All respondents who made comments in relation to Option 5 (2,060)

More detailed summary of just those comments relating to on-call night crewing, in relation to this question

Table 7: Summary of comments that discussed on-call night crewing (an * indicates a percentage of less than 0.5%).

Summary of comments focusing <u>on-call night crewing</u> under Option 5		Number of respondents	% of respondents (Base: 2,060)
GENERAL views on on-call night crewing	<u>Disagree</u> with on-call night crewing	66	3%
	<u>Agree</u> with change of status of second fire engine to on-call at night only	56	3%
AGREEING with change at a specific location:	Brixham	1	*
	Chard	1	*
	Dartmouth	1	*
	Honiton	1	*
	Ilfracombe	1	*
	Sidmouth	1	*
	Tavistock	1	*
	Teignmouth	1	*
	Tiverton	1	*
	Wells	1	*
	Williton	1	*
DISAGREEING with change at a specific location:	Brixham	3	*
	Chard	4	*
	Dartmouth	1	*

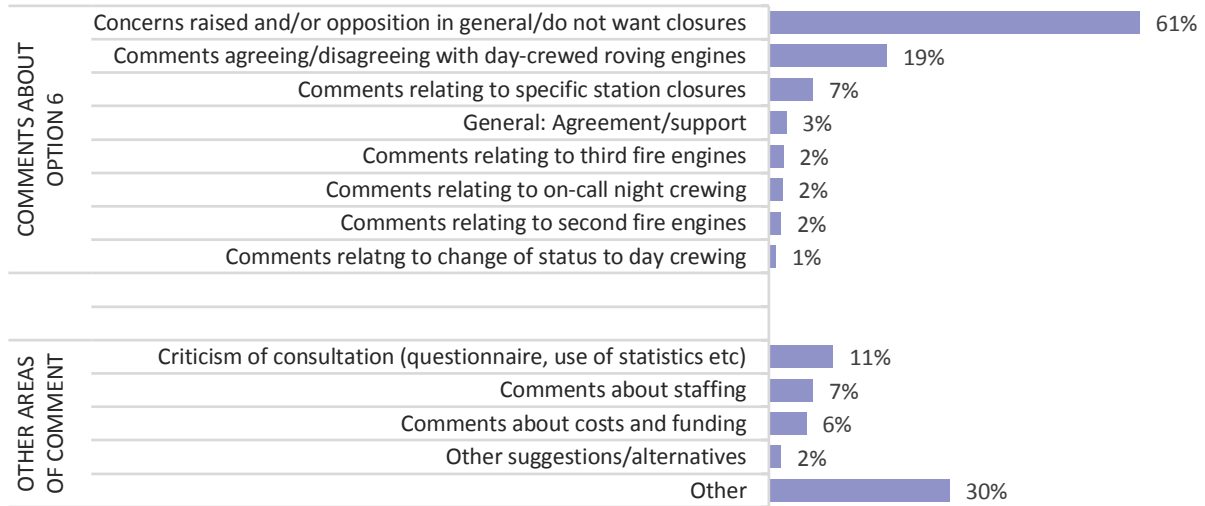
	Frome	28	15%
	Honiton	2	*
	Ilfracombe	10	*
	Okehampton	5	*
	Sidmouth	8	*
	Tavistock	8	*
	Teignmouth	1	*
	Tiverton	2	*
	Wellington	14	1%
	Wells	2	*
	Williton	3	*

Base: All respondents who made comments in relation to Option 5 (2,060)

Option 6: Option 5, plus the introduction of day crewed roving fire engines for targeted response and additional prevention work

High level summary of all comments made in relation to this question

Figure 8: General summary of comments received in relation to Option 6



Base: All respondents who made comments in relation to Option 6 (2,075)

More detailed summary of just those comments relating to day-crewed roving engines, in relation to this question

Table 8: Summary of comments that discussed day-crewed roving engines (an * indicates a percentage of less than 0.5%).

Summary of comments focusing on day-crewed roving engines under Option 6		Number of respondents	% of respondents (Base: 2,075)
GENERAL views on day-crewed roving engines	<u>Disagree</u> with introduction of day-crewed roving fire engines	281	14%
	<u>Concern: need details</u> on implementation e.g. cost/crew welfare/logistics	186	9%
	<u>Agree</u> with introduction of day-crewed roving fire engines	121	6%
	<u>Alternative</u> : convert third fire engines to roving vehicles	5	*
	Other: comments about value of prevention and education e.g. HFSCs	32	2%

Base: All respondents who made comments in relation to Option 6 (2,075)

Summary of open-ended comments about Option 7 ('mix and match')

- 2.29 The question inviting respondents to put forward their own 'mix and match' option prompted a very diverse range of comments, many of which were very specific or detailed. Some respondents put forward quite technical arguments for DSFRS's consideration.
- 2.30 For this reason, it is very difficult to put forward a concise summary of the comments that also does justice to the range and complexity of the views expressed. Readers are therefore encouraged to refer to the table below, which contains a much more detailed breakdown of the coded themes, as well as Appendix 3 which has the verbatim comments for many of the more detailed alternatives.

Table 9: Summary of comments received in relation to Option 7 (i.e. 'mix and match')

Comment		Number of responses	% of respondents (Base:2,268)	
Comments expressing general disagreement/concern, including comments opposed to any station closures (ALL REASONS)		1,720	76%	
Comments supporting particular options	Generally agree with proposals/think they are a good idea	25	1%	
	Agree that savings need to be made /proposal will save money	34	1%	
	Agree due to level of demand for current provision	9	*	
	Fire brigade are the experts/whatever you think is best	12	1%	
	Agree with Option 1	20	1%	
	Agree with Option 2	17	1%	
	Agree with Option 3	15	1%	
	Agree with Option 4	15	1%	
	Agree with Option 5	15	1%	
	Agree with Option 6	13	1%	
	Agree with principle of Option 7 (mix and match)	90	4%	
	Agree with removal of redundant equipment	15	1%	
	Agree with reduction of some fire engines (no more details)	21	1%	
Views on specific station closures	Agree with closing:	Appledore	13	1%
		Ashburton	4	*
		Budleigh	17	1%
		Colyton	8	*
		Kingston	8	*
		Porlock	0	*
		Topsham	18	1%
		Woolacombe	4	*
	Disagree with closing:	Appledore	11	*
		Ashburton	47	2%
		Budleigh	24	1%

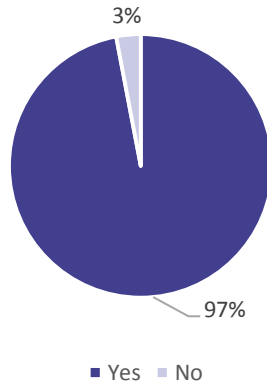
		Colyton	188	8%
		Kingston	123	5%
		Porlock	278	12%
		Topsham	48	2%
		Woolacombe	28	1%
Views on removal of third fire engines	Agree with the removal of third fire engines in general		72	3%
	Agree with removal where underused / understaffed		46	2%
	Agree with removal if helping to keep stations open		41	2%
	Disagree with the removal of third fire engines in general		25	1%
	Agree with removing from:	Bridgwater	3	*
		Taunton	2	*
		Torquay	2	*
		Yeovil	3	*
	Disagree with removing from:	Bridgwater	4	*
		Taunton	14	1%
		Torquay	7	*
		Yeovil	4	*
Views on removal of second fire engines	Agree with the removal of some second fire engines		33	1%
	Agree with removal where underused / understaffed		31	1%
	Agree with removal if helping to keep stations open		26	1%
	Disagree with the removal of second fire engines in general		30	1%
	Agree with removing from:	Crediton	1	*
		Lynton	5	*
		Martock	1	*
	Disagree with removing from:	Crediton	4	*
		Lynton	16	1%
		Martock	3	*
		Totnes	5	*
	Views on change of status to day crewing	Agree with changes of status of day crewing in general		26
Agree with change if helping to keep stations open		19	1%	
Disagree with changes of status to day crewing in general		24	1%	
Agree with change at:		Barnstaple	3	*
		Exmouth	7	*
		Paignton	2	*
Disagree with change at:		Barnstaple	23	1%
		Exmouth	31	1%
		Paignton	16	1%
Views about on-call night crewing	Agree with change of second fire engine to on-call at night		34	1%
	Disagree with on-call night crewing		14	1%
		Ilfracombe	1	*

	Agree with change at	Sidmouth	2	*
	Disagree with change at:	Brixham	4	*
		Chard	5	*
		Dartmouth	4	*
		Frome	10	*
		Honiton	8	*
		Ilfracombe	9	*
		Okehampton	3	*
		Sidmouth	11	*
		Tavistock	5	*
		Teignmouth	1	*
		Tiverton	3	*
		Wellington	6	*
		Wells	1	*
		Williton	4	*
Views on day-crewed roving engines	Agree with introduction		70	3%
	Disagree with their introduction		61	3%
	Convert third fire engines to roving vehicles		9	*
Other suggestions or alternatives	Savings need to be made in alternative ways		55	2%
	Redistribution of services		44	2%
	Close stations in close proximity to another, with the larger/busier station to remain		18	1%
	Other alternatives		124	5%
Other comments	Comments criticising the consultation		424	19%
	Comments about staffing		346	15%
	Comments about costs and funding		209	9%
	Other		374	16%

Base: All respondents who made comments in relation to Option 7 (i.e. 'mix and match') (2,268)

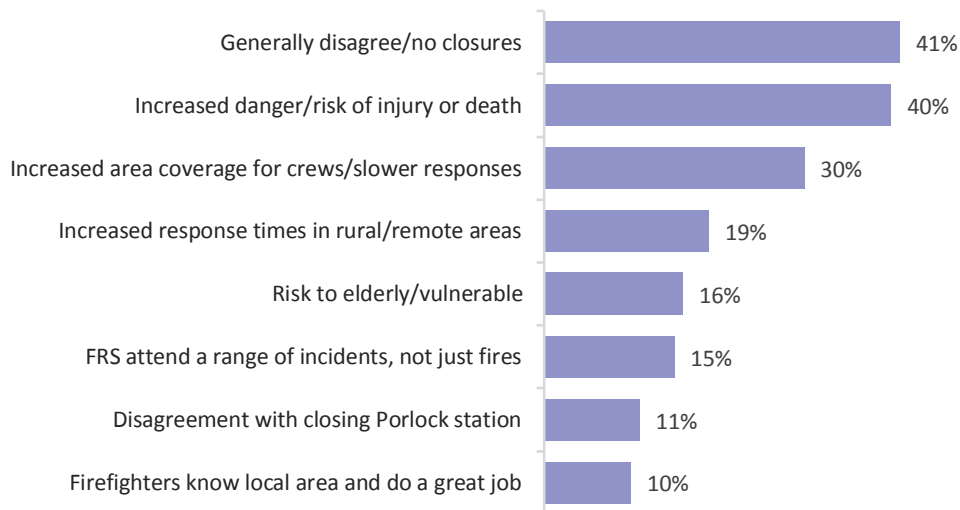
Summary of other questions: impacts

Figure 9: Whether respondents feel the options will have an impact on them, on someone they know or on their community



Base: All respondents who made further comments (2,898)

Figure 10: Summary of main concerns raised by those who foresaw an impact on themselves, somebody they knew or on their community as a result of the proposals (NB only shows themes raised by at least 10% of respondents)

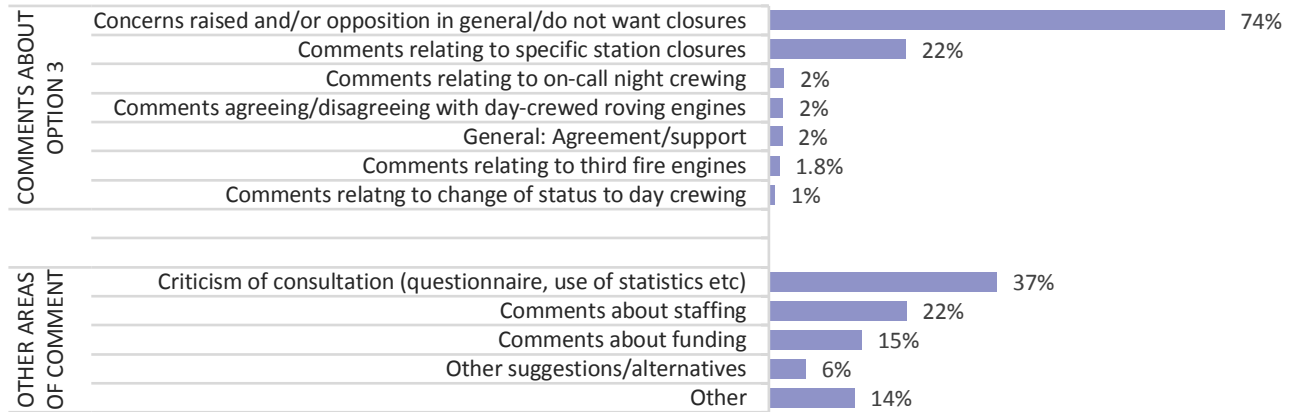


Base: All respondents who felt they would be impacted by the options and provided further comments as to why (2,603)

Summary of other questions: further comments

High level summary of all comments made in relation to this question

Figure 11: General summary of comments received when respondents were asked if they had any other comments to make



Base: All respondents who made further comments (2,117)

More detailed summary of just the 'other' areas of comment raised in relation to this question

Table 10: Summary of main other areas of comment when respondents were asked if they had any other comments to make

Summary of comments focusing <u>the main other areas of comment</u> (i.e. the consultation, costs/funding and staffing issues)		Number of respondents	% of respondents (Base: 2117)
Comments CRITICISING THE CONSULTATION	Statistics stated are not accurate/very misleading	248	12%
	Need more information/not enough information available	94	4%
	Just a cost cutting/money making exercise; not about safety	85	4%
	Minds already made up/leading questions/'tick box' exercise	63	3%
	General or other criticism of the questionnaire/consultation	614	29%
Comments about COSTS AND FUNDING	FRS needs increased funding/more investment needed	154	7%
	Already pay high council tax/same service should still be provided	100	5%
	Money involved would be better spent elsewhere	38	2%
	FRS already under-resourced; doesn't need a further reduction	31	1%
	Happy to pay increased council tax to maintain service levels	30	1%
	Savings will be too minimal; more needs to be saved	13	1%
Comments about STAFFING	Local firefighters do a great job generally and know the area	197	9%
	Reduce senior management/wages/bureaucracy/office staff	159	8%
	Need measures to help retain staff e.g. better pay/conditions	85	4%
	Need more firefighters, not fewer	64	3%
	Need better recruitment process e.g. for retained staff.	61	3%
	Increase use of retained staff (e.g. as opposed to wholetime) to save money	15	1%

Base: All respondents who made further comments (2,117)

3. Written Submissions

Overview of written submissions

- 3.1 During the formal consultation process 205 written submissions were received from residents, staff, organisations and other stakeholders in the form of letters – and a further 381 via email.
- 3.2 The table below shows the breakdown of contributors by type (letters only).

TYPE OF CORRESPONDENT	NUMBER OF RESPONSES	NAME OF ORGANISATION
Individuals	106	
Town and Parish Councils	47	<p>Ashburton Town Council</p> <p>Axminster Town Council</p> <p>Barnstaple Town Council</p> <p>Beer Parish Council</p> <p>Bickington Parish Council</p> <p>Bow Parish Council</p> <p>Braunton Parish Council</p> <p>Bridgwater Town Council</p> <p>Brixham Town Council</p> <p>Buckfastleigh Town Council</p> <p>Buckland in the Moor Parish Council</p> <p>Buckland in the Moor Parish Council</p> <p>Budleigh Salterton Town Council</p> <p>Chard Town Council</p> <p>Clyst St George Parish Council</p> <p>Colyton Parish Council</p> <p>Combe Martin Parish Council</p> <p>Comeytrove Parish Council</p> <p>Creech St Michael Parish Council</p> <p>Cullompton Parish Council</p> <p>Cutcombe Parish Council</p> <p>East Worlington Parish Council</p> <p>Exmouth Town Council</p> <p>Hatherleigh Town Council</p> <p>Holne Parish Council</p> <p>Holne Parish Council</p>

		<p>Horwood, Lovacott and Newton Tracey Parish Council</p> <p>Ivybridge Town Council</p> <p>Lynton & Lynmouth Town Council</p> <p>Mortehoe Parish Council</p> <p>Musbury Parish Council</p> <p>Newton Abbot Town Council</p> <p>Pitcombe Parish Council</p> <p>Porlock Parish Council</p> <p>Porlock Parish Council</p> <p>Selworthy and Minehead Without Parish Council</p> <p>Shute Parish Council</p> <p>Stogumber Parish Council</p> <p>Teignmouth Town Council</p> <p>Trudoxhill Parish Council</p> <p>Wellington Town Council</p> <p>West and East Purford Parish Council</p> <p>West Down Parish Council</p> <p>Widcombe-in-the-Moor Parish Council</p> <p>Winford Parish Council</p> <p>Woodbury Parish Council</p> <p>Yeovil Town Council</p>
County and District/Borough Councils and Councillors	10	<p>East Devon District Council</p> <p>Exeter Strategic Board</p> <p>Sedgemoor District Council</p> <p>Somerset and West Taunton Council</p> <p>Somerset County Council</p> <p>Torbay Council</p> <p>Councillor Jacqi Hodgson</p> <p>Councillor Lee Howgate</p> <p>County Councillor for Wellington</p> <p>Mendip District Portfolio Holder for Community Health Services</p>
MPs	8	<p>Geoffrey Cox QC MP</p> <p>Kevin Foster MP</p> <p>Peter Heaton-Jones MP x 2</p> <p>Ian Liddell-Grainger MP</p> <p>Neil Parish MP</p> <p>Mel Stride MP</p>

		Sarah Wollaston MP
National Parks and Associated Organisations	5	Dartmoor National Park Dartmoor Commoners Council Exmoor National Park Spitchwick Commoners HLS Association The Exmoor Society
Housing Organisations	4	Abbeyfield Porlock Society Clinton Devon Estates Devon Landlords' Association The Bridge Group
Businesses and Business Representatives	4	Budleigh Salterton Chamber of Commerce and Trade Leonardo Helicopters Pritchard Patent Product Co. Unknown local business
Environmental and Heritage Organisations	3	Colyton Chamber of Feoffees National Trust Lee Abbey
Trade Unions	3	Fire and Rescue Services Association (FRSA) x 2 Fire Brigades Union (FBU)
Staff Groups	2	Colyton Fire Station Topsham Firefighters
Partner Organisations	2	North Devon Healthcare NHS Trust Office of the Police and Crime Commissioner
Educational/Leisure Establishments	2	Yeovil College Newton Abbot Recreational Trust
Political Parties	1	North Devon Labour Party
Unknown	8	
TOTAL		205

- 3.3 Although it is difficult to quantify exactly because many of the submissions received discuss several different aspects of the consultation proposals, where possible we have categorised them by area. In doing so, it is clear that the highest level of response was received from:
- Ashburton;
 - North Devon (and specifically Woolacombe and Barnstaple);
 - Porlock; and
 - Colyton.
- 3.4 ORS has read all the written submissions and reported them in this chapter. Most have been reviewed in a thematic, summary format in order to identify the range of views and issues as well as common themes, though some that have presented unique or distinctive arguments, or that refer to different evidence, have been summarised individually for accessibility and to highlight their main arguments and any alternative proposals.

It is important to note that the following section is a report of the views expressed by submission contributors. In some cases, these views may not be supported by the available evidence - and while ORS has not sought to highlight or correct those that make incorrect statements or assumptions, this should be borne in mind when considering the submissions.

Summary of themes from written submissions

- 3.5 Summary tables of the main themes emerging from the shorter or less complex written submissions received by DSFRS and ORS are presented in Appendix 1 - and the main themes arising from the email submissions have been summarised in the tables in Appendix 2¹.
- 3.6 This chapter presents a narrative summary of these tables. If making similar points, the submissions made by individuals, stakeholders and organisations have been reported together - whereas any that are significantly different or more detailed are included in a fuller format later in this chapter.
- 3.7 Please note that where we have not attributed the comment in brackets following a direct comment, this is in order to ensure anonymity as the comment was made by an individual.

¹ “In the appendices we have taken care to ensure that no information that identifies individual respondents has been included in this report. However, where a response has been submitted on behalf of an organisation (such as a Parish Council), we have included the name of that organisation as this is often important for context, but does not compromise individual anonymity”

Main themes raised in written submissions

- 3.8 The main views raised in relation to DSFRS and its proposals more generally are outlined in the tables in Appendix 1.

General views

- 3.9 Only a few submissions expressed support for the proposals in any way, with the highest number in support of increased protection, prevention and education activity.

“It is admirable that prevention and education are taking place and take up a sizeable percentage of the budget”.

- 3.10 Respondents gave various general reasons for opposing the proposals, the most frequent being concerns over increased risk to the public and firefighters - and concerns for safety in rural communities more generally. Vulnerable people were considered to be particularly at risk from the proposed changes. Some typical comments were:

“Reducing capacity will result in some areas remaining uncovered by a fire service for significant periods while crews will have to travel further to deal with emergencies”

“I believe that the options set out by Devon & Somerset Fire & Rescue Services would leave the area in a weak position and in the event of fire put lives at serious risk”

“The proposed cuts to front line services will result in an unacceptable increase in risk to both members of the public and the Firefighters alike”

“The risk to firefighters will significantly increase if these cut proposals are approved ... Is firefighters’ safety still a concern for DSFRS? if so how?”

“One conclusion may be that your concern for the wellbeing of people living in rural areas is not a priority and may, therefore, be simply downgraded with these people being categorised as more expendable and less worthy of saving by your planners?”

“We live in a very rural area which for the most part is very difficult to get to in the winter months due to the locality and also very busy with tourists in the summer season...if any of these cuts go ahead it will make communities such as these very vulnerable and isolated”

“The disabled and frail (whom I believe are recommended to stay in their dwellings - windows and doors shut - until help arrives) may be at a disadvantage if too many engines are cut”.

- 3.11 The fact that incidents other than ‘station ground’ fires and RTCs were not taken into account in DSFRS’ modelling was a frequent criticism - as was whether present standards of response with respect to other incidents would be met, especially since slower response times are considered an inevitable consequence of the proposals.

“The station is a base for the Porlock Co-Responder service. There is a great concern at the loss of this important community service provided by the fire fighters”

“Then there are Road Traffic Collisions (RTCs) involving high speed impacts resulting in occupants having to be released using hydraulic road rescue equipment”

“The main London to Penzance railway line runs through the area and while this poses a risk, the significant rail risk is associated with Whiteball Tunnel. At 1,000m long this has the potential for a protracted and complex deployment”

“Mendip, like many other Devon and Somerset areas contains communities susceptible to flooding and I would like to know how the proposals impact on responses to flooding and other specialist capabilities including dealing with hazardous chemicals and how the service will support local authorities and event organisers to protect the safety of the public”.

3.12 Increased response times more generally were a major concern. Some made general statements:

“Response time in tackling fires is the most important factor. By closing stations & reducing staffing you will be increasing response time & putting our lives in danger”

“What is utterly unacceptable is wholesale removal from large geographical areas of your ability to respond to incidents within a reasonable time”

Whereas others cited specific experience where time was of the essence in saving lives or property and where they feel the outcome in similar circumstances would be less satisfactory following the proposed service changes:

“We have had three fires in the last two years where had it not been for the quick response of the fire crews of Topsham could have become large fires”

“By the time other responders arrived, the house would probably have burned down!”

“...the Woolacombe Responders were first at the scene and managed to rescue the driver and his passenger, a very young girl, and save them from any further serious injuries. Other responders, including a helicopter, arrived too late!”

3.13 Housing developments and increasingly busy roads leading to congestion and more incidents was also a cause for concern in relation to the proposals. Many felt that provision should be increased rather than decreased in times of population expansion - and that the current proposals will have to be overturned in future once the increased risks and consequences of a reduced service are realised.

“Once you cut the services it will be extremely difficult to restore them at a future date ... the eventual need to bring back fire services to the area as a result of both housing and industrial development will far outstrip any savings made now”.

3.14 Climate change and its impacts in terms of increasing numbers of moorland fires and flooding was mentioned frequently and, again, given as a reason for at the very least maintaining existing provision.

“You don’t appear to have accounted for the likely rise in incidents as a result of climate change: flood, fire and possibly even dams bursting”

3.15 The email submissions in particular made negative statements about DSFRS, such as:

“Senior Management...seem to have taken the Core Values of the Service and systematically obliterated them... I'm disgusted and ashamed at the levels of dishonesty, misinformation and downright arrogance they have shown towards the public they are supposed to serve”.

3.16 Others talked about an ensuing lack of faith in DSFRS: (“my faith in the leadership and management of it is being seriously tested at the present time”) and questioned the competence of those responsible for the consultation:

“These proposals demonstrate a lack of foresight, innovation and to be brutally frank, incompetence”

“The idiots who put these options forward are clearly incompetent and lack any understanding of what constitute sensible public safety provisions... On Health and Safety grounds alone the degree of incompetence demonstrated would justify sacking”.

3.17 Many of the concerns presented in this section are also repeated later in this chapter under other themes.

The options

3.18 Consultees were invited to comment on seven proposed options for change. Few expressed positive comments (see Appendices 1 and 2).

3.19 There were also relatively few critical comments about the specific options. This may be because consultees found it hard to target their concerns at options that encompass a range of elements and stations – and people and organisations tended to oppose the proposals in more general terms instead of citing specific options. More comments were made about the specific stations affected and these are presented later in this chapter.

Station closures

3.20 Only one submission supported a station closure; this was in relation to Budleigh Salterton. Furthermore, only two letters opposing the closure of Budleigh Salterton were submitted. Relatively few letters or emails in opposition were received also for Appledore, Kingston and Topsham.

3.21 By far the most frequently received letters of opposition concerned the proposed closures at Ashburton, Porlock, Woolacombe and, to a lesser extent, Colyton. There were consistently cited reasons given for opposing the closure of these stations, all of which were considered to increase risk and/or demand:

Increasing populations and new housing developments creating more demand, not less;

Longer response times via already congested, narrow roads;

The loss of firefighters with local knowledge of difficult local roads, community facilities and people;

The loss of local first responders/co-responders and the impacts on other areas and stations;

Demographic considerations – the high number of vulnerable older people in these rural communities and the impacts of tourism, particularly during the summer

A built environment comprising many older and heritage buildings, sometimes thatched and timber framed – as well as farm buildings and their contents; and

Increasing concern over the safety of landscape, people and wildlife across Exmoor and Dartmoor with the closure of nearby stations and growing impacts of climate change (in terms of fires and flooding).

3.22 There were further, more, specific issues raised in relation to the following stations:

Appledore: should the shipyard, docks and fishing industry revive, a local FRS will be needed

“... the Bidna yard remains fully equipped and Richmond Dock needs only a small investment to accommodate ships. Furthermore, the potential to revive our fishing industry could well happen. Please do not base your decisions on today’s situation; retain the fire station and, if as I hope, it will become needed in the future”

Ashburton: losing appliances from Totnes and Torquay will reduce the capability of these stations to cover the loss of Ashburton. There is a higher than reported and increasing number of RTCs on the A38 requiring specialist equipment which is currently held at Ashburton

“All options include the closure of Ashburton FS implying that cover can be provided by neighbouring stations, yet fail to acknowledge that Totnes station is set to lose a second fire engine...also in options 2 to 6, Torquay loses its third fire engine”

“Ashburton cover a great number of RTAs on the A38, of which many are not included in their statistics, as Buckfastleigh don’t carry the equipment needed to cut people out of the cars”

Colyton: this station has never had problems recruiting staff and has an exemplary record for gender equality - and houses some specialist capabilities

“Colyton has never had problems recruiting volunteers, and at present we have three female officers - 25% of the 12 strong crew - with another undergoing training”

Kingston: this station has the only four-wheel drive vehicle in the area capable of negotiating roads that are inaccessible to larger appliances at times of emergency. The cost of running the station is relatively small - and far less than reported in the consultation document - owing to the £2 peppercorn rent and volunteer crew

“The only 4-wheel drive fire engine capable of getting to Burgh Island and other difficult terrains”

“There would be some capital saving, but to expose so many localities to greater risk so that you can save the £2 per annum peppercorn rent charged by the Flete estate for the use of the station building seems remarkably short-sighted”

Porlock: the difficult road conditions (including Porlock Hill), summer congestion and winter snow will leave the local area vulnerable should this station close - and the station has recently won awards

“Porlock is a popular tourist destination with an increased population in the summer using the camping and caravan sites in the village and surrounding areas”

“Porlock Hill, the steepest A road in England, has accidents of varying severity every year”

“The station was awarded as the best station in D&S FA last year and provides nearly 90% availability. To close the station is totally counter intuitive”

Woolacombe: this station has no crewing difficulties, unlike Braunton and Ilfracombe which would be the nearest responding stations to any events in the Woolacombe area.

“Ilfracombe and Braunton are both retained stations and struggle to actually keep a fire engine available”

“(Woolacombe) has just recruited three new recruits...and there are more waiting to join...The future looked positive for the crewing of Woolacombe station. In fact, we would most likely be one of the most reliable and stable retained stations”.

Third fire engine removal

- ^{3.23} Relatively few letters of opposition were received regarding the removal of third fire engines at Torquay, Bridgwater and Taunton but rather more for Yeovil. The reasons given are presented in the tables in Appendices 1 and 2 but briefly include concerns over: Exmoor; population growth; the regularity with which third fire engines are deployed to support or cover; the vulnerability of the high number of college students (Yeovil) and not meeting the (PDAO) requirement for military or commercial or industrial incidents.

“Yeovil is expanding rapidly, both residentially and commercially”

“With regards the suggestion of removing the 3rd fire appliance at stations I also disagree with this, these appliances are used and are a very valuable resource, these appliances provide excellent resilience when needed and their removal would affect operation response”

“The loss of a reactive and timely fire service could put our five thousand college students at risk in the event of an emergency”

“Crewing both or even one appliance could result in the service not being able to respond in a timely manner to the Network Fire Services Partnership’s minimum Pre-Determined Attendance (PDAO) requirement of 4 x fire appliances for a Military Aircraft Crash here at Leonardo or 2 x appliances for a commercial/industrial accident”.

Second fire engine removal

- ^{3.24} Submissions did not on the whole refer specifically to the proposed removal of second fire engines from a number of stations, though there was a noticeably vocal lobby against the removal of the second engine at Lynton.

- 3.25 The main reasons given for opposition to the proposal to remove second fire engines from some stations were:

The loss of specialist appliances suited to local circumstances and terrain (Crediton and Lynton);

The loss of an engine suited to respond to incidents on Exmoor – a significant tourist destination and area of national environmental significance that is under threat from the consequences of climate change (Lynton);

The remoteness of the community and long distances from nearest responding stations (Lynton);

The risks associated with the seasonal influx of high numbers of tourists (Lynton);

The combined likely impacts of a number of elements of the proposal in a local area (Martock); and

The high number of timber framed buildings (Totnes).

Change of status to day crewing

- 3.26 Consultees were opposed to the proposed change to day crewing at Barnstaple, Exmouth and Paignton owing to the demands on the Service from large and increasing populations and institutions including hospitals, care homes, industrial and commercial buildings and schools.

“As Barnstaple is the main centre for the larger North Devon area (and will) see a growth in the area of 17,220 new homes...It is important that North Devon has a Fire Station this is manned 24 hours a day by full time firemen with specialised equipment that can supplement the other fire stations in North Devon. The risk is far too great to the people of North Devon if Barnstaple Fire Station is downgraded”

“With the closure of Budleigh, Exmouth should be 24/7, not part-time staffing. Two pumps and one small 4x4 would be insufficient to cover a very wide area including the high-risk Woodbury Common and the Royal Marine Camp and Sandy Bay Caravan complex”.

- 3.27 It was also said that the stations’ specialist equipment and search and rescue trained officers are needed to reach high buildings and emergency situations such as flooding. The proposal would, it was felt, put extra pressure on retained firefighters and impact on the retention of these personnel.

“Firefighters there are specially trained to deal with both search and rescue in difficult access scenarios including flooding and swift water incidents in addition to line rescues from height and confined spaces...provides this cover 24 hours a day, seven days a week right across North Devon and beyond”

“It will put more pressure on the retained personnel...at the moment they will only be disturbed at night if Barnstaple have a two-pump shout...if these night-time shouts increase by a large percentage, it is going to impact them...I think many will leave due to it being too much of an intrusion into their work and personal lives”

- 3.28 Other, more general, concerns were around reductions in cover, especially at night when the probability of fire spreading is statistically greater; and the impact on staffing due to a dependence on retained staff overnight.

Change of status of second fire engines to on-call at night only

- 3.29 There were no written submissions in relation to this element of the proposals for Brixham, Dartmouth, Sidmouth and Tiverton.
- 3.30 Reasons for objecting in the other areas have already been noted with regard to other elements of DSFRS' proposals, for example:

The increasing number of dwellings in the area (Chard, Tavistock, Wellington, Wells);

The loss of specialist equipment to reach high buildings in Ilfracombe;

Proximity of the M5 (to Wellington) and the number of RTCs the service attends as a co-responder; and

The number of heritage buildings of national significance (Wells).

Respondents also highlighted deprived communities in Frome and Teignmouth and their associated high-risk behaviours and the Glastonbury Festival.

- 3.31 More generally, fewer engines during the day will, it was felt, increase response times and risk to local populations, institutions and businesses. It was also suggested that such a status change would be divisive for crews and would have a negative impact on recruitment and staff turnover – and could impact on goodwill among local employers, and their preparedness to release employees for on-call duties.

“What's the knock-on effect for surrounding stations' employers? Shepton's call rate is likely to increase but how much of a negative effect will this have with the relations and goodwill of employers who are releasing, and could this change due to the increased demand?”

Introduction of six day crewed roving fire engines

- 3.32 Only two submissions made positive comments about this proposal:

“...they can be targeted”

“Mobile pumps might be an increasing option for smaller incidents in housing and road traffic”.

- 3.33 Many of the concerns voiced related to the fact that this element of the proposals is *“vague and undefined”*, and that potential sites/hosts for such vehicles had not been specified. Indeed, the largest number of comments in relation to this aspect took the form of questions, or requests for more information.
- 3.34 Other comments related to concerns about insufficient cover, and the proposal being used to justify closures or cuts in other areas.

“The idea of a guy in a Land Rover serving as a mobile unit up on the Moor is rather laughable...would there be a phone signal where they decided to park up for the day? If he attended a fire, what’s he going to do? ...Where would his fire hose and water supply be?”

- 3.35 Others mentioned resource implications and how the cost of introducing roving engines would be met, given the need to reduce costs currently.

Other issues: finance and funding

- 3.36 Many submissions made comments around the projected cost savings and funding arguments in the consultation documents; some related specifically to particular stations and some were of more general relevance.

- 3.37 The most frequent criticism of the proposals was that consultees could see no evidence of DSFRS’ intention to improve the service and that the actual aim is to cut costs in spite of the increased risk this presents. The seemingly high financial reserves held by DSFRS were mentioned by some as evidence against implementing radical service reductions.

“Make no bones about it; this is a cost-cutting exercise ... yet the Fire Authority has in excess of £37 million held as reserves!”

- 3.38 The next most frequently mentioned point was that local taxes more than cover the costs of the stations under threat, and some stated that these taxes would still be demanded in the event of a reduced service. A small number of submissions suggested that communities might be happy to pay slightly more to maintain current service levels.

“We feel this is not fair or acceptable to the public who we rightly feel should have access to a fast, efficient service by paying a proportion of our Council Tax towards this”

“The station costs around £120,000 per year to run. The people of Colyton pay the Fire Authority about £136,500”

“I have no doubt that the general public respect and admire the Fire Service and the vital work done on our behalf. Also most people would be happy to pay the small additional amount required to enable you to keep up the good work and avoid service cuts”

- 3.39 Several people argued that the proposals would not necessarily yield the financial savings identified, or that they present a false economy considering the significant increased risk. Some argued for an increase in investment in DSFRS and others for challenging and lobbying Government against cuts in FRS budgets.

“The irony is that it is we who shall continue to pay for this sort of false economy...in reality there is no actual saving at all”

“The ‘Capital Savings’ column shows savings associated with the removal of the third and second fire engines for Options 2-5. However, the summary for Option 6 indicates similar savings of £5.725m which does not factor in the re-introduction of the roving appliances into the total numbers which we calculate would reduce the savings by £1.8m giving capital savings of £3.925m”

“I urge you not to reduce the service, but to lobby for more funding on the grounds of special circumstances of our area, such as increased population and the complex nature of our road system”.

- 3.40 There were some allegations of poor financial management, and criticism of recent large increases in the managerial pay budget and spending on “lavish” headquarters.
- 3.41 Partnership working and reducing management and administration roles were suggested as ways of making more risk averse savings, along with raising more for DSFRS through council tax.

Other issues: staffing and crewing

- 3.42 The focus on more protection, prevention and education in the consultation document came in for some criticism, as did the proposal for prevention officers to deliver this work. Several suggested that firefighters should provide these services instead.

“While it is acknowledged that prevention and education is vital to reducing the risk of fire incidents, this should not be at the expense of the response service”

“Fire fighters used to talk to people about fire safety. Why can’t they do that now to save employing someone else?”

- 3.43 Some argued that most incidents attended to by firefighters are RTCs and flooding events and that these will not be affected to any great degree by an increased focus on prevention. Some criticised the implication that an increased focus on fire prevention justifies reductions to response services and would like to see evidence for this.

“The agreement for disbanding stations is that there are very few fires, so an increase in prevention officers will have little effect. The statistics show that most incidents are road traffic accidents and flood and water rescues and backing up the primary appliance with more personnel... These incidents are not going to be reduced by increasing fire prevention officers...”

“Do they have hard facts that prove safety checks and visits will compensate for the proposed cuts and changes...?”

- 3.44 Concerns over recruiting on-call firefighters were raised by respondents and some suggestions for improving their pay and conditions were made. It was also argued that the implementation of these proposals would exacerbate recruitment issues by placing undue pressure on the role of on-call officers. Furthermore, the loss of local knowledge as a consequence of removing firefighting staff from local communities was a frequently mentioned worry.

“There needs to be greater clarity and detail about how the new pay structures would operate because significant concerns have been raised about the unintended consequences of reducing recruitment and retention rather than supporting them”

“They need a safe level of resourcing and staffing and realistic response targets to enable them to do their work properly, without putting themselves under excessive strain and risk”.

“The local crews know the best way to get to where they need to be, getting there quicker and saving lives”

- 3.45 The need to review the number of expensive management salaries in light of the proposals to cut frontline response was also raised.

Criticism of the consultation

- 3.46 Given that the submissions almost unanimously objected to the proposals, it is perhaps unsurprising that a relatively large number also criticised the consultation itself. The main issues identified concerned:

Allegedly inadequate, inaccurate or inconsistent statistics and a lack of detail

“The options proposed do not provide sufficient detail for the improvements claimed, particularly information on how the on-call system would be improved, how extra prevention and protection would be achieved or how much would actually be re-invested into the service”

“‘Cherry picking figures’ occurs when stating that some stations only respond to 10 or less fires per year as this is based on primary fires and does not account for supporting other engines, back ups, RTCs, fires outside the area, animal rescues or floods”

The ‘complicated’ consultation document and questionnaire

“I found the document a truly terrible document. The number of options and choices is bewildering and very difficult to fill in for most ordinary residents of the two counties. It is almost as if the forms were designed to baffle and confuse. There is great capacity for confusion and I feel that the whole process has been unfair on such an important issue for all residents across the two counties. I hear the response numbers are low and I am not surprised”

“The consultation process has been so confusing and off putting for the majority of the general public that many have not completed the questionnaire due to it being full of jargon and terminology that they simply do not understand, to ask them to comment or make decisions on something with such flawed data that they don’t even understand is ridiculous...unless of course this is what DSFRS want?”

The options themselves

“The reality of the consultation is that it is prescriptive and leads the respondent through a sequence of unacceptable alternatives. The whole consultation is premised on the first option. If that is unacceptable the following questions are pointless”.

“The way the FRS has requested feedback is constrained and doesn’t provide the public the opportunity to question some of the fundamental presumptions made’. Every option suggests the closure of eight stations and there’s little opportunity to provide feedback on the impact of closing each station in turn”

- 3.47 DSFRS’ consultation events were also criticised for reasons including poor venue choices, poor timing and limited community involvement.

- 3.48 Tables in Appendices 1 and 2 presents a comprehensive summary of all the issues of concern raised by respondents around the consultation.

Suggestions and alternatives

- 3.49 A few submissions included suggestions for the DSFRS, the most numerous being a recommendation to prolong the consultation period or delay making decisions until the implications are fully understood. Suggestions for improving the recruitment and retention of on-call firefighters were also made.
- 3.50 Tables in Appendices 1 and 2 present a list of all suggested alternatives.

Summaries of detailed submissions

- 3.51 As previously mentioned, some submissions have been summarised in detail to highlight their main arguments and any alternative proposals. Those reported here have typically been chosen either because they are particularly well-evidenced or raise several ‘different’ to those being repeated by a number of respondents - or because they include carefully-considered alternative options for DSFRS to consider.

Fire and Rescue Services Association (FRSA)

The National Executive of the FRSA supports the need for change in DSFRS but unreservedly opposes the proposals contained in ‘Safer Together’ because:

The proposals contain no ‘Vision’ to take DSFRS through the next 10 years. The FRSA is calling for an evolution over the next 5 years that will *“provide exciting opportunities to redeploy staff where necessary in an appropriate and person-centred approach”*; and

The proposals do nothing to demonstrate a willingness to invest and develop On-Call, which is accepted by the Home Office as the most efficient, effective way to provide emergency response in rural communities.

Process

The FRSA says that the Fire Authority identified the first stage of any change process as the development of new on-call contracts and ways of working, and that DSFRS has not completed this. The risk assessment on which the data for the changes are based rely on on-call performing at full capacity, which can only be achieved via the development of new contracts. The FRSA considers that *“proceeding without this will create an unmanageable risk”*.

The FRSA also says that while the ‘Safer Together’ Programme is based on the principle of reallocating resources, no factual information is provided on where this money will be spent – and that no detail, specification or evidence has been offered for the introduction of roving appliances (which have *“the potential to devalue and undermine the working principles of on-call firefighters”*). The FRSA requires the creation of an ‘on-call impact assessment’.

Data

The FRSA describes DSFRS's use of information and data as *"contentious and divisive"*, particularly in relation to: restricting incident counts to those on station grounds; *"inaccurate"* aggregated travel times from next nearest appliances; and use of performance data such as appliance availability.

The Association also says the plan does not: describe how future population growth has been incorporated and accounted for; project future congestion and reduction in road travel speeds from increased populations associated with new builds; or adequately demonstrate DSFRS's resilience in the event of a large incident or two.

Consultation process

The FRSA suggests that the 'Safer Together' consultation document is over-complex and contains mixed messages. It thus has concerns about the meaningful feedback that will be extracted from the process as a result.

The Association is disappointed that no consultation events were scheduled outside of working hours, and about the 'inadequate' communication of the consultation issues and proposals to staff (it especially notes that *"the morale and esteem within the on-call was already at an all-time low and we do not believe this has been adequately understood"*). It also considers it *"questionable"* whether the process follows the guidelines for public consultation processes given the original formulation of the six options deprived each change of the *"right and proper scrutiny"*.

Moving forward

The FRSA believes that achieving additional funding from Government to meet the changing needs of an on-call workforce is the number one priority for the Organisation and that DSFRS should:

- Instigate a powerful lobbying effort for additional funding in recognition of the challenges faced by on-call system;

- Abandon plans to close any Community Assets and instead look to use these resources differently by using different vehicles to achieve efficiencies for example);

- Abandon plans to reduce wholetime stations to day crewing;

- Create a plan *"which is an evolution to a better way of working with a clear set of outcomes for an improved future that staff can support"*; and

- Measure any changes against potential negative impacts on on-call and ensure workloads and opportunities are primarily available to on-call staff.

Station closures

For a saving of £387,000 per annum, the FRSA does not consider the saving proportionate to what is lost and recommends alternatives to make these stations more cost effective - locating specialist skills and vehicles at the lower activity stations for example. The Association also believes the opportunity exists to redefine the eight stations within the context of new challenges such as extreme weather events and wildfires.

The FRSA believes there is scope for station amalgamations going forward - Ashburton and Buckfastleigh for example. However, it also says the recruitment and retention crisis has to inform decision-making and that the Service cannot afford to lose experienced staff and alienate the communities that provide them. With the eight stations identified for closure *“there is a long tradition within that community to provide crew members and the sacrifices required to maintain an appliance”*.

Appliance daytime ‘shutdowns’

The FRSA suggests that turning off 2nd appliances is not a cost-effective option and that the introduction of a scaled ‘payment for availability’ for on-call firefighters would be a step in a positive direction in enabling staff to live and work in a greater periphery and achieving resilience.

Roving appliances

The FRSA is troubled by the possible impact this new way of working could have on on-call stations. However, it recognises that mobile operational and prevention resources have a part to play in response and safety activities and that by fully considering impacts and ensuring the creation of employment and development opportunities for on-call staff, it could support this way of working. The Association also feels that a correctly managed and trained crewing pool would be a cost-effective way to provide support for on-call stations and carry out some prevention and protection work.

Aggregate crewing

It is said that aggregate crewing can be used to rectify the problem of appliances being taken ‘off the run’, but that the FRSA will only agree to it *“where recruitment or maintenance of on-call availability has been exhausted and not considered as the normal working practice. Priority must be new contracts being introduced with every effort made to crew with four”*.

Day crewing of wholetime stations

The FRSA considers that the same saving and release of personnel can be achieved (while keeping 24/7 wholetime availability) by reducing to minimum crewing on watches and drawing resilience from on-call on these stations and the *“correctly managed crewing pool”*. It is also said that reducing numbers to minimum on all wholetime stations will allow for on-call firefighter development posts - and that the fifth rider could be a development post for apprentice firefighters.

New vehicle types

The FRSA says it could support the introduction of vehicles that allow more flexible and innovative ways of working if this were to offset the removal of emergency response.

Apprenticeships

The FRSA is fully supportive of apprenticeships within DSFRS, for which funding is available.

A holistic approach

The FRSA is willing to work with DSFRS and DSFA to formalise a package of proposals that will realise finances and create a sustainable and innovative on-call model that offers a flexible and satisfying working experience and encourages the recruitment and retention of staff. The Association

recommends that this approach looks to return some prevention and community engagement activities back to stations as these have been recognised as adding huge value to the role.

Fire Brigades Union (FBU)

It is the view of the FBU that 'Safer Together' represents an unacceptable series of large-scale cuts to the operational front-line which, if implemented, would have serious repercussions for both firefighter and public safety. It calls on the Fire Authority to reject these "*dangerous cuts*" outright.

Cuts to uniform roles and an increase in support staff since combination

Since the combination of Devon and Somerset FRSs there has been a series of cuts to uniformed roles totalling 461 to date. These proposals threaten a further 216 posts and may result in 100.75 possible redundancies. This, the FBU says, is "*unacceptable*".

The FBU also notes that 60 support staff roles have been added to the establishment since combination. which should not have delivered this outcome as it was 'sold' that two headquarters would become one and that support staff numbers and costs would fall.

Reserves: mismanagement

It is the view of the FBU that reserves have been mismanaged and are "*out of control*" in DSFRS. The union says that reserves have grown to an "*unacceptable level*" and that an immediate change in strategy is *needed* whereby reserves are invested in the frontline to improve crewing levels, appliance availability, response standards, retention and recruitment.

The FBU says this "*failed strategy on reserves*" is further compounded by underspends in the revenue budget being transferred into reserves, and that £12.7 million has been taken out of the frontline to be placed in reserves. This the union describes as a "*mismanagement of reserves*".

Safer Together document: misinformation

The firefighter duty systems have not changed since 1970s

This is described as "*factually incorrect and totally misleading*" inasmuch as:

The flexible duty and day duty systems have changed since 2004 - and several discussions have taken place around the wholetime duty system which continue to this day; and

The RDS duty system has also changed since 2004, with a salary scheme being introduced, as have 84 and 63 hour contracts with 100% turnout requirement. An RDS availability system has been in place for over 10 years which monitors RDS availability every 15 minutes.

Nationally, fires have reduced by 33%

The FBU feels this is misleading as "*it depends on what time frame you look at*" and that while it is true that the number of fires in the home have nearly halved since 1999, they have increased by over 250% since 1951. The union also says that fires in DSFRS have not decreased by 33% in the last five years.

The 941 rescues undertaken last year are noted: the FBU feels that the proposals will affect the Service's ability to affect rescues as both speed of attack and weight of response will be diminished.

We have too many fire engines and staff in areas where risks are low, and demand has fallen

The FBU feels that DSFRS has failed to recognise that a fall in demand does not mean there is a drop in risk, which is still there and needs to be planned for.

How we analyse and model risk

The FBU is concerned that no full risk assessment around the proposals has been published *“despite a Fire Authority amendment stating...that full risk assessment information on the options will be available as part of the public consultation as required”*.

The union also describes DSFRS’s Analytical Comparison of Community Impacts: Service Delivery Operating Model (SDOM) as *“flawed and misleading from the start”* as it has *“clearly been produced to show a ‘best-case scenario’ to lower risk even when stations are being closed, appliances being removed or cut”*. It is said that there has been no risk assessment on a ‘worst case scenario’ which should have been undertaken and published.

The comparison of the full availability of all resources under the new SDOM with 80% availability under current modelling is described as *“disingenuous”* and *“misleading”*, and the statement that ‘the current arrangements rarely deliver all 121 appliances available to respond...’ is considered *“an understatement of the highest order”* given it has been 20,000 hours since all pumps were last available. For example, on the median day for appliance availability in 2018, appliance availability was 82.6%. This meant calculated risk was 4.66% above the 121-pump scenario for dwellings and 2.15% for RTCs. The FBU says that, 50% of the time, DSFRS was operating at a higher risk level than this.

Moreover, it is alleged that the Chair of the Fire Authority has *“admitted that the on-call system has been broken for many years”*, which does not fit with the new SDOM which assumes all appliances being available.

Station data

The FBU says it has caused great anger on the stations being proposed for closure that the data being used to support this only includes fire, RTC and co-responder incidents on their station ground - rather than all incident irrespective of type and location. It is the FBU view that all incidents and types should be used to give a true picture of activity.

Travel times

The FBU says that the travel times used in this consultation are the shortest road distances and do not take account of RDS turn-in times, traffic conditions, time of day or seasonal fluctuations.

Safer Together document: Information the FBU agrees with

The FBU agrees that:

There is an ageing population in Devon and Somerset who are at the most risk from fire and that this population will increase by nearly 43% in the next 10 years. It questions how, in light of this, cuts can be proposed to the front-line fire service; and

Recruitment and retention of RDS firefighters is an issue, but that this needs investment rather than the threat of 128 fewer posts. It is suggested that DSFRS take the ‘Invest to Improve’ and

'Budget Smoothing Reserve' to give a boost of £7.8m to the RDS budget - and *"if the underspends continue in the revenue budget, instead of transferring them to reserves, build the base revenue budget up...so the payments are not a one-off"*.

Response standards: dwelling fire and road traffic collisions (RTCs)

The FBU feels that DSFRS's proposals will not increase public or firefighter safety. It is also concerned that DSFRS *"took a decision to limit the public reporting of how it is meeting [response] standards, or not"*. Reporting is now apparently limited to when the first pump arrives, meaning that, in reporting terms, the clock stops ticking as soon as the first pump arrives (possibly with a minimum crew of four), rather than *"when the full standard is achieved by the 2nd or 3rd pump arriving with the correct, appropriate and safe number of Firefighters needed to deal with the incident"*.

Response to options

In response to all options, the FBU says that *"[it] does not make our communities any safer, is not supported by the public, and should be rejected"*.

Option 1

The FBU says that:

Some of the stations proposed for closure may not be the busiest, but they all have significantly more call than they did when they were built;

The risk to individuals if they have a fire in their home remains the same no matter the frequency of fires in the area;

The service has an emergency response standard of 10 minutes for the first attendance, and by closing these stations over 17,000 people would no longer be within this standard;

A retained fire station offers much more to its community than only attending dwelling fires and RTCs, and none of the extra work stations do has been taken into account; and

Closing fire stations cannot make communities safer.

Option 2

The FBU says that:

2013 saw a change in crewing of the second appliances at Taunton and Torquay from wholtime to retained, which came with an assurance that there would be no future reduction in this vital cover. It wants the service to honour this commitment; and

All stations with three pumps have several important special appliances that are crewed by wholtime staff, and if required they are often unavailable for fire calls for long periods due to the protracted nature of incidents needing specials. While crews are dealing with special incidents, it is important to have two fire appliances still available to cover the risk in the town at which they are based, which would not be the case if the third fire engines are removed.

Option 3

The FBU says that:

One of the main rationales for this proposal seems to be that the affected fire engines are often unavailable, which *“needs to be addressed first”*;

The service has a response standard of 10 minutes for the first fire engine, and 14 for the second. If this proposal is adopted, the standard will not be achieved in the towns affected;

The consultation document reports that these fire engines may be needed in the future if there is a change in the risk profile in the towns. Risk has already significantly changed, as the population numbers were taken from the 2011 census and these towns are growing fast.

Option 4

The FBU says that:

The service has set an emergency response standard of 10 minutes for the first fire engine to a dwelling fire, and this proposal would see an extra 50,000 people outside this due to increased on-call response times;

Two of the stations earmarked for this reduction are special rescue stations, offering an enhanced water rescue capability. This proposal would see that removed at night;

The transfer of fire engines from wholetime to retained at night was shown in 2013 to be unachievable in the short-term due to difficulties with on-call recruitment - especially in areas like Exmouth where the station is outside of the main populated areas of the town;

The Service has repeatedly stated that the only fire appliances it can guarantee are those crewed by wholetime staff. To remove these at night in three large towns *“is wholly irresponsible”*;

The consultation document states that ‘our risk profile indicates that fire risk increases in the evening and overnight when people are in their homes’. Why then reduce the cover at these times?

Option 5

The FBU says that:

With current contracts and crewing arrangements, this option offers no savings to the service and a decrease in ability to respond;

The Service already struggles to retain on-call firefighters, and this option would further disenfranchised staff who offer huge commitment; and

By removing so many second fire appliances, the ability to achieve full attendance times of 14 minutes for two fire engines will be dramatically reduced and impossible during the day in the affected areas.

Option 6

The FBU cannot support the roving appliance 'concept' without the necessary details - nor does it support the idea of introducing extra fire engines during the day at the expense of wholetime fire cover at night. It says that extra fire engines could be crewed by increasing wholetime establishments during the day, potentially reallocating money from elsewhere (the crewing pool for example).

Option 7

It is said that the consultation "only really offers one option with levels of severity" and that the consultation document states "*the first three do not release sufficient funds to improve the service, and option four and five offer no improvement to the level of service*". With this in mind, the FBU describes option 7 as "*just an opportunity to suggest cuts to the service*".

Campaigning and petitioning

The FBU has been campaigning and meeting with the public during the consultation period, explaining the DSFRS proposals and their impacts. It has gathered over 28,000 signatures to an online and paper petition and says that "*the public opposition to these proposals has been near to 100%*".

The union also notes several more local campaigns against the proposals - as well as many motions passed at councils rejecting them.

Conclusions

Ultimately, the FBU is of the view that the proposals "*do not improve the Service in any way but will see a third of people in Devon and Somerset waiting longer for a fire engine when they need one*". It says it cannot support the "*list of cuts and reductions*" that offers no positive suggestions for change.

Finally, it is again said that the 'Safer Together' documentation is full of misinformation that has angered firefighters – and that DSFRS is left with no option but to withdraw its proposals.

Colyton Fire Station

The Colyton team

The Colyton team states that the recruitment problems reported in the consultation document do not apply to Colyton, where there is a "*strong and diverse*" team of 12 and a further two going through the recruitment process. It is also the only team in the area to have trained to SHACS level 2; has operated at PPV level 1 for the last 10 years; and was the only team in the area to carry a PPV fan for a long time. They were also backup for another local crew with a Hoselayer and staff have experience of delivering Community Fire Safety.

Team members "*regularly commit well above their contracted hours in order to keep the appliance on the run and available*" - and while the consultation document states that many on-call appliances are unavailable 20% of the time, for Colyton this is closer to 10%. The team also regularly attends events on an unpaid basis. It is felt that if a salary scheme (as previously piloted) were to be adopted, availability could be closer to 100%. The team would prefer the on-call service to be reassessed and 'fixed' before any stations are closed.

Alternative options

The station has provided two alternative proposals:

Option 1

The team wants the station to remain open. It is not convinced by the conclusions drawn in the FRS' analysis and risk modelling which mapped the area as 'low risk' as the area has a large elderly population, thatched properties, heritage buildings and farms. It also has the second highest water rescue risk in the area. There are also a number of RTAs on A roads in the area and it is already a *"challenge to extricate casualties and get them to primary care within the 'golden hour' because of our rural location"*. Indeed, the team has *"serious concerns"* about DSFRS' ability to meet response times in the area if the station was to close.

If the station were to remain open, the team says it could:

- Respond to the area's needs and meet target response times;
- Back up neighbouring stations;
- Provide added resilience in the area;
- Upskill to Level 2 Water rescue;
- Become a designated on-call Specialist Rescue Team;
- Become a satellite station for the ICU at Honiton, which sometimes has crewing difficulties;
- Become a satellite station for the HVP appliance at Station 60;
- Resume its previously active role in Community Fire Safety;
- Carry out prevention and protection work; and
- Potentially resume hydrant testing.

Option 2

As a compromise if the only other option was closure, the Colyton team suggests the station could:

- House a semi-roving appliance as suggested in Option 6, to be crewed Monday to Friday and serve East Devon and West Somerset; and
- Take on extra duties as suggested in option 1 and fulfil them as a roving appliance.

The compromise would be to keep their appliance and station so that it would be available overnight Monday to Friday and on weekends to serve the local area.

The advantages of this concept would be:

- The fire appliance being used in some capacity 24/7, representing better value for money and a more efficient use of resources;
- A more productive and flexible workforce with the potential to crew special appliances;
- Overcoming the currently unresolved issues with the FBU on using wholetime

firefighters by using on-call firefighters instead;

12 skilled and experienced firefighters would not be lost from the organisation;

It could form part of the plan to overhaul the on-call service and offer more flexible, balanced working hours to staff;

It should be no more expensive than the projected cost for roving appliances; and

The approach would *“begin to heal the wounds caused by the way the organisation has handled communicating the proposals and failed to provide support to staff”*. It would offer staff a fresh challenge and an innovative way of working.

Other ideas

Aggregate crewing: some Colyton firefighters live on the Seaton side of Colyton and some Seaton firefighters live in the Colyton area. The stations could work closely together.

A Rapid Intervention Vehicle for Colyton: whilst this size of vehicle could be an advantage in narrow lanes, overall the crew thinks the reduced capability would be an issue in many ways.

Kingston firefighters²

The Kingston firefighters do not believe any of the combined elements in options 1-6 should be adopted as they involve the closure of fire stations and subsequent removal of appliances and trained, competent and committed personnel as a first option. They would prefer DSFRS to first explore:

The removal of third appliances and some second appliances;

Crewing patterns, expansion of the volunteer system and improved ways of deploying personnel;

Aggregate crewing (for example mobilising three from one station and three from another rather than four or five from one station to improve availability);

Pre-agreed mobilising points (whereby some alerted crew members would be able to rendezvous with their appliance without the need to attend the Station. The mobilised appliance would leave the Station as long as they have a MINIMUM crew and pick up further crew en route if they were already at the rendezvous point); and

Making Kingston Fire Station available to more Tri-Service use for response, welfare and resilience purposes.

As a volunteer station operating under the flexible crewing system, Kingston has been “successfully deployed with either two or three members to situations where our rapid intervention has prevented dangerous escalation”. The firefighters feel the expansion of the volunteer system can be a solution to the contract difficulties the retained duty system often finds difficult to fully address because it: opens up new sections of the community for service recruitment as not all potential recruits can

²This was submitted via the questionnaire, but is the one of only two submissions sent via this medium that required a summary so has been included here with the other detailed responses.

commit to rigid contracts; and would result in better retention as many retained firefighters find it difficult to maintain their work/life balance and so resign from the service. The firefighters say *“we have been successfully running the volunteer model for 70 years and have had no difficulty in integrating or working with both whole time and retained colleagues”*.

The Kingston firefighters do not support the introduction of roving vehicles as they believe they present the following practical difficulties:

It seems their introduction is resource heavy and would require all of options 1-5 going ahead;

There can be no certainty that they would be in the right place at the right time;

Crew welfare would logically be at fire stations and if they are closed this limits options; and

If they are deployed at stations, they have defeated their intended purpose and their crews would be better employed keeping existing stations open.

With specific regard to Kingston Fire Station, the firefighters say it has been operating successfully as a volunteer station for 70 years and has shown *“that there is a clear need for us and what we offer to the DSFRS”*. They believe the rationale to close the station is fundamentally flawed for the following reasons:

The data in the service delivery operating model proposals is *“presented in very subjective and negative way”*; and

There has been *“no prior consultation or engagement with us as a station before these proposals were published meaning that we have had no chance of any positive ideas or input into this process at its initial formative stages”*.

To the firefighters, the biggest question is how can by closing them down will DSFRS guarantee or improve levels or cover, resilience and availability in their fire ground and adjoining areas? The simple answer to this, they feel, is it can't! They believe that *“by proposing to close us down DSFRS is significantly reducing its ability to respond with adequate trained personnel and resources to fire and rescue incidents within both our and adjoining fire grounds in a time scale which could make the difference between life and death”*.

The firefighters challenge - at a local level at least:

The assertion that fires and their risk have decreased over the past 10 years as their records *“clearly show that locally we are not seeing any decrease”*;

That they are, as claimed, a low risk area. Some examples of what they believe to be potential high risks on their station ground are: population and traffic increases in the summer months due to tourism; a very large concentration of caravans (with gas cylinders) at Challaborough; the Burgh Island hotel; a large proportion of thatch properties and others with restricted water supplies; and significant agricultural industry

The number of call outs presented in the Safer Together document: they feel that *“a more accurate figure to use is the actual total number of alerts. This shows a more complete picture”*

of what we offer in terms of our contribution to make-ups, out of area, specialist equipment and spate incidents”;

The firefighters also shared some community feedback, with people apparently telling them that: the public consultation event *“had too short notice to ensure full engagement”*; the presented information was inaccurate, in particular the response times to Kingston from other stations; they were concerned about priority being given to the protection of urban populations at the expense of local people and their properties; and that *“we all pay the same Fire Service precept and so should all expect the same level of response and cover”*.

The Kingston firefighters also discuss financial cost as a reason for their proposed closure. They consider themselves to offer *“good value for money”* as their *“ground rent is only £2 a year and the running costs stated in the Safer Together document for us, when divided by the number of available hours that we give, works out to just £3.75 per hour for a crew and appliance”*.

The stated ‘one off potential capital saving of £300,000’ is also noted, with the firefighters assuming that this refers to the cost of a *“brand new MRP which is totally unsuited to our needs, location and physical constraints of our Station”*. They would prefer *“a second hand RIV which would cost a fraction of this sum”* and would better suit the needs of the area and the skills and experience of the crew.

The firefighters ask whether all areas of DSFRS expenditure and policy have been subject to a *“root and branch financial efficiency review before the publishing of the Safer Together proposals?”* They also support income generation opportunities such as apprenticeship schemes for recruits (for which government subsidies are available and the extension of DSFRS expertise into the private sector.

The firefighters question DSFRS’s prevention and protection strategy and particularly whether it guarantees wholesale fire safety visits to all properties or increased enforcement actions - and whether the advocate scheme will be expanded or extra staff employed for these additional visits. They propose that the best way forward *“would be for us to do fire safety visits and give advice to our Communities as we used to do with suitable support and backup from the Service as required. This could easily be done as part of our normal duties at little extra cost to the Fire Service and with our local knowledge be targeted at the sections in our communities most at risk”*.

In terms of recruitment, the Kingston firefighters argue that although they generate a lot of interest from a broad range of potential recruits, a significant barrier to joining is the rigid training structure as *“very few people can give up whole blocks of time to attend basic training at Severn Park”*. It is suggested that *“running this course over a series of weekends at the nearby STC would give a massive boost to our chances of further recruitment by making it more family friendly and inclusive”*.

Ultimately the firefighters believe they *“make a real difference in an emergency and we are willing to be positive and flexible in this campaign to keep ourselves open in a capacity which will serve our Communities as they deserve to be”*.

Topsham firefighters

The Topsham firefighters are wholeheartedly against the closure of their or any Fire Station and want the Fire Authority to acknowledge their acceptance to change their ways of working to prevent it.

The firefighters express grave concerns over the Safer Together document and the “*misleading*” information within. For example they say that:

Significant cuts have already been made to DSFRS yet the reserves (nearly £40 million to date) have increased year on year. These latest proposals are “*severe at best and dangerous at worse to both members of the public and Firefighters*”;

All options will result in increased response times. Under the proposal to relocate an appliance to Middlemoor Fire Station but crew it with Topsham Firefighters, that appliance will not ‘turnout’ in under 15 minutes;

Station activity level statistics have been “*manipulated*”. Topsham Fire Station was advertised as having an average of 20 - 25 call outs per year in the Topsham area whereas it has an average of 155 call outs per year (last 5 years), including those in other communities;

There is a lack of detail on how DSFRS is proposing to use the money saved;

New on-call contracts are being advertised but there is no agreement to say what these will look like - so “*how can the assumption be made that all Appliances will be available 100% of the time from April 2020*”. Moreover, relocation packages are being offered, but there are no firm offers to be considered by firefighters who may be interested in this option;

The options presented will severely hit DSFRS’ resilience. The promise of ‘there are other appliances that can respond’ is worked out on “*best case scenarios of all resources being available*”. On-call availability needs to be fixed before further cuts are made;

There have been two serious fires in Topsham in the last 3 months, which were dealt with swiftly and effectively by the Topsham appliances. Delayed response from other stations would have resulted in poorer outcomes. In a community of old buildings and an ageing population “*this cannot be an accepted compromise*”;

It is “*astonishing*” that Topsham residents are being told Middlemoor is only three miles away and will provide a response, even though it will take them longer to arrive, and they may be at another incident in the city;

Topsham is fast becoming a suburb of Exeter - and with Danes Castle and Middlemoor Fire Stations, its own station is perfectly positioned to complement the fire cover of the city and surrounding areas due to its proximity to the M5 and A30. Moreover, increasing populations will not only bring increased risk, but also opportunities to recruit on-call staff for Topsham; and

Even employees of DSFRS have found the consultation questionnaire difficult to understand. If anyone was to disagree with option 1 then this would automatically discount options 2 - 6 as the station closures are also included in these.

Alternative proposal to the closure of Topsham Fire Station

The firefighters feel the proposal to close Topsham Fire Station and relocate an appliance to Middlemoor is short-sighted and will result in a loss of vital commitment and experienced personnel,

as well as a reduced service and increased risk of harm to Topsham and surrounding communities. There are, it is said, alternative ways of working as follows.

Change in appliance type: smaller fire appliance

The firefighters suggest that one of Topsham's two appliances could be replaced with a Rapid Intervention Vehicle (RIV) or other smaller type of vehicle (similar to the one based at Appledore), with a recognised local crewing arrangement for a reduced crew (similar to the model used at Dartmouth). In doing so they feel they *"would be able to work more effectively with the staffing resources available"*.

Moreover, as Topsham has a number of small and narrow streets, locating a smaller vehicle there would also demonstrate an understanding of matching 'resource to risk'.

The perceived benefits of this would be: no need for recruitment; cost reductions; the mitigation of access issues through the provision of a smaller vehicle; no negative impact on response times within Topsham; fire cover provision for the Exeter area (five appliances) is maintained; public confidence remains intact; staffing complements are not affected (so *"no stress issues, resignations, redundancies or relocation implications"*); and the station remains in a strategic location to access Exeter city centre and Exmouth directions.

Temporary relocation of an appliance arrangement: appliance to SHQ

The firefighters suggest that the aforementioned RIV could also be relocated to Service Headquarters (SHQ) during daytime hours, Monday – Friday and crewed by personnel from SHQ. Topsham then reverts to a two-appliance station on evenings and weekends, crewed by Topsham Firefighters.

Topsham currently has an arrangement that an appliance is temporarily relocated to SHQ when sufficient crew are available there, an arrangement that provides an enhanced service in the Exmouth and Exeter city directions if fire cover is altered at Exmouth or Budleigh Salterton. If the proposed crewing changes at Exmouth Fire Station are approved, the night cover location of appliances at Topsham *"strategically places us to respond to the Exeter area and Exmouth area"*.

The perceived benefits of this would be as above plus: the potential for increased availability with reduced crewing numbers; a larger response area met through quicker turn out times; and an increased work/life balance for establishment staff.

Removal of second appliance

The third proposal is to remove an Appliance from Topsham Fire Station, reducing the establishment to one appliance and reducing the staffing resource and incurred costs.³¹³¹

The perceived benefits of this would be: no need for recruitment; cost reductions; the potential for increased availability; no negative impact on initial response times within Topsham; and the station remains in a strategic location to access Exeter city centre and Exmouth directions.

The perceived drawbacks of this would be: a reduction in the number of fire appliances; risks to firefighters and the community due to increased 'back-up' response times; and the potential for resignations, redundancies and stress due to over-staffing.

Introduction of a special appliance to Topsham

If Topsham were to reduce to a one-appliance establishment, this would create a resource of personnel and an empty appliance bay. The firefighters suggest an option to allocate a special appliance to Topsham Fire Station (a current appliance that is located at another station where crewing numbers are low and there is difficulty in maintaining availability of all appliances).

The firefighters also say they are currently the support crew for the Heavy Rescue Vehicle at Middlemoor Fire Station and would be willing to take sole ownership of this vehicle.

The perceived benefits of this would be: firefighter resources are already in place; Topsham is located near major infrastructure routes to Devon; availability of one vehicle can be maintained without impact on the availability of the other if required; and depending on the type of Special Appliance (turnout time restrictions), further firefighters could become available to crew it who may be beyond the five-minute response time.

The perceived drawbacks of this would be as above (under removal of second appliance).

Vehicles for firefighter delivery over equipment delivery

Reducing to a one-appliance station would leave a *“healthy staffing resource and an opportunity for a different vehicle to be located at Topsham”* - and efficiencies could be achieved if DSFRS were to adopt an approach of ‘firefighter delivery’ vehicles to deliver personnel to larger incidents.

The firefighters suggest using vehicles along the lines of an RIV (consisting of basic firefighting/rescue essentials such as a hosereel, fog spike, first aid bag and RTC combi tool) alongside standard pumps at two-appliance on-call stations as a method of transport to larger incidents when ‘make-ups’ are received at fire control. These smaller vehicles could then be supplemented with more Incident Support Vehicles carrying essential equipment.

The perceived benefits of this would be a combination of all those outlined above.

Working with others: Station 60

The following were suggested by the Topsham firefighters:

Assisting USAR at Station 60 *“would be a logical approach due to the close proximity”* – as would crewing Sidmouth’s High Volume Pump and assisting with crewing other assets there;

Introduction of co-responding arrangements in partnership with Ambulance Service

If the Station is downgraded to a one-appliance station, the unoccupied bay could be utilised as office space (providing savings and/or generating income); and

Recommencing prevention activity and engagement with the local community, and ensuring this forms part of the new on-call contracts and pay structure.

Relocation of Topsham Fire Station to SHQ

The firefighters would be willing to explore relocation to SHQ further if there is no alternative other than to close Topsham Fire Station, although they remain concerned over increased response times.

Serving Fire Officers

This response is based on conversations and on-line responses with serving Fire Service Officers.

Main areas of issue and concern

The officers are concerned that the consultation document does not recognise that DSFRS in its current form was established in 2007 and faced ‘significant’ cuts in 2013. They also say that although house fires are reducing nationally, they are up 3% in Devon and Somerset – and that 879 calls were answered by the appliances to be removed in options 1,2 and 3 in 2018, leaving questions about response times leading to loss of life and property if these are removed.

The officers state that the report assumes 100% staffing at remaining fire stations after the cuts, which they consider unlikely. Moreover, if option 6 is accepted, 235 on-call and 41 wholetime personnel could be made redundant – and the officers claim that, over the last year, there have been an additional 30 staff within DSFRS on salaries in excess of £50,000 and that a number of positions were advertised externally that could have been offered to on-call staff.

It is said that the staffing issues reported are largely due to a recruitment freeze that was only lifted 18 months ago - and the calculation of working hours for on-call firefighters, which have been significantly reduced, meaning the hours of cover on paper appear to have been reduced despite staffing levels remaining fairly constant in recent years.

The officers state that there are now 1,500 frontline staff in the Service, compared to 2,000 in 2006 - staff who are working over their contracted hours, suggesting DSFRS may be running on “goodwill”.

The officers say that despite the DSFRS reserve of over £38 million, on-call stations are running effectively under budget – and question why “if all the stations listed in the report were to close this would only save an estimated £300,000. Why is there a financial need to cut these stations?”

There is a concern that the system has been set up to fail, especially with the introduction of dynamic mobilisation, with roving fire engines which will take away call outs from on-call stations potentially threatening them with closure at a later date.

The officers argue that the statistics included in the consultation document are incorrect (for example, If a fire appliance is sent out to back up a call out from another station the back up call out is not recorded - or if an appliance attends a call out on its way back from an initial call out, that second call out will not be recorded). It is considered unacceptable that individual Fire Station Risk Assessments have not been shared with the public. In the case of Appledore, high risk areas are identified such as a shipyard, care home and holiday camps as well as thatched cottages and open fields.

There are also concerns over what are considered unachievable projected response times – and the officers draw comparisons to the cuts made in West Sussex based on similar rationale, whereby between 28% and 51% of fire engines are now available during the day, compared to the 85% promised.

Finally, the officers refute the claim that fewer fires require fewer resources, stating there is no correlation between demand and resource - as well as the claim that there are ‘low risk’ fire stations

as “the threat of death for anyone trapped in a burning building or crushed vehicle is the same everywhere”.

Possible resolution and a way forward

The suggested solution is the relocation of Appledore Fire Station closer to area’s the main arterial routes and to an area within five minutes reach of more potential staff. It could be situated near the Heyward Road roundabout and could potentially be combined with the Bideford station, placing all crews in the area in a central location at a “strategic crossroads”, as well as taking into account planned housing developments at Clovelly Road and Northam. The officers also suggest making Appledore a “garage type facility” with a staff welfare area only to keep costs down.

The officers also accept the need for flexibility and aggregate crewing at both Appledore and Bideford. They suggest scope to make some on-call firefighters Community Safety Officers to recognise their work and increase their income.

Appledore has a Rapid Intervention Vehicle and a Light Firefighting Appliance (LFA) which suit narrow streets and older towns well. The LFA is a prototype that has been under-used and could be “used to better effect”.

Somerset County Council

The consultation document and methodology

The Council feels the consultation documents has “limited detail”, making a response difficult. The options set out provide an accumulative set of choices and leads the reader to believe that only certain groups of options would meet the desired outcomes. It also states that where stations are closed, resources will be redeployed, without further detail. It is felt that the “length and complexity” of the questionnaire make it difficult for members of the public to respond.

Prevention activity and opportunities

The Council welcomes the focus on prevention activity which fits in with its own strategic plan. However, it also feels there was opportunity within the document to “demonstrate the breadth of work the fire service undertakes and leaves readers unclear with what the future service offer for prevention will look like”.

Risk Factors

The Council states that the best known predictors of fire incidents include age, health, lifestyle, income, status and education - but that the consultation only briefly touches on lifestyle in relation to smoking and chip pan fires. It is felt further links could have been made between poverty and overcrowding, lack of awareness, increased uptake of smoking and other risk-taking behaviours given the demography of the area.

Furthermore, with the population of Somerset over 75 projected to double in the next two decades, The Council does not feel it the projected risk of fire and need for resource fully recognises this. Although the document considers population size and distribution, the Council questions whether the risk assessment was done on a settlement by settlement basis and took into account what was

included in local plans. It also states the importance of considering the age of the housing stock, with 5% in Somerset being without central heating and a significant proportion having thatched roofs.

It is not considered clear whether: the level of tourism in the area has been factored into the risk modelling; whether the storage of hazardous chemicals in the agricultural sector has been included; or whether the modelling considered the fire hazards and response times for historic and heritage buildings (or example within the city of Wells). Other factors without clarity on inclusion in risk modelling include the increase in traffic volumes on the M5 and A303 as well as the impacts of climate change including floods and wildfire.

Deployment Activity

The submission questions the impact of fire station closures on co-responder functions, and states that although it is sensible to plan resources around demand predictions, it is also important that crews can stay active while waiting for deployment (for example through prevention work).

The Council feels that the proposal to reduce the number of engines at Bridgewater is “surprising” given its proximity to Hinkley Point. It also states that proposals on roving fire engines (option 6) are not clear and suggests that having “more agile, less resource intensive vehicles” could be better.

The Council states that the average number of engines is discussed, but not travel distance - and it queries the claim that there are stations within a 15-minute radius of those set to close. It uses the example of Porlock, where the nearest station is Minehead – only 15 minutes away in “perfect” conditions but in reality, the journey involves a single access road likely to experience delays.

Partnership Working

The Council feels the consultation document is not clear on the impact of the options on the FRS’ capacity for multi-agency working. It states the service is currently an “active and valued” partner in local forums and partnerships. It also seeks clarity on the impact of the proposals on the FRS’ specialist capabilities such as urban search and rescue and response to flooding and wildfire.

The Council asks whether the FRS has considered closer working with other emergency services, for example through sharing buildings and local assets. It states that “the consultation is based upon savings made by the DSFRS in isolation and does not factor in opportunities for working with partners in a place based/systems approach”.

The Council has worked with Public Health on various strategies and would have welcomed involvement from the FRS, who it believe could have gained “useful local intelligence to inform their analysis and planning”. It questions whether the FRS has explored possibilities for joint working with the Somerset and Devon Road Safety Partnerships in planning for change.

The Council’s key suggestion is that the FRS retain a “small fire safety vehicle” at Porlock and house it in a different way - “not necessarily in a DSFRS owned facility”. It states that this can be done in partnership and that the Council can supply examples of “communities that have engaged with agencies to assist with service delivery at a local level”.

North Devon Healthcare NHS Trust

The Trust appreciates the “*close working relationships*” it has developed with DSFRS as part of ‘One North Devon’. Its submission brings together responses from colleagues in their emergency department, emergency preparedness, resilience and response (EPRR) team and facilities team.

Impacts on the potential acuity of patients needing treatment of incidents off-site as well as the impact on containment of fires on its premises have been considered. The Trust does not feel that additional time to mobilise will impact response times to incidents off-site but does have concerns about ability to contain the spread of fire on its various sites.

With regard to options 1, 2 and 3, The Trust’s locations are serviced by stations closer than those earmarked for change, resulting in minimal impact to response times and risk to premises. However, it does see a potential increase in risk and response time if the station most local to a Trust site is committed to an incident elsewhere.

For option 4, the Trust is concerned about the risk related to night time on-call because a delay in response times overnight could lead to fires spreading out of their room of origin, an issue compounded by reduced hospital staffing during these hours (more patients would need to be evacuated by fewer staff). Moreover, further pressure would be placed on Barnstaple’s whole time crews, who already cover retained crews in the area. The general feeling is that “*on-call overnight cover will result in a longer response time*”.

Option 5 poses the risk of further increasing response times if local stations are committed to incidents elsewhere. Again, Barnstaple’s whole-time crew provides cover for unavailable on-call crews and “*closing outlying stations will not boost this as those stations are more than five minutes from the next station*”.

The Trust says that option 6 is “*likely to deliver heightened risk to normal operation as Barnstaple’s first appliance is already almost serving this function as a whole-time appliance*”. Response times would be heightened and the Trust feels it is “*unlikely that DSFRS would have a roving appliance deployed to North Devon to cover for the Barnstaple appliance*” as newer population centres are further South.

Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly

The Commissioner states that policing has had to change the way it operates in response to less resources and officers in recent years and states that the demand on resources should be balanced against the risks. Early intervention and prevention activity reduces risks and should form part of future strategy.

She welcomes the FRS’ proposals to prioritise a reinvestment in services and drive innovative approaches above cost-cutting. She also states that both organisations have worked together successfully such as on the Community Responders scheme in Devon, as well as sharing buildings to make better use of their estate.

The Commissioner states there is a need for the public to understand current operational capacities in order to understand the context of the proposed changes. She feels the public perceive response

capacity to already exist in some of the areas where change is proposed, but understands this is not necessarily the case³. The Commissioner would support greater transparency on current operational capacity to support the public's understanding of the changes proposed.

The Commissioner provides assurances that they will build on their current partnerships to support the FRS find solutions in challenging areas. She also welcomes opportunities for further collaboration and local integration of services.

National Trust (South Somerset)

The National Trust recognises that all proposals are centred on life risk and agree this should be the key priority. However, it is concerned that there is little reference in the strategy to the impact of fire on heritage buildings and their contents.

The consultee considers all National Trust properties within Devon and Somerset when responding but has specific interest in their own portfolio in South Somerset, covering 8 properties. These properties would be directly affected by removing one pump from Yeovil and one from Martock. For example, Montacute House has a PDA of 5 pumps and an ALP which would usually be made up of Yeovil (3 pumps) and Martock (2 pumps). By removing an appliance from the two stations, two of the five PDA appliances would have to travel from further afield. In fact, it is said that removing a third appliance from Yeovil will directly affect the speed of response to Montacute House by delaying the fifth appliance by 9.21 minutes. The removal of the second appliance from Martock will further impact the response to Montacute house by delaying the third appliance by 9.18 minutes, the fourth appliance by 9.26 minutes and the fifth by 10.24 minutes.

The National Trust asks the FRS to reconsider the removal of third appliances in Yeovil and Martock as they are likely to impact the speed of response to six of the eight NT properties in South Somerset in the same way as described above. Although it is recognised that the proposals may not directly affect the impact on life within heritage buildings, it is possible that lives could be impacted indirectly.

Exmoor National Park

Moorland and summer fires

The National Park states that nearly all of Exmoor's heather and grass moors are designated Sites of Specific Scientific Interest and most are also Special Areas of Conservation – and that it has worked closely with landowners, grazers and the FRS to manage the moors and ensure moorland burning is done in the winter.

Large wildfires in the summer are a key concern, particularly for the safety of people on the moor. They can also impact habitats, wildlife, peatland soils, carbon stores and water quality. Increases in old heather, gorse, bracken and scrub are said to be caused by changes in farming and land

³ Understood from the FRS' graph in the consultation document showing the disparity between the demand for and availability of fire engines which demonstrates over-provision in many areas.

management as well as climate change. Areas of particular concern are named and the National Park states the importance of having the correct knowledge and equipment in place to tackle such fires.

The National Park also mentions the ‘good working relationships’ developed with local fire crews through managed burning activities. The National Park values the knowledge the crews have of the area and it seeks reassurance that the risk of summer fires has been considered by the FRS in the proposals that the appropriate skills, knowledge and equipment will remain in place.

The Exmoor road network

The National Park states that Exmoor has a sparse network of minor roads, meaning journey times can be significant and diversions “*long, narrow and steep*”. As the population increases in the summer, there are often traffic delays in Porlock, Dunster, Lynmouth and Dulverton. The National Park seeks assurances from the FRS that these longer travel times have been considered in its risk assessment.

Exmoor’s housing stock

The National Park states that Exmoor’s housing stock is not typical in that there is a high proportion of older houses, at times with difficult access. Thatched roofs are common and some houses are a great distance from fire hydrants. The National Park seeks assurance that the FRS has considered the nature of the housing stock in its response needs risk assessment.

The National Park, while recognising DSFRS’ financial pressures, states that all public bodies must have regard to National Park purposes. The FRS is invited to meet with the Chief Executive of the National Park in relation to this and for specific discussions on the challenges of managing moorland fires.

Dartmoor National Park and Dartmoor Commoners’ Council

Dartmoor National Park and the Dartmoor Commoners’ Council state that there are nearly 36,000 hectares of common land within the National Park (approx 37% of its total area) – and that much of the park contains Sites of Specific Scientific Interest and Special Areas of Conservation which “*must be managed in a particular way so as to avoid certain damaging operations*”. It states that wildfires are a key potential threat.

The National Park and Council feel that maintaining the network of fire stations around Dartmoor as well as the local knowledge of the crews is important in the context of wildfires. The Council is a partner in the Dartmoor Fire Plan along with DSFRS and the National Park Authority, which is said to have been “*invaluable*” in controlling wildfires. It states that the plan depends on crews knowing “*how best to access often difficult terrain*” and working with farmers - as well as having knowledge of rural properties and farmsteads.

Wildfires

The National Park and Council state that large parts of the Dartmoor moorland is designated a Special Area of Conservation. These landscapes are particularly vulnerable to wildfires, creating risk for habitats and species, a risk the submission states is likely to increase due to climate change.

Two large wildfires have happened on Dartmoor in the past two years and the FRS appointed a link officer to work with partners to ensure future response and mitigation. The National Park and Council

consider it important that crews responding to incidents of this nature know the terrain and have the relevant experience, and that the impact on resources is not made clear in the consultation paper.

Heritage at risk

The National Park and Council note that there are over 2,070 listed buildings within the National Park and asks for reassurance that changes to DSFRS' capacity would not impact negatively on its ability to respond to fires in historic assets.

Legal and other obligations

The National Park and Council state that under Section 11A of the National Parks and Access to the Countryside Act 1949, relevant authorities have a statutory duty to have regard for the purpose of the National Park when making decisions that may impact them. They feel the FRS is a relevant authority and does not feel it has attached "*appropriate weight*" to the risks the National Park has highlighted, which may put the "*special qualities*" of the National Park at risk.

The National Park states that through its Ranger Service, it has developed a "close working relationship" with the FRS where they jointly attend incidents. It is keen for this to continue.

Individual response (1)

The respondent states that when ACFO Bond visited Barnstaple to deliver information on the proposals, they were surprised to see no detail around future plans to improve the on-call system or the salary scheme at Barnstaple. It was originally believed that changes to on-call would be included within the consultation as many of the facts presented are based on 100% availability. They conclude that this has not been included as such changes would depend on the budget available after any service changes have been made.

The respondent discusses the salary or 'pay as you go' system and does not agree with the assertion that it does not work – at least at Barnstaple and South Molton. They do, though, admit the systems have not worked in other areas because "*with such a diverse workforce with 100's of variables from station to station a one size fits all approach is risky*".

It is also said that availability depends on how employers engage with the system. That is, if they are happy to release their workers, the 'pay as you go' system is effective. The respondent states that "*employers, station management teams, recruitment, retention, demographics and calls attended*' have a larger bearing on availability than the pay structure at a station".

The respondent is concerned that Barnstaple is being "*tarnished with the same brush where other salary systems have failed*". They have apparently "*made it work through strict management and encouragement despite operating at just 60% establishment levels for most of the year*".

They also state that Barnstaple's use of the salary scheme has meant it has not had the same freedom or entitlement as other stations to "*book everyone off on a Bank Holiday weekend and leave a crew of zero as the safety blanket of the ORC will employ four people on double time to cover at serious expense*". Moreover, there have apparently been many occasions where the station has provided

standby at the ORC's request to cover other stations because *"we are available assets that aren't off the run"*, while also having enough staff available to maintain the Barnstaple pump.

It is said that staff at Barnstaple had accepted employment on the basis of their salary system, including some partially-retired staff that rely on it as their main source of income. Disappointment is expressed that this might be lost, resulting in salary reductions - and about the lack of information on any potential impacts.

The respondent feels there is a risk of Barnstaple on-call firefighters seeing an increase in fire calls if Barnstaple WDS changes to day crewing, despite the potential reduction in salary - *"potentially more for less"*. Moreover, although an increase in calls is seen as a positive for an on-call station, it is a concern that the increase will mostly be at night when staff are asleep, *"at the detriment of their wellbeing"*. It is also considered a surprise that a proposal *"based on statistics and risk"* has led to a proposal to change Barnstaple's WDS appliance to daytime on-call only given *"it seems that they have actually attended more shouts during their evening shifts than the day ones"*.

Ultimately, the respondent says that *"we cannot maintain two pumps and two specials at Barnstaple of a night time as it currently stands. If we struggle to achieve a full establishment on the salary system then you can imagine the potential challenges ahead"*.

It is felt that the *"many contradictions"* included in the consultation document make it difficult to respond to - and the respondent says that the data used is being *"questioned left right and centre"*. Particular concerns are the use of data from fires and RTCs only, and incidents attended on station grounds.

The respondent agrees that prevention work is very important but does not feel the incidents they have attended recently could have been prevented by DSFRS intervention. They therefore cannot endorse an increase in prevention work at the expense of the current service.

The respondent supports some of the proposals - the removal of third pumps and the introduction of roving appliances for example. They also suggest other measures to improve on-call availability, such as:

Much like the bi-service PCSO's we employ, can another arrangement be created utilising council positions?

Do all positions at SHQ have to be worked from SHQ or can they be at an On-Call station equipped with an internet connection and telephone?

Why can't we pay employers to let their staff go?

Why can't we trial the WM of a station having his/her annual budget to run his/her station how he/she thinks it would best suit for availability?

Individual response (2)

The respondent feels that *"Devon and Somerset Fire and Rescue Service is in a mess. It is in need of serious overhaul, far wider reform and without public consultation"*. They also feel that DSFRS's media

department should *“put things right and spell out come home truths about what you do and why”*, particularly in relation to the cost of running fire engines and stations.

Station closures

The respondent approves the closure of Appledore, Ashburton, Budleigh Salterton, Colyton, Kingston, Porlock, Topsham and Woolacombe Fire Stations because they are low activity, very close to other stations and could be closed immediately without hindering operations in any way.

Removal of third fire engines

The third fire engines at Bridgwater, Taunton, Torquay and Yeovil are described as *“an asset not to be got rid of”*. Those at Bridgwater and Yeovil have apparently been recently used and all are *“in a position to support other stations in the area of responsibility”*.

Removal of second fire engines

The respondent assumes that the second fire engines at Crediton, Lynton, Martock and Totnes and never used and so accepts their removal.

Change of status to day or night crewing

The respondent believes that the Chief Fire Officer can and should make changes to ‘Operational Procedures’ such as this without public consent.

Roving fire engines

Questions are asked around the crewing levels, costs, accountability and location of a roving fire engine. The respondent is also concerned that the crew will be considered the ‘Nomad Squad’ or ‘Appliance without Portfolio’ and not taken as seriously as those on other appliances – and that *“the call and response times might be questionable to an incident thus making it difficult to assess the outcome of other crews and appliances”*. They suggest the adoption of a (BA) Crew Bus to convey firefighters from station to incident (as is currently used in Germany).

Other suggestions

The respondent also makes the following suggestions:

Combe Martin Fire Station could be considered for closure as it is well-supported by Ilfracombe Fire Station;

Hatherleigh Fire Station could be considered for closure as it is well-supported by Oakhampton, North Tawton, Holsworthy and Chumleigh Fire Stations;

Bampton Fire Station could be considered for closure as it is well-supported by Dulverton, Wiveiscombe and Tiverton Fire Stations;

Hinkley Point is 6.6 miles from Nether Stowey Fire Station and 11 miles from Bridgwater Fire Station, meaning *“as response times go, there is little in it”*. Cover is also available from Williton Fire Station – and if Bridgwater retains its three appliances *“then cover to Hinckley is no problem”*;

Castle Cary Fire Station is nominated for closure over Wincanton Fire Station due to its close proximity to the A303 and access routes for support from Yeovil;

As Glastonbury and Street Fire Stations are only 2.8 miles apart, the latter could be considered for closure given the former has better access and more space;

Mortenhamsstead Fire Station could be considered for closure as it is well-supported by Changford and Bovey Tracey Fire Stations;

Modbury Fire Station could be considered for closure as it is well-supported by Ivybridge and Plymstock Fire Stations; and

Yelverton Fire Station could be considered for closure as it is well-supported by Princetown and Bere Ashton Fire Stations.

Individual response (3)

Introduction

The respondent understands the rationale and reasons for proposing change and whilst uncomfortable, agrees with them. They feel the Service has done a very good job in presenting the case for change and supporting data to evidence the rationale.

Option 1: station closures

The respondent would prefer no closures but feels the risk-based information supports the proposal. They suggest that some stations (Appledore, Budleigh Salterton, Ashburton, Colyton, Porlock and Woolacombe) have the option for changing to volunteer rather than complete closure - or continuing to provide a co-responding or special response where the data and community support this, perhaps using existing community assets or partners.

Option 2: removal of third appliances

It is said that evidence supports removal or redeployment to roving pumps, but for the busiest two 3rd pumps with better availability (Taunton & Yeovil), the respondent would support further work to determine how they could be retained to better support response and resilience.

Option 3: removal of second appliances

It is said that evidence supports removal or redeployment to roving pumps, but for the busiest two 3rd pumps with better availability (Totnes & Martock), the respondent would support further work to determine how they could be retained to better support response and resilience - particularly given both stations' proximity to urban and large town risk areas where third pumps may be removed. This "could be on an on-call at night only or crewed voluntarily".

The respondent also says that the affected stations could be a base for four of the six roving pumps and allow for night crewing where this option is viable. If this is not an option, DSFRS could consider relocating a special appliance to each of these 4 stations where risk suggests (i.e. Wildfire for Lynton, Water Carrier or Incident Support Unit at Martock, ICU at Totnes, Welfare Pod at Crediton).

Option 4: change of status to day crewing

All three stations were previously day crewed so the respondent feels the risk data supports this proposal. However for Barnstaple, given changes to Ilfracombe in 2013, they suggest either moving the station to balance risk or maintaining WDS crewing given the location in North Devon and surrounding resilience. Another option could be switching between 24/7 and day crewing similar to the Newquay (Cornwall FRS) model for any seasonal risks.

Option 5: on-call at night only

The respondent supports this proposal but suggests that where crewing allows these appliances to be available during the day, they can do so on a voluntary basis. They also suggest that one station in each Operational Response Group consider these stations as a base for each of the six roving pumps, which can then be used for night crewing where this option is viable (but would prefer each of the four stations where a P2 is proposed to be removed is considered for this first).

Option 6: introduction of day crewed roving appliances

The respondent completely supports the use of roving appliances but suggests locating them at the four stations where P2s are being removed - or one in each of the Operational Response Groups and allow them to be part of the proposal in Option 5 as Night Call only.

Other considerations

Timing of implementation

The respondent recommends that DSFRA pause any implementation process following public consultation until the impacts of ongoing processes (such as the current HMICFRS inspection, Grenfell Inquiry and FRS ways of working are known. They also suggest the FRA, councillors and MPs continue to press the Fire Minister/Central Government for improved funding for DSFRS.

Fire Authority

The respondent suggests re-examining the FRA constitution to ensure effectiveness, efficiency and need.

Flexi duty officer numbers

Currently there are nine Groups of seven FDOs: the respondent suggests rationalising to nine groups of six to make financial savings. The actual posts would be *“retained on day duty and still provide operational response with resilience where needed to cover FDS Rota”*. They also suggest: exploring the effective use of DWFRS FDOs who regularly provide operational response into DSFRS and vice versa (as this often provides an over-provision of FDOs) and consider aligning the FDO Rota to that of DWFRS (4 week rota) to improve efficiency and productivity.

NFSP response plans

The respondent comments on what they see as DSFRS's over-resourcing of incidents and the need to provide a more 'Resource to Risk' based appropriate response. This, they feel, would provide savings by reducing mobilisations, reducing road risk and improving delivery of protection activities.

It is said that previous to NFSP, if a specific piece of equipment was required it would be sent in a suitable ancillary vehicle. With NFSP, it has to be sent with the appliance and entire crew, denuding emergency cover. Reverting to the use of ancillary vehicles would *“make more effective use of response people attributes”*.

Collaboration

It is suggested that DSFRS conduct a cost analysis of RCT attendance to determine if this work could be picked up by other agencies or by a more cost effective attendance (i.e. crews of less than 4).

Station 60

The respondent says that as station 60 is low activity, closure and reassignment of roles (and reducing the overall DSFRS establishment by reducing FTCs elsewhere) would make a large saving.

Fire Control

The respondent says that combining the DSFRS Control Room and *“sharing the function through the NFSP with DWFRS & HFRS Control Functions”* would provide a significant revenue saving.

Estates

A detailed feasibility study is suggested in terms of selling or renting out parts of the estate that will no longer be required if certain proposals are ratified. This, it is felt, could generate significant income in conjunction with DSFRS continuing to share accommodation with partners and work more flexibly with improved technology.

General comments

The respondent objects to those who have the loudest voices (including the Unions and ex-DSFRS staff) purporting to speak for all - and says that *“those who have most to say in opposition appear to offer nothing in return to face the challenges of a modern FRS”*. They also note the *“unfounded, negative, inappropriate and personal comments”* on social media that provide *“unclear and inaccurate information to communities who are not aware of challenges on DSFRS”*.

The respondent tells FRA members that while they are here to hold DSFRS to account, they cannot *“pick and choose”* their message to boost their popularity. They urge them *“to be honest and accountable for the service you expect and allow based on funding and the direction you set of our senior leaders and not distort the facts”*.

Individual response (4)

The ‘Safer Together’ programme and the consultation process

The respondent says the ‘Safer Together’ proposals were, according to the Pre-consultation Community Impact Assessment (PCIA), put to a wide variety of stakeholders, focus groups and communities. However, they feel this was not at all widespread and did not seem to include any community involvement. This, they feel, is not in accordance with the Government’s Consultation Principles, which requires that all affected groups are able to input into the proposal **before** consultation and that the options put forward are real options and not a ‘fait accompli’ – for while it

is true that the inclusion of option 7 gives a freehand alternative, there is really no option other than to agree or disagree with one or all of the fixed options, in whole or in part.

Moreover, the respondent notes that while there is reference to feedback in the PCIA that says the options then proposed did not meet the hurdle criteria set, these were modified to achieve the current options. Without information of the trail of these changes, these *“do not really help the understanding of, or the rationale for the...final 6 options”*. In addition, under the Equality Risk Benefit Analysis there are *“significant concerns that age and disability needs have not been fully recognised”*.

National situation

The respondent questions the national statistics quoted in the consultation document that are used to underpin the need for change. For example, the 33% reduction in fire incidents in the last 10 years is considered incorrect in light of the 9.2% increase in 2018/19 (meaning the cumulative 10 year figure is a reduction of 24%) – and *“looking at the 5 year trend, the number of incidents has actually increased in that period by some 6.5%”*.

More locally, the reduction is said to have been less than the national average at 21% over the 10 year period – and the figures quoted in the document for 2018/19 show an increase of some 12.5%.

While acknowledging that prevention methods have driven improvements over the past ten years, the respondent feels these initiatives are *“subject to a law of diminishing returns”* (especially given that the 2015 figures show at least 93% of households have a smoke alarm). They feel that any increase in expenditure on prevention will have a *“less and lesser effect to the point that...it will plateau”*.

Finally, it is said that the Association of British Insurers (ABI) has apparently noted an increase in the total cost of fires by as much as 100% - partly due to increases in response times.

Local changes: the proposals

The respondent accepts that the proposal to close the eight stations listed is down to low use, but does not accept that this is the same as low risk. They also say, in the context of fewer resources and longer response times, that *“a low risk fire with no means of extinguishing is still low risk, but the outcomes can be catastrophic if it is not dealt with in time or properly”*.

Of the eight planned closures, all stations except Porlock have a station less than 6 miles away. Moreover, the respondent notes that with the exception of Woolacombe, all the other stations will have a less than 15-minute response time after the changes. They are also concerned that the distances quoted are to existing fire stations whereas incidents will likely be in surrounding villages, adding several minutes to the journey.

The respondent suggests that whilst a 16-minute response to Porlock may be possible from Minehead, it is the minimum and takes no account of traffic conditions and onward journeys – and that the quoted times from Lynton are *“not realistic”* due to obstacles such as Lynton Hill, Countisbury Hill and Porlock Hill. The *“best estimate response from Lynton is around 30 minutes”*.

Furthermore, it is said that while most of the other stations have considerable overlap in areas with neighbouring stations, Woolacombe is slightly outside this overlap and Porlock’s zone is considerably

wider. Indeed, *“the linear nature of the two adjoining stations to Porlock means that the Porlock zone is very much less well covered than all of the other stations in Option 1”*.

Response times

The respondent is very concerned that if the closure of Porlock goes ahead, DSFRS’s 10-minute response standard is *“set to fail, and fail significantly”* in the area - meaning significant property damage and possible loss of life.

Risk assessments

The respondent does not consider the Mosaic models (which are based on consumer habits and attributes designed for economic marketing purposes) to be suitable for the segmentation of ‘consumers’ for the use of a fire service.

In Porlock, 41% of the population is over 65 years and 7% is over 85 years; by 2029, on current trends, this will have risen to 60% and 16%. These are *“well above both the figures used in any DSFRS analysis and the general national and local figures”*. According to national statistics, 48% of dwelling fires involve elderly over 65 so the respondent feels it is wrong to say, according to the Mosaic data, that just 4.35% of the households affected by the closures in Option 1 are high impact - particularly in Porlock. One explanation offered is that the Mosaic data *“lumps all of the closures in Option 1 into one model, but in fact, the other locations may have very different profiles to that of Porlock”* and that *“if this is the case, then no inference about the risk and safety of any individual location should be inferred from the collective data”*.

The respondent then speaks of the model for the collective eight stations, which states that without a local fire station the average life risk caused by a dwelling fire is improved by 2.34%. This is because, currently, at any one point, 50% of the time the service is operating at a higher risk as half of its appliances are not available at all times. The respondent suggests that *“DSFRS would be well-advised to scrap the whole of its ‘Safer Together’ programme, or at least the bulk of it, and concentrate on improving its own woeful inefficiency”*.

As for the reduced risk for Porlock, the respondent states that as its asset effectiveness is currently very high (as is those of its supporting stations), there will *“likely be a worsening of the Life Risk change by some 0.66%”*.

Conclusion

In conclusion, the respondent feels *“it is impossible to agree with the overall intention that going with any option will make for a ‘Safer Together’ tomorrow”!*

With specific regard to the options, the respondent says that:

Option 1: this does seem to have some merits for saving costs as some stations have very poor availability and others are just a few miles from other stations. Two stations (Woolacombe and Porlock) would, though, see a significant increase in risk from closure.

Option 2: given the unavailability of the engines, and if they are not needed or available, they serve no purpose and funds could be better used elsewhere;

Option 3: the removal of the Lynton 2nd engine might be feasible if Porlock remains open. The other three locations need to have proper risk profiles for each site and concentrate on future needs with significant rising populations in the area;

Option 4: this has incremental savings of £1.9m and *“needs to be fully investigated as part of a self-contained package”* as it was *“quite wrong to put such savings in with the relatively small savings from closing the small stations”*. That said, the reduction of the second 24-hour night cover at various stations does not seem unreasonable;

Options 4 and 5: need to have better risk profiling than that given already as *“this is where the incremental big savings are and more work needs to be done on it”*; and

Option 6: there are no roving vehicles elsewhere in the UK, and the concept has been abandoned by one FRS which *“does not bode well for this type of operation”*. Moreover, there is no capital cost associated with this option – in fact, *“unlikely”* capital savings of £5.7m are shown (so while the text refers to new capital investment, the figures do not).

Overall, the respondent strongly suggests that Porlock should remain open due to: the area’s ageing population and access difficulties; the station’s important role in Exmoor and Porlock Hill RTCs; its corresponding role; and its close working with the Exmoor National Park and the National Trust. It is also said that the parish of Porlock (and its neighbouring parishes) contribute well in excess of the £50k revenue and capital costs expended on running the Porlock Fire Station to the Fire Authority each year.

Individual response (5)

Increased risk

The respondent states that:

The proposals will leave the population of the Seaton and Colyton division, among others, facing increased life risk;

The consultation document refers mainly to new town developments, presents no general analysis of population changes, and proposes to close stations in areas like Colyton where population is undergoing sustained growth and there is repeated, ongoing development. In addition, the proposals will cut stations in areas with above-average proportions of vulnerable elderly people like Colyton;

The plans are increasing the risks in rural areas like Colyton because *“local firefighters know their way around and can be the difference between life and death, or at least between saving a property and seeing it burn down”*;

The plans, although emphasising that alternative first engines will cover the areas with threatened stations, do not recognise that second engines are being removed in some of those areas: *“without the Colyton engine, no second engine will be able to reach a building fire in Seaton within the required time of 13 minutes”*;

Colyton station is close to the “*dangerous*” A35 and the submission changes proposed will go against the aim of not closing stations significant for RTA concentrations;

The proposals focus entirely on lives, without analysing the implications of changes to property and risk to property damage costs; and

DSFRS has not adequately considered the potential implications of climate change on flooding or the heritage of stations: “*you are proposing to destroy community assets and expertise which have been created over decades, even centuries*”.

The respondent also expresses concern for station crews – and feels that despite a recognition in the consultation document that it is not possible to recruit and retain enough on-call firefighters, the FRS website has not stated a need for new firefighters since before 2019. This, they feel, is a deliberate attempt to ensure no new recruits came forward in the areas where stations are proposed for closure.

Superficial treatment of prevention

The respondent says the consultation document refers to a reduction in fire deaths over time but fails to address a “*recent sharp rise in deaths*” in Devon. No evidence is provided to show how the FRS’ work has contributed to the changing patterns in fire deaths, so the respondent suggests that reductions are due to external factors (technology and habits) as opposed to anything it has done.

The respondent feels that the risk modelling is based on misleading assumptions. It compares the future (assuming all the Services engines are available) with now (assuming several are not available), whereas it should be comparing current theoretical full availability with future theoretical full availability. It is claimed that “*analysis has shown there would be an increase in fire deaths under those circumstances*”.

It is stated that no real proposals are given for increased prevention work, only a “*vague aspiration*”. The respondent suggests that the FRA has stated that additional smoke alarms could be provided if stations closed, but feels this could happen without closures and that discussions around prevention are a “*smokescreen*” for the FRA’s financial objectives. It is also said that the plans “*ignore the potential role of retained firefighters in prevention work*” and that “*stations could effectively become community safety centres*”.

Financial aims

The respondent states that the consultation document does not adequately set out the financial situation. They feel there should be more clarity around how much saving is needed and how much is being reallocated because “*hiding financial reasons behind pretended improvements to service risks your consultation being struck down as unlawful*”.

It is said the largest savings will come from selling the closed stations and the respondent feels that the projected improvements presented on risk to life are flawed, and that station closures are simply “*asset sales packaged as something else*”.

A flawed consultation

The questionnaire is described as “*overcomplicated and biased*” and in particular does not offer options to state concerns about specific stations and communities. Moreover, it is said that the

consultation has not been subject to “*detailed public scrutiny*” by Devon and Somerset Local Authorities (DSFRS apparently declined an invite to a Devon County Council scrutiny meeting as it was four days after the consultation closed). The responses given when the Service attended a masterclass for county councillors were not deemed adequate.

The respondent also states that the Chief Fire Officer stated they were only obliged to consult with the public (not Local Authorities), which was “*misleading*” as the Fire and Rescue National Framework for England says Services must engage with their partners, a requirement within the CCA and CDA: “*not consulting is not co-operating*”.

Individual response (6)

The respondent shared their opinion on the options presented by the FRS, as well as a spreadsheet of their own analysis of the capital and revenue savings presented in the consultation document.

The respondent assumes the revenue savings are based on salary and maintenance costs and feels the ongoing value for the future should be calculated to make them more accurate. Therefore, they have applied a multiplier of 10 to calculate the true overall economic value of the reductions. This total has been added to the one-off capital savings to create an estimate.

Ultimately, the respondent says that option 4 yields the greatest potential saving (£19.1 million) by changing to day crewing at Barnstaple, Teignmouth and Exmouth Stations – and that Option 5 (changing to on-call at night for second fire engines) will save an extra £3.4 million. They therefore believe the FRS should initially focus on switching from full-time to retained crewing, then focus on optimising the ownership and deployment of fire engines (for example removing all third engines and some second engines). The last resort should be closing any stations in their view. They also feel that introducing roving fire engines (option 6) is a ‘backward step’ that would introduce additional costs.

As the resident is based in Topsham, their main concern is the closure of this station. The proposal, which also includes moving one of its engines and retained crew to Middlemoor, is concerning as they are under the impression that “*few retained crew live near Middlemoor*” (as it is a full-time crewed station), meaning the Topsham retained crew would be in demand there. It would, though, be difficult for them to reach Middlemoor station in the ‘four minutes’ required and if new crew needed to be trained, this would take time and money, which the resident does not believe the FRS has considered.

The respondent argues that although Topsham station is only said to have around 20 calls a year, this is misleading as the crew is often called out to support teams outside their area. They say the station had 218 shouts in 2018 and this is set to increase in 2019 - and so they feel it would be more appropriate to reduce Topsham to one engine and use the station’s prominent location in the town for community preventative events.

The respondent is ‘surprised’ that DSFRS has not used the standard discounted cash flow approach to analyse the costs and benefits of the options presented. They are also “*puzzled*” by the way in which the six options were presented as there is no option that does not assume the closure of stations. This has led them to believe that DSFRS has already made up its mind on the closure element and that the other ‘added’ options are secondary ideas. They feel that by turning this on its head and prioritising the removal of redundant engines and moving to more on-call crewing, there is greater scope for cost

savings than simply closing stations: *“station closures should only be considered after these first two options have been thoroughly worked through, and only then when they do not adversely impact the recruitment and retention of retained crews”*.

The respondent also states that if a decision has already been made to close Topsham, it would be better to transfer one of the engines to SHQ where there are already facilities to house it, rather than Middlemoor. Topsham retained crews should be able to get there in the required timeframe also and it is in a good geographic area to cover the Exmouth area.

Individual response (7)

Initial observations on the proposals

The respondent feels there has been either no forward planning or that *“two parts of the organisation are not talking to each other”*. For example, the launch of the new Rapid Intervention Vehicles (RIVs) highlighted how the one at Porlock would improve response times in that area, *“then almost immediately announced that it is proposed to close Porlock...”*

Crewing

The respondent says that already, at any time of day or night, multiple appliances across the service are unavailable and that *“any further reduction in appliances can only aggravate the problem”*.

They also note that the vast majority of appliances are crewed by on-call (also known as retained) crews firefighters and that the ‘fragility’ of the system means there are long periods when there is *“insufficient crew to mobilise an appliance”*. It is said to be often only the crew making themselves available for far more than their contracted hours that keeps the service viable and that *“anything which might cause loss of goodwill could collapse the service completely”*.

Proposed station closures or reduction in appliances

The respondent makes the following comments on the proposals for particular stations:

Kingston: this station serves a very small, isolated village, and although it can rarely raise the full 12 complement, it is available for longer than some second and third appliances at other stations. It is also used to back up other appliances from the surrounding stations and is very cost-effective to run, so *“closing it does not make sense”*.

Ashburton: to the north is one of the major routes onto Dartmoor where large wildfires are common, and Ashburton has a Medium Response Pump (MRP) with larger water to deal with these; to the south it is a useful backup to the Torbay area; it is situated very close to the A38 and the Harcombe Bends; and would be the only appliance available for basic firefighting in the event of a *“major incident [calling] for most of the special purpose vehicles in the area”*.

Porlock: this is a very isolated, inaccessible location and withdrawing its appliance will leave the area unprotected. The station also runs a co-responder vehicle plus a small off-road vehicle for fighting moorland fires – and *“if this vehicle has to be transferred to another station will it reduce their ability to respond to normal incidents?”*

Exe Estuary Stations (Middlemoor, Topsham, Exmouth and Budleigh Salterton):

Exeter only has two Wholetime crews (at Danes Castle and Middlemoor). An on call crew at Danes Castle provide an additional appliance but are also responsible for an Aerial Platform and a Water Carrier – and jump crewing these can put the pumping appliance off the run. Middlemoor jump crew the Heavy Rescue Tender (HRT) which covers the whole Western plus much of Central Regions. This can mean that the pumping appliance is off the run.

In terms of introducing an on-call crew to Middlemoor, recruiting 12 or more people in one go is not easy and training of on-call firefighters takes time. Moreover, the proposal to transfer an appliance from Topsham to Middlemoor is unlikely to make the formation of a new crew much easier as most present Topsham firefighters will not be within the Middlemoor catchment area.

Keeping Topsham open delays getting the getting a relief crew to Middlemoor by around 10 minutes. If the requirement is to crew the HRT, this delay is less important as it is sent in support of other units. It could be considered that if the HRT can be despatched crewed by two people, Topsham's small vehicle could be used to get crew to Middlemoor without taking up a full appliance crew, *"such that at least one appliance is likely to remain available"*.

The wholetime crew at Exmouth provides the service-wide water rescue facility, meaning they are often away from the area. The proposal to reduce Exmouth to day crewed could mean that, assuming it retains water rescue responsibility and enough on-call crew are suitably trained to respond, availability to crew the second appliance could be low.

Budleigh Salterton is another station where DSFRS management decided that expenditure on a brand new RIV was justified to improve response times, so *"proposing to shut it seems totally illogical"*. Also, if the proposal to close Topsham and risk reduced availability at Exmouth were to go ahead closing this as well could leave the area vulnerable.

Torbay:

Removing the third appliance from stations such as Torquay will not immediately affect availability to any great extent, but will have the effect of *"reducing the on-call complement for that station"*. This would have a *"knock on effect on the availability of specialist appliances such as the aerial platform and Water Carrier"*.

If Torquay is reduced to two appliances, the need to crew the aerial platform could mean only one appliance is available for a major incident. If Paignton becomes day crewed, the second appliance is likely to become less available meaning major areas may only be covered by two appliances. If Totnes has an appliance removed, availability from may be reduced too.

The respondent has further concerns about the proposals to day crew other wholetime stations, notably that fire-related fatalities tend to be during the night when people are in bed. Moreover, they say that additional on-call crew would need to be recruited, and that if any stations have special responsibilities then *"enough on-call crew will need to be trained and certified to these standards"*.

Provision of appliances to stations

The respondent says that *"despite the experiments being unpopular with many frontline firefighters"*, DSFRS has introduced smaller appliances instead of full size ones to reduce cost and *"allow them to*

pass through smaller lanes or roads blocked by parked cars". These 'experiments' are described as "unsuccessful" and the respondent questions "how many more special purpose vehicles are going to be needed, in particular water carriers and rescue tenders...to cover for the reduced capability of LRPs and RIVs, how many extra crew mobilisations are going to be needed every year to get these vehicles to incidents and has any calculation been made as to how this will reduce the number of frontline appliances available because at least part of the crew is on the special purpose vehicle?"

Fire Boat

The respondent says that the "very expensive and high maintenance" Fire Boat at Plymstock "may be a good status symbol but in these days of austerity can it really be justified".

Officer provision cars

The respondent questions the need for 50 4x4 cars for officer provision, and whether more economic vehicles could be sourced.

Fire Prevention

The respondent, whilst agreeing that education and prevention work has contributed to the reductions in fires in recent years, says these reductions have been influenced to a far greater extent by national and international legislation. They generally find it difficult to see how diverting resources from firefighting to fire prevention can realistically bring down the rate of fires to any great extent - and feel the 'rescue' element of the service must not be forgotten: "with environmental risks associated with Global Warming it seems likely that wind or rain related incidents will increase and no amount of publicity or education is likely to bring about a reduction in this". As such, they do not wish to see a reduction in response resources for reinvestment into prevention.

Head office policies

The respondent is concerned that "there is a move to concentrate resources in the administration departments at the expense of frontline services" and that money is being wasted on things such as "a £650,000 software system to look after the training records [that has] been scrapped as not fit for purpose". This, they feel, must be more closely scrutinised.

What makes an on-call firefighter?

The respondent questions why most on-call stations have vacancies and suggests that if sufficient priority could be given to improving morale, DSFRS "could be highly respected throughout the country".

They also feel DSFRS must take care not to:

- Leave on-call firefighters out of pocket;
- Overload on-call firefighters (and their primary employers) with more callouts; and
- Lower morale through station closures and/or removing appliances.

Individual response (8)⁴

A lack of detailed information

The respondent says the proposed changes to DSFRS are a “*thinly disguised endeavour to misrepresent the fact that [DSFRS] is proposing cuts for the reasons detailed in the FRS Efficiency Plan - that will reduce safety, cost lives, damage property...damaging Industry and costing jobs*”.

They accuse senior officers and other staff of providing “*inaccurate, misleading and evasive answers to questions*” - for example by claiming that the number of fires and incidents have reduced drastically since 1948 when they have “*significantly increased*”. They also say there never has been a connection between number of calls and the resources required: “*Fewer fires does not directly equal fewer firefighters. We provide a service dependent upon risk, not demand*” (National Fire Chiefs Council).

The respondent describes the assertion that prevention work has cut the number of fires and fire deaths and that more prevention work will save more lives as “*wishful thinking*” because “*there is no direct evidence that prevention works*”. The main reasons for the reductions are changes in clothing and furniture regulations, safer forms of cooking and heating, and the big decrease in smoking.

The respondent says people are frequently told that DSFRS is 'reallocating resources' and 'will do more prevention', but have not given any detail about how the money will be spent, “*which makes it impossible to judge the value of each option*” and “*means, if the cuts go ahead, that we won't know if the claimed prevention improvements were actually implemented*”.

Inaccurate answers about statutory duties

DSFRS has apparently said ‘we only have two statutory duties - to attend fires and to attend RTCs’ - forgetting that prevention is a statutory duty, that regulations made under the Fire & Rescue Services Act extended its duties to include a number of other non-fire emergencies and that there is a statutory duty in relation to all emergencies that threaten human welfare and the environment under the Civil Contingencies Act.

The respondent also suggests it is disingenuous to suggest DSFRS is not funded for other emergencies as “*core funding from government and council tax payers is for providing a fire & rescue service and has nothing to do with specific types of emergency*”. It also receives additional specific funding from government for specialist rescue work and from the ambulance service for co-responding.

Modelling the effect of cuts

The respondent disputes the claim that if all fire appliances had a wholetime crew it would barely save any extra lives. They also highlight modelling that “*shows the effects of removing a second fire engine from an on-call fire station indicated an extra 11 deaths in 100 years. Yet for a similar station, in terms of number of calls and the area's population, DSFRS claim just 1 extra death in 1,000 years!*”

⁴ This was submitted via email, but is the only submission sent via this medium that required a summary so has been included here with the other detailed responses.

This, they feel, reinforces concerns that DSFRS has manipulated the modelling data to make the cuts appear less harmful, and confirms that *“they do have station level data”* even though it denied this in response to a Freedom of Information request.

The respondent also comments that:

DSFRS demonstrates a “worrying failure” to understand risk in repeatedly misusing the term risk talking about the frequency of calls;

There were over 900 fires in people's homes in Devon & Somerset last year and at 72 of them people had to be rescued;

Many comments made by DSFRS (around reserves, day cover, response times and the proposals themselves) have been *“misleading”*;

They were told that the ‘majority of fatalities are people who can’t escape by themselves’ and ‘vulnerable people’ and so by increasing response times and *“making changes you know will impact more seriously on vulnerable groups”* DSFRS is in breach of the Equality Act;

They were told that ‘if it was just about money’ DSFRS ‘could have made much bigger savings in a different way’ which raises two points: if they had other ways to save money, why is the public being denied the opportunity to comment on those options?; and a law firm advises that, if there is a need to make savings, the financial position must be clearly set out – and if it is not, hiding financial reasons ‘behind other, more palatable, reasons to change a service risks your consultation being struck down as unlawful’.

Ultimately, the consultation is described as *“riddled with inaccurate, contradicting and misleading information, false claims and a lack of detail”*.

Individual response (9)⁵

The respondent is concerned that the consultation documentation only mentions the case for residential premises and RTCs, and not for any type of business or hospital (of which there are many in Somerset) etc. has been included. They also say that *“no convincing reason is...provided for allowing the majority of fire stations and appliances to be unable to turn out on at least a 95% success rate”*.

The proposal to close Porlock Fire Station is criticised as it is *“one of the better stations to be able to respond to a fire 85.4% of the time”* and because it *“is an important asset to provide a 3rd appliance cover to Minehead Community Hospital”*.

The respondent says that the closure of Porlock and the lack of availability of other appliances within the area is of *“major concern considering the guidance given for the ‘Fire Safety in the Design of Healthcare Premises’...the recognised standard as it is expected the fire and rescue service can be relied upon to attend and extinguish all fires”*. They worry that response delays will increase the chance of

⁵This was submitted via the questionnaire, but is the one of only two submissions sent via this medium that required a summary so has been included here with the other detailed responses.

fire spread, causing *“a considerable amount of damage to an extent that wards and other areas could be rendered uninhabitable for a considerable time”*.

This proposal to remove the third appliances from Bridgwater, Taunton, and Yeovil could also, it is felt, have a serious impact on local hospitals and mental health inpatient wards - especially with an extended travel time for supporting appliances to attend. The respondent says that *“a loss of any site would put extreme pressure on the system however a loss at any acute mental health ward could be very difficult to manage”*.

The respondent supports the proposed roving fire engines as *“a good substitute for the lack of existing cover”* that *“may reduce the fears of the existing cover provided”*. They recommend that *“no reduction in existing cover is implemented but instead the additional resources are considered”*.

Overall, the respondent *“views with great concern the pitiful savings these options will provide in relation to the damage that all businesses as well as the NHS could suffer...due to the delays that will be encountered”*.

Individual response (10)

The respondent feels the consultation plan *“is based on incomplete data, inadequate analysis and draws unreliable conclusions”*.

The following points form a *“critical analysis”* of the planned changes:

There is no analysis of how many appliances are required - the respondent would expect a series of scenarios to be outlined, including civil contingencies, military asset use, resources available from neighbouring forces and a description of how they will be integrated;

The location of fire stations is based on current footprints as opposed to determining the best theoretical locations;

There is no analysis of how assets could be incapacitated by terrorism or hostile power action (either in an exclusion zone or due to damage);

The analysis is based on average response times, which disguises the potential impacts of traffic congestion;

Although mentioned, there is no description of how future population growth has been incorporated into the plan;

The plan focuses on the 75% of operational frontline staff, without reviewing the 25% of support staff;

The plan does not describe how skilled labour is incorporated - nor does it address diversity, the cost of staff turnover in each station and how volunteering could be embraced;

The plan considers the current cost of property, but does not consider the cost of existing property and whether the savings envisaged are *“realisable and fictional”*;

The fact that all proposals envisage the closure of eight stations means it is *“questionable”* as to whether the process follows the correct guidelines for public consultation;

No strategy is provided for IT and how emerging technologies could be utilised, raising the question as to how ‘future proof’ the strategy is;

There is no enumeration of external benchmarks or best practice that could be used to determine the efficiency of the proposals; and

When describing the risk modelling tool used, it is said the description of inputs is either “*very summarised or deficient*”. It is not therefore seen as a reliable tool.

In terms of specific areas, the respondent refers to the planned closure of Topsham Fire Station, which is considered to be in a good location to provide contingency to Middlemoor and Danes Castle. It is also said to be a lower cost site to run, which would be difficult and costly to dispose of as it is within a conservation area. It is also on high ground and gives good access to alternative roads when main highways are shut.

The respondent says that Topsham Fire Station is close to the airport, the main section of the population exposed to flood risk, a significant military facility and the regional centre for government. They also feel that Exeter is the main civilian target for terrorism in the South West, and that the station covers this area. The fact that the figure of £400k is given for closing eight station leads the respondent to believe that an average saving of £50k for closing Topsham is not worth the increased risk to the area.

The respondent refers to the fact that DSFRS covers different police and ambulance service areas and considers it “odd” that work with Devon and Cornwall Police is referred to but that with Somerset and Avon is not. It is said that “*the consultation process should be extended to consider a much wider strategic change enabling more resources to be deployed at an operational and local level*”.

The respondent states that DSFRS cites “*significant*” expenditure on leased cars and “*gym quality*” treadmills on its website, and questions why these are necessary. They also state that the level of outsourcing is high and express interest in understanding the impact of the changes on head office costs. They state that “*before frontline operational staff are removed, the general public should reasonably expect that the head office has been pruned to a minimum*”.

The respondent also refers to the claim that pensions will lead to a large increase in costs when the 30% actual becomes a direct charge. They assume that pension costs are lower for on-call staff than full-time and therefore feel it makes more sense to work towards a more on-call structure.

Individual response (11)

The respondent states that there are different understandings of the term ‘risk’ and does not believe that closing a station removes risk in terms of probability or consequence and does not either provide an adequate answer to issues around the availability of staff or equipment. They essentially say that “*it would be unwise to assume that the probability of an occurrence not arising based on geographical/historical behaviour patterns remains the same or reduces without knowing more about the population in different areas and their individual risk profiles*”.

The respondent believes DSFRS is assuming human behaviour patterns will remain the same or improve, but feels the service cannot control what people do. As such, it should not predict probability

based on changes in life to too great a degree as *“we live in an uncertain world”*. They state that staffing levels should not be reduced without other physical measures such as adequate fire detectors being sufficiently in place, particularly in domestic dwellings.

Although firefighting equipment has improved over the last few decades, domestic property is not said to have been upgraded at the same pace. Distance and response times are therefore said to be crucial, and the respondent argues that closing stations will worsen the latter.

The respondent states that building new housing estates further increases the demand on the FRS but that the fact these are generally built to modern construction standards can *“affect or distort”* overall statistics and should not provide justification for reducing cover in existing residential areas.

The respondent suggests that taxes may have to rise to meet demand and to provide the level of cover *“proven to be reasonable in the past”*. They question why there is no ‘option 8’ to retain existing coverage and resource it adequately. As all options refer to the closure of stations, it is not felt enough acknowledgement is given to the compounding effect of removing further pumps in nearby stations and the impact on coverage.

The respondent complains about the consultation document’s assertion that appliances are often unavailable without defining availability: it is not clear whether this is due to manpower or equipment failure/breakdown, two different problems to address. They also feel that issues around staffing levels should be remedied by determining what is required to retain the existing level of cover – followed by deliberation around how to fund this.

It is felt that in a ‘mix and match’ option, it would not be fair to choose to close just one station for example: *“that is like rewarding the guilty and punishing the innocent”*.

In the case of Ashburton, the respondent states that no reference is made to its population or that of surrounding neighbourhoods - and that the proposals talk of Changford Fire Station where the intention is to retain the service, despite the population being significantly smaller. It is estimated that if the Changford crew were to attend an incident in Ashburton, it may take 30 minutes or more.

The respondent also expresses concern about a lack of resilience in the event of a major emergency and states that *“retaining smaller facilities would continue to provide areas exposed to such risk with protection in such times when back filling occurs”*.

4. Petitions and Standardised Submissions

Overview of petitions received

- 4.1 Various petitions were organised during the consultation and this chapter reviews all those of which DSFRS and ORS is aware. The total number of signatures, across all five petitions, is **43,644**.

Fire Brigades Union petition (30,294 signatures)

- 4.2 The largest petition, organised by the Fire Brigades Union (FBU) and entitled ‘Don’t cut fire services in Devon and Somerset’, attracted **30,294** signatures. The petition statement was as follows:

Scrap plans to cut fire services in Devon and Somerset.

These proposals are an attack on the emergency front line service in Devon and Somerset that will put both the public and firefighter lives at risk.

Why is this important?

Devon and Somerset Fire Authority are currently consulting on the biggest cut proposals in living memory.

These cuts propose to:

- *Close 8 fire stations in Appledore, Ashburton, Budleigh Salterton, Colyton, Kingston, Porlock, Topsham, and Woolacombe*
- *Cut night cover at fire stations in Barnstaple, Exmouth, and Paignton*
- *Cut the second fire engine at Crediton, Lynton, Martock, Totnes fire stations*
- *Cut the third fire engine from Bridgwater, Taunton, Torquay, Yeovil fire stations*
- *Cut the day cover for the 2nd fire engine at 14 stations in Brixham, Chard, Dartmouth, Frome, Honiton, Ilfracombe, Okehampton, Sidmouth, Tavistock, Teignmouth, Tiverton, Wells, Wellington, and Williton.*

Devon and Somerset Fire and Rescue Service (DSFRS) senior management are proposing to introduce 6 roving day crewed engines for targeted response, alongside prevention work which they believe will make communities and visitors to Devon and Somerset safer. How can DSFRS management expect the public to respond to a concept which contains not detail? This is an outrage and total mismanagement by DSFRS.

To stop these disastrous cuts, please respond to the consultation and tell DSFRS that we will not accept any deterioration of fire cover in Devon and Somerset.

<https://www.dsfire.gov.uk/SaferTogether/ServiceDeliveryConsultation/TakePartInTheConsultation.cfm>

We are not prepared to compromise on public and firefighter safety and call on Devon and Somerset Fire Authority to reject these dangerous proposals.

Devon and Somerset residents, visitors and firefighters deserve better.

- 4.3 The hard copy version also included the following:

We, the undersigned, are against all seven options that form Devon and Somerset Fire Authority's public consultation entitled "safer together". All of these options will put FireFighter and Public LIVES AT RISK. We call on Fire Authority members to reject all of these proposals.

All respondents to this have provided Name, Address, Email and Signature.

Two petitions relating to Colyton Fire Station (7,475 signatures)

- 4.4 A petition to 'Save Colyton Fire Station' was signed by **7,385** people - 1,384 online and 6,001 on paper. The online petition statement was as follows:

Due to shifts in the population of Devon and Somerset, a change to our emergency services is being proposed.

One of the options to tackle this is to close Colyton Fire Station.

As a community, we cannot let this happen. On these rural roads, sparse fire stations and not to mention recent callouts for the need to have this station, this must not go ahead.

There must be a way around closing down stations that are needed in our communities. The Colyton fire service are a hard working group, and have been involved in some of the most devastating fires in the region.

Colyton geographically is situated in small distance from neighbouring towns, making its fire station not only a life line for colyton itself, but for surrounding areas, thus being one of the best back up stations equally, supporting other departments.

Not only is the practical function of the station a vital amenity in our community, but also the historical value it brings to our town. Colyton Fire Station (known as station number 37) was founded in 1641 by The Feoffees, who have supported many public initiatives, beginning with the founding of Colyton Grammar School in 1546. An early water supply was introduced in 1641 when they arranged for 'spring water to be channelled into a leat (ditch), cut through meadows and collected in a 'large underground tank' which is still in existence.

Do not forget that fire services do not only fight fires. They are a vital support line when attending RTCs and other non-fire related accidents.

This petition is to make those responsible for the decision to revise their thoughts and keep our fire station where it is.

Please sign and make this known to all.

We will fight for our fire station.

Colyton, the most Rebellious town in Devon.

Changes need to be made, but let's make sure they are the right ones

4.5 The hard copy petition statement was as follows:

A change to our emergency services is being proposed and all of the options within the proposal will result in the closure of Colyton Fire Station, putting many lives at risk.

As a community, we cannot let this happen, especially with our rural roads and sparse fire stations. Recent callouts prove the need to have this vital service situated in Colyton, so it must not go ahead.

There has to be an alternative to the closing of these fire stations much needed in our communities. The Colyton fire service are a hard working group, and have been involved in some of the most devastating fires in the region.

Colyton is situated a small distance from neighbouring towns and villages, making its fire station not only a life line for Colyton, but also for surrounding areas. It is one of the best back up stations to equally support others.

Fire services do not only fight fires, but are a vital support line when attending RTCs and other non-fire related emergencies.

We are petitioning those responsible for the decision to close Colyton Fire Station to revise their thoughts and keep our fire station where it is.

If changes need to be made, they need to be the right ones which do not endanger lives.

4.6 A further 90 people signed the following petition statement:

We the undersigned are concerned citizens who urge our leaders to act now to save Colyton Fire Station from closure.

Petition relating to Porlock Fire Station (4,818 signatures)

4.7 A petition relating to the proposed closure of Porlock Fire Station was signed by **4,818** people. 1,231 signatures were handed to DSFRS staff at a consultation event in Porlock, and 2,567 people signed a paper copy of the petition with the following cover letter:

As you would expect there are a wide range of reasons for keeping the station open but the principle ones are shown below:

- 1. 25% of the population are over 60 v 11% in Somerset. This is significantly greater than the average vulnerability which is not accounted for in your paper.*
- 2. By your own admission this area of Exmoor is being offered a poorer response time yet a quick response (less than 10 minutes) is identified as they key to saving life and property.*
- 3. Loss of co-responders.*

4. Climate change – moorland fires/flash floods. Saddleworth Moor being a recent example.

5. Known lack of availability of Minehead second engine and Lynton engines. The paper provides no evidence that this will improve.

6. Houses burn as well today as they will tomorrow.

7. No account of the massive increase in tourist population in summer season.

8. The community will continue to pay the same tax as before but receive a poorer service.

9. The rural areas are again being penalised at the expense of the urban elite.

10. Porlock Fire Station has 85% availability and was your top fire station last year.

You will be aware that the potential closure is opposed by all the principal authorities here in Somerset including Somerset West and Taunton District Council, Minehead Council, all parish councils and our local MPs.

The village is not opposed to the development of a more efficient and effective service but the arguments provided do not indicate this is the case.

3798 people demand that Porlock Fire Station is removed from the potential list of stations earmarked to close.

4.8 A further 1,020 people signed the petition online, 150 of whom made comments around:

- The fire station as a 'vital' and cost-effective resource, especially within a moorland area

"The amount of money saved by scrapping a volunteer-run service is so trivial in comparison to the costs incurred when a fire devastates or even ends somebody's life qualifies this for 'no-brainer' status. What a travesty!"

"To close this station at the foot of Exmoor, is ludicrous...lives are going to be lost if this station closes"

"This is a rural area and they have a large area to cover across Exmoor & are regularly called to accidents on Porlock Hill & moor fires. Without them many lives could be lost they do an amazing job..."

"Really important for this very rural community and Exmoor that this station stays open!"

"I think it would be folly to close this station. Last year there were horrific fires on moorland in the Peak District so that experience shows an immediate response is vital"

"Born and bred in the village, I know the importance of maintaining this crucial service. The team work tirelessly during any blazes on Exmoor and due to their location, the Porlock team are in the best position to be first on the scene and help stop the spread"

"All the fire stations around Exmoor National Park need to be kept manned due to the fire risk on the moor and to the properties in and surrounding the moor. It only takes 1 cigarette butt to start a horrendous fast moving moorland fire! 1-2 hours to get distant fire brigades to the moor and everything is LOST! Humans, Endangered Exmoor Ponies and Wildlife, Habitats for insects, ancient trees and Lichen! ALL GONE Possibly FOREVER!!!!"

- The importance of a suitable 'in situ' fire and rescue service given the difficult access routes into Porlock and its rural isolation

"In our isolated community the loss of the fire station will cost lives"

"This essential service should remain in Porlock. Travelling times in the general area can be complicated, retaining a network of coverage is a must, to maintain the effectiveness of this precious service"

"Vehicular access to Porlock is very difficult, especially for larger emergency vehicles, so it would make sense to have a fire station and vehicles in situ. I would think in winter and during inclement weather access would be very hampered, surely a risk assessment has been carried out! The buildings are old and possibly more at risk to fire damage"

"It takes time to get places on the countryside that's why we need...local fire stations and smaller vehicles to negotiate narrow roads larger fire engines just can't get to"

"The roads are tiny and difficult, especially in winter, and it makes no sense to downgrade or eradicate an essential service"

"Porlock fire crew...are the only fire station to quickly get to the steep & windy roads up to Lynmouth & Lynton where accidents happen in bad weather & with accidents"

- The importance of the Porlock crew as first responders and in offering resilience to other local fire and rescue crews

"Our firefighters are vital to the village, as co responders they have helped me in an emergency, minutes are crucial to save lives"

"This is vital for our Community not only for firefighting but also as First Responders"

"This Fire Station & the retained Firemen are valuable to the Porlock Community to help with not only fires but as First Responders"

"It's a crucial service not just in terms of firefighting but emergency and medical care. Porlock Fire Station is an essential service to the local and wider community"

"I am signing because I believe Porlock Firefighters provide an essential Emergency Fire, Rescue and "Medical response to their local community as well as providing resilience to the wider areas in the event of large or major incidents"

"Porlock fire station provides valuable back up to rural areas across West Somerset and into North Devon. If this station closes it will cost lives"

- The local knowledge of Porlock's firefighters

"Firefighters at retained stations have local knowledge which is crucial in rural areas"

"I'm signing because remote places need cover which takes account of slow roads and the necessity of local knowledge"

- The possibility of risk to life and property as a result of longer response times from neighbouring fire stations

"Being miles away from the next nearest fire rescue service means that the time it takes to reach the village could be costly to lives"

"Closing this station will put people's lives at risk, not just from fires but road accidents etc, let alone properties & businesses!"

"Porlock Fire Station is essential for the area given the population and moorland. Minehead would be the nearest after and even with the best will in the world, the time it will take to get to a fire can and will make a difference to either life, buildings, or moorland"

"Local lives matter this is a disgrace that if this closes it would take far to long for anyone to reach these villages to save lives"

"The cuts Devon and Somerset are proposing are dangerous, to lives of the public, lives of firefighters who will have to wait much longer for backup, to property and will affect tourism if large areas of Exmoor burn"

"In the country where distances and travelling time can make a difference between life and death we should not be reducing the coverage. It is 15 minutes to the nearest station, too long when it is life and death"

"There is no way that a fire tender could reach Porlock, and particularly its hinterlands, in less than an hour from Lynton or Minehead - so this proposal is consciously putting property and lives at risk"

"Various friends and family owe their lives and property to the fantastic fire crew of Porlock over the years - car accidents, house fires, chimney fires, first responder requests, arson and wildfires amongst other situations. Without them the distance and time factors of crews coming from elsewhere could have meant totally different outcomes. To close this station would be to put lives at risk. Why???"

Petition relating to Kingston Fire Station (544 signatures)

4.9 **544** people signed an online petition objecting to DSFRS's proposals for Kingston Fire Station, 69 of whom made comments around:

- The fire station as a 'vital' resource within a remote, rural area

"It is so important to have such an amazing and life saving service in such a rural area"

"We need fire and emergency services in remote locations. It's insane to reduce coverage to effectively zero"

"This station needs to be kept as a vital source for rural area and for during floods, farm animals, and assistance for fires and RTC"

"This is a vital emergency service for a remote community. It's necessity has been proven on many occasions by the fast response of the excellent local crew"

"Such a vital service for a remote village and surrounding areas. We should be protecting our first response services, not making cuts!"

"It's important that small rural communities have their own provision to deal with local emergencies. Seconds count and being closer to the scene means lives are more likely to be saved and properties spared from greater damage"

"I feel it is important that we keep these small community fire stations active. Yes it is in a rural location, which also supports surrounding villages, like Bigury, Bigbury on Sea and Ringmore. Having to wait for Modbury, Kingsbridge or Ivybridge to arrive on scene could be a cost to human and livestock lives. Reconsider and keep Kingston Fire Station off the closure list for good"

"I can't really believe remote village Fire Station's such as Kingston are being considered for closure. As long as there are volunteers to run it, it should be kept as a fully operational unit. Village fire stations like Kingston save lives, not just fast response for fires, but fast response for car accidents, etc. This is one thing you CANNOT centralise."

- The local knowledge of Kingston's firefighters

"Rural areas need a local fire station, that knows how to get to the remote addresses. It's a vital service"

"Local knowledge saves lives"

- The importance of the station's 4x4 vehicle in quickly navigating the narrow and difficult to access local roads - and of the station more generally in light of the many thatched properties in the area

"I find it beyond belief that a remote village Fire Station, such as Kingston, is being considered for closure. As long as there are volunteers to run it, it should be kept as a fully operational unit. They have a smaller appliance, perfectly suited to the narrow lanes for fast access not only to the village but also to Ringmore and Challaborough, which has a large tourist population"

"I'm signing because I know this area well as a visitor and understand how difficult it would be for alternative fire stations to respond quickly. Even if a small appliance such as that at Kingston were based elsewhere the prevalence of narrow lanes adds to response time and lives could be lost"

"This is a vital specialised service for a difficult to navigate rural area"

"In a rural area with a lot of farm land around, there is always a chance of field fires in the summer, a local fire service could help stop the spread of fire to any thatched cottages or other houses in the locality"

"I know there are a number of thatched buildings in the village, which must have a higher risk of devastating fire, than your average dwelling. Please keep this station OPEN"

"I live in the village and this is a great asset, so many thatched cottages in the village and surrounding areas, response times would be severely affected by closing"

"I live in a small village not far from Kingston fire station with 14 thatched cottages and I know Kingston fire crew would be the first on scene"

- The fire station as a local community resource more generally

"The Fire station is part of the village and valuable asset to the community"

"Can't let this station close it's a vital part of the community"

"It's a vital local service. Local knowledge, wide coverage, volunteer status, the only 4wd pump. It's crazy to lose experienced fire fighters"

- The necessity of resilience to cope with the tourist influx during the summer

"This is a volunteer led station and we need local appliances especially in the summer tourist season"

- The possibility of risk to life and property as a result of longer response times from neighbouring fire stations

"Closing fire stations means that people will die! Less response times is not the way forward"

"Closing the station will increase the risk to local communities. Habits may have changed but risks haven't - they just come from different sources. Short-sighted, typical bean counter approach"

"This will put lives at risk. If applying H&S Logic to the current situation the reduction of risk should be top priority as far as reasonably practical"

"You cannot put lives at risk. Vital minutes, even seconds, will be lost whilst waiting for help from stations further afield..."

Petition relating to Torbay fire services (513 signatures)

- 4.10 The following online petition, organised by the Torbay Liberal Democrats, was signed by **513** people:

Local residents have been outraged by the proposals put forward by the Devon & Somerset Fire & Rescue Service, which would see Paignton Fire Station only being manned full-time during the day, Brixham Fire Station losing one of its daytime fire engines and the number of fire engines at Torquay Fire Station being reduced from three down to two.

The proposal to reduce services in Paignton is particularly concerning, given that the station is in the heart of one of Torbay's most deprived wards, where the risk of fire is greater.

These proposals form a part of wider plans by the service in a bid to save £8.4 million, which would see eight fire stations being closed, a reduction in fire engines and a number of stations reduced to day crewed across Devon and Somerset.

In Torbay, the proposals would mean that there would be only one crewed fire engine available during the night.

Lee Howgate, Liberal Democrats Prospective Parliamentary Candidate for Torbay and Councillor for Goodrington-with-Roselands, said, "The safety of residents must not be put at risk. I am particularly disturbed by the fact that, whilst Exeter will continue to have two full-time fire units at night, Torbay will only have one, despite the fact that it has a bigger population."

Torbay Liberal Democrats are petitioning the Devon & Somerset Fire & Rescue Service to urge them to reverse their proposed cuts in Torbay. This is in light of Torbay's particular needs as a community, which includes a high number of summer visitors, a large number of older multiple occupancy buildings and a high number of vulnerable and elderly residents.

We the undersigned call upon Devon & Somerset Fire & Rescue Service to reverse the proposed cuts to fire services in Torbay, which include Paignton Fire Station only being manned full-time during the day, Brixham Fire Station losing one of its daytime fire engines and the number of fire engines at Torquay Fire Station being reduced from three down to two.

Standardised submission relating to the consultation generally (102 signatures)

- 4.11 The letter below was developed by a local Labour Party protest group and signed by 102 people who attached their name and address to it if they supported the content.

I ask that you vote against all options proposed in the Safer Together consultation document for the Devon and Somerset Fire and Rescue service for the following reasons:

- All options put forward in the consultation will put firefighters and the public at risk.
- The options proposed do not provide sufficient detail for the improvements claimed, particularly information on how the on-call system would be improved, how extra prevention and protection will be achieved, or how much would actually be reinvested in the service.
- That the data given in the consultation is flawed and has an unachievable expectation, in that there is an assumption made that, after the cuts, all assets will be available at all times. This gives the false impression that the risk of fire deaths will reduce if the proposals are agreed, whereas statistically it is likely that risk would increase.
- The revised attendance times make no reference to properties that may be disadvantaged by the proposed changes.

In addition to the points above, the consultation document is complicated and asks members of the public to select options that require knowledge of operational issues within the Fire Service, which is totally inappropriate.

It should also be noted that if the proposals were to be adopted, around one-third of the residents of Devon and Somerset, more than 600,000 people, will see a slower response from the Fire and Rescue service. This is unacceptable. Please ensure you vote against all the options.

I ask that you acknowledge receipt of this letter, and thank you for your attention.

Yours sincerely,

Note on petitions and standardised submissions

- 4.12 Petitions and standardised submissions are clearly important in indicating public anxiety about important aspects of the 'Safer Together' proposals and so DSFRS must treat them seriously.

- 4.13 Nonetheless, it should also be noted that they can exaggerate general public sentiment if organised by motivated opponents; and in this case there has been considerable local campaigning about the proposed changes to fire services. Moreover, and particularly with respect to online platforms, it can be difficult to demonstrate that people have engaged with and understood the context for the proposals prior to signing in opposition to them.
- 4.14 Petitions should never be disregarded for they show the strength of local feeling and these observations do not discredit the petitions submitted in any way. However, they do provide a context within which they should be interpreted.

5. Consultation Programme Reviewed

ORS's Commission

- 5.1 Because of our experience with important statutory consultations across the UK, and our consultation projects for most of the UK fire and rescue services, ORS was appointed by DSFRS to review its consultation outcomes and methods on an independent basis. DSFRS's *Consultation Report* to the Fire Authority says:

To demonstrate our commitment to conducting a fair and transparent consultation process, an independent social research organisation, ORS (Opinion Research Services) was commissioned to analyse, evaluate and produce a Findings Report of all consultation responses received; and

[A]n independent third party (Opinion Research Services) has been commissioned to conduct an objective analysis of all the consultation responses and produce an interpretative report, including an executive summary and conclusions, to help inform the Fire Authority's decision-making process.

- 5.2 In the chapters above, we have analysed and reported the consultation responses. It is not our role to 'make a case' for any option or variant, so we do not to make recommendations on the merits of the options for change or to how the Fire Authority should appraise them. However, we have also been asked to review the consultation programme itself, and here some recommendations are appropriate. ORS had no part in the design and implementation of the consultation programme, so we may comment on independent basis.

Consultation Principles

- 5.1 The good practice requirements for consultation are expressed in the so-called Gunning principles - namely that consultation should:

Be conducted at a formative stage, before decisions are taken;

Allow sufficient time for people to participate and respond;

Provide the public and stakeholders with enough background information to allow them to consider the issues and any proposals intelligently and critically; and

Be properly taken into consideration before decisions are finally taken.

- 5.2 The best way of fulfilling the first of the four Gunning Principles, that consultation should be done at a formative stage, is to conduct a two-stage consultation. The first phase should be an open-ended consideration of the issues, to assist the Authority to formulate its ideas and options; the second stage is then called formal consultation on the resulting proposals.

- 5.3 In this case, we understand that DSFRS conducted an engagement phase consisting of an online questionnaire (with 82 respondents), four focus groups (with a total of 49 members of the public), and an Options Workshop (with three members of the public, four DSFRS staff and one FBU representative). It is also important that no implicit decisions are taken before the formal consultation has been completed and properly considered, and we believe that is the case here.
- 5.4 The 12-week formal consultation period was conscientious in its length and in promoting the consultation through all the following: wide-ranging effective publicity; an accessible open questionnaire; and 27 local drop-in sessions that were attended by many senior officers and staff, and provided detailed information on the local proposals.
- 5.5 The Fire Authority will know that the fourth Gunning requirement, that consultation outcomes should receive due consideration, is particularly important in this case, given the scale of opposition to the six main options.

Accountability

- 5.6 Consultation promotes the accountability of public bodies and assists their decision-making. To be accountable, public bodies should *give an account* of their plans or proposals and *take into account* the public and stakeholder responses in order to:
- Be informed of issues, arguments, viewpoints, implications or options that might have been overlooked in their proposals
 - Re-evaluate matters already known
 - Review priorities and principles.
- 5.7 This does not mean that consultations are referenda. For the requirement to conduct fair and accessible consultations, report their outcomes, and consider the findings properly does not mean that majority opinions should determine public policy. The popularity or unpopularity of proposals should not displace professional and political judgement about what is the right or best decision in the circumstances. Of course, levels of support/opposition, and the reasons for or against, are important – but as considerations to be taken into account, not as factors that dictate authorities' decisions.
- 5.8 In other words, the consultation programme itself, however extensive, should not be interpreted as yielding a definitive 'decision' for the Fire Authority. For, in addition to the considerations above, consultation outcomes should be considered alongside all the other information available to the Service and the Authority about the likely impact of each of the proposed options. For the Fire Authority considering the outcomes of this consultation, the key question is not '*Does the proposal have majority support or opposition?*' but, '*Are the reasons for the popularity or unpopularity of the proposals cogent?*'

Focus and scale of the consultation

5.9 The consultation focused mainly on six proposed options for emergency cover across Devon and Somerset, but an open-ended seventh option was also included to allow respondents to suggest alternative combinations of any of the elements included in options 1-6. The seven options were presented to the public as:

Option 1 – Station closures [proposed for eight stations]

Option 2 – Station closures *and* removal of all third fire engines [the removal of all third fire engines would affect four stations]

Option 3 – Station closures, removal of all third *and* some second fire engines [the removal of some second fire engines would affect four stations]

Option 4 – Station closures, removal of all third and some second fire engines *and* change of status to day crewing [the day-crewing change would affect three stations]

Option 5 – Station closures, removal of all third and some second fire engines, change of status to day crewing, *and* change of status of second fire engine to on-call at night only [the night-time on-call proposal would affect 14 stations]

Option 6 – Station closures, removal of all third and some second fire engines, change of status to day crewing, change of status of second fire engine to on-call at night only, *and* introduction of day-crewed roving fire engines

Option 7 – Mix and match option, to include any combination of the elements used in the other options.

5.10 Quite rightly, the Fire Authority added the seventh ‘mix and match’ option in which respondents were invited to select any of the elements from across the six options. That was a worthy and good idea, but it meant that (counting station-by-station and fire-engine-by-fire-engine) the six options comprised at least 35 individual proposals – so most respondents found the ‘mixing and matching’ exercise daunting, and no particular strategy emerged from the many open-text responses (though some respondents put forward quite technical arguments for DSFRS’s consideration).

5.11 In total, 3,818 responses were received from the public: 3,232 completed questionnaires, 205 written submissions and 381 email responses. In addition, five petitions were submitted with a total of 43,644 signatures opposing the proposals.

5.12 Most responses to the questionnaire were from respondents identifying themselves as individual members of the public or DSFRS staff, but a significant number of organisations and other types of respondent also submitted their views via the questionnaire. In total, at least 94 organisations and other types of respondents submitted questionnaires.

5.13 DSFRS also conducted 27 Drop-in sessions across the two counties and engaged extensively with social media. DSFRS was right to recognise that public meetings are not normally a constructive way of achieving effective consultation. Instead, therefore, the Service ran 27 Drop-in Sessions across a wide range of locations, including the areas most affected by the proposals. Plenty of senior officers

(including the top two tiers) and other staff attended and conversed readily, at length and in-depth with attendees. There was also plentiful information available at the venues to enable members of the public and stakeholders to understand the rationale for the proposals. Some of the meetings were ‘difficult’ due to the numbers attending and their keenness to challenge the proposals; but others were thoughtful and deliberative.

Open questionnaire

- 5.14 DSFRS rightly used an open questionnaire as a central feature of its consultation, because such an approach is inclusive in giving everyone an accessible opportunity to respond if they wish. However, there are two main points about the effect of the consultation questionnaire that the Fire Authority will wish to consider in order to understand the findings in context.
- 5.15 The first is that the questionnaire was conscientious, but also demanding on potential respondents in including nine open-ended text questions. It is not a criticism, but simply a fact of life that the inclusion, in the printed version, of nine almost-blank A4 pages where respondents were asked to explain their ideas for each option was a daunting prospect for many potential respondents.
- 5.16 While the number of open-ended text questions will have reduced the number of respondents, the interconnectedness of the six options led most of those who responded to write lengthy, repetitious comments on each of nine pages, focusing usually on their least-liked option – thus making it impossible to assess the relative levels of support for the different elements of the six options (see below).
- 5.17 It is not a criticism to note that an open questionnaire is not a representative survey of public opinion. The Fire Authority will know that, typically, open questionnaire respondents are more likely to be both more motivated and more critical of proposals than the general population.
- 5.18 Of lesser importance is that the questionnaire used a numerical 11-point response scale (from zero for ‘Poor’ to 10 for ‘Excellent’) when a five-point scale (Very poor / Fairly poor / Neither good nor poor / Fairly good / Very good) would have been more balanced, simpler and familiar to respondents.

Drop-in sessions

- 5.19 DSFRS was extremely conscientious in running 27 Drop-in Sessions across a wide range of locations, including the areas affected by the more radical proposals. The author of this chapter attended two events, in Barnstaple and Bideford, and was impressed by the commitment of officers and support staff in conversing with visitors in detail and at length about the principles and details of the service models under review. As the Fire Service reports, many people attended and many of them will have spoken to officers/staff as well as reading the display boards.
- 5.20 The picture below shows the Barnstaple drop-in where 39 people attended between 1.30 and 5.30pm. The highest attendances were at Porlock (330), Ashburton (203) and Kingston (138), while the lowest was in Bideford (8). The meetings took place usually during a morning or afternoon, though three (at Kingston, Exeter and Paignton) finished at 6pm and the Exmouth and Colyton events ran until 7pm (having started at 3pm).



- 5.21 However, while such events are ‘deliberative’ and often avoid the confrontations that can arise in big public meetings, they are oriented to providing information rather than consulting the public. Of course, officers and support staff listened to attendees, but many of the latter will have been disinclined to challenge or give very negative reactions in one-to-one situations.
- 5.22 External demonstrations in opposition to DSFRS’s proposals, which were very prominent at some sessions, will also have influenced participants and it will have been difficult to counteract their effects within the meetings. The picture below shows the small demonstration outside Barnstaple Library.



- 5.23 Each drop-in session had a ‘log sheet’ to record common questions (which then informed further meetings and updates to the website) and the numbers attending.
- 5.24 Yet it remains hard to know visitors’ genuine/final opinions from such sessions, particularly since there was no organised way of taking feedback systematically and anonymously. Certainly, people were given or were referred to the consultation questionnaire, but it is impossible to monitor whether those who attended the drop-ins were, afterwards, more likely or less likely to have approved of the proposals following their discussions at the meetings. On the whole, the stark majority of opponents to supporters in the questionnaire returns suggests that few were convinced, even in the drop-in sessions.

5.25 The cost of the 27 drop-in sessions is a factor to consider in relation to their lack of measurable outcomes. For while the venues may have been inexpensive, the costs in senior officer and staff attendance time (as well as the set-up, publicity and organisation) will have been very considerable.

Understanding the Levels of Opposition

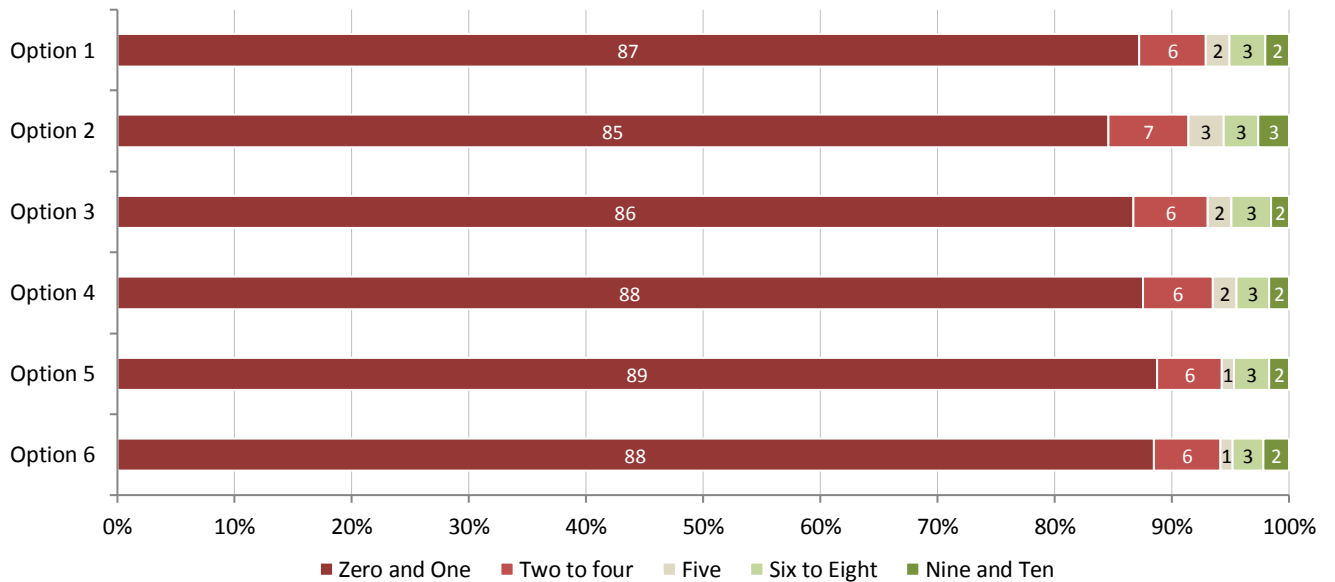
Introduction

5.26 The consultation done by DSFRS on behalf of the Fire Authority was extensive and conscientious in its scale, scope, accessibility and honesty in clearly stating its proposals. Public authorities are not always so conscientious in disclosing the scale and scope of their proposals.

5.27 The questionnaire invited respondents to assess or score the main six options on a zero to ten scale, where zero meant ‘poor’ and ten meant ‘excellent’. The chart below shows that responses were overwhelmingly critical.

5.28 Overall, as we have seen, 95% of respondents (nineteen out of twenty) clearly opposed all six options, with scores of ‘zero’ to ‘four’, and nearly nine in ten gave scores of ‘zero’ or ‘one’. Only 5% respondents gave scores of ‘six’ to ‘ten’. Many respondents gave the lowest possible score of zero. The table on the next page shows the balance of opinion starkly.

Scores for the main six Options on a 0 to 10 scale (0 is “poor” and 10 is “excellent”)



Scores of zero and 1 (“Poor”) are shown in deep red; scores of two to four are in paler red; scores of 5 (the intermediate point) are shown in beige; scores of six to eight are shown in light green; and scores of 9 and 10 (“Excellent”) are shown in deep green.

- 5.29 Changes to emergency cover arrangements are always likely to be criticised, but it seems that in this case there were factors that increased the level and intensity of the opposition to particularly high levels, beginning with the way in which the six main options were presented to the public.

Six Options

- 5.30 Perhaps most importantly, the presentation of the six main options as essentially ‘interconnected’ worsened their reception by ensuring that they were all judged by the standards of the most unpopular. For example, the closure of eight fire stations (option 1) might be expected to be the most unpopular proposal, whereas the removal of the third fire engine from four stations (*part of* option 2) would be less unpopular. However, these two proposals were presented together as a ‘package’, so they could not be judged separately by respondents.
- 5.31 The main problem was that DSFRS’s option 2 (removal of third fire engines) also included option 1 (closure of eight fire stations); its option 3 included both options 1 *and* 2; its option 4 included options 1 *and* 2 *and* 3; and so on. Therefore, the most unpopular option 1 (closure of eight fire stations) was included as an integral part of all the other five options. This presentation meant that if respondents disagreed with option 1 (closure of eight fire stations) (as most of them clearly did), then they were logically committed to disagreeing with all the other options, because each of them contained the proposal to close the fire stations.
- 5.32 Had the different elements of each option been presented separately, respondents could have judged them separately, without being logically committed to rejecting them all because they disliked one or more elements. Ideally, the options should have been treated like this, with a response scale for each option:

To what extent do you agree or disagree with each of the following:

Station closures

Removal of all third fire engines

Removal of some second fire engines

Change of status to day-crewing

Change of status of second fire engine to on-call at night only

Introduction of day-crewed roving fire engines

- 5.33 That approach would have allowed the relative acceptability or unacceptability of each element to have been assessed (which is not possible when they are packaged together like Russian Dolls).
- 5.34 As well as stopping respondents judging each element separately, the packaging of the options implied to many respondents that DSFRS is determined to close the designated fire stations, since that proposal was included in all six main options.

Open questionnaire

- 5.35 DSFRS rightly used an open questionnaire as a central feature of its consultation, because such an approach is inclusive in giving everyone an accessible opportunity to respond if they wish. However, there are two main points about the effect of the consultation questionnaire that the Fire Authority will also probably wish to consider in order to understand the findings in context.
- 5.36 The first is that the questionnaire was demanding on potential respondents in including nine open-ended text questions. It is not a criticism, but simply a fact of life that the inclusion, in the printed version, of nine almost-blank A4 pages where respondents were asked to explain their ideas for each option was a daunting prospect for many potential respondents.
- 5.37 While the number of open-ended text questions will have reduced the number of respondents, the interconnectedness of the six options led most of those who responded to write lengthy, repetitious comments on each of nine pages, focusing usually on their least-liked option – thus making it impossible to assess the relative levels of support for the different elements of the six options.
- 5.38 It is not a criticism to note that an open questionnaire is not a representative survey of public opinion. The Fire Authority will know that, typically, open questionnaire respondents are more likely to be both more motivated and more critical of proposals than the general population.
- 5.39 Of lesser importance is that the questionnaire used a numerical 11-point response scale (from zero for 'Poor' to 10 for 'Excellent') when a five-point scale (Very poor / Fairly poor / Neither good nor poor / Fairly good / Very good) would have been more balanced, simpler and familiar to respondents. The 11-point response scale was unduly 'academic' and suggests, spuriously, that responses can be measured with some mathematical precision.

Drop-in sessions

- 5.40 DSFRS was right to recognise that public meetings are not normally a constructive way of achieving effective consultation. Instead, therefore, the Service ran 27 Drop-in Sessions across a wide range of locations, including the areas most affected by the proposals. Plenty of senior officers (including the top two tiers) and other staff attended and conversed readily, at length and in-depth with attendees. There was also plentiful information available at the venues to enable members of the public and stakeholders to understand the rationale for the proposals. Some of the meetings were 'difficult' due to the numbers attending and their keenness to challenge the proposals; but others were thoughtful and deliberative.
- 5.41 However, there were no arrangements for an organised way of taking feedback systematically and anonymously; so it is not known whether those attending the 27 events were afterwards more likely or less likely to approve the proposals.

Counties-wide approach

- 5.42 The Fire Authority and DSFRS were conscientious in conducting a counties-wide consultation exercise across Devon and Somerset. However, this worthy approach seems to have elicited an unremitting

campaign of opposition by the unions and others, and to have raised public concerns which it was hard for DSFRS to counteract effectively, at least in a measurable way in the open questionnaire responses.

- 5.43 For example, the counties-wide approach meant that it was not possible for the single consultation document to carry sufficient local data (for about 35 separate proposals) to be convincing to potential critics – which meant that it was easier for campaigning opponents to galvanise opposition to the proposals.
- 5.44 Of course, as we have said, there was plenty of detailed local information in each of the 27 drop-in sessions, but it was nonetheless hard to communicate the relevant data widely. While a counties-wide approach was not ‘wrong’, with the benefit of hindsight, it might have been better to conduct more local and focused consultations in the affected areas.
- 5.45 The Fire Authority has also to consider whether, within the context of a cross-counties approach, its consultation within the most affected areas has been sufficient. Future consultation on what to the public might seem radical options could be done with a more targeted approach, for then the consultation document(s) could carry more specific evidence for local proposals.

Consultation Methods

- 5.46 In the context of determined trade union campaigns, intense media publicity, and wide-ranging proposals that the public believe (rightly or wrongly) are radical, it is always hard for a fire and rescue service to get a ‘fair hearing’. The public are often inclined to trust serving fire fighters who oppose the proposals rather than the management who are said to be proposing ‘cuts to the service’.
- 5.47 Some of the consultation responses received complain that DSFRS did not attend public meetings that were arranged by town councils or others in some of the affected areas. We normally recommend that (if specifically invited) fire and rescue services should send a representative to such meetings to listen to the opinions expressed while not addressing the meeting (since that would be a precedent for other such meetings). This approach is low-key, economical and demonstrates that consultation is primarily a ‘listening and learning’ exercise. In this case, of course, the DSFRS put a lot of its resources into the 27 drop-in sessions across the counties.
- 5.48 Deliberative consultation (through forums, workshops and focus groups is sometimes called ‘qualitative’ consultation (in contrast to ‘quantitative’ consultation through questionnaires or representative surveys)) is normally done with staff, stakeholders, members of the public and special interest or vulnerable groups. In contrast to public meetings and open questionnaires, these are key methods for achieving a ‘fair hearing’ for complex and/or unfamiliar and/or controversial proposals.
- 5.49 All forms of consultation are important, and none should be disregarded, but deliberative meetings can be particularly worthwhile in exploring the arguments and the reasons for people’s opinions.
- 5.50 In some consultations there is a place for a residents’ survey based on proper sampling techniques to achieve a representative sample of respondents, subject to two important requirements:

The representative survey should not be interpreted as a quasi-referendum; and

The survey should not make the open consultation questionnaire redundant because that is an important route for anyone and everyone to make known their opinions.

- 5.51 Subject to these provisos, residents' surveys have played an important part in many of ORS's more controversial consultations by providing a basis of comparison with the results of open questionnaires. One is not necessarily more important than the other; both should be considered for a more complete profile of public opinion.

Way forward?

- 5.52 For the reasons explained, the consultation outcomes show a stark 95-to-5 ratio of opponents to supporters, not only in relation to the closure of eight fire stations but for all six options. While consultations are not referenda, these findings are very striking and unusually critical.
- 5.53 One difficulty is that there was little in the consultation to provide a more balanced picture of general public opinion: with the benefit of hindsight, deliberative consultation and scrutiny through representative forums or focus groups and/or a representative residents' survey could have provided valuable information about public perceptions of the proposals when fully explained.
- 5.54 The Fire Authority and DSFRS are faced with difficult decisions following this consultation's outcomes. There are reasons to implement the proposals; yet the Authority should assess its reputation risk and the possibility of legal challenges, given the outcomes. Overall, the Fire Authority should consider how the methodological issues we have highlighted have magnified opposition to the proposals while also considering how its proposals could be amended to make them more acceptable.
- 5.55 There is no single 'right' approach, but on balance ORS recommends that it would be wise to prioritise the proposed changes and then to subject them to scrutiny in sequence through more local and focused deliberative and/or representative consultations in the affected areas.

Main recommendations

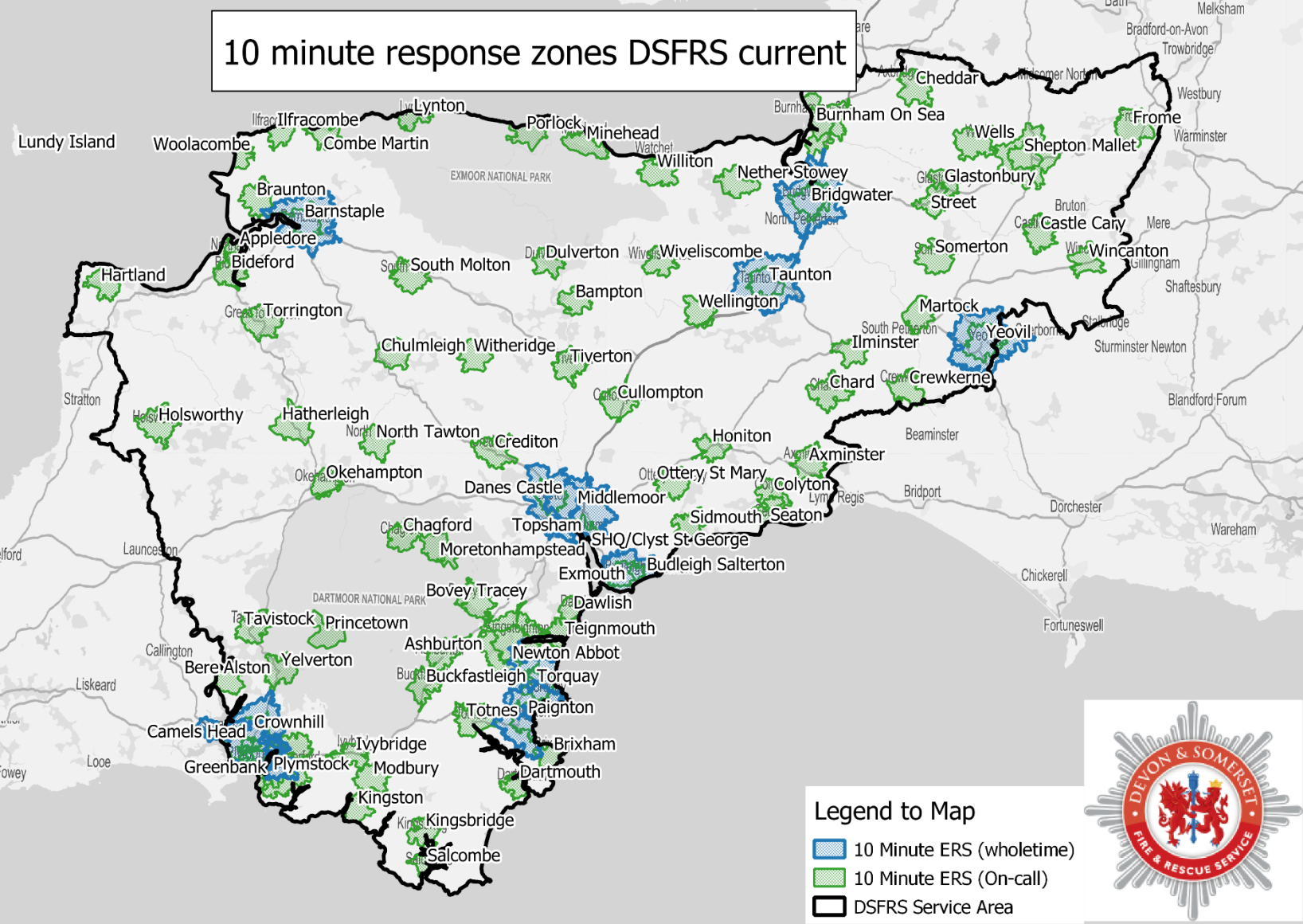
- 5.56 Therefore, for the reasons given above, we recommend that DSFRS and the Fire Authority should:
- Consider the consultation outcomes in depth while noting how some features of the consultation exercise have magnified opposition;
 - Rethink, prioritise, and re-present its key proposals in a more graduated way;
 - For each proposal, target further consultation more locally in the affected areas using several shorter and more location-specific consultation documents;
 - Continue *not* to use public meetings as key parts of the consultation, but to be prepared to attend ones organised by other bodies, albeit only in a 'listening mode';
 - Continue to use an open questionnaire, but also seek ways of eliciting general public opinion – to compare one with the other;

Recognise the advantages of using representative and independently facilitated deliberative forums, workshops and focus groups as the best way of giving controversial proposals a 'fair hearing' and comparing people's 'before-and-after' opinions; and

Consider whether it would be appropriate to conduct a representative survey based on proper sampling.

DWELLING FIRE EMERGENCY RESPONSE STANDARDS

10 minute response zones DSFRS current



ROAD TRAFFIC COLLISION EMERGENCY RESPONSE STANDARDS

15 minute response zones DSFRS current

