

**Statement by Buckinghamshire & Milton Keynes Fire Authority  
(Representor Number 002) in response to Matter 4**

**Introduction**

1. This statement is made by the Buckinghamshire & Milton Keynes Fire Authority (“BMKFA”) in response to Matter 4 of the Inspector’s Matters and Issues paper in respect of the examination-in-public of Wycombe District Council’s (“WDC”) Delivery and Site Allocations Plan (“the Plan”).
2. BMKFA is a Combined Fire Authority, which makes the final decisions on plans, policies and resources needed to ensure that the Buckinghamshire Fire & Rescue Service (“BFRS”) delivers an efficient and effective fire service. BFRS employs approximately 550 fire fighters who operate from 20 strategically placed locations, one of which is Princes Risborough Fire Station (“the Station”).

Consultation

3. It is important to set out the consultation history for this policy, as it explains why BMKFA did not put forward any formal representations at the final submission stage.
4. On 29<sup>th</sup> November 2011, Jo Singleton (a planning policy assistant at WDC) e-mailed the Station Commander for Princes Risborough (who is also the Station Commander for High Wycombe) seeking comment on the Draft Plan, in particular in relation to proposals for Princes Risborough. As a result, the issue was discussed internally by BFRS and it was agreed that the present Station met its needs.
5. A meeting was arranged on 5<sup>th</sup> January 2012 between Jo Singleton and Chris Schmidt-Reid, both from WDC planning, to clarify BMKFA’s position in relation to the suggested relocation of the Station. At the meeting, there was discussion with officers regarding the layout of the current site, and the location of the Station building within it. The conversation also explored whether there was any scope to reposition the station on the same site and possible alternative locations, which were yet to be identified. BMKFA also expressed its disappointment that the draft submission had been prepared and published without BMKFA’s direct involvement.

6. At the end of the meeting, WDC's planning officers indicated that the potential planning benefits of relocating/repositioning the Station were unlikely to justify the sum of investment required to deliver the changes. A commitment was made to amend the wording contained within the Draft Plan, and the officers commented that they were likely to redefine the areas identified for redevelopment to remove those containing the Station. The position of BMKFA was acknowledged, and WDC committed to get back in contact if developments were to be any different from those that were discussed and agreed at the meeting. No further communications were received from WDC, notwithstanding that further correspondence was entered into regarding policy HWTC10 and 18.
7. As such, when BMKFA submitted its formal response to the submission on 3<sup>rd</sup> July 2012, it focussed on policies HWTC 10 and 18. It was assumed that policy PR4 had been changed as agreed. Nevertheless, BMKFA has set out its position in this submission, and respectfully asks for it to be considered, notwithstanding the lack of a formal objection to policy PR4.

#### **Areas of Concern: Policy PR4**

8. BMKFA believes that policy PR4 is unsound for four main reasons:

##### (1) The plan does not ensure sound infrastructure planning

9. The Station is presently in the optimal position to ensure an effective standard of service in accordance with BMKFA's Public Safety Plan. As such, the policy is not "*effective*" as (i) it does not ensure sound infrastructure delivery planning and (ii) BMKFA, a key stakeholder essential to the delivery of the policy, is not signed up to it.
10. The Station has been in its current location for approximately the past 40 years. Between October 2010 and October 2012, Princes Risborough responded to 295 emergency incidents, and it continues to have one of the highest levels of RDS appliance availability, averaging in excess of 95%. Based at the Station is one standard appliance and one special appliance (Bulk Foam Carrier) which are crewed by a complement of 14 full time equivalent (FTE) Retained Duty System (RDS) staff, who operate on an on-call basis and only come into the station for training activities and emergency response. The defined response mobilising targets to

achieve for RDS is 5 minutes from time of being paged to time of mobilising from their respective station.

11. Based on recent data there are in the region of 350,000 addressable properties within the Station's response area. Based on a response asset being mobilised from the current site, BFRS is able to have an appliance in attendance at approximately 61% of those properties within 30 minutes of being mobilised. Not only is this location ideal for serving the needs of the neighbouring communities of Princes Risborough but it also supports, complements and adds resilience the other 19 response locations in serving the needs of whole of the County. In addition to this, given the location of the Bulk Foam Carrier, there are agreements with neighbouring FRS's to provide mutual assistance through sections 13 and 16 of the Fire and Rescue Services Act 2004.
12. At this time there are no identified issues which would compel BMKFA into relocating the Station; its location currently serves its needs. As such, BMKFA believes that the Station is in the optimum position to deliver an effective fire service, and that any re-location would lead to a reduction in the effectiveness of the service provided and would therefore not "*ensure sound infrastructure delivery planning*".<sup>1</sup>
13. Policy PR4 requires the relocation of the Station in terms. Unlike policy HWTC10, there is no presumption that the Station will remain unless a suitable site can be found. As such, in a context where there has been no potential site put forward by WDC, and where the alternative locations suggested for the High Wycombe Station were deemed by BMKFA to be unsatisfactory, BMKFA believes that policy PR4 should state that the Station will not be relocated (unless, of course, a better location than the present site is found). This will enable developers and BMKFA to proceed with certainty in making planning and investment decisions, thus ensuring sound infrastructure planning.
14. There is also a risk that the present wording of the policy presumes that the Station will relocate, which may lead to an inadequate site being put forward and approved. It is not clear, nor justified, why there is a difference in emphasis between policy PR4 and policy HWTC10.

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<sup>1</sup> PINS "*Examination of Development Plan Documents: Soundness Guidance*" (August 2009) section 2.10

Policy HWTC10 does not require relocation, and states that this will only occur if a suitable site has been identified, whereas policy PR4 requires relocation to take place to a “*satisfactory location*” without an alternative of the Station remaining.

15. Further, policy PR4 is not consistent with BMKFA’s Public Safety Plan for 2012-2017 (“PSP”). The PSP was approved in September 2011 following extensive public consultation, and sets out BMKFA’s strategic approach to delivering a range of efficiencies and savings, whilst minimising the impact on the safety of the public and its staff. The PSP does not provide for any reduction in the number of fire stations, and ensures no (or minimal) change in attendance time taken by the appliances to arrive at an incident and no (or minimal) impact upon the speed and weight of response.
16. There is no evidence that the PSP or the levels of public safety provided by the Station, were taken into account by WDC in preparing its Plan. Further, policy PR4 is contrary to the principles underlying the plan, as any relocation of the Station is likely to reduce the attendance time taken to respond to an incident. Consequently, the policy is contrary to BMKFA’s own strategic policies. Therefore, whilst BMKFA would like to work together with WDC to find a solution that allows WDC to deliver a sound plan, whilst not reducing the effectiveness of BFRS’ service, at present it is not able to lend its support to the policy or its delivery. The policy is therefore unsound as BMKFA, a key stakeholder that is essential to the delivery of the Plan, is unable to support it.

(2) Failure to ensure effective relocation

17. BMKFA’s primary position is that policy PR4 should be amended to ensure that the Station will not be relocated. However, if this is not accepted, BMKFA also believes that the policy is unsound because it does not require that a developer identify and provide an alternative site that fulfils the requirements of BFRS before relocation occurs. The policy merely states the re-development should “*Enable the satisfactory relocation of the fire station and public toilets*”.
18. Significantly, the existing wording of the policy:

(1) Makes no reference to the alternative site meeting the needs of BFRS, or any

consideration of how this will be judged. The word “*satisfactory*” is not sufficient to prevent a reduction in the levels of service.

(2) Does not clarify that the site must be identified, and the new station constructed, before the existing Station is closed.

(3) Does not identify who will be responsible for identifying the alternative site.

(4) Does not address the question of who will fund the alternative site.

19. As such, it is BMKFA’s position that, in order to be justified, the wording of policy PR4 should be amended to make clear that the Station will remain in its present location unless an alternative Station is found which does not lead to any reduction in the service provided by BFRS, as assessed by BMKFA. The policy should require that the new station is constructed and ready for occupation before the existing Station is closed. The explanatory text should state in terms that BFRS should not be required to operate out of temporary facilities pending the building of the new station (i.e. a turnkey agreement). Further, the policy should make clear that the Station will not be relocated without a full public consultation, and as part of BMKFA agreeing to a new PSP. Any such consultation must include gauging the public tolerance of reducing response times from another site, and balancing this against any potential benefits from the alternative site.

20. BMKFA is also concerned that it should not be required to bear any of the cost of re-location. BMKFA has agreed and set its Medium Term Financial Plan (“MTFP”) for delivering the necessary efficiency savings as part of the PSP. There are currently no assumptions within the MTFP to support the construction or relocation of a new station in Princes Risborough. It is therefore important that the policy states in clear terms that BMKFA will not bear any of the cost of re-location. If the policy does rely on funding from BMKFA it may not be deliverable, as there is no provision for this funding in the MTFP.

21. Accordingly, BMKFA believes in order for policy PR4 to be sound a new paragraph should be added to the policy which provides as follows:

*“The fire station will not be re-located from the site unless a suitable alternative site is identified by the developer which fulfils the requirement of the BFRS and which would not lead to any reduction in*

*the effectiveness of the service provided. Any alternative site must be provided before the existing station is re-located.*

22. Further, the explanatory text should state that the provision of a new station will be at no cost to BMKFA, and that any relocation will require a full public consultation as part of BMKFA agreeing a new PSP.

(3) Failure to consider reasonable alternatives

23. Finally, BMKFA believes that the policy is not justified as there is no evidence that WDC has considered an alternative of retaining the Station in its existing location. The audit trail for the policy reveals that this has not been put forward as an alternative. Given the above, BMKFA believes that this alternative is reasonable, and the failure of policy PR4 to take it into account makes the plan unsound.