

**Statement by Buckinghamshire & Milton Keynes Fire Authority
(Representor Number 002) in response to Matter 6, Q1 and Q10**

Introduction

1. This statement is made by the Buckinghamshire & Milton Keynes Fire Authority (“BMKFA”) in response to Q1 and Q10 of Matter 6 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 High Wycombe Fire Station (“the Station”).
3. In its final consultation response on 3rd July 2012, BMKFA indicated that it was content with the current location of the Station and identified some issues if it was to be moved. This response did not state that BMKFA considered the Plan to be unsound. However, after further research and consultation, BMKFA does now consider that the Plan is unsound in its current form.
4. The Inspector has indicated that BMKFA is unable to formally change its stance at this stage, but that it would be possible to respond to his Matters and Issues Paper. This submission does so, and indicates the basis on which BMKFA now believes that the Plan is unsound.

Areas of Concern: Policy HWTC10

5. BMKFA believes that policy HWTC10 is unsound for three main reasons:

(1) The plan does not ensure sound infrastructure planning

6. 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 plan 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.
7. The Station has been in its current location for approximately the last 46 years. It is one of the most active response locations within BFRS' response area, and between April 2011 and April 2012 the Station responded to 1348 incidents. The station is staffed by four watches of 11 whole-time personnel, and 12 full-time equivalent Retained Duty System ("RDS") staff, who operate on an on-call basis. Both groups of staff have defined response mobilising targets to achieve. For RDS this is 5 minutes from the time of being paged to the time of mobilising from their respective station.
8. At the present site, BFRS is able to have an appliance in attendance at approximately 52% of those properties within 30 minutes of being mobilised. Further, because of its location proximate to adjacent counties, the existing station has been able to enter into agreements with neighbouring FRSs to provide mutual assistance through sections 13 and 16 of the Fire and Rescue Services Act 2004. To ensure that BMKFA has a viable response location in High Wycombe for at least the next 15 years, over £175k has been invested in the Station over the last 12 months.
9. 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*".¹
10. This can be seen by a comparison between the Station and the proposed re-location site at Baker Street (under policy HWTC18):

¹ PINS "Examination of Development Plan Documents: Soundness Guidance" (August 2009) section 2.10

- (1) Relocating to Baker Street would increase the response time for on-call RDS staff who respond from remote locations by approximately 1 minute. This is a 20% increase to their response target.
 - (2) Based on National Land and Property Gazetteer records (June 2012), the Baker Street site can only achieve a response time of 10 minutes for approximately 39501 properties, compared with 43317 from the existing station.
 - (3) Utilizing recognised response modelling tools, it is anticipated that the proposed site would result in a net reduction of approximately 10% of residential premises which can be covered by an emergency response within the first 10 minutes, and a net reduction of approximately 3% of commercial premises which can be covered with an emergency response within the first 10 minutes.
11. Overall the proposed site would result in a reduction of 8.8% of addressable premises receiving an emergency response arriving on scene within the first 10 minutes, when compared with the current site. This is likely to significantly compromise BFRS' response target of achieving the attendance of an operational resource within 10 minutes on at least 80% of emergency incidents.
 12. Further, the Baker Street site has been identified as a mixed-use site, combining B1 business uses with residential uses. There is significant evidence that the provision of a fire station within a mixed-use residential site may cause disharmony with residents and compromise the activities that can be carried out from the Station.
 13. It is recognised that policy HWTC10 does not in terms require the relocation of the Station. However, it is important to recognise that both WDC and BMKFA have undertaken an extensive search for an alternative site. At the end of December 2011, WDC supplied a list of potential relocation sites which they had identified. This is attached as appendix one. BMKFA committed to carrying out

site visits at those sites which appeared to have potential. Other sites were ruled out as they could not possibly meet BMKFA's needs, for reasons of size, location, access etc.

14. BMKFA's position was that, if remaining at the present location was not possible, its preference was the Staples site, followed by Baker Street. That position changed when it was confirmed that Baker Street was to be a mixed-use site, for the reasons set out above. WDC then indicated that the Staples site was not a possibility as they were not in a position to purchase it. WDC Car Park (No 7) was far too small, and the British Legion Site (No 9) was not owned by WDC, and it would suffer from the same access issues as the present Station would from the planned redevelopment of the Swan Frontage. The other sites were immediately adjacent to residential premises, or were too far away from primary access roads, with the exception of Baker Street (which of course has been subsequently ruled out by BMKFA for the reasons set out above).

15. As such, the current position is that the potential site identified by WDC would lead to a reduction in the service provided by BFRS, and there are no alternative site allocations (after an extensive search on the part of both WDC and BMKFA). As such, BMKFA believes that, in order to be sound, policy HWRC10 should state that the Station will not be relocated (unless of course an improved site was identified by a developer). This will enable developers and BMKFA to proceed with certainty in making planning and investment decisions, thus ensuring sound infrastructure planning.

16. Further, policy HWTC10 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.

17. 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 HWTC10 is contrary to the principles underlying the PSP, as any relocation of the Station is likely to reduce the attendance time taken to respond to an incident, for the reasons stated in paragraphs 10-11 above. 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

18. BMKFA's primary position is that policy HWTC10 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 the Station should be retained unless an alternative site can be found that fulfils the requirements of BFRS. This is contrary to BMKFA's own position, but also contrary to WDC's own evidence. As such, the policy is unsound, as it is not justified by the evidence base.

19. In particular:

(1) The policy, and its supporting text, does not start with the presumption that the fire station will remain unless a suitable alternative site can be found. For example, paragraph 3.73 of the supporting text states that: "*it is the Council's objective to relocate the fire station to an alternative site within the town.*"

This is contrary to the "Implementing and Protecting" delivery scenario which the Background Paper states is WDC's preferred scenario, and which provides that the Station will only be moved if a suitable alternative can be found.

(2) The policy is contrary to WDC's own evidence that any alternative location for the Station must meet the requirements of BFRS (see, for example,

paragraph 6.6 of the Background Paper). The policy (i) merely refers to “*an alternative site*”, without reference to this site meeting the needs of BFRS, or any consideration of how this will be judged and (ii) refers to developers “*enabling provision*” of this site, without clarifying that the site must be identified, and the new station constructed, before the existing Station is closed (i.e. a turnkey agreement).

20. It is BMKFA’s position that, in order to be justified, the wording of policy HWTC10 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 policy 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 a reduction in response times from the alternative site, balanced against any potential benefits from relocation.
21. BMKFA is also concerned that it should not be required to bear any of the cost of re-location. The Background Paper identifies that the cost of relocating the Station is likely to be £5.1 million (paragraph 8.2), and that “*there has not yet been the opportunity to take firm funding decisions for the majority of the funding involved*” in the masterplan. Importantly, Table 14 of the Background Paper identifies a gap of £6.07 million in the funding of phase 2 of the masterplan, which includes the relocation of the Station.
22. 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 High Wycombe. 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.

23. Accordingly, BMKFA believes in order for policy HWTC10 to be sound a new paragraph should be added to the policy which provides as follows:

“The fire station will only be re-located from the site if 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.

24. 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 protect the Station should it remain

25. If the relocation of the Station is not possible, then policy HWTC10 may not be deliverable. This is for two main reasons: (i) the income generated by the sale would be lost, further increasing the funding gap for the redevelopment and (ii) the changes to the highway network may mean that an effective service cannot be delivered by the Station.

26. Turning first to the financial implications of the Station remaining, paragraph 6.8 of the Background Paper provides as follows:

“The retention of the fire station in situ or its relocation elsewhere will have both significant implications for the cost of delivering the masterplan plus the extent to which high quality comprehensive redevelopment of the Swan Frontage can take place. If the fire station is retained this will save approximately £5m. However it will limit the extent of redevelopment which can take place on the site, and thus reduce potential income towards the delivery of the masterplan

27. WDC has not demonstrated in its evidence base that the re-development of the Swan could proceed absent the relocation of the Station.
28. Further, as part of the policy HWTC1, there are proposals to change the road layout within the town centre. This includes restricting the Abbey Way flyover to one lane. This is the only means of access and egress for staff and response

appliances. A revised road layout could compromise the response time for on-call RDS staff, and therefore have a detrimental impact on response mobilising, given that they respond to the station from a remote location. BMKFA is concerned that the evidence-base to the Plan does not adequately demonstrate that the highway changes will not negatively impact upon BFRS' ability to deliver an effective service.

29. In particular, paragraph 6.7 of the Background Paper provides as follows (with added emphasis):

“If an alternative site is not found then a scenario may arise where the fire station remains in situ while changes are made to the highway network. BFRS have been consulted on these proposals and this scenario requires further analysis as to the impact of these changes.”

30. There is no evidence that this further analysis has taken place. Until it can be robustly demonstrated that the redevelopment of the Swan Frontage, and the changes to the highway network, will not limit BFRS' effectiveness, BMKFA believes that policy HWTC10 is unsound.
31. Further, in any event, in order to be sound, it is suggested that the policy should be amended to require any applications for redevelopment to demonstrate that the operation of the Station will not be compromised, and that BMKFA are to be consulted on any development in the vicinity of the Station.

APPENDIX 1

Site Ref.	Site Name	Source of Site	Location	Owner	Current Status	Size (ha)	Topography	Proximity to Road Network	Proximity to residential dwellings	Proximity to existing fire station	Community Profile	Other comments	Progress?
1	HWT/C20 Baker Street	DSA	Town Centre	Part WDC	Draft allocation for mixed use within DSA.	2.4 (would only use part)	Flat	Will have direct access to alternative A40 route when completed and access to A4128 North	Could be mitigated through redevelopment of site.	790m	Prominent on new route. Edge of centre site.	Proximity to junction would help with slowing traffic speeds. Deliverability high as in WDC own ship	
2	HWT/C17 Collins House/ Corner of Bridge St. / Desborough Rd and adjoining car park	Part of site from DSA	Town Centre	WDC	Draft allocation for mixed use within DSA.	0.2	Flat	Will have direct access to alternative A40 route when completed and close to A4128 North.	Mainly surrounded by retail and business uses.	580m	Good profile		
6	BNL Car Park - Queen Alexandra Road	DSA	Town Centre	BNL	Currently car park for BNL	0.24	Slight slope	Direct access onto the new A40 route when completed and close proximity to current A40 route.	Could be mitigated through the development of the site	300m	Concerns that site "tucked away". Although would be on main alternative route with new highway network.	Parking nos on site: c. 72. Maybe potential to displace these to the Swan theatre car park (310 spaces)	
7	Car park rear of Council Offices - Abbey Way	DSA	Town Centre	WDC	Car park for WDC offices	0.12	Flat	Direct access onto A40 Abbey Way	Surrounded by offices and law courts	270m	Prominent on new route. Good profile	Concerns around size of site. Potentially mitigated by design and access?	
9	British Legion club/Flyover	DSA	Town Centre		Site in use as a club for the Royal British Legion	0.15	Flat	Direct access to current A40 route and close proximity to the new A40 route.	Surrounded by retail and business use	25m	Central location. Good profile		
10	Desborough Road Car Park		Town Centre	WDC	Car Park	0.15	Flat	Direct access to new A40 route.	Mostly retail and business use. Some residential at rear.	610m	Prominent on new route.	Need to investigate potential to extend backwards into St. John Ambulance site / car park to give bigger site area	
17	Liys Walk - eastern edge of DSA site	DSA	Town Centre	National Grid	Part of current outline permission for retail and residential development. Reserved matters to be decided.	0.19	Sloping site - South to North (5 metre difference)	Will have direct access to alternative A40 route when completed.	Could be mitigated through the development of the site	290m	Prominent on new route	Would need to allow for emergency vehicles left and right turns in all directions	
18	Staples		Town Centre	Staples	Current retail use by Staples	0.45	Flat	Direct access to alternative A40 route when completed and also A404 South to M40 J4	No	109m	Prominent	WDC to give further consideration to existing value of site / ability to acquire site.	
5	Valley Warehouse and Rutland Street		Town Centre	WDC	Currently used as a car park and part of road network	0.23	Flat	Will have direct access to alternative A40 route when completed.	Mainly surrounded by retail and business uses. Residential properties to rear would be a concern - need to mitigate through design.	550m	Prominent on new route. Good profile		To be avoided if possible
11	Land at corner of Desborough Road and West End Road	DSA	Town Centre		Office and commercial storage facility	0.34	Flat	Direct access to new A40 route.	Residential dwellings at the rear of the site.	560m	Prominent on new route.		To be avoided if possible
16	Rutland Street, 1/1a Wendover Street and 34 Suffed Road		Town Centre	WDC	Currently residential and part of current road network	0.28	Sloping site - South to North (5 metre difference)	Will have direct access to alternative A40 route when completed.	Some residential dwellings to the South of the site	460m	Prominent on new route		To be avoided if possible
	Existing Fire Station		Town Centre			0.197		Direct access to current network and close proximity to new A40 route.	Surrounded by town centre uses	0	Prominent		

SITES NOT TO BE TAKEN FORWARD

Previous Site Ref.	New Site ref.	Site Name	Source of Site	Location	Owner	Current Status	Size (ha)	Topography	Proximity to Road Network	Proximity to residential dwellings	Proximity to existing fire station	Community Profile	Other comments	Progress?
V	3	HWTCT19 Bridge Street	DSA	Town Centre	Part WDC	Draft allocations for mixed use within DSA	0.55 (would only use part)	Flat	Potential for direct access on to existing A40 Oxford Road or close proximity to alternative A40 route when completed. Close to A4128 North.	Student accommodation to south-west.	610m	Good profile	Not widening carriageway/issues of buses Deliverability of ownership	
	4	Land to rear of Sainsbury's car park		Town Centre	WDC	Vacant site	0.18	Flat	Direct access onto A4128 and close proximity to A40	Many surrounded by retail and business uses.	600m	Good profile	Actway/Dovecot - difficulty of accessing North-East High Wycombe	
	8	Railway Place Car Park		Town Centre	WDC	Car Park	0.28	Slight slope	Direct access onto A40 London Road	Residential dwellings to the East and South West of the site	520m		Borderline of existing - one appliance at a time. Location - closer to Beaconsfield	
R	12	HWTCT15 Lily's Walk (Gas Works Site)	DSA	Town Centre	National Grid Ltd.	Current outline permission for retail and residential development. Reserved matters to be decided.	1.24	On steep gradient.	Will have direct access to alternative A40 route when completed.	Could be mitigated through redevelopment of site.	280m	Prominent on new route and central location	Commercial and Retail priorities for the site - high cost	
U	13	HWTCT11 Land off Duke Street	DSA	Town Centre	WDC	Allocated for mixed use. Would have to retain car park function on part.	0.68	Sloping site (10m difference)	Would need to travel along Tottenham Lane to access A404 Amersham Hill	Residential dwellings to east of site (opposite of Duke Street)	600m		Warmer to West side of town - closer to vulnerable areas (Castlefield etc) Road risk? 30 car park spaces required - best case Access to Fire Station - drill pad Close to bus stop for the bus Cher O'Brien - former MP Businesses. Has to be return to BFRS. Tangible benefit. Fire Authority members would make decision.	
W	14	HWTCT13 Wivombé General Hospital	DSA	Town Centre	NHS Trust	Site in operation. Potential consideration on site would render space available but not certain of timescales	6.7 (would considerably (north to south))	Site steeply up	Could potentially have direct access on to A404 Marlow Hill or Queen Alexandra Road (future alternative A40 route)	Residential dwellings to north-west	140m	Prominent on new route	Parts of site - prefer front of site onto Surfild Road/QAR.	
	15	Oxclagon Parade	DSA	Town Centre	Golden Apple	Recent closure of nightclubs	0.15	Flat	Direct access on to existing A40 Oxford Road or close proximity to alternative A40 route when completed.	Many surrounded by retail and business uses.	410m	Access difficult in practice, particular to A4128 and A404.	Network operation poor.	