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### **Devon and Somerset Fire and Rescue Service 'Safer Together' Consultation**

Dear colleagues,

In my capacity as County Councillor for Seaton and Colyton, I object to all the options in the consultation, and in particular to the closure of Colyton Fire Station, on the following grounds.

#### **INCREASED RISKS**

1. *On your own evidence, the proposals will leave the population of the Seaton and Colyton division, and many others across Devon and Somerset, facing increased life risk. On your own figures, overall the proposals will increase response times and therefore risks for many parts of the two counties, leaving 262,000 households (options 5 and 6) or 603,000 people (Devon average of 2.3 per household) at greater risk.*
2. *You say that the Fire Service must respond to the growth in population in certain areas, but you're proposing to cut stations in areas of rapidly growing population. You say that 'we need to assess where we are located in relation to this change in population size and shape'. Yet you refer mainly to new town developments, present no general analysis of population changes, and propose to close stations in areas like Colyton where population is undergoing sustained growth and there is repeated, ongoing development.*
3. *You recognise that the elderly are most at risk of house fires, but you're proposing to cut stations in areas with above-average proportions of vulnerable elderly people. You state 'we know that those aged over 85 have a much higher rate of fatal fires. In Devon and Somerset, it is predicted that the number of people aged over 85 will nearly double (43% increase) in the next ten years.' Yet you present no analysis of where population profiles are older and propose to close Colyton which is in an area with one of the oldest population profiles of anywhere in Devon and Somerset.*
4. *You are specifically increasing risk for rural areas, especially those furthest from conurbations. Colyton is surrounded by deep countryside with narrow lanes which are very confusing to outsiders (I confess to using satnav myself to get to some locations), and many thatched properties. 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. You are specifically adding to risk in deeper rural areas where access is most difficult.*
5. *You emphasise alternative first engines for areas covered by the threatened stations, but ignore the fact that you are removing the second engine for surrounding areas. As your*

own maps show, closing Colyton will increase risk for residents in Seaton and other communities in East Devon. Without the Colyton engine, no second engine will be able to reach a building fire in Seaton within the required time of 13 minutes.

6. *You claim that the stations to be closed are not significant for RTA concentrations, yet Colyton is close to the section of the A35 (Honiton to Charmouth) which Highways England considers the most dangerous* (although since it is not on Colyton ground it will not be included in your figures). You also state that the Service will devote more attention to preventing RTAs, but having been involved with HE's developing plans for improving road safety on this stretch of the A35, I have not seen any input from the Fire Service.
7. *You focus entirely on lives (which are obviously of paramount importance) but present no analysis of the implications of the changes for property (which is also very important to people).* The Fire Services Emergency Cover Toolkit would give you an expected figure for the increase in property damage costs, but this has not been used.
8. *You acknowledge that climate change means that flooding events will become more frequent and serious, but present no analysis of the implications of the proposals for these.* Since severe weather events increasingly cover larger areas, they can result in more emergency calls than they have fire engines available, so that calls then have to be prioritised and stacked. Any reduction in the number of fire engines will result in longer waits for fire engines to become available.
9. *You are proposing to destroy community assets and expertise which have been created over decades, even centuries.* Colyton Fire Station was first established by the local Chamber of Feoffees in 1641, centuries before the Devon and Somerset Fire and Rescue Service was created. Generations of local people have played their part in sustaining it.
10. *You say you cannot recruit and retain enough On-Call staff to crew all the existing engines, but in Colyton we have a team of trained firefighters, much of whose expertise and commitment will simply be lost if the station closes.* Despite Colyton not having enough firefighters to ensure 100% availability, the station has not been shown on your website as a station needing more firefighters since at least January 2019. None of the stations you propose to close have been shown, which suggests you wanted to ensure no new recruits came forward.

## **SUPERFICIAL TREATMENT OF PREVENTION**

11. *You make unsupported claims about the role of your existing prevention work in saving lives.* You refer to the reduction in fire deaths over time, but don't address the recent sharp increase in deaths in Devon. You claim that the longer-term reduction has been 'largely been due to two things: our work around fire prevention and protection, and changes in technology and habits.' Yet you present no evidence to show how your work has contributed to the changing pattern. You claim to be 'analysing the data', but where is the data on the relationship between prevention work and lives saved? Without this, it is plausible to believe that reductions are due mainly to the changes in technology and daily habits which you mention, rather than anything you have done.
12. *You claim that your risk modelling shows that the proposals will save lives, but it appears to be based on misleading assumptions.* It is based on comparing the future, for which assumes all the service's fire engines are available, with the current situation, which assumes several engines are not available, on the assumption that crewing and contract changes will ensure all appliances will be available in future. Since it is highly unlikely that will be achieved, the only honest and responsible method would be to compare current theoretical full availability with future theoretical full availability. On that basis, as analysis by Tony Morris has shown, there would be an increase in fire deaths as a result of the proposals. When I asked Lee Howell and Pete Bond to comment on this point at County Hall, they failed to answer.
13. *You don't present any serious proposals for increased prevention work.* You state 'we could increase our capacity for important prevention and protection work activity within our annual budget', but this is only a vague aspiration. You present no detailed financial or organisational proposals for improved prevention and protection work and no analysis of how they could improve the safety of life and property in fires, road accidents or flooding incidents. You present only 'potential' numbers of additional home fire safety visits and safety checks that could be delivered in return for closing stations, but no plans.
14. *In media interviews, you have you referred to additional fire alarms as the benefit of the station closures, but these could be achieved without them.* You don't say why reaching the 7 per cent of homes without alarms requires such a drastic programme of closures. Indeed it seems obvious that it could be achieved without closures. Such comments suggest that the talk about prevention is little more than a smokescreen (if that is an appropriate word) for your financial objectives.
15. *You ignore the potential role of retained firefighters in prevention work.* In your retained teams, you have a body of trained people who are knowledgeable about their local communities and could play a key role in educational work and achieving universal alarm installation. Stations could effectively become community safety centres.

16. *A serious analysis of current prevention work could show that even scaling it up dramatically might have limited impact.* The maps show that in many square kilometers in my division, less than 60 minutes prevention work has been carried out over the last 3 years, while even in the other squares only one or two hours work has been done. Since the shortest home fire safety visit requires on average 70 minutes, this means that virtually no work has been done in my area. Even one or two more visits would represent a big increase, but would they really make a significant difference? The idea is implausible.

## **FINANCIAL AIMS**

17. *You say you need to make significant financial savings, but you don't spell out the financial situation properly in the consultation documents.* The financial position must be clearly set out, with exactly how much has to be saved and how much is being reallocated. Hiding financial reasons behind pretended improvements to service risks your consultation being struck down as unlawful.
18. *You fail to disclose that most savings will come from the proceeds of selling the sites of the stations which will be closed.* Since the projected improvement in risks to life is flawed, the station closures represent little more than an asset sale. We are being asked to sell the family silver in return for a vague possibility of a cup of tea down the line.

## **A FLAWED CONSULTATION**

19. *Your consultation questionnaire is over-complicated and biased.* In particular, it does not provide a clear means for people to state their concerns about particular stations and communities. Many constituents have told me they couldn't fill in the form because they wanted to object to closing Colyton, but all the options included closing all the stations. You claim that this was approved by the Consultation Institute but I have written to them to complain.
20. *You acknowledge that 'Devon and Somerset local authorities' are affected by the proposals, but you have avoided detailed, public scrutiny by these authorities.* When the DCC Corporate Infrastructure and Regulatory Services Scrutiny Committee invited you to attend on 26th September, you declined on the grounds that the consultation closed four days earlier, although the 26th would have been before responses were analysed and long before the decision date in November. Instead, you attended a private masterclass for county councillors but failed to answer key questions. You refused invitations to East Devon and Teignbridge district councils.
21. *When Lee Howell stated at County Hall on 4th September that the Service had 'no obligation to consult with local authorities, only with the public, he misled councillors.* The Fire and Rescue national framework for England specifically says services must consult

with, 'the community, its workforce and representative bodies, **and partners**': local authorities are partners. The Civil Contingencies Act (CCA) requires them to co-operate 'with other local responders': district and county councils are responder organisations. Not consulting is not co-operating. The Crime and Disorder Act (CDA) also requires them to work alongside other responsible authorities, which includes local authorities. The impact of the cuts on CDA may be limited, but they will certainly impact on CCA responsibilities. CCA is all about resilience and the cuts will have a negative effect on their resilience.

## **CONCLUSION**

I do not believe that the Fire Authority can agree these proposals because they manifestly increase risk for my constituents and many others in Devon and Somerset, do not present a convincing case for improvement, and are based on grossly inadequate analysis and a deeply flawed consultation.

In particular, the closure of Colyton Fire Station will be profoundly detrimental to the area I represent. The Chair of the Fire Authority, Cllr Sarah Randall Johnson, will be able to testify, as Colyton's former County Councillor, to the validity of the claims about Colyton which I have made in this objection.

I call on my colleagues on the Devon and Somerset Fire and Rescue Authority to refuse to approve these proposals.

Martin Shaw  
16 September 2019