Oxfordshire FRS

Improving our fire and rescue service.

Consultation Analysis Final Report

(Qualitative Findings)

2 April 2026

Executive Summary

This report presents analysis of 1,230 responses to the public consultation on proposals to improve Oxfordshire Fire and Rescue Service. A mixed-methods approach combines quantitative analysis of closed questions with thematic analysis of open-text responses, enabling assessment of both overall patterns of opinion and the reasoning behind views on the proposals.

Overall Pattern of Responses

Across all proposals, responses were predominantly negative, with a high proportion of respondents expressing strong opposition.

For the Main Proposal, 65.6% of respondents expressed negative views (46.6% very negative), and 68.2% perceived a negative impact on Oxfordshire's communities (54.5% significant negative impact).

This pattern was consistent across Additional Proposals A–C, with Additional Proposal C (station closures) generating the strongest concern.

Key themes shaping responses

- **Service cover and response times:** Concerns that reduced local provision would increase reliance on more distant resources and result in slower or less reliable response times under real-world conditions.
- **Operational capacity and resilience:** Risks to backup capacity, flexibility and system resilience, particularly during concurrent incidents and peak demand.
- **Workforce sustainability:** Proposals seen as introducing new delivery risks linked to on-call availability, recruitment, retention and proposed crewing models.
- **Confidence in evidence and modelling:** Limited confidence in the evidence base, particularly use of averages and lack of clarity on how proposals would operate in practice.
- **Financial considerations:** Scepticism about whether efficiency savings justify potential impacts on service provision and long-term infrastructure.

Overall conclusion

There is a clear and consistent pattern of concern across the consultation, with responses predominantly negative across all proposals.

Support for the proposals is typically conditional, and depends on maintaining:

- effective local coverage
- reliable response times
- sufficient operational capacity and resilience

A central finding is that public confidence is closely linked to perceived impacts on safety and service reliability. Where these cannot be clearly demonstrated,

respondents indicate limited confidence in the proposals and call for greater clarity, evidence and reassurance to support decision-making.

Contents

1 INTRODUCTION

1.1 Overview

This report presents analysis of responses to the public consultation on proposals to improve Oxfordshire Fire and Rescue Service.

The consultation ran from 28 October 2025 to 31 January 2026. This included an extension from the original 12-week consultation period, which was scheduled to run until 20 January 2026.

The consultation invited feedback on proposed changes to the service's emergency response model.

A total of 1,230 submissions were received in response to the consultation. Responses included structured (closed) questions using Likert scales and open-text questions inviting qualitative comment.

1.2 Background

Oxfordshire County Council is responsible for the Fire and Rescue Service in the county, and based on a review of delivery of emergency response and community safety services launched the Consultation on proposals to improve Oxfordshire Fire and Rescue Service. The overall rationale for the consultation was:

- A significant shortage of on-call firefighter staffing hours. While on-call staff, who respond from home or work, remain vital, fewer people are able to commit due to changes in modern lifestyles.
- Recruitment is ongoing, but on-call firefighter numbers dropped 3% from 2014 to 2024, with total hours worked falling even more sharply.
- Over the past decade in Oxfordshire, full-time equivalent on-call firefighter numbers dropped by 36%, with staffing hours now as low as 20% of daytime needs.
- This means only about 5 out of 27 on-call fire engines may be available during peak times, resulting in slower response to high-risk incidents.
- Rapid urban growth further strains the current model and increases risks in areas distant from fire stations.

The proposals were split into three themes:

- **Effectiveness**: Changes that are designed to make us more effective.
- **Efficiency:** Changes that are designed to use our financial resources and our people differently to deliver improved services overall.
- I**nvestment**: Changes that are enabled by increasing the funding that the service receives.

The proposals consulted on were:

- **Main proposal – Creating five, day shift fire stations (theme: effectiveness)**
  Change how firefighters are deployed in the daytime by staffing five local stations during the day and relying more on on-call crews at night, aiming to improve daytime cover across

the county but with some reduction in overnight cover in Oxford. With the linked decision Wallingford station: either upgrade the current station or move it to a new site at Crowmarsh.

Additional proposals to deliver additional benefits on top of the main proposal.

A. **New station north of Oxford (theme: effectiveness):** Merge several Oxford-area facilities into one new modern station north of the city, replacing existing sites.
B. **Thame (theme: efficiency):** Remove one of Thame's two fire engines, keeping a single engine there.
C. **On-call station closures (theme: efficiency):** Close up to three on-call stations (Eynsham, Henley, Woodstock).
D. **Extra fire engine in Oxford (theme: investment):** Pay to keep an additional fire engine in Oxford available all the time, offsetting reductions in the main proposal.
E. **Keep firefighter numbers (theme: investment):** Pay to keep current firefighter numbers at each station, rather than reducing them.
F. **Keep station support officers (theme: investment):** Pay to keep station support staff who help manage and recruit on-call firefighters.

The analysis provided in this interim report covers feedback on the main proposal and Additional Proposals A to F.

1.3 Approach to analysis

A mixed-methods approach was used, combining:

- Quantitative analysis to understand the distribution of opinion
- Qualitative analysis to understand the reasoning behind responses

This approach ensures the findings reflect both what respondents think and why they think it.

1.3.1 Quantitative analysis

Responses to closed questions were analysed using descriptive statistics.

This provides an overview of the distribution of opinion across respondents, including:

- Levels of agreement and disagreement, and
- Levels of uncertainty (e.g. "not sure / don't know").

Percentages are based on valid responses and exclude respondents who did not provide an answer.

1.3.2 Qualitative analysis

All open-text responses were analysed using a thematic analysis approach.

- Responses were coded and grouped into key themes reflecting the main arguments, concerns, and suggestions raised by respondents.
- Each response was reviewed in full to ensure that both primary and secondary points were captured.

- Themes were developed iteratively and refined to ensure they accurately reflect the dataset.

Findings are presented thematically, supported by illustrative quotes from respondents.

1.3.3 Organisational responses

A small number of responses were submitted on behalf of organisations. These were analysed using the key themes.

Methodology for reviewing organisational submissions:

- All responses from unions, councils, organisations, residents and businesses provided to us were collated for review.
- Each response was examined individually and coded to identify recurring themes.
- A thematic analysis approach was used to categorise issues such as stations, workforce, modelling, and risk.
- Sentiment analysis was performed to gauge overall support or opposition.
- Key evidence and illustrative quotations were extracted to support the findings.
- Findings were cross-checked to ensure consistency across all submissions.
- A comparative analysis was conducted to identify differences in perspective between stakeholder groups and to ensure every viewpoint was included for consideration by decision makers.
- A structured narrative was developed that highlights areas of agreement, identifies potential risks, and clarifies points of divergence.

1.3.4 Interpreting the findings

The analysis is descriptive and evidence-based, aiming to reflect the range and nature of views expressed.

- Findings highlight the key themes and arguments raised by respondents.
- The analysis does not seek to weight responses or present statistically representative results.

1.4 Report Structure

Following this brief introduction, the remainder of this high-level report is set out as follows.

Section two:	Quantitative overview of responses
Section three:	Qualitative findings – Main Proposal
Section four:	Qualitative findings – Additional Proposal A
Section five:	Qualitative findings – Additional Proposal B
Section six:	Qualitative findings – Additional Proposal C
Section seven:	Stakeholder submissions to the consultation
Appendix A:	Respondent profile

Appendix B: Impact Assessment FBU campaign

2 QUANTITATIVE OVERVIEW OF RESPONSES

This section provides an overview of responses to the consultation's closed questions, including views and perceived impacts of the Main Proposal and Additional Proposals A–C, agreement with the reasons for change and the importance of potential investment options (proposals D –F).

2.1 Views and perceived impacts by proposal

This section presents responses to closed questions on views and perceived impacts for the Main Proposal and Additional Proposals A–C.

For each proposal, respondents were asked:

- "What are your views on this proposal?"
- "What impact, if any, will this proposal have on Oxfordshire's communities?"

2.1.1 Main Proposal

2.1.1.1 Views on the Main Proposal

A total of 1,175 valid responses were received (95.5% of all respondents), with a further 36 (2.9%) selecting 'not sure / don't know' and 19 (1.5%) not providing a response.

Views were predominantly negative, with **65.6%** of valid respondents reporting a negative view, including **46.6% r**eporting a very negative view.

23.8% of valid respondents reported positive views, while 10.7% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Very negative	547	46.6%
Fairly negative	223	19.0%
Neutral	126	10.7%
Fairly positive	157	13.4%
Very positive	122	10.4%
Total (valid)	**1,175**	**100.0%**

2.1.1.2 Perceived impact of the Main Proposal

A total of 1,151 valid responses were received (93.6% of all respondents), with a further 54 (4.4%) selecting 'not sure / don't know' and 25 (2.0%) not providing a response.

Perceived impacts were predominantly negative, with **68.2%** of valid respondents reporting a negative impact, including **54.5%** reporting a significant negative impact.

21.2% of valid respondents reported a positive impact, while 10.7% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Significant positive impact	102	8.9%
Somewhat positive impact	141	12.3%
Neutral	123	10.7%
Somewhat negative impact	158	13.7%
Significant negative impact	627	54.5%
Total (valid)	**1,151**	**100.0%**

2.1.2 Additional Proposal A

2.1.2.1 Views on Additional Proposal A

A total of 1,127 valid responses were received (91.7% of all respondents), with a further 78 (6.3%) selecting 'not sure / don't know' and 25 (2.0%) not providing a response.

Views were predominantly negative, with **57.2%** of valid respondents reporting a negative view, including **38.3%** reporting a very negative view.

22.1% of valid respondents reported positive views, while 20.6% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Very negative	432	38.3%
Fairly negative	213	18.9%
Neutral	232	20.6%
Fairly positive	138	12.2%
Very positive	112	9.9%
Total (valid)	**1,127**	**100.0%**

2.1.2.2 Perceived impact of Additional Proposal A

A total of 1,072 valid responses were received (87.2% of all respondents), with a further 107 (8.7%) selecting 'not sure / don't know' and 50 (4.1%) not providing a response.

Perceived impacts were predominantly negative, with **59.0%** of valid respondents reporting a negative impact, including **44.6%** reporting a significant negative impact.

22.3% of valid respondents reported a positive impact, while 18.8% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Significant positive impact	91	8.5%
Somewhat positive impact	148	13.8%
Neutral	201	18.8%
Somewhat negative impact	154	14.4%
Significant negative impact	478	44.6%
Total (valid)	**1,072**	**100.0%**

2.1.3 Additional Proposal B

2.1.3.1 Views on Additional Proposal B

A total of 1,081 valid responses were received (88.0% of all respondents), with a further 117 (9.5%) selecting 'not sure / don't know' and 32 (2.6%) not providing a response.

Views were predominantly negative, with **56.8%** of valid respondents reporting a negative view, including **41.9%** reporting a very negative view.

16.8% of valid respondents reported positive views, while 26.4% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Very negative	453	41.9%
Fairly negative	161	14.9%
Neutral	285	26.4%
Fairly positive	117	10.8%
Very positive	65	6.0%
Total (valid)	**1,081**	**100.0%**

2.1.3.2 Perceived impact of Additional Proposal B

A total of 1,020 valid responses were received (82.9% of all respondents), with a further 138 (11.2%) selecting 'not sure / don't know' and 72 (5.9%) not providing a response.

Perceived impacts were predominantly negative, with **60.7%** of valid respondents reporting a negative impact, including **44.2%** reporting a significant negative impact.

11.9% of valid respondents reported a positive impact, while 27.4% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Significant positive impact	39	3.8%
Somewhat positive impact	83	8.1%
Neutral	279	27.4%
Somewhat negative impact	168	16.5%
Significant negative impact	451	44.2%
Total (valid)	**1,020**	**100.0%**

2.1.4 Additional Proposal C

2.1.4.1 Views on Additional Proposal C

A total of 1,168 valid responses were received (95.0% of all respondents), with a further 42 (3.4%) selecting 'not sure / don't know' and 20 (1.6%) not providing a response.

Views were predominantly negative, with **78.4%** of valid respondents reporting a negative view, including **64.7%** reporting a very negative view.

9.8% of valid respondents reported positive views, while 11.8% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Very negative	756	64.7%
Fairly negative	160	13.7%
Neutral	138	11.8%
Fairly positive	71	6.1%
Very positive	43	3.7%
Total (valid)	**1,168**	**100.0%**

2.1.4.2 Perceived impact of the Additional Proposal C

A total of 1,129 valid responses were received (91.8% of all respondents), with a further 52 (4.2%) selecting 'not sure / don't know' and 49 (4.0%) not providing a response.

Perceived impacts were predominantly negative, with **79.5%** of valid respondents reporting a negative impact, including **64.2%** reporting a significant negative impact.

10.0% of valid respondents reported a positive impact, while 10.5% were neutral.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Significant positive impact	55	4.9%
Somewhat positive impact	58	5.1%
Neutral	118	10.5%
Somewhat negative impact	173	15.3%
Significant negative impact	725	64.2%
Total (valid)	**1,129**	**100.0%**

2.2 Agreement with the Reasons for Change

Respondents were asked to what extent they agreed or disagreed with the reasons for changing how emergency responses are delivered, as set out in the consultation document.

A total of 1,205 valid responses were received (98.0% of all respondents), with a further 12 (1.0%) selecting 'not sure / don't know' and 13 (1.1%) not providing a response.

Responses were predominantly negative, with **69.3%** of valid respondents expressing disagreement with the reasons for change, including **53.9%** expressing strong disagreement.

23.7% of valid respondents expressed agreement, while 7.1% neither agreed nor disagreed.

The distribution of responses is shown below.

Response option	Count	% of valid responses
Strongly agree	102	8.5%
Agree	183	15.2%
Neither agree nor disagree	85	7.1%
Disagree	185	15.4%

Strongly disagree	650	53.9%
Total (valid)	**1,205**	**100.0%**

2.3 Importance of Investment Proposals

Respondents were asked to rate how important it is that the council considers investing in each of the following proposals (Proposals D–F), on a scale from 1 (not important at all) to 10 (extremely important):

- D: Invest to keep an extra fire engine in Oxford 24/7
- E: Invest to keep current firefighter numbers at each station
- F: Invest to keep Station Support Officers

Responses were grouped into three bands: low (1–3), medium (4–7) and high (8–10). The distribution of responses is shown below.

Proposal	Low (1-3)	Medium (4-7)	High (8-10)	Total (valid)
D: Invest to keep an extra fire engine in Oxford 24/7	128 (11.1%)	256 (22.3%)	764 (**66.6%**)	1,148
E: Invest to keep current firefighter numbers at each station	53 (4.6%)	148 (12.8%)	956 (**82.6%**)	1,157
F: Invest to keep Station Support Officers	86 (7.5%)	273 (23.7%)	795 (**68.9%**)	1,154

Percentages are calculated based on valid responses for each proposal.

3 QUALITATIVE FINDINGS: MAIN PROPOSAL

This section presents the qualitative findings relating to the main proposal, exploring the reasoning, concerns and perceived impacts raised by respondents to the consultation.

3.1 Overview of responses

Analysis of responses to the main proposal indicates that views were predominantly negative, driven by concerns about how the proposal would operate in practice, particularly its impact on service coverage and workforce sustainability. These were consistently identified as key constraints on deliverability.

While some respondents supported the principle of aligning resources more closely with demand, this support was typically conditional on maintaining safe and reliable service provision. A recurring view was that patterns of risk should take precedence over demand when determining service provision.

Views were also shaped by differing interpretations of what constitutes an efficient and resilient fire and rescue service, alongside varying levels of confidence in the evidence and financial rationale underpinning the proposal.

3.2 Headline findings by theme

Six main themes were identified, which in summary were as follows:

Service cover and availability

This was the most prominent theme and a key driver of overall sentiment across responses. Views were primarily characterised by concerns that the proposal may redistribute rather than strengthen service capacity, improving daytime availability while creating gaps in night-time cover and local provision. This was frequently linked to reduced system resilience, greater reliance on distant resources and a perceived reduction in coverage.

Workforce sustainability, recruitment and retention

Impacts of the Main Proposal on the workforce were widely seen as a key constraint on deliverability, with concerns that 12-hour shifts and increased reliance on overnight on-call availability would be difficult to sustain in practice. Responses linked the model to risks around recruitment, retention, fatigue and the reliability of service provision, with workforce factors seen as affecting overall system resilience. A recurring view was that the proposal may exacerbate existing workforce challenges rather than resolve them.

Response times

Responses consistently raised concerns that the proposal may lead to longer and less reliable response times, particularly where local availability is reduced and reliance on more distant or on-call resources increases. These concerns were often grounded in real-world travel conditions and local geography, with delays seen as increasing risk to life and property in time-critical incidents.

Operational efficiency

Views on operational efficiency were mixed and reflected differing interpretations of what constitutes an effective service. While some supported better alignment of resources with demand, others argued that the proposal may reduce overall capacity and flexibility, particularly where underutilised resources are seen as providing essential backup and resilience. Overall, responses reflect a tension between maximising utilisation and maintaining system capacity.

Evidence base, modelling and consultation assumptions

Confidence in the evidence base was mixed. While some respondents viewed the proposal as data-driven, many questioned its real-world applicability, particularly the use of averages and reliance on historic data. Concerns focused on whether the modelling adequately reflects local conditions, incident severity and future risk, alongside calls for greater transparency and operational input.

Financial considerations

Financial arguments were widely contested. A dominant concern was that the proposal reflects cost reduction at the expense of service provision and public safety, with some questioning whether the scale of savings justifies the associated risks. A smaller number of responses supported the need to operate within financial constraints, viewing the proposal as a pragmatic reallocation of limited resources.

The sections below explore each theme in more detail, including the key issues raised and areas of agreement and divergence.

3.3 Service cover and availability

Responses addressed service coverage and availability under the proposed model, with sentiment predominantly negative. While some respondents expressed conditional support for increasing daytime cover, a dominant concern was that the proposal may redistribute existing pressures rather than strengthen overall system resilience, improving availability in some areas while creating new gaps elsewhere. This is reflected in concerns about reduced night-time cover, uneven local impacts and the redistribution of resources.

Across responses, views are shaped by a trade-off between improving daytime availability and maintaining overall service capacity. While some view the proposal as a more efficient distribution of resources, many interpret it as reducing provision in certain locations or times of day.

3.3.1 Night-time cover

Respondents raised strong concerns about fire service cover and availability during night-time hours under the proposed model. These respondents perceived the proposal would reduce overnight capacity and cause potential delays in response times, and often cited increases in risk to life and reduced confidence in service reliability. Some respondents view improvements to daytime availability as coming at the expense of overnight provision, which is considered an unacceptable trade-off.

Responses highlight night-time as a period of heightened risk, particularly in residential settings where occupants may be asleep and more vulnerable. While incident volumes may be lower, respondents emphasise that incidents can be more severe, with concerns that reduced availability may increase the risk of escalation before crews arrive. Some respondents also suggest that this level of risk may not be fully reflected in the modelling underpinning the proposal.

A further concern is the proposed reliance on on-call provision overnight, alongside reduced wholetime availability. This is seen as introducing greater uncertainty in response capability, particularly where on-call availability may be variable, raising concerns about the service's ability to respond effectively, including during concurrent incidents.

> *"Improved cover in the day should never be at the expense of emergency cover at night. ... At nighttime, people are not awake and alert. This delays people's response... often increasing the severity of the impact."*

3.3.2 Impacts on local service coverage

Responses raised concerns about the impact of the proposal on local service coverage. The redistribution of resources, relocation of firefighters and removal or relocation of fire engines are frequently interpreted as creating gaps in provision, particularly in areas currently served by existing stations affected by the proposal.

A central concern is that some communities may be located further from fire service provision, with reliance on more distant stations seen as affecting response times, availability and reliability. This redistribution is also associated with increased pressure on remaining stations, with concerns that neighbouring resources may become stretched or less available.

These concerns are illustrated through references to specific localities and risk contexts, including smaller towns and heritage areas already close to response time thresholds, key corridors such as the Thames Valley and M40, and areas of population growth such as the Eynsham and Witney corridor. Respondents also highlight potential impacts on cross-county

and motorway response, reduced availability of multiple appliances, and future housing and infrastructure pressures, with some suggesting that planned growth is likely to increase demand and place further strain on already stretched coverage over time.

> *"Great if you live in or near the five on-call stations. No benefit for those areas not, who then get a degraded service"*

3.3.3 Perception of diluting resources

A recurring view is that the proposal represents a net reduction or dilution of resources rather than a strengthening of provision. Respondents point to the removal of fire engines, stations, including the Rewley Road appliance, as evidence that resources are being redistributed rather than increased, resulting in coverage being spread more thinly. This is associated with reduced local capacity and increased pressure on remaining stations, particularly in areas such as Henley and parts of South and West Oxfordshire.

> *"Resources too thinly spread, increased risks to fire fighters' safety, residents and businesses in the county"*

3.3.4 Improvements to daytime availability and alignment with demand

A minority of responses within this theme expressed positive views, primarily because the proposal may improve daytime availability and better align resources with demand. This is seen as enabling a more efficient distribution of staffing and vehicles, with potential to improve response times and coverage. However, this support is typically conditional on ensuring that provision is not reduced elsewhere.

> "Better use of staffing and vehicles… available when most needed."

3.4 Workforce sustainability, recruitment and retention

Responses within this theme focus on the proposed working patterns and crewing model in the main proposal and the implications for the current workforce, including sustainability, availability and service resilience. Sentiment was predominantly negative, with workforce considerations frequently framed as a key constraint affecting the deliverability of the proposal in practice.

While some respondents acknowledged that the on-call model was becoming increasingly difficult to sustain, a central concern across responses was that the proposed 12-hour shift patterns and increased reliance on overnight on-call availability may place further strain on workforce stability and the reliability of the staffing model, rather than address underlying capacity challenges.

A minority of respondents expressed more positive views, typically linked to the potential for improved daytime coverage and more consistent staffing.

Across responses, views are shaped by a tension between improving daytime staffing levels and maintaining a workforce model that is sustainable, reliable, and deliverable in practice.

3.4.1 Compatibility of the proposed working patterns

Concerns about the proposed 12-hour day shifts were a prominent feature across responses. Respondents raised issues relating to fatigue, work–life balance, and the ability to manage childcare and family responsibilities alongside longer shifts. These working patterns were widely described as difficult to sustain, with potential implications for workforce wellbeing, morale and long-term workforce stability.

12-hour shifts were also linked to operational risk. Fatigue was described as increasing the risk of errors or accidents, raising concerns about firefighter safety and the effectiveness of emergency response.

These concerns were often framed more broadly as a disruption to established working lives. Respondents highlighted the impact of longer days, commuting time, and reduced flexibility, as well as difficulties balancing the role with family responsibilities and secondary employment.

Some responses also referenced previous experience of similar shift patterns, suggesting these had not been maintained in practice or had negatively affected morale. In this context, alternative models, such as the 2-2-4 system, were proposed as more compatible with workforce needs.

Taken together, these responses indicate that concerns about working patterns are closely linked to the long-term sustainability and safety of the workforce model.

> *"More WT coverage should be an improvement however... the 12-hour shifts for example, I would have missed a huge amount of my children's lives... it is likely that my wife would have had to give up work... This could have pulled my family apart."*

3.4.2 Impacts on recruitment, retention and morale

Another concern across responses was that the proposed model may adversely affect recruitment and retention through changes to working patterns and availability requirements that reduce the attractiveness and viability of the role.

Respondents frequently suggested that 12-hour shifts could make firefighter roles less attractive and lead to the loss of experienced staff, particularly where they are difficult to reconcile with family life or other commitments. In this context, some indicated that the changes could prompt existing staff to leave while discouraging new recruits from joining.

Responses also highlighted the potential impact on on-call availability, particularly in relation to overnight cover. Some suggested that individuals currently providing daytime availability

may be unwilling or unable to commit to night-time requirements, creating a risk of reduced availability and service cover.

A related concern was the practical and financial viability of remaining in the service. Some respondents indicated that restricting on-call participation primarily to night-time cover, or reducing daytime opportunities, could make the role less financially worthwhile or harder to combine with primary employment.

Across responses, these factors were also linked to morale, with some suggesting that the proposed changes may lead to feelings of being undervalued or adversely affected.

Taken together, these responses indicate that the proposal is perceived as having the potential to exacerbate existing recruitment and retention challenges, with direct implications for workforce stability.

> *"I am concerned that this will lead to many experienced and trained fire fighters leaving the service."*

3.4.3 Sustainability and resilience of the staffing model

Responses within this theme focus on whether the proposed staffing model would be reliable and sustainable in practice, particularly under conditions of variable availability and operational demand.

A central concern was that the model may not provide consistent cover across the full 24-hour period. This was frequently linked to the continued reliance on on-call firefighters overnight, combined with the potential reduction in daytime on-call availability. Respondents also highlighted the impact of sickness, competing commitments, or limited availability, suggesting that these factors could lead to gaps in coverage and reduced operational resilience.

Some responses questioned whether the model could weaken resilience by displacing existing daytime on-call contribution at stations where local crews are currently providing cover. In this view, guaranteed wholetime day cover may be achieved at the expense of reducing wider workforce participation and local resilience.

Concerns were also raised about operational capability. Some respondents suggested that changes to staffing patterns may reduce the availability of experienced wholetime firefighters, while others highlighted the risk of reduced exposure and potential skill fade within the on-call workforce.

Across responses, the proposal was described as redistributing existing workforce pressures rather than addressing underlying workforce constraints. While daytime coverage may improve, this was seen as potentially offset by increased fragility elsewhere in the system.

> *"You have stated that the appliances WILL be staffed overnight by the on-call crews but this is not a certainty. The only certainty is you will drop guaranteed fire appliance*

availability through the night with the hope that the on call are either able or willing to crew."

3.4.4 Improvements to service reliability and alignment with demand

A minority of responses expressed support for the proposed model, particularly where it was seen as improving consistency and aligning staffing more closely with periods of higher demand.

Some respondents suggested that aspects of the on-call system are increasingly difficult to sustain, and that greater reliance on wholetime staffing could provide a more stable and predictable approach. Others highlighted potential benefits in terms of improved availability, consistency, and operational capability.

> "This proposal will increase the immediately available fire engines during the day… this provides certainty with availability in contrast with on-call fire engines where availability cannot always be guaranteed."

3.4.5 Need for greater clarity on proposed crewing arrangements and further engagement

A cross-cutting issue across responses was a perceived lack of clarity around how the proposed crewing arrangements would operate in practice. Respondents also called for further engagement with firefighters and representative bodies, emphasising the importance of drawing on frontline operational experience.

> *"There does not appear to have been consultation with staff already delivering the service… the proposals will mean significant changes to people's working lives…"*

Taken together, these responses indicate that workforce sustainability is viewed as a key determinant of the proposal's deliverability, particularly in terms of its ability to provide consistent and resilient service cover.

3.5 Response times

Responses within this theme focus on the impact of the proposal on response times. Sentiment was predominantly negative, with concerns driven primarily by the perception that response times would increase under the proposed model. These concerns were closely linked to perceived changes in service coverage, including increased travel distances, reduced local availability and greater reliance on more distant stations for some areas. A smaller number of respondents expressed more positive views, typically where the proposal was seen as improving daytime availability and increasing firefighter availability on station during periods of higher demand.

3.5.1 Impact of reduced local provision on response times

Responses consistently suggest that the proposal is likely to lead to longer response times, particularly where local fire engines are removed or relocated. Increased reliance on more distant stations was seen as increasing travel time, with respondents emphasising that even small increases in attendance time could have significant consequences in time-critical incidents.

In many responses, these concerns were framed in terms of direct risks to life and property, with respondents emphasising that delays in response could result in incidents escalating before crews are able to intervene.

> *"Having local fire stations spread across the county ensures more households and commercial properties are close to emergency services should they need fast help. The proposed changes will slow the response times for locations that currently have fire stations."*

3.5.2 Night-time mobilisation delays and increased response risk

Concerns about response times were particularly pronounced in relation to night-time incidents. Respondents frequently highlighted that the proposed model increases reliance on on-call firefighters overnight, which was seen as introducing an additional mobilisation delay, as on-call crews must travel to the station before responding.

These concerns were compounded by the view that incidents occurring at night may be detected later, potentially allowing fires to develop further before emergency services are contacted. In this context, delays in response were seen as having more severe consequences, particularly for more remote communities.

> *"Most night time incidents are likely to have a great impact since people may not be aware of a fire until it has taken quite a hold. Therefore, the fire engines need to be at the fire very quickly. Night on-call crews increases the delay and, therefore, potentially the impact."*

3.5.3 Place-based concerns and real-world travel conditions

Concerns about response times were frequently grounded in specific local contexts. Many responses focused on edge-of-county areas, particularly Henley, where respondents questioned whether alternative stations could provide timely cover given the distances involved. In these areas, response times under the proposal were often described as reaching unacceptable levels.

Some responses highlighted potential impacts within Oxford, where the removal of the fire engine from Rewley road was seen as reducing immediate availability and increasing reliance on standby movements.

Across both urban and rural contexts, respondents also raised concerns about real-world travel conditions, including traffic, roadworks, network layout, and future growth in population and vehicle use. These factors were frequently cited as reasons why modelled response times may not reflect operational reality, particularly under variable or peak conditions.

> *"Henley on Thames is situated in the far corner of the county. The nearest county fire station would be in Wallingford - a good 20 minutes away by the time the crew has assembled and prepared the tender - even with blue lights."*

3.5.4 Improvements in response times through increased on-station availability

A smaller number of respondents expressed confidence that the proposal could improve response times, particularly during the day. These responses often emphasised the benefit of having firefighters already on station, reducing mobilisation time and enabling a more immediate response in areas of higher demand.

However, these views were typically conditional on the proposal being delivered without reducing overall service coverage or creating new risks in other parts of the system.

> "I believe this would improve response times if firefighters are already on site..."

3.6 Operational efficiency

Responses within this theme focus on the proposal in terms of operational efficiency and the effective use of resources. Views were mixed, reflecting differing interpretations of what constitutes an efficient and resilient fire and rescue service.

3.6.1 Efficiency through alignment with demand

Some respondents supported the proposal on the basis that it represents a more efficient allocation of existing capacity, particularly where it would reduce reliance on uncrewed appliances and ensure that fire engines are available during periods of higher demand. In these responses, aligning staffing with incident patterns was seen as a more practical, predictable and sustainable use of limited resources. Some respondents also framed this support in terms of limitations within the current system, which was described as inefficient or increasingly difficult to sustain in practice.

> *"Staffing levels for on call are extremely low and it seems wasteful to have engines and buildings which cannot be used for most of the day and significant chunks of the evening."*

3.6.2 Redistribution of resources rather than increased capacity

However, other responses questioned whether the proposal would deliver a genuine improvement in efficiency. A recurring theme was that any gains may reflect a redistribution of resources rather than an overall increase in capability, particularly where changes reduce available capacity or shift provision away from certain locations.

Some respondents suggested that while the proposal may address specific inefficiencies, particularly in daytime cover, it may introduce new challenges elsewhere in the system.

> *"I can see what they're trying to fix, but this feels like shuffling risk around, not actually reducing it. Yes, daytime cover is a problem. But fixing that by removing engines elsewhere and thinning night cover creates new gaps"*

3.6.3 Role of reserve capacity in supporting system resilience

A key point of divergence related to how unused or underutilised resources were interpreted. While some respondents viewed uncrewed appliances as inefficient, others emphasised their role as reserve capacity, particularly in maintaining flexibility and supporting wider system functioning.

Overall, views on efficiency differed depending on whether it was understood in terms of maximising utilisation or maintaining sufficient capacity across the system.

> *"An uncrewed fire engine during the day is no fire engine."*

3.7 Evidence base, modelling and consultation assumptions

Responses within this theme focus on how respondents interpreted and trusted the evidence underpinning the proposal, including the modelling, assumptions and wider consultation framing. Views were mixed, reflecting differing levels of confidence in the evidence presented. While some respondents accepted the evidence presented and viewed the proposal as data-driven, others expressed scepticism about the assumptions, completeness, and real-world applicability of the analysis. This divergence in confidence strongly influenced the extent to which respondents felt able to support the proposal.

3.7.1 Concerns about assumptions, completeness and real-world applicability

Respondents questioned the assumptions, completeness and real-world applicability of the evidence base. Concerns frequently focused on the use of averages, particularly in relation to response times, with respondents arguing that county-wide figures did not reflect local geography, committed-pump scenarios, or how incidents unfold in practice. Others questioned whether the analysis adequately accounted for factors such as night-time on-call

reliability, cross-border activity, incident concurrency and the wider implications of reallocating resources across the system.

Some responses also suggested that the consultation material was framed too selectively, with concerns that evidence had been presented in a way that supported a predetermined conclusion or did not fully set out alternative interpretations, trade-offs, or contentious aspects of the proposals.

> "While I recognise the need to improve daytime cover, the modelling relies too heavily on countywide averages and does not address specific locality risks, especially at night when the risk of fatalities and severe incidents is higher."

3.7.2 Frequency, severity and future risk in modelling assumptions

A recurring theme across responses was that the evidence appeared to focus more heavily on the number of incidents than on their scale, severity or consequences. Respondents questioned whether lower-frequency but higher-severity incidents, particularly at night, had been given sufficient weight in the analysis. This included concerns that fires, RTCs and other serious incidents may be less common outside the daytime period but potentially more dangerous and resource intensive.

A related concern was that the modelling was seen as overly dependent on historic data and did not sufficiently account for future changes in risk and demand. Respondents referred to housing growth, population change, business development, congestion, major events, and emerging environmental risks as factors that may alter future demand and challenge conclusions based primarily on past incident patterns.

> "Your data relates to numbers of incidents. Have you considered and demonstrated the scale and impact of the incidents?"

3.7.3 Need for greater transparency and more localised evidence

Across responses, there were consistent calls for greater transparency and more detailed supporting evidence. Respondents requested more localised analysis, including clearer breakdowns of response times, incident patterns and workforce availability, as well as greater clarity on the assumptions underpinning the modelling. Some also called for additional scenario testing, particularly in relation to night-time cover, simultaneous incidents, Oxford impacts, edge-of-county communities and cross-border support.

In several responses, the credibility of the evidence was linked to the extent to which it was informed by operational knowledge, with respondents arguing that firefighter, representative, and local stakeholder input was necessary to test the realism of the modelling.

> "Without postcode-level modelling or call-handling data, the overall effect on resilience is uncertain."

3.7.4 Mixed confidence in the evidence base

Some respondents expressed confidence in the evidence presented, viewing the proposal as grounded in incident data and aligned with current patterns of demand and availability. In these responses, the proposal was often seen as a rational response to a genuine problem, particularly where the current model was described as increasingly difficult to sustain. In some cases, however, this support remained cautious or conditional, with respondents accepting the underlying diagnosis of low daytime availability while questioning whether the specific design of the proposal had not yet been sufficiently evidenced.

> *"I am fairly positive about this proposal because it directly addresses what appears to be the most significant weakness in the current model... That said, my support is cautious... it will be important that the assumptions underpinning the modelling are kept under review once implemented."*

3.8 Financial considerations

Responses within this theme focus on how the financial rationale underpinning the proposal was interpreted.

3.8.1 Prioritisation of cost over safety

A concern across responses was that financial considerations were being prioritised over service quality and public safety. The proposal was frequently characterised as a form of cost-cutting, with respondents questioning whether reducing resources, including stations and staffing, could be justified where it could increase risk to communities. These concerns were often framed in strong terms, emphasising that financial savings should not come at the expense of life safety.

> "Our safety must never come at the cost of budget cuts."

3.8.2 Value for money and scale of savings

Some respondents questioned whether the financial case for the proposal was sufficiently compelling. The scale of potential savings was described as limited relative to the risks and impacts, with suggestions that the changes may not represent good value for money.

> "The savings seem minimal relative to the costs and disruption"

3.8.3 Financial realism and operating constraints

Some respondents supported the proposal as a pragmatic response to financial constraints, viewing it as a reasonable way of improving service provision within the existing cost envelope.

> "This seems a good way to increase daytime fire cover within the current cost envelope of the service."

3.9 Impacts on Oxfordshire's communities

3.9.1 Increased risk to life and property from greater distance to emergency resources

Responses suggest that the proposal could lead to slower emergency response for some communities, particularly where reliance on more distant resources is required. This is seen as increasing the risk of incidents escalating before crews arrive, with potential consequences for life, injury and property damage.

3.9.2 Increased vulnerability at night due to reduced response certainty

A recurring concern was that communities may be more vulnerable at night, when incidents may be more severe and response capacity less certain under the proposal, particularly where reliance on on-call availability may introduce additional delays to response.

3.9.3 Uneven distribution of service impacts across Oxfordshire

Responses suggest that impacts would not be evenly distributed, with some communities experiencing improved service while others, particularly in more rural or edge-of-county areas, may face reduced coverage. This was described as creating unequal levels of protection across the county.

3.9.4 Reduced sense of local safety and reassurance

The loss or reduction of local fire service presence is seen by some as diminishing community reassurance and visibility. Some respondents suggest this could increase anxiety, particularly among more vulnerable groups.

3.9.5 Impacts of workforce instability and service reliability

Concerns about staffing changes are linked to potential impacts on service reliability, with respondents suggesting that workforce instability, particularly in relation to availability and retention, could reduce the consistency and effectiveness of emergency response for communities.

3.10 Suggestions to lessen impacts on Oxfordshire's communities

3.10.1 Maintain local provision and avoid reductions in coverage

Responses emphasised maintaining existing fire stations, appliances and local presence, particularly in areas most affected. This includes retaining specific stations or resources to support local response capability.

3.10.2 Increase staffing capacity to maintain or enhance coverage

Some responses propose increasing staffing levels as a way to mitigate impacts, particularly through recruiting additional wholetime firefighters or supporting more consistent 24/7 cover. These suggestions are framed as a way of supporting response capability across the system.

3.10.3 Strengthen recruitment and retention of on-call firefighters

A common suggestion is to address workforce challenges by improving recruitment and retention of on-call firefighters. Suggestions include enhanced incentives, pay, employer engagement, and more flexible working arrangements, with the aim of improving availability.

3.10.4 Increase funding and investment in the fire service

Some respondents suggest that impacts could be mitigated through increased financial investment, either from local or central government. This includes funding to support staffing, maintain infrastructure, and support overall service capacity.

3.10.5 Adopt phased, flexible or alternative implementation approaches

Some responses propose modifying how changes are implemented, including phasing proposals over time, piloting new models, or exploring alternative crewing and deployment approaches. These are framed as ways to test assumptions and reduce potential unintended impacts.

4 QUALITATIVE FINDINGS: ADDITIONAL PROPOSAL A

This section presents the qualitative findings relating to Additional Proposal A, exploring the reasoning, concerns and perceived impacts raised by respondents.

4.1 Overview of responses

Responses to Additional Proposal A were primarily driven by concerns about how the proposed consolidation of Kidlington and Rewley Road would affect local coverage, operational capacity and workforce sustainability.

A central tension across responses was between the potential strategic benefits of a more centralised, modern facility and the perceived risks of reducing distributed coverage and locally based resources.

While a minority of respondents supported the proposal in principle, this support was typically conditional on maintaining overall service capacity, specialist capability and effective response across the county.

Across responses, there was a consistent pattern of conditional support, with respondents indicating that changes would be acceptable only where they did not lead to increased response times, reduced local coverage or loss of specialist capability.

Some respondents also indicated that they were unable to fully assess the proposal due to limited detail provided, particularly in relation to the proposed location, operational arrangements and the assumptions underpinning modelling.

4.2 Headline findings by theme

Six main themes were identified, which in summary were as follows:

Impacts of consolidation on coverage and geographical risk

This was a central theme across responses and focused on the implications of combining Kidlington and Rewley Road fire stations into a single fire station to the north of Oxford. Responses were primarily characterised by concerns that consolidation and relocation may reduce distributed coverage, weaken local resilience and increase geographic risk, particularly in Oxford, surrounding towns and villages and parts of South Oxfordshire. While some respondents supported the strategic logic of a north Oxford location, this was typically conditional on maintaining overall service provision and avoiding gaps in coverage.

Response times

Responses to this theme were primarily driven by concerns that relocating resources away from existing stations may increase response times, particularly in Oxford city centre and communities surrounding Oxford. These concerns were closely linked to congestion, travel distances and the importance of proximity to high-risk areas, with many respondents emphasising that even small delays may have significant operational consequences.

Perceived reduction in capacity and risks to operational resilience

A prominent theme across responses was whether the proposal would strengthen or reduce overall operational capacity. Responses were often characterised by the view that consolidation may reduce available resources and weaken resilience, particularly if it results in fewer appliances or the loss of specialist capability. Concerns were especially pronounced in relation to the future of the Rescue Tender based in Kidlington and whether its expertise could be effectively replicated if dispersed.

Workforce sustainability, recruitment and retention

Responses in this theme focused on the practical and organisational effects of the proposal on firefighters, particularly those based at Kidlington. Concerns centred on loss of accommodation, the accessibility of a new location, and the potential implications for morale, retention and on-call availability. While a smaller number of respondents noted possible benefits from improved facilities and access, views were predominantly shaped by concern about workforce disruption and reduced stability.

Evidence base, modelling and consultation assumptions

A recurring issue across responses was whether the evidence base was sufficiently detailed and robust to support the proposal. Responses frequently highlighted limited clarity on the proposed location, operational arrangements, and specialist provision, alongside concerns that the modelling may not fully reflect real-world conditions such as traffic, geography and future demand. Some respondents indicated that this lack of detail made the proposal difficult to assess with confidence.

Financial considerations

Responses in this theme focused on whether the financial case for the proposal was justified and whether investment would be better directed towards existing services. A prominent concern was that the proposal may involve high upfront costs without clear operational benefit, with some respondents viewing it as financially driven or linked to asset sales. A smaller number supported the proposal on efficiency grounds, though this was generally conditional on clear evidence of service improvement and long-term value.

The following sections explore each theme, including the key issues raised, areas of agreement and divergence and perceived impacts.

4.3 Impacts of consolidation on coverage and geographical risk

Responses in this theme focused on the proposed consolidation of Kidlington and Rewley Road stations and the implications of moving from a distributed to a more centralised configuration of service provision.

Existing stations were discussed in terms of the roles they play within both local areas and the wider operational network and how these functions may be affected by the proposed model.

4.3.1 Loss of coverage and increased geographic risk

A central concern was that consolidating Kidlington and Rewley Road would reduce local coverage by replacing two established stations with a single site. Respondents frequently challenged the framing of the proposal as a combination of resources, instead viewing it as a net reduction in provision, with fewer locally based appliances available to respond to incidents.

Many respondents linked these concerns to increased travel distances and gaps in coverage between key areas. Kidlington was described as providing strategic “in-between” coverage between Oxford and surrounding towns and villages and its removal was seen as creating gaps between locations such as Oxford and Witney or Banbury.

Overall, respondents suggested that longer travel distances, combined with population growth and development, may reduce the effectiveness of response. A recurring view was that service provision should expand alongside demand, with some respondents supporting new infrastructure only where it supplements rather than replaces existing capacity.

> *“Removing two stations into one is removing available stations.”*

4.3.2 City centre risk and access constraints

Some responses raised concerns about maintaining effective service coverage within central Oxford, particularly given its high-risk characteristics and perceived access constraints.

Respondents highlighted the city's historic built environment, high population density and concentration of activity as factors increasing both the likelihood and potential severity of incidents.

Some responses also emphasised the role of the Rewley Road site in providing immediate, locally based response to the city centre. Its location was described as critical for enabling rapid response within an area that is difficult to reach from outside. In this context, relocating provision away from a central location was seen as increasing reliance on appliances travelling into Oxford from surrounding areas.

This was linked to concerns about congestion and limited access routes, including pressures on roads such as the A40. A recurring view was that these constraints may delay response in time-critical incidents where appliances must enter the city from outside.

> *"Oxford is a very historic city with many students and old buildings with fire and traffic hazards. Traffic can be gridlocked – this risks lives not having a city centre-based engine."*

4.3.3 Impact of centralisation on network coverage and local resilience

Responses raised concerns that consolidating stations may reduce the flexibility and resilience of the wider network. The current distributed configuration was seen as enabling localised capacity and backup, with stations performing complementary roles across different areas of the county.

A concern was that a single-site configuration may limit the ability to respond to concurrent or geographically dispersed incidents, particularly where resources are already committed elsewhere. This was seen as reducing availability and flexibility across the system.

Some responses also questioned whether the proposed configuration would fully replace existing operational capability, particularly where changes to appliances, crewing or specialist provision may result in fewer resources being available.

Concerns were also raised about night-time resilience, particularly where relocation may reduce the availability of on-call staff or make attendance more difficult.

> *"If Kidlington closes and the North Station pump is dealing with an incident, Oxford cover is very much depleted."*

4.3.4 Perceived north-south imbalance in service provision

Some responses highlighted that the proposal may reduce effective coverage for parts of the county, particularly in South Oxfordshire, rural areas and outlying towns. Respondents questioned whether a north Oxford location would provide adequate and timely response for these communities.

Locations such as Henley, Shiplake, Thame and Banbury were referenced, with concerns that resources may be redistributed towards the north, leaving other areas less well served.

> *"Another example of Oxfordshire council funding being spent in the north of the county at the expense of residents in the south."*

4.3.5 Strategic location and improved access across the county

A minority of responses supported the proposed north Oxford location, particularly where it was seen as offering a more strategic position within the road network. Improved access to routes such as the A34, A40 and ring road was seen as enabling faster movement across the county and more efficient coordination of resources.

Some respondents also noted that the current Rewley Road site is increasingly constrained, and that relocation could improve operational efficiency and working conditions through a purpose-built facility.

Supportive responses also reflected a view that risk and demand are increasingly located outside the city centre, particularly along major road networks and areas of housing growth.

However, this support was typically conditional on maintaining sufficient operational capacity and not reducing overall service provision.

> *"This allows us to adapt to the reality of where we attend the majority of incidents, make better use of our resources with a better road network and create a fit for purpose response model."*

4.4 Response times

Responses in this theme focused on how changes to station configuration may affect response times across Oxford and the wider county. In particular, respondents considered how relocating resources and increasing distances between stations and communities may influence the speed and reliability of emergency response.

4.4.1 Response times in Oxford

Responses raised concerns that relocating resources away from Rewley Road may increase response times within Oxford, particularly in the city centre. While some respondents suggested that a north Oxford location could improve average response times at a county-wide level, many emphasised the importance of proximity to areas of concentrated risk within the city.

In this context, Rewley Road was seen as providing immediate access to high-risk areas, including locations with high population density, historic buildings, and student accommodation. Its relocation was therefore understood as increasing the distance appliances must travel to reach incidents within the city.

These concerns were closely linked to access constraints, with respondents highlighting congestion, complex road layouts, and planned transport changes as factors that may delay appliances travelling into Oxford. A recurring view was that even small increases in response times could be operationally significant, particularly in time-critical incidents.

> *"You will reduce coverage and increase response times to central Oxford, with its high population density and significant numbers of historic buildings."*

4.4.2 Response times in areas surrounding Oxford

Responses also raised concerns about the potential impact on response times for areas surrounding Oxford. A central issue was that consolidating stations may increase distances between appliances and the communities they serve, particularly where locally based stations are removed.

Concerns were often framed in relation to specific locations, including Kidlington and Henley, where respondents anticipated reduced local coverage and longer travel distances. In this context, locally based stations were seen as enabling shorter and more reliable response times.

A recurring view was that increasing the distance between stations and communities may reduce the timeliness and reliability of response, particularly where resources are required to travel further or where availability is already constrained.

> *"Amalgamating resources moves them further from their current localities, which would negatively impact response times."*

4.5 Perceived reduction in capacity and risks to operational resilience

Responses in this theme focused on how the proposal may affect the overall level of operational capacity available, the retention of specialist capability and the extent to which any new configuration would strengthen or weaken service resilience.

While some respondents recognised potential benefits in modernising infrastructure and improving the efficiency of the estate, this support was typically conditional on maintaining or enhancing overall capacity and specialist capability, rather than reducing them.

4.5.1 Perceived reduction in operational capacity and resource availability

A recurring concern was that the proposal may result in a net reduction in operational capacity, particularly in relation to the number of appliances and overall resource availability. Respondents frequently challenged the framing of the proposal as a combination of stations, suggesting instead that it represents a reduction in resources, including the removal of fire

engines and changes to crewing arrangements, potentially limiting the availability of resources to respond to incidents.

> *"...combining the stations would mean bringing all the resources into one location, however this is a removal of resources ... and not a combination."*

4.5.2 Loss of specialist capability and expertise

Responses raised strong concerns about the removal of specialist resources, particularly the Rescue Tender and associated crews at Kidlington. A central issue was the potential loss of an integrated, multi-skilled capability, combining specialist equipment with experienced personnel trained to operate across a range of complex incidents. This capability was often described as playing a critical role in certain incident types and not easily replaced once lost.

Some respondents questioned whether the Rescue Tender's capability could be replicated through the redistribution of equipment or skills across other appliances. A recurring view was that dispersal would dilute expertise and reduce the effectiveness of response, particularly where coordinated, team-based specialist intervention is required.

> *"I would refer to my earlier response which focused on the benefits of the Specialist Rescue Team/Tender with a concern that this resource could be lost if these specific changes occurred. There is a depth of experience and capability in this resource and, as highlighted, the loss of it would have a significant impact on those who need their broad range of interventions."*

4.5.3 Modernisation of infrastructure and more efficient use of resources

Some responses supported the proposal where it was seen as an opportunity to modernise infrastructure and improve the efficiency of the estate. Existing sites were described as outdated, constrained, or no longer fit for purpose, with references to ageing buildings, limitations of the Rewley Road site, and underused space within current headquarters. In this context, a new, purpose-built facility was seen as better aligned with current operational requirements, enabling improved facilities, enhanced training provision, and infrastructure better suited to contemporary firefighting practices and emerging risks.

Some respondents also supported the consolidation of functions into a single site, with co-location of headquarters, operational crews and specialist resources seen as enabling improved coordination and more efficient use of investment. However, this support was typically conditional on consolidation delivering genuine operational improvements and not resulting in a reduction in overall resources or service capacity, particularly in relation to specialist provision.

> *"It's about time we invest in our stations, making them future proof... Current stations do not meet the needs for a fire service in this day."*

4.6 Workforce sustainability, recruitment and retention

Responses identified a range of concerns relating to the workforce impacts of the proposed consolidation of Kidlington and Rewley Road into a new station. These centred on the practical implications for firefighters, particularly those based at Kidlington, including the loss of accommodation and the accessibility of a new site, alongside broader impacts on workforce stability, morale and retention.

4.6.1 Workforce displacement and loss of accommodation

A prominent concern across responses was the impact of the proposal on firefighters based at Kidlington, particularly the loss of tied accommodation and relocation. Responses frequently described the proposal as displacing staff from their homes, with some highlighting that a substantial number of firefighters may be affected.

Responses highlighted the potential for significant personal and financial impacts, including disruption to family life and challenges securing alternative accommodation locally. In some cases, it was suggested that these impacts may affect the ability of firefighters to remain in role.

A recurring concern was the lack of clarity on how these impacts would be managed, particularly in relation to replacement accommodation or financial support.

> *"Having to uproot to a new station would mean losing their homes and enormous upheaval for their families. Where would they live?"*

4.6.2 Accessibility of new location and on-call availability

Some responses raised concerns about the practicality of the proposed station location in relation to access for existing crews and the viability of on-call provision. These responses suggested that increased distance to the site, or characteristics of the surrounding area, may make it more difficult for on-call firefighters to attend the station, particularly at night.

This was linked to concerns that the proposal may reduce the availability of on-call personnel to crew appliances, particularly where existing staff may no longer live or work within a viable response radius.

> *"Position wise it makes sense, but the availability of nighttime crew is unrealistic."*

4.6.3 Morale, wellbeing and workforce retention

Some responses raised concerns about the potential impact of the proposal on staff morale and wellbeing, particularly in relation to relocation and perceived lack of support. These responses suggested that such changes may reduce goodwill and negatively affect morale.

In a number of cases, this was linked to perceived risks around workforce retention, with some respondents questioning whether affected firefighters may choose to leave the service. A smaller number of responses also raised potential implications for recruitment, particularly where changes to location or working arrangements may affect the attractiveness of roles or the viability of on-call provision.

> *"Forcing staff out of their homes will not be forgiven, you will lose goodwill and morale will suffer at a time when you need to make significant changes"*

4.6.4 Perceived benefits of improved location and facilities

A smaller number of responses highlighted potential benefits of a new station location, including improved access to major routes and reduced commuting challenges compared to existing sites. In some cases, respondents suggested that a modern, consolidated facility could have positive impacts on staff experience and morale.

> *"A station set up in the North Oxford area could be better for travel arrangements for FF, greater access to trunk roads for response and a new updated work place for staff."*

4.7 Evidence base, modelling and consultation assumptions

Responses raised a range of concerns about the evidence and rationale underpinning the proposal, particularly in relation to the level of detail provided and the extent to which the proposal reflects operational realities. Across responses, there was a recurring perception that the evidence base was not sufficiently detailed or robust to support a clear assessment of the proposal's impacts

4.7.1 Lack of detail and clarity on proposal design and delivery

A recurring concern across responses was the limited detail provided on the design and delivery of the proposal, with some respondents indicating that this constrained their ability to provide informed feedback.

This was particularly evident in relation to the proposed location of the new station and how it would operate in practice. Respondents highlighted that the absence of a confirmed site made it difficult to assess the robustness of modelling, including projected response times and service impacts. This was often linked to a lack of clarity on key design and operational details, including station location, appliance provision, crewing arrangements and the configuration of specialist resources.

Further concerns related to how specific elements of the proposal, including the future of the Rescue Tender function, would be implemented.

> *"How are we expected to provide feedback on a proposal with no information?"*

4.7.2 Concerns about the robustness and realism of modelling and assumptions

A recurring concern across responses was whether the modelling and assumptions underpinning the proposal are realistic and reflective of real-world conditions. Responses questioned whether the evidence adequately accounts for factors such as traffic, road layout, geography and the practical realities of emergency response.

Some respondents also raised concerns about the use of averages and historic data, suggesting these may mask local variation, fail to reflect current and future risk, and understate the potential impact of changes. In this context, several responses characterised the modelling as incomplete, outdated, or overly simplified, with some questioning its credibility as a basis for decision-making.

A related concern was that significant changes to service provision are being proposed on the basis of modelling perceived as uncertain or speculative, particularly where key assumptions and inputs are not fully evidenced.

A smaller number of responses viewed the available metrics as broadly supportive of the proposal but highlighted the need for more detailed scenario testing, including under peak traffic conditions and future demand.

> *"I think it's a grave error to make major changes on speculative modelling."*

4.7.3 Perceived gaps in evidence and stakeholder input

Some responses raised concerns about whether the proposal is sufficiently grounded in evidence, with a perception that it relies heavily on modelling without supporting real-world data or demonstrated outcomes.

A related concern was the extent to which the views and experience of operational staff have informed the proposal. Some respondents questioned whether firefighters and those with direct knowledge of service delivery had been adequately consulted, suggesting that this input is essential to understanding how changes would operate in practice.

Some responses also highlighted a perceived lack of evidence on how the proposal would affect workforce arrangements in practice, including the potential impact on availability, retention and day-to-day operations.

> *"Have you asked the Fire Service what their opinion is?"*

4.7.4 Conditional support based on evidence

A smaller number of responses expressed support for the proposal based on the available evidence, suggesting that the data indicates a broadly positive approach.

However, this support was typically conditional on seeing further testing results, particularly modelling of response times in peak traffic situations, including rush hour and major events.

> *"The metrics suggest this is a sensible proposal, but it would be important to see modelling of response times in peak traffic situations such as if the new football stadium is built at the Triangle, when Blenheim events are on, and during peak rush hour."*

4.8 Financial considerations

Responses in this theme focused on the cost of the proposal, how investment should be prioritised and the strength of the financial case underpinning the changes.

Across responses, there was a recurring concern that the proposal represents a significant level of expenditure, with questions about whether this is justified, and whether resources would be better directed towards maintaining or strengthening existing services.

While some respondents perceived the proposal to be financially driven, particularly in relation to asset sales, a smaller number expressed conditional support where it was seen as improving efficiency and delivering longer-term value.

4.8.1 Perceived high cost and poor value for money

A prominent concern across responses was that the proposal would involve substantial capital expenditure, particularly in relation to the construction of a new station and associated facilities. Responses frequently described the proposal as expensive or unnecessary, with some questioning whether the scale of investment is proportionate to the anticipated benefits.

In this context, some respondents questioned whether the proposal would deliver sufficient benefit to justify the level of upfront cost.

> *"Sounds expensive and not sure the case has been made for why this is needed."*

4.8.2 Preference for reinvestment in existing services and resources

A recurring view across responses was that available funding would be better directed towards maintaining or improving existing services, rather than investing in new infrastructure.

Responses emphasised prioritising investment in frontline capacity, including retaining fire engines, maintaining station coverage, improving existing facilities and supporting staffing and crew availability, including recruitment and retention. These responses often suggested that

such investment would represent a more effective use of resources than developing a new facility.

> *"If you have money to spend on this, you have money to spend on improving current services"*

4.8.3 Uncertainty around funding and financial assumptions

Some responses raised concerns about how the proposal would be funded and whether the financial assumptions underpinning it are realistic.

Respondents questioned the source and availability of funding, including whether sufficient capital would be available to deliver the proposal without impacting day-to-day service provision. In some cases, responses also raised concerns about the overall affordability and practical deliverability of the proposal.

A smaller number of responses questioned whether cost assumptions adequately reflect local land values and site constraints, particularly in higher-cost areas.

> *"Where would the money come from to build new station and HQ? There would be no money coming in until old sites successfully sold off, so how much would a bank loan cost?"*

4.8.4 Perceived role of asset sales in shaping the proposal (Rewley Road site)

Some responses suggested that the proposal may be driven by financial considerations, particularly in relation to the potential sale of the Rewley Road site. In this context, respondents questioned whether the release of valuable land in a central location was influencing the rationale for these changes.

> *"It feels more like it is being pushed from the Council to vacate prime real-estate land within Oxford City Centre that if sold will never be brought back into use for the fire service."*

4.8.5 Conditional support based on efficiency and long-term savings

A smaller number of responses expressed support for the proposal where it was seen as enabling more efficient use of resources, particularly through the consolidation of sites and functions.

In these cases, respondents highlighted potential benefits such as co-locating headquarters and operational facilities and reducing ongoing costs through improved infrastructure and training provision, including, in some cases, the potential to release funds from existing sites.

However, this support was typically conditional, with respondents emphasising the need for clear evidence that these changes would deliver tangible benefits to service delivery and would not adversely affect operational capacity.

> *"Based on the context and reasoning provided this sounds like an important and significant change. The combination of HQ in a fire station could potentially save costs."*

4.9 Impact on Oxfordshire's communities

4.9.1 Increased risk to life and property due to slower response times

The most consistently identified impact across responses is the potential for longer response times across parts of Oxfordshire, particularly in Oxford city centre, southern areas and rural communities.

This is frequently linked to greater risk to life, more severe fires, and increased property damage, with respondents emphasising that even small delays can have significant consequences in time-critical emergencies. Concerns are often amplified by references to traffic congestion, longer travel distances, and reduced local coverage.

4.9.2 Loss of specialist rescue capability and increased risk in complex incidents

A prominent concern across responses is the potential removal or dilution of specialist rescue capability currently based at Kidlington, particularly the Rescue Tender.

Respondents highlight that this capability is critical for serious road traffic collisions, water rescue, and complex incidents, and argue that redistributing equipment or skills would not replicate the effectiveness of a dedicated, experienced team. This is seen as increasing the risk of slower or less effective interventions in high-impact emergencies.

4.9.3 Uneven impacts across communities, with some areas experiencing reduced protection

Some responses described the proposal as creating unequal outcomes across the county, with some areas benefiting while others experienced reduced service.

In particular, southern Oxfordshire, Henley, and rural communities are frequently identified as being at risk of slower response times and reduced coverage, leading to concerns about fairness and equitable access to emergency services.

4.9.4 Reduced overall fire cover and system resilience

Responses raised concerns that the proposal could reduce overall fire cover and system resilience, particularly through the consolidation of stations and removal of appliances.

This is seen as weakening the service's ability to respond to multiple or concurrent incidents, increasing reliance on more distant crews and creating potential gaps in availability.

4.9.5 Negative impacts on firefighters and their families affecting service delivery

A significant number of responses highlighted impacts on firefighters and their families, particularly in relation to loss of housing, changes to working arrangements and reduced morale.

These impacts were frequently linked to concerns about staff retention, loss of experience, and reduced workforce stability, with respondents arguing that this could ultimately affect the quality, reliability and availability of emergency response for communities.

4.10 Suggestions to lessen impacts on Oxfordshire's communities

4.10.1 Maintain existing fire stations or a strong local operational presence

The most common suggestion across responses is to retain existing fire stations, particularly Rewley Road and Kidlington, or maintain a reduced but operational presence in key locations such as Oxford city centre.

Respondents frequently argue that maintaining distributed coverage is essential to avoid gaps in response, particularly in high-risk or high-demand areas. Where full retention is not supported, suggestions often include smaller stations, satellite units, or retaining at least one appliance locally to preserve rapid response capability.

4.10.2 Only proceed if response times are demonstrably equal to or better than current levels

A large number of responses emphasise that any changes should only proceed if response times are proven to be equal to or better than current levels.

This is often linked to calls for more transparent, detailed, and realistic modelling, including accounting for traffic, future development and real-world conditions. Respondents frequently suggest testing or phasing changes before full implementation to ensure impacts are understood and do not increase risk.

4.10.3 Retain specialist rescue capability and expertise

Many responses stress the importance of maintaining the specialist rescue function at Kidlington, particularly the Rescue Tender and its dedicated crew.

This capability is seen as critical to managing complex and high-risk incidents, and respondents frequently argue that distributing equipment alone would not replicate the effectiveness of a skilled, centralised team. Retention of this capability is framed as essential to maintaining service quality and public safety.

4.10.4 Prioritise investment in existing infrastructure and local capacity

A prominent theme across responses is that impacts could be reduced by investing in current stations, workforce and on-call capacity rather than closing or merging sites.

Suggestions include improving recruitment and retention, increasing staffing levels, enhancing existing facilities and redirecting potential funding from new builds into strengthening current provision.

4.10.5 Mitigate impacts on firefighters to maintain workforce stability

Many responses highlight the need to actively support firefighters affected by the proposal, particularly in relation to housing, relocation, and changes to working arrangements.

Suggestions include retaining or replacing tied housing, offering financial support or compensation and engaging staff in planning decisions. Respondents frequently link workforce stability to community outcomes, arguing that supporting staff is essential to maintaining experienced crews and consistent emergency response.

5 QUALITATIVE FINDINGS: ADDITIONAL PROPOSAL B

This section presents the qualitative findings relating to Additional Proposal B, exploring the reasoning, concerns and perceived impacts raised by respondents.

5.1 Overview of responses

Responses to Additional Proposal B were primarily driven by concerns about the removal of the second fire engine in Thame, particularly in relation to local capacity, system resilience and the potential impact on Thame and surrounding areas.

A central theme was the role of the second appliance as a source of backup capacity and operational flexibility, particularly where the primary appliance is already deployed. Concerns were frequently linked to Thame's local and strategic context, including major transport routes, cross-border reliance, population growth and increasing traffic.

A cross-cutting issue was whether the proposal's evidence base and modelling adequately reflect how the second appliance is used in practice, particularly under conditions of concurrent demand and variable availability.

A minority of respondents expressed support for the proposal on efficiency and financial grounds, particularly where the second appliance was described as underutilised or difficult to crew. This support was typically conditional on maintaining effective service coverage and response performance.

5.2 Headline findings by theme

Six main themes were identified, which in summary were as follows:

Operational resilience and local risk in Thame

This was a central theme across responses and focused on the role of the second appliance in maintaining local resilience and continuity of cover. Responses were primarily characterised by concern that its removal may reduce backup capacity, limit response to simultaneous or escalating incidents and increase reliance on more distant resources. These concerns were closely linked to Thame's wide catchment, major transport routes and cross-border reliance. While some respondents viewed the appliance as underused, it was more commonly seen as a critical resilience asset supporting system stability under variable demand.

Response times

Responses were primarily driven by concern that removing the second appliance may increase response times, particularly where the primary appliance is already deployed. These concerns were linked to distance, geography and the limits of average response-time modelling, which was seen as masking delays in time-critical or concurrent incidents. A recurring view was that the proposal may reduce the reliability and consistency of response for Thame and

surrounding communities. A smaller number of respondents suggested impacts may be limited where neighbouring cover is sufficient.

Operational efficiency and use of resources at Thame

A prominent theme was differing views on how efficiency should be defined. Some respondents described the second appliance as underutilised and supported removal where resources could be redeployed to higher-demand areas. However, a more common view was that it contributes to efficiency by maintaining continuity of cover, reducing standby movements and supporting response when the primary appliance is unavailable. Overall, responses reflected a tension between efficiency as utilisation and efficiency as maintaining sufficient capacity and resilience.

Evidence base, modelling and consultation assumptions

Responses focused on whether the evidence base was sufficiently robust to support removal. A recurring concern was that reliance on averages and historic data may not reflect real-world conditions, particularly concurrent demand, cross-border pressures and future risk. Some respondents also questioned the transparency and completeness of the evidence. While a smaller number viewed the data as supportive, many indicated that the current evidence does not provide sufficient confidence in the proposal's local impact.

Workforce sustainability, recruitment and retention

Responses recognised workforce availability as a key constraint, particularly within the on-call model. Some accepted that removal may be necessary where the appliance cannot be reliably crewed. However, responses were more commonly characterised by the view that staffing challenges should be addressed through recruitment, retention and alternative crewing models rather than reducing capacity. In this context, low usage was often seen as a consequence of workforce issues rather than lack of need.

Financial considerations

Responses reflected differing views on the financial case for removal. Some supported the proposal on cost-effectiveness grounds, particularly where the appliance was seen as underutilised. However, a recurring concern was that savings may be limited relative to the potential loss of resilience and operational capacity. Many responses emphasised that financial efficiency should not come at the expense of service provision or community safety.

The following sections explore each theme, including the key issues raised, areas of agreement and divergence and perceived impacts.

5.3 Operational resilience and local Risk in Thame

Responses within this theme focus on the role of the second fire engine as a source of local resilience, providing immediate back-up capacity, operational flexibility and the ability to respond to multiple or complex incidents in Thame and surrounding areas.

Respondents frequently linked this role to Thame's local and strategic risk profile, including major transport routes, cross-border activity and a wide rural catchment. In this context, the second appliance was often viewed not as a high-frequency resource, but as a critical resilience asset, particularly in situations where incidents overlap, escalate, or occur under high-demand conditions.

5.3.1 Role of the second appliance in maintaining local cover and system stability

Respondents highlighted the role of the second appliance in maintaining local response capability when the primary appliance is deployed. This was linked to the frequency of mobilisation within Thame and surrounding areas, with concerns that removing the second appliance could leave no immediate local cover and increase reliance on more distant resources.

A related theme was the role of the second appliance in supporting wider system stability. Some responses suggested it may reduce the need for standby moves, helping to maintain availability across neighbouring stations and limiting the redistribution of resources across the network. In this context, the second appliance was viewed as contributing to continuity of cover both locally and across the wider system.

> *"Removing any fire engine has a negative impact. Let's look at what happens now. As soon as there is no truck available in Thame a standby truck gets sent to cover the area. Taking the second truck instead of helping recruit causes you to have to send a standby truck more frequently and taking that truck away from its own area."*

5.3.2 Simultaneous incidents and surge capacity around Thame

Responses emphasised the role of the second appliance in enabling the service to respond to simultaneous incidents and periods of increased demand. Respondents described scenarios in which the primary appliance is already committed, leaving no local resource available to respond to a second incident.

This was linked to wider system pressures affecting Thame, including demand associated with major routes such as the M40. Some respondents referred to recent incidents where both appliances were deployed, suggesting that concurrent demand is not uncommon.

In this context, removing the second appliance was seen as reducing the service's ability to respond to multiple incidents, increasing reliance on appliances attending from further afield, and limiting operational effectiveness at larger or more complex incidents where multiple appliances are required to ensure safe and effective operations. The second appliance was

also described as providing resilience during maintenance, breakdown, or periods of high demand.

> *"Emergency planning should be built around what happens on the worst days, not what happens on an average day, especially when incidents can overlap or escalate quickly. This is also a real concern for rural communities, where response times are already longer and less predictable due to distance and road networks. Taking away local back-up increases the chance that support will have to come from further afield, making delays more likely just when rapid reinforcement is most needed."*

5.3.3 Wider network and cross-border resilience

Some responses highlighted the role of the second appliance at Thame within a wider, networked fire service system, particularly in relation to cross-border working and mutual aid. Respondents described Thame as both supporting and relying on neighbouring services.

Thame was described as contributing to coverage for surrounding areas, including nearby towns and villages, major transport routes such as the M40 and stations with lower availability. Some responses also raised concerns about pressures affecting neighbouring services in Buckinghamshire, including proposed changes to station provision in locations such as Haddenham and Stokenchurch.

In this context, removing the second appliance was seen as potentially reducing Thame's ability to support cross-border incidents while increasing reliance on neighbouring services that may themselves have limited availability. Some responses suggested that reductions in capacity across both areas could weaken mutual aid arrangements and overall network resilience.

> *"We are relying on support from our neighbouring counties who are also going through periods of change and cuts, facing the same challenges as us. Can we not work with them to find a solution?"*

5.3.4 Local resilience, back-up capacity and future demand in Thame

Responses emphasised the importance of planning for future demand and evolving risk, rather than relying solely on current activity levels. The second appliance was frequently described as providing reserve or contingency capacity within a changing risk environment.

Respondents referenced population growth, increased traffic and Thame's wide catchment area, including surrounding rural communities and major routes such as the M40. These factors were seen as contributing to both increased incident risk and greater demand on local resources. Some responses also highlighted emerging risks, including extreme weather, environmental pressures and new development.

A recurring theme across responses was that emergency planning should be based on potential peak demand and worst-case scenarios, rather than average levels of activity. In this context, spare or contingency capacity was seen as having a protective value, even where

usage is infrequent. The second appliance was therefore viewed as providing resilience against unpredictable, high-impact incidents not captured in current demand modelling.

Some responses also questioned whether the proposal appropriately balances cost savings against future risk, suggesting that removing capacity now may reduce the service's ability to respond effectively to changing conditions over time.

"Having more capacity than needed is crucial for the unknown. With new homes, buildings & the huge increase in vehicles on the road especially electric that have batteries that have many fires this cut is a backward step"

Overall, responses suggest that the second appliance is primarily understood as a resilience asset, valued for its role in maintaining local cover, supporting response to complex or concurrent incidents, and providing capacity within a growing and strategically exposed area.

5.4 Response times

Responses within this theme are driven by concerns about the loss of immediate local backup capacity following the removal of the second appliance at Thame, and the implications this may have for the speed, reliability and consistency of emergency response.

Across responses, the second appliance is commonly described as providing secondary response capacity and supporting operational resilience, particularly in scenarios where the primary appliance is already deployed. Its removal is therefore associated with increased reliance on resources travelling from further afield, with potential implications for attendance times, response under concurrent demand, and overall operational flexibility across the local area and wider network.

5.4.1 Potential for increased response times

Responses suggest that removing the second appliance would increase response times, particularly where incidents are attended by resources travelling from neighbouring stations. Greater travel distances were seen as a key driver of delay, especially in a geographically wide catchment area and along major routes such as the M40.

A recurring concern was that, where no local appliance is available, subsequent incidents may experience longer wait times before a crew can attend. This was frequently linked to scenarios in which the primary appliance is already deployed, leaving no immediate local response capability. Some responses also suggested that demand would be redistributed rather than reduced, meaning incidents currently attended locally may require response from further afield.

Some respondents also highlighted that delays may be more pronounced at certain times, including overnight or during periods of higher demand, where resource availability may be more constrained.

More broadly, some respondents expressed the view that reducing the total number of appliances within the system would inevitably lead to increased response times, regardless of redistribution or modelling assumptions.

"If one engine is already out and another job comes in an engine would need to come in from Oxford a travel time of 20 minutes. Could be the difference between life and death."

5.4.2 Perceived limitations of response-time modelling

Respondents frequently questioned the use of average response times as a measure of impact, suggesting that averages may not reflect the variability and urgency of real emergency situations. Comments emphasised that individual incidents, particularly those involving risk to life, require immediate response and may not be fully represented through overall averages.

Some responses expressed concern that modelling assumptions may understate potential delays, particularly where factors such as traffic, geography and resource availability are not fully accounted for. A further theme was that localised impacts in and around Thame may not be visible within wider county-level averages, leading to a perception that the scale of impact may be understated.

Some responses also suggested that reliance on average response times may obscure worst-case scenarios, particularly where multiple incidents occur or local resources are unavailable.

"I strongly disagree with your analysis that the main negative impact will be a two second delay of response time. This does not take into account situations where two engines are needed simultaneously..."

5.4.3 Existing response times and service performance

Respondents referred to existing response times, suggesting that they are already longer than expected and could worsen if capacity is reduced. In several cases, respondents compared current performance to national averages and expressed concern that existing response times are already below expected standards.

These longer response times were frequently associated with increased risk to life, greater property damage, and reduced effectiveness of emergency response, particularly in time-critical or high-risk incidents.

"Even with two appliances response times are significantly above the national average: removal of one appliance cannot result in an improvement, and therefore population safety compromised."

5.4.4 View suggesting limited impact on response times

A smaller number of responses suggested that the proposal may have limited impact on response times, particularly where alternative provision from neighbouring stations is sufficient to maintain overall coverage.

"Although cutting a fire engine is always a difficult thing to do, if response times are not affected and other appliances can be used as a second appliance to Thame then this is a consideration"

5.5 Operational efficiency and use of resources at Thame

Responses within this theme focus on how operational efficiency is understood in the context of removing the second appliance at Thame.

A central tension across responses was whether efficiency is best defined in terms of resource utilisation and cost-effectiveness, or in terms of maintaining sufficient capacity to support stable and flexible system performance, particularly under variable or concurrent demand.

Views were frequently conditional, with support for removal typically dependent on whether alternative arrangements can maintain response performance, service levels and overall system resilience.

5.5.1 Perceived efficiency gains from reallocating the second appliance

Some responses describe the second appliance as a low-utilisation resource, with limited mobilisation and inconsistent crewing cited as indicators that it may not represent an efficient use of resources.

Respondents adopting this view often emphasise the benefits of reallocating or redeploying the appliance, or associated resources, to areas of higher demand where they may deliver greater operational value. In some cases, this includes suggestions that the appliance could be relocated, replaced with a different type of vehicle or otherwise used more effectively elsewhere in the system.

A related view is that concentrating available staff on a single, reliably crewed appliance may represent a more efficient model of provision, particularly where maintaining two appliances reduces overall availability.

Some responses also express confidence that a single appliance at Thame, supported by neighbouring stations or wholetime crews, would be sufficient to maintain service coverage without materially affecting response performance.

> *"An underutilised resource being reallocated elsewhere where it will get used more fits with the theme of improved efficiency."*

5.5.2 Efficiency of retaining the second appliance within the system

Other responses argue that the second appliance contributes to overall system efficiency by supporting continuity of cover and reducing the need for standby moves or reactive redistribution of resources.

In this view, the appliance plays an important role beyond direct mobilisation, helping to maintain availability across neighbouring stations and limiting disruption across the wider network. Its value is also linked to providing additional capacity where the primary appliance is already committed, particularly in more complex or resource-intensive incidents.

A smaller number of responses suggest that lower utilisation may reflect current crewing or deployment practices, rather than lack of need and that the appliance could represent a more efficient asset if used more effectively.

> *"Second fire engines play an important role in larger or more complex incidents, providing depth, flexibility, and resilience..."*

5.5.3 Conditional views on efficiency and availability

A proportion of responses adopt a conditional position, linking efficiency to both utilisation and deliverability. Retention is more often supported where the appliance can be reliably crewed and is seen to contribute to operational effectiveness. Conversely, removal is seen as more justifiable where availability constraints limit its practical use, particularly where resources can be redeployed without negatively affecting response times, service levels or overall system resilience.

> *"From an efficiency perspective, it is understandable to question the value of maintaining a second engine that is infrequently mobilised... However, second fire engines play an important role in larger or more complex incidents, providing depth, flexibility, and resilience..."*

5.6 Evidence, modelling and consultation assumptions

Responses within this theme focus on the robustness of the evidence used to justify removing the second appliance at Thame, including the data presented and the modelling approach.

A central issue across responses was whether the evidence used is sufficient to reflect how a second appliance is used in practice, particularly in scenarios involving concurrent demand or reliance on more distant resources.

5.6.1 Reliance on averages and limited local visibility of impact

A recurring concern was the reliance on average response-time modelling to assess the impact of the proposal. Several responses questioned whether small, modelled differences are realistic when considered against actual travel distances between Thame and neighbouring stations. Responses also suggested that averages may obscure the **localised impact** of removing a second appliance, particularly where the primary appliance is already deployed or a second response is required quickly. Some responses further noted that averages do not reflect the urgency of time-critical incidents.

> *"Your modelling says that a 2nd engine response would only be 2 seconds later... Please tell me how a 2nd engine... can get from Wallingford, Crowmarsh or Wheatley... only 2 seconds slower than from Thame... I think you need to look at your modelling methodology because it looks flawed to me."*

5.6.2 Concerns about modelling assumptions and operational realism

Concerns were also raised about whether the modelling reflects real-world operational conditions. Several responses suggested that the analysis may not fully capture concurrent incidents, escalation or periods where neighbouring resources are unavailable. Some respondents also indicated that the consultation does not provide sufficient detail on how the second appliance is used in practice or how alternative cover would operate, leading to calls for more scenario-based analysis.

> *"I strongly disagree with your analysis that the main negative impact will be a two second delay of response time. This does not take into account situations where two engines are needed simultaneously..."*

5.6.3 Data quality, completeness and transparency

Responses raised concerns about the quality and clarity of the data presented. Some responses highlighted the use of approximate figures and questioned whether all relevant activity, including standby moves, is captured. Others questioned whether the data period is representative, particularly where COVID-affected years may distort demand. Further concerns related to transparency, with calls for clearer explanation of how data has been constructed and interpreted.

> *"I would also need to see how many times the appliance was actually mobilised, including to cover moves, etc as it is not just actual incidents attended that count."*

5.6.4 Cross-border demand and mutual aid not clearly reflected

Responses raised concerns about whether the evidence sufficiently reflects cross-border demand and mutual aid. Several responses questioned whether incidents across county boundaries and pressures on neighbouring services have been fully accounted for, particularly given Thame's proximity to Buckinghamshire.

> *"I don't see an adverse impact here but do the calculations take into account deployment in or out of Oxfordshire by Buckinghamshire FRS?"*

5.6.5 Lack of forward-looking evidence

Responses raised concerns that the proposal relies on historic data, without sufficient consideration of future demand and risk. Several responses highlighted housing growth, increasing traffic and environmental pressures as factors that may increase demand over time.

> *"The county's population continues to grow, you need to take that into account ... historical data doesn't account for that."*

5.6.6 Views supporting the use of evidence

A smaller number of responses indicated that the evidence supports the proposal, highlighting low levels of mobilisation and expressing confidence that overall coverage would be maintained.

"The statistics don't lie - difficult to justify keeping two engines."

5.7 Workforce sustainability, recruitment and retention

Responses within this theme engage directly with workforce and the challenges of the on-call model, as a key constraint affecting the viability of the second appliance at Thame. Across responses, there is broad recognition of this challenge, but differing views on whether removal of the appliance represents an appropriate or effective response.

5.7.1 Recognition of crewing constraints

Responses acknowledge the difficulty of consistently crewing the second appliance, particularly during daytime periods. These responses reference low availability, reliance on overtime, and wider challenges associated with the on-call model. In this context, some respondents state that, where the appliance cannot be reliably crewed, its removal may be a pragmatic or necessary decision.

"If you have not got the crew then I understand why you would remove it."

5.7.2 Address workforce issues rather than remove capacity

A contrasting view across responses is that, while workforce availability is a recognised issue, removing the second appliance does not address the underlying problem. Instead, respondents argue that low usage is primarily a consequence of staffing constraints, rather than lack of operational need.

These responses emphasise the importance of improving recruitment, retention and support for on-call firefighters, suggesting that workforce challenges should be addressed through investment and reform rather than by reducing operational capacity.

"The problem is on-call staff. Improve that before removing resources."

5.7.3 Workforce impact: morale, retention and long-term viability

Some responses raise concerns about the potential impact of removing the second appliance on workforce sustainability. These include perceived risks to morale, retention and engagement among on-call firefighters, as well as the potential weakening of team structures within the station.

A number of responses also reference experiences at other stations, suggesting that removal of appliances may contribute to declining availability over time and affect the longer-term viability of remaining resources.

"You're just going to lose more on-call firefighters."

5.7.4 Alternative workforce and crewing approaches

Some responses propose alternative approaches to addressing workforce constraints, rather than removing the appliance. These include introducing day-crewed or wholetime models, improving recruitment strategies and making more flexible use of existing crews.

Some responses also suggest that the second appliance could be better utilised if workforce issues were addressed, indicating that the current level of use may not fully reflect its potential value within the system.

"An uncrewed fire engine is a problem, but crewing is the main problem, improve the retention and recruitment of on call fire fighters."

5.8 Financial considerations

Responses raised differing views on the financial case for removing the second appliance at Thame, particularly in relation to value for money, the scale of potential savings and the balance between cost efficiency and maintaining service provision.

A central tension across responses was whether the appliance represents an inefficient use of limited resources due to relatively low utilisation, or whether its removal would deliver only limited financial benefit while reducing operational capacity.

5.8.1 Lack of cost-effectiveness of the secondary appliance

Responses suggested that retaining a second appliance with relatively low levels of mobilisation represents an inefficient use of financial and staffing resources. These responses referenced the ongoing costs associated with maintaining, crewing and equipping the appliance, alongside its perceived limited use and questioned whether public funds should be allocated to a resource that is not consistently deployed.

"29 incidents per year does not justify spending circa £400k on a fully equipped appliance."

5.8.2 Reallocation of resources to maximise wider system benefit

A related theme was that removing the second appliance could release resources for use elsewhere in the service. Responses highlighted the potential to redirect funding and capacity towards areas of higher demand or greater operational impact, framing reallocation as a means of improving overall efficiency and value for money across the system. In this context, some responses viewed the reduction in local provision as a necessary trade-off to achieve wider system benefit.

"This frees up finance for elsewhere, it's currently not cost effective."

5.8.3 Limited financial benefit of removal

In contrast, some responses questioned whether the financial savings associated with removal are sufficiently significant to justify the loss of capacity.

These responses suggested that the cost of retaining the appliance may be relatively low in the context of overall service expenditure, and that any savings may be offset by indirect costs, including increased reliance on neighbouring stations or additional resource movements.

> *"The monetary savings of removing the second engine do not seem to be significant enough to warrant the removal."*

5.8.4 Perception of cost reduction over service provision

A further strand of responses expressed concern that the proposal is driven primarily by cost reduction rather than service improvement. These responses emphasised that financial considerations should not outweigh the need to maintain effective emergency response capability, particularly where reductions in capacity may impact service quality, resilience, or community safety.

"This again seems like a proposal to save money rather than improve the service."

5.9 Impacts on Oxfordshire's communities - Additional Proposal B

5.9.1 Reduced immediate local backup and increased risk during concurrent incidents

Respondents expressed concern that removing the second appliance would reduce immediate backup capacity when the primary fire engine is already deployed. This was seen as increasing the risk that simultaneous or escalating incidents may not receive a timely response.

This was seen as increasing the likelihood of delays to critical interventions, particularly in situations involving multiple incidents, prolonged operations or rapidly developing emergencies.

5.9.2 Longer response times for additional resources and increased risk to life

Many respondents highlighted that, without a second local appliance, additional support would need to travel from further afield. This was seen as leading to longer and less predictable response times for second or supporting crews.

Respondents associated these delays with increased risk to life, property and firefighter safety, particularly where early reinforcement is critical to controlling incidents.

5.9.3 Reduced protection for Thame, surrounding villages and edge-of-county communities

Impacts were frequently described in relation to Thame, its surrounding villages, and edge-of-county communities. The proposal was seen as reducing overall fire cover across a wide and partly rural area.

These communities were described as more exposed due to distance, constrained road access, and reliance on limited alternative cover, including cross-border or more distant resources. The potential impact was seen as particularly significant for areas already experiencing longer or less predictable response times.

5.9.4 Reduced resilience during major incidents and along key transport routes

Respondents consistently raised concerns about the ability of the service to respond effectively during periods of high demand or major incidents. The second appliance was described as contributing to surge capacity and operational flexibility.

Its removal was seen as reducing the system's ability to manage large-scale incidents, including those occurring on major transport routes such as the M40, as well as overlapping or complex emergencies, increasing reliance on already committed or distant resources.

5.9.5 Impacts on community confidence and perceived safety

A number of responses highlighted the potential impact on how safe communities feel, particularly where visible local capacity is reduced. The presence of two appliances was associated with reassurance and preparedness for worst-case scenarios.

The removal of the second appliance was therefore seen as likely to reduce public confidence in local fire cover, particularly in a context of population growth, increasing demand and wider service changes.

5.9.6 Potential positive impacts from resource reallocation

A smaller number of respondents considered that the proposal could have wider benefits if resources are reallocated to areas of greater demand across Oxfordshire.

These responses suggested that this may improve overall service efficiency or coverage elsewhere in the county.

5.10 Suggestions to lessen the impact on Oxfordshire's communities – Additional Proposal B

5.10.1 Retain the second appliance at Thame

The most consistent suggestion was to retain the second fire engine at Thame, with many respondents viewing this as the clearest way to avoid reduced backup capacity, slower second-appliance response, and greater reliance on distant cover.

5.10.2 Improve recruitment, retention and support for on-call crews

Responses argued that the key issue is appliance availability rather than lack of need. Suggested mitigations focused on stronger recruitment and retention activity, improved support for on-call firefighters, greater employer engagement and continued use of Station Support Officers.

5.10.3 Invest in training and operational readiness

Many responses called for greater investment in training, qualifications and support to improve the availability and usability of the second appliance, rather than removing it.

5.10.4 Consider alternative or flexible crewing models

Some respondents suggested retaining the appliance through more flexible arrangements, such as reserve, surge or peak-demand use, or through alternative staffing models where full-time availability cannot be maintained.

5.10.5 Strengthen neighbouring and cross-border cover arrangements

A smaller group of responses suggested that, if changes proceed, clearer and more robust cover arrangements with neighbouring stations and Buckinghamshire should be in place to reduce the impact on Thame and surrounding communities.

5.10.6 Monitor impacts and review the decision

Some responses suggested a more cautious approach, including formal monitoring and review of response times, resilience and local impacts if any change is implemented.

6 QUALITATIVE FINDINGS: ADDITIONAL PROPOSAL C

6.1 Overview of responses

Responses to Additional Proposal C were predominantly characterised by concern, and in many cases opposition; focused on the closure of local fire stations and the potential impacts on community safety, response times and system resilience.

Respondents emphasised the importance of maintaining immediate local cover in and around Woodstock, Eynsham and Henley, particularly given their rural geography, distinct risk profiles and limited alternative provision. Concerns centred on increased reliance on more distant resources, potential delays in response, and reduced capacity during periods of high demand or concurrent incidents.

Respondents also questioned whether the evidence and modelling underpinning the proposal fully reflect real-world conditions, local variation and future risk, with particular scepticism about the use of average response times.

A smaller number of respondents expressed conditional support, primarily on efficiency grounds, subject to maintaining effective service coverage and avoiding reductions in protection.

6.2 Headline findings by theme

Six main themes were identified, which in summary were as follows:

Local stations, community safety and emergency cover

This was a central theme across responses and focused on the role of local fire stations in maintaining immediate emergency cover and community protection. Responses were primarily characterised by concern that closing stations in Woodstock, Eynsham and Henley may reduce local fire cover, increase reliance on more distant resources and weaken protection for rural, edge-of-county and higher-risk communities. These concerns were closely linked to local risk profiles, future growth and the wider safety role of stations as community assets. While a smaller number of respondents supported closure on efficiency grounds, this was typically conditional on maintaining effective alternative cover.

Response times

Responses to this theme were primarily driven by concern that closing local stations may increase response times, particularly in communities that would become more reliant on appliances travelling from further away. These concerns were closely linked to travel distance, congestion, local road conditions and the view that average response-time modelling may mask more significant impacts in specific places and during high-demand periods. A recurring view was that even if county-wide averages change only marginally, delays in affected communities may still be operationally significant.

Operational capacity and effectiveness

A prominent theme across responses was the role of local stations in supporting wider operational capacity and system resilience. Responses were often characterised by the view that closures may reduce backup capacity, limit flexibility during concurrent or major incidents and increase reliance on already committed or more distant resources. Some respondents also emphasised that stations with variable availability still contribute contingency capacity during periods of pressure. A smaller number suggested that capacity could be maintained through neighbouring stations or wider network changes, though this was generally conditional on those arrangements being reliable in practice.

Evidence base, modelling and consultation assumptions

Responses in this theme focused on whether the evidence base was sufficiently robust to support station closures. A recurring concern was that the modelling relies too heavily on average response times and historic data, and may not fully reflect local variation, operational complexity, future growth or high-impact scenarios. Some respondents also questioned the completeness, transparency and realism of the data and assumptions used. While a smaller number accepted the statistical case for change, many indicated that the current evidence does not provide sufficient confidence in the proposal's local impact.

Workforce sustainability, recruitment and retention

Responses within this theme recognised workforce availability as a genuine issue, particularly in relation to the sustainability of the on-call model. However, responses were more commonly characterised by the view that low availability reflects recruitment and retention challenges rather than lack of need for the stations themselves. In this context, many respondents argued that staffing issues should be addressed through recruitment, training, incentives and employer engagement rather than by removing local infrastructure. Some also raised concerns that closures may further weaken morale, visibility and longer-term workforce resilience.

Financial considerations

Responses reflected differing views on the financial case for station closures. Some respondents supported the proposal on efficiency grounds, particularly where stations were seen as low-activity or difficult to staff, and where resources could be redirected to areas of greater demand. However, a more prominent concern was that financial savings may come at the expense of local protection, resilience and future flexibility. Many responses emphasised that value for money should not be judged solely in terms of current activity levels where closures may reduce capacity in communities perceived to face distinct or evolving risks.

The following sections explore each theme, including the key issues raised, areas of agreement and divergence and perceived impacts.

6.3 Local stations, community Safety and emergency Cover

Responses relating to this theme emphasise the importance of local fire stations in providing immediate emergency cover. Across responses, concerns are primarily framed around the potential loss of local provision and the implications for response times, risk and protection in communities in and around Henley, Eynsham and Woodstock.

6.3.1 Local provision and immediate emergency response

Respondents argued that closing local fire stations would reduce immediate emergency cover for communities currently served by those stations. Concerns centred on increased reliance on appliances travelling from further away, with potential implications for the speed of initial response. This was frequently linked to perceived increased risks to life and property, with some respondents framing closures as placing communities in direct danger.

Respondents also emphasised the role of local fire stations in protecting communities, particularly in areas perceived to be more exposed or vulnerable, including rural locations and populations such as older people or those requiring additional support.

> *"You will lose vital fire cover... You will be putting local residents at risk with slower response times."*

6.3.2 Distance to cover and reliance on more distant resources

Respondents raised concerns that closing local stations would reduce fire cover in rural and more isolated areas, increasing reliance on appliances travelling from further away. This was seen as particularly significant in communities located at a distance from other stations, including those in the south of the county and along county boundaries, with some respondents suggesting these areas would be disproportionately affected.

Concerns centred on the reliability of this alternative cover, particularly where neighbouring or cross-border resources may already be committed or subject to competing demands. In this context, reliance on external provision was often viewed as uncertain and insufficient to replace local capacity, with rural and edge-of-county areas perceived to be more exposed as a result.

> *"Local stations are important to provide swift cover. It is dangerous to leave rural communities reliant on engines some distance away, particularly if it is a very busy time with multiple demands. They also have local knowledge that others further away lack, which may be vital."*

6.3.3 Specific local risk profiles requiring rapid nearby response

Some respondents highlighted that the characteristics of particular areas create distinct local risk profiles, where rapid nearby response is seen as especially important. These responses emphasise that the need for immediate fire cover is shaped not only by incident frequency, but by the nature and complexity of local risks.

Examples include historic and heritage buildings, dense town centres and nationally significant sites, where fires may spread quickly and have more severe consequences. Respondents also referred to periods of increased demand linked to major events and tourism, which can increase population density, traffic congestion and access constraints.

Environmental and infrastructure-related risks were also highlighted, including flooding from the River Thames and accident risks associated with major transport routes such as the A40, alongside access challenges in areas with narrow or congested roads. In addition, some responses pointed to commercial and industrial sites, as well as the presence of schools, care settings and older populations, where delayed response may have greater implications.

> *"We would be left very vulnerable and at danger. We are a historic town with old buildings, a very large population at certain times of the year and a river which puts the population at risk."*

6.3.4 Local knowledge, community presence and wider safety role

Respondents emphasised that locally based crews bring detailed knowledge of the communities they serve, including familiarity with local roads, buildings and risk factors. This place-based knowledge was seen as supporting faster and more effective responses, as well as informing prevention and community safety activity.

Beyond emergency response, local fire stations were described as visible and embedded community assets, contributing to reassurance, trust and ongoing engagement. In this context, stations were understood not only as response infrastructure, but as locally trusted institutions that support prevention work, first-response capability and community resilience, particularly in areas with more limited access to other emergency services. As such, their removal was often seen as reducing these wider community safety functions.

> *"Local crews have local knowledge, they know the area, are aware of local risks, know shortcuts and know their Station ground. They also offer valuable fire safety advice and promote recruitment at local events. They give so much 'unquantifiable' benefits to the local Community in terms of safety, recruitment and support."*

6.3.5 Wider resilience and future demand

Respondents raised concerns that future demand and risk may increase in areas currently served by the stations proposed for closure and that reducing local provision may be short-sighted in this context. These responses emphasised that the need for fire and rescue services is likely to evolve over time, shaped by population growth, development and wider environmental pressures.

In particular, respondents referred to planned housing growth and expansion in Woodstock, Eynsham and Henley, suggesting that increasing populations could lead to higher demand and place additional pressure on surrounding stations if local provision is reduced.

Some responses also highlighted changing risk profiles associated with development and infrastructure, including increased traffic, new building types and emerging risks linked to

technologies such as electric vehicles. Broader long-term pressures, including climate change and environmental risk, were also referenced as factors that may influence the frequency or severity of incidents.

In this context, some respondents expressed concern that permanently closing stations could reduce flexibility to respond to future changes in demand or risk, and that restoring capacity at a later stage may be difficult

> *"Eynsham is to be expanded by 2500 new homes... To even think of taking the fire station away is irresponsible."*

6.3.6 Cumulative impacts of proposals on fire cover

Some responses considered Additional Proposal C in the context of wider changes to the fire and rescue system, particularly the proposed closure of Kidlington Fire Station and the development of a new North Oxford station (Additional Proposal A).

Concerns centred on the cumulative impact of implementing multiple changes in combination, with respondents suggesting this could create gaps in coverage if existing stations are removed before alternative provision is fully operational. This was associated with increased reliance on more distant resources, reduced accessibility in areas currently served by strategically located stations and greater uncertainty around overall system resilience.

These respondents emphasised that the impact of closing stations such as Woodstock, Eynsham and Henley depends on how these changes interact across the wider network, highlighting the importance of sequencing changes carefully and ensuring that new provision is in place and demonstrably effective before existing stations are removed.

A smaller number of responses suggested that, if appropriately located and resourced, a new North Oxford station could maintain or improve overall coverage.

> *"...along with the closure of Kidlington fire station, there will be a huge area in the centre of the county, with low levels of fire cover."*

6.4 Response times

Response-time considerations were a key component of responses to Additional Proposal C, including concerns about the modelling used, the practical realities of travel and coverage, and the potential impact on local response times.

6.4.1 Concerns about response-time modelling and use of averages

Respondents expressed scepticism about the response-time modelling presented in the consultation, particularly the suggestion that station closures would result in only marginal changes to average response times. These findings were frequently viewed as not credible or reflective of real-world conditions.

Concerns centred on the use of county-wide averages, which respondents argued obscure local impacts and mask more significant increases in response times for affected communities.

Some respondents also questioned the robustness and transparency of the underlying data, suggesting more localised analysis would be required to understand impacts in specific areas.

> *"... the average response figures quoted disguise the very large effect on local response times... the '1 second' increase in response times is clearly false, as it relates to Oxfordshire average times not local response times."*

6.4.2 Travel distance and local conditions

Concerns about the modelling were often linked to perceptions that it does not fully reflect the practical realities of response, particularly in relation to travel distance and local conditions.

Respondents suggested that closing local fire stations would increase travel distances to incidents, particularly in more rural and dispersed areas, leading to greater reliance on neighbouring stations and slower initial response.

Concerns also focused on whether the modelling adequately captures real-world travel conditions, including traffic congestion, roadworks, seasonal events and access constraints, particularly in areas with known bottlenecks or high visitor numbers.

In this context, locally based appliances were seen as more likely to reach nearby incidents quickly than cover travelling from further away, with distance, geography and traffic conditions seen as sources of delay. Some respondents also suggested that existing response times are already stretched, and that reducing local capacity could risk further deterioration.

Delays were also seen as more pronounced during periods of high demand or concurrent incidents, where reliance on more distant or already committed resources could further extend response times.

> *"I don't believe the statements about response time being affected by a few seconds given the distances that would need to be covered by appliances having to travel five to ten miles to reach a fire in the centre of those three locations."*

6.5 Operational capacity and effectiveness

Responses within this theme focus on the role of local fire stations in supporting operational capacity and resilience across the wider network. Concerns are framed around how the system would function under pressure, particularly during periods of increased or concurrent demand.

6.5.1 Operational capacity under pressure and during multiple or major incidents

Respondents argued that local stations provide nearby, immediately available appliances able to respond to secondary or concurrent incidents when other resources are already deployed. They were also described as supporting escalation, including providing additional crews, second appliances or reinforcement at ongoing incidents.

Closing stations was therefore viewed as reducing local backup, increasing reliance on more distant or already committed resources, and limiting the service's ability to maintain effective response across multiple incidents.

> *"Don't you realise multiple calls can happen at once?!"*

6.5.2 Role of variable-availability stations in system resilience

Some respondents further highlighted that stations with variable or lower availability may still contribute to overall capacity, particularly during periods of high demand. Reduced availability was not seen as equivalent to no value, with stations described as providing additional or contingency cover when nearby resources are already committed.

Closures were therefore seen as reducing flexibility within the system and increasing reliance on a smaller number of locations. Some responses also referred to wider operational roles, including hosting or crewing specialist or support units, which were seen as contributing to overall capability but not always fully reflected in the consultation analysis.

More broadly, closures were described as a permanent reduction in system capacity, even where day-to-day availability is variable.

> *"Even though these stations struggle to make the appliance available I do think having them as an option would be a good thing for the service."*

6.5.3 Perceived ability to maintain capacity through alternative provision

A smaller number of respondents suggested that operational capacity could be maintained, or in some cases improved, through alternative provision across the wider network. This included reliance on neighbouring stations, cross-border support, or the proposed North Oxford station to provide cover for areas affected by closures.

Some respondents argued that stations with low activity or availability may not justify continued operation if equivalent or improved cover can be delivered from elsewhere. Others suggested that concentrating resources in fewer, more reliably crewed locations could support more consistent service delivery.

However, this view was typically conditional on the assumption that alternative provision would be sufficient and consistently available.

> *"Given the figures provided, this sounds like a sensible way to redirect investment."*

6.6 Evidence base, modelling and consultation assumptions

Responses within this theme focus on the robustness of the evidence underpinning the proposal, including the data used, modelling approach and presentation of findings. Concerns centre on accuracy, transparency, and whether the evidence reflects real-world conditions and future risk.

6.6.1 Over-reliance on averages masks local and high-impact risk

Respondents questioned the reliance on average response times, suggesting these do not reflect operational reality. Averages were seen as masking local variation and more significant impacts in specific areas, as well as failing to capture more complex scenarios such as concurrent incidents, committed resources or disrupted conditions.

Small differences presented in the modelling (often described as one or two seconds) were widely seen as insufficient to justify permanent changes to infrastructure and service provision. In this context, some respondents described the evidential case for change as marginal or unconvincing.

Some responses also called for greater consideration of higher-impact scenarios, including major incidents or peak demand, alongside more localised analysis to understand impacts at a community level.

> *"A single incident delayed by 5–10 minutes is invisible in an average."*

6.6.2 Data quality, completeness and transparency

Respondents questioned the accuracy, completeness and transparency of the data underpinning the proposal. Concerns included the use of outdated datasets, omission of relevant activity, and inconsistencies in reported figures.

Some responses suggested that incident, availability and response-time data may not capture the full range of operational activity, particularly in border areas where cross-county incidents form a significant part of demand.

Others raised concerns about the time period used for analysis, including reliance on COVID-affected years or temporary operating conditions, which were seen as not fully representative of current service activity.

Some respondents also identified perceived inconsistencies between figures presented in consultation materials or public engagement, suggesting the evidence base may not reflect the most recent operational position.

More broadly, some responses suggested that the evidence relies on a narrow set of indicators, which may not capture wider operational roles such as cross-cover, specialist functions or contributions to system resilience.

> *"…the figures on cover don't tell the whole story."*

6.6.3 Modelling assumptions and transparency

Respondents raised concerns that modelling assumptions do not fully reflect how the service operates in practice. In particular, some responses suggested that assumptions about resource availability do not account for concurrent incidents, disrupted conditions or wider system pressures.

Some respondents also called for greater transparency around the modelling approach, with a perception that the analysis may not fully capture operational complexity or provide a sufficiently robust basis for decision-making.

“Modelling is not the same as reality.”

6.6.4 Lack of forward-looking evidence

Some responses suggest that the evidence base relies too heavily on historic data and does not sufficiently account for future changes in risk, including population growth, development and climate-related and environmental risks such as flooding or wildfires.

> *“Statistics don't tell the whole story either as they are based on past performance and not …the future.”*

6.6.5 Views supporting the use of evidence

A smaller number of responses supported the use of evidence in the consultation or accepted the statistical case for change. In these responses, operational data was seen as an appropriate basis for decision-making, particularly where stations were described as having consistently low staffing availability.

> *“This decision has to be taken on the basis of the overall picture of available assets and also the history of crew availability for the appliance.”*

6.7 Workforce sustainability, recruitment and retention

Responses within this theme focus on workforce challenges, particularly recruitment, retention and staffing capacity. Low availability is frequently identified as a key issue, with concerns about how the proposals may affect staffing levels, morale and longer-term workforce resilience.

6.7.1 Staffing shortages seen as the root issue, not station viability

Respondents commonly described low availability at affected stations as a workforce challenge rather than evidence that stations are no longer required. Reduced availability was frequently linked to difficulties in recruitment and retention, rather than a lack of demand or risk within the communities served.

Some responses suggested that the proposals focus on changes to stations or infrastructure without addressing these underlying workforce issues. Others indicated that, with targeted intervention, staffing levels could improve over time and that closures may limit the opportunity to rebuild local capacity.

> *“Low availability should be treated as evidence that the on-call system needs urgent reform and investment, not as justification to remove local fire cover.”*

6.7.2 Calls for stronger recruitment, retention, training and incentives

Many responses called for more active efforts to strengthen the on-call workforce. These included increased recruitment activity, improved engagement with local employers to support daytime availability, and enhanced incentives such as pay, conditions or flexibility.

Some respondents also highlighted the importance of training and skills development, particularly for roles such as drivers or officers, suggesting that targeted investment could improve station availability. In this context, workforce-focused measures were often presented as an alternative to station closures.

> *"The problem seems to be a lack of firefighters. I have not seen a recruiting campaign in a long time. More effort and engagement needed."*

6.7.3 Perceived impact on morale and future workforce resilience

Responses also raised concerns about the potential impact of the proposals on morale, retention and future workforce capacity. On-call firefighters were often described as committed members of their communities, with concerns that closures could lead to the loss of experienced personnel or reduce motivation among those who remain.

Some respondents also suggested that removing local stations could reduce the visibility of the on-call role and make future recruitment more difficult, with potential implications for longer-term workforce sustainability.

> *"Low availability doesn't mean low risk... Rather than closing the stations, I think the service should explore ways to boost recruitment, support on-call crews better, and look at alternative models before removing these facilities completely"*

6.7.4 Practical constraints and challenges in maintaining availability

A minority of responses highlighted ongoing difficulties in recruiting and sustaining on-call crews, suggesting that some stations are consistently unable to maintain availability. In this context, some respondents indicated that the impact of changes may be more limited where availability is already low, or that resources could be used more effectively elsewhere.

> *"The three stations struggle to crew at the minute (without additional overtime costs from off duty wholetime employees) This means that the effect on the local population will be less than expected"*

6.8 Financial Considerations

Responses within this theme reflect differing views on the financial case for the proposal, particularly in relation to efficiency, value for money and the trade-offs between cost savings and service provision.

6.8.1 Perceived inefficiency of low-activity stations

Responses described the affected stations as representing poor value for money, with low incident numbers and limited availability seen as insufficient justification for ongoing costs.

> *"These stations appear to be poor value for money in terms of coverage provided."*

6.8.2 Support for resource reallocation and efficiency

Some respondents supported redistributing funding, staffing and assets to areas where they could deliver greater operational benefit, including investment in wholetime provision or higher-demand locations.

In this context, the relatively small, reported impact on response times was seen as indicating that savings could be achieved without significantly affecting overall service delivery.

> *"If they aren't being of use and the money can be used elsewhere then I would suggest closing them and moving those resources somewhere else, or for more important stations."*

6.8.3 Concerns about cost-driven reductions in service provision

Other responses emphasised that financial savings should not be prioritised over service provision or safety. Some respondents questioned whether the scale of potential savings justified station closures, particularly where this may reduce local cover.

There were also concerns about the longer-term implications of removing infrastructure, including the cost or difficulty of reinstating stations in the future. Some responses suggested that alternative approaches, such as increased funding or targeted investment, could be considered to maintain service provision and local presence.

> *"…I understand the service needs to run like a business but closing the stations means you will never get the station back again."*

6.9 Impacts on Oxfordshire's communities

6.9.1 Loss of immediate local protection and fastest response

Respondents expressed concern that closing stations in Henley, Eynsham and Woodstock would remove immediate local fire cover for residents, leaving these areas without nearby response capability. This was framed as a direct reduction in protection, with greater risk of incidents escalating before crews arrive and potential implications for risk to life and property.

6.9.2 Disproportionate impacts on rural, edge-of-county and dependent communities

Impacts were seen by some as uneven, with rural, dispersed and edge-of-county communities, particularly in South Oxfordshire, identified as most affected.

This includes villages and hamlets within each station ground, areas reliant on constrained access routes, and locations dependent on cross-border support. These communities were described as already more exposed due to distance and limited alternative cover, with closures seen as widening inequalities in protection.

6.9.3 Communities with higher or evolving risk profiles facing reduced protection

Many responses emphasised that affected areas are growing and changing, with increasing and more complex risk. This includes housing growth, particularly along the A40 corridor, alongside rising traffic, tourism and major events.

Environmental risks, including flooding and wildfire, were also highlighted, alongside place-specific risks such as heritage buildings, historic centres and industrial or agricultural activity. A consistent concern was that these local and evolving risks may not be fully reflected in county-wide assessments.

6.9.4 Loss of local fire stations as community assets and prevention capacity

Local fire stations were described as community assets contributing to prevention, engagement and reassurance. Their removal was seen as reducing activities such as Safe and Well visits, school engagement and community outreach, alongside the loss of visible presence.

Respondents also highlighted the loss of local knowledge held by crews, including familiarity with local risks and infrastructure. These impacts were seen as particularly affecting vulnerable groups and communities reliant on local relationships.

6.9.5 Reduced system resilience and reliability in high-demand or major incidents

Concerns also focused on system performance under pressure. Local stations were seen as providing backup capacity during concurrent incidents and supporting response to major or complex events.

Their removal was viewed as reducing system flexibility, increasing reliance on distant or already committed resources, and leading to longer or less predictable response times in high-demand scenarios. Impacts were seen as most acute in rural and already under-served areas

6.10 Suggestions to lessen the impact on Oxfordshire's communities

6.10.1 Maintain local provision and address underlying staffing challenges

The most consistent suggestion was to avoid station closures and instead address underlying workforce challenges. Respondents emphasised recruitment, retention and support for on-call firefighters as key to improving availability and maintaining local cover.

6.10.2 Strengthen staffing support, training and operational capacity

Many responses called for increased investment in workforce support mechanisms to improve availability and operational effectiveness. This included expanding training provision,

particularly for specialist and operational roles, and strengthening functions such as Station Support Officers to improve crew readiness and bring appliances into operation more consistently.

6.10.3 Explore alternative staffing and operating models

Some respondents suggested alternative staffing and operating models to retain local provision while addressing capacity or cost pressures. These included hybrid staffing approaches, shared on-call arrangements, and more flexible models such as part-time or time-limited cover.

In some cases, retaining stations in a reduced or standby capacity was proposed to support surge demand or major incidents.

6.10.4 Phase implementation and review impacts before further changes

A number of responses emphasised the need to sequence changes carefully. Rather than implementing closures simultaneously, respondents suggested a phased approach with clear review points to assess real-world impacts on response times, resilience and community confidence before further changes are made.

6.10.5 Maintain resilience and reinvest in affected areas

Where changes are implemented, respondents emphasised the need to maintain system resilience and ensure effective alternative cover. This included demonstrating how concurrent incidents would be managed and retaining flexibility within the system until new arrangements are proven.

Some responses also highlighted the importance of transparently reinvesting any financial or staffing savings into response capacity, resilience and community safety activity, particularly in affected areas.

7 STAKEHOLDER SUBMISSIONS TO THE CONSULTATION

7.1 Introduction

The consultation on proposals to improve Oxfordshire Fire and Rescue Service attracted a substantial number of direct written responses from a wide range of stakeholders. Direct submissions were received from local authorities, workforce representative organisations, neighbouring fire services, major institutions, community organisations and individual residents.

These responses share stakeholder views of the consultation proposals and wider issues in the fire and rescue service. Across the submissions there is recognition that the service faces genuine operational pressures, particularly in relation to the declining availability of on call firefighters and the difficulty of maintaining reliable daytime crew availability. Submissions were received from:

- Brize Norton Parish Council
- Cherwell District Council
- Chipping Norton Town Council
- Cllr Carl Rylett, West Oxfordshire District Council, Eynsham Parish Council
- Cllr Gareth Epps, Deddington Division, Oxfordshire County Council
- Eynsham Parish Council
- Fire Brigades Union (FBU)
- Harwell Parish Council
- Layla Moran MP Member of Parliament for Oxford West & Abingdon
- Northamptonshire Fire and Rescue Service
- Royal Berkshire Fire and Rescue Authority
- The Fire and Rescue Services Association
- The Registrar, University of Oxford
- Thrupp Canal Cruising Club (TCCC)
- University of Oxford (Division of Gardens and Libraries (GLAM) and the Bodleian Libraries)
- West Oxfordshire District Council
- Witney Town Council
- Wolvercote Neighbourhood Forum (WNF)
- Woodstock Town Council
- 26 Individual Resident Responses

The detailed themes emerging from consideration of these responses is discussed below and the detailed responses are available for consideration in Appendix C of this analysis report.

7.2 Overall Sentiment of Consultation Responses

Analysis of the consultation responses indicates that sentiment towards the proposals is predominantly negative. While respondents broadly recognise the need for the fire and rescue service to adapt to changing operational conditions, most submissions express opposition to the specific measures proposed.

Based on the responses reviewed, the distribution of views can broadly be summarised as follows:

- approximately three quarters (70-75%) of responses oppose the proposals overall.
- approximately a quarter (20-25%) express mixed or conditional views
- around 5-to-10% express support for the proposals

Even where conditional support is expressed, this is typically limited to specific elements of the proposals, such as improving daytime availability through increased wholetime staffing. The dominant message across the responses is that reform should prioritise strengthening workforce capacity rather than reducing infrastructure or operational resources.

As one individual resident respondent noted:

"I support change but not change that removes capability before fixing the system."

7.3 Recognition of the Need for Reform

A common starting point across many responses is recognition that the fire and rescue service must adapt to changing circumstances. Respondents frequently highlight the declining availability of on call firefighters during daytime hours as one of the most significant challenges facing the service.

Several stakeholders acknowledge that maintaining fire engines which cannot reliably be crewed during the day may represent an inefficient use of resources. Some respondents therefore support proposals aimed at improving daytime availability through increased wholetime staffing at selected stations.

However, respondents consistently distinguish between the principle of reform and the specific proposals under consultation. While the need for reform is widely accepted, many stakeholders question whether the measures proposed represent the most effective way to address the underlying structural issues affecting the service.

7.4 Concerns About Fire Station Closures

The most frequently cited concern relates to proposals to close several on-call fire stations (Eynsham, Woodstock and Henley). Local authorities, community organisations and residents argue that closing these stations could reduce the resilience of the fire service network and increase response times for specific communities. Woodstock Town Council, for example, stated in its consultation response that the closure of the local station would…

"…materially undermine public safety and significantly reduce the resilience of the fire and rescue system."

Several respondents emphasise that county wide averages may obscure the impact of these changes at the local level. Individual residents and community groups note that while modelling may show limited changes to overall response time averages, the impact for particular towns could be significantly greater.

One resident submission suggested that response times in Henley could increase from approximately eight minutes to between sixteen and twenty minutes if the station were closed.

Respondents also highlight that fire stations play an important role beyond emergency response. They serve as centres for prevention activity, community engagement and local risk awareness. Several stakeholders argue that removing these facilities could weaken both operational capability and the relationship between the fire service and local communities.

7.5 Evidence Base and Response Time Modelling

Another significant theme across the consultation responses concerns the modelling used to support the proposals.

Many respondents argue that the consultation relies heavily on county wide average response times, which may not adequately reflect variations in risk at the local level. Local councils and community organisations note that averages can obscure the distribution of response times and fail to capture worst case scenarios.

Cherwell District Council, for example, argued that the consultation should provide more detailed analysis of response time distribution and community level impacts

Some respondents also highlight the absence of publicly available station level response time data within the consultation documentation. One resident submission noted that although modelling appears to use detailed operational data, the consultation materials do not present average attendance times for individual fire stations, making it difficult to evaluate the potential impact of proposed closures.

Workforce representative organisations similarly question whether modelling based on theoretical station locations adequately reflects real operational conditions. Factors such as traffic congestion, simultaneous incidents and crew availability may significantly influence actual response times (Fire Brigades Union submission).

7.6 Workforce and Operational Implications

Workforce implications represent another major theme within the consultation responses. Several stakeholders emphasise the importance of maintaining workforce stability and morale in order to ensure the long-term sustainability of the service.

The Fire Brigades Union (FBU) submitted a detailed response expressing strong concern about the potential workforce impacts of the proposals. The union argues that the package of changes would effectively represent a reduction in fire cover through the removal of stations and appliances and increased reliance on an already stretched on call system.

The FBU stated:

“The package amounts to a reduction in fire cover and resilience dressed as efficiency.”

The union also raised concerns about possible reductions in crewing levels, changes to duty systems and the potential impact of restructuring on firefighter safety and operational effectiveness. According to the FBU, such changes could increase operational pressure on remaining crews and create fatigue risks.

Similar concerns are echoed in responses from individual firefighters and community respondents who argue that reductions in infrastructure may make recruitment and retention more difficult at a time when the service already faces workforce challenges.

At the same time, several stakeholders acknowledge that difficulties with the on-call system are genuine and require attention.

The Fire and Rescue Services Association highlights a long-term decline in on call availability and argues that solutions should focus on improving recruitment, employer engagement and training arrangements rather than reducing the number of fire stations.

7.7 Specialist Rescue Capability

A number of stakeholders raise concerns regarding proposals affecting specialist rescue capability currently based at Kidlington.

Several organisations argue that removing or redistributing this capability could reduce the service’s ability to respond effectively to complex incidents such as serious road traffic collisions, water rescues and technical rescues.

Community organisations associated with waterways and flood risk management highlight the importance of maintaining specialist rescue capability in a county with extensive rivers and canals. These organisations argue that climate change may increase the likelihood of flooding events, potentially increasing demand for water rescue services in the future (Inland Waterway organisations consultation responses).

7.8 Impact on Oxford City

Major institutions based in Oxford city also raise concerns about the potential relocation of fire service resources away from the city centre.

The University of Oxford notes that the city contains the highest concentration of fire incidents in the county, as well as a significant number of historic buildings and research facilities with complex fire risks. The university argues that reducing resources in this area could increase response times in locations with both the highest incident demand and the greatest concentration of heritage assets.

The university also cites a recent fire incident at Mansfield College in which rapid intervention by the fire service prevented significant damage to a historic library building, illustrating the importance of maintaining nearby fire cover.

7.9 Cross Border and Regional Implications

Responses from neighbouring fire services highlight the importance of considering the wider regional impact of the proposals.

The Royal Berkshire Fire Authority notes that its crews already attend a substantial proportion of incidents in areas of Oxfordshire close to the county border. According to the authority, approximately 66.4% of incidents in the Henley station area already involve Royal Berkshire appliances.

The authority warns that closing Henley fire station could increase cross border deployments and place additional operational pressure on neighbouring stations.

7.10 Strategic Context and Future Risk

Several respondents place the proposals within a wider strategic context, highlighting factors that may increase demand for fire and rescue services in the future.

These factors include population growth, housing development, the expansion of science and technology facilities in Oxfordshire and the increasing impact of climate change. Stakeholders highlight the growing risk of flooding, storms and wildfires and argue that these trends may increase the need for distributed emergency response capacity.

7.11 Procedural Fairness Issues

The FBU submission raises several specific procedural fairness concerns related to compliance with the Gunning principles, as upheld by the UK Supreme Court in R (Moseley) v Haringey. In this regard, several issues are raised that are distinct from the merits and safety considerations discussed elsewhere in this section, specifically:

- The consultation was not genuinely at a formative stage (because the organisational "direction of travel" was already fixed and communicated),
- Consultees were not given sufficient reasons / adequate information to respond intelligently (because critical modelling assumptions and options logic were not transparently explained in user-accessible terms),
- Practical time and capacity constraints (including holiday periods and the cognitive load of technical packs) reduced meaningful participation, and
- aspects of internal communications risked chilling workforce participation (undermining inclusiveness and equality-sensitive engagement).

There is also commentary provided on the extent to which the distributional trade-offs acknowledged in the EqIA provided for fair consideration of the council's obligations under the Public Sector Equality Duty .

7.12 Summary

Overall, the consultation responses expose a fundamental tension between the objective of modernising Oxfordshire Fire and Rescue Service and the risk of diminishing operational resilience through the removal of capacity. While there is broad recognition that the service faces serious structural challenges, particularly in relation to the availability of on-call

firefighters, stakeholders consistently warn that the proposed restructuring risks weakening the very foundations on which public safety depends.

The Fire Brigades Union (FBU), as the statutory professional body representing operational firefighters, articulates this concern most clearly. The union's submission presents the proposals not as a balanced reform programme, but as a package that removes stations, appliances, and staffing headroom without first resolving the workforce pressures that undermine service reliability. In doing so, the FBU frames the proposals as a tangible reduction in fire cover rather than a reconfiguration of resources.

Importantly, the FBU's position is not limited to industrial or workforce interests but is presented as a professional assessment of operational risk. The union warns that reducing infrastructure and staffing margins increases the likelihood of appliance unavailability, delayed response at critical incidents, and heightened fatigue and safety risks for firefighters. From this perspective, the reliance on average response times and theoretical modelling is seen as insufficient to demonstrate that public safety can be maintained under real-world conditions, particularly during periods of concurrent or high-risk incidents.

This professional warning is reinforced by local authorities, major institutions, neighbouring fire services, and community organisations, many of whom express concern that the proposals place disproportionate emphasis on efficiency while underestimating the importance of resilience, local knowledge, and surge capacity. Across the responses, there is a consistent message that the loss of stations, appliances, or specialist capability may be irreversible and could compound existing workforce recruitment and retention challenges.

Consultation responses highlight risks in proposed changes and urge a cautious approach. Stakeholders, especially the FBU, recommend prioritising workforce capability and duty system stability before reducing operational infrastructure. There is agreement that adaptation is necessary but stressing that it should not compromise firefighter safety, resilience, or public trust. Overall, the tone of submissions suggest decision-makers carefully assess proposals as professional risk reviews to ensure public safety and service sustainability.

8 Conclusion

This consultation provides a clear and consistent evidence base on public and stakeholder views of the proposed changes to Oxfordshire Fire and Rescue Service. Across all proposals, responses were predominantly negative, with a high proportion of respondents expressing strong concern about potential impacts on service delivery.

While there is recognition among some respondents of the need to reform the service and improve alignment between resources and demand, support for the proposals is typically conditional. This conditionality is consistently linked to the ability of the proposals to maintain effective local coverage, deliver reliable response times, and ensure sufficient operational capacity and resilience under real-world conditions.

A central finding across the consultation is the importance of perceived safety and service reliability in shaping public confidence. Concerns are frequently grounded in how the proposals are expected to operate in practice, particularly in relation to local availability of resources, response performance during periods of high demand, and the sustainability of the proposed workforce model.

Confidence in the proposals is also closely linked to the strength and clarity of the supporting evidence. Respondents frequently call for greater transparency, more realistic modelling, and clearer articulation of how risks will be managed, particularly where proposals involve changes to local provision or service configuration.

Overall, the findings indicate that while there is openness to change in principle, confidence in the proposals is dependent on clear and demonstrable assurance that service effectiveness, safety and reliability will be maintained.

Appendix A: Full Demographic Tables

This appendix provides the full demographic breakdown of consultation respondents (N=1230). Percentages are based on total submissions unless otherwise stated.

Respondent Type

Base: All respondents (N=1230)

Respondent Type	Count	%
An Oxfordshire resident	1031	83.8%
A member of the public living outside of Oxfordshire	40	3.3%
A business	26	2.1%
A representative of a group or organisation	31	2.5%
An employee of Oxfordshire Fire and Rescue Service on a wholetime duty system	83	6.7%
An employee of Oxfordshire Fire and Rescue Service on the on-call duty system	62	5.0%
A non-operational employee of Oxfordshire Fire and Rescue Service	19	1.5%
A former employee of Oxfordshire Fire and Rescue Service	46	3.7%
A friend or family member of a currently employed or former employee of Oxfordshire Fire and Rescue Service	72	5.9%
A current or former employee of a fire and rescue service other than Oxfordshire	16	1.3%
A parish, town, district, or county councillor	52	4.2%
Other (please specify)	14	1.1%

Age

Base: All respondents (N=1230)

Category	Count	%
Under 16	1	0.1%
16 - 24	21	1.7%
25 - 34	90	7.3%

Category	Count	%
35 - 44	172	14.0%
45 - 54	231	18.8%
55 - 64	251	20.4%
65 – 74	200	16.3%
75 - 84	130	10.6%
85 or over	16	1.3%
Prefer not to say	93	7.6%
Skipped	25	2.0%

Sex

Base: All respondents (N=1230)

Category	Count	%
Female	502	40.8%
Male	542	44.1%
Prefer not to say	145	11.8%
I use another term (please state here)	6	0.5%
Skipped	35	2.8%

Ethnic Group or Background

Base: All respondents (N=1230)

Category	Count	%
Asian or Asian British (Indian, Pakistani, Bangladeshi or any other Asian background)	13	1.1%
Black or Black British (Caribbean, African, or any other Black background)	3	0.2%
Chinese	4	0.3%
Mixed or multiple ethnic groups (White and Black Caribbean, White and Black African, White, and Asian, and any other mixed background)	14	1.1%

Category	Count	%
White (British, Irish, or any other white background)	970	78.9%
Prefer not to say	187	15.2%
Other ethnic group or background (please specify)	6	0.5%
Skipped	33	2.7%

Disability or Long-Term Health Condition (Q33)

Base: All respondents (N=1230)

Category	Count	%
Yes - a lot	45	3.7%
Yes – a little	113	9.2%
No	880	71.5%
Prefer not to say	154	12.5%
Skipped	38	3.1%

Appendix B: Impact Assessment FBU Campaign

Introduction

The Fire Brigades Union (FBU) produced and distributed a briefing as a structured campaign guide designed to guide responses to the Oxfordshire Fire and Rescue Service consultation. It provided clear instructions on how to complete the survey, including recommending specific answer choices (such as “strongly disagree” or “very negative”) and offering suggested wording for open text responses. While it encourages respondents to use their own words, it also supplies key phrases and arguments to include, focusing on opposition to proposed changes.

The document is a comprehensive campaign document which consistently promotes a set of core positions, including opposing fire engine reductions, station closures, reduced night time cover, and the introduction of 12-hour shifts. It frames the proposals as increasing risk, particularly through slower response times and impacts on vulnerable communities, and calls for alternatives such as increased investment, maintaining existing resources, and further consultation.

Overall, the briefing acts as a coordinated messaging tool to support a campaign against the proposed changes and to guide respondents toward a consistent, negative response across the consultation.

Assessment Methodology

In recognition of the effectiveness of the FBU’s campaign we undertook a separate analysis to attempt to quantify the

The analysis used a structured approach to identify patterns of coordinated responses within the consultation data. All open text answers were cleaned and standardised, then analysed to detect exact duplicates and high levels of similarity between responses. Responses were compared using text similarity techniques and grouped where wording was very close, allowing identification of clusters of responses that appeared to follow shared templates or guidance. Timing of submissions was also considered, with responses compared before and after the campaign launch date.

To estimate campaign influence:

- Responses were classified based on how closely they matched others and whether they formed part of large, highly similar clusters submitted after the campaign began.
- The most conservative estimate focused only on tightly grouped responses with strong textual similarity and clear alignment with campaign messaging.
- Broader indicators included responses that were less similar but still showed signs of shared wording.

This approach provides a consistent way to measure visible templating, while recognising that more subtle forms of influence cannot be directly detected.

Summary of FBU Campaign Influence

Overall pattern of responses

The consultation received 1,230 responses, with a very large majority (94%) submitted after 3 November 2025, the approximate launch date of the FBU campaign. This clear surge strongly suggests mobilisation activity, but timing alone is not sufficient to identify the source of that mobilisation.

What can be quantified with confidence

A small proportion shows clear template use: Analysis identifies a small but measurable group of responses that closely match campaign wording:

- Around 2 to 3 percent of responses show strong evidence of being directly based on campaign templates
- A slightly larger group (around 4 to 6 percent) shows copy and paste or lightly edited similarities

These responses:

- Use very similar or identical phrasing
- Appear almost entirely after the campaign start date
- Closely match language from the FBU briefing document

Conclusion: There is clear, quantifiable evidence of some template driven responses, but this group is relatively small.

Strong alignment with campaign messaging

Across the dataset:

- Certain phrases and arguments closely match FBU campaign materials
- Responses using these patterns cluster around specific consultation questions
- Recommended answer options (for example strong disagreement or negative impacts) become much more common after the campaign began

Conclusion: There is strong evidence of influence on how people responded, even where wording is not identical.

What cannot be reliably quantified

Total campaign reach

It is not possible to measure how many responses were influenced by the campaign overall. This is because:

- Many respondents may have used their own words, even if influenced
- The dataset does not include source or referral information (for example how people heard about the consultation)
- There are no identifiers such as IP address or campaign tracking data

Implication: The measured figures (2 to 6 percent) represent only the visible “template” portion, not the full impact.

Attribution of the response surge

Although the timing shows a large increase in responses after early November, it cannot be proven that:

- All or most of this increase is due to the FBU campaign
- Other factors (media coverage, community networks, general awareness) did not also contribute

Implication: The campaign is likely a major driver, but this cannot be isolated with certainty.

Distinguishing influence from shared opinion

Even where responses are similar:

- People may independently express the same concerns or views
- Similar language may come from shared public narratives, not direct copying

Implication: Some similarity may reflect genuine consensus rather than coordinated messaging.

Summary

- There is clear evidence of campaign activity influencing responses, particularly through templated or closely aligned wording
- However, this influence is only partially measurable
- The quantified figures represent a lower bound, capturing only the most obvious cases
- The true scale of influence is likely higher, but cannot be precisely measured with the available data

Conclusions

- Quantifiable influence: small but clear (around 2 to 6 percent)
- Unquantifiable influence: likely much larger but cannot be measured directly
- Overall conclusion: the campaign clearly shaped participation and messaging, but its full impact cannot be precisely determined

Appendix C: Stakeholder Written Submissions

Businesses, public body or organisation responses

Richard Ovenden OBE, MA, FRSA, FSA, FRHistS, FRSE, HonFRSL, HonFBA

Bodley's Librarian & the Helen Hamlyn Director of the University Libraries

Clarendon Building, Broad Street, Oxford OX1 3BG
T: 01865 277158 E: richard.ovenden@bodleian.ox.ac.uk

BODLEIAN LIBRARIES
UNIVERSITY OF OXFORD

31 January 2026

To whom it may concern,

Response to the proposals to close Rewley Road Fire Station and relocate the service to a new location north of Oxford.

I would like to formally express concerns on behalf of the both the Division of Gardens Libraries and Museums (GLAM) at the University of Oxford, and the Bodleian Libraries (I lead both the Bodleian and GLAM)

The reasons for expressing these concerns for both the Bodleian and for GLAM are essentially the same. The risk from fire to life safety is of paramount concern for both GLAM and the Bodleian, and the risk to the historic collections (many of them held on behalf of the nation) and to the historic buildings in the centre of Oxford in which collections, staff, students, researchers and visitors come together are profound risks which we feel are well mitigated by the presence of the Fire Station in its current Rewley Road location, and which we regard the move away from as being of major concern.

Allow me to arrange my concerns under there headings:

1. **People**

The presence of the Fire Service so close to the centre of Oxford has been of great benefit to GLAM and to the Bodleian for many years. I have been in senior management at the Bodleian (the Director for the last 12 years) and the Fire Service has responded with astonishing speed. Although there have been no serious incidents in that time, the alarms that have occasionally been triggered have been real, and the speed of response has given myself and the Directors of the Museums (in particular) comfort that the lives of people working, studying, or visiting our institutions would be protected. The Bodleian has on a typical day between 7-9,000 students and researchers using its reading rooms. Across GLAM a typical day will see over 10k members of the public visiting our public sites.

2. **Buildings**

Many of the GLAM buildings, and many of the Bodleian buildings are of the highest level of architectural and cultural significance. There are numerous Grade 1 Listed Buildings, including the Radcliffe Camera, the Old Bodleian Library, and the Divinity School which are some of the most significant buildings in the city, and together with the Sheldonian Theatre, the University Church, and the older colleges surrounding Radcliffe Square form a group of historic structures of outstanding importance culturally, and a great attraction to visitors to come to the city either for academic reasons or for tourism). The protection and preservation of these buildings is of grave concern to the GLAM, the Bodleian and to the University. Many of these buildings are ancient, and have inherent structural issues which make them hard to provide the most modern fire protection.

Continued....

3. Collections

GLAM institutions hold collections of immense global cultural and historic significance. The most important of these are physically held in the buildings of the GLAM institutions in central Oxford: ranging from ancient Papyri to medieval manuscripts and renaissance drawings (by Raphael and Michelangelo) to copies of Magna Carta, the Gutenberg Bible and the first folio of Shakespeare, the papers of seven Prime Ministers and of writers such as JRR Tolkien and John le Carré, many of these materials are preserved in the Oxford GLAM institutions on behalf of the nation, through explicit allocation decisions made by government, having been designated as being of pre-eminent significance for the cultural heritage of Britain.

Your colleagues operate at the very highest level of their profession, and are held in high esteem by all within GLAM. They have formed close and strong working relationships and are familiar with the buildings and the intricacies and peculiarities of them. They have responded to fire alarms, flooding and other challenges with the speed and effectiveness consistent with the highest levels of the UK fire service. The current proximity to the key buildings must be a critical factor in enabling not only swift responses but also such close connections between individuals that this proximity has afforded allows your colleagues to know and understand vital site-specific issues connected to these buildings.

My colleagues, the Directors of other GLAM sites, are also responding to your consultation, but on behalf of the GLAM group, and the Bodleian Libraries in particular, I welcome the opportunity to discuss these issues in person, and to consider in detail the issues which we feel are of critical concern arising from your plans. Emergency response times are a major concern, but so too are the deep and sustained knowledge of local sights and site-specific conditions, and the risks associated with the collections and buildings of national and international pre-eminence.

Yours sincerely,

Richard Ovenden

Richard Ovenden
Bodley's Librarian & the Helen Hamlyn Director of the University Libraries

Response from Layla Moran MP Member of Parliament for Oxford West & Abingdon 29th January 2026

Thank you for the opportunity to respond to the county-wide consultation on the future arrangements for Oxfordshire Fire & Rescue Service. I welcome the Council's proactive review to ensure that resources are aligned with local needs, particularly following the difficulties in recruiting and retaining on-call firefighters and the resulting daytime availability challenges. We must also recognise that the demands on the Fire and Rescue Service have changed over the years.

I fully support strengthening fire prevention and protection across all communities. Effective outreach, education in schools, fire safety inspections, and locally tailored campaigns should remain central pillars of fire prevention and safety awareness. Any resource reallocation must safeguard these vital services.

I want to thank Oxfordshire Country Council for listening to feedback and extending the deadline for response to the consultation to the 31st January.

Constituents have raised a number of concerns with me including:

- The quality of this consultation. Constituents have commented that the survey is poorly drafted

- The protection of Oxford City Centre's heritage assets and the impact of the proposed changes to the speed of response to this area – this is particularly highlighted by the recent fire at Mansfield College where the swift response from the Fire Service saved the building from more significant and widespread damage
- The potential impact on nighttime speed of response to residents in Botley and the surrounding villages should cover be reduced
- The proposal to reduce crew numbers on engines
- The potential loss of Kidlington's Rescue Tender and the lack of any proposal as to how the specialist rescue service would operate in the future. This has raised concerns that this important part of the proposals has not been consulted on
- A view that these proposals are being put forward to cut costs

I welcome the Council's commitment to consultation and transparency. I encourage continued engagement with residents, staff, and representative bodies to ensure that final decisions balance operational efficiency with community confidence.
Thank you again for your work on this important matter. I look forward to reviewing the outcomes of the consultation and the next steps.

Wolvercote Neighbourhood Forum (WNF)

Wolvercote Neighbourhood Forum (WNF) represents all residents of a large area at the northern end of Oxford city, stretching across from the River Thames to Cutteslowe Park – it is the former Oxford City Wolvercote Ward. Its status rests on the Wolvercote Neighbourhood Plan, which is a plan for the area approved overwhelmingly by local referendum in May 2021, and finally made by Oxford City Council.

Comments in response to Oxfordshire County Council's consultation on changes to Oxfordshire Fire and Rescue Service

The WNF Steering Committee has considered the documents provided by OFRS, and offers the following comments on the proposals for changes to the fire and rescue service, on behalf of the Forum. There are features we agree with, but we also have concerns.
1. One proposed change, in particular, would affect our Wolvercote Neighbourhood forum area: the move from having fire stations at Rewley Rd and in Kidlington to forming a joint fire station 'toward the north of Oxford'. More detail has not been provided, but in view of the lack of space elsewhere, we assume this means within the WNF area, at Oxford North or nearby at Peartree. Both would provide easy access to main roads A40, A44 and A34, and thereby avoid congestion within Oxford city, unless attending an incident within the city. We recognise there would be some noise nuisance from fire engines' sirens when they are on call at night, but these roads are already blighted by frequent sirens from ambulances, so we expect our residents living near these roads not to be unduly worse affected. At the same time, all parts of our area would benefit

from faster responses from fire engines when needed, and obviously we welcome that. 2. Our WNF area contains two waterways, the river Thames and the Oxford canal, with a third (river Cherwell) along its perimeter. Therefore we are most concerned by the lack of assurance in the proposals that there will continue to be adequate resources for rescue from water. The proposals include removal of the specialist rescue vehicle currently based in Kidlington, but with only a vague promise to 'review how we deliver specialist rescue services using other fire engines'. In our view, rescue from water is such a critical necessity not only for our area and Oxford City generally, but for the whole county, that the proposals should have included a concrete plan for how this facility will be retained. 3. At present, large parts of Oxfordshire are clearly less well served than they could be, because so many fire stations are overly dependent on on-call firefighters during the day, when there is a severe shortage of these in some places. It is wasteful of resources to maintain fire engines that are vulnerable to being unable to be crewed during daytime, because of a shortage of on-call firefighters. For this reason we support the proposal to change the five fire stations spread widely across Oxfordshire at Wallingford (or Crowmarsh), Bicester, Chipping Norton,

Witney and Faringdon to full-time crews during daytime.

Similarly, we understand the proposal to close fire stations at Eynsham, Henley and Woodstock, which find it difficult to recruit daytime on-call firefighters, but are sufficiently close to other fire stations that their locality, with the other changes being proposed, would actually see an improvement in provision, according to the Response Time maps provided. In fact, we are pleased to see these maps show the changes proposed would cause improvement (i.e. reduction) of response times across almost the entirety of Oxfordshire. 5. The Response Time maps show clearly that the area predicted to suffer worst in the entire county, with the largest increase in response times, is to the south-east of Oxford city centre, in the vicinity of Cowley Road: a densely populated part of Oxford. We find this both concerning and surprising, because it is in the area of the city currently served by Slade Park fire station (according to Figure 2 of the report), which is not proposed to change. It is unsatisfactory that the report fails to explain this consequence of the proposals, and how it will be mitigated. 6. It is very clear from press coverage of the proposals and the response of many firefighters, including the national FBU, that the proposals have not been developed in engagement with, and with support from, many OFRS employees. Another weakness of the report is that it does not explain in any detail the expected impact on staff of the service, in terms of numbers of redundancies and needs to move home etc. There are only vague references to this such as 'some firefighters could face redundancy'. In our view, this is disrespectful of OFRS towards its employees. For Oxfordshire residents reading the report, an important factor in reviewing the proposals will naturally be their expected impact on wellbeing of firefighters themselves, but this seems not to have been considered. In our opinion, the proposals should be revised, to correct the defects

identified in paragraphs 2, 5 and 6 above.

University of Oxford

Subject: Response to the Oxfordshire Fire and Rescue Service Consultation I am writing on behalf of the University of Oxford in response to the Oxfordshire Fire and Rescue Service (OFRS) consultation on proposed changes to fire cover across the county. We have separately submitted an electronic response to the consultation.
The University recognises the scale and complexity of the challenges facing OFRS, including recruitment and retention of on-call firefighters and the need to ensure long-term sustainability of the service. We acknowledge the stated ambition to improve response times across Oxfordshire as a whole; however, having carefully reviewed the consultation document, supporting evidence, and the Final Modelling Report, the University opposes a number of the proposals, particularly where they relate to Oxford city.

Impact on Oxford City and the University Estate The modelling data demonstrates that Oxford city already experiences the highest concentration of incidents by area. It is also the most densely populated part of the county and contains the greatest concentration of listed buildings, heritage assets, museums, and higher-risk laboratory buildings, notably within the Science Area. Despite this, the proposals would reduce the number of fire engines in the city centre and relocate the remaining city resource to a site in North Oxford. The Response Time Maps show that this would result in a significant increase in response times to the very areas where risk is highest. In some cases, response times to central Oxford locations may double in comparison to current attendance times, materially increasing risk to life, irreplaceable heritage assets, and internationally significant research activity. As custodians of many of Oxford's most iconic buildings, we cannot support proposals that would knowingly extend response times to incidents occurring on our estate.

Resources, Risk, and Community Safety

The consultation sets out three key principles, including matching resources to risk and improving community safety. Based on the data provided, the University does not believe these principles are met in respect of Oxford city.

Reducing resources in the area with the highest incident demand, highest population density, and greatest concentration of vulnerable buildings is inconsistent with a risk-based approach. The proposals would significantly diminish the prevention and protection activity that currently underpins community safety in Oxford.

The University currently benefits from strong, well-established working relationships with the crews based at Rewley Road and The Slade. These crews play a vital role in site-specific risk information, fire safety advice, and joint training exercises across our estate. Under the proposed model, fewer firefighters would be available to undertake this work, with remaining crews expected to cover a much wider geographical area following the proposed closure of several on-call stations. This would inevitably reduce

engagement, undermine prevention activity, and weaken community safety outcomes in the city.

Alternative Opportunities

The University is concerned that insufficient attention has been given to call-handling times. The consultation data shows average call-handling times in excess of one minute and thirty seconds, a significant increase since the introduction of the Thames Valley Fire Control Service. Addressing this element of the response chain offers a clear opportunity to reduce overall response times without withdrawing resources from high-risk areas such as Oxford city.

Similarly, the University asks for further to improve on-call firefighter recruitment and retention. Recent changes to on-call pay arrangements, expected housing growth across the county, and the absence of a dedicated professional recruitment function suggest that alternative options have not yet been fully explored. We strongly encourage further investment in this area before irreversible decisions on station closures and resource withdrawal are made.

Conclusion

The University holds particularly strong concerns about:

- the relocation of the city fire station from Rewley Road to North Oxford;
- the reduction of wholetime fire engines in the city centre;
- the proposed closure of Kidlington, Woodstock, and Eynsham fire stations where this directly enables the removal of city resources; and
- the disbandment of the specialist rescue capability currently based at Kidlington.

While we recognise that some proposals elsewhere in the county may deliver local benefits, the cumulative effect of these changes would be a significant reduction in resilience, response capability, and firefighter safety in Oxford city.

The University of Oxford does not support proposals that would increase response times to the city centre, reduce prevention and protection activity, and withdraw resources from the area of highest risk in order to achieve marginal improvements elsewhere in the county. We believe there are credible alternative approaches that should be fully explored, including improvements to call handling, investment in on-call recruitment, and consideration of alternative city-centre station locations that could deliver savings without compromising public safety.

We would welcome further engagement with the Council and OFRS to explore these options constructively.

Yours sincerely,

Gillian Aitken CB
The Registrar
University of Oxford

Thrupp Canal Cruising Club.

Dear Sir.

Please accept the following response from Thrupp Canal Cruising Club (TCCC) to your consultation document on the Fire and Rescue Service Re-organisation.

TCCC confines its comments to the proposal to take out of service the specialist Rescue Vehicle currently based in Kidlington. We have strong reservations about removing this highly skilled service from Oxfordshire, particularly as concerns their water rescue role. With so many waterways and bodies of water within the county, some used for boating, such as the Oxford Canal, River Thames, Farmoor Reservoir, and rivers used for fishing and swimming, it seems to us that downgrading this service will ultimately result in tragedy. This is an increasing likelihood given the significant rise in flooding events we are now experiencing as a result of higher winter rainfall and associated flooding. TCCC therefore opposes this one aspect of the proposed Service Reform and would urge the Fire and Rescue Service to relocate the specialist vehicle to an appropriate central fire station rather than dispense with it altogether.

Yours faithfully,

Geoff Branner

Secretary, Thrupp Canal Cruising Club.

Woodstock Town Council

This paper is submitted by Woodstock Town Council to support that motion and is the Council's response to the consultation on proposals to improve Oxfordshire Fire and Rescue Service (OFRS). We recognise the need to modernise services, improve prevention, support the workforce and ensure value for money. However, we believe it will not improve services to the towns and rural areas to the north and west of Oxford and **we are strongly opposed to proposals that would reduce local emergency cover through station closures, appliance reductions or crewing changes**.

In particular, **we oppose the proposed closures of the on-call fire stations at Woodstock and Eynsham, and we oppose any potential future closure or downgrading of Kidlington Fire Station.** Public safety must come first. We also oppose the closure of Henley Fire station, as suggested in the proposal.

1. Executive Summary

We oppose the proposed closures of Woodstock and Eynsham fire stations. We also oppose any potential closure or downgrading of Kidlington Fire Station.
We believe that:
County-wide **average response-time figures do not reflect local reality**; station closures will **increase risk for specific communities**.
Rural and 'urban fringe' areas will be disproportionately harmed by centralisation due to distance, road constraints, flooding and limited alternative cover. Climate

change (storms, floods, wildfires, heatwaves) and rapid housing growth mean Oxfordshire needs stronger local response capacity, not less.
Recruitment and retention challenges in on-call services should be tackled through targeted investment, training and employer engagement—not by closing stations. **We request publication of transparent, locality-level modelling, including 'worst-case' and 'peak demand' scenarios, and an open and inclusive debate about what could be done to improve services with contributions from all sides, (including the FBU and ordinary firefighters) before any decisions are made**.

Our Core Objection: Closures Reduce Resilience and Increase Risk

It shouldn't need stating that fire and rescue incidents are time critical. Small changes to 'average' response times can mask substantial changes in the distribution of response times for particular places and at particular times of day (e.g., peak traffic, major events, severe weather, simultaneous Woodstock Town Council Response 19/01/2026 pg. 2 incidents). Removing a local station reduces system resilience: when neighbouring stations are already committed, fallback cover comes from further away, compounding delays. **Concerns with Response-Time Modelling and Evidence Base**

The Council is concerned that headline claims about minimal county-wide impact can obscure the local impact on individual towns, villages and road corridors. Concerns have also been raised about reliance on modelling based on theoretical station locations. Operational experience suggests that real-world response times, availability of fully trained crews and access to specialist equipment are not adequately captured by county-wide averages. Decisions should therefore be informed by local operational evidence as well as modelling outputs. Woodstock Town Council asks for the following to be published (or clearly summarised) for each affected locality before a final decision is taken:

- Predicted response times at community level (not just county averages), including distribution (median, 90th percentile) and worst-case scenarios.
- Separate analysis for different incident types (dwelling fires, RTCs, flooding/water rescue, wildfire/grassfire, hazardous materials).
- Scenarios that reflect peak traffic, road closures, major events, flooding events and simultaneous incidents.
- How cover will be assured when neighbouring stations are already mobilised.
- Equalities and rural-impact assessment: which communities face the greatest increase in risk.

4.Station-by-Station Impacts

The following sections set out why **the proposed closures of Woodstock and Eynsham fire stations and any potential future closure or downgrading or closure of Kidlington fire station are unacceptable.**

4.1 Woodstock Fire Station – Proposed Closure (Opposed)

Woodstock sits at the intersection of market-town, rural and visitor economy risks. The area includes major visitor flows (especially when there are major events), heritage assets and surrounding villages. Closure would increase reliance on more distant stations and reduce local resilience, particularly during peak tourism, major events and severe weather. Woodstock Fire Station is a community fire station, recruiting staff locally and working in close collaboration with the Thames Valley Police's Woodstock Neighbourhood Policing Team on local issues such as dangerous parking.

- **Population in Woodstock and local villages is growing rapidly as more and more houses are built necessitating local service expansion rather than a reduction in local assets and staffing.**
- Woodstock's visitor economy and seasonal peaks require resilient local emergency cover.
- **Surrounding villages could experience longer response times if Woodstock Fire Station is closed.**
- **Road network constraints and congestion (especially major events at Blenheim Palace) can significantly affect mobilisation from more distant stations.**
- **Local crews provide valuable local knowledge and risk intelligence for heritage/visitor sites and rural properties**.

4.2 Eynsham Fire Station – Proposed Closure (Opposed)

Eynsham is a key service point for the north and western Oxford fringe and surrounding villages. It sits amid significant housing growth pressures (including the planned salt cross village), constrained Woodstock Town Council Response 19/01/2026 pg. 3

road links, and increasing flood and surface-water risk. Removing Eynsham's local capability would lengthen response times and reduce resilience when Oxford and Witney resources are committed.

- **Eynsham provides vital first response for a large population and surrounding villages, with very significant growth in households and businesses in the pipeline.**
- **Eynsham houses an ISU (Incident Support Unit) which carries specialized equipment like spare breathing apparatus (BA) cylinders, flooding response equipment, boarding materials, lighting, and a "snake eye" camera for incident support beyond their standard engine. The ISU is deployed to major incidents to provide extra resources and capabilities, including support for other crews. The closure of Eynsham Fire Station would mean that this time critical incident support equipment would be centralized resulting in delays in its deployment to more rural areas that lie to the north and west of Oxford City.**
- **Road congestion and highly constrained crossing points can materially delay appliances especially when they are coming from further afield.**

- **Increased flooding events and extreme weather are raising, and will continue to raise, demand for rescue and safety services.**
- **Closure of local fire stations and reductions in staffing levels would reduce local prevention and community engagement capacity (home and business safety visits, youth engagement, local risk intelligence).**

4.3 Kidlington Fire Station – Possible Closure/Downgrading (Opposed)

Kidlington Fire Station provides both local response and county-wide resilience. It serves a large and rapidly growing population, surrounding villages and major transport corridors, while supporting wider system resilience when Oxford-based resources are unavailable.

The station hosts a specialist rescue tender delivering a unique county-wide capability not replicated elsewhere in Oxfordshire. This combines specialist equipment with crews trained for complex and technically demanding rescues, including serious road traffic collisions and flooding incidents. Removal of this asset would represent a net loss of resilience rather than an improvement.

Operational experience demonstrates that retaining co-located specialist equipment and trained crews improves outcomes by ensuring that the right resources arrive together. Dispersing specialist capability across multiple appliances risks fragmentation and delay during complex incidents.

Staffing considerations strengthen this case. Proposed shift changes and the loss of tied accommodation for on-call firefighters associated with Kidlington would likely reduce night-time availability, increase response times and compound risks identified elsewhere in this response. Direct engagement with firefighters indicates that proposed changes to shift patterns and crewing levels risk reducing on-call availability, particularly at night. The introduction of extended shifts may prevent some full-time firefighters from continuing on-call duties due to working-time regulations, further weakening cover during critical periods.

Concerns have also been raised about reliance on modelling based on theoretical station locations. Operational experience suggests that real-world response times, availability of trained crews and access to specialist equipment are not adequately captured by county-wide averages. Decisions should therefore be informed by local operational evidence as well as modelling outputs. Woodstock Town Council Response 19/01/2026 pg. 4

5. On-call Firefighters: Solve the Staffing Problem—Don’t Close Stations

The Council recognises the challenges with on-call availability and recruitment. However, closing fire stations and reducing staffing does not resolve the underlying causes of service pressure. It simply moves the risk elsewhere—onto neighbouring stations, onto already stretched crews, and ultimately onto residents who potentially face longer response times and reduced protection in emergencies. Instead, the

Council ask OFRS and Oxfordshire County Council to develop and adopt a properly funded targeted on-call strengthening plan.

At this point in time, both Woodstock and Eynsham fire stations each have more than a dozen on-call fire-fighters. The shortages are not of staff, but of fully trained staff, with specific competencies. Before a fire engine can be deployed there must be a minimum of four crew members on board. Furthermore the crew of four must include a qualified driver and a Crew Commander (or higher) to lead the response, plus at least two of the firefighters must be trained in wearing breathing apparatus. Although there appears to be sufficient on-call fire-fighters at both Eynsham and Woodstock, deployment is often delayed due to lack of fire-fighters that are trained in the required competencies. The Council understands that this is due to insufficient training resources and funding.

Woodstock Town Council suggests that staffing issues should be addressed by:

- **Improved employer engagement: agreements with local employers to support on-call availability (including public sector bodies and major employers).**
- Fair and competitive remuneration and retention incentives.
- **Greater flexibility in duty systems, training, scheduling and standby arrangements.**
- **Increased funding for, and availability of, training in critical competencies.**
- **Local recruitment campaigns and pathways (including retained-to-fulltime progression).**
- Investment in stations as community hubs for prevention and recruitment.
- **Investment in on-call fire stations should be understood not merely as an operational expense, but as an investment in community capacity.**

Strengthening stations as local community hubs for prevention, training and recruitment helps address staffing challenges while reinforcing the social fabric that underpins successful on-call models.

Closing stations risks losing critical expertise and experience; permanently severing local ties, and making future recruitment harder rather than easier.

6. Climate Change, Growth and Future Risk Demand More Capacity, Not Less

Oxfordshire faces increasing climate-related incidents (storms, flooding, wildfires/grassfires, heat-related fires) alongside continued rapid housing growth and infrastructure strain. Fire and rescue is one of the cornerstones of community resilience. Reducing local presence, at this point in time, will increase vulnerability and the need for longer shifts which in turn will inevitably result in later emergency response and recovery.

This resilience requirement is further heightened by the proliferation of science parks, business parks and advanced research facilities across Oxfordshire, which introduce complex safety challenges including high fire loads, specialist laboratories, and potential biological or chemical hazards, all of which demand a well-resourced, locally

available fire and rescue service with appropriate training, equipment and rapid response capability. Woodstock Town Council Response 19/01/2026 pg. 5

7. Alternatives to Closure: A Safer Improvement Plan

We support service improvement, but propose alternatives that maintain local safety:

- Retain stations while rebalancing cover through targeted crewing improvements and recruitment and support.
- An expanded training programme to ensure that sufficient numbers of fire-fighters with critical competencies are available to all local fire stations.
- Create cross-station 'support pools' for peak periods rather than removing stations entirely.
- Enhance prevention and risk reduction (home safety, business engagement, storm and wildfire preparedness, flood planning).
- Invest in data transparency and local accountability, including regular published performance dashboards by area.
- Work with communities on station modernisation and shared facilities where appropriate, without loss of operational cover.

8. The Community-Building Value of Local Fire Stations – Especially On-Call and Volunteer-Based Services

Local fire stations, particularly those operating on an on-call or volunteer model, are far more than emergency response assets. They are deeply embedded community institutions that generate social capital, trust, skills and civic engagement in ways that cannot be replicated by centralised or distant services.

On-call fire stations draw their crews directly from the communities they serve. Firefighters are local residents, neighbours, parents, employees of local businesses and participants in local civic life. This creates a unique two-way relationship: communities trust their fire service because it is *of* the community, and firefighters have deep local knowledge, commitment and accountability that strengthens operational effectiveness.

Volunteer-based and on-call stations:

- Act as visible symbols of collective responsibility and mutual aid, reinforcing community cohesion.
- Provide local role models, particularly for young people, encouraging public service, teamwork and skills development.
- Support local prevention work, including home and business safety visits, school engagement, event safety planning and risk awareness.
- Serve as community hubs, supporting recruitment, training, resilience planning and partnership working with the police, town and parish councils, voluntary groups, charities and local community organisations.

- Strengthen day-to-day resilience, not just during major incidents but through continuous local presence and engagement.

The loss of a local fire station therefore represents not just a reduction in response capability, but the erosion of a vital layer of community infrastructure. Once dismantled, this social capital is extremely difficult — and often impossible — to rebuild.

9. Additional Consideration: Civil Defence and Strategic Resilience

In addition to the core arguments above, it is important to recognise the role of the Fire and Rescue Service as part of the UK's wider civil defence and emergency resilience framework. In the Woodstock Town Council Response 19/01/2026 pg. 6 unthinkable but plausible scenarios of a major terrorist incident, hostile attack, or prolonged national emergency, firefighters are central to life-saving response, building safety, hazardous materials management, evacuation support and multi-agency coordination alongside police, ambulance, local authorities and, where required, the armed forces. Oxfordshire's strategic context strengthens - rather than distracts from - the case for maintaining strong local fire cover. The county hosts nationally significant defence infrastructure, including RAF Brize Norton and RAF Benson, and supports major transport and logistics corridors. Civil defence planning in such contexts depends on proximity, redundancy and distributed local capacity. Closing fire stations and centralising response reduces surge capability and creates single points of failure, precisely when resilience depends on having multiple, locally available response assets.

Oxfordshire's strategic context is further reinforced by the presence of MoD Bicester, a major defence logistics and storage site involving vehicles, fuel and military equipment, where any serious incident would require an immediate, substantial fire and rescue response, underlining the importance of strong local fire cover. This supporting context reinforces the conclusion already reached elsewhere in this response: now is not the time to reduce local fire and rescue capacity. Strengthening everyday community safety also strengthens preparedness for exceptional events. Maintaining and strengthening local fire stations is therefore both a practical and responsible contribution to public safety and long-term resilience.

10. Our Requests and Recommendations

- Do not proceed with any decisions about closure of Woodstock or Eynsham fire stations without an open and inclusive debate about what could be done to improve services with contributions from all sides, (including the FBU and ordinary firefighters).
- Rule out closure or downgrading of Kidlington Fire Station.
- Publish locality-level modelling (including 90th percentile and worst-case response times) for each affected community.
- Publish an equalities and rural-impact assessment showing which communities bear increased risk.

- Adopt a properly funded on-call recruitment, and retention plan, including employer engagement.
- Increase funding for training in critical competencies.
- Commit to climate resilience planning and capacity building for storms, flooding and wildfire risk.

Overall Conclusions

Woodstock Town Council considers that the proposed fire station closures would not improve services for Woodstock or its surrounding communities. When taken alongside the potential closure or restructuring of Eynsham and Kidlington Fire Stations, **these proposals would materially undermine public safety and significantly reduce the resilience of the fire and rescue system across the area.**

Evidence collected from the Fire Stations demonstrates the importance of retaining local stations with specialist capabilities, stable staffing, local detailed knowledge and strong community integration. The Town's brave firefighters not only strengthen the resilience of the Town and Woodstock Town Council Response 19/01/2026 pg. 7 Blenheim Palace but also make a significant contribution to the wellbeing and cohesion of the community. Finally, in the context of accelerating climate change, rapid population growth resulting from new housing developments, the expansion of business and science parks, and increasing national and international security uncertainty, Oxfordshire should be strengthening and expanding its fire and rescue provision. Any proposal that risks reducing local capacity runs directly counter to the growing and foreseeable demands placed on the service.

Royal Berkshire Fire and Rescue Authority

Subject: Response to Oxfordshire Fire and Rescue Service Consultation

Royal Berkshire Fire and Rescue Authority welcomes the opportunity to respond to Oxfordshire Fire and Rescue Service's consultation on proposals to improve Oxfordshire Fire and Rescue Service. We recognise the importance of services keeping their operating models under review to ensure arrangements remain sustainable, effective, and aligned to evolving community risk. We are also mindful that changes of this nature can have wider consequences across borders, particularly within Thames Valley where operational resilience is closely interdependent. Having reviewed the proposals, the Authority's principal concern relates to Henley Fire Station and the proposal to close it. Our analysis indicates that Royal Berkshire Fire and Rescue Service already attend 66.4% of appliance mobilisations onto Henley's station ground, a significant proportion. This level of cross-border attendance places sustained operational pressure on our busiest station, Caversham Road in Reading. In practical terms, any reduction in Oxfordshire's local capability or availability around Henley is likely to increase both the frequency and duration of Royal Berkshire resources being deployed into Oxfordshire. Whilst we are committed to mutual aid and a resilient response to major and specialist incidents, we would like to ask Oxfordshire to set out

clearly how this proposal would be mitigated operationally and, in particular, to evidence the anticipated impact on neighbouring services, especially Royal Berkshire.

In this context, the Authority also notes that alternative options, aimed at improving availability in the Henley area rather than closing the station would return additional resource into a station ground that already experiences high levels of demand and would reduce the current reliance on Royal Berkshire's attendance. We appreciate the financial and workforce considerations inherent in such decisions, but we consider it important that the consultation explicitly assesses all options in terms of overall Thames Valley system resilience.

The implications for Caversham Road, and for Royal Berkshire's wider resilience, are particularly material. Caversham Road is our busiest station and hosts specialist capabilities, including water rescue and animal rescue. If reduced local availability in and around Henley results in increased cross-border demand, we would expect this to extract Caversham Road and potentially Wokingham Road, more frequently, with consequent impacts on cover and resilience across Royal Berkshire. Increased extraction also carries a direct risk to our ability to maintain our own response standards, particularly at times of peak demand. In relation to specialist capabilities, when these assets are deployed cross-border, the appliance and crew, most notably from Caversham Road, are committed for the full duration of the incident. The effect of this is that the specialist capability is taken off the run for Berkshire during that period. This reduces resilience within our own area, particularly the rescue capability for the River Thames and increases the likelihood of secondary extractions, diminished cover, and longer response times for incidents elsewhere in Royal Berkshire and Oxfordshire. More broadly, we are concerned about the cumulative effect that increased cross-border extraction could have on productivity e.g. specialist capability and readiness. Over time, higher rates of cross-border activity risk constraining training time, skills maintenance, and readiness, each of which has direct implications for our own risk profile and resilience. We would therefore welcome clarity on how Oxfordshire intends to ensure that the proposed changes do not, indirectly, reduce the availability and effectiveness of specialist capability across Thames Valley as a whole.

We have also considered the proposals relating to Wallingford and the potential move to Crowmarsh Gifford. From Royal Berkshire's perspective, whether the station remains in Wallingford or relocates to Crowmarsh Gifford is unlikely to materially change the crossborder impact, as both options sit on the same risk footprint in relation to Henley's station ground. For completeness, the Authority has no significant concerns with the majority of proposals set out within the consultation, including Wholetime Duty System conversions elsewhere and the position relating to Faringdon. We recognise the potential benefit of increased daytime availability across the Thames Valley where this improves system-wide resilience. We would, however, welcome being kept informed of any further review of specialist rescue capabilities arising from the proposed consolidation at Kidlington, so that any changes are understood, risk-assessed, and coordinated across neighbouring services where appropriate.

Finally, we consider it important that this consultation is viewed in the wider Thames Valley context. The Authority notes that Buckinghamshire's current proposals may compound cross-border pressures; for example, potential changes affecting on-call appliances in locations such as Beaconsfield and Stokenchurch. The combined effect of changes across the three services could increase demand on Royal Berkshire without equivalent mitigation. We would therefore encourage Oxfordshire to take a system-wide approach to evaluating cumulative impact, and to set out how cross-border effects will be monitored and managed jointly with neighbouring services should proposals proceed.

Royal Berkshire remains committed to constructive collaboration with Oxfordshire. We would welcome further engagement to review cross-border demand modelling (including assumptions on availability and mobilisation), to understand proposed mitigations should the Henley closure proceed, and to agree appropriate governance and monitoring arrangements to track cross-border impacts after implementation. We would also be content to share relevant incident and mobilisation data to support this work, and to help ensure that consultation outcomes are evidence-based, transparent, and aligned to the shared resilience needs of Thames Valley communities.

Yours faithfully,

Councillor Jeff Brooks Wayne Bowcock

Chair, Royal Berkshire Fire Authority Chief Fire Officer,

Cherwell District Council

Re: Consultation on Proposals to Improve Oxfordshire Fire and Rescue Service

Dear Sir/Madam,

Cherwell District Council welcomes the opportunity to comment on the consultation concerning proposed changes to Oxfordshire Fire and Rescue Service. We appreciate the detailed analysis provided and recognise the operational challenges that have prompted this review—particularly the continued difficulties in recruiting and retaining on-call firefighters and ensuring resilient daytime fire engine availability.

We understand the intention behind the proposed changes and the desire to align resources more closely with risk, improve response resilience, and secure long-term sustainability. The Council acknowledges the importance of continuous improvement and the pressures that all public sector organisations must contend with.

However, while the Council supports the principle of modernisation, we have several significant concerns regarding the impact of the proposals on Cherwell district, our local communities, and on the wider strategic context in which these decisions are being made.

Local Identity, Visibility, and Community Connections

Cherwell District Council remains concerned about the effect of any reduction in locally based fire provision. Fire stations in our communities play an essential preventative, educational, and confidence-building role. They are trusted, visible assets that help maintain strong community identity and public assurance.

Any proposals involving closure, merger, reductions in full-time staffing, or changes to shift patterns risk eroding essential community connections and may undermine public confidence, even where modelling forecasts only marginal response-time changes.

Position of Cherwell District Council – Full Council Motion

Following a motion agreed by Full Council, please note the Council's formal position is as follows:

Council believes:

- Closing and merging stations could increase average response times, when Oxfordshire Fire and Rescue Service's response times are already significantly longer than the national average.
- The loss of four full-time firefighter positions in Banbury and the implementation of 12-hour shifts at Bicester could have a detrimental impact on public safety in Cherwell.
- Decisions on fire service changes must prioritise public safety above financial or administrative considerations.

Council therefore resolves to:

- Support residents and firefighters in Oxfordshire by making clear our opposition to the reduction in firefighter numbers, the implementation of 12-hour shifts, and the merger of Kidlington and Rewley Road Fire Stations.

Timing of Proposed Changes – Governance Stability and Strategic Uncertainty

The consultation documents highlight that the need for change has been apparent since 2023. While we recognise the need to respond to operational pressures, Cherwell District Council has concerns about implementing significant structural reforms at a time of ongoing uncertainty around the forthcoming mayoral strategic authority. The precise responsibilities, governance arrangements, and implications for fire and rescue services have not yet been confirmed, meaning that major decisions taken now may need revisiting once the new authority's powers and responsibilities are clarified.

Additionally, possible Local Government Reorganisation (LGR) changes introduce further uncertainty about future boundaries and responsibilities. Introducing wholescale change before the wider governance landscape settles risks misalignment, duplication of effort, or reduced effectiveness.

While continuous improvement is important, we believe it would be prudent to avoid large-scale structural change until there is greater clarity about the future governance structures.

Key Principles and the Need for Broader Considerations

Cherwell District Council recognises the key principles behind the proposed changes, aligning resources to risk, improving resilience, and ensuring long-term sustainability. These are sensible and important foundations. The role of fire stations as core hubs for community focus, safety and prevention work. The cumulative impact of multiple changes on staff morale, recruitment, and retention. Understands the operational challenges but has concerns about the local impacts of the proposed changes. Opposes reductions in firefighter numbers, the introduction of 12-hour shifts, and the proposed merger of Kidlington and Rewley Road stations. Stresses that public safety must be prioritised above financial efficiency or estate rationalisation. Believes that large-scale change should be deferred until greater clarity exists regarding the mayoral authority and any potential LGR outcomes. Encourages broader consideration of socio-economic, community, and workforce impacts not fully reflected in the consultation documentation.

However, the Council believes that additional considerations could have been included, such as:

Cherwell District Council's Summary Position

In summary, Cherwell District Council:

Conclusion

Cherwell District Council remains committed to supporting a resilient, trusted, and community-embedded fire and rescue service. We ask that Oxfordshire County Council proceed with caution, ensuring that any changes safeguard public confidence, protect local identity, and remain fully aligned with the evolving strategic landscape. We appreciate the opportunity to respond and look forward to continued constructive engagement.

Yours faithfully,

Tim Hughes
Head of Regulatory Services and Community Safety
On behalf of Cherwell District Council

Cllr Carl Rylett, West Oxfordshire District Council, Eynsham Parish Council

As a representative of Eynsham at both parish and district level I have had the opportunity to meet the Chief Fire Officer and ask questions, and contributed to the response from WODC's Overview and Scrutiny Committee, so will stick to just the comments below

Shortcomings of consultation: As a data analyst by trade, I would echo the comments of those who have said the data has not been presented clearly. I appreciate the providing of a large quantity of information, but for those without the many hours needed to go through the details, a clear summary of the most meaningful insights of the data would have been helpful. As an example, it is not clear about the impact on response times to Eynsham village of the changes, which surely must be understood clearly before any decision is made. In addition, a major flaw of the consultation is a lack of alternative options and assessment of impact of each. Eynsham Station Response Times: The local Eynsham firefighters have given a compelling story about how they could be able to improve availability, and are already doing so. Given the new context of the threat of losing the station, I think it highly likely that villagers and local businesses would respond positively to a recruitment campaign to help keep the station open. Appropriate time should be given to allow this to happen, which if successful would allow Eynsham station to play a positive role in the improvement of Oxfordshire's Fire and Rescue Service

Regards
Cllr Carl Rylett

Chipping Norton Town Council

Ref: CHIPPING NORTON TOWN COUNCIL RESPONSE TO THE 'CONSULTATION ON PROPOSALS TO IMPROVE OXFORDSHIRE FIRE AND RESCUE SERVICE'

Chipping Norton Town Council is opposed to the changes proposed to the Oxfordshire Fire and Rescue Service set out in the Oxfordshire County Council/Oxfordshire Fire and Rescue Service Consultation Document.

We join with our colleagues in other Councils across Oxfordshire in calling for them to be withdrawn.

RATIONALE AND REASONS FOR OUR DECISION

1 IMPACTS AS IDENTIFIED BY OCC/OFRS IN THEIR DOCUMENT

- 'Fewer Fire Engines available at night'
- 'Lower morale'
- 'Possible job losses'
- 'Slight delay in second fire engine at night'
- 'Slight increase in response times in Oxford'

2 IMPACTS AS IDENTIFIED BY THE FIRE BRIGADES UNION

- 'Close Five Fire Stations' - Eynsham, Woodstock and Henley plus merge Rewley Road in Oxford and Kidlington'

- 'Remove Six Fire Engines - one from Henley, Thame, Eynsham, Woodstock, plus two from Rewley Road
- 'Cut 42 Firefighters'
- 'Force crews to unsafe 12-hour Shifts
- 'Remove a Specialist Rescue Vehicle from Kidlington Fire Station'

3 FLAWS IN THE MAIN PROPOSAL TO CREATE FIVE DAY SHIFT FIRE STATIONS

The main proposal suggests turning five currently on-call fire stations at Bicester, Chipping Norton, Faringdon, Wallingford and Witney implementing 12-hour day shifts and replacing current on-call crews with full-time firefighters in the day whilst hoping to cover nights with an on-call crew.

- It states that most incidents occur during the day. THIS IS NOT THE CASE IN CHIPPING NORTON. Here we have a slightly higher number of incidents at night. Currently 52% at night; 48% in the day. Incidents which occur at night are much more dangerous. OUR COMMUNITY MUST HAVE GUARANTEED NIGHT COVER WHICH IS EQUAL TO OR BETTER THAN WE HAVE NOW. THIS NOT GUARANTEED IN THE CONSULTATION DOCUMENT. 4 IMPACTS ON CHIPPING NORTON • Introducing full-time 12-hour shifts on days will mean that 50% OF OUR CURRENT ON-CALL CREW WILL LOSE THEIR JOBS. The proposals would mean redundancy for those members of our On-Call crew who only give day cover.
- This would have a knock-on effect for nighttime cover for Chipping Norton because these firefighters that cover the day also assist in providing night cover.
- Without them THERE WOULD BE NO GUARANTEED FIRE COVER BASED IN CHIPPING NORTON OVERNIGHT to crew our Fire Engine.
- The closest guaranteed appliance would come from Banbury. This would mean a much longer response time to incidents. We consider this to be dangerous and create greater risk to life and property in our community.
- We would see the break-up and loss of our dedicated and highly trained and motivated local crew who have years of experience and invaluable local knowledge.
- The proposals state that Whole Time Day Cover would allow for 'more community activities to take place'. This is not true for Chipping Norton. The authors of the report clearly have no knowledge of the huge amount of community engagement that our crew are involved in every year from school visits to station Open Day's and visits, to Safety and Well Being visits to the vulnerable, to attending many community events such as fetes, Pride and the Remembrance Day Parade.
- There is a very strong bond between our On-Call Crew and our Town and the surrounding villages. They are hugely valued members of our Community. We view the proposals as threatening that valued and irreplaceable link and strong bond.

IN CONCLUSION

It is for all these reasons that Chipping Norton Town Council opposes the current proposals and calls for them to be withdrawn. We believe that they are dangerous and are not a solution to any of the challenges faced by OCC and OFRS in providing safe and reliable Fire and Rescue Services in Oxfordshire.

Yours sincerely,
Katherine
On behalf of Chipping Norton Town Council

Eynsham Parish Council

Dear Sir

I would like to submit my response to your consultation via this email. I found responding to the survey tedious because it expects me to respond to all aspects and takes far too long

I'd like to strongly object to the closure of the Eynsham Fire Service for the following reasons

1. The residents of Eynsham will always be better served by an on-call fire station within the parish rather then engines from Witney or Kidlington. By closing our station, you are increasing the risk to our residents and their property. The Eynsham crew will respond in 6 minutes, an on-call engine from Witney could be 15-20 mins. That put lives at risk and is not acceptable
2. The selection of Eynsham for closure is fundamentally flawed. It's based on out of date information gathered during a period of high staff turnover. With new recruits in place the performance has significantly improved and it would be unfair to close the station based on past performance and not current performance
3. You have not given the fire station and the community of Eynsham fair opportunity to respond to low performance figures. The residents have been unawares that this was an issue and have been denied an opportunity to support.
4. Similarly the local business community who benefit from the close proximity of the fire station. They were unawares of the situation and could assist in finding an supporting new fire fighters
5. The parish of Eynsham is expanding rapidly, the number of homes is set to more than double over the next 10-15 years. That brings with it more demand for the fire service but also clear opportunity to recruit more on call fire fighters
6. Its short-sighted planning to remove a critical piece of infrastructure that is in good order. Once closed it can never be replaced
7. The key driver of these proposals is increase safety and not cost savings. I fail to see how closing the Eynsham Station plus 2 more and making 42 firefighter redundant will achieve this. I urge you to reconsider your proposal and retain Eynsham fire

station. I have not responded on the other aspects of the proposal as these areless impactful on Eynsham and would require significant further research to fully understand and respond constructively

Regards
Ross
Ross Macken
Chair, Eynsham Parish Council

Northamptonshire Fire and Rescue Service

RE: Consultation on Improving our Fire and Rescue Service

Thank you for engaging us as a key stakeholder in the *Improving our Fire and Rescue Service* operating model consultation. We appreciate the opportunity to review the proposals and to contribute to the development of a future model that supports resilient, efficient and community-focused fire and rescue services across Oxfordshire and the wider region.

We recognise the significant challenges facing Fire and Rescue Services nationally, including population growth, increasingly complex demand, workforce pressures and financial constraints. In this context, the ambition to better align resources to risk while strengthening prevention and protection activity is both appropriate and timely.

Having reviewed the summary proposals, we would like to offer the following strategic observations for consideration and continued dialogue:

Bicester Changes | We think adding day-crewed wholetime cover at Bicester is a positive step. It is close to our border and should help reduce daytime requests for support from Northamptonshire. **Night-Time Cover |** We are a little concerned about night-time resilience relying more on on-call crews, especially as availability has been dropping over time. If this becomes a bigger issue, we would welcome early conversations so we can plan together.

Specialist Rescue | Kidlington has often supported us with specialist rescues. With the planned merger and redistribution of these skills, we would like to know where these capabilities will sit in future and what that means for response times.

Overall Appliance Numbers | Reducing the fleet from 34 to 28 engines is understandable given the pressures you face, but it could affect mutual aid during major incidents or spate conditions. We would like to keep working together to manage resilience.

Prevention and Protection Work | We are pleased to see the focus on prevention and protection. There is a real opportunity for joint work in areas near the border, like Bicester and Banbury.

Thanks again for involving us. We look forward to continuing to work closely with you to keep our communities safe.

Yours sincerely

Nikki Watson QPM
Chief Fire Officer

Cllr Gareth Epps, Deddington Division, Oxfordshire County Council

I thought I should write formally to follow up some of the issues that were raised with Cllr Gordon and I in relation to the Cover Model proposals as they affect Kidlington specifically.

It is useful to see this in the context of the representations made by FBU reps at JCC on Friday.

Crew changes from 7-5 to 6-4

First, having seen FBU material on social media in the Banbury area, it was suggested that this was a new change to terms and conditions. I now understand the situation to be that this change has been agreed as part of a previous negotiation, but is currently only in place in Abingdon and Didcot. The changes would extend this to Kidlington (and Banbury and other locations). Crews have concern that this leads to a dependence on overtime for cover to keep engines active due to sickness etc. Coupled with rest requirements and the additional limitations of 12 hour shifts, capacity for this will lead to resilience challenges.

[There's clear unhappiness about 12 hour shifts, particularly from those with family responsibilities]

There is localised concern about the proposed withdrawal of the rescue tender and the specialisms required to retain its functions, both in terms of the physical assets (non-standard equipment to be transported) and staff training required.

Of a direct and human need is that of clarity and certainty with regard to timescales for those currently in tied accommodation. Decisions about school choices and future employment will be among those people will need to make. At the very least, it would be helpful to clarify what is the earliest point at which the accommodation might be taken back, should the proposed merger of Kidlington and Rewley Road stations go ahead. With no location yet confirmed (although one must have been identified for the modelling) and the need for funding, design and construction, realistically it is unlikely to impact officers' living arrangements before 2029. It would be a sign of good faith and also of support for crew well-being if a form of words could be shared on that basis.

There is a concern that the consultation outcomes would be presented at the January Cabinet, just a couple of days after the consultation closes. For many reasons, I hope this is not the case.

There's clearly a concern that when further information is requested as part of the consultation, the response is characterised as: "we haven't got the details". While

clearly there are aspects of these plans that require further work, anything that can be done to counter that characterisation would be well received.

There are concerns as to how major incidents requiring multiple crews - Blenheim Palace, the illegal waste dump near Kidlington, but also potential incidents in one of Oxford's many heritage assets - might be covered in the event of the closure of Rewley Road.

Overall (and I would like to better understand the views of retained fire crew in Deddington and elsewhere), it would be helpful if the County Council were seen to pause and reflect once the consultation is complete. While I see no need to abandon it halfway through as the FBU and Cllr Lygo have demanded, there is clearly a need to ensure staff are supported, reassured and happy to continue in their roles.

Laura may have other questions about issues raised which I'd forgotten.

Cllr Gareth Epps
Liberal Democrat
Deddington Division

Witney Town Council

Witney Town Council Response to Oxfordshire County Council's

Consultation on Proposals to Improve Oxfordshire's Fire & Rescue Service

Witney Town Council is concerned about the potential impacts of these proposed changes to Oxfordshire Fire and Rescue Service, particularly the proposed closures of Eynsham and Woodstock fire stations. The Council considers that these closures would have a direct and adverse impact on emergency response provision in Witney and across West Oxfordshire.

The Town Council is concerned that meaningful engagement with frontline staff did not take place at an early stage of the proposals. It is noted that staff have disputed the data used to justify the changes, and it believes this raises significant concerns regarding the robustness of the evidence base.

Witney Town Council is also concerned that the proposed restructuring would make the recruitment and retention of on-call (retained) firefighters more difficult. This risks weakening the service's resilience at a time when a more supportive and sustainable structure is needed to ensure effective cover.

While the Town Council recognises that the proposals may bring some benefit to Witney through an increase in full-time firefighter provision, this appears to be at the detriment of neighbouring areas. The Council is particularly concerned about night-time cover and the overall availability of fire engines across West Oxfordshire as a whole, which could reduce the service's ability to respond effectively to incidents.

There are additional concerns regarding the potential impact on other services provided by the fire and rescue service, including responses to road traffic collisions and assistance during flooding incidents. Flooding is a particular concern in Witney, which

has experienced significant issues over the past decade and is expected to remain vulnerable in the coming years. This raises questions about whether the fire service will continue to be able to provide timely support for pumping operations and recovery efforts.

Furthermore, the Town Council notes that there is substantial large-scale residential development planned and already underway across the district. On the outskirts of Witney alone, this amounts to more than 3,500 new homes. The Council seeks reassurance that the increased demand this will place on fire and rescue services has been fully taken into account, as long-term service capacity and sustainability are key concerns.

In summary, Witney Town Council urges Oxfordshire County Council to reconsider the proposed changes, engage more fully with staff, and ensure that future provision is based on robust data, supports recruitment and retention, and delivers a resilient, sustainable service for Witney and the wider West Oxfordshire area.

Town Hall, Market Square
Witney, OX28 6AG
Tel: 01993 704379
E-mail: info@witney-tc.gov.uk
Mrs Sharon Groth Assoc.CIPD FSLCC FCMI
Town Clerk
Cllr Andy Bailey
Mayor of Witney

Harwell Parish Council

Overview

Harwell Parish Council welcomes the opportunity to comment on the proposals to

modernise and strengthen Oxfordshire Fire & Rescue Service (OFRS). Our response focuses only on the implications for residents of Harwell parish and the wider Didcot/Science Vale area, where rapid population growth, major employment sites, and complex transport networks present particular risks.

While the consultation identifies pressures on the service, the Council is not persuaded that the proposed changes demonstrate that local response times or community safety will be maintained. Quick, reliable action remains fundamental to saving lives, and any changes must clearly show that risk will not increase.

Residents expect transparent processes and clear communication when changes to emergency response capability are being considered. Recent experience of county level consultation has not provided the level of transparency or trust that residents deserve.

2. Main Proposal – Creating Five Day-Shift Fire Stations

The proposal introduces 12-hour day-shift crewing at Bicester, Chipping Norton,

Faringdon, Wallingford/Crowmarsh, and Witney.

Modelled outcomes indicate improved daytime first-engine response times and significantly increased full-time daytime availability, reflecting the well-evidenced challenges in daytime on-call recruitment and turnout.

Harwell Parish Council acknowledges the operational rationale presented but is not able to support the proposal on the basis of the evidence provided. However, these gains must not come at the expense of night-time response capability, when communities are most dependent on reliable and rapid emergency cover. At present, the Council is not satisfied that the proposals demonstrate nighttime resilience will be maintained.

3. Night-Time Resilience and Rural Cover

Under the proposals, the number of guaranteed full-time night-time engines would reduce from seven to six. The Council has significant concerns that this could slow response times in semi-rural and commuter-route areas such as Harwell.

Local councillors—reflecting resident sentiment—highlight specific risks:

- Night-time availability varies more significantly and is less predictable.
- Evening commuter traffic on the A34, A417 and other strategic routes increases the consequences of delayed response.
- Longstanding on-call recruitment and retention challenges must be stabilised before any reduction in night-time station coverage is confirmed.
- The Council requests publication of the full night-time response modelling and assurances that rural and semi-rural communities will not experience diminished resilience.

Clear mitigation plans are needed to ensure predictable cover during late evening and overnight periods. At this stage, the Council cannot support any reduction in guaranteed night-time cover without much stronger evidence that response performance will be protected.

4. Didcot Fire Station – Local Impact

Didcot Fire Station remains unchanged in the proposals. Harwell relies on Didcot for primary emergency cover, making the station's resilience fundamental to public safety in the parish.

The Council seeks reassurance that the county will:

- Maintain a sustainable crewing model as Science Vale continues to expand;
- Support consistent availability during peak-risk hours;
- Ensure operational strength along the A417/A34 corridor, which has a persistent pattern of serious incidents.

As the primary cover for Harwell and surrounding high-growth areas, Didcot's operational stability must not be diluted.

5. Proposal A – New North Oxford Fire Station

There is no direct impact on Harwell. The Council does not offer a position on this proposal as it has no direct local impact.

However, modelling assumptions based on a station not yet confirmed or sited risk undermining the reliability of projections. Structural decisions should not rely on hypothetical infrastructure.

6. Proposal B – Removal of the Second Fire Engine at Thame

The Council does not comment on this proposal as it has no direct local impact. The Council requests continuous monitoring of response times and incident risk, to ensure that any reduction in capacity does not adversely affect nearby communities.

7. Proposal C – Closure of Three On-Call Stations

The Council does not take a position on closures outside the Harwell area but requests continued monitoring of any indirect impacts on Didcot or Science Vale.

The Council strongly requests:

- A published transition plan showing how gaps in night-time and rural resilience will be mitigated;
- Confirmation that any efficiencies generated will be reinvested into prevention, resilience, and improved on-call recruitment—particularly in high-growth areas such as Science Vale.

8. Investment Proposals (D, E, F)

The Council supports prioritising:

- Expanded Station Support Officer roles;
- Maintaining adequate crewing levels across the service;
- Protecting Oxford's 24/7 capacity where sustainable funding is secured.

Recruitment and retention of on-call firefighters must become a strategic priority. Without improved stability in the on-call model, wider structural changes risk creating gaps in night-time resilience.

9. Prevention and Community Safety

Harwell Parish Council welcomes the strengthened emphasis on prevention and community safety, including targeted support for vulnerable residents and workplaces with elevated risk profiles.

Increased daytime professional capacity should translate into practical, local delivery—not simply aspirational targets.

10. Transparency, Trust and Decision-Making

The Council emphasises the need for open and accessible public engagement when reshaping essential emergency services. Residents deserve clarity, candour, and

meaningful opportunities to understand how changes will affect local safety and response capability. Given recent experiences of county-level consultation, the Council urges OFRS to adopt a more transparent, accountable approach as these proposals develop.

11. Conclusion

Harwell Parish Council is not able to support the proposals as currently presented. The Council requires further evidence and reassurance on the following points:

- Protection of night-time resilience across rural and commuter-route areas;
- Safeguarding the operational strength of Didcot Fire Station;
- Transparent modelling, particularly where assumptions rely on unconfirmed infrastructure;
- Reinforcement of on-call recruitment and retention before any reduction in night-time capacity;
- Reinvestment of efficiencies into prevention and operational resilience;
- Ongoing engagement with parish councils as implementation progresses.
- The Council limits its comments to matters with direct local impact and looks forward to more detailed engagement once stronger evidence is available.

Brize Norton Parish Council

Brize Norton Parish Council welcomes the opportunity to respond to the consultation regarding the future service delivery model of the Oxfordshire Fire and Rescue Service (OFRS). While we recognise the service's need to ensure resources are matched to current risk profiles, we submit that the existing modelling fails to adequately account for the exceptional, immediate, and strategic growth mandated for West Oxfordshire, rendering the current proposals, especially those relating to the A40 corridor, unfit for purpose.

Our primary concern is that any proposal that seeks to reduce or relocate fire cover within the rapidly expanding West Oxfordshire area is fundamentally flawed, as it is based on historical data rather than verifiable future planning requirements.

The Scale of Strategic Growth in West Oxfordshire (2027–2043)

The West Oxfordshire District Council's Local Plan (2027–2043) dictates an unprecedented level of development that must be factored into all emergency service planning:

- District-Wide Requirement: WODC is required to deliver approximately 18,000 new homes within the 2027–2043 Plan Period.
- Strategic Corridor Focus: The A40 linking Eynsham, Witney, and Carterton is designated as a 'Strategic Corridor for Growth'. The development proposed

within this corridor alone totals 10,800 new homes, representing the majority of the district's growth.

- Concentrated Pressure on Local Areas: This immense growth places unsustainable pressure on fire and rescue provision across the entire corridor:
- Eynsham Area: Plans for 3,200 new homes, including Salt Cross Garden Village. This village will also include employment land (40ha) which will generate 4,000 daily employees, dramatically increasing the daytime risk profile.
- Witney and Carterton Sub-Area: Significant planned development (as part of the 10,800 home total) within and around these existing service centres warrants a rigorous re-evaluation of crewing levels and resource availability at the Witney station and the newly relocated Carterton/Brize Norton station. This growth must directly inform decisions on how these key stations are crewed (e.g., wholetime vs. on-call provision).

Specific Concerns from Brize Norton Parish Council

On behalf of the residents of Brize Norton, we must also highlight that this Parish Council intends to recommend that WODC reconsiders development for 3,000 homes at Barnard Gate, located between Eynsham and Witney, as this site now complies with the Local Plan Spatial Strategy.

Should this proposal proceed alongside the existing Eynsham and A40 corridor plans, the immediate vicinity between Witney and the Oxford West entrance will absorb over 6,000 new homes and 4,000 new jobs, vastly increasing the call-out density and required response times for the OFRS.

Recommendation for Re-evaluation

Given the scale of planned and mandated development, particularly the designation of the A40 corridor as the primary focus for growth in West Oxfordshire, Brize Norton Parish Council strongly recommends that the OFRS re-evaluate its resource planning entirely for this area.

The immense volume of new risk being concentrated across the entire Strategic Corridor (Eynsham, Witney, and Carterton) requires a corresponding, enhanced, and permanent provision.

We request that the OFRS modelling be revised to include the full future population and employment load of the WODC Local Plan 2043 and that this strategic, long-term risk profile guides the final decision on the Main Proposal and all subsequent Options (A-F). Specifically, the viability of a permanent, enhanced fire station presence in Eynsham and the crewing and operational levels of the existing/relocated stations at Witney and Carterton/Brize Norton should be examined to ensure adequate response times and safety for this rapidly transforming community.

Kind regards

Jo Webb
Clerk to Brize Norton Parish Council

West Oxfordshire District Council

West Oxfordshire District Council's Overview and Scrutiny Committee met on 7 January 2026 to consider Oxfordshire County Council's consultation proposals titled "Improving our fire and rescue service". This followed a motion at the 3 December 2025 full Council meeting titled "Protecting Fire Services in West Oxfordshire", which was referred to the Committee by Council.

The meeting was attended by Mr Macdougall as the Community Safety and Chief Fire Officer, who introduced the proposals and answered questions. The Committee then considered and debated its response to the proposals on behalf of the Council.

The Overview and Scrutiny Committee resolved that West Oxfordshire District Council;

1. Formally wishes to thank the Community Safety and Chief Fire Officer for his attendance and time spent answering the Committee's questions.
2. Opposes the implementation of the proposal being consulted on as it currently stands due to the loss of the fire stations in Eynsham and Woodstock and the concerns detailed below.
3. Has the following concerns over the proposal being consulted on:
    a. Disproportionate adverse impacts on West Oxfordshire, which stands to potentially lose two fire stations.
    b. A lack of detail on real response time impacts and worst-case response time impacts (rather than average response times) of the proposed closures of Woodstock and Eynsham fire stations on rural communities in West Oxfordshire. Decision makers and residents require more detailed information.
    c. Recruitment opportunities not being fully explored as an alternative to closures e.g. more outreach to employers.
    d. A lack of information for decision makers on the impact of higher station availability on response times, if stations were to kept open and on-call staffing enhanced.
    e. Housing growth not being fully considered in the report, which will increase the local demand for services and the pool of potential fire fighters over time.
    f. A lack of assurance that a new facility in North Oxford will come forwards.
    g. The need for greater transparency on how proposed changes to staffing patterns (i.e. more full-time fire fighters) will be funded.
    h. Impacts of proposed closures on lives, residents, firefighters, climate change, flood risk, protection of the Blenheim World Heritage site.
    i. Staff morale for on-call firefighters in particular, and potential job losses if closures go ahead.
    j. The overall level of data provided in the consultation and the fact that the investment proposals (E and F) don't have free text boxes unlike the other consultation questions.

4. Requests that the implementation of the proposals is deferred until the concerns have been addressed and enough time has been given to exploring the alternatives.

Yours sincerely,

Cllr Andrew Beaney
Chair of the Overview and Scrutiny Committee
Cllr Genny Early
Vice-Chair of the Overview and Scrutiny Committee

Fire and Rescue Services Association Response to: Oxfordshire Fire and Rescue Service Consultation – 'Improving our fire and rescue service'

1. Introduction

Founded in 1976, the Fire and Rescue Services Association (FRSA) is a national, independent, member-led trade union representing other public-spirited individuals who are primarily On-Call firefighters. In 2018 the union changed its name from the Retained Firefighters' Union (RFU) to the FRSA to take account that our membership had been widened to welcome other fire service employees (grey and green book staff) who are more aligned with our values, our professional approach to negotiating local terms and conditions and how we positively and pragmatically represent our members at local and national level.

We ourselves are a broad-church, representing a wide range of political views, but with a common commitment to serve the local and national communities. For this reason, we have agreed not to exercise our right to strike, as our members cannot, in clear conscience, place their communities at risk by withdrawing their professional services.

2. The Community Risk Management Plan Process

Prior to reforms in 2004, the location of fire stations and crews was based on national standards of fire cover. These standards were developed pre-war to ensure both national consistency and the protection of vital infrastructure. These standards enabled the responsible authorities to plan within a very structured system. There were however increasing difficulties with this process. Fire and rescue services found the process too rigid. They were often compelled to place resources in areas which they knew were fundamentally low risk, and at the expense of areas with higher risk.

To overcome this problem the government removed the requirement for fire and rescue authorities to follow national standards, but mandated that new plans be produced based on local assessment of risk. These were known as Integrated Risk Management Plans (IRMPs). The purpose of these plans was to integrate the analysis of risk along with mechanisms to ameliorate it. Fire and rescue authorities could set their own response times based on the assessment of risk in their area, amend duty systems to meet that risk, and at the same time engage in prevention activities to reduce risk wherever possible. Risk was not the same as demand. For example, major

infrastructure facilities may have very low demand upon the emergency services, but in the event of something going wrong, would create a major emergency. High rise buildings have relatively recently been recognised as potentially high risk with additional duties on key stakeholders to ensure not only their safety, but an adequate emergency response. The IRMP process has subsequently been renamed the Community Risk Management Plan (CRMP) but remains essentially the same.

In addition, under the Civil Contingencies Act 2004, fire and rescue authorities were given specific duties to prepare for emergencies and engage with other emergency services to overcome these risks. Under the Act, Category 1 responders, including fire and rescue authorities, have a duty to plan for a major emergency as defined by the Act – and this can include being able to function due to a shortage of staff. In preparing their plans fire and rescue authorities need to ensure that they have resources available to cope with major emergencies.

Our response to the proposals draw on our experience of almost 50 years, representing members at local and national level and putting forward evidenced arguments to maintain and modernise the On-Call duty system (OCDS). There have been numerous studies and reports published over the years by a wide variety of organisations and groups which have highlighted the problems the OCDS faces in the modern day but more importantly the solutions which are available to not just overcome the problems but to make a sustainable framework for decades to come.

Visionary fire and rescue services have already put measures in place to reverse the downward trend of On-Call appliance availability and are already reaping rewards (Mid and West Wales, Shropshire, Devon and Somerset, Lancashire, Humberside etc). Fire and rescue services that believe in the OCDS and the economic and societal benefits it brings. There are also those who do not and have never believed in the OCDS and prefer to revert to what they know, understand and are comfortable with, irrespective of whether that provides the tax-payer with best value (see Warwickshire and Buckinghamshire).

Our concern is that these proposals fit into the latter category, using biased evidence to justify their preferred outcome. In our experience ORH Ltd has a proven track record of facilitating the decline and demise of the OCDS. ORH is not independent and we believe that this company has been chosen due to its track record of providing evidence to argue reductions in On-Call establishments, a simple ‘google-search’ will confirm this.

When formalising our response to this consultation we have specifically used the latest research into the OCDS published by Exact Consultants, a document that has been shared with all Chief Fire Officers in the UK, the research was joint funded by the National Fire Chiefs Council (NFCC) and the Ministry of Housing and Communities and Local Government (MHCLG) and is available on our website.

3. Our response

Closing On-Call stations may show small countywide averages, but it weakens local resilience and community safety.

The consultation sets out that Eynsham, Henley and Woodstock have low staffing hours and that closure is modelled to add only **1–2 seconds** to *average* first appliance response times across Oxfordshire (and 1 second to second appliance in Henley's case).

But **countywide averages are the wrong lens** for judging station closure decisions, because they can conceal:

- **place-based impacts** (the communities around each station lose the nearest local crew and local knowledge);
- **system resilience impacts** (loss of "depth" for concurrent incidents, spate
- conditions, extreme weather, major road closures, and large-scale events);
- **prevention/protection capacity impacts** (On-Call stations are often the visible local interface for prevention activity and community risk reduction, especially in rural and semi-rural areas);
- **future recovery risk** (once stations and teams are lost, rebuilding On-Call capability is significantly harder than improving it).

The NFCC national study explicitly cautions that headline performance measures can incentivise the wrong decisions if they are not sufficiently linked to community risk and resilience outcomes.

The consultation itself evidences the problem: On-Call hours are falling—but that is exactly what the national study says can be tackled.

The consultation describes a "critical shortage" of On-Call staffing hours, including a reported **36% drop in full-time equivalent On-Call firefighters over 10 years**, and that at peak times "only around 5 out of 27 On-Call fire engines would be available."

That challenge is real. But the NFCC research is clear that across the UK, the principal problems are recruitment/retention fragility, training/competence burden, employer release barriers, and culture and it sets out a practical reform agenda to reverse decline.

In other words: Oxfordshire's stated driver for change is **precisely the national "On-Call sustainability" problem** and the national solution is **more reform**, not shrinking the On-Call estate.

The closure proposal conflicts with what NFCC says "good" looks like: invest,

modernise, and widen the pool.

The NFCC report's recommendations include, among other actions:

- **flexible/tiered contracts** to widen the applicant pool (micro-roles, school-hours cover, different commitment levels);
- **modular/blended training** to shorten time to first deployment and fit around work/family life;
- **employer engagement programmes** (toolkits, incentives/recognition, practical rostering support);

- **culture change** to address "two-tier" perceptions between wholetime and On-Call, improving morale and retention;
- **data and performance improvements** linked to risk, not just simplistic availability figures.

Closing stations is not a substitute for doing the above. If Oxfordshire proceeds to close stations because cover is low, that risks becoming a **self-fulfilling spiral**: reduced visibility → reduced recruitment → reduced availability → further closures.

There are demonstrated alternatives that improve availability without removing On-Call stations.

The NFCC study contains multiple UK case studies where services improved On-Call availability through targeted reforms e.g. flexible contracting, modular training, continuous recruitment, hybrid "work from station" arrangements, employer engagement, broadening roles, and better utilisation of partial On-Call staffing.

These approaches are directly relevant to Oxfordshire because the consultation's main challenge is **weekday daytime cover**, which is exactly where employer release, flexibility, and training design matter most.

Specific concerns about workforce impact: "possible job losses" should be treated as a red line.

The main proposal and related changes acknowledge potential impacts including **"possible job losses"** for some On-Call staff (including those who work daytime-only and those affected at Rewley Road).

Redundancy risk and station closures undermine retention, morale and trust factors the NFCC report highlights as central to the sustainability of the On-Call system. If the goal is to increase On-Call availability, then creating conditions that push experienced On-Call firefighters out is counterproductive.

What Oxfordshire should do instead (aligned to NFCC evidence).

We ask the Service and the Fire Authority to **remove** the proposal to close Eynsham, Henley and Woodstock from the options taken forward, and instead commit to a time-bound On-Call improvement programme with measurable outcomes.

Below is a practical package drawn from the NFCC recommendations and case studies.

A. A 12–24 month "On-Call Availability Recovery Plan" (before any closures)
   - **Set clear targets** (e.g., "increase availability of named On-Call appliances during
   - weekday daytime by X% in 12 months"), with transparent reporting.
   - **Use risk-linked measures**, not just "averages", and report locality-level effects (including concurrent incident resilience).
   - **Protect stations while rebuilding**: treat station closures as a last resort after the recovery plan is attempted and independently evaluated.

B. Modernise recruitment: widen the pool, reduce drop-out, speed up "time to competence"

Implement the NFCC "Top recruitment actions", particularly:

- **tiered/flexible contracts** and micro-commitments to attract people who cannot do traditional hours;
- **faster, candidate-friendly recruitment processes** with active management of attrition points;
- **modular/blended initial training** so recruits become deployable sooner and can train around work;
- **targeted recruitment using data** to focus on high-potential communities and demographics (including women and underrepresented groups).

C. Employer engagement: make weekday cover feasible

The consultation narrative recognises modern work patterns as a key barrier.

NFCC's evidence-based answer is: structured employer engagement (toolkits, agreements, recognition and incentives).

Oxfordshire should:

- build formal **employer release agreements** for priority stations;
- offer **recognition schemes** for supportive employers;
- actively target **work-from-home** populations and local large employers.

D. Retention and culture: stop the "two-tier" damage

The NFCC report is explicit that a perceived two-tier workforce undermines morale, recruitment and retention.

Oxfordshire should commit to:

- regular retention check-ins and exit interviews;
- visible parity of esteem (development pathways, inclusion, leadership behaviour standards);
- improving facilities and kit fit to remove barriers (particularly for women).

E. Better utilisation of On-Call capacity (even when full crews aren't available)

NFCC case studies show services making smarter use of partial On-Call availability e.g. incident support teams or alternative crewing approaches that increase overall resilience.

This can help Oxfordshire convert "some availability" into "useful operational contribution" rather than treating stations as either fully available or not.

Questions we ask the Fire Authority to answer before proceeding

- **What specific NFCC-recommended recruitment/retention reforms have been trialled in Oxfordshire, for how long, and with what measured outcomes?**
- **What is the plan to prevent closures from worsening recruitment** (by reducing local visibility and confidence in the On-Call role)?

- Given the consultation proposes reinvestment opportunities/efficiencies, **what proportion of any savings will be ring-fenced for On-Call sustainability measures** (contracts, training redesign, employer engagement, facilities)?
- How will decision-makers evaluate **local risk and resilience impacts**, not just countywide averages?

Insufficient scrutiny of workforce utilisation and value for money.

While the consultation places strong emphasis on the availability challenges of On-Call fire stations, it provides **little equivalent scrutiny of the utilisation, workload, or cost-effectiveness of Wholetime fire stations and appliances**, despite these representing the highest proportion of the Service's revenue spend.

Oxfordshire Fire & Rescue Service currently operates six Wholetime stations and seven Wholetime fire engines, staffed either 24/7 or under day-crewing arrangements. These resources are permanently staffed and therefore incur significantly higher ongoing costs than On-Call appliances. However, the consultation and supporting ORH modelling do not publish:

- incidents attended per Wholetime station or appliance;
- incidents attended per Wholetime firefighter;
- comparative cost per incident between Wholetime and On-Call appliances; or
- any assessment of whether Wholetime resources are proportionate to local risk and demand.

This absence of data is notable because **low incident volumes are explicitly cited elsewhere in the consultation as justification for removing or downgrading On-Call appliances**. For example, the consultation highlights that the second fire engine at Thame attended only around 17 incidents per year within Oxfordshire, and this is used as evidence that its continued operation cannot be justified.

No equivalent test is applied to Wholetime appliances, despite their far higher staffing and infrastructure costs.

This creates an **unequal evidential standard**, where:

- On-Call resources are required to demonstrate high utilisation to justify their existence;
- Wholetime resources are largely assumed to be efficient and necessary, without published evidence of workload or value for money.

The ORH modelling focuses primarily on response time optimisation and appliance availability, which are important metrics, but **do not in themselves measure operational demand, efficiency, or cost-effectiveness**. Improvements of a few seconds in average response times are used to justify substantial permanent staffing increases and station relocations, yet consultees are not provided with the information needed to assess whether these Wholetime resources are heavily used relative to their cost.

The NFCC On-Call Research Study explicitly warns against relying on narrow availability and response metrics, noting that:

- availability does not necessarily equate to risk;
- headcount does not equate to operational value; and
- under-utilised appliances should be reviewed so that savings can be redirected into improving workforce sustainability.

Importantly, this recommendation is **not limited to On-Call appliances**. The principle applies equally to Wholetime resources.

Before any decision is taken to close On-Call stations or remove On-Call firefighters, the Fire Authority should therefore publish transparent, station-level data showing:

- the average number of incidents attended annually by each Wholetime fire engine and station;
- the estimated cost per incident by crewing model;
- comparative utilisation of Wholetime and On-Call appliances; and
- how these figures relate to local risk profiles rather than countywide averages.

Without this information, it is not possible for the public to assess whether the proposals genuinely "match resources to risk", or whether lower-cost On-Call capability is being reduced while higher-cost Wholetime capacity is protected from equivalent scrutiny.

In the context of the NFCC's national evidence, it would be premature and potentially counterproductive to close On-Call stations without first demonstrating that all Wholetime resources are proportionately utilised, cost-effective, and optimally aligned to risk.

Conclusion

The consultation places significant emphasis on the availability challenges of On-Call fire stations yet provides little evidence on the operational demand or cost-effectiveness of Wholetime fire stations. In contrast, low incident numbers at certain On-Call appliances are used to justify their removal.

Before any On-Call stations are closed, the Fire Authority should publish station-level data showing incidents attended per appliance, per firefighter, and per £ spent across both Wholetime and On-Call models. Without this, it is impossible for consultees to assess whether resources are genuinely being matched to risk, or whether high-cost Wholetime capacity is being protected from scrutiny.

The NFCC On-Call Research Study recommends reviewing under-used appliances and redirecting savings into improving On-Call recruitment and retention. This principle should apply equally to Wholetime resources.

Oxfordshire's challenge declining On-Call hours and daytime appliance availability is exactly the national sustainability challenge described in the NFCC On-Call Research Study.

The national evidence shows that **more can and should be done** to improve recruitment and retention through flexible contracting, modular training, employer engagement, culture change, and risk-linked performance management.

For those reasons, we urge Oxfordshire County Council and Oxfordshire Fire & Rescue Service to:

- **reject the closure of Eynsham, Henley, and Woodstock On-Call stations,**
- **avoid the loss of On-Call firefighters,**

and instead adopt a properly funded, time-bound On-Call improvement plan aligned to NFCC's recommendations and proven practice.

Ends

Tristan Ashby

Chief Executive Officer

Fire and Rescue Services Association

tristan.ashby@frsa.org.uk www.frsa.org.uk

Oxfordshire Fire Brigades Union Formal Consultation Response

Fire & Rescue Cover Model proposals / "Improve our fire and rescue service"

Submitted on behalf of the Fire Brigades Union (FBU), Oxfordshire
Date: 31 January 2026

Submission and position

This submission is made by the Fire Brigades Union (FBU) in Oxfordshire. We represent operational firefighters whose work protects life, property and the environment. We also represent the professional voice of the workforce that provides emergency response at all hours, in all conditions, in every community across the county.

The FBU rejects the proposals being consulted upon. The package amounts to a reduction in fire cover and resilience dressed as "efficiency", with risks transferred from the service onto the public and the frontline. The proposals include station closures, removal of appliances, reduced guaranteed night-time cover, and a structural dependence on an already stretched on-call system. They are accompanied by workforce measures that raise serious safety concerns, including the prospect of reduced crewing and duty system changes that would intensify fatigue risk in a safety-critical service.

We also reject the framing of these proposals as a technical adjustment to achieve "parity" or "optimal deployment". The consultation documents openly acknowledge that the model is expected to make the service in Oxford City "slightly worse", through a conscious transfer of resources away from the county's most deprived and most diverse area. That admission alone requires a higher standard of justification, a deeper equality analysis, and a clear demonstration that less harmful alternatives have been properly developed and considered. None of that has been provided to the standard required for a decision that puts life risk and firefighter safety at stake.

What is being consulted on, in the services' own terms

The services' own communications describe a set of proposals grouped under the themes of effectiveness, efficiency and investment. The "effectiveness" theme includes the introduction of five day-shift stations; removal of the on-call fire engine from Rewley Road; building a new fire station toward the north of Oxford combining Rewley Road and Kidlington; and reallocating specialist rescue capability across more stations with the disbanding of the specialist rescue unit at Kidlington. The "efficiency" theme includes removing the second fire engine from Thame and closing up to three on-call stations: Eynsham, Henley and Woodstock. The "investment" theme presents options that could be enabled by increasing revenue, including maintaining an additional 24/7 fire engine for Oxford, maintaining station establishment levels, and retaining Station Support Officers.

Alongside these public themes, staff materials clarify the operating logic. The service intends to redeploy wholetime firefighters into day shifts at stations that currently rely on on-call, because availability is lowest during daytime hours when demand is highest. At night, the service intends to rely more heavily on on-call cover, stating that on-call availability is "very good" at night and that this gives confidence in the approach. The same staff materials also introduce a major operational risk: if the day-shift model reduces watch establishments, management is considering either reducing normal crewing to four persons or creating new annual leave rules that restrict how much leave can be taken at any one time in order to retain five-person crewing. Both approaches have significant safety, fairness and workforce sustainability implications.

It is essential to recognise what this bundle of changes represents in real-world terms. It is not a single isolated adjustment; it is a system-wide reconfiguration that combines (a) reduced stations and appliances, (b) reduced guaranteed cover at key times, (c) reorganised duty systems, (d) dilution or removal of specialist capability, and (e) employment consequences including relocation, potential redundancy risk for on-call staff, and disruption to the Kidlington accommodation base. In a high-consequence public protection service, such a bundle must meet the highest tests of evidence, lawfulness, transparency and safety. It does not.

Why the proposals are a reduction in cover and resilience, not an improvement

The proposals reduce the physical footprint of fire and rescue provision and weaken the system's capacity to cope with concurrent incidents and protracted events. Station closures remove local response assets and community presence. Appliance removals reduce the number of immediately available resources and increase reliance on distant mobilisations. The proposal to remove the on-call pump from Rewley Road, combined with the relocation/merger plan for Rewley Road and Kidlington, removes a long-established response base from the historic city centre. The proposal to remove a second appliance from Thame reduces the ability to sustain operations and to respond simultaneously across South Oxfordshire and the surrounding areas. The disbanding of specialist rescue capability from Kidlington reduces readiness for complex rescue scenarios and undermines multi-discipline resilience.

The service seeks to justify these changes through a "parity" argument: that rural areas are disadvantaged by poor on-call availability and that transferring resources can even out response performance. That framing is incomplete and unsafe. Fire and rescue risk is not a fairness exercise in equalising averages on a map; it is a duty to manage risk by ensuring the fastest possible effective intervention where life risk is highest, and by providing resilient capacity to handle what actually happens in real incidents: rapid escalation, delayed discovery, multiple calls, and overlapping emergencies. The correct question is not whether a county-wide average response time curve looks smoother; it is whether the system retains enough capacity, in the right places, at the right times, with the right skills, to save lives and protect firefighters across Oxfordshire. These proposals fail that test.

Even within the services' own documentation, the improvement narrative is contradicted by admissions of harm. The Equalities Impact Assessment explicitly states that Oxford City's response performance is forecast to be "slightly worse" under the options being put forward and describes this as a "conscious move" to transfer resources. Where a public service knowingly worsens emergency response in the county's most deprived and diverse area, it bears a heavy burden of justification. That burden has not been met.

Consultation process and governance: why the process is not fit for purpose

The FBU's formal correspondence to the Chief Fire Officer in October 2025 set out serious objections to the process by which these proposals were developed and communicated. The union's position was that proposals of this scale should not have been communicated to staff and the public before meaningful consultation and negotiation with the recognised union had taken place. Staff communications included FAQs and briefings that described potential redundancy consequences for on-call employees, and guidance about employee speech and media engagement, before the

union had been provided with the full evidence base, the options appraisal, or the operational and equality analyses required for a meaningful response.

In response, the service asserted that it did not believe it had breached industrial relations protocols and stated that it had scheduled briefings with unions ahead of staff briefings. We do not accept that this meets the standard of meaningful consultation and negotiation expected in the fire and rescue sector, particularly under the National Joint Council principles and established "no-surprises" practice. Consultation is not a box-ticking exercise conducted after a plan is written and rolled out in internal briefings; it must occur at a formative stage, with adequate disclosure and genuine scope to influence outcomes.

Moreover, the staff briefing summary for those "likely to experience the most change" (Group 1) included a "Use of Social Media and Media Protocol" section that instructs employees not to engage with the media or post, comment, or share content related to the service on personal social media without prior approval. In the context of a public consultation on proposals that would reduce cover, remove stations and threaten job security, such guidance is not a neutral reminder. It has a chilling effect on lawful debate, on whistleblowing, and on union members' right to express concerns and participate in public discussion. A consultation conducted alongside a communications posture that appears to limit workforce voice cannot be regarded as genuinely open or inclusive.

The services' own culture roadshow document also provides context that cannot be ignored. It records staff concerns about a lack of genuine engagement in key initiatives, lack of clarity in decision-making, information overload, duplication, and the reality that on-call members "can't keep up to date" with key messages. The same material identifies a "Covid legacy" of feeling, repeated themes about trust, and a perceived weak feedback loop ("you feed back to you but then nothing happens"). Against this backdrop, the obligation on the service is to demonstrate exceptional transparency and collaboration, not to move fast to consultation while essential data and options remain contested.

Worsening industrial relations and the foreseeable risk of industrial action

The manner in which these proposals have been developed and communicated has already caused substantial and avoidable damage to industrial relations within Oxfordshire Fire and Rescue Service. This is not a theoretical concern or a "tone" issue; it is an operational risk in its own right. Fire and rescue depends on trust, stability, and confidence—between the workforce, representative bodies, and senior decision-makers. A process that is perceived by frontline staff as pre-determined, publicly launched before genuine negotiation, and accompanied by communications that explicitly contemplate job loss and enforced contractual change creates predictable consequences: deepening mistrust, entrenched positions, and an escalating dispute environment that becomes increasingly difficult to resolve.

The Oxfordshire Fire Brigades Union has already been forced to take the exceptional step of making a formal complaint about the way the proposals were issued, on the basis that proper union engagement did not occur before staff and public communications were released. In our formal correspondence we set out that this approach is inconsistent with the agreed industrial

relations framework and NJC expectations, and we made clear that failure to address the issue promptly may leave the union with no alternative but to escalate the matter through formal dispute procedures.

This is a critical point for the County Council and senior officers to absorb: the present approach is not simply generating disagreement with the *content* of the proposals; it is actively generating dispute about the *legitimacy of the process itself*. That dynamic is corrosive, and it is wholly avoidable if the proposals are withdrawn and replaced with genuine joint problem-solving from a formative stage.

Industrial relations have further deteriorated because the workforce has been confronted with communications that do not merely describe possible future organisational change, but explicitly foreshadow redundancy consultations, displacement, and significant alterations to duty systems and work locations. For example, the HR correspondence sets out scenarios where station or unit closure could trigger a redundancy consultation exercise, and also references the possibility of redundancy situations arising where employees cannot relocate or where on-call cover requirements are reduced.

Regardless of how the service attempts to frame these statements, the plain effect is to create immediate job insecurity and anxiety—*before* any meaningful negotiated resolution has been secured. This sequence—publishing "job-threatening" proposals and referencing redundancies before meaningful agreement with the recognised union—was one of the central reasons the FBU raised the formal objection in the first place.

In that context, it is entirely predictable—indeed inevitable—that the workforce response hardens and that members begin to demand that their union prepares to defend them using all lawful means available. The union has already publicly warned that industrial action is a real possibility if these plans are not withdrawn, and that firefighters are considering "all options" to fight the cuts.

It is important for decision-makers and consultees to understand what this means in practice. In the United Kingdom, any move to strike action requires a formal statutory process, including a lawful ballot and the provision of notices. When a proposal programme creates widespread fear of job loss, forced relocation, and unsafe duty system changes—combined with a perception that consultation is occurring after the decision has effectively been made—it directly increases the likelihood that the workforce will press for precisely that statutory ballot process to begin. This is not the route the union seeks; but it is a foreseeable and rational consequence of an approach that has already produced profound anger and loss of confidence among operational staff.

This dispute risk is also not confined to Oxfordshire alone. Oxfordshire FRS is not operating in a vacuum, and industrial relations pressures do not exist in isolation from the national context in which firefighters are experiencing sustained under-investment, mounting demands, and significant strain on emergency response resilience. When local employers pursue programmes that threaten jobs, capability and conditions of service—especially through processes perceived as bypassing negotiated standards—those disputes can and do escalate beyond local boundaries, drawing in regional and national union structures and potentially

contributing to wider industrial momentum. Oxfordshire should not assume that the consequences of this programme will remain neatly contained. It is precisely for this reason that the union has already placed on record that failing agreement risks escalation through the formal industrial relations machinery.

For the avoidance of doubt, the existence of this dispute trajectory is not being stated as an attempt to "pressure" the consultation outcome; it is being recorded as a material impact arising from the way the proposals have been handled and the severity of what is being proposed. A consultation that destabilises industrial relations at scale risks harming workforce retention, undermining morale, increasing sickness and turnover, and damaging operational delivery long before any implementation date is reached. The County Council and senior officers therefore have a responsibility—today, during the consultation period—to prevent escalation by withdrawing these proposals, abandoning the approach of unilateral publication, and committing to genuine negotiated development of alternatives that protect public safety and firefighter welfare.

What "meaningful consultation" requires and why this consultation does not meet it

A lawful and fair consultation must enable respondents to make an intelligent response. For a cover model that affects survival, firefighter safety and public risk, that requires: a transparent statement of the problem being solved; disclosure of the evidence base; clear comparison of all credible options including a non-reduction option; identification of all impacts (including equality and health and safety); adequate time and accessible information; and a genuine willingness to change course in light of what is heard.

The material provided does not meet that standard. Some of the most consequential assumptions are embedded in technical modelling documents that most residents will never read, and which are not presented in plain language alongside the consultation narrative. Where technical material is provided, it is difficult to interpret without specialist knowledge, and does not clearly disclose how assumptions shape results. Where workforce consequences are acknowledged (redundancy risk; changes to crewing; duty systems), they are presented in HR communications and FAQs that stress support rather than dealing with the substantive risk. Where equality impacts are identified, the analysis does not deepen as required when an adverse impact is admitted. In those circumstances, the consultation cannot be said to provide the public and the workforce with a fair opportunity to understand what is being proposed, to test the justifications, and to suggest safer alternatives.

Public safety: why response time averages are not a sufficient measure

The Services materials focus heavily on response performance, often presented as mean response times or performance curves. The union does not deny the relevance of response time; early intervention matters. However, a public safety system cannot be designed by chasing a single metric, especially an average. There are at least five reasons.

First, averages conceal extremes. Fire deaths, serious injuries and firefighter near-misses often occur in the tail of the distribution: the slower responses, the concurrent incidents, the incidents where resources are already committed and cover moves across the county. A plan that improves the mean while increasing the tail is a plan that can still kill.

Second, response time is only one component of outcome. What matters is effective intervention: adequately crewed appliances arriving with the right skills, equipment and command capability, at the right time. Reducing crewing, diluting specialist capability, and removing stations can degrade effectiveness even if an algorithmic average looks acceptable.

Third, the system must cope with concurrency and escalation. A county will experience multiple incidents simultaneously, and a single "high demand" period can generate overlapping mobilisations. Removing appliances and closing stations reduces surge capacity exactly when it is needed.

Fourth, response performance must be understood alongside prevention, protection and resilience. Many incidents are prevented or mitigated by non-emergency work, and resilience is required for weather events, infrastructure incidents, large fires and complex rescues. The Services own documentation acknowledges increasing pressure and the need for productivity in prevention work, but the workforce reality is that cuts to cover and the destabilisation of duty systems can reduce capacity to deliver these functions.

Fifth, a response model must reflect real operational practice, not an idealised future state that assumes away inconvenient demand or relies on unproven recruitment improvements. A model that presumes enhanced night-time on-call availability while simultaneously closing on-call stations is a model that contradicts itself.

What the modelling report actually shows: Oxford is made worse by design

The modelling report prepared with Oxfordshire Fire & Rescue Service data states that it uses five years of CAD workload data (April 2019 to March 2024) for demand analysis, two years (April 2022 to March 2024) for response/performance analysis, and availability datasets from Vision and Gartan. It also describes a shift to a "model base position" intended to reflect future operations, including removing wholetime support from despatch logic, removing certain AFA responses in low and medium risk properties, and using Gartan on-call availability data rather than Vision to reflect a position where on-call crews cannot rely on overtime from wholetime staff.

Within that modelling, the "Main Model Option (North Oxford) – Overall" reports improvements in service-wide mean response by incident type. Yet when the same scenario is broken down by local service for primary fires and RTCs, Oxford is shown as worse. In that scenario, the mean first appliance response for Oxford increases from 08:19 to 09:07 (an increase of 00:48) and the mean second appliance response increases from 10:42 to 11:46 (an increase of 01:04). The day-only view similarly shows

Oxford's first appliance worsening by 00:47 and second appliance worsening by 00:42, while other districts improve substantially. The modelling therefore aligns with the Equalities Impact Assessment's narrative: the design choice is to transfer performance away from Oxford to improve other areas.

The modelling also contains a specific scenario labelled "Main Model Option (Rewley Road) – Night" which shows Oxford's mean first appliance response for primary fires and RTCs worsening from 08:15 to 08:28 (00:13) and its second appliance response worsening from 10:19 to 12:23 (02:04). A two-minute deterioration in the second appliance response to life-risk incidents at night is not a trivial "performance impact"; it is a material reduction in the ability to deliver timely additional personnel, water, BA capability, rescue capability and incident command support at precisely the time when staffing and availability are already constrained.

The union's position is that these modelling outputs, even before any critique of assumptions, are sufficient to reject the proposals. A public authority should not knowingly worsen emergency response in the county's most deprived and diverse district in order to improve performance elsewhere, especially when the change is framed as a "conscious move". That is not "improving" the service. It is re-prioritising risk in a way that will foreseeably harm the communities that already carry the greatest vulnerability.

Why the modelling assumptions cannot justify cuts and closures

The modelling report itself makes clear that the model base position is not the same as validated historical operations. It removes wholetime support from dispatch logic for certain incident types, removes a category of AFA responses, and replaces Vision availability with Gartan to represent a future where overtime support is not relied upon. Each of those steps is an assumption with major consequences, and in combination they change the fundamental operating environment that the model then claims to "optimise".

Removing categories of calls from the model reduces demand and can artificially improve performance metrics, because fewer appliances are committed to low-priority incidents and therefore appear more available. Yet whether and how the service will cease responding to those AFAs is not a neutral technical detail; it is a policy change with potential consequences for risk, for public expectation, and for the broader safety ecosystem. It is not acceptable to use that assumed future demand reduction to justify station closures and appliance removals in the core response model.

Similarly, removing wholetime support from dispatch logic may reflect an aspiration to rely less on wholetime at night, but it is not a risk assessment. Wholetime support exists in dispatch logic for reasons: capability, reliability, and rapid attendance for incidents where delay or under-attendance can be fatal. Changing dispatch logic to suit a reduced-cover model is circular reasoning: the model changes the rules to make the reduced-cover option look workable, then claims the results prove the option is safe.

The same circularity arises in the portrayal of on-call availability. The staff briefing summary says that daytime availability is lowest when demand is highest and that the service relies heavily on overtime and additional hours, described as costly and unsustainable. That is an argument for investment and stable staffing, not for cutting stations. The correct response to an availability gap is to fix the capacity problem—through recruitment, retention, better employment arrangements, and central government funding—not to close stations and remove appliances, thereby reducing the system's ability to respond when the gap inevitably persists.

Finally, the modelling approach is not a substitute for operational judgement. A sophisticated travel time calibration does not account for all real incident factors: traffic anomalies, roadworks, weather, event-related congestion, crew fatigue, training levels, command complexity, and the unpredictable distribution of concurrent calls. If the modelling already shows Oxford's response worsening, those real-world factors are likely to make the lived impact worse still.

Night-time cover and the move to on-call dependence

A central feature of the proposals is to reduce the use of wholetime firefighters at night and instead increase their use during the day, relying more on on-call at night because night availability is described as "very good". On paper this might look attractive: redeploy fixed costs to match daytime demand while depending on a traditionally stronger on-call night pattern.

In practice, the proposal is a high-risk bet. It concentrates risk in three ways. It increases the consequences of any on-call shortfall because fewer wholetime resources are guaranteed at night. It increases the potential for concurrent incident failure because fewer appliances are in fixed availability. And it increases fatigue and safety risk because on-call members, who already juggle work and home commitments, become even more critical to the system's integrity at night.

The union's concern is intensified by the efficiency proposal to close up to three on-call stations (Eynsham, Henley and Woodstock) and by the prospect of redundancies among on-call employees unless they can transfer. It is internally inconsistent to argue that the future model relies on strong night on-call availability while proposing actions that will remove stations, displace crews, reduce support, and trigger redundancy risk. On-call viability depends on stability, community links, local employer relationships, and the lived feasibility of responding from home or work. Closing stations and forcing transfers undermines those foundations.

Moreover, the services own internal documentation acknowledges the mismatch between "actual" on-call availability (Gartan) and "enhanced" availability (Vision) that includes overtime by wholetime staff. The workforce has kept the system afloat through additional hours. That is not a reason to restructure and cut; it is evidence that the county is already running at the edge of capacity.

On-call station closures: Eynsham, Henley and Woodstock

The closure of on-call stations is presented as a response to “perennially poor” availability. The union does not deny the reality of on-call challenges; we have raised retention and recruitment pressures for years, and the service’s own culture roadshow material records the strain on on-call members and their difficulty keeping up with internal communications. However, closure is not a solution; it is an admission of failure to support a system that is vital to Oxfordshire’s resilience.

Closing Eynsham, Henley and Woodstock removes emergency response bases that serve distinct communities, with distinct road networks, risk profiles, and incident patterns. It also removes a visible prevention and reassurance presence, and it breaks the local relationships that are essential for on-call recruitment. Once a station is closed, rebuilding that local system is extremely difficult. The effect is not just longer travel time; it is a reduced ability to generate local turnout, to support local employers, and to maintain skilled, experienced crews embedded in their areas.

The closure proposal also undermines the services stated aim of improving daytime availability while relying on on-call at night. The most sustainable on-call systems are those with a stable base, consistent support, and a credible operational role. Proposing closure sends the opposite message: that on-call is expendable when inconvenient, rather than an essential component to be invested in. That message will harm recruitment across the county, not only at the stations listed for closure.

In addition, the equality dimension must be addressed. Rural communities include older populations, isolated dwellings, and travel distances that can make outcomes highly sensitive to response delays. Urban communities in Oxford include high-density housing, HMOs, student accommodation and diverse populations. A safe county model must avoid trading one set of vulnerabilities against another. The proposal does exactly that: it attempts to improve rural averages by degrading Oxford and by closing rural on-call stations, then relies on the remainder of the on-call system to cover more ground. That is not resilience; it is fragility.

Removing the second appliance from Thame

The removal of a second appliance from Thame is presented as an efficiency measure. The union’s view is that it is an unacceptable reduction in capacity that will have immediate and foreseeable operational consequences. A second appliance provides the ability to mount effective initial attack, to sustain BA operations, to provide additional pumps for water, and to manage multiple simultaneous calls. It is also critical for the reality of Oxfordshire geography: travel times, major roads, and the distribution of towns and villages mean that a second pump in the right place can be the difference between a controlled incident and a major incident.

Removing a second appliance also increases pressure on neighbouring stations to provide reinforcement, which in turn increases the likelihood that those stations are unavailable for their own areas. This is how cover collapses in practice: a cut in one place does not stay local; it ripples across the mobilisation plan. The modelling

approach, particularly if it assumes demand reductions and altered dispatch rules, cannot fully capture this ripple effect in a live operational environment.

The consultation documents also place this proposal within a wider set of changes, including station closures and changes to Oxford cover. The combined effect is a county-wide thinning of capacity. In that context, removing a second appliance at Thame is not an isolated efficiency; it is part of a package that reduces the system's ability to withstand stress.

Rewley Road, Kidlington and the removal of city-centre cover

The proposals involve removing the on-call pump from Rewley Road and creating a new station toward the north of Oxford combining Rewley Road and Kidlington. The public materials and union campaign materials describe this as removing fire engines from Oxford's historic city centre and merging established bases. The union agrees with that characterisation: regardless of how a new build is described, removing a base from the city centre changes travel time, route options, and immediate intervention potential for a dense, complex risk environment.

Oxford city centre presents unique operational challenges: narrow streets, heritage buildings, high footfall, mixed occupancy, and significant life risk. It also presents traffic constraints and event-related congestion. A response base proximate to the centre provides not only faster attendance but also local knowledge and operational familiarity that improves effectiveness. Moving that base north is a degradation of capability in the heart of the county's most complex risk area.

The modelling results reinforce this concern. The scenario testing changes associated with Rewley Road at night shows Oxford's second appliance response to primary fires and RTCs worsening by over two minutes. The union considers that a serious warning sign: it indicates that the removal of a key Oxford resource, even within a model that assumes demand reductions and altered dispatch, produces a measurable deterioration in the ability to deliver the second appliance. In the real world, that second appliance is often the difference between sustainable BA rotations and unsafe operations, between a rescued casualty and a delayed rescue, and between a controlled incident and rapid escalation.

We also note the workforce dimension that has been communicated publicly: that firefighters in Kidlington face losing homes as a result of the Oxford station changes. The HR and staff materials indicate that significant establishment changes and relocations are anticipated, including moving wholetime positions from Kidlington to enable day-shift systems elsewhere. Where service accommodation is involved, it must address this openly: the risk of housing loss is not a side issue; it is a material workforce impact that affects retention, recruitment and morale.

Specialist rescue capability and the proposal to disband the Kidlington specialist rescue unit

The proposals include reallocating specialist rescue capability among more stations and disbanding the specialist rescue unit at Kidlington. Union materials describe this as cutting a specialist rescue vehicle, including a rescue tender. Whatever language is used, the substance is clear: specialist capability is being diluted and centralised capability at Kidlington is being reduced or removed.

Specialist rescue is not a discretionary add-on; it is an essential component of modern fire and rescue. Oxfordshire faces road traffic collisions, water and flood risk, industrial and infrastructure incidents, and complex rescues in urban and rural settings. Specialist rescue units provide trained personnel, equipment, and coordinated capability that cannot be replicated simply by spreading limited kit thinly across stations. A unit provides readiness, depth of skill, training continuity, and the ability to scale quickly.

Disbanding a specialist unit while simultaneously reducing stations and appliances is an attack on resilience. It reduces the county's ability to deal with low-probability, high-impact events, and it increases the risk that specialist skills will become degraded through insufficient use and training. The service cannot substitute this with aspirational language about "reallocation" unless it commits, in detail, to equivalent staffing, training time, equipment standards, and guaranteed availability. No such binding commitments have been provided.

The consultation should also acknowledge the national context that the union has raised: extreme weather events and rising operational demands. Wildfire pressure, flooding, and climate-related incidents require capacity and specialist skills, not less. Cutting or diluting rescue capability in this context is strategically backward.

Crewing, crew sizes, and the unacceptable idea of reducing normal crewing to four

The Group 1 staff briefing summary raises an issue that goes to the heart of firefighter and public safety. It states that if day-shift options proceed and watch establishments are reduced, management is considering two ways to manage the reduction: either reduce normal crewing on fire engines to four persons, or impose new annual leave arrangements that restrict leave so that five-person crewing can be maintained.

The union's position is clear. Reducing normal crewing to four is unsafe. It undermines the ability to deliver simultaneous tasks on arrival, delays the establishment of water supplies, delays BA entry, reduces immediate casualty handling capability, and increases individual workload and risk. It also reduces the robustness of incident command and the ability to manage dynamic risk assessments. In fire conditions where seconds matter and where the environment is rapidly deteriorating, a four-person crew is not a marginal change; it is a fundamental reduction in operational capability.

The alternative presented—restricting annual leave to maintain five-person crewing—also has serious consequences. It places the burden of reduced establishment on the workforce by limiting rest and family life, increasing fatigue, and eroding goodwill. Both "solutions" point to the same underlying truth: the proposed model does not have sufficient staffing to deliver safe, sustainable cover without compromising either crewing or rest. That is the definition of an unsafe model.

The appropriate response is not to force an unsafe crewing standard or to restrict leave; it is to abandon the reductions that create the staffing gap and to pursue investment and recruitment strategies that maintain safe crewing and wellbeing.

Duty systems, fatigue and the risks of 12-hour shift proposals

The union has stated publicly and in formal correspondence that it will not accept any move to 12-hour shifts. Union campaign materials warn that crews would be forced to work unsafe 12-hour shifts, and that this is part of the attack on working conditions. While the public consultation materials do not always set out shift patterns in detail, the workforce briefings and HR materials make clear that new day-shift duty systems are central to the model and that wider staffing and crewing changes are being considered.

In a safety-critical service, duty system design is a core health and safety issue. Fatigue impairs performance, decision-making and reaction time. It increases accident risk and increases the risk of errors in high-hazard environments. The union's critique of the Equalities Impact Assessment highlights that the EIA introduces a shift-pattern change without applying established UK health and safety guidance on fatigue and shift work, including guidance that warns against long shifts and requires a thorough fatigue risk assessment.

The service must not treat duty system changes as a staffing mechanism detached from safety. Any proposal that increases shift length, intensifies work, or reduces recovery time must be justified with a robust, evidence-based fatigue risk assessment that covers the full duty cycle, including post-shift travel (an identified risk route), training demands, and secondary employment pressures that are common in on-call and mixed systems. That level of analysis has not been provided to consultation respondents. In its absence, it is not credible to claim that the model "improves safety" while simultaneously pushing the workforce toward more fatigue-inducing patterns and reduced crewing.

Redundancy risk, relocation and workforce stability

The Staff FAQ explicitly states that the proposed changes could potentially result in some on-call employees being made redundant unless they are able to transfer to other fire stations, which the council says would be its preferred outcome. It also outlines that if redundancies arise, the council will seek to minimise redundancies by considering suitable alternative roles. This is a significant admission. In an emergency service already facing on-call shortages and recruitment challenges, proposals that create redundancy risk are inherently contradictory. They remove experienced people,

destabilise availability, and discourage prospective recruits who see the role as insecure.

The HR letter and staff FAQ also indicate that establishment positions would be relocated from Kidlington to enable day-shift duty systems at other stations. Relocation is not a mere administrative change; it affects commuting, family life, local knowledge, and retention. The union's press materials further highlight that members may lose their homes in Kidlington as a direct consequence of the Oxford proposals. Such impacts are corrosive to morale and recruitment and must be treated as a central issue, not a footnote.

The services' HR messaging emphasises support, including signposting to wellbeing services and resilience training. Support is welcome, but it cannot be used to normalise harmful change. The correct approach is to prevent foreseeable harm by withdrawing unsafe proposals, not to offer counselling while proceeding with them.

Equality and the admitted detriment to Oxford City

The Equalities Impact Assessment (dated 28 October 2025) makes several statements that are directly relevant to the legality and ethics of this proposal. It identifies that Oxford City is the county's most deprived district (referencing IMD 2019) and that the proportion of residents who are not "White British" is greatest in Oxford at 46.5% (and lowest in West Oxfordshire at 11%). These are not incidental facts; they indicate that Oxford contains a larger proportion of people who are more likely to experience disadvantage and more likely to share protected characteristics.

The EIA then states that, while first appliance response improvements are forecast during the day in four of the five local council areas, the performance in Oxford City is forecast to be "slightly worse" under the options being put forward. It describes this as a "conscious move" to transfer resources to less densely populated rural areas that suffer from poor on-call availability to ensure greater parity across the county. It also states that despite this reduction, response performance is forecast to remain between around 1% and 12% better in Oxford City than other parts of the county overall, due to Oxford's risk profile and the proposal to keep resources higher for Oxford compared to other parts.

The union's response is that the existence of a relative advantage compared to other districts does not justify making Oxford worse. Equality law and public ethics do not permit an service to knowingly worsen emergency response for the most deprived and diverse area because others will still be worse. The duty is to have due regard to eliminating discrimination and advancing equality of opportunity. If an adverse impact is identified for the communities most likely to include protected groups, the service must show the depth of analysis and mitigation expected in such circumstances. Simply asserting "parity" is not sufficient, and it is not a lawful substitute for a proper equality analysis and a genuine exploration of less harmful alternatives.

Why the Equalities Impact Assessment is inadequate

The union's detailed critique of the EIA explains why it fails to meet the standard expected under the Public Sector Equality Duty. The EIA does not clearly structure its analysis around the three statutory aims of the PSED. It frames the decision primarily as a geographic parity exercise rather than an assessment of impacts on people who share protected characteristics. It acknowledges an adverse effect in Oxford, then fails to deepen its analysis accordingly. It does not disaggregate the impact sufficiently, does not clearly show consideration of less disadvantageous alternatives, and risks treating county-level benefits as a justification for area-level detriment in a way that equality guidance warns against.

The EIA also fails to integrate the health and safety dimension of duty system changes. In a safety-critical environment, changes that increase fatigue risk can have disproportionate effects on particular groups, including older workers, workers with certain health conditions, carers, and those with longer commutes. An equality assessment that does not incorporate fatigue risk assessment is incomplete.

An adequate EIA would not only describe demographic facts and general mitigations; it would demonstrate, with specificity, how the service has tested alternatives, how it will prevent worsening service for Oxford's deprived communities, how it will ensure that duty system changes do not create disproportionate detriment, and how it will monitor and correct impacts in real time. None of this is provided in a way that enables confidence in the proposals.

Culture, trust and the ability of the organisation to manage change safely

A major contextual factor is the organisation's own culture evidence. The culture roadshow material records persistent staff concerns: lack of clarity on decision-making forums; information overload; duplication of key messages; difficulty identifying priorities; and the reality that on-call members cannot keep up to date. It also records a lack of genuine employee engagement in key initiatives, explicitly listing initiatives such as Botley Road (Eynsham staff), Rewley Road, rescue tender, direct entry, and 5-to-4 crews. It describes weak feedback loops and a sense that concerns are raised but not acted upon.

This context matters because organisational change in emergency services is not only a technical exercise. It depends on trust, willingness to cooperate, learning culture, and the ability to identify and correct risk. A model that reduces cover and increases reliance on on-call at night requires a high-trust environment and a robust learning culture, because any shortfall will have immediate safety consequences. Implementing such a model amid documented concerns about engagement and feedback is irresponsible.

The union therefore considers that the proposals are not only unsafe in substance; they are unsafe in context. The service has not demonstrated that it has the culture, engagement infrastructure and trust required to safely implement a system-wide

reconfiguration that depends on the workforce absorbing disruption while maintaining performance.

The so-called “investment options” do not cure the core problem

The consultation materials present investment options: funding uplift to maintain an additional 24/7 fire engine for Oxford (by uplifting the proposed day shift engine at the new north Oxford station), maintaining watch establishments at current levels, and retaining Station Support Officers. These are presented as things that might be enabled by increased revenue.

The union’s position is that these should not be framed as optional extras; they are the baseline requirements of a safe service. “Maintaining establishment levels” is not an investment luxury; it is the minimum needed to avoid unsafe crewing and restricted leave. Retaining Station Support Officers is not a discretionary add-on; it is essential support for on-call stability, especially if the service intends to rely more on on-call at night. Maintaining additional Oxford cover is not an enhancement; it is mitigation for the admitted detriment to Oxford performance.

The way the options are presented also raises a governance concern: the service appears to be consulting on a cut model while dangling investment as a conditional alternative. That approach risks creating a false choice and obscures the reality that the safest option is to withdraw the cuts entirely and pursue funding and workforce solutions. If the service believes investment is needed, it should make the investment case openly and lead with it, not use it to soften or legitimise reductions.

What should happen instead: a safe, evidence-led alternative

The union is not simply saying “no” without proposing a path forward. A safe alternative begins with an honest diagnosis: Oxfordshire Fire & Rescue has been operating under resource pressure, with daytime availability challenges, reliance on overtime and additional hours, and recruitment/retention issues particularly affecting on-call. The appropriate response is to invest and stabilise, not to cut and destabilise.

A safe plan would prioritise: protecting existing stations and appliances; improving on-call sustainability through better support, improved employment arrangements, employer engagement, and guaranteed training/progression; expanding wholetime capacity where risk justifies it; investing in prevention and protection with adequate staffing; retaining specialist rescue capability with clear minimum standards; and improving performance through targeted improvements rather than systemic reductions.

Such a plan must be co-produced with the workforce and the representative unions at a formative stage, with transparent data, shared problem definition, and independent facilitation where needed. It must include a fully worked non-reduction option, and it must treat equality and health and safety not as annexes but as core decision criteria.

The union is ready to engage on this basis. We cannot accept, and will continue to oppose, a pathway that starts with station closures, appliance removals and reduced

guaranteed cover and then asks the public to choose how much harm they are willing to tolerate.

Conclusion and formal demand

For the reasons set out in this submission, Oxfordshire Fire Brigades Union issues an unequivocal rejection of these proposals and demands that Oxfordshire Fire & Rescue Service and Oxfordshire County Council **withdraw them in full and without delay**. There is no mandate—operational, ethical, or legal—for a programme that closes stations, removes appliances, reduces guaranteed cover, dilutes specialist capability, and threatens jobs and conditions while knowingly worsening service provision for Oxford. These proposals are not capable of being made "safe" through minor amendments, mitigations, or phased implementation. They must be abandoned.

Oxfordshire FBU is setting out clear red lines. **There will be no acceptance of station closures or mergers that remove established local response capacity; no acceptance of appliance removals or reductions in resilient pumping capability; no acceptance of any reduction in safe crewing standards, including any move toward four-person crewing; no acceptance of imposed duty system changes that increase fatigue risk, including any move to 12-hour shifts; no acceptance of the disbanding or dilution of specialist rescue capability; and no acceptance of redundancies, displacement, or the use of job insecurity to force through a cover model that endangers the public and firefighters.** These are matters of life safety, not negotiable "efficiency measures".

The service must also be under no illusion about consequence. If decision-makers continue to pursue this programme—whether by attempting to "push through" implementation after the consultation, or by repackaging the same reductions under a different name—the union will respond accordingly. Oxfordshire firefighters will not be used to deliver managed decline, and the FBU will take every lawful step necessary to defend public safety, firefighter safety, and our members' jobs and conditions.

The FBU's duty is to the public and to our members. We will oppose these cuts at every stage and by every lawful means available. **Cuts kill**—and in fire and rescue that is not rhetoric. It is the reality of what happens when emergency response capacity is removed and risk is shifted onto communities and frontline.

This Document has been put together by Region 12 Officials and Oxfordshire FBU Executive Committee

Appendix: documents reviewed and how they inform this submission

This submission is grounded in the services' consultation and workforce materials and in union documents produced in response. The key documents reviewed include: the HR letter to staff about the cover model consultation (dated 24 October 2025) outlining the effectiveness, efficiency and investment themes and listing specific proposals and investment options; the Staff FAQ (version 1) describing the rationale for day-shift redeployment and reliance on night on-call, and acknowledging potential redundancy

risk for on-call employees; the Group 1 briefing summary (22 October 2025) setting out the core and additional proposals and explicitly raising the possibility of reducing normal crewing to four or restricting annual leave; the internal briefing slides (22 October 2025) outlining the modelling methodology and option summary; the "Improve our fire and rescue service" Equalities Impact Assessment (dated 28 October 2025) admitting a forecast deterioration for Oxford City as a conscious move to transfer resources; the union's detailed report critiquing the EIA for PSED and fatigue assessment failures; the ORH modelling report setting out demand, availability and response modelling assumptions and scenario outputs including Oxford performance impacts; the culture roadshow document recording staff concerns about engagement and decision-making; and union campaign and communications materials including the public "Cuts Kill" leaflet and the press release about the county-wide mass meeting and rally.

Taken together, these documents show a consistent pattern: the proposals reduce stations and appliances; they rely more heavily on on-call at night while destabilising the on-call system; they risk unsafe crewing and fatigue; they admit harm to Oxford City; and they are being advanced in a context of low trust and documented cultural concerns. That combination is why the union rejects the proposals and calls for withdrawal and replacement with an investment-led, collaboratively developed plan.

Appendix 1

Report: Critique of the "Improving our fire and rescue service – Equalities Impact Assessment"

Purpose of this report

This report examines the Equalities Impact Assessment (EIA) dated 28 October 2025 for the proposal to "improve our fire and rescue service." It tests that EIA against the requirements of the Public Sector Equality Duty (PSED) in section 149 of the Equality Act 2010 and against current UK safety guidance on shift work and fatigue.

The key problem is simple: the EIA openly admits that Oxford — the county's most deprived and most diverse area — will get a slightly worse service, but it does not then do the deeper, more specific equality work that UK law expects once such an adverse effect is identified. At the same time, it introduces a shift-pattern change in a safety-critical service without applying well-known UK guidance from the Health and Safety Executive (HSE) and the Health Services Safety Investigations Body (HSSIB) on fatigue and long shifts. That combination makes the EIA procedurally weak and substantively incomplete.

UK legal and guidance backdrop

Equality Act 2010, section 149

The council/fire service must, when making decisions, have due regard to the need to:

1. eliminate discrimination, harassment, victimisation and other prohibited conduct;
2. advance equality of opportunity between people who share a protected characteristic and those who do not;
3. foster good relations between people who share a protected characteristic and those who do not.

EHRC technical guidance on the PSED (England) makes clear that:

- the regard must be conscious and contemporaneous (i.e. visible at the time of decision);
- the depth of analysis must increase where an adverse impact is identified;
- authorities must consider less disadvantageous options where they know a disadvantage will occur;
- you cannot "average out" a detriment to one group or area by pointing to benefits elsewhere.

HSE guidance on shift work and fatigue (notably "Managing shift work: Health and safety guidance (HSG256)" and HSE's "Fatigue" pages) says that employers must assess proposed shift systems because long or poorly designed shifts increase fatigue, and fatigue increases accidents, injuries and ill-health, particularly in dangerous or safety-critical work. HSE is explicit that shifts should ordinarily be limited to 12 hours and to shorter periods where the work is demanding or risky — which firefighting clearly is.

HSSIB report on the impact of staff fatigue on safety (2025) confirms that long or intensive shifts are still being implemented without adequate recognition of fatigue as a safety risk and that post-shift driving is a real route to harm.

Together, these set the standard: if you worsen a service for the area most likely to contain protected groups, you show your equality working; and if you change shifts in a safety-critical service, you show your fatigue working.

The proposal and what the EIA says

The EIA relates to a package of service changes including:

- introducing day-shift wholetime systems at five stations that previously relied on on-call cover;
- creating a new station in north Oxford and merging Rewley Road and Kidlington;
- closing up to three on-call stations with "very poor availability";
- removing the second appliance at Thame;
- and redistributing resources so that daytime availability across the county is improved.

Crucially, the EIA says this is a “conscious move” to improve response for rural or less densely populated areas and that, as a result, response in Oxford — described in the same document as the most deprived and most diverse district — will be “slightly worse.”

That is the starting point for all of the criticism below.

Equality-sensitive facts the EIA itself identifies

- Oxford is the county’s most deprived district (IMD 2019).
- Oxford has the highest proportion of non-White British residents (around 46.5%).
- The new model will make Oxford’s service “slightly worse,” while improving service elsewhere.

In other words: the impact falls where deprivation and diversity are highest. That is precisely when the PSED requires a fuller, not thinner, analysis.

Systematic failures

Framing and core-duty failures

No explicit PSED structure.

The EIA never presents its analysis under the three PSED aims. It talks about “parity of response performance” instead of eliminating discrimination, advancing equality of opportunity and fostering good relations. That is an operational frame, not the statutory frame.

Geography treated as equality.

The EIA justifies the proposal as a “conscious move” to transfer resources to rural areas to create parity, while acknowledging Oxford will be slightly worse. That is not what the PSED asks. The duty is to consider people with protected characteristics, not to make the map look fairer.

No increase in rigour once harm is admitted.

Once the EIA says Oxford’s deprived communities will do worse, it should immediately step up: more data, more disaggregation, more explanation. It does not. It continues at a general, county-level narrative.

Improper offsetting logic.

The EIA effectively says: “yes, Oxford is a bit worse, but everywhere else is better, so overall this is fair.” The PSED does not permit a detriment to one group or area to be washed away by improvements to others. Each affected group needs to be considered in its own right.

Failures to identify who is affected

5. **No quantification of the worsened Oxford group.**
   The EIA never says how many residents, how many high-risk households, or how many minority ethnic or disabled people are in the Oxford postcodes that will see a deterioration. Without scale, you cannot show you had due regard to the extent of the disadvantage.
6. **Race impact dismissed on the wrong basis.**
   The EIA notes Oxford is far more diverse, then says ethnicity is not itself a fire-risk factor and concludes there is no specific adverse race impact. That is the wrong test. The right test is whether the decision falls more heavily on a more diverse area. Here, it plainly does.
7. **Disability impact minimised despite Oxford's higher figure.**
   The EIA notes that disabled people face higher fire-death risks and also notes that Oxford has the county's highest proportion of people whose daily activities are limited a lot. It then concludes the model "does not have an overall impact." If you worsen service in the very place with the most disabled people, you need to explain why that is acceptable. The EIA does not.
8. **National risk factors not applied locally.**
   The EIA lists national risk factors (older age, disability, low income, single parents, larger families). It never carries out the obvious step: "are those people concentrated in the Oxford areas we are about to make worse?"

Alternatives and proportionality failures

9. **Declared absence of alternatives.**
   The EIA states that no stand-alone alternative models were fully developed and effectively presents the choice as "do this or do nothing." When you already know your proposal harms the most deprived and most diverse area, you must be able to show you considered less harmful variants. The EIA says it did not.
10. **Cost allowed to displace equality without being recorded.**
    The EIA stresses doing this within the current cost envelope and treats the deterioration in Oxford as an outcome of that. That is permissible only if the authority records that it has weighed cost against equality. There is no such recorded weighing.

Protected-characteristics table failures

11. **Unsupported "no impact" entries.**
    Characteristics such as gender reassignment, pregnancy and maternity, sexual orientation and marriage/civil partnership are simply marked "no impact" without any reasoning. Because the proposals change where and when cover is available, these "no impact" entries look like form-filling, not genuine consideration.
12. **Religion/belief treated as just a headcount.**
    The EIA lists religious populations but does not examine whether changing Oxford's service — the place with the most non-Christian places of worship — affects outreach, reassurance or access for those groups.

13. **Age analysis inconsistent with the EIA's own risk narrative.**
    Elsewhere the EIA notes that older people and some children are higher fire-risk groups. In the table it says age is broadly similar, so there is no impact. Those two statements can't both be right.

Consultation and engagement failures

14. **Consultation is generic, not targeted.**
    The EIA merely says the proposals will be consulted on, without saying the consultation will reach the deprived, diverse and more disabled communities in Oxford that it has identified as taking the hit. That is a procedural gap.
15. **No accessibility or outreach detail.**
    There is no mention of non-digital routes, accessible formats, or engagement through Oxford's minority-faith sites, even though those are mentioned elsewhere. Once the EIA has identified who will be worse off, it should say how their views will be obtained. It does not.

Monitoring and review failures

16. **Empty review promise.**
    The EIA says there is a need for regular review and that the proposal can be adapted. It does not say when, by whom, or on what indicators. Because the PSED is a continuing duty, such vagueness does not demonstrate compliance.
17. **No equality-sensitive indicators.**
    There is no commitment to monitor response times or incident outcomes in the specific Oxford areas that are most deprived, nor for older or disabled residents there. Without equality-sensitive metrics, "we will review" is effectively meaningless.

Evidence-handling failures

18. **Use of dated deprivation data with no refresh.**
    The EIA relies on IMD 2019 to justify a 2025 redistribution that makes Oxford worse off. If deprivation is the whole reason for identifying Oxford as sensitive, the EIA should at least say it will refresh the evidence at consultation or implementation.
19. **Data cited but not applied.**
    The EIA lists population, religion and disability data but does not actually apply them to the concrete proposals. That is "we have data" rather than "we used data."

Employer/staff-side equality failures

20. **Only the upside of day-shift roles is recorded.**
    The EIA says that creating new day-shift opportunities will be welcomed and will reduce the pressure on on-call crews. It does not record that longer or more intensive daytime work can disadvantage older firefighters, disabled firefighters,

pregnant firefighters or firefighters with caring responsibilities — all protected characteristics.

21. **No analysis of the workforce in the affected stations.**
    The proposal names particular stations, but the EIA never asks whether those stations have a workforce profile (for example, more women in particular roles) that would make the change disproportionately harmful.

RTC/safety misclassification

22. **Fatigue-related routes to harm ignored.**
    The EIA says road traffic collision risk is driven by road environment, so the proposal has no adverse equality impact there. Once you change to longer or more intensive day shifts, UK guidance (HSE, HSSIB) says fatigue and post-shift driving become risks. That route to harm is missing from the EIA.

Shift-work and fatigue: what should have been in the EIA

The proposal clearly changes when wholetime firefighters are used. That is a shift-system change, and current UK guidance is unequivocal:

- HSE's "Managing shift work" (HSG256) says employers must assess shift systems, use tools such as fatigue and risk indices, limit long shifts, and shorten shifts for demanding or safety-critical work.
- HSE's "Fatigue" guidance says fatigue leads to errors, accidents and ill-health and must be managed like any other risk.
- HSSIB's 2025 investigation into staff fatigue confirms UK organisations still under-recognise fatigue, particularly its link to post-shift road accidents.

The EIA has none of this. From a PSED perspective, that causes five more failures:

23. **Non-identification of a UK-recognised safety risk.**
    In 2025, any UK emergency-service employer changing shifts should be able to show they considered HSE/HSSIB fatigue guidance. The EIA does not identify fatigue at all.
24. **No differential impact for older or disabled firefighters.**
    UK guidance is clear that fatigue affects people differently and that age and health matter. The EIA does not even raise this, so it cannot show due regard to older or disabled staff.
25. **No gender/pregnancy/caring analysis.**
    Longer, more intense day shifts reduce recovery time and make childcare harder — a known gendered impact in UK 24/7 services. Yet the EIA records pregnancy/maternity as "no impact."
26. **No recognition of cumulative health burden in a high-load occupation.**
    Firefighters already carry a heavy physical and sometimes cardiometabolic load. Adding longer day shifts without acknowledging this is an identification failure.
27. **No fatigue-risk monitoring.**
    The EIA's review section does not include fatigue, injuries or near misses, even though those are the obvious metrics once longer day shifts are introduced.

Overall conclusion

The service has explicitly identified that the only area to get a worse service is Oxford – the county's most deprived and most diverse district – and then failed to carry out the heightened Public Sector Equality Duty analysis that UK law requires in exactly that situation. That is a conscious recognition of adverse impact, followed by an absence of the work that should have followed.

At the same time, it proposes altering shift patterns in a safety-critical, front-line service in 2025 without engaging with HSE and HSSIB material on fatigue, long shifts and post-shift accident risk. That is not just an incomplete assessment; it is a decision taken in disregard of current, domestic safety guidance.

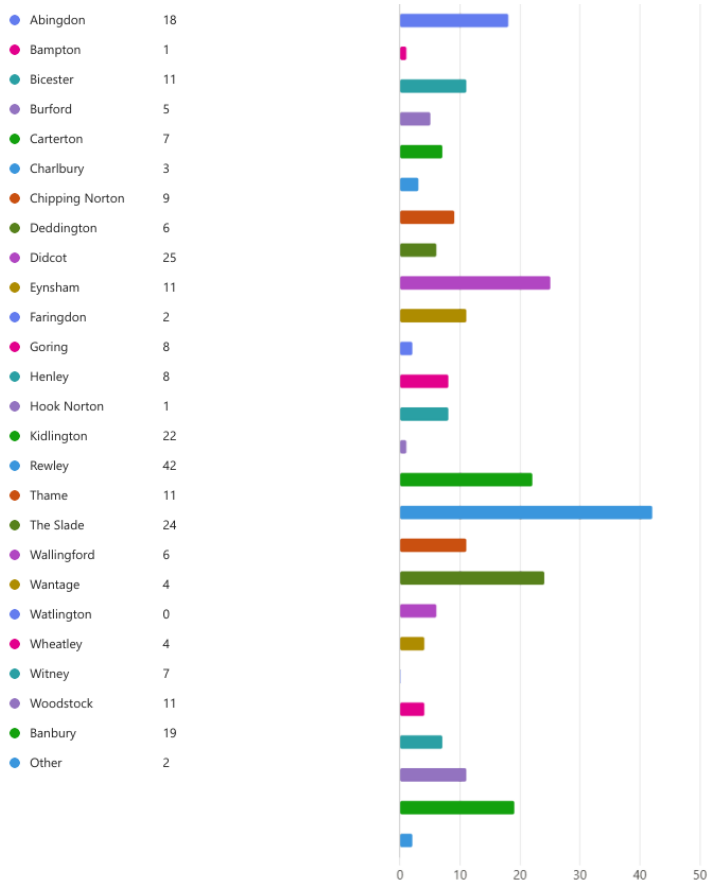
It has declared "no impact" for a number of protected characteristics without setting out any credible reasoning, despite the fact that the change affects where and when emergency cover is physically available.

It has offered "review" but without dates, measures or equality indicators, which means there is, in practice, no review at all.

Taken together, this means that, on the face of the 28/10/2025 EIA, Oxfordshire Fire & Rescue Service cannot demonstrate that it had due regard to the three aims of the Public Sector Equality Duty at the point of decision. That is not a presentational flaw or a missing paragraph; it is a substantive failure to apply the UK statutory framework that governs how this proposal should have centred around.

Appendix B: Oxfordshire FBU Members Survey (05.12.25)

2. Station?



3. Role/Duty System

4. Do you think the service should prioritise and protect frontline funding before frontline cuts are made?

5. Part of the proposal looks to remove a number of Fire Stations. Do you agree with station closures?

6. Do you believe Oxfordshire County Council (OCC) should invest more in fire stations?

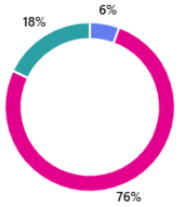
7. The Current proposals include reducing the number of Firefighters. Do you agree that reducing Firefighter numbers makes Firefighters and our communities safer?

8. The current proposals include reducing the number of fire appliances. Do you believe this will improve the service response to our comm unities and make them safer?

Yes	8
No	237
Undecided	22

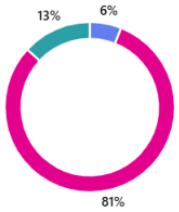
9. Part of the proposals looks to introduce 12-hour shifts. Would you be willing to work a 12-hour duty system as opposed to a standard 2/ 2/4 system?

Yes	15
No	204
Undecided	48



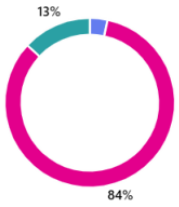
10. Would you support the implementation of a 12-hour (daytime only) duty system at fire stations instead of duty systems that currently pr ovide 24/7 immediately available operational response?

Yes	16
No	216
Undecided	35



11. Would a 12-hour shift be more family friendly for you?

Yes	9
No	223
Undecided	35



12. Do you think these proposals have properly considered the impact on staff with caring responsibilities (Children, disabled & elderly relatives etc.)?

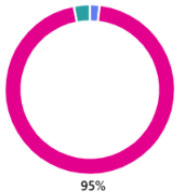
Yes	10
No	239
Undecided	17

13. The proposal includes reducing the number of firefighters per watch to 6 with one annual leave slot. Do you believe this offers enough resilience to cope with sickness, training and other absences?

Yes	10
No	249
Undecided	8

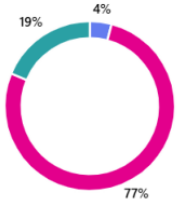
14. Do you believe riding 4 on a wholetime fire appliance provides a safer working platform than riding 5?

Yes	5
No	254
Undecided	8



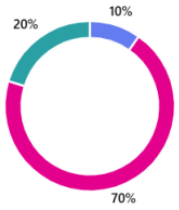
15. Do you believe removing the specialist rescue appliance at Kidlington would have a positive or negative impact on the service?

Positive	11
Negative	206
Undecided	50



16. Do you support the removal of Retained Station Support Officers?

Yes	26
No	187
Undecided	54

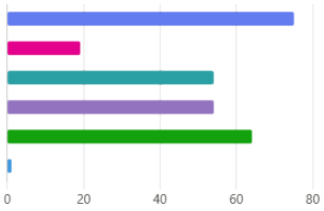


17. Do you support the removal of Wholetime Support backing up retained at incident?

Yes	20
No	220
Undecided	27

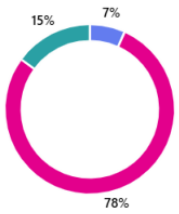
18. If these proposals go through unchanged, which of the following best describes you?

I am likely to leave OFRS alltogether	75
I am likely to leave the retained duty system but stay on OFRS in another role	19
I would stay but will actively look for other roles/services	54
I would stay with no plans to leave	54
Unsure	64
Other	1



19. Do you trust that the service has been open and transparent regarding these proposals?

Yes	18
No	209
Undecided	40



20. Do you think Oxfordshire Fire and Rescue Service should have reviewed the information that has led to this consultation and shared that information with the Fire Brigades Union before launching a full public consultation?

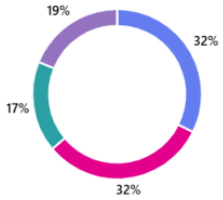
21. Do you have confidence in the data and modeling (e.g. Risk, response times and availability) that underpinned these proposals

22. Has the services approach to these proposals increased or decreased your trust in senior management?

23. Do you feel able to express your views about these proposals openly without fear of negative consequences towards your career

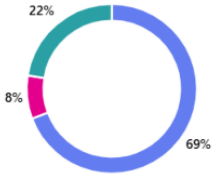
24. Overall, how do you think these proposals will/ or are affecting your health and wellbeing? (Stress, sleep, family life etc.)

Currently/have been affected	86
Huge impact	84
No impact	46
Not thought about it	50



25. Would you support industrial action if OFRS continue to force through these proposals?

Yes	185
No	22
Undecided	60



26. Finally, do you have any additional comments or suggestions regarding the proposed changes to Oxfordshire Fire and Rescue Service?

110
Responses

Latest Responses

28 respondents (25%) answered proposals for this question.

Resident Responses (Anonymised)

1. I completed your consultation last month, but the more I have considered your proposal and reread the information provided, the more it fails to make sense. What I said previously still stands but I would also like to add the following.

   The Proposal acknowledges that most of OFRS's current availability problems have been caused by the lack of on call firefighters yet surprisingly it contains no policies or strategies to address that.

   The Proposal states that closing three fire Stations will only delay times across Oxfordshire by 1 second. That is an extremely misleading and deceptive statement – OFRS managers are fully aware that the three Station areas concerned will have significantly longer attendance times both during the day and even more so at night.

   The Chief Fire Officer said so himself at WODC Overview and Scrutiny Committee Meeting on the 7th January (minute 39:31) and I quote:

   "There is a recognition that if you have Woodstock Fire Station available and you are in Woodstock and you have an emergency then you will get a better response if the fire engine is available"

   Exactly the same applies to both Eynsham and Henley.

   I feel the report has not been fully transparent and has omitted vital facts and data required for the public, and Councillors, to fully understand its consequences. The ORH Model shows many pages of charts and graphs. There is a full page showing the number of Daily incidents each Fire Station had. A full page showing the Mean Turnout Times of every individual fire appliance. Yet, surprisingly, there is no page or data showing the average Attendance times for each individual Fire Station for the same period.

   A fundamental omission. Particularly since all the future models and scenarios are based on average attendance times (albeit, rather confusingly, lumped together in Districts). How can anyone make an informed decision about the proposal if they are unable to compare the before and after results of the proposal?

   Page 33 of the ORH Report shows that the Eynsham Crew have an extremely good Mean Turnout Time, under 4 minutes, which would imply that their Attendance Times on their station ground will be equally impressive. I strongly suspect that Eynsham's attendance times would be significantly faster than the best case Oxfordshire average of 12:41 minutes as stated in the proposal (primary fire).

   It just makes no sense whatsoever to close Eynsham Fire Station, it did have a dip in availability caused by several long serving on call firefighters retiring just

before the period used for this Proposal. Previously it had won awards for 100% attendance. I believe that things have significantly improved since this model period and will continue to improve if OFRS invest more into on call Recruitment and Retention.

New offices and an industrial estate is nearing completion literally across the road from Eynsham Fire station and thousands of new adult residents are expected with the Salt Cross development (2 minutes away from the Station), which will enable further recruitment opportunities well into the future.

Witney seem to be performing very well with their on call crews already – (which is another fact acknowledged by the Chief in the WODC Meeting of 7th January).

Is a whole time day shift there really justified for just 1 call every two days (according to your own statistics).

The introduction of a whole-time day crew at Witney will totally upset the current dynamics of the current on call crews and will ultimately negatively affect overall availability. You are effectively asking Witney on call firefighters to still be on call during the day, just in case a second pump is needed, while their first pump is taken out by whole time day crew (which they would have previously been on). It's very demoralising to watch another crew take your shout.

They will also have less hourly (whole time will do all the FP, checks, maintenance etc on station). The result will simply lead to even more fully trained retained firefighters leaving.

OFRS already have the fire stations and fire engines to provide a fantastic service to our community, they just need to invest (both time and money) into on call recruitment and retention. Together with strategies and innovative incentives to encourage and reward employers for releasing their staff.

Disappointingly, a statement made in the Equalities Impact Statement (top of page 5) states: "This will allow local on-call crews to focus recruitment energies on nighttime hours", which suggests that senior management will still be relying on the local on-call stations to manage their own recruitment in the future. Regarding on call recruitment. Currently OFRS's website states that 'there are no current have a go dates' and 'there are no current Women's taster days'. It makes no sense. Pleasingly, the proposal does show that, with intervention, on call station availability can be significantly improved. Hook Norton's availability increased by a massive 25% – although I am unsure why similar levels of 'interventions' weren't applied to all the other on-call Stations across the county. Surely Eynsham residents and businesses are as important as Hook Norton ones (after all we pay the same taxes). This intervention should continue for ALL on call stations, not just the select few, and on call recruitment and retention should be prioritised. Your own new proposal is reliant on on-call crews at every station across the County yet your proposals will have a further negative effect on the retention of on-call firefighters (and possibly whole time too). A well

managed on call fire station will always be significantly cheaper than a day crewed or whole time station. The Chief also stated in his meeting with WODC 7th January stated that if redundancies were made they “were looking into perhaps using them as bank staff to rely on in spate conditions”. Surely if he expects the Service to be so overwhelmed in the future that it will have difficulty coping without ‘bank staff’ then closing stations seems rather short sighted. The model regarding the location of a new fire station is also confusing. It seems to have been done backwards. Surely it would be more sensible to use a computer model to evaluate the best place to build a new Fire Station based on future developments, environmental changes and areas of greatest need. Not simply choose an area at random and then use the model to calculate from that position. There is no evidence that it is in the best place. Considering the costs of a new Station it would be prudent to ensure that it is correctly sited for now and well into the future. I am also confused with some of your figures, page 33 of the ORH Report states that Thames second pump JX27P2 Mean Turnout Time is 3:00 minutes yet their first pump JX27P1 is closer to 5:00 minutes surely that can’t be correct. Either there has been two coincidental ‘typos’ (very unlikely) or the data has been transposed – worryingly it is this historical data that may have been transferred into all of the modelling done and on which these Proposals (and the removal of Thames 2nd pump) are based. Putting the whole integrity and robustness of the proposal in doubt. The fact it wasn’t even noticed by the ORH or Oxfordshire Fire and Rescue Service is also a significant cause for concern and needs to be investigated.

2. Good Morning

I am taking the time to email you today to share my personal & in some cases shared opinions of the crew at Chipping Norton fire station regarding the proposed changes. I have submitted my views on the feedback form but feel the direct approach is needed too, so as to really help you understand the detrimental effect this will have on our station. I apologize if this is not appropriate but with my job potentially on the line I feel obliged to do so.

Having been in the service over 8 years now with the first 2 -3 starting at Charlbury then fully transferring over to Chipping Norton I have a good insight of how an on-call fire station can & should be run.

Chipping Norton in the last 3 years has won prestigious awards such as "Fundraiser of the year" & more importantly in my view "Fire station of the year" . These have been very proud moments in mine & the crew's careers as its recognition for what we are doing for the brigade & our local community. Further proof that we are representing the brigade in a good light & showing the core values in all that we do.

It has been ever present in recent years the importance of Equality & Diversity throughout the brigade & recruitment. We have taken this on board & have been working tirelessly over the last 2 years especially to appeal to more local business's , persons who work independently & young people leaving education to boost our crew levels & I am glad to report that this has been successful.

We have had 3 new recruits in the last 12 months currently on the run with 1 more looking to complete their "fit to ride" next week Another with a proposed start date of February 4th & another booked in on the March 2 week basic, most of which are covering daytime hours , some doing this solely others through shift pattern . Our fire calls attended last year were boosted by 33% on previous years due to more availability during daytime hours. Come springtime our daytime availability will be hugely improved on years gone by due to our efforts on recruitment & unfortunately we have had very little to no help from the brigade in doing this.

Within this new recruitment of personnel, we have a mix of males & females, people being released from local business's & others who are on military shift patterns or work at home , people who are not of English origin. We have accomplished not only recruiting numbers but diverse numbers at that. Yet despite this if the proposed plans go ahead then all of this disappears with the strong possibility of taking your existing fire fighters with them.

There are stations mentioned in your proposals which this could be of benefit but unfortunately Chipping Norton is certainly NOT one of them.

We have worked so hard to keep high standards through all that we do & even in this demoralizing & uncertain time we WILL continue to do so. We want the opportunity to continue to prove these points to you as we are growing from strength to strength , year on year & look to continue in this light.

I spoke at the start of this email by mentioning I was at 2 fire stations , this is important because while I learnt to become a basic fire fighter at Charlbury , I learnt to be part of a Fire Family at Chipping Norton , I have never wanted to become a Whole time firefighter , my ambition is simple & that is to protect & serve my local community , to build a strong bond from young to old where we live & work & with the commitment that we have on station with many talented individuals that's only set to continue.

DONT break up one of the best assets at your disposal .

3. Hello, I am a full time resident in Henley on Thames and I am appalled of the proposal to close the FireStation in Henley on Thames. Henley is a town dating

back to medieval times. The streets are narrow; some are one way. We have grade one and two listed houses in the centre of the town. Some of these , are next to restaurants, and if a fire were to break out the fire would spread very quickly. Are you aware that Henley has6 residential homes for the elderly ? Also there are at least 8 known retirement communities in the area. These include Laureate Gardens, Victoria Gdns, Bowling Court as well as others in the surrounding areas.There is also a 100 unit project near Henley ,being developed by Elysian Residences. The people occupying these premises, have worked hard all their lives , paid their taxes and deserve to be protected. Also , the residents and businesses pay substantial community charges and business rates and deserve to be protected. Often, there are road works in Henley and it often takes more than 30 minutes to reach the centre of Henley. In my experience it takes less time to exit the town ,than to drive into Henley, in particularly the road between Henley and Wallingford, or Henley and Maidenhead, and of course the Reading Road !
Looking at the map of Oxfordshire,central Oxfordshire and the North(Banbury are well protected. Sadly the south seems somewhat neglected ,particularly if you close the Fire Station here in Henley.
I sincerely hope you read my email, and I ask you to reconsider your recommendations and keep Henley Fire Station open.
Would you be so kind as to reply.

4. I want two fire engines in Thame, because the populous needs it. The firefighters at Thame Fire Station do a marvellous job

5. I am responding rather late in respect of the above consultation, as a resident of Woodstock.

   I have read the consultation proposals and reasoning behind them.

   On checking Woodstock Town Council's response forwarded to you recently, I fully endorse their detailed response and strong opposition to the closure of Woodstock, Eynsham and Kidlington Fire Stations. I completely agree that these proposals, were they to be acted upon, would "undermine public safety and reduce the resilience of the fire and rescue service systems across the area".

6. Thank you for the consultation papers — You assert that if the Henley Station is closed then response times will be the same as now but this cannot surely be the case as Engines will then have to come from Crowmarsh or Reading for Henley residents ? Also, why is it you can't fix the recruitment of on-call firefighters and engine provision for Henley Fire Station.

Henley residents believe that your assertion that service will not be adversely affected if Henley closes just cannot be factually or actually correct.

7. Hi, i have participated in the online survey and attended when SLT representatives have outlined the proposal. I have asked questions about when changes would start (which is answered in the faq as 2027). I have asked questions about how long to implement the changes which received vague answers because the selection of options would impact it. But never the less it is measured in years and years. (to plan and build new fire stations and get them operational). My question is:
   Knowing that the central government is going to restructure local Government on a timeline of 2028, how can it be sensible to launch a plan that will be invalidated, operated by differently elected officials and likely rug-pulled, before it can even start to return projected benefits? This consultation outcome is likely to attract attention of Section 24 local government and public involvement in health act 2027). Can you break down the proposal into steps that can be achieved in the current governance structure (and cost/success be attributed) and things that can be progressed by future governance structures without invalidating previous spending.
   This is not forward planning at all. It tempts the currently elected to "agree" to spend tax payers money with impunity, believing they can blame the restructure the cause of any disrupted outcome or shortcoming in the realisation projected benefits. EG "not my problem" This has nothing to do with political alignment or the intent of the proposal but the granularity and execution of it.

8. I would like to put forward my view that it would be disastrous if Henley fire station were to close. In 2021, the population of Henley was 12,186. With new builds in the surrounding areas that will have increased. From April to September, with various activities going in Henley, that number rises again. The Reggata, the Festival to name but a few. Traffic is heavy enough in Henley. If the town has to wait for a fire engine to come from outside the town, getting over the bridge or from the Fairmile entrance to the town, that could cost lives! I attended the meeting at Christchurch, which was very interesting and there was an excellent turn out because the people of Henley care about the town and the safety of its residents. We were told at the meeting that the response time for a fire crew to reach Henley from outside, for example Wallingford or Crowmarsh it could take as long as 15-18 minutes. That delay could mean that lives are lost.

9. Surely with all the additional housing appearing we need MORE ENGINES AND FIREMEN NOT less!

10. Following the well attended public meeting at Christchurch on Thursday 15th January, I am deeply concerned that Henley Ground fire station is at risk of closure and would like to make the following points... 1) From a current 8 minute response, to a possible 16-20 minute response from out-of-area tenders (negotiating narrow lanes and endless roadworks into the mix) does not give Henley residents resilient cover. 2) That the firefighters were not given adequate information as to the proposed closures, resulting in probable redundancies,resignations and redeployment of personnel at other stations, which needs to be addressed.3) P 17 of the consultation states that £600k would be released from the sale of the Henley station but with the inclusion of the forecourt, it would be worth considerably more and this asset needs to be protected.
11. Hello I attended the meeting at Christ Church in Henley on Thursday 15th January. Following that, I have tried to register https://letstalk.oxfordshire.gov.uk/ , but I am still waiting for a 4-digit Verification Code to be sent to my email address....hours after I started that process. Please can you check that that system is working, because it is not working for me and I am very literate with such online systems. I suspect that it's not working properly and is not allowing people to have their say, ahead of the deadline tomorrow (20th Jan) So instead I am sending my thoughts to you via this email address of fire.consultation@oxfordshire.gov.uk Please can you acknowledge that you have received this email. Looking at the various proposals, it seems totally obvious to me that Proposal C (Closure of three on-call fire stations in Henley, Eynsham & Woodstock) is completely unacceptable. The data presented only mentions averages across the county, when it is clear that the response times for Henley residents (and those living in the surrounding villages) would be much, much worse, leaving us all at greater danger of death, injury and damage, if a fire were to occur. We would be dependent on an appliance coming from Caversham Rd, in Reading, across the border in Berkshire, or from other further station in Oxfordshire. Have you had any support from any Henley area residents for this proposal? I would be surprised if you had, considering the volume and veracity of sentiment that you must have heard at Christ Church, last week.

    We heard how Henley Fire Station was previously reduced from 2 appliances to 1....with the promise that that remaining appliance (plus the station) were secure for the long-term future. It now seems as if we were misled.

    What about the people who live in Remenham and other villages, across the bridge, and into Berkshire, who are also reliant on Henley Fore Station? Have you properly accounted for their needs?
12. Dear Sir/Madam,

Thank you for the opportunity to respond to the Fire and Rescue Cover Model consultation. I want to be clear at the outset that I recognise and accept that change is needed. Oxfordshire is growing, risks are evolving, and the current system is under strain. Doing nothing is not an option.

However, I fundamentally disagree with the majority of the proposals set out in this consultation, because they focus on removing or downgrading parts of the system before the Service has properly attempted to fix what is clearly a failing model – particularly the on-call system – or meaningfully involved the workforce in defining better solutions.

The central issue is system failure, not workforce failure National inspection bodies and professional organisations have been clear for several years that declining on-call availability is a national, structural issue driven by modern working patterns, housing costs, cost-of-living pressures and post-COVID impacts. It is not a lack of commitment from on-call firefighters.

Despite this, the consultation proposals largely treat availability decline as justification for station removal, mergers, or replacement with more expensive models, rather than as evidence that the on-call system itself urgently needs reform, investment and modernisation.

In my view, Oxfordshire Fire and Rescue Service has not moved quickly enough to refresh its CRMP strategy in light of this reality, nor to trial meaningful reforms that could stabilise and improve availability before proposing irreversible structural change.

Reform before removal

I strongly believe that before any station is closed, downgraded or merged, the Service must be able to demonstrate that all reasonable steps have been taken to reform and support the on-call model. That includes:

- Modernising duty systems to reflect modern employment and family life
- Flexible and pooled on call / part time availability models
- Faster recruitment, training and officership pathways
- Better management of sickness and mental health support
- Better management of facilities and support functions
- Full review of all non-ops functions to prioritise operational workforce
- Targeted central support for stations during periods of low availability
- Better use of live data to proactively close availability gaps
- A transparent cost comparison between reforming on-call and expanding wholetime provision

These options have been raised repeatedly by the workforce and align with national recommendations, yet they are not meaningfully explored or costed in the consultation. Removing stations before exhausting these options risks permanently losing experienced staff, local resilience and public trust.

Workforce involvement is essential

The workforce is not resisting change – it is asking to be involved in shaping it. The absence of a co-produced option, developed with frontline and on-call expertise, is one of the most concerning aspects of this consultation.

Proposals such as day-crewed stations and extended 12-hour shifts risk damaging morale, wellbeing, recruitment and retention. Micromanaging productivity through rigid structural change, rather than addressing root causes across the organisation, is unlikely to deliver sustainable improvement.

What is needed is not piecemeal adjustment, but a whole-organisation overhaul: culture, support functions, recruitment pipelines, training capacity, leadership development and operational flexibility. Only then can the Service become the elite, agile, high-performing organisation it should aspire to be.

Value for money and future financial risk

With Oxfordshire County Council facing significant financial pressures in the coming years, it is critical that decisions represent best long-term value for public money. On-call stations, when properly supported, provide local response, community engagement and resilience at a fraction of the cost of fully wholetime alternatives.

Closing stations and expanding wholetime provision may offer short-term certainty on paper, but risks higher long-term costs, reduced flexibility, and greater dependency on fewer assets. Reforming what we already have is not only operationally sensible, it is financially responsible.

My position

- I support change, but not change that removes capability before fixing the system
- I support more wholetime cover where risk genuinely demands it, but do not think day crewing is a viable solution.
- I do not support unnecessary station closures, day-crewed models, or 12-hour shifts that undermine the workforce
- I believe the on-call model should be radically reformed, invested in and valued – not allowed to fail by design
- I believe the workforce must be actively involved in defining the future model

If we are going to make changes that will shape fire cover for decades, then let us make changes that respect the people who deliver the service, protect communities properly, and make the very best use of public money.

I urge the Service to pause irreversible decisions, fully explore reform-led options alongside the workforce, and ensure that no part of Oxfordshire loses fire cover simply because a national system has not yet been fixed locally.

And finally, I would argue that this consultation has brought the brigade into disrepute and there should be an investigation to ensure that due diligence and duty of care has been taken before taking this to the public.

13. I have read the consultation document. Unfortunately, I do not have time to complete the survey. However, I do wish to comment. I object to the closure of Rewley Road fire station. As a long term resident of Osney Island, I feel the need for a city centre station is essential. We have seen recently that there was a fire in the city centre at Mansfield College. There are old buildings in Oxford, which have a greater fire risk. I also object to making professional fire fighters redundant. These people do an amazing job, often putting their own lives at risk. And, sadly, losing them, as we saw at Bicester.

14. Dear Sir / Madam, I have read your report documenting that fire stations could be closed and operating costs might be reduced. I understand that there is a dis-connect with the use of fire fighting labour resources. This seems to be result of historic working patterns and changes in working practices which challenge the availability of fire fighters during daytime hours. But I fail to see that reducing the number of fire stations will the aims you describe. This is clearly a labour management issue, NOT a fire station location issue! Yes, it appears reasonable to reduce availability during night time hours given demand appears to be less. It is obvious that pay and attractive work conditions should apply for daytime fire fighters. Clearly this is not happening to make it sufficiently attractive to recruit the manning levels needed to respond to demand needs?
Once you cut facilities this cannot be put back. Your highly paid consultants making these “one size fits all, economies of scale” proposals clearly don’t live this area to understand to complexity of the congested road systems by proposing a single site which will log jammed by nearby roads. A fire happening? No forget the fire engines won’t get there!
Having more options from different locations creating access benefits which you ignore to the your peril and to those lives at risk of fire. Sorry cutting cuts does not save lives. My parents served with the Oxford fire service during World War. God forbid we have another war, but one bomb on a new fire station would mean curtains for us all. Change your thoughts! Change these proposals for the sake of us all!

15. This ancient medieval town - with twisting streets and confined access - would burn rapidly like a tinder box just as it did in the Great Fire of London were the town not to have the protection of a rapid response to an emergency from a skilled fire fighting team based in the town. A recent hotel fire showed just how quickly they were on the scene measured against the arrival of outside back up fire engines from neighbouring towns. Henley is also close to important to the UKs defence military airfields. In these uncertain times who could rule out a misdirected drone attack, or sadly an aircraft crash on a densely built town centre which cannot be accessed quickly in an emergency. This is unlike neighbouring Marlow for example with its 'outer M25 bypass' access in the event of an emergency. Please view Henley using appropriate criteria and keep and improve our fire station.

16. Hello I am a Henley resident. I have read the Consultation document, attended the online consultation meeting on 3/12/25, completed the online survey and attended the long-awaited public meeting on 15 January 2026 (5 days before the consultation period is planned to close!). I have to say that the more I learn about the proposals to improve the Service, the less I can understand how they will improve it for Henley. The map showing the Response Times (Summary Cumulative) shows little or no improvement. And why was this sheet not included in the copies of the document given to attendees at the meeting yesterday evening? The data presented yesterday evening, and elsewhere, shows that response times will be degraded. The Henley fire station is in a key geographical location to serve a growing urban population and the surrounding very rural area of South Oxfordshire and beyond. It seems that there has been no attempt to look at ways to improve the service from the Henley fire station - in terms of recruitment and reconfiguring the staffing. It is time for a rethink on any changes.

17. Good morning.I attended the meeting in Henley last night on the above and from my point of view, how to save Henley fire station. The evidence provided by some of the audience was compelling to keep the station open. The fire service data information /evidence was proven it appeared , to be very flawed. And using projected data from a data scheme, that has already proven to be flawed (such as one apparently used by the ambulance service).In essence it would be safer , probably cheaper and definitely more efficient to keep Henley fire station going , and use that as the hub to provide fire service to the surrounding areas. I very much hope my views (and those of the supporters at the meeting last night), are taken into consideration to keep Henley fire station open.

18. I attended the public meeting on the 12th January in Eynsham as a local resident and parish councillor. I was surprised that comments made at the meeting were not captured by OCC staff and used as part of the consultation response. This does not seem to follow best practice. Further I am concerned that the supporting financial analysis of the proposals is absent. The implication is that this is a break even set of proposals but this is not clearly modelled unless I have

missed this. If the service were allocated new additional funds to move to the five full day shifts would the other changes and closures be required? I suspect not - so rather than press for additional funds to reduce risk we are faced with flat funding and an increased risk. I also do not see how redundancies will be funded - and do not support them in any case. Such a waste of skilled resource which it sounded like can not be redeployed. I also have concerns about the selection of Eynsham for closure. It is not in the bottom 3 for performance (available shifts) - faces an increasing challenge with significant new housing doubling the size of the community - and seems to yield very little in the way of a capital receipt if sold. The consultation is opaque about the selection / scoring process for choosing stations for closure and there is no option analysis which I would expect in a consultation document. The public is being given no choice and no clear rationale. No attention is paid to the intangible benefits of a local service being maintained - increasing awareness at village events etc. I think the consultation is inadequate and therefore do not support the proposals countywide and specifically for Eynsham.
Any answers to my points raised would be good so that I can share them with Parish Council colleagues.

19. Impact of Fire Cover Model Proposal on Chipping Norton Crew and Town

- DAY COVER

Chipping Norton have worked exceptionally hard to recruit daytime on call crew. We have developed strong relationships with local businesses to release staff and have successfully targeted home workers. As a result we have 6 crew who release from work to respond, and an additional 2 new recruits on the March basic for daytime cover too.
Our daytime cover is an anomaly to many stations – Chipping Norton's oncall daytime crewing is really strong and still growing.

- SKILLS

We have a good spread of skills and experience at Chippy. We also have a WT level 1 joining us in February, and one of our experienced firefighters who gives cover every single day is also on his Level 1 ICD in March - both strengthening our daytime incident commander options to 4. In addition to this, we have plenty of drivers and BA wearers in our oncall day crew, so are competent as well as available.

- JOB LOSSES (if the proposals go ahead)

Immediate job losses for 50% of our crew who only give day cover in their contract

- LOSS OF NIGHT COVER

We have fewer crew contracted solely for nights (3). But we manage to keep the pump on using ad-hoc extra cover given by those with daytime contracts. If they lose their jobs they won't be able to give extra cover - without them there will be NO GUARANTEED FIRE COVER IN CHIPPING NORTON BETWEEN 6PM AND 6AM. The closest guaranteed appliance would come from Banbury. This longer response time gives a greater threat to life and property.

COMMUNITY Chipping Norton Crew are a community crew. The proposals state that Whole Time Day Cover would allow for "more community activities to take place" – This is untrue for Chipping Norton:

- We visit every school in the town every year, and also have them to station.
- We work with the local Scouts and Brownie groups for safety talks
- We undertake Safe and Well visits in the area to support vulnerable members of our community.
- We attend all local community events that we are invited to, such as fetes, festivals, Remembrance Day and Pride.

IN SUMMARY
At Chipping Norton we are almost at the point where we are fully self-sufficient. With the new level 1 incident commander coming through in March, and a WT level 1 incident commander joining us we will be stronger than ever after March 2026.
Day crewing Chipping Norton with whole-time would mean ***the loss of a dedicated local crew that are currently already available for daytime incidents***, and as a knock on, a loss of our fire engine at night. ***Please reconsider the WT Day Crew of Chipping Norton and use the resources elsewhere.***

OFRS consultation responses (emails and other correspondence) from individuals (redacted)

20. I have read the consultation document. Unfortunately, I do not have time to complete the survey. However, I do wish to comment.

I object to the closure of Rewley Road fire station. As a long term resident of Osney Island, I feel the need for a city centre station is essential. We have seen recently that there was a fire in the city centre at Mansfield College. There are old buildings in Oxford, which have a greater fire risk. I also object to making professional fire fighters redundant. These people do an amazing job, often putting their own lives at risk. And, sadly, losing them, as we saw at Bicester.

21. I think this proposal is not valid at all.As the whereabouts of the new venue for the new fire station in north Oxford has not yet been decided, how can you possible give accurate predictions on travel and say it will save time. It is well known it is a nightmare getting out of Oxford to travel north at the best of times, let alone in rush hour. This will add bad delays to any fire engine north to attend an event. Whereas having one in kidlington is more sensible. I think the new proposal is a bad move and the consultation has been cleverly structured to look good but in practice it will be a bad move. In addition the disruption to fire fighters , their lives, their work and extra load and their morale will be very bad. I do not support this consultation and I support keeping kidlington going.

22. I believe the main proposal is the best one. Reducing Rewley Road by one engine and using full time firefighters at that station.
If you combine Kidlington in the additional proposal, it is carefully worded but I am assuming the firefighters would lose their free housing and have to purchase or rent nearer the proposed joint station in North Oxford? The additional time suggested for appliances to reach fires if the stations were combined seems farcical.

23. I am writing this as an ex-Fire Officer who had organisational responsibility for Incident Command training and assessment, Organisational Health and Safety management and technical rescue provision and delivery.

Having read the proposals, they are written in such a way as to focus on the minutia - written in to prevent any real engagement by the public, who understandably do not have detailed knowledge and understanding of the Fire Service.

The Fire service is there to meet the provisions of the 2004 Fire and Rescue Services Act (service to the community); also to meet the requirement of the 1974 Health and Safety at Work Act in conjunction with the 1999 management of Health and Safety at Work Regulations (responsibility for the care of employees and the public through the way they work). These proposals significantly compromise both legal duties.

In reality, the proposals concern the completion of prevention duties and amount to a land grab within Oxford and Kidlington. Thankfully, prevention duties over the last 20 years have been effective in driving down emergency calls. This, along with increased standards of living and improvement in social behaviours (such as a reduction in smoking), have reduced operational calls. These advancements, however, will never remove the need for skilled operational response. I firmly believe that operational response has been neglected for many years and there has in my observation, been a significant decline in operational competence and effectiveness of crews in the emergency environment. Some of the personal qualities and attributes (PQAs) have been actively discouraged in the selection process. For example: a healthy risk appetite, adaptability, problem-solving and mental resilience. Additionally, neglect in the provision of training venues to ensure crews can maintain competence in their role and removal of the provision of a hot fire breathing apparatus venue are most concerning.

Most residents of Oxfordshire understand operational response as the key role of the fire service. In plain language - they are having a difficult day when they phone 999, and they need a response that will return the situation to the best version of normal possible.

One of the most significant and unrecognised cuts in this consultation is the disbandment of the specialist Rescue Tender. Its creation was designed to develop

enhanced specialist skills and to support Firefighter safety. This single point of failure has been in place for 40 years and never once failed. Since 1985 it has driven significant improvement across the organisation in Road Traffic Collision procedures leading to significantly improved outcomes for those affected. This also with improvements in animal rescue, water and flood response (2007), rope rescue and working a height. There are many people alive today due to the intervention of this team. I conducted approximately 1500 extrications of individuals from the most serious road accidents in a 13-year period. These were where the initial crews either had limited competence or equipment to resolve the incident.

One key element for the Rescue Tender is the selection process for already competent firefighter to do this role. They need to be fully competent and have a slow degradation of their base line skills to be able to take on the additional skills requires. They also need an aptitude for working in fast flowing flood water and at extreme height. Their personal resilience also needs to be at a heightened level as they are often the backstop, last line of defence at the most serious and complex incidents. This crew saved the two firefighters trapped under the door at Bicester Motion due to their willingness to step forward when others could not cope.

Clearly, the specialist equipment on this vehicle is not the fundamental component - it is the people and their willingness to respond. It takes a considerable time for individuals (years), combined with lots of practice to become competent in these skills. Oxfordshire rescue crews are (were) held up as an example of excellence by national training providers (Outreach, water rescue, and boat) to other Fire and Rescue services.

I will admit that I was part of this team for 15 years and I was instrumental in many of the changes and improvements that occurred. These changes were required to meet national guidance and legislation which were not being met at the time. Within this time, we did have some organisational support however there was an underlying dynamic and stated intentions for the vehicle to be split up, and families turned out of their homes (1995 to 2010). The proposals in the consultation will disband this close knit and effective team.

Additionally, there are no costings for additional vehicles to carry the equipment, or costings for the required mobilisation changes by fire control. There is no indication where they would be positioned. They could only go on the 24-hour crewed station if they are to be continually available. Some of these stations are positioned at the extremities of the County and would lead to extended attendance times. Mobilisation of these assets would then remove the fire cover from these areas. Specialist rescue incidents would need multiple responses from multiple teams to meet a single incidents needs due to crossover of skills.

A solution to this would be to move the vehicle on mass to the new Northern Gateway site along with the provision of quality housing for the 14 crew and their families who give 50% of their hours a year to supporting and protecting their community. Not ideal due to the impact on children and families, but a pragmatic solution. The council and organisation could then show a real example of them meeting the values they so

grandly promote but the cultural reviews of 2023-2024 so clearly showed was lacking. Build costs would be more than covered by the sale of the current housing stock.

The final driver for these changes is the strategic aim for alignment with the Thames Valley partners, Bucks and Royal Berks FRS. This is a fundamentally flawed concept and was an outcome of the failed regional fire control project. The creation of the Thames Valley Fire Control was a political need for some visible success after this catastrophic failure. From its inception, Thames Valley Fire Control has in no way provided the same level of diligent mobilisation and incident support provided by our own inhouse control. At its inception I was Health and Safety Manager for Oxfordshire Fire Service and was aware of significant failings in the mobilisation of the correct assets to the correct location. I raised this as a legislative issue under section 3 of the Health and Safety at Work Act (section 3 - changes in the way an organisation works) and requested visible records of this were kept within the health and safety management system (all mis-mobilisation should be recorded as a near miss). This did not occur and ironically, I was shortly after reassigned to my previous post as Command Training Manager.

I am aware that the situation has not significantly improved, especially around the mobilisation of specialist assets and alternative shift patterns. The underlying mobilisation software is agricultural, will not support any differences between the 3 organisations and has significant financial implications when making any changes.

All the proposed changes will require alterations within this mobilisation system for which there is no evidence of effective management.

I agree, that change is required; the retained/on-call model has been struggling for decades since the introduction of the part time workers regs. At this point many of our on-call stations were available 24/7. Over the last 20 years or so the organisation introduced a much more onerous administrative load on individuals trying to complete a full-time level of training and competence on two hours a week. In short, a group of individuals used to provide emergency cover to their local towns and village as part of the social responsibility and cohesion, and they had their own identity. It was enjoyable and achievable. Through poor management culture (namely bad leadership, lack of trust, favouritism leading to lowering of standards, disillusionment, and low morale) and imposed loads it has become onerous, and the joy has been lost.

I can evidence this through many personal connections around the County and the direct experience of my stepson. My professional roles on the Rescue Tender and in assessing command competence of the crew and watch managers from all these stations gave me 1:1 time with them. These decay is a direct result of a number of strategic decisions around recruitment competencies and organisational values. The additional scrutiny and load from management also created the 14 station support roles, which are all expensive management positions required to solve a problem introduced by this cultural change. A decision to allow direct entry to the wholetime role from the retained/on call has encouraged the perception that being on call is a stepping stone to a full-time job - and not a community commitment. Although people have always earned additional income from the retained role, this was never the driver for

carrying it out. Organisational culture is an underlying issue as identified in the recent report.

A definitive example is the recording of competence. This electronic system requires staff to maintain green traffic lights on their profile. Many hours are spent doing electronic multi choice quizzes to turn a competence green. All the quizzes can be passed by – shall we politely say -cheating. The records are therefore not a robust record of competence. It is a national issue. Operational response is a practical skill, not one gained through e-learning alone. This tedious task of administration prevents practical training in both the on-call and wholetime arena. As previously identified, resources are limited to achieve this.

Alternative ways to support additional cover would be to expand the recruitment pool. There are many individuals who would make good on-call firefighters within their local community who would not be able to meet the arbitrary answers of a PQA based interview. I know this from direct observation and inclusion within the interview process. Addressing the above described work load, management culture, and base line values for becoming an on-call firefighter would equally help. There are young men, many I would suggest with neurodiversity traits such as ADHD, or dyslexia, which would relish the pressure of the operational response role and physicality required, that do not see a space for them or their specific PQA's. 4% of Oxfordshire's population are ex-military, that is 23,000 people who are used to working in high-risk structured organisations who are not actively targeted or encouraged for the on-call role.

In summary, these changes proposed in the consultation will significantly increase risk to both people and property due to increased response times and a significant decrease in weight of response. This risk would affect the complex heritage property in central Oxford and to the population most significantly to the north and west of the city.

I maintain that the organisation will not be meeting its legislative requirement in the provision of a Fire and Rescue Service and the Health Safety at Work Act.

24. I think your planing to close fire stations is very shortsighted and will end up with loss of live and then an enormous amount of money to rectify.

More and more houses are being built everywhere with more and more traffic on the roads and you believe its a good idea to close fire stations that will increase response times and with fewer engines available.

Also how disrespectful to the memory of Jenny Logan and Martyn Sadler.

Please tell me how our council tax increases year on year but services decrease.

May some councillors on extortionate wages should lose their jobs instead of firefighter who save lives!

25. Only one question really we have had fire engines here in Kidlington for as long as I have lived here that's 67 years . But did here that our station was closing and being

moved to north Oxford I'm assuming summertown area? It that true. The problem arises when they are called out for north Kidlington that's about 2 minutes to here but for Kidlington as a whole from summertown that would be about 10 minutes. But when the stadium is built the A4160 the most direct route will be closed on match days then your appliances will have to go via the A44 route or islip if the Cherwell isn't in flood that would be 20-25 routes for both . You see our predicament. Besides your crews here are very good we don't want to lose them. TVP and south central ambulance have also raised this concern for there response times also. In addition planning permission for a further 4000 houses is going through now with CDC and if Kidlington becomes a town which is currently under discussion we would warrant retaining our fire, ambulance stations here and the police would also have a permanent station here for the public. Sorry to burden you but we're are very concerned about this

26. Unfortunately, I feel that there is little to no point with completing a survey since, from experience, a "consultation" is merely paying lip service to democracy, and their preferred decision will be made irrespectively.

Planning should not have been considered, let alone approved without the required infrastructure in place. However, we continuously observe that no lessons are learnt and existing services struggle to d