



## **Wyre Forest District**

### **Site Allocations and Policies Plan and Kidderminster Central Area Action Plan**

### **Examination**

### **Statement of Common Ground 6 (SOCG6)**

### **West Mercia Police and Hereford and Worcester Fire and Rescue Service**

14<sup>th</sup> January

**WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES AND  
KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN  
PUBLIC  
STATEMENT OF COMMON GROUND – WEST MERCIA POLICE AND HEREFORD &  
WORCESTER FIRE AND RESCUE SERVICE**

This “Statement of Common of Ground” has been developed in response to representations received from West Mercia Police and the Hereford and Worcester Fire and Rescue Service on the Pre-Submission Publication version of the Site Allocations and Policies and Kidderminster Central Area Action Plan DPD.

Officers from Wyre Forest District Council and representatives from West Mercia Police held a meeting on 05/12/2012 at which the representations listed below were discussed.

**Site Allocations and Policies**

- SALPP245
- SALPP246
- SALPP247
- SALPP248
- SALPP249
- SALPP250
- SALPP251
- SALPP252
- SALPP253
- SALPP254

The table attached at Appendix 1 outlines those areas where agreement has been reached on common ground for the Site Allocations and Policies.

Appendix 1 also sets out some proposed modifications to the Site Allocations and Policies in order to address the representations and establish Common Ground.

**Appendix 1 – Site Allocations and Policies - Actions arising from discussion with West Mercia Police and the Hereford and Worcester Fire and Rescue Service relating to the establishment of common ground.**

**Kidderminster Central Area Action Plan**

- KCAAP131
- KCAAP132
- KCAAP133
- KCAAP134
- KCAAP135
- KCAAP136
- KCAAP137
- KCAAP138
- KCAAP139
- KCAAP140
- KCAAP141

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- KCAAP142

The table attached at Appendix 2 outlines those areas where agreement has been reached on common ground for the Kidderminster Central Area Action Plan.

Appendix 2 also sets out some proposed modifications to the Kidderminster Central Area Action Plan in order to address the representations and establish Common Ground.

**Appendix 2 – Kidderminster Central Area Action Plan - Actions arising from discussion with West Mercia Police and the Hereford and Worcester Fire and Rescue Service relating to the establishment of common ground.**

APPENDIX 1 – WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES EXAMINATION IN PUBLIC  
STATEMENT OF COMMON GROUND – WEST MERCIA POLICE AND HEREFORD & WORCESTER FIRE AND RESCUE SERVICE

<b>West Mercia Police (WMP) and Hereford &amp; Worcester Fire and Rescue Service's (HWFRS) Representation</b>	<b>Paragraph / Policy</b>	<b>Director of Economic Prosperity and Place Response</b>	<b>Resulting Minor Amendment to the Site Allocations and Policies?</b>	<b>Response from WMP and HWFRS</b>	<b>Common Ground Established?</b>
<p><b><u>SALPP254</u></b> Paragraph 1.9 states that an Infrastructure Delivery Plan (IDP) supported the site selection process leading to the present SAPDPD publication document. WMP and HWFRS are aware that work by Wyre Forest District Council on the IDP is taking place in partnership with Worcestershire County Council's work on an Infrastructure plan for Worcestershire as a whole.</p> <p>To assist the two councils with respect to emergency service infrastructure planning matters, WMP commissioned consultants WYG to undertake a Strategic Infrastructure Assessment (SIA) to identify the police infrastructure required to serve growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy, Pre-submission Site Allocations and Policies DPD and the Pre-submission Kidderminster Central Area Action Plan.</p>	Paragraph 1.9	Comments are noted. The SIA will be used to help inform the development of both the County and the District Infrastructure Delivery Plans.	N/a	Agreed	Yes
<p><b><u>SALPP251</u></b> Businesses and communities require safe and secure environments within which to grow and flourish. Policy SAL.PFSD1 should therefore directly acknowledge that strong communities must be safe and secure communities.</p> <p>To resolve the inconsistencies described in Part 6 of these representations we suggest that Policy SAL.PFSD1 is amended as follows:</p>	Policy SAL.PFSD1	It is agreed that the proposed Minor Amendment would improve the effectiveness of the Plan.	<p><b>SALMOD01</b> Include the additional wording in Policy SAL.PFSD1, as follows:  "Planning applications that accord with the</p>	Agreed	Yes

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'Planning applications that accord with the policies and objectives in the DPDs...'			policies and objectives in the DPDs..."		
<p><b>SALPP248</b></p> <p>We welcome and support paragraph 4.13 and in particular the inclusion of the suggested wording proposed in our representations to the May 2011 Preferred Options document. In our view, the implementation of paragraph 4.13 in relation to new development proposals will ensure that town centres are more vibrant and safer places.</p>	Paragraph 4.13	Comments are noted and support is welcomed	N/a	N/a	Yes
<p><b>SALPP249</b></p> <p>Whilst we are supportive of our facilities being protected via Policy CP07, we are concerned the three tests of Policy SAL.DPL11 are unduly restrictive and onerous, as currently written, when applied to the emergency services. To resolve the issues of these representations, we suggest that the following additional paragraph is inserted beneath the three tests in Policy SAL.DPL11: -</p> <p><i>'When applying these tests to specific proposals the Council will have full regard to the specific characteristics, needs, service priorities and objectives of the service and/or organisation concerned.'</i></p>	Policy SAL.DPL11	Comments are noted. It is considered that this paragraph can be added to the Plan to improve the clarity of the Policy.	<p><b>SALMOD12</b></p> <p>Include the additional wording at the end of Policy SAL.DPL11, as follows:                      'When applying these tests to specific proposals the Council will have full regard to the specific characteristics, needs, service priorities and objectives of the</p>	Agreed	Yes

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			service and/or organisation concerned.'		
<p><b><u>SALPP250</u></b> WMP and HWFRS welcome and support Policy SAL.GPB2 and paragraph 5.35. In our view they help ensure that the SAPDPD complies with paragraphs 58, 69 and 156 of the National Planning Policy Framework. This will in turn help to reduce the number of crime and anti-social behaviour incidents within the District.</p>	Paragraph 5.35	Comments are noted and support is welcomed.	N/a	N/a	Yes
<p><b><u>SALPP247</u></b> WMP and HWFRS are pleased that the robust approach of policy CP02: 'Water Management' of the adopted Wyre Forest Core Strategy (December 2010) has been carried through into Policy SAL.CC7 and its supporting paragraphs. Having compared the outcomes of "Exercise Watermark" with Policy SAL.CC7 and its supporting paragraphs, we confirm that we support the text as written and commend the Council on their drafting.</p>	Policy SAL.CC7	Comments are noted and support is welcomed.	N/a	N/a	Yes
<p><b><u>SALPP246</u></b> We welcome and support the inclusion of part (vii) in Policy SAL.UP7, which requires development proposals to create a safe and secure environment that minimises opportunities for crime and antisocial behaviour, through the incorporation of Secured by Design principles. We commend the Council for the inclusion of this requirement in the Policy. We also commend the Council on the</p>	Policy SAL.UP7	Comments are noted and support is welcomed. Please see Minor Amendment for suggested change.	<b>SALMOD40</b> Include additional wording to the end of point vii. of the policy as follows: '...and have considered the	Agreed	Yes

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<p>inclusion of part (xii) in Policy SAL.UP7, which requires the provision of secure car parking with adequate natural surveillance.</p> <p>Policy SAL.UP7 should also require new development schemes to incorporate the following: -</p> <ul style="list-style-type: none"> <li>• Automatic water suppression systems</li> <li>• Adequate water supplies for fire fighting</li> <li>• Effective and efficient access for emergency vehicles</li> </ul> <p>The Chief Fire Officers' Association (CFOA), HWFRS and WMP strongly advocate the installation of automatic water suppression systems in <b>all</b> new housing and other developments. We will expect developers to install hydrants attached to the mains suitable for the purposes of fire fighting at their own expense, and to provide funds for their on going maintenance. Locations of hydrants should be approved in consultation with HWFRS. Where hydrants are not feasible suitable alternative water sources, such as gravity tanks, should be installed.</p> <p>To resolve all our concerns expressed in part 6 of these representations, we suggest the inclusion of the following additional design principle in Policy SAL.UP7: -</p> <p><i>(?) Include automatic water suppression systems, provide adequate water supplies for fire fighting and ensure effective and efficient access for emergency service vehicles</i></p>			<p>incorporation of fire safety measures.'</p>		

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<p><b><u>SALPP245</u></b> We welcome and support the inclusion of Policy SAL.UP9 and paragraphs 7.81 – 7.82 in the SAPDPD. We consider them to be excellent in the promotion of defensive gardening techniques and commend the Council on their drafting.</p>	<p>Policy SAL.UP9 and Paragraphs 7.81 – 7.82</p>	<p>Comments are noted and support is welcomed.</p>	<p>N/a</p>	<p>N/a</p>	<p>Yes</p>
<p><b><u>SALPP252</u></b></p> <p>It is important to be aware that the decision making of WMP and HWFRS with respect to how respond to the planned development growth proposed for Stourport-on-Severn is being structured through the Worcestershire 'Capital &amp; Assets Pathfinder' (CAP) initiative. As a result of further partnership work with Worcestershire County Council and other partners involved in CAP since May 2011, it is now (at the time of writing) the intention to move the organisations currently located at the County Buildings into a refurbished and modernised Civic Centre (Policy SAL.STC3) to create a multi-use community venue; capable of meeting present and future demands on service provision.</p> <p>The existing County Buildings (except for the fire station) would be demolished and the site sold by Worcestershire County Council for redevelopment. It is unknown whether the receipt from this would be put towards the cost of refurbishing and modernising the Civic Centre. It is important to stress however that all of these proposals are</p>	<p>Policy SAL.STC2</p>	<p>Comments are noted – please see suggested Minor Amendment</p>	<p><b>SALMOD58</b> Include the additional wording in Policy SAL.STC2, as follows: '...Proposals will need to ensure that compensatory provision is provided for the existing community uses <u>affected and for their expansion commensurate with development growth in Stourport-on-Severn</u> , if these are not to be retained on site, before</p>	<p>Agreed</p>	<p>Yes</p>



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<p>still at the feasibility stage and subject to change.</p> <p>We therefore consider that developer contributions, through the Community Infrastructure Levy (CIL), should be put towards the cost of redeveloping the Civic Centre to enable all the services to be located within it, not just WMP, to meet the expected increase in demand for services that is expected to arise.</p> <p>The wording of the final paragraph of Policy SAL.STC2 assumes that moving the different community uses from the County Buildings only requires compensatory provision for how they are now. The current wording makes no allowance for the fact that the community use concerned must have the capacity to expand in any new facility to meet the anticipated increase in demands on them, resulting from the delivery of planned development growth in Stourport-on- Severn.</p> <p>In our view this is unsound and ineffective infrastructure planning, contrary to paragraph 182 of the National Planning Policy Framework, as it takes no account of the impact of development growth upon the ability of the community uses to continue to deliver services as Stourport-on-Severn develops. The amendment to the final paragraph of Policy SAL.STC2, as set out below, is consequently required to resolve this fundamental issue.</p>			<p>considering any future redevelopment.'</p>		

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<p>'...Proposals will need to ensure that compensatory provision is provided for the existing community uses <b>affected and for their expansion commensurate with development growth in Stourport-on-Severn</b> , if these are not to be retained on site, before considering any future redevelopment.'</p>					
<p><b><u>SALPP253</u></b></p> <p>The relocation of WMP is to be undertaken as part of the ' <i>Capital &amp; Assets Pathfinder</i> ' (CAP) initiative, which involves proactive partnership work between WMP, HWFRS, Worcestershire County Council, Wyre Forest District Council and other partners. Any upgrading of the Stourport-on-Severn fire station will also be co-ordinated through CAP.</p> <p>However, the current wording of Policy SAL.STC3 and supporting paragraph 12.12 makes no reference at all to the above. They both instead imply that there are a number of options are being considered, one of which being the complete redevelopment of the Civic Centre site. This invites the question that if a number of options are being explored, why should WMP, or any other CAP partner, put finance/resources into refurbishing the Civic Centre when it may ultimately be demolished and replaced with an alternative development?</p> <p>To fully resolve the issues highlighted in Part 6 of these</p>	<p>Policy SAL.STC3</p>	<p>Comments are noted. The policy is specifically flexible to allow a number of uses to be considered on this site - including what has been mention in the representations. However, in order to aid clarity it is proposed to include the suggested change to the policy wording as part of a Minor Amendment to the Plan. In terms of subsequent 'protection' of facilities it is considered that this would be adequately covered under Policy</p>	<p><b>SALMOD59</b> Include the additional wording in Policy SAL.STC3, as follows: Community Uses (D1 and D2 , <i>including police and fire services</i> )</p>	<p>Agreed</p>	<p>Yes</p>

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<p>representations and improve the effectiveness of Policy SAL.STC3, we recommend the following amendment: - <i>Community Uses (D1 and D2 , including police and fire services )</i></p> <p>In addition, we recommend the following amendments to paragraph 12.12: -</p> <p>The policy position for this site reflects the sites central location and potential to provide a vibrant mixed use development. The Civic Centre currently performs as important role in the community and therefore redevelopment options should ensure that appropriate provision is retained and provided for community uses <b>in the first instance, or compensatory provision provided for</b> such uses.</p>		SAL. DPL11: Community Facilities.			

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West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service's (HWFRS) Representation	Paragraph / Policy	Director of Economic Prosperity and Place Response	Resulting Minor Amendment to the Site Allocations and Policies?	Response from WMP and HWFRS	Common Ground Established?
<p><b><u>KCAAPP138</u></b></p> <p>Paragraph 1.17 states that an Infrastructure Delivery Plan (IDP) supported the site selection process leading to the present KCAAP publication document. WMP and HWFRS are aware that work by Wyre Forest District Council on the IDP is taking place in partnership with Worcestershire County Council's work on an infrastructure plan for Worcestershire as a whole.</p> <p>To assist the two councils with respect to emergency service infrastructure planning matters, WMP commissioned consultants WYG to undertake a Strategic Infrastructure Assessment (SIA) to identify the police infrastructure required to serve growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy, Pre-submission Site Allocations and Policies DPD and the Pre-submission Kidderminster Central Area Action Plan DPD.</p>	Paragraph 1.17	Comments are noted. The SIA will be used to help inform the development of both the County and the District Infrastructure Delivery Plans.	N/a	Agreed	Yes
<p><b><u>KCAAP142</u></b></p> <p>WMP and HWFRS welcome and support the inclusion of a Vision statement within the KCAAP. This constitutes a significant improvement on the Preferred Options paper and an acceptance of our previous representations regarding this particular</p>	Vision	Comments are noted and support is welcomed. Please see Minor Amendment for suggested change.	<p><b>KCAPMOD02</b></p> <p>Include additional wording in the vision as follows:</p> <p>'...The town centre will be a</p>	Agreed	Yes

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<p>issue.</p> <p>Whilst we support the vision of a safe environment, with streets, spaces and buildings designed to promote activity and natural surveillance, we would like to see the wording of the third paragraph expanded as follows:</p> <p><i>'...The town centre will be a vibrant, attractive , <b>safe and crime free</b> environment in which people wish to spend their time at all times of the day and night...'</i></p>			<p>vibrant, attractive , <u>safe and crime free</u> environment in which people wish to spend their time at all times of the day and night...'</p>		
<p><b><u>KCAAP140</u></b></p> <p>Whilst we are supportive of Strategic Objective 12 in so far as it is currently written, we are very concerned that there is no reference to ensuring that Kidderminster is crime free.</p> <p>This is inconsistent with paragraphs 58 and 69 of the National Planning Policy Framework, which clearly state that planning policies and decisions should create safe and accessible environments there crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</p> <p>In view of our comments above, we suggest that part 12 of the Strategic Objectives is amended as</p>	<p>Strategic Objectives</p>	<p>Comments are noted. Please see Minor Amendment for suggested change.</p>	<p><b>KCAPMOD04</b></p> <p>Include additional wording in Strategic Objective 12, as follows:</p> <p>12. Ensure the town is safe, <u>crime free</u> and enjoyable for all users</p>	<p>Agreed</p>	<p>Yes</p>

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follows: - <i>12. Ensure the town is safe, <b>crime free</b> and enjoyable for all users.</i>					
<p><b><u>KCAAP131</u></b></p> <p>We welcome and support the requirement in the housing and mixed use development objectives for new developments to create a safe environment which reduces the opportunities for crime.</p> <p>We are grateful to the Council for taking into account our representations to the Preferred Options (May 2011) document in this respect.</p>	Housing and Mixed Use Development Objectives	Comments are noted and support is welcomed	N/a	N/a	Yes
<p><b><u>KCAAP133</u></b></p> <p>The policy, as written, makes no reference to the emergency services as one of the uses that can contribute to supporting the vitality and viability of the town centre.</p> <p>The lack of reference to the emergency services as part of mixed use developments, which in turn contribute to the vitality and viability of the town centre, could potentially inhibit partnership working in relation to such schemes. By creating uncertainty as to whether the emergency services are a legitimate use within mixed use schemes, this in turn casts doubt on whether other parties should involve them in negotiations. This could in</p>	Policy KCA.DPL2	Comments are noted. Please see Minor Amendment for suggested change.	<p><b>KCAPMOD06</b></p> <p>Include additional wording in the policy as follows:</p> <p>Community uses (including medical and the emergency services )</p>	Agreed	Yes

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<p>turn affect the delivery of community safety, particularly given that some of the proposed mixed use developments involve creating an evening and night-time economy in Kidderminster.</p> <p>To resolve all of the concerns expressed above, we request that the following amendment is made to Policy KCA.DPL2:-</p> <p><input checked="" type="checkbox"/> Community uses (including medical <b>and the emergency services</b> )</p>					
<p><b><u>KCAAP134</u></b></p> <p>The Strategic Infrastructure Assessment (SIA) prepared by consultants WYG, submitted in support of these representations, confirms that tourism related development places significant additional demands on the police and emergency services.</p> <p>This is implicitly acknowledged by paragraph 5.57 of the KCAAP, which notes that Kidderminster unfortunately suffers from a negative reputation amongst the canal boating community, due to antisocial behaviour and vandalism.</p> <p>The absence of an explicit reference to the need to create a safe and crime free environment, as part of this overarching policy on tourism related</p>	<p>Policy KCA.GPB6</p>	<p>Comments are noted. Please see Minor Amendment for suggested change.</p>	<p><b>KCAPMOD11</b></p> <p>Include additional wording in the policy as follows:            ‘...Within these areas, <u>development which is demonstrated to create a safe, enjoyable and crime free environment will be supported.</u>            Development for the following uses will also be specifically encouraged:...’</p>	<p>Agreed</p>	<p>Yes</p>

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<p>development, is inconsistent with Policy KCA.GPB7 which does implicitly acknowledge these issues.</p> <p>In view of all of the above, the absence of a reference in policy to the need to ensure that tourist related development is safe, enjoyable and crime free is unjustified. It is also likely to mean that the KCAAP will be ineffective in delivering genuinely sustainable tourist related development from a social perspective, as required by paragraph 7 of the National Planning Policy Framework.</p> <p>To resolve all our concerns and make the KCAAP sound, we suggest the inclusion of the following addition text in Policy KCA.GPB6: - <i>'...Within these areas, development <b>which is demonstrated to create a safe, enjoyable and crime free environment</b> for the following uses will be specifically encouraged:...'</i></p>					
<p><b><u>KCAAP135</u></b></p> <p>There is a need for robust guidance to address the KCAAP specific problems, but also to address the lack of policy in the NPPF covering the evening and night-time economy.</p> <p>The DPD does not go far enough in terms of:</p>	<p>Policy KCA.GPB7</p>	<p>Comments are noted. The Council have considered these representations further, in consultation with West Mercia Police and have agreed the following amendment to the plan,</p>	<p><b>KCAPMOD14</b> Include additional wording in the policy as follows:  The District Council will encourage developments that enhance the evening and night time leisure offer</p>	<p>Agreed</p>	<p>Yes</p>



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<p>1. Setting out in a clear and concise way where and when evening and night-time economy related development will be located and delivered within Kidderminster.</p> <p>2. Providing sufficient policy and supporting guidance in terms of explaining how the well documented negative side effects of evening and night-time economy related development will be actively managed.</p> <p>3. Establishing the basis by which public sector agencies, private companies and other stakeholders will work together to coordinate the active management of the evening and night-time economy in Kidderminster town centre.</p> <p>4. Providing sufficient encouragement for development proposals relating to the evening and night-time economy to: -</p> <ul style="list-style-type: none"> <li>• Locate in preferred locations for this type of development</li> <li>• Positively integrate with surrounding uses</li> <li>• Provide a high quality, safe and secure public realm.</li> </ul> <p>It would be preferable if the KCAAP included</p>		<p>which is an approach supported by both parties.</p>	<p>of the town centre. <u>A balanced mix of uses will be specifically encouraged, including late-night shopping, cafes, restaurants, bars, take-aways, clubs and cultural activities.</u></p> <p><u>No development should on its own, or cumulatively with other uses, create an unacceptable impact on neighbouring uses or the surrounding area by reasons of noise pollution, light pollution, anti-social behaviour, crime, disturbance or traffic.</u></p> <p><u>Developments should seek to ensure activity during the daytime to avoid the clustering of 'dead' frontages.</u></p> <p><u>Developments linked to the evening economy will be required to contribute towards public realm and infrastructure improvements in order to improve the sense of well being, safety and security within the town. Contributions to improving the public transport for</u></p>		

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West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service's (HWFRS) Representation	Paragraph / Policy	Director of Economic Prosperity and Place Response	Resulting Minor Amendment to the Site Allocations and Policies?	Response from WMP and HWFRS	Common Ground Established?
<p>specific policy and detailed supporting guidance in relation to the evening and night-time economy.</p> <p>As stated in our representations to the Preferred Options (May 2011), we would ideally like to see the KCAAP include planning policies and supporting guidance on the evening and night-time economy to the same level of detail as that included on pages 80 – 83 of the Central Telford Area Action Plan (adopted March 2011), prepared by Telford &amp; Wrekin Council.</p> <p>We would be very willing to actively collaborate with the Council in the preparation of such guidance in the lead up to the KCAAP public examination and/or during.</p>			<p><u>the benefit of the evening economy will be particularly encouraged.</u></p> <p><u>Working in partnership with the Council and other stakeholders, owners and operators of evening economy related development will be expected to take part in active management measures to help the public and support the emergency services.</u></p> <p><u>Developments linked to the evening economy should also have specific regard to Policy KCA.UP1 and ensure that development incorporates 'Secured by Design Principles'</u></p> <p>Include additional wording to the Reasoned Justification for the policy as follows:</p> <p><u>Although the District Council wishes to enhance the evening economy of the town centre, it is important to ensure that new developments do not cause an</u></p>		

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			<p><u>unacceptable nuisance to neighbouring uses and the surrounding environment.</u>  <u>Increased activity in the evening provides important additional natural surveillance and vitality to streets and spaces in the town.</u>  <u>However, consideration must also be given for the potential of these uses to generate issues of anti-social behaviour, particularly but not exclusively in respect to pubs and bars. The District Council will look to work with West Mercia Police and the Wyre Forest Community Safety Partnership (WFCSP), as well as other town centre stakeholders, to tackle any issues of crime and anti-social behaviour that may arise from an increase in evening activity through public realm improvements, active management measures or new security infrastructure.</u></p> <p><u>The Kidderminster Town Team, established as a result of a recommendation from the Government commissioned Mary</u></p>		

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			<p><u>Portas's High Street Review, is a partnership of public and private stakeholders who work together and aim to produce innovative ideas about how to improve the town. Working with the Police and the Community Safety Partnership the Town Team will have a role in bringing forward anti-social behavior initiatives such as 'Pubwatch' and 'Best Bar None' schemes to help tackle anti-social behavior.</u></p> <p><u>The District Council will encourage the existing and new operators of evening orientated uses such as cafes, restaurants, bars, take-always, clubs and other cultural activities to work with the Town Team, WFCSP and the Police in managing the evening economy.</u></p>		
<p><b><u>KCAAP141</u></b></p> <p>The current Urban Design and Place Making Objectives currently make no reference to minimising the opportunities for crime and antisocial behaviour. If left unaddressed, this issue will affect the</p>	<p>Urban Design and Place Making Objectives</p>	<p>Comments are noted. Please see Minor Amendment for suggested change.</p>	<p><b><u>KCAPMOD19</u></b></p> <p>Include an additional bullet point in the objectives as follows: <u>Create a safe and secure environment which</u></p>	<p>Agreed</p>	<p>Yes</p>

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<p>resulting effectiveness of the KCAAP once it has been adopted by the Council. To fully resolve the consistency and effectiveness issue, we suggest the following additional bullet point is inserted into the Urban Design and Place Making Objectives: -</p> <p><i>Create a safe and secure environment which reduces opportunities for crime and antisocial behaviour.</i></p>			<p><u>reduces opportunities for crime and anti-social behaviour.</u></p>		
<p><b><u>KCAAP136</u></b></p> <p>We commend the Council on the inclusion of part (j) in Policy KCA.UP1, which requires development proposals to create a safe and secure environment that minimises opportunities for crime and antisocial behaviour, through the incorporation of Secured by Design principles. We also commend the Council for the inclusion of parts (b) and (e) in Policy KCA.UP1, which promote the creation of safe environments subject to natural surveillance.</p> <p>We are grateful to the Council for taking into account our previous representations to the Preferred Options (May 2011) document on this matter. The inclusion of part (j) particularly in</p>	<p>Policy KCA.UP1</p>	<p>Comments are noted and support is welcomed. Please see Minor Amendment for suggested change.</p>	<p><b>KCAPMOD21</b></p> <p>Include additional wording to the end of point j. of the policy as follows: <u>'..., and consider the incorporation of fire safety measures.'</u></p>	<p>Agreed</p>	<p>Yes</p>

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<p>Policy KCA.UP1 will ensure that new developments comply with a nationally recognised consistent standard, which in turn will mean they contribute to the achievement of Government's objectives set out in paragraphs 58 and 69 of the National Planning Policy Framework.</p> <p>We are, however, of the view that Policy KCA.UP1 should also require new development schemes to incorporate the following: -</p> <ul style="list-style-type: none"> <li>• Automatic water suppression systems</li> <li>• Adequate water supplies for fire fighting</li> <li>• Effective and efficient access for emergency vehicles</li> </ul> <p>The Chief Fire Officers' Association (CFOA), HWFRS and WMP strongly advocate the installation of automatic water suppression systems in <b>all</b> new housing and other developments. We will expect developers to install hydrants attached to the mains suitable for the purposes of fire fighting at their own expense, and to provide funds for their on going maintenance. Locations of hydrants should be approved in consultation with HWFRS. Where hydrants are not feasible suitable alternative water sources, such as gravity tanks, should be installed. Finally, the design of new housing and other developments must ensure that the emergency services can access all areas and</p>					

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<p>buildings. It is important to remember in this respect that each specific development will have implications for WMP and HWFRS e.g. the need to ensure that WMP personnel can attend quickly in the event of a domestic incident, or ensuring that HWFRS personnel can attend rapidly in the event of a fire. To resolve all our concerns expressed in these representations, we suggest the inclusion of the following additional design principle in Policy KCA.UP1: -</p> <p><i>(?) Include automatic water suppression systems, provide adequate water supplies for fire fighting and ensure effective and efficient access for emergency service vehicles.</i></p>					
<p><b><u>KCAAP137</u></b></p> <p>As the KCAAP acknowledges in paragraphs 5.57 and 7.51, there are unfortunately continuing problems of crime and antisocial behaviour along the Staffordshire and Worcestershire Canal.</p> <p>Whilst we support the assertion that increasing natural surveillance and active frontages along the canal will help deter crime and antisocial behaviour, the current wording implies that this is all that is required. If the policy is implemented as currently</p>	<p>Policy KCA.UP5</p>	<p>Comments are noted. Please see Minor Amendment for suggested change.</p>	<p><b>KCAPMOD24</b> Replace criteria i of Policy KCA.UP5, with the following:</p> <p>(i) Create a safe, secure and crime free environment through providing active frontages, natural surveillance, incorporation of Secured by Design principles and supporting security infrastructure</p>	<p>Agreed</p>	<p>Yes</p>

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<p>written, it will not achieve its objective of significantly reducing crime and antisocial behaviour along the Staffordshire and Worcestershire Canal.</p> <p>To resolve the issues highlighted above, we suggest the insertion of the following bullet point in place of the existing part (i) of Policy KCA.UP5:-</p> <p><b><i>(i) Create a safe, secure and crime free environment through providing active frontages, natural surveillance, incorporation of Secured by Design principles and supporting security infrastructure where necessary.</i></b></p>			where necessary.		
<p><b><u>KCAAP139</u></b></p> <p>We welcome and support the confirmation in paragraph 9.16 of the KCAAP that the regeneration of the Churchfields area will require further investment in emergency service facilities. We are grateful to the Council for taking into account our previous representations to the Preferred Options (May 2011) document in this respect.</p> <p>Under the terms of Policy KCA.Ch2, the three high rise tower blocks will be demolished to make way for 100 dwellings. Whilst WMP and HWFRS do not</p>	Paragraph 9.16	Comments are noted and support is welcomed. Officers have considered the responses and have suggested a minor amendment to the plan to refer to community facilities as a whole, as this will protect all uses of this type and not specifically refer to a particular type, as proposed through this representation.	<p><b>KCAPMOD31</b></p> <p>Include additional wording in Paragraph 9.16, as follows:</p> <p>'The Churchfields Masterplan sets out the priority areas for development contributions which includes off-site highways works, public transport and affordable housing. However, contributions will also be sought for other important</p>	Agreed	Yes



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<p>oppose the redevelopment, it will result in the loss of a Police Post that delivers policing services to the entire Churchfields area. We therefore respectfully request that compensatory provision of a new Police Post is provided either within Grasmere Close or in another, mutually acceptable, part of the regeneration scheme.</p> <p>The Council should also be aware that a successful regeneration scheme will require the incorporation of measures to prevent and contain fires alongside emergency services infrastructure. Unless there is acknowledgment in the KCAAP that the above measures may be required, they will most likely not be incorporated at all to the detriment of the safety of those living and working there. This will in turn harm the effectiveness of the KCAAP in facilitating a successful regeneration scheme.</p> <p>To resolve the issues highlighted in Part 6 of these representations, we request that the following additional text is inserted into paragraph 9.16 of the KCAAP: -</p> <p><i>'The Churchfields Masterplan sets out the priority areas for development contributions which includes off-site highways works, public transport</i></p>			<p>infrastructure including education, drainage infrastructure, emergency services <u>and community facilities, where appropriate.</u></p>		

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<p><i>and affordable housing. However, contributions will also be sought for other important infrastructure including education, drainage, infrastructure , emergency services (<b>compensatory provision of a Police Post</b>) and <b>water suppression systems.</b></i></p>					
<p><b><u>KCAAP132</u></b></p> <p>Whilst WMP and HWFRS do not oppose the redevelopment, it will result in the loss of a Police Post that delivers policing services to the entire Churchfields area. We therefore respectfully request that compensatory provision of a new Police Post is provided either within Grasmere Close or in another, mutually acceptable, part of the Churchfields regeneration scheme.</p> <p>We therefore suggest the following amendments to Policy KCA.Ch2: -</p> <p><i>Phase 1 – Grasmere Close</i>  <i>The redevelopment of this area will be expected to include:</i></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> C3 Dwelling House</li> <li><input checked="" type="checkbox"/> <b>Community Uses (D1, including Police</b></li> </ul>	<p>Policy KCA.Ch2</p>	<p>Comments are noted. A Minor Amendment has been suggested to the plan but with slightly different wording to that proposed through this representation.</p>	<p><b>KCAPMOD32</b>            Include additional wording in Policy KCA.CH2, as follows:</p> <p>Phase 1 – Grasmere Close            The redevelopment of this area will be expected to include:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> C3 Dwelling House</li> <li><input checked="" type="checkbox"/> Community Uses (D1, <u>including Police Post</u>)</li> </ul> <p>Any new development on this site should:</p> <ol style="list-style-type: none"> <li>1. Provide a strong frontage along Stourbridge Road and Hurcott Road.</li> <li>2. Provide active frontages and sense of enclosure to all roads</li> </ol>	<p>Agreed</p>	<p>Yes</p>

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<p><b>Post)</b></p> <p><i>Any new development on this site should:</i></p> <ol style="list-style-type: none"> <li>1. Provide a strong frontage along Stourbridge Road and Hurcott Road.</li> <li>2. Provide active frontages and sense of enclosure to all roads within the site.</li> <li>3. <b>Ensure that compensatory provision is provided for the existing Police Post, if this is not to be retained on site, before considering any future redevelopment.</b></li> </ol> <p><i>Reasoned Justification</i></p> <p>9.21 The Community Housing Group owns the site <b>which currently consists of maisonette blocks and a Police Post. It is proposed to redevelop the site with a scheme for more traditional houses. The redevelopment of this site will provide up to 100 dwellings and will provide a more attractive environment.</b></p>			<p>within the site.</p> <p>3. Have regard to Policy SAL.DPL11 <u>when considering any redevelopment involving the existing Police Post.</u></p> <p>Include additional Reasoned Justification as follows:</p> <p>9.21 The Community Housing Group owns the site , <u>which currently consists of maisonette blocks, tower blocks and a Police Post. It is proposed to redevelop the site with a scheme for more traditional houses. The redevelopment of the Maisonettes</u> will provide up to 100 dwellings and will provide a more attractive environment.</p>		