

# Redditch Borough Council



## Borough of Redditch Local Plan No.4

### Examination in Public

### Statement of Common Ground

### West Mercia Police and Hereford & Worcester Fire and Rescue Service (1335)



22 September 2014

## **BOROUGH OF REDDITCH LOCAL PLAN NO.4 EXAMINATION IN PUBLIC STATEMENT OF COMMON GROUND – WEST MERCIA POLICE AND HEREFORD & WORCESTER FIRE AND RESCUE SERVICE**

This Statement of Common Ground has been developed in response to representations received from West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS) on the Proposed Submission version of the Borough of Redditch Local Plan No.4 (BORLP4).

Officers from Redditch Borough Council and representatives of WMP and HWFRS held a meeting on 18 September 2014 at which the representations listed below were discussed:

- Page 4, Local Challenges
- Page 10, Local Portrait, paragraph 3
- Page 16, Vision, fifth bullet point
- Page 20, Objectives, Objective 7
- Pages 79 - 82, Policy 31 and Reasoned Justification
- Page 86, Policy 34, criterion v
- Page 101, Policy 40, criterion vi
- Page 102, Policy 40, Reasoned Justification, paragraph 3
- Page 103, Policy 41
- Pages 113 – 131, Policies 46 – 49
- Appendix 4, Policies 40 and 41

The table attached at Appendix 1 details where agreement has been reached on common ground. It also includes some additional suggested minor changes to the Borough of Redditch Local Plan No.4.

These have been completed in a similar format to the BORLP4 Schedule of Minor Changes to Submission Document March 2014 (CDR1.2), which records and highlights minor editorial corrections, amendments, factual updates and clarifications to the BORLP4 as it appeared when submitted to the Planning Inspectorate.

The alterations detailed in Appendix 1 are not considered to represent changes that would need to be consulted upon, as they do not have any material effect on the meaning or direction of the plan and its policies. They represent instead an opportunity to make minor alterations to the plan to improve its readability, clarity, accuracy and are commended to the Inspector on that basis.

The page and paragraph references relate to those in the **Proposed Submission** version of BORLP4, as some alterations to the Submission version of the Plan have caused page numbers to alter.

APPENDIX 1 – BOROUGH OF REDDITCH LOCAL PLAN NO.4 (BORLP4) EXAMINATION IN PUBLIC  
STATEMENT OF COMMON GROUND – WEST MERCIA POLICE AND HEREFORD & WORCESTER FIRE AND RESCUE SERVICE

Paragraph / Policy	Summary of West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service's (HWFRS) Representation	Redditch Borough Council Response	Resulting Amendment? (new or amended text has been underlined)	Response from WMP and HWFRS	Common Ground Established?
Page 4, Local Challenges	<p>Whilst welcoming the identification of creating safe and attractive places to live and work as a Local Challenge, WMP and HWFRS are concerned that the supporting wording suggests that design measures alone will resolve crime, anti-social behaviour and community safety issues. WMP and HWFRS propose that it be amended as follows:</p> <p><i>'Creating safe, attractive <u>and low crime</u> places to live and work:</i></p> <ul style="list-style-type: none"> <li><i>Redditch suffers from a poor perception of crime and anti-social behaviour. <u>The implementation of designing out crime, active management measures and improved infrastructure can help reverse this perception.</u></i></li> </ul>	<p>Comments are noted. The Council has considered these representations further, in consultation with WMP and HWFRS. It is agreed that minor amendments to Objective 7 and Policy 40 (see below) would resolve them and improve the effectiveness of the BORLP4.</p>	<p>See minor amendments to Policy 40 below.</p>	<p>Agreed</p>	<p>Yes</p>
Page 10, Local Portrait, paragraph 3	<p>WMP and HWFRS welcome and support the Local Portrait; in particular endorsing the description given of crime and community safety in the Borough.</p>	<p>Comments are noted and support is welcome.</p>	<p>N/A</p>	<p>N/A</p>	<p>Yes</p>
Page 16, Vision	<p>Whilst WMP and HWFRS support the Vision of creating safe and attractive places to live and work, it should also make reference to the need to create places that are crime free. WMP and HWFRS propose that the Vision be</p>	<p>Support is welcome and Comments are noted. The Council has considered these representations further, in</p>	<p>None</p>	<p>Agreed</p>	<p>Yes</p>

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	<p>amended as follows:</p> <p><i>'Creating safe, attractive <u>and crime free</u> places to live and work'</i></p>	<p>consultation with WMP and HWFRS. The Council believes that 'Safe' encapsulates the desire to be crime free. It is agreed that minor amendments to Policy 40 (see below) would resolve issues and improve the effectiveness of the BORLP4.</p>			
<p>Page 20, Objectives, Objective 7</p>	<p>WMP and HWFRS welcome and support Objective 7, in so far that it requires the reduction of crime and anti-social behaviour in order to deliver the Vision. However, design can never create an environment that is free from crime and the fear of crime, unless it is accompanied by active management measures and supporting infrastructure. This view is supported by paragraph 156 of the National Planning Policy Framework (NPPF), which states that local planning authorities should include strategic policies to delivery security infrastructure for their area. WMP and HWFRS propose the following amendment to Objective 7:</p> <p><i>'7. Reduce crime and anti social behaviour and the fear of crime through high quality design <u>and infrastructure provision</u>, with regeneration achieved at Matchborough, Winyates and Woodrow District Centres.'</i></p>	<p>Support is welcome and comments are noted. The Council has considered these representations further in consultation with WMP and HWFRS. It is agreed that including a reference to infrastructure in Objective 7 would improve its effectiveness and consistency with the NPPF.</p>	<p>Include the additional wording in Objective 7 as follows:</p> <p><i>'Reduce crime and anti social behaviour and the fear of crime through high quality design <u>and infrastructure</u>, with regeneration achieved at Matchborough, Winyates and Woodrow District Centres.'</i></p>	<p>Agreed</p>	<p>Yes</p>

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Pages 79 – 82, Policy 31 and Reasoned Justification	<p>There is currently an absence of sufficient policy provision in the BORLP4 covering the evening and night-time economy. Whilst WMP and HWFRS support part (iii) of Policy 31 and paragraph 1 of the Reasoned Justification, they do not go far enough in terms of:</p> <ol style="list-style-type: none"> <li>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 Redditch Borough.</li> <li>2. Providing sufficient policy and supporting guidance in term of explaining how the well documented negative side effects of evening and night-time economy related development will be actively managed.</li> <li>3. Establishing the basis by which relevant parties will work together to coordinate the active management of the evening and night-time economy.</li> <li>4. Providing sufficient encouragement for development proposals relating to the evening and night-time economy to: <ul style="list-style-type: none"> <li>• Locate in preferred locations for this type of development.</li> <li>• Positively integrate with surrounding uses</li> </ul> </li> </ol>	<p>Comments are noted. The Council has considered these representations further in consultation with WMP and HWFRS. It is agreed that specific policy and guidance on evening and night-time economy related development is required for the Borough. It is further agreed that this will be provided in the forthcoming Allocations Plan, which will be prepared following the adoption of the BORLP4. This new policy and guidance will be prepared in full consultation with the emergency services.</p>	None	Agreed	Yes

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	<ul style="list-style-type: none"> <li>Provide a high quality, safe and secure public realm.</li> </ul> <p>It would be preferable if the BORLP4 included planning policy and supporting guidance in relation to this type of development equivalent to:</p> <ul style="list-style-type: none"> <li>Policy KCA.GPB7 and supporting paragraphs 5.66 – 5.37 of the Kidderminster Central Area Action Plan (adopted July 2013), prepared by Wyre Forest District Council.</li> <li>Pages 80 – 83 of the Central Telford Area Action Plan (adopted March 2011), prepared by Telford &amp; Wrekin Council.</li> </ul>				
Page 86, Policy 34 and Reasoned Justification	<p>Whilst we welcome and support the recognition given to Secured by Design, it will require active management measures and additional infrastructure also to ensure community safety and low-crime in District Centres. Therefore, Policy 34 and its Reasoned Justification do not comply with the NPPF. Nor are they in accordance with the Council's own Infrastructure Delivery Plan as presently drafted, for the same reason.</p>	<p>The purpose of Policy 34 is to enable the revitalisation of District Centres, through proposals designed to improve the existing built environment of them. Following consultation with WMP and HWFRS, it is agreed that the minor amendments to Policy 40 (see below) will resolve the effectiveness and</p>	None	Agreed	Yes

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		consistency with the NPPF concerns raised in relation to Policy 34.			
Pages 101 – 102, Policy 40 and Reasoned Justification	<p>WMP and HWFRS commend the Council for the inclusion of parts (vi) and (viii) of Policy 40, which require developments to meet 'Secured by Design' standards. However, design measures alone will not ensure safer communities. Additional infrastructure provision and active management measures will be required also. Amendments to Policy 40 and its Reasoned Justification would improve its effectiveness and enable consistency with paragraphs 7, 17, 70, 156, 157, 158, 162, 177, 180 and 182 of the NPPF. Amendments would also provide support for the delivery of the Infrastructure Delivery Plan, which recognises that ensuring safer communities is dependant on infrastructure provision for the emergency services in-step with development growth.</p> <p>Further, WMP and HWFRS recommend that Policy 40 and its Reasoned Justification make reference to the need for fire safety measures to be included in new development. Such measures are proven to reduce deaths, injuries and property damage resulting from fire.</p>	Comments are noted and support is welcome. The Council has considered these and other representations (see above) further in consultation with WMP and HWFRS. It is agreed that minor amendments to Policy 40 and its Reasoned Justification would improve their effectiveness and consistency with the NPPF. This in turn will ensure the delivery of high quality design and safer communities in the Borough by the BORLP4.	<p>Include additional wording to criterion (vi) of Policy 40 as follows:</p> <p><i>'encourage community safety and 'design out' vulnerability to crime by incorporating the principles, concepts and physical security standards of the 'Secured by Design' award scheme; <u>providing infrastructure for policing and emergency services; and considering the incorporation of fire safety measures;</u></i></p> <p>Include additional wording to paragraph 3 of the Reasoned Justification to Policy 40 as follows:</p> <p><i>'The 'Secured by Design'</i></p>	Agreed	Yes

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			<p><i>award scheme focuses on crime prevention at the design, layout and construction stages of homes and commercial premises and promotes the use of security standards (<a href="http://www.securedbydesign.com">www.securedbydesign.com</a>). Redditch Borough Council and North Worcestershire Community Safety Partnership will publicise and promote developments that achieve Secured by Design Standards. This scheme or any relevant scheme at the time should be adhered to in order to encourage community safety and 'design out' vulnerability to crime. <u>New development can put additional pressure on the infrastructure of West Mercia Police and Hereford &amp; Worcester Fire and Rescue Service. Proposals should make provision for this infrastructure as identified in the IDP to ensure that</u></i></p>		



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			<u>Redditch Borough is a safe and attractive place to live and work.'</u>		
Page 103, Policy 41	WMP and HWFRS welcome and support Policy 41 and in particular that shopfronts should achieve 'Secured by Design' standards.	Comments are noted and support is welcomed.	N/A	N/A	Yes
Pages 113 – 131, Policies 46 – 49	<p>The Strategic Sites combined will deliver major population and development growth in the Borough. This in turn will put significant pressure on the infrastructure of the emergency services. This infrastructure is critical to ensuring safe and secure communities and places. Further details are provided by the accompanying response prepared by consultants WYG. The concern of the emergency services is therefore to ensure that development of the scale proposed by Policies 46-49 makes adequate provision for the future emergency service needs that they will generate.</p> <p>In this regard, the Secretary of State and Planning Inspectors have confirmed via recent appeal decisions that developer contributions to such infrastructure is compliant with paragraph 204 of the NPPF and CIL Regulation 122. We are therefore pleased that the</p>	Comments are noted. The Council has considered these representations further in consultation with WMP and HWFRS. It is considered that the minor amendments to Policy 40 (see above) resolve the concerns expressed by WMP and HWFRS in relation to Policies 46-49.	None	Agreed	Yes

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	<p>Infrastructure Delivery Plan (IDP) covers emergency service infrastructure needs and takes account of previous representations in this respect. WMP and HWFRS are therefore surprised and concerned that Policies 46-49 make no reference to the IDP at all. This in turn makes these policies inconsistent with the NPPF and puts at risk the delivery of required emergency services infrastructure in-step with development and population growth.</p>				
<p>Appendix 4: Infrastructure Implications of Local Plan No.4 Policies, Policies 40 and 41 Delivery Partners</p>	<p>Appendix 4 refers to West Midlands Police as delivery partners for Policies 40 and 41. This is incorrect. West Mercia Police is responsible for the delivery of all policing services to the Borough of Redditch.</p>	<p>The references to West Midlands Police are typos.</p>	<p>Amend listed delivery partner to West Mercia Police for Policies 40 and 41.</p>	<p>Agreed</p>	<p>Yes</p>