



Buckinghamshire & Milton Keynes Fire Authority
MAKING YOU SAFER
PREVENTING PROTECTING RESPONDING
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Our Ref: JP
Enquiries to: Julian Parsons
Direct Line: 079644 15055
Date: 27th November 2017
Email: jparsons@bucksfire.gov.uk

Planning Policy
Wycombe District Council
Queen Victoria Road
High Wycombe
HP11 1BB

Dear Sirs

Publication of the Wycombe District Local Plan: Representations and Comments

We have reviewed the Wycombe District Local Plan. Our representations in relation to this are set out below.

Policy DM23 – Other Residential Uses

We are supportive of the policy in general and, in particular, the requirements for:

- at point 3c), sufficient parking to meet the needs of residents – this should also be sufficient to facilitate unobstructed access to all parts of residential developments by fire appliances and other emergency services vehicles and to firefighting infrastructure such as fire hydrants (we have many examples of inadequate parking facilities on new estates leading to parked vehicles obstructing access to premises and hydrants when responding to emergency calls);
- at point 3d), sufficient bin storage - this will reduce the potential availability of materials for fire setting;
- at point 5, communal facilities - we would recommend that in addition to ensuring the adequacy of these, consideration also be given to requiring inclusion of automatic fire suppression systems for Houses in Multiple Occupation as these are at greater risk of and from fire than a typical dwelling in single occupancy.

Policy DM24 – Affordable Housing / DM25 Rural Exceptions Affordable Housing

We are supportive of this policy and, in particular, any measures that will increase the supply of affordable housing in locations where we have fire stations that operate under the 'on-call' or 'day crew' duty systems which require firefighters to live in close proximity to fire stations. We are finding it increasingly difficult to find new staff in many of these locations as rising house and rental prices have placed housing beyond the reach of people in demographic and occupational groups from which we typically recruit.

Policy DM39 – Managing Flood Risk and Sustainable Drainage

We are supportive of this policy but would recommend that where developments are permitted in areas at risk of flooding the requirement for a site specific flood risk assessment at point 5 be augmented to include consultation with the Fire and Rescue Service as to the feasibility of undertaking rescue and recovery operations during and in the aftermath of flooding events. Also, in relation to paragraph 6.187 we would recommend that we be notified of any locations where housing in areas at risk of flooding has been allocated for occupancy by vulnerable groups, such as elderly or disabled people, so that they can be identified for early evacuation or high priority rescue.

Policy DM41 – Optional Technical Standards for Building Regulation Approval

We recommend that a requirement for the installation of automatic fire suppression systems be included for Category 2 (accessible and adaptable) and Category 3 (wheelchair user) dwellings as occupants will face greater risk to life in the event of fire.

Policy PR7 – Development Requirements

We welcome the inclusion of:

- provision for affordable housing and our comments in relation to DM24 and 25 above refer;
- proposals to make cycling and walking safer specified at points 3 and 6.

We do not see a need for us to participate in the oral part of the examination but please feel free to contact me if you require any further information or evidence from us.

Yours faithfully



Julian Parsons
Area Commander – Head of Service Development



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Date: 14th December 2017
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Planning Policy
Aylesbury Vale District Council
The Gateway
Gatehouse Road
AYLESBURY
HP19 8FF

Dear Sirs

Publication of the Vale of Aylesbury Local Plan: Representations and Comments

We have reviewed the Vale of Aylesbury Local Plan. Our representations in relation to this are set out below.

Strategic Objectives

We welcome your commitment, at 2.6-3, to working with partners to secure timely and well-located provision of infrastructure, services and facilities needed to sustain and enhance existing and new communities and the specific inclusion of fire services at point d as part of this. In the main we are of the view that this should largely consist of ensuring adequate provision of fire-fighting infrastructure such as hydrants and access requirements for fire appliances and other emergency services vehicles in the design of new residential and commercial developments. However, we also note, in particular, the significant expansion of Aylesbury to the East and North-West and the designation of Wendover / Halton Camp as a strategic settlement. We will consider and advise of the potential implications of this for fire cover along this axis as we develop our 2020-25 Public Safety Plan together with any potential requirements for new fire station and / or 'standby' facilities for fire crews which may generate the need for land allocations.

Policy H1 – Affordable Housing / H2 Rural Exception Sites

We are supportive of this policy and, in particular, any measures that will increase the supply of affordable housing in locations where we have fire stations that operate under the 'on-call' or 'day crew' duty systems which require firefighters to live in close proximity to fire stations. We are finding it increasingly difficult to find new staff in many of these locations as rising house and rental prices have placed housing beyond the reach of many people in the demographic and occupational groups from which we typically recruit.

Policy H6 – Housing Mix

We recommend that a requirement for the installation of automatic fire suppression systems be included for Category 2 (accessible and adaptable) and Category 3 (wheelchair user) dwellings as occupants will face greater risk to life in the event of fire.

Policy T5 Vehicle Parking

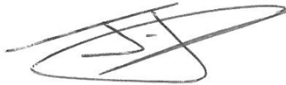
We are supportive of the policy in general and, in particular, design requirements that discourage anti-social parking on streets as we have many examples of inadequate parking facilities on new estates leading to parked vehicles obstructing access to premises and hydrants when responding to emergency calls. We recommend that the policy at T5a, on levels of parking provision, also require that this be sufficient to facilitate unobstructed access to all parts of residential developments by fire appliances and other emergency services vehicles and to firefighting infrastructure such as fire hydrants.

Policy 14 Flooding

We are supportive of this policy - particularly the inclusion of requirements for evacuation management planning in consultation with the emergency services as set out at point I. However, we also recommend that we be notified of any locations where housing in areas at risk of flooding has been allocated for occupancy by vulnerable groups, such as elderly or disabled people, so that they can be identified for early evacuation or high priority rescue.

We do not see a need for us to participate in the oral part of the examination but please feel free to contact me if you require any further information or evidence from us.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Julian Parsons', written over a faint rectangular stamp or grid.

Julian Parsons

Area Commander – Head of Service Development



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Our Ref: JP
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 Email: jparsons@bucksfire.gov.uk

Development Plans
 Growth, Economy & Culture
 Milton Keynes Council
 Civic Offices
 1 Saxon Gate East
 Central Milton Keynes
 MK9 3EJ

Dear Sirs

Milton Keynes Council Proposed Submission Plan: Representations and Comments

We have reviewed the Milton Keynes Proposed Submission Plan (October 2017). Our representations in relation to this are set out below.

9 EDUCATION AND HEALTH

We note the inclusion, at 9.2, of fire services as part of the increased levels of provision of necessary facilities and services that will be essential to support growth and development. In the main we are of the view that this should largely consist of ensuring adequate provision of fire-fighting infrastructure such as hydrants and access requirements for fire appliances and other emergency services vehicles in the design of new residential and commercial developments. However, we will also consider and advise of any potential implications from the projected growth in the borough for the strategic distribution of fire cover as we develop our next Public Safety Plan, which will cover the period 2020 – 2025. This will include any potential requirements for changes to fire station locations and / or creation of ‘standby’ facilities for fire crews which may generate the need for land allocations.

POLICIES SD6 EASTERN EXPANSION AREA / SD7 WESTERN EXPANSION AREA / SD8 STRATEGIC LAND ALLOCATION / SD9 NEWTON LEYS / SD14 MILTON KEYNES EAST / HN2 AFFORDABLE HOUSING / HN10 RURAL EXCEPTION SITES

We welcome measures that will increase the supply of affordable housing as we are finding it increasingly difficult to find new staff in locations where rising house and rental prices have placed housing beyond the reach of many people in the demographic and occupational groups from which we typically recruit. This is particularly acute in locations where fire cover is operated via ‘on-call’ and ‘day crew’ crewing systems which require staff to live in close proximity to fire stations.

POLICY HN4 AMENITY, ACCESSIBILITY AND ADAPTABILITY OF HOMES

We recommend that a requirement for the installation of automatic fire suppression systems be included for Category M4 (3) wheelchair accessible dwellings as occupants will face greater risk to life in the event of fire.

Head of Service Development
 Buckinghamshire and Milton Keynes Fire & Rescue Service
 Stocklake, Aylesbury, Bucks HP20 1BD -Tel: 01296 744400/07964415055

POLICIES CT2 MOVEMENT AND ACCESS / CT5 PUBLIC TRANSPORT / CT10 PARKING PROVISION / D4 AMENITY AND STREET SCENE / CC2 LOCATION OF COMMUNITY FACILITIES

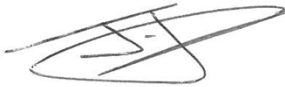
We are supportive of these policies and, in particular, design requirements that discourage obstructive parking on streets as inadequate parking facilities on new developments can lead to parked vehicles obstructing access to premises and hydrants when responding to emergency calls. We recommend that the policies at CT10 iii and D4f, relating to parking area design, also require that this be sufficient to facilitate unobstructed access to all parts of residential developments by fire appliances and other emergency services vehicles and to firefighting infrastructure such as fire hydrants.

POLICY FR1 MANAGING FLOOD RISK

We are supportive of this policy but would recommend that where developments are permitted in areas at risk of flooding the requirement for a site specific flood risk assessment be augmented to include consultation with the Fire and Rescue Service as to the feasibility of undertaking rescue and recovery operations during and in the aftermath of flooding events. Also we would recommend that we be notified of any locations where housing in areas at risk of flooding has been allocated for occupancy by vulnerable groups, such as elderly or disabled people, so that they can be identified for early evacuation or high priority rescue.

We do not see a need for us to participate in the oral part of the examination but please feel free to contact me if you require any further information or evidence from us.

Yours faithfully



Julian Parsons
Area Commander – Head of Service Development



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Our Ref: JP
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Email: jparsons@bucksfire.gov.uk

Helen Harding
Principal Planner (Planning Policy)
Chiltern and South Bucks District Councils
King George V House
King George V Road
Amersham
HP6 5AW.

Dear Ms Harding

Consultation on the Draft Infrastructure Delivery Schedule v 1.2 Chiltern and South Bucks Local Plan

Thank you for your email of 4 December inviting us for feedback on the above. Our comments are as follows:

CDC & SBDC Settlement Options Map / Green Belt Options Appraisal

We note the potential development scenarios for the Emerging Local Plan and are of the view that these are unlikely to affect the strategic distribution of fire cover. However, we will be undertaking a review of fire cover across the two Districts as part of the preparatory work for our next Public Safety Plan which will cover the period 2020-2025. As this work progresses we will advise if any potential implications for our fire station 'footprint', or requirements for other facilities such as 'standby points', emerge.

We also note the outline proposals for provision of affordable housing in a number of locations. We welcome measures that will increase the supply of affordable housing as we are finding it increasingly difficult to find new staff in locations where rising house and rental prices have placed housing beyond the reach of many people in the demographic and occupational groups from which we typically recruit. This is particularly acute in locations where fire cover is operated via 'on-call' (as at Great Misenden & Chesham fire stations) and 'day crew' (as at Amersham and Gerrards Cross fire stations) crewing systems which require staff to live in close proximity to fire stations.

Draft Infrastructure Delivery Schedule

Paragraph 65 invites provision of further information on infrastructure requirements and policy content in relation to flood management. We recommend that where developments are permitted in areas at risk of flooding, the requirement for a site specific flood risk assessment be augmented to include consultation with the Fire and Rescue Service as to the feasibility of undertaking rescue and recovery operations during and in the aftermath of flooding events. Also we would recommend that we be notified of any locations where housing in areas at risk of flooding has been allocated for occupancy by vulnerable groups, such as elderly or disabled people, so that they can be identified for early evacuation or high priority rescue.

Head of Service Development
Buckinghamshire and Milton Keynes Fire & Rescue Service
Stocklake, Aylesbury, Bucks HP20 1BD -Tel: 01296 744400/07964415055

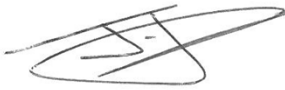
APPENDIX A - LOCAL PLAN CONSULTATION RESPONSES

We also note, at paragraph 79, that no specific infrastructure requirements for emergency services have been identified. However, in addition to any requirements emerging from our fire cover review discussed above, there is also likely to be a requirement for additional fire hydrant provision for new developments of significant size and consideration given to ensuring that street layouts and parking provision are sufficient to facilitate unobstructed access for fire appliances and other emergency services vehicles.

These are very much our initial comments but we look forward to providing further input as your Emerging Local Plan is developed. In the meantime, please feel free to contact me if you would like to discuss any of the above points.

With kind regards.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Julian Parsons', written over a faint, illegible printed name.

Julian Parsons
Area Commander – Head of Service Development