

MEMORANDUM



From: Rebecca Pomeroy
Interim Public Protection Service
Manager

To: Matthew Phillips
Planning Control Lead/Manager

Our Ref:

Your Ref: P/2022/0725

Date: 31/08/2022

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

Re: P/2022/0725 Kop Development for 5,500 spectator seats, inclusive of a 500 capacity hospitality area, with a 600 capacity non-match day exhibition space, new public realm and associated works. The Racecourse, Mold Road, Wrexham, LL11 2AH

I write in response to the Planning consultation in respect of the above application.

The Public Protection Service (as Safety at Sports Grounds Regulator and therefore a relevant consultee to this process) submits the following public safety representations with a view to them becoming Conditions to the Planning Approval/Permission document, or Advisory Notes to the applicant therein, as appropriate.

Definitions and references

Sports Grounds Safety Authority – Guide to Safety at Sports Grounds (The Green Guide) Sixth Edition [**GG6**].

***Zone Ex** (the External Zone) and sometimes referred to as the 'Last Mile'. It lies immediately beyond the outer perimeter of the sports ground, consisting of a network of routes and areas, often leading to car parks and transport hubs, and whose management is considered key to the safe and secure arrival and departure of spectators. The routes or areas that make up Zone Ex do not, in most locations, fall within the jurisdiction of the ground management – they will either be part of the public realm or under private ownership.

Proposed Planning Conditions

CAPACITY

The maximum capacity for the completed Kop End Stand shall not exceed 5,500 spectators. For the avoidance of any doubt, this shall also apply to non-football related events.

Reason: Public Safety

The application has been assessed based on this capacity as this was the figure submitted in the planning application and the Local Planning Authority would need to consider the acceptability of any proposed increase. (N.B. A maximum stand capacity, which may be less than the proposed capacity, will ultimately be set by the Public Protection Service, as Sports Grounds Safety Regulator via the General Safety Certificate, certification process).

SECURITY OF INFRASTRUCTURE & SECURITY STRATEGY/REPORT

Details of any proposed Hostile Vehicle Management (HVM) mitigation measures are to be designed in dialogue with Police Counter Terrorism Security Advisors (CTSA), with North Wales Police, North Wales Fire Service and the Public Protection Service Manager at Wrexham County Borough Council to be provided with details of any such proposals.

A Security Strategy/Report shall be prepared and submitted to the Council to support the application.

Reason: Public Safety & Security, Prevention of Crime

MOTOR VEHICLE MOVEMENT RESTRICTIONS - CROWD SAFETY/SECURITY

No motor vehicles/motor bikes, except those under the direction of the emergency services, shall be permitted to access or egress any Hostile Vehicle Mitigation Zone area or any Motor Vehicle Movement Restriction Zone area as defined in the **SECURITY STRATEGY/REPORT** during relevant defined timeframes.

Reason: Public Safety & Security

PUBLIC REALM MANAGEMENT PLAN

Prior to first public access of the development site, a Public Realm Management Plan shall be submitted for approval in writing to the Local Planning Authority. The management plan shall set out arrangements for managing public access to external public realm areas.

Reason: In the interests of public amenity, public safety & security.

Advisory Notes to Applicant

CROWD MODELLING

Public safety is an important consideration within planning and regulatory frameworks and should be promoted in new developments with appropriate and proportionate steps taken to reduce vulnerability, increase resilience and ensure public safety and security.

With reference to ***GG6** - suitable Crowd Simulation Modelling (CSM) should be undertaken to inform the proposed development, anticipated flow rates and proposed capacity, with the aim of ensuring and demonstrating that safe access and egress to and from the stadium buildings can be achieved, in accordance with relevant guidance, including GG6.

CSM (also known as dynamic modelling) should be used to inform the design and management of circulation routes both inside the sports ground and within **Zone Ex*.

Crowd modelling should be used to inform the minimum width, location and number of proposed openings required to enable safe and timely access and egress from the new Kop Stand and the rest of the stadium based on the stadium being used at full capacity.

CSM offers a useful evaluation of movement patterns and can help to identify any issues that might affect the calculation of the exit capacity.

Such crowd modelling should include consideration of the various proposed development scenarios and associated infrastructure implications in *Zone Ex*. It should be emphasised that factors within *Zone Ex* can have a considerable impact upon the circulation of people outside the ground, during both ingress and egress, and potentially upon the safety of people inside the ground.

The objective is to identify and consider (pre-build) whether any issues within *Zone Ex* may give rise to safety concerns (which could adversely impact upon the safe ingress or egress of spectators). If no such concerns are identified then the exercise/study should serve to help demonstrate that spectators could be safely moved away from the stadium, onto the public highway network.

Such crowd simulations should be carried out by competent modellers, with the resulting data subject to detailed analysis by competent persons, with copies of any CSM Reports submitted to the Council.

Reason: Public Safety

FIRE SAFETY

Fire Safety Planning

As per the 'Green Guide' Sixth edition [***GG6**] (Guide to Safety at Sports Grounds published by the Sports Grounds Safety Authority) - Section 15.5, as part of the design process the designer should draw up a **fire strategy** for the proposed Kop End Stand.

The design of all new stands or structures, plus that of all alterations to any existing stands or structures, must also take into account the overall fire safety arrangements in the sports ground.

Management must ensure that before any new or refurbished structure is brought into use for an event, the responsible person carries out a fire risk assessment for that structure.

Fire Safety Strategy

Designers of new stands at sports grounds, or of major alterations at existing grounds, should commission a fire safety strategy, to focus on the following issues:

- a. Emergency exit routes
- b. Fire detection and warning systems
- c. The fire rating of walls, doors, floors and structures
- d. The potential for external fire spread
- e. Fire service access
- f. Details of any fire engineering used, such as smoke modelling, structural fire engineering or evacuation modelling

The fire strategy should include a description of the assumptions and philosophies that led to the fire safety design, including those assumptions regarding the future management and maintenance of the building. Upon completion of the structural work, the fire strategy will come under the jurisdiction of the person responsible for fire safety at the sports ground.

It is requested that a Fire Strategy be submitted to the Council at the earliest opportunity, and certainly before or at the time of the Building Control application.

Once a fire strategy is in place, it should form the basis for the Fire Safety Plan.

Where construction takes place while other parts of the ground or building(s) remain in use, the fire strategy should outline how standards of fire safety are to be maintained throughout all stages of the construction.

The fire safety strategy should be subject to periodic audit (at least annually or more frequently as determined by risk assessment).

Access for fire appliances: should comply with the requirements of Approved Document B5 of the Building Regulations, GG6 and the General Safety Certificate.

Reason: Public safety

WATER SUPPLIES FOR FIREFIGHTING PURPOSES: should be risk assessed in accordance with the relevant guidance, in liaison with the water undertakers, with suitable and sufficient fire hydrants supplied/provided.

Reason: Public safety and to ensure suitable access and water supply for emergency services.

RAIL SEATING

Supplementary Guidance 01: Safe standing in seated areas September 2021 (SGSA: SG01) shall be referred to in the design and compliance expectations of spectator accommodation incorporating any rail seating, in addition to the relevant guidance in GG6.

Reason: Public safety

LIGHTING

Appropriate lighting should be used to ensure there is sufficient light levels internally and externally, in the interests of public safety and to assist both natural and remote surveillance.

Reason: Public Safety, Prevention & Detection of Crime/Anti-Social Behaviour

A handwritten signature in black ink that reads "J.P. Osborne". The signature is written in a cursive, slightly slanted style.

Paul Osborne
Public Protection Officer

p.p.

Public Protection Service Manager