

# Enclosure 1: Solihull Local Plan Review letter of representation dated 14<sup>th</sup> of December 2016



Planning and Architecture | advice | applications | drawings

Policy and Spatial Planning  
Solihull MBC  
Council House  
Manor Square  
Solihull  
B91 9QB

Our Reference: 8980 LPA HRW

Emailed only: [psp@solihull.gov.uk](mailto:psp@solihull.gov.uk)

14<sup>th</sup> December 2016

Dear Sir/Madam

## **Solihull Local Plan Review: Formal Representations on behalf of West Midlands Police Chief Constable.**

We act for the Chief Constable of the West Midlands Police and are instructed to make representations on local development documents in respect of securing policy reference in such documents to matters including:

- Recognising the community need for securing safe environments with crime reduction made a priority;
- Requiring developers to demonstrate how proposals address community safety and crime prevention in Design & Access Statements, or other relevant planning application documents;
- Promoting a safe and secure entertainment, leisure and evening economy;
- Ensuring the timely and effective engagement of the police and other emergency services to ensure effective delivery of infrastructure projects required as a result of development growth with the recognition that the police are a social infrastructure delivery agency;
- In appropriate cases, seeking financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of development proposals and growth;
- Ensuring the timely and effective engagement of the police and other



T: 0121744 5511 A: 55 Stratford Road, Shirley, Solihull, B90 3LP W: [www.tyler-parkes.co.uk](http://www.tyler-parkes.co.uk) E: [info@tyler-parkes.co.uk](mailto:info@tyler-parkes.co.uk)  
The Tyler-Parkes Partnership Ltd is a registered company in England and Wales: 4102717



emergency services in the planning processes in relation to matters likely to affect crime and fear of crime; and

- Ensuring the timely and effective engagement of the police and other emergency services in relation to Counter-Terrorism matters. For example, Counter Terrorism Security Advisors can give appropriate advice concerning Vehicle-Borne Devices (VBD) mitigation and the Crowded Place agenda (particularly in relation to shopping areas and the night-time economy).

Section 17 of the Crime and Disorder Act 1998 states, 'Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area'.

The Chief Constable clearly has a statutory duty to secure the maintenance of an efficient and effective police force for its area and, of course, the Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime.

The Chief Constable is grateful for the opportunity to comment on the Draft Solihull Local Plan Review. He welcomes the changes proposed to the wording of Policies P2, P15 and P18 as follows, with the useful additions in 'bold':

Policy P2 – Maintaining Strong, Competitive Town Centres

'...to create well designed streets with attractive active frontages which encourage vibrant and active street life and create characterful and well defined spaces and routes...The value of good urban design...the importance of creating legible, distinctive, flexible, attractive, **safe and inclusive public realm** throughout the town centre...'

Policy P15 Securing Design Quality

'...Creates attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, inter-connected and easily maintained, and encourages walking and cycling and reduces crime and the fear of crime **through the adoption of Secured by Design principles in all developments...**'

Policy P18 Health and Well Being

'...New development proposals will be expected to promote, support and enhance physical and mental health and wellbeing. Healthy lifestyles will be enabled by...**Supporting safe and inclusive design that discourages crime and anti-social behaviour, and encourage social cohesion...**'

However, the Chief Constable is disappointed that there is no mention of the need to consider the impact on emergency service infrastructure arising from



development on the proposed housing and employment sites. The appendix lists the allocated sites in the Draft Local Plan Review and sets out the likely infrastructure requirements, including highway, public transport, health, open space and education improvements. Unfortunately the list does not mention any need for increased Police infrastructure provision, yet the scale of development proposed will inevitably have implications for the maintenance of safety and security and there is likely to be a need for additional Police infrastructure. The Chief Constable formally requests that wording similar to that included in the adopted Solihull Local Plan, 2013, be included in the table of allocated sites in the Local Plan Review. The wording for each of the allocated sites would read as follows: '...Consider impact on social infrastructure provision, eg. Emergency services and community facilities.'

The Chief Constable is also disappointed that reference to the West Midlands Police has been removed from the supporting text for Policy P21 'Developer Contributions and Infrastructure.' The supporting text for Policy P21 in the adopted Local Plan, 2013, includes, at paragraph 13.3.3 'We are working with statutory delivery agencies to have the most up-to-date information on infrastructure requirements and to strive for multiple benefits from development where possible. Examples are...the West Midlands Police to deliver safe developments and communities.' The proposed supporting text in the Draft Local Plan Review does not include the Police within the list of those bodies the Council will be working in partnership with. Whilst it is accepted partnership working is 'not limited' to those listed, the Chief Constable formally requests that reference continues to be made to the West Midlands Police in the supporting text for Policy P21, similar to the wording in the adopted Local Plan.

The local police Senior Leadership Team and Local Policing Unit are likely to have detailed knowledge about site specific issues in respect of crime and safety and any needs arising from the proposed additional residential and employment land allocations. Additionally, the centrally-based Crime Prevention Design Advisor team (CPDAs) have extensive knowledge of security measures and 'Designing Out Crime'. The Chief Constable requests that the Senior Leadership Team, Local Policing Unit and CPDAs are engaged in the preparation of the Concept Masterplans for the proposed land allocations and also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

The Chief Constable and his representatives would be pleased to meet with you to discuss the matters raised in this letter of representation.

We should be grateful if you would acknowledge receipt of this letter of representation.

Yours faithfully,

Helen R Winkler Bsc(Hons) DipTP MRTPI  
Senior Planning Consultant  
[REDACTED]