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15th March 2019

Dear Sir/Madam

Solihull Local Plan Review: Draft Local Plan Supplementary Consultation: Formal Representations on behalf of Chief Constable of West Midlands Police

We act for the Chief Constable of the West Midlands Police (CCWMP) 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 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 in the planning process in relation to matters likely to affect crime and fear of crime; and

- Ensuring the timely and effective engagement of the police 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 CCWMP 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 CCWMP is grateful for the opportunity to comment on the Draft Supplementary Consultation as part of the Solihull Local Plan Review. The comments set out in this letter of representation are in addition to the matters raised in our earlier letter dated the 14th of December 2016 (Enclosure 1) concerning the Draft Solihull Local Plan Review and Policies P2, P15, P18 in respect of which the CCWMP proposed changes, which remain pertinent to the plan making process.

Purpose of the Supplementary Consultation and Summary of CCWMP Comments:

Paragraph 4 (bullet point 6) of the Draft Local Plan Supplementary Consultation states that it seeks views inter alia, on the existing pressures and future requirements for infrastructure provision. In addition, paragraph 422 of the Supplementary Consultation invites any other comments that are considered relevant.

In terms of the Schedule of Questions, paragraphs 3, 11, 16, 19, 22, 25, 29, 31 invite comments on whether the infrastructure requirements identified in specific settlements within the Supplementary Consultation document are adequate or whether other matters should be added.

Question 44 of the Schedule of Questions relates to any other comments on the Draft Local Plan Supplementary Consultation.

In summary, this representation concludes that: -

- The CCWMP has a statutory duty to secure the maintenance of an efficient and effective Police force for its area, and the Council has a statutory requirement to consider crime, disorder and community safety in the exercise of its planning functions. Planning policies therefore require the theme of community safety and crime prevention be given prominence in the Solihull Local Plan Review, which is vital in the context of creating sustainable communities.

- In order to sustain the level of growth proposed in the Local Plan Review and to meet national and local policy objectives relating to safety and security, contributions will be required through CIL/ S.106 agreements to help fund the provision and maintenance of Police services. This representation includes general observations on the existing pressures and future requirements for Police infrastructure provision;

- Recorded crime in the Borough has increased by 20% since 2016 and this trend is likely to continue. However, the Joint Strategic Needs Assessment, whilst providing an overview of the threats and opportunities arising from the scale of development proposed, fails to prioritise all areas of crime adequately and is narrow in scope: to that extent is not proportionate in the context of the evidence base underpinning the Local plan Review.

- In terms of the proposed allocations, there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed growth to ensure that safety and security can be maintained across the Borough. This is particularly the case in terms of the major growth aspirations at the Hub.

- The Police should be actively engaged on an on-going basis in the future reviews of the IDP to ensure that the evolving needs of policing are kept up-to-date and are taken into consideration; and

- The Police Design Out Crime Team, Senior Leadership Team and Local Policing Unit are effectively engaged in the planning and design process in relation to matters likely to affect crime and the fear of crime, in the preparation of masterplans and policy implementation.

These representations on behalf of the CCWMP are directed at the above points and are considered on the basis of:

a) General observations on the existing pressures and future requirements for Police infrastructure provision;

b) The Joint Strategic Needs Assessment January 2019 as part of the evidence base supporting the Local Plan Review;

c) Responses to development proposed in specific settlements and questions 3, 11, 16, 19, 22, 25, 29 and 31; and

d) Response to question 44 – other comments on the Draft Local Plan Supplementary Consultation.

a) General observations on the existing pressures and future requirements for Police infrastructure provision

Planning Policy Background

National Planning Policy Framework, February 2019

1. The National Planning Policy Framework (NPPF), February 2019, paragraph 2 states that the NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

2. Paragraph 7 explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 identifies three overarching objectives for the planning system: an economic, social and an environmental objective. These objectives include identifying and coordinating the provision of infrastructure and fostering a well-designed and safe built environment to support inter alia communities' social well-being. Paragraph 9 states that these objectives should be delivered through the preparation and implementation of plans.

3. Paragraph 16 of the NPPF confirms that Plans should be prepared with the objective of achieving sustainable development and should be shaped by effective engagement between plan-makers and local organisations and statutory consultees.

4. Paragraph 20 (b) states that Strategic policies should set out an overall strategy for the

pattern and scale of development and make sufficient provision for infrastructure for security.

5. Paragraph 28 of the NPPF deals with non-strategic policies and states that these should set out more detailed policies for the provision of infrastructure at a local level.

6. In Chapter 3 'Plan Making', at paragraph 31, the NPPF provides that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, justifying the policies concerned.

7. As far as development contributions are concerned, paragraph 34 of the NPPF provides that plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure. Such policies should not undermine the deliverability of the plan.

8. Paragraph 35(b) of the NPPF states that Local Plans are examined to assess whether they are 'sound', which necessitates an evaluation to determine whether they have been positively prepared, justified, effective and consistent with national policy. In terms of whether a plan is justified, they should be based on proportionate evidence.

9. Chapter 8 'Promoting healthy and safe communities' identifies at paragraph 91 that planning policies and decisions should aim to achieve healthy, inclusive and safe places, which are safe and accessible, so that crime and disorder and the fear of crime do not undermine the quality of life or community cohesion.

10. Paragraph 95 states that planning policies and decisions should promote public safety and take into account the wider security and defence requirements. This should be achieved by:

    a) Anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for the relevant areas (such as town centre and regeneration frameworks) and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and

    b) Recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

11. Paragraph 127 states that planning policies and decisions should ensure that

developments, amongst other requirements, create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder and the fear of crime do not undermine the quality of life or community cohesion and resilience.

Planning Practice Guidance

12. The national 'Planning practice Guidance' (PPG), paragraph 10 (Reference ID: 26-010-20140306 Revision date: 06 03 2014) is sub-titled 'Planning should address crime prevention'. It states that designing out crime and designing in community should be central to the planning and delivery of new development. It emphasises that it is important that crime reduction-based planning measures are based upon a clear understanding of the local situation and consideration needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities. The guidance states that this means working closely with police forces to analyse and share relevant information and good practice.

13. Paragraph 008 Reference ID: 26-008-20140306 of the PPG confirms that planning should promote safe, connected and efficient streets. Planning policies and decisions should look to create streets that support the character and use of the area. Development proposals should promote accessibility and safe local routes by making places that connect appropriately and are easy to move through. For this reason, streets should be designed to be functional and accessible for all and to be safe, attractive public spaces. Streets should be designed to support safe behaviour.

14. The PPG also states (Paragraph: 011 reference ID: 26-011-20140306) that planning should promote appropriate security measures, confirming that they should be central to planning and the delivery of new developments and substantive retrofits. The objective is to create safer places that are less vulnerable to attack and should an attack take place, where people are better protected from its impact.

15. In terms of Plan making, Paragraph 035 reference ID: 61-035-20180913 provides that in gathering evidence to plan for defence, national security, counter-terrorism and resilience, strategic policy-making authorities should, where appropriate:

    - Work with the Police and other security agencies to develop and implement a local strategy to guide proposals for appropriate security measures at public buildings and spaces;
    - Work with local Police Counter-Terrorism Security Advisors, Crime Prevention Design Advisors, Designing Out Crime Officers and Architectural Liaison Officers where appropriate to ensure that they inform them of planning applications concerning the development of crowded places,

transport hubs and critical infrastructure;

- Involve Police and appropriate design advisers in the preparation of site allocations in emerging plans.

16. Paragraph: 003 Reference ID: 003 20150326 of the PPG relates to planning obligations and provides that policies for seeking planning obligations should be set out in a local plan to enable fair and open testing of the policy at examination. Supplementary Planning Documents should not be used to add unnecessarily to the financial burden on development and should not be used to set rates or charges which have not been established through development plan policy. It confirms that planning obligations assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure. Local communities should be involved in the setting of planning obligations policies in the local plan.

17. In terms of the Community Infrastructure Levy (CIL) Paragraph 010 Reference ID: 25-010-20140612 states that charging schedules should be consistent with and support the implementation of up-to-date relevant plans.

18. National Policy also provides that Charging authorities should seek early engagement with infrastructure providers when preparing their charging schedules (Paragraph 014 reference ID: 25-014-20150323).

19. Guidance on viability in plan making and decision taking was updated in the PPG on the 24th of July 2018 in line with the revised NPPF. Paragraph: 002 Reference ID: 10-002-20180724 confirms that the role for viability assessment is primarily at the plan making stage. Viability assessment should be used to ensure that policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders to create realistic, deliverable policies.

Chief Planning Officer letter, July 2017

20. On the 12th July 2017, a letter from the Chief Planning Officer was published by the Department of Communities and Local Government to remind local planning authorities of the important role the planning system plays in ensuring appropriate measures are in place in relation to counter-terrorist and crime prevention security. It encourages, where appropriate, pre-application discussions between planning officers and security advisors, such as Counter Terrorism Security Advisors and Police Crime Prevention Design Advisors, to ensure that authorities and applicants share an understanding right at the beginning of the design process, of the level of risk and the sort of measures available to mitigate the risk in a proportionate and well designed manner. In addition to the need for reference to be made to the requirements in the NPPF and the PPG, the letter also states

that reference should be made to the guidance ‘protecting crowded places: design and technical issues’.

‘Protecting crowded places: design and technical issues’, April 2014

21. ‘Protecting crowded places: design and technical issues’, updated in April 2014, is aimed at everyone involved in the planning, design and development of the built environment to give advice about counter-terrorism protective security design.

Local Plan Policy: Solihull Local Plan, December 2013

22. The Solihull Local Plan (SLP) was adopted in December 2013. One of the challenges identified in the SLP focuses on the significant levels of deprivation in the North Solihull area with high levels of crime and the fear of crime. The SLP also acknowledges the existence of pockets of anti-social behaviour crime around other areas within the Borough.

23. Policy P15 confirms that all development proposals will be expected to achieve good quality, inclusive and sustainable design which inter alia, create attractive, safe places and reduce crime and the fear of crime.

24. Policy P18 promotes health and well being and requires new development to contribute to a safe public realm. As explained in the supporting text to the Policy at paragraph 12.2.9 of the SLP, it is recognised that high quality and well designed buildings and spaces which have safe access, can reduce crime and the fear of crime.

25. Policy 21 of the SLP requires development to provide or contribute towards provision of physical, and social infrastructure to support the needs associated with development. Paragraph 13.2.1 of the SLP accepts that ‘infrastructure’ in this sense is not just roads and pipes, but includes physical and social infrastructure required to enable sustainable development. The supporting text to Policy P21 at paragraph 13.3.3 highlights that in terms of partnership working and infrastructure requirements, the Council works with West Midlands Police to deliver safe developments and communities. In terms of funding sources, it is recognised in the SLP at paragraph 13.8.1 that new development will be expected to meet its own infrastructure needs including social infrastructure (which the CCWMPA considers should include that associated with policing infrastructure) and that these will be secured through developer contributions. It is submitted that this should include that associated with policing.

26. Through the review of the Local Plan, Solihull Council seeks to deliver a significant level of development during the plan period. We have previously made representations on behalf of the CCWMP (letter dated 14th of December 2016 attached as Enclosure 1) in respect of Policies P2, P15, P18 and P21, referring specifically to the fact that the need for additional Police infrastructure is not mentioned in the plan, nor is the need for partnership working with West Midlands Police and sought for this to be addressed.

27. The need for the inclusion of an express reference to these issues is highlighted by the fact that the Supplementary Consultation accepts (at paragraph 55, fourth bullet point) that there will be significant additional growth during the plan period, for example at the UK Central Hub Area (2,500 residential units in addition to significant employment and commercial growth).

28. A primary issue for the CCWMP is to ensure that new development makes adequate provision for the future policing needs that it will generate.

29. The CCWMP considers that it is essential that the need to consider the impact of development on emergency infrastructure arising from the proposed housing and employment sites is expressly mentioned in the policies and supporting text of the Draft Local Plan. The scale of the 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. In this context, a specific reference to partnership working with the West Midlands Police should be made in the supporting text to Policy P21 (as indicated in our previous letter). It is important to ensure that developers are aware of the importance attached to issues of crime and safety by Solihull Council and the need to maintain an appropriate level of community infrastructure and Emergency Services infrastructure.

30. The NPPF confirms that sustainable development includes securing a safe environment through the delivery of social infrastructure needed by communities. Paragraph 20 (b), specifically states policies should deliver development that makes sufficient provision for security infrastructure.

31. Paragraphs 7, 16, 28, 31, 91, 95 and 127 of the NPPF collectively envisage this being delivered through joint working by all parties concerned with new developments.

32. Crime and community safety are planning considerations as the adopted SLP accepts. The NPPF identifies the need to achieve security in new development and community health and cohesion and makes provision to ensure that this is delivered through the planning system. Adequate policing is fundamental to the concept of sustainable communities.

33. The Secretary of State has accepted the need to support Police infrastructure through S.106 contributions in the context of S.78 appeals (see decisions relating to Land at Ashlawn Road West, Rugby– APP/E3715/W/16/3147448 paragraph 30, accepting the Inspector's conclusions at paragraphs 157 and 166 of his report; and land south of Gallows Hill/ west of Europa Way, Heathcote, Warwick- APP/T3725/A/2229398 paragraph 33, accepting the Inspector's conclusions at paragraphs 464 of his report – attached as Enclosure 2).

34. In order to meet the national policy objectives of ensuring safety, reducing crime and the fear of crime, it is vital that the Police are not under-resourced or deprived of legitimate sources of funding.

35. If additional infrastructure is not provided, the level of growth envisaged in the SLP Review will seriously impact on the ability of the Police to provide a safe and appropriate level of service and to respond to the needs of the local community. That outcome would be contrary to policy.

36. With significant levels of development growth, the demands placed on the police service increases. This is exacerbated by the major changes in the nature of crime and its consequent demands, particularly regarding cybercrime, child sex exploitation and terrorism.

37. As increases in local population and the number of households do not lead directly to an increase in funding from central government or local taxation, it is necessary to secure S.106 contributions/ CIL funding for infrastructure due to the direct link between the demand for policing services and changes in the physical environment due to housing and economic growth, which have permanent impacts on policing.

38. Securing modest contributions towards policing enables the same level of service to be provided to residents of new developments, without compromising frontline services. The consequence of no additional funding is that existing infrastructure will eventually become stretched to breaking point, putting policing under threat.

39. It is obvious that the considerable levels of growth anticipated in the SLP Review will place additional and increased burdens on local services, including Police services. Future residents and/or the workforce in these areas will need to live/work in a safe environment and will need to be reassured that the Police can operate efficiently and effectively in the area.

40. To ensure that existing levels of service can be maintained as the growth takes place, developer contributions through the mechanism of S.106 obligations or CIL for Police infrastructure identified by the Police, will be essential.

41. In the light of the above, the CCWMP contends that the Draft Solihull Review Local Plan should make express reference to the need to mitigate the direct and additional policing impacts that the anticipated levels of growth during the plan period will generate.

42. The Council's Infrastructure Delivery Plan (IDP) 2012, will of course need to be reviewed in the light of the scale of development proposed in the Draft Local Plan Review. The current IDP accepts that emergency services are part of the social infrastructure required to enable sustainable development. As a key component of the evidence base to support the Local Plan, it is important that the infrastructure requirements of the Police, arising from the scale of growth, are properly captured in the next iteration of the IDP.

43. In terms of viability, the recent changes to national planning policy give greater emphasis to this issue at the plan-making stage. The Council must take account of the fact that the scale of development proposed will have additional impacts in terms of Police resources and costs which are above and beyond current levels. This is a matter that should be considered in the context of viability assessments.

44. The local police Senior Leadership Team and Local Policing Unit 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 Design Out Crime Team (DOCT) have extensive knowledge of security measures and 'Designing Out Crime'. The CCWMP requests that Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of the Concept Masterplans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

b) The Joint Strategic Needs Assessment - January 2019

45. The Joint Strategic Needs Assessment (JSNA) provides key information regarding the health and wellbeing of the population in Solihull and forms part of the evidence base supporting the SLP Review. The JSNA Summary highlights the key challenges facing the Borough. It underpins the Solihull Health and Wellbeing Strategy 2016-2019, which focuses on the key priorities for the area and the actions being taken to meet Solihull's health and wellbeing needs.

46. In the section 'Safer Communities', fear of crime and reported crime are identified as indicators of the perception of safety by residents in the Borough.

47. On page 89 of the JSNA, reference is made to the 'Safer Solihull Strategic Assessment' 2018, produced by the Police and partner agencies (as part of the Community Safety Partnership responsible for producing the Community Safety Plan 2018-2021). The Safer

Solihull Strategic Assessment 2018 shows that there were 15,006 reported crimes in Solihull in the twelve months between October 2016-September 2017. This equates to a rate of 70.95 per 1,000 population compared to an average of 64.9 across similar police force areas.

48. The number of reported crimes in Solihull increased in the twelve months to September 2017 compared with the same period in 2015/16. This increase in reported crime can be seen across the whole of the West Midlands force and is part of a trend of rising recorded crime, evident since 2012/13. Recorded crime and anti-social behaviour are all highest in North Solihull.

49. Recorded crime increased by a similar amount in each locality area (North Solihull, West Solihull and East Solihull) in September 2017, although there were reductions in the number of anti-social behaviour incidents in North Solihull (-21%) and West Solihull (-7%).

50. The Safer Solihull Strategic Assessment 2018 highlights crime and disorder issues in Solihull and identifies 10 potential key themes with 32 underlying focus areas, which form part of the 'Safer Solihull Community Safety Plan' 2018-21. The priorities within these are:

    - Better protecting people from harm
    - Bringing offenders to justice and tackle reoffending
    - Supporting stronger communities
    - Making our neighbourhoods safer places.

51. The Safer Solihull Strategic Assessment 2018 also highlights safety issues that can be predicted to occur within the Borough and its key findings include:

    - Total recorded crime has seen a 20% increase compared to the previous period captured in the 2016 Partnership Strategic Assessment (October 2015-September 2016). Based on the past 3 years of data, trajectories indicate that this trend is likely to increase at a steady rate, with the 5 year trajectory forecasting that crime will level off. Large increases have been seen in theft of motor vehicles, whilst notable decreases have been seen in drug offences. Vehicle crime accounted for over a fifth of all offences.
    - Anti-social behaviour increased, as did public safety and welfare incidents; overall demand from these incidents increased by around 4%.
    - Chelmsley Wood, St Alphege and Kingshurst and Fordbridge (police neighbourhoods) were disproportionately affected by crime with 1.5 times above the average crime per ward in Solihull.
    - A Counter Terrorism review carried out for Community Safety Partnerships in the West Midlands states that the current threat level is severe, but there is no

known specific threat to Solihull at this time.

52. The Solihull Strategic Assessment 2018 indicates that compared to Solihull's Most Similar Groups (out of 15), the Borough had the worst rates for robbery (person), vehicle crime and theft. Solihull's sexual offences rate was lower than all other Most Similar Group Areas. Reported incidents of anti-social behaviour have decreased compared to the previous year, however public safety and welfare incidents have increased.

53. Figure 7 (page 9) of the Solihull Strategic Assessment 2018 deals with 'Crime Proportionality' in Solihull and summarises the break-down of 'Total recorded Crime' for the last year. It demonstrates that theft and handling offences have consistently been the highest contributor to overall crime over the last few years with its contribution remaining steady over the last three years (at around 44%). Burglary offences have risen year on year over the last three years. Violence has remained stable as a proportion of total crime. Domestic Abuse offences accounted for 7.8% of all crime. Hate Crime and Vulnerable Adult Referrals both accounted for less than 1% of all crime.

54. Figure 25 of the 2018 Assessment (page 22) shows that recorded violent crime in Solihull is forecasted to increase over the next year.

55. The 2018 Assessment also provides a brief overview of the development opportunities and threats that they may pose (pages 35-39). As an illustration, in terms of threats, the Assessment identifies the following:

    - HS2 – As with many developments that increase the foot-flow of the public, there will be an increase in crimes, in particular theft. During construction stages, there will be the target of tools from vehicles and metal theft. Once HS2 is completed, there is elevated risk for criminal damage and theft from person.
    - Housing Strategies – With the need for new housing, comes the need for construction sites. They often involve multiple levels of subcontracting which creates a loss of visibility, creating an environment in which modern-day slavery and exploitation can thrive. Construction sites are also a hotspot for crimes such as theft from motor vehicles (i.e. tools) and metal theft. Once the housing is completed, there is the potential for increase in crimes and incidents that are commonly seen in neighbourhoods such as burglaries, anti-social behaviour and vehicle crime.

56. Notwithstanding the detailed information available in the documents referred to above, in particular the Safer Solihull Strategic Assessment 2018, the JSNA is limited in its scope in relation to safer communities and does not set out an accurate picture in terms of the levels or types of crime in the Borough and the predicted increase. It is not therefore proportionate evidence in support of the SLP Review as it fails to reflect a reliable picture.

57. The JSNA highlights preventing ‘Domestic Abuse’ as one of the priorities for Solihull without identifying the need to prioritise other areas of crime. In this respect, the CCWMP contends that the JSNA is too narrow in its focus and fails to portray the full, accurate picture of existing and future crime levels. It should reflect the key findings of the Solihull Strategic Assessment 2018 in greater detail by identifying the existing crime statistics and trends in order to better reflect pressures on frontline police services and the opportunities and threats that the proposed housing and economic growth in the Borough represents.

58. In addition, by failing to refer to the consequential impact of the proposed levels of development set out in the SLP Review in terms of necessary Police infrastructure, the JSNA is deficient in material respects and does not comply with paragraph 35 (b) of the NPPF. There is a concern that important strategic growth decisions are being made without due consideration of the factual, detailed background or the future infrastructure implications.

59. The JSNA should cross-refer to other relevant documents in greater detail, in particular to the Safer Solihull Strategic Assessment 2018 in order to give a more accurate overview of the current position relating to patterns of crime in the Borough, trends and the challenges facing frontline policing.

60. On this basis, we strongly recommend on behalf of the CCWMP that as part of the evidence base supporting the SLP Review, the JSNA should be wider in scope and should expressly refer to the key findings of the safer Solihull Strategic Assessment 2018 to portray a more accurate picture of the levels and types of crime prevalent in the Borough: it should also identify that there are challenges arising from the levels of growth anticipated in the SLP Review which will require the provision of additional infrastructure in order to deliver sustainable development consistent with national policy set out in the NPPF.

c) Responses to development proposed in specific settlements and questions 3, 11, 16, 19, 22, 25, 29 and 31

Question 3: Do you agree with the infrastructure requirements identified for Balsall Common, if not why not; or do you believe there are any other matters that should be included?

61. The Draft Solihull Local Plan Supplementary Consultation identifies Balsall Common as playing a major part in accommodating the Borough and wider area needs and acknowledges that it can accommodate a scale of development that is capable of supporting significant infrastructure provision that can help play a part in dealing with existing issues and provide the necessary facilities for future residents.

62. The Supplementary Consultation identifies 6 proposed allocations for housing with a potential capacity of approximately 1,690 dwellings and 69 dwellings on small sites, a total of 1,750.

63. In terms of infrastructure requirements for the future, the Supplementary Consultation refers to Balsall Common By-pass, an enhanced centre, station parking, improved public transport, a new primary school, and possible expansion of the existing secondary school (paragraphs 88-93).

64. Paragraph 94 of the Supplementary Consultation refers to 'Community Infrastructure Levy' and states that the parish councils will be able to take forward significant local projects that the community have identified as local priorities. It will be for a parish council to decide how to spend this local element of CIL receipts.

65. The matters identified in paragraphs 88-93 do not mention any need for increased Police infrastructure provision, yet the scale of development proposed in and around the village will inevitably have implications for the maintenance of safety and security. There is likely to be the need for additional Police infrastructure**.**

66. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

67. **In our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.**

68. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of the Concept Masterplans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan review is adopted.

Question 11: Do you agree with the infrastructure requirements identified for Blythe, if not why not; or do you believe there are any other matters that should be included?

69. The Blythe area comprises the parishes of Dickens Heath, Cheswick Green and Tidbury Green. The Draft Solihull Local Plan Review Supplementary Consultation proposes a significant number of new dwellings (approximately 2,290 on the proposed allocations), in the distinct villages set within this area, particularly in Dickens Heath, Cheswick Green and Blythe Valley Park.

70. Paragraphs 132-139 of the Supplementary Consultation list the infrastructure required in this area for the future, including improved public transport, highway improvements, a new primary school, health provision, sports and recreation areas and open space.

71. Paragraph 142 of the Supplementary Consultation refers to The Community Infrastructure Levy and states that the parish councils will be able to take forward local projects identified as priorities. It will be for the parish councils to decide how to spend this local element of CIL receipts.

72. The matters identified in paragraphs 132-139 do not mention any need for increased Police infrastructure provision, yet the scale of development proposed in and around the villages in the Blythe area will inevitably have implications for the maintenance of safety and security and there is likely to be the need for additional Police infrastructure.

73. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

74. **In our view, there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.**

75. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of the Concept Masterplans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

Question 16: Do you agree with the infrastructure requirements identified for Hampton in Arden, if not why not; or do you believe there are any other matters that should be included?

76. The rural settlements of Hampton-in Arden and Catherine-de Barnes are small villages east of Solihull. The Draft Solihull Local Plan Review Supplementary Consultation proposes to allocate two sites in the settlements with a total capacity of approximately 180 dwellings.

77. The Supplementary Consultation makes no reference to specific infrastructure requirements in the future in relation to the proposed allocations in the two settlements.

78. Notwithstanding the relatively modest scale of growth proposed in this specific area, the cumulative impact of development anticipated across the Borough in the SLP Review Local Plan will impose a burden on Police resources and there will inevitably be implications for the maintenance of safety and security. Accordingly, there is likely to be the need for additional Police infrastructure.

79. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

80. **In our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.**

81. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of concept master plans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

Question 19: Do you agree with the infrastructure requirements identified for Hockley Heath, if not why not; or do you believe that there are any other matters that should be included?

82. Hockley Heath is a small semi-rural settlement formed by ribbon development. The Draft Solihull Local Plan Review Supplementary Consultation proposes to allocate 100 dwellings at one site with the potential for an additional 51 at two smaller sites.

83. The Supplementary Consultation makes no reference to specific infrastructure requirements in the future in relation to the proposed allocation in Hockley Heath.

84. Notwithstanding the relatively modest scale of growth proposed in this specific area, the cumulative impact of development anticipated in the SLP Review Local Plan will impose a burden on Police resources and there will inevitably be implications for the maintenance of safety and security. Accordingly, there is likely to be the need for additional police infrastructure.

85. The absence of positive references within the Local plan to the need to provide police infrastructure undermines the delivery of safe and secure development.

86. **In our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.**

87. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of master plans for the proposed allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

Question 22: Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not; or do you believe there are any other matters that should be included?

88. Knowle, Dorridge and Bentley Heath (KDBH) are essentially three villages which are now physically and functionally linked to form the Borough's largest built up rural settlement.

89. The Draft Solihull Local Plan Review Supplementary Consultation proposes a significant number of new dwellings in the area (approximately 900-950).

90. Paragraph 222 of the Supplementary Consultation states that the development in and around KDBH is not only an opportunity for the settlement to play a major part in accommodating the Borough and wider needs but also to accommodate a scale of development that is capable of supporting infrastructure provision that can provide the necessary facilities for future residents.

91. Paragraphs 223-229 of the Supplementary Consultation list the infrastructure required in this area for the future including improved public transport, parking improvements, highway improvements, new primary school, open space and sports and recreation facilities.

92. Paragraph 232 of the Supplementary Consultation refers to the Community Infrastructure Levy and states that the Council will engage with the local community and agree how best to spend CIL funding.

93. The matters identified in paragraphs 223-229 do not mention any need for increased Police infrastructure despite the fact that the scale of development proposed in and around the three villages will inevitably have implications for the maintenance of safety and security and there is likely to be the need for additional Police infrastructure.

94. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

95. **In our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West midlands Police as a consequence of the proposed development growth.**

96. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of master plans for the proposed land and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted. allocations

Question 25: Do you agree with the infrastructure requirements identified for Solihull and the Mature Suburbs, if not why not; or do you believe that there are any other matters that should be included?

97. Solihull Town Centre is a strong, vibrant and regionally important Centre containing shops, businesses and civic services. The 'mature suburbs' consist of urban areas including the largely residential suburbs of Elmdon, Hillfield, Lyndon, Monkspath, Olton, Shirley and Solihull.

98. The Draft Solihull Local Plan Review Supplementary Consultation proposes a significant number of new dwellings within the area (approximately 900, including an urban extension to the east of Solihull) in addition to potential opportunity sites within the Town Centre which are as yet unspecified both in terms of location and quantum.

99. Paragraph 274 of the Supplementary Consultation refers to the fact that the Draft Town Centre Master Plan 2016 will be updated through a refreshed master plan which is not currently available, and which will set out the opportunity sites to reflect changes since the original was prepared.

100. What is clear however, from paragraph 255 of the Supplementary Consultation, is that a significant scale of residential development is anticipated in the Town Centre, with the re-use of land allocated for business/retail purposes elsewhere within this area

101. In terms of what infrastructure is required for the future, the Supplementary Consultation highlights the constraints and challenges that apply to this area. Reference is made to Concept Master Plans at paragraph 261.

102. Paragraph 266 of the Supplementary Consultation confirms that the sites in this area are to be considered in a comprehensive manner, including the need to ensure that joint responsibility is taken for the provision of necessary infrastructure both in the Town Centre and in relation to other sites.

103. The matters referred to in paragraph 266 of the Supplementary Consultation are vague and do not mention any need for increased Police infrastructure despite the fact that the scale of development proposed in and around the Town centre and the Mature Suburbs cumulatively, is significant and will inevitably have implications for the maintenance of safety and security and there is likely to be the need for additional Police infrastructure. This will be particularly relevant to development in the Town Centre and considerations

relating to the night time economy for example.

104. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

105. **In our view, there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.**

106. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of the Masterplans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

Question 29: Do you agree with the infrastructure requirements identified for Meriden, if not why not; or do you believe there are any other matters that should be included

107. Meriden Parish lies in the rural gap between the Coventry and Birmingham conurbations (the 'Meriden Gap'). Meriden Village is the main settlement within the Parish, Millison's Wood and Eaves Green being smaller.

108. Paragraph 281 of the Draft Solihull Local Plan Review Supplementary Consultation confirms that this settlement is suitable for limited growth and only one site is proposed for allocation with a potential capacity for 100 dwellings.

109. In terms of local infrastructure requirements, paragraph 289 of the Supplementary Consultation states that any new development would need to include assessment of local infrastructure, in particular school capacity and local medical facilities.

110. Paragraph 291 of the Supplementary Consultation refers to the Community Infrastructure Levy and highlights that the parish council will receive significant CIL funding to direct towards appropriate projects that the community identifies as priorities.

111. The need for new development to assess local infrastructure identified in paragraph 289, does not mention the need for increased Police infrastructure. Notwithstanding the relatively modest scale of growth proposed in Meriden, the cumulative impact of development anticipated in the Solihull Local Plan Review will impose a burden on Police resources and there will inevitably be implications for the maintenance of safety and security. Accordingly, there is likely to be the need for additional Police infrastructure.

112. The absence of positive reference within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

113. **In our view, there should be express reference to the need for financial**

contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.

114. In addition, the CCWMP requests that the Senior Leadership Team, Local Policing Unit and DOCTs are engaged in the final Master Plan brought forward for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

Question 31: Do you agree with the infrastructure requirements identified for North Solihull, Castle Bromwich and Marston Green, if not why not; or do you believe there are any other matters that should be included?

115. The area known as North Solihull (covering the wards of Chelmsley Wood, Kingshurst and Fordbridge and Smith's Wood) has a high proportion of local neighbourhoods within the 10% most deprived in the country and some in the bottom 5%. Characterised by 1960s housing estates, the layout of large parts of the area has resulted in poor connectivity and lack of natural surveillance which has contributed to the prevalence of anti-social behaviour, an increased fear of crime and an overall reduction in the quality of the environment.

116. Since 2005, a significant regeneration programme has been underway to improve the urban environment by delivering new housing schemes and community facilities, which coupled with socio-economic initiatives are revitalising the area with a view to addressing these issues.

117. North Solihull has also been identified as part of the wider UK Central proposals (as one of the four interconnected economic opportunity zones) as an area with potential to benefit from the significant development proposed at the adjacent UK Central Hub.

118. Paragraphs 315-317 of the Solihull Local Plan Review Supplementary Consultation confirm that the residential areas of Castle Bromwich and Marston Green are largely built up with little scope for future development other than windfall sites to increase the mix and affordability of housing. In terms of North Solihull future development in this area will focus on completion of the regeneration programme.

119. The proposed allocations identify a capacity of approximately 150 additional dwellings over the plan period, focused on Kingshurst Village Centre (for which a masterplan is being prepared) and Smiths Wood.

120. Paragraph 310 of the Solihull Local Plan Review Supplementary Consultation confirms that North Solihull forms one of the four zones identified through the UK Central programme which seeks to redistribute the benefits of the wider scheme.

121. The matters identified in paragraph 308-314 of the Solihull Local Plan Review Supplementary Consultation do not mention the need for increased Police infrastructure. Notwithstanding the relatively modest scale of growth proposed in this specific area, the cumulative impact of development anticipated in the Solihull Local Plan Review will impose a burden on Police resources and there will inevitably be implications for the maintenance of safety and security. Accordingly there is likely to be the need for additional Police infrastructure, particularly if the aspirations for the UK Central programme are realised.

122. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

123. **In our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth.**

124. In addition the CCWMP requests that the Senior leadership Team, Local Policing Unit and DOCTs are engaged in the preparation of Master Plans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local Plan Review is adopted.

d) Response to Question 44 – Other comments on the Draft Local Plan Supplementary Consultation

125. The CCWMP notes that the Draft Local Plan Supplementary Consultation identifies significant growth aspirations for the UK Central Hub area which is focussed on the main economic assets located around junction 6 of the M42. The Hub forms part of the wider UK Central proposals with four interconnected economic opportunity zones, including North Solihull, and Solihull town Centre.
126. Alongside the economic benefits the development of the Hub is an opportunity as part of the wider UK Central proposals to improve links with the surrounding area in particular North Solihull.

127. Paragraph 331 of the Supplementary Consultation confirms that the UK Central Hub site will make a significant contribution towards the delivery of homes and economic development in the Borough during the plan period and beyond. The UK Central Urban Growth Company (UGC) has been established by the Council to lead delivery of this major project.

128. In fact, the Hub is considered to be a unique site with the potential to deliver major growth on a nationally significant scale in phases, to meet the economic growth aims of the Borough as well as the wider growth aspirations of the Greater Birmingham and Solihull LEP and the West Midlands Combined Authority. The benefits of the proposals for the

Central Hub area include the delivery of a significant number of jobs, new homes for the Hub, Solihull and the wider Housing Market Area in addition to the delivery of strategic infrastructure.

129. Work undertaken to date indicates that the residential component will be focussed at Arden Cross and land at the NEC. These two areas are now predicted to provide 2,500 homes, delivered in the plan period.

130. Land is also set aside in the Draft Local Plan for further employment at Damson Parkway to allow for the future expansion of Jaguar Land Rover.

131. The Solihull Draft Local Plan Supplementary Consultation recognises the complexity involved in the delivery of this major scale of development at the Hub (paragraph 338).

132. Paragraph 339 of the Supplementary Consultation refers to the fact that the UGC has produced an updated UK Central Hub Growth and Infrastructure Delivery Plan (January 2018) to align the growth aspirations of all the relevant stakeholders and to identify how development and infrastructure can be delivered across the Local Plan period.

133. This confirms (on page 11) that the Growth and Infrastructure Plan contributes to the evidence base supporting the Local Plan Review. The Growth and Infrastructure Plan states that a significant amount of infrastructure is required to enable the realisation of the ambitions of the Hub. Whilst primary infrastructure will be the responsibility of various agencies, secondary infrastructure will fall under the remit of West Midlands Combined Authority and Solihull MBC (page 18-19 Growth and Infrastructure Plan).

134. Paragraph 344 of the Solihull Draft Local Plan Supplementary Consultation emphasises that it is important that the full range of facilities necessary to support the creation of high quality sustainable communities at the Hub are provided. These include healthcare and education facilities to serve residents of the Hub but also to enhance infrastructure serving the wider community.

135. The matters mentioned in paragraph 344 do not expressly refer to the need for increased Police infrastructure provision despite the major scale of development proposed which will inevitably have very significant implications for the maintenance of safety and security. The significant scale of economic and residential development proposed at the Hub will require considerable additional police infrastructure.

136. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.

137. **In our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands**

Police as a consequence of the proposed development growth in order to ensure that safety and security can be maintained across the Hub area and the wider area generally.

138. In addition, the CCWMP requests that the Senior Leadership Team, Local policing Unit and DOCTs are engaged in the preparation of Master Plans for the proposed land allocations and are also engaged in policy implementation and delivery once the Solihull Local plan Review is adopted.

Infrastructure and Implementation

139. The CCWMP formally requests that the Police are included within any list of bodies the Council intend to work in partnership with to ensure that essential infrastructure is delivered. In order to ensure appropriate infrastructure is provided at the appropriate time throughout the Borough, the CCWMP believes that it is vital that there is timely and effective engagement of the Police. This is imperative to ensure effective delivery of infrastructure projects required as a result of development growth with formal recognition that the police are a social infrastructure delivery agency.

Conclusions

The CCWMP has a statutory duty to secure the maintenance of an efficient and effective Police force for its area and the Council has a statutory requirement to consider crime, disorder and community safety in the exercise of its planning functions.

The CCWMP requests that in accord with national planning policy, the theme of community safety and crime prevention is given prominence in the Solihull Local Plan Review to promote improvements in community safety, reducing crime, fear of crime and anti-social behaviour, which are vital objectives in the context of creating sustainable communities.

In order to sustain the level of growth proposed in the Solihull Local Plan Review and to meet the national and local policy objectives relating to safety and security, contributions will be required through CIL/ S.106 agreements to help fund the provision and maintenance of Police services to create environments where crime and disorder and the fear of crime do not undermine the quality of life or social cohesion.

The Solihull Local Plan Review should make provision to mitigate the direct and additional policing impact that the anticipated growth will create to ensure sustainable development objectives enshrined in national and local policy are achieved.

The Safer Solihull Strategic Assessment 2018 highlights safety issues that can be predicted to occur within the Borough and discloses that recorded crime has increased by 20% since 2016 and based on previous data, this trend is likely to continue. Recorded violent crime in Solihull is forecast to increase over the next year as is anti-social behaviour. The Assessment also provides an overview of the threats and opportunities arising from the scale of development proposed in the Review Local Plan. The JSNA fails to prioritise all areas of crime adequately and is narrow in scope by focusing on domestic abuse rather than reflecting the findings of the Solihull Strategic assessment 2018 and to that extent is not proportionate in the context of the evidence base underpinning the Local plan Review.

In terms of the specific settlements referred to in the Supplementary Consultation and the proposed allocations, in our view there should be express reference to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of the proposed development growth to ensure that safety and security can be maintained across the Borough. This is particularly the case in terms of the major growth aspirations at the Hub.

In addition, the CCWMP formally requests that the Police are actively engaged with on an on-going basis in the future reviews of the IDP to ensure that the evolving needs of policing are kept up-to-date and are taken into consideration.

Further, the CCWMP formally requests that the Police DOCTs, Senior Leadership Team

and Local Policing Unit are effectively engaged in the planning and design process in relation to matters likely to affect crime and the fear of crime, in the preparation of masterplans and policy implementation.

Our client would be grateful if you could ensure that these representations are taken into consideration in the context of the Supplementary Consultation and the Local plan Review process.

We would be grateful if you would acknowledge receipt this letter of representation on behalf of CCWMP.

Yours faithfully,

Glenda J Parkes, Dip.TP.,MRTPI
Director
The Tyler-Parkes Partnership Ltd
[redacted]

Enclosures.

Enc 1 : Solihull Local Plan Review Letter of representation Dated 14/12/16
Enc 2 : Appeal decisions – APP/E3715/W/16/3147448 and APP/T3725/A/2229398

Enclosure 1: Solihull Local Plan Review letter of representation dated 14th of December 2016

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Planning and Architecture | advice | applications | drawings

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14th 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

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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]

Enclosure 2: Appeal decisions – APP/E3715/W/16/3147448 and APP/T3725/A/2229398

See attachments.