



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

**(For
official
use only)**

Name of the Local Plan to which this representation relates:

Solihull MBC Local Plan

Please return to psp@solihull.gov.uk or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14th December 00:00

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
<p><i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i></p>	
Title	<input type="text" value="Mrs"/>
First Name	<input type="text" value="Glenda"/>
Last Name	<input type="text" value="Parkes"/>
Job Title	<input type="text" value="Director"/>
(where relevant)	
Organisation	<input type="text" value="Tyler Parkes"/>
(where relevant)	
Address Line 1	<input type="text" value="66 Stratford Road"/>
Line 2	<input type="text" value="Shirley"/>
Line 3	<input type="text" value="Solihull"/>
Line 4	<input type="text"/>
Post Code	<input type="text" value="B90 3LP"/>
Telephone Number	<input type="text" value="[REDACTED]"/>
E-mail Address	<input type="text" value="[REDACTED]"/>
(where relevant)	

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Objection on behalf of the Chief Constable of the West Midlands Police (CCWMP) (8980)

Policy P1 UK Central Solihull Hub Area

Paragraphs 72 to 108

- On behalf of the Chief Constable of the West Midlands Police (CCWMP) we are instructed to make representations on the Solihull Local Plan Review 2020. **In terms of Policy P1 'UK Central Solihull Hub Area' it is contended that Policy P1 is unsound on the basis that that given the scale and type of development proposed in the hub area, there should be express reference in the policy to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police; as an element of social infrastructure required to deliver sustainable development to ensure that safety and security can be maintained across the Borough, as anticipated in the hub Framework Plan (HFP) 2018. There is a clear expectation in the HFP 2018 that the SLP will provide the appropriate planning mechanism to ensure S.106 contributions/CIL deliver police infrastructure. The omission of an explicit reference to the need for financial contributions for Police infrastructure in the overarching UK Central Hub Policy of the Plan or in its supporting text, renders the policy ineffective and inconsistent with national policy and , therefore, unsound.**

2. **Policy P1 and its supporting text omits any reference to the fact that development proposals within the hub should be expected to demonstrate how they have considered security and safety and how they achieve Secured by Design standards across the entirety of the hub area. It is contended that without such references, Policy P1 and its supporting text as worded is ineffective and inconsistent with national policy and is therefore unsound.**
3. **It is submitted that the omission of a reference to the evening economy within the wording of Policy P1 renders the policy inconsistent with national policy and is, therefore, unsound**
4. On behalf of the Chief Constable of the West Midlands Police (CCWMP) we 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).
5. 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'.
6. 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.
7. The CCWMP is grateful for the opportunity to comment on the Solihull Local Plan Draft Submission Plan (SLP Draft Submission Plan) as part of the Solihull Local

Plan Review. The comments set out in this representation are in addition to the matters raised in our earlier letters dated the 14th of December 2016 (Enclosure 1) and the 15th of March 2019 (Enclosure 2). Those previous representations concerning the Draft Local Plan Supplementary Consultation, in respect of proposed changes, remain pertinent to the plan making process.

Purpose of the Consultation on the SLP Draft Submission Plan and Summary of CCWMP Comments:

8. The purpose of the consultation on the SLP Draft Submission Plan relates to whether the plan, as published, complies with the relevant legal requirements and is sound.
9. The focus of this representation, made on behalf of the CCWMP, relates to whether specific policies in the plan are sound.

Policy P1 UK Central Solihull Hub Area

10. In summary, this representation concludes the following.
11. 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.
12. In order to sustain the level of growth proposed in the SLP Draft Submission Plan, in particular in relation to Policy P1 and to meet national and local policy objectives relating to safety and security, contributions will be required through S.106 agreements and/or CIL payments to help fund the provision and maintenance of Police services.
13. In terms of Policy P1, IT is contended that given the scale and type of development proposed in the hub area, there should be express reference in the policy to the need for financial contributions towards the additional expenditure burden placed on West Midlands Police; as an element of social infrastructure required to deliver sustainable development to ensure that safety and security can be maintained across the Borough, as anticipated in the hub Framework Plan (HFP) 2018. There is a clear expectation in the HFP 2018 that the SLP will provide the appropriate planning mechanism to ensure S.106 contributions/CIL deliver police infrastructure. The omission of an explicit reference to the need for financial contributions for Police infrastructure in the overarching UK Central Hub policy of the Plan or in its supporting text, renders the policy **ineffective and inconsistent with national policy and is therefore unsound.**
14. Policy P1 and its supporting text omits any reference to the fact that development proposals within the hub should be expected to demonstrate how they have considered security and safety and how they achieve Secured by Design standards across the entirety of the hub area. It is contended that without such references, Policy P1 and its supporting text as worded is **ineffective and inconsistent with national policy and is therefore unsound.**
15. It is submitted that the omission of a reference to the evening economy, within the wording of Policy P1 renders the policy inconsistent with national policy and is therefore unsound

16. The Police should be actively engaged on an on-going basis in the future reviews of the masterplans relating to the UK Central Hub Area and the consideration of SPDs, to ensure that the evolving needs of policing are kept up-to-date and are taken into consideration.
17. The Police Design Out Crime Team, Senior Leadership Team and Local Policing Unit should be 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.
18. These representations on behalf of the CCWMP are directed at the above points and are considered on the basis of:
 - a) Planning Policy Background
 - b) Justification for Police Infrastructure provision and emphasis on safety and security considerations within Policy P1
 - c) Is Policy P1 of the SLP Draft Submission Plan sound?

a) Planning Policy Background

National Planning Policy Framework, February 2019

19. 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.
20. 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.
21. 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.
22. 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.**
23. 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.
24. 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.

25. 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.
26. 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.
27. 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.
28. 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.
29. Paragraph 127(f) 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.

National Planning Practice Guidance (PPG)

30. The national 'Planning Practice Guidance' (PPG) was updated in July 2019 and in the context of design, confirms that the previous guidance has been replaced. Paragraph:001 reference ID: 26-001-20191001 states that well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process. To be read alongside this guidance, The National Design Guide sets out the characteristics of well-designed places and highlights in the section entitled 'Public Spaces' that well-designed places should feel safe and help overcome crime and the fear of crime.
31. Paragraph: 001 Reference ID: 26-001-20191001 reiterates that paragraph 130 of the NPPF sets out that permission should be refused for development of poor design that fails to take the opportunity of promoting healthy and safe communities.

32. Paragraph: 004 Reference ID: 26-004-20191001 confirms that non-strategic policies can be used to establish more local and/or design principles for an area, including design requirements for site specific allocations.
33. The PPG also includes a section entitled 'Supporting safe communities, which emphasises that planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services it provides.
34. The PPG highlights the importance of Section 17 of the Crime and Disorder Act 1998 (as amended) which requires all local, joint and combined authorities to exercise their functions with due regard to their likely effect on crime and disorder and do all they can to prevent crime and disorder. Crime for these purposes includes terrorism (Paragraph:009 Reference ID: 53- 009- 20190722).
35. Paragraph: 010 Reference ID:53-010-20190722 sub-titled 'How can planning help to achieve resilient places?' states that good design, that considers security as an intrinsic part of a masterplan or individual development, can help achieve places that are safe as well as attractive, which function well and which do not need subsequent work to achieve or improve resilience. However, good security is not only about physical measures and design; it requires risks and mitigation to be considered in a holistic way.
36. The PPG highlights that local authorities may find it helpful (either through decision taking or plan making) to undertake a Security Considerations Assessment (SCA), or to take into account a SCA process undertaken by developers and other applicants as part of the design of new developments. A SCA is a mechanism by which organisations can demonstrate, through a fully documented process, that potential security-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate (Paragraph: 010 Reference ID: 53-010-20190722).
37. The PPG confirms that good design means a wide range of crime from theft to terrorism are less likely to happen by making committing those crimes more difficult. It helps create safer places, infrastructure and buildings that are less vulnerable to terrorist attack and should an attack take place, where people are better protected from its impacts (Paragraph:010 Reference ID: 53-010-20190722).
38. The PPG also states (Paragraph: 011 Reference ID: 53-011-20190722) that for all locations which will generate crowds in public places, applicants and local planning authorities should consider appropriate security measures in the design of buildings and spaces. Good counter-terrorism protective security can also support wider prevention. The PPG identifies a number of sources of guidance in this respect including 'Protecting Crowded Places: Design and Technical Issues', which refers to 'Secured by Design and 'Safer Parking' standards.

(<https://www.gov.uk/government/publications/protecting-crowded-places-design-and-technical-issues>)
39. Paragraph: 011 Reference ID: 53-011-20190722 also states that the consideration of security requirements will need to be proportionate to the size and nature of the development, the anticipated number of users and the wider setting. As well as understanding the purpose of the site, how it will operate and its potential to be regularly crowded, consideration will need to be given to the measures that directly or indirectly mitigate identified threats as far as is proportionate. This could include

protection of the public from vehicles used as weapons or as an Improvised Explosive Device.

40. In terms of Plan making, Paragraph 042 reference ID: 61-042-20190315 provides that in evidence gathering, strategic policy-making authorities where appropriate, will need to:
- 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; and
 - involve Police and appropriate design advisers in the preparation of site allocations in emerging plans.
41. Paragraph: 004 Reference ID: 23b-004-20190901 of the PPG relates to planning obligations and provides that policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. Such policies should, inter alia, be informed by evidence of infrastructure and a proportionate assessment of viability. The paragraph emphasises that planning obligations assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure.
42. In terms of the Community Infrastructure Levy (CIL) Paragraph 011 Reference ID: 25-011-20190901 states that charging schedules should be consistent with and support the implementation of up-to-date relevant plans.
43. Paragraph: 012 Reference ID: 25-012-20190901 provides that the relevant plan is any strategic policy, including those set out in any spatial development strategy. Charging schedules are not formally part of the relevant plan but charging schedules and relevant plans should inform and be generally consistent with each other.
44. In relation to the levy, Paragraph: 017 Reference ID: 25-017-20190901 states inter alia, that charging authorities must identify the total cost of infrastructure they wish to fund wholly or partly through the levy. In addition, the paragraph states that information on the charging authority's area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken when preparing the relevant plan (the local plan) and their CIL Charging Schedule. This is because the Plan identifies the scale and type of infrastructure needed to deliver the area's local development and growth needs (see paragraph 34 of the NPPF). In addition, the Community Infrastructure Levy examination should not re-open infrastructure planning issues that have already been considered in putting place a sound relevant plan.
45. Paragraph: 144 Reference ID: 25-144-20190901 states that the levy can be used to fund a wide range of infrastructure, including police stations and other community safety facilities.
46. Paragraph: 166 Reference ID: 25-166-20190901 confirms that developers may be asked to provide contributions for infrastructure in several ways. This may be by way of CIL or S.106 agreements. Authorities can choose to pool funding from

different routes to fund the same infrastructure, provided that authorities set out in their infrastructure funding statements which infrastructure they expect to fund through the levy.

47. Paragraph: 167 Reference ID: 25-167-20190901 confirms that the levy is not intended to make individual planning applications acceptable in planning terms. As a result, some site-specific impact mitigation may still be necessary for a development to be granted planning permission. There is still a legitimate role for development specific planning obligations, even where the levy is charged, to enable a local planning authority to be confident that the specific consequences of a particular development can be mitigated.
48. Paragraph: 169 Reference ID: 25-169-20190901 provides that the levy delivers additional funding for charging authorities to carry out a wide range of infrastructure projects that support growth and benefits the local community. Authorities can choose to use funding from different routes to fund the same infrastructure. Authorities should set out in infrastructure funding statements which infrastructure they expect to fund through the levy and through planning obligations (Regulation 121A). For example, a local authority may set out in their plan that they will use S.106 planning obligations to deliver a new school to serve additional pupils arising as a result of development on a strategic site.
49. Paragraph: 170 Reference ID: 25-170-20190901 confirms that amendments to the regulations removed the previous restrictions on pooling more than 5 planning obligations towards a single piece of infrastructure. This means that subject to meeting the 3 tests set out in CIL Regulation 122, charging authorities can use funds from both the levy and S.106 planning obligations to pay for the same piece of infrastructure, regardless of how many planning obligations have already contributed towards an item of infrastructure.

Chief Planning Officer letter, July 2017

50. On the 12th July 2017, a letter from the Chief Planning Officer was published by the Department of Communities and Local Government. This reminded 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

51. '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

52. 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.

53. The justification for Policy P5 of the adopted SLP, Figure 15, 'Table of allocated sites' sets out proposed site allocations with 'Likely infrastructure Requirements' including '....Consider impact on social infrastructure provision, e.g. emergency services and community facilities' for each site. Adopted policy therefore recognises the need for and legitimacy of, potentially seeking developer contributions towards maintaining Police infrastructure as part of the emergency services.
54. 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.
55. Policy P18 promotes health and wellbeing 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.
56. 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 it is considered 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.

Solihull Local Plan Review

57. Through the review of the Local Plan, Solihull Council seeks to deliver a significant level of development during the plan period. On behalf of the CCWMP representations have previously been made (letter dated 14th of December 2016 attached as Enclosure 1) in respect of Policies P2, P15, P18 and P21. These representations referred 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.
58. In addition, a letter of representation dated 15th March 2019, was submitted on behalf of CCWMP in relation to the Draft Local Plan Supplementary Consultation (attached as enclosure 2). Again this representation highlighted the need for policy reference to matters of safety and security and the need for express reference to the need for financial contributions towards the additional burden placed on West Midlands Police, as a consequence of the proposed growth to ensure that safety and security could be maintained across the Borough. In relation to the UK Central Hub Area, paragraphs 125-138 of our letter of the 15th of March remains relevant.
59. The SLP Draft Submission Plan identifies a number of challenges facing the

Borough and the objectives for addressing them. Challenge F 'Reducing inequalities in the Borough' (page 17) highlights the fact that there are significant levels of deprivation, crime and the fear of crime in north Solihull and pockets of deprivation and anti-social behaviour crime around the Borough in the Mature Suburbs and in the Rural areas.

SLPR Draft Infrastructure Delivery Plan October 2020 (IDP)

60. The SLPR Draft Infrastructure Delivery Plan (IDP) 2020 is a key component of the evidence base to support the Local Plan. The IDP provides a baseline of the existing infrastructure capacity and needs in the Borough, highlighting the infrastructure requirements to support the predicted growth set out in the Local Plan. It provides a snapshot at the time of publication and states that over the plan period, infrastructure priorities may change. It is intended that the IDP will be updated at the submission stage of the Local Plan and then reviewed on an annual basis following adoption of the Local Plan.
61. Paragraph 1.3 of the IDP confirms that high quality, reliable and robust infrastructure is crucial to sustainable economic growth. The IDP is a basis of information for understanding the deliverability of proposed allocations and levels of growth and may also be used as part of the evidence base in preparing the Community Infrastructure Levy (CIL) Charging Schedule, which will be reviewed as part of the Local Plan Review.
62. The Draft IDP confirms (at paragraph 1.3 page 4), that well-informed and co-ordinated infrastructure planning plays a key role in competitiveness, unlocking growth and providing best value for investment at a local, regional and national scale.
63. Infrastructure is defined, at section 1.5 of the Draft IDP, as including 'social' infrastructure required to enable sustainable development. The Draft IDP confirms that social infrastructure includes the requirements of the Emergency Services, including the Police.
64. In the light of Paragraph 20 of the NPPF, which requires strategic policies to make sufficient provision for inter alia infrastructure for security, in the context of delivery mechanisms, the Draft IDP confirms at paragraph 1.8 (page 9), that new developments will be expected to meet their own infrastructure needs. Further, where new development puts pressure on social infrastructure, the Draft IDP explicitly acknowledges that provision will also have to be made for this.
65. The CCWMP welcomes and **supports** the inclusion of Police infrastructure in the Draft IDP (Section 4.4 pages 87-88) and the accompanying IDP Schedule (Appendix A of the IDP); necessary social infrastructure to meet the needs of policing the planned level of growth in the Local Plan, through contributions from developers secured through S.106 agreements relating to proposals set out in the Local Plan.
66. As part of its evidence base to support the SLP Draft Submission Plan, the Council commissioned a Viability Study (Cushman and Wakefield Viability Study - October 2020). The Viability Study tested a contribution of £150 per unit towards Police infrastructure (page 12 of the Viability Study) and has confirmed that the level of contribution sought would be viable (as indicated on Page 88 of the Draft IDP). However, in the light of the importance of ensuring safety and reducing crime and the fear of crime endorsed in national policy, the IDP Schedule should state that the provision of Police infrastructure is **essential** rather than desirable.

67. There is concern that the identification of police infrastructure, within the definition of social infrastructure, is not reflected in the overarching developer contributions and infrastructure Policy P21 of the SLP Draft Submission Plan (see Enclosure 3 - paragraphs..... for detailed reps on Policy P21).

Hub Framework Plan 21st of February 2018 - Issue 2

68. The UK Central Hub ('The hub') in Solihull is being promoted as one of the country's most strategically important development sites and one of the region's major drivers of economic growth. The ambition is to create a globally renowned and internationally connected destination for business, leisure and living, facilitated by the Urban Growth Company (UGC), with the support of local and central government.
69. The hub Framework Plan (HFP) Issue 2 (2018), is a non-statutory plan and is one of a suite of documents related to the UK Central area and builds on the vision and growth strategy established in the UGC's Hub and Growth Infrastructure Plan 2017. It forms part of the evidence base supporting the Solihull Local Plan Review. The HFP states (page 9) that Solihull Council has provided UGC with the remit to implement a co-ordinated approach to the delivery of infrastructure within the hub "*.....and which will help inform and relate to the Solihull MBC Local Plan Review. The Framework will not seek to establish planning policy*".
70. These documents are intended to inform and guide future development to ensure high quality and sustainable places are delivered. The HFP also establishes the range of infrastructure required. The HFP confirms (at page 9) that the collective evidence should inform the current Local Plan Review being undertaken by Solihull Council. The HFP seeks to provide an overall cogent view of how development and infrastructure can be delivered across the Local Plan period.
71. The vision for the hub promotes '*....a well-connected development, delivering high quality environmental, social and economic growth which will enable and contribute to required infrastructure*' (page 9 HFP).
72. To deliver the vision and its objectives, the HFP identifies five place making principles, one of which seeks to generate a sense of place (page 47) by encouraging character and distinction.
73. It is anticipated that one of the outcomes of this principle will be to create developments with "*Active streets and public realm with passive surveillance, that are connected, which will contribute towards their use and develop a greater sense of safety and security*" (page 58). This is the only reference to safety and security within the HFP.
74. In relation to infrastructure, the HFP states (page 11), that secondary infrastructure will fall under the remit of the West Midlands Combined Authority and Solihull Council. Further, a range of social infrastructure will be required in the hub, in particular facilities linked to the delivery of new homes and communities. It also provides that "*.....ambulance, fire, **policing**, open space/leisure and community facilities will also be required to deliver sustainable, quality places*" (emphasis added).
75. The total cost of delivering the infrastructure associated with the hub area is in the region of £1.74 billion, over the life of the scheme. Whilst the main projects relating to infrastructure involve significant transport improvements and utilities schemes,

the HFP also recognises the need for social and community infrastructure (page 94 HFP). The HFP states (page 93), that social and community infrastructure relates to the provision of facilities that create a more balanced community and includes education, health, leisure **and emergency services**, in addition to green infrastructure and open space (emphasis added). The HFP considers social infrastructure primarily in the context of the residential elements of development. The HFP confirms that the delivery of social infrastructure is based on policy requirements of building high quality, sustainable communities.

76. The HFP confirms (page 91), that it is supported by an Infrastructure Investment Appraisal (IIA), which confirms that the hub will need to be supported by inter alia, *'social and community infrastructure'* (emphasis added). Page 101 of the HFP identifies the mechanisms through which the costs of infrastructure will be expected to be delivered and refers to the planning legislation mechanism, including S.106 and CIL, which will be determined on a scheme-by scheme basis.
77. In terms of social and community facilities, the HFP (page 109), confirms that the provision of these are typically the domain of the developer to provide under policies and requirements of the local authority.
78. It is clear from the above that there is an expectation in the documents informing and supporting the Local Plan Review, in particular the HFP (page 11), that social infrastructure, including that related to the needs of the Police, will be provided through mechanisms set out in the policies of the SLPR.

The Hub Growth and Infrastructure Vision 2019

79. Hub Growth and Infrastructure Vision (HGIV) 2019 confirms that the aim of the UGC is to deliver a compelling and sustainable new part of the Borough, including mixed use development. The aspiration is to deliver up to 5,000 new homes by 2047, significant employment, retail and commercial development creating 77,500 jobs and wide scale public transport and highways improvements, creating an internationally renowned destination in its own right. The HGIV (at page 6) describes the proposals for The hub area as *"...unrivalled in terms of the scale of the developmentthe infrastructure investment..."*.
80. Apart from the significant scale of commercial and employment development across the hub area, the HGIV confirms (page 6) that the *"NEC-Campus will become a 24/7 entertainment, leisure and business destination"* and *"Arden Cross will be a sustainable destination of choice providing a high quality space for business, leisure and living"*.
81. The HGIV sets out how the preparation, delivery and growth will be delivered in phases.

The Arden Cross Masterplan

82. The Arden Cross Masterplan (ACM) states (page 2) that *"Arden Cross is a nationally significant development opportunity to create a world leading economic hub that co-locates business, living and learning within a fantastic urban realm complemented by high quality infrastructure"*.
83. The 140-hectare site will support up to 27,000 jobs and up to 3,000 new homes.
84. The ACM confirms (at page 3) that Arden Cross is a key part of UK Central (UKC), a dynamic cluster of economic assets including Birmingham Airport, the NEC,

Birmingham Business Park, Birmingham International Rail Station and Jaguar Land Rover.

85. The ACM sets out a framework and structure for development (page 25, fourth bullet point). In terms of the vision for Arden Cross and the components of development, the ACM states (page 9), that “*the residential community will be formed by high quality density urban living that is set among a green landscaped environment with parkland at its heart*”. With up to 3,000 homes, supported by community facilities, it suggests that future residents will have access to a diverse mix of employment, leisure, and recreational opportunities alongside unrivalled connectivity by road, rail and air. The Arden Cross site is presented as an opportunity to create a new ‘urban settlement’ within the hub area (page 20).
86. At section 6, the ACM sets out a number of development principles relating to the proposed design strategy and integrated transport proposals. The focus of the infrastructure delivery principles relates to phased enabling infrastructure, which is primarily associated with highway improvements and connectivity. There is no reference in the ACM development principles to the importance of safety and security, reducing crime or the fear of crime.
87. Section 6.6 of the ACM relates to the issue of delivering community infrastructure and highlights (page 22) that provision will be made for ‘*on-site primary and nursery education, health care and well-being, leisure and community centres*’. There is no reference to social infrastructure, including emergency services infrastructure, within the ACM.

The NEC Masterplan

88. The NEC Masterplan (NECM) confirms (‘Foreword’ page 1), that the ‘nec-city’ is part of the UK Central Hub and is suggested to be a transformational development, which seeks to harness the appeal and success of the NEC by re-developing 75 hectares of land with a new theatre district, high quality residential, environmental and bespoke commercial offer, to provide a global entertainment, leisure and business destination. It could generate up to 315,000 sq m of new floorspace, targeting 10,000 jobs and delivering up to 2,500 new homes.
89. Spanning a 20-year period, the NECM will drive delivery of a new type of destination, which will benefit from major new infrastructure, mixed use developments and job creation.
90. Page 5 of the document confirms that the NECM is fully aligned to the proposals for the wider UK Central Hub and will be adopted as the vision for the future of the site, guiding investment and development decisions.
91. Section 3 of the NECM states that “...nec-city will become an internationally unique destination with global appeal that fuses entertainment, leisure, exhibition space, commercial and residential offers across a 175-hectare campus.
92. The NECM identifies zones of development and includes an entertainment zone, which will be a unique business and visitor destination, offering a range of experiential leisure opportunities alongside a film and tv production facility. It is proposed that the new environment will include themed leisure activities, permanent staging and flexible performance space, complemented by high-quality retail, hospitality and associated business space.
93. The Lakeside zone will offer a new destination providing an expanded leisure offer

including bars, restaurants, boutique hotels and family attractions set in public space, to generate greater animation day and night. Distinctive residential development at Lakeside will “.....attract a new community and will consolidate nec-city as a ‘micro-city’...” (page 17 NECM).

94. The NECM sets out five development principles which will help to deliver the vision and are designed to underpin the creation of ‘nec-city’ as a sustainable place.
95. In terms of design, (page 20) the Masterplan confirms that the design of streets, public spaces, public realm and buildings will reflect a consistent high quality throughout. Page 36 of the NECM refers to the design principles in more detail but fails to refer to the importance of safety and security, reducing crime or the fear of crime.
96. In relation to delivery, (page 42) states that the scale of the site and proposed development requires a phased approach to development, with the Piazza and Lakeside being the focus for early development.

b) Justification for Police Infrastructure provision and emphasis on safety and security considerations within Policy P1

97. The detailed justification for contributions towards Police infrastructure provision is set out in the representation, on behalf of the CCWMP, relating to Policy P21 ‘Developer Contributions and Infrastructure Provision’. In the interests of brevity the detailed justification is not repeated here, but the matters set out in detail in the representation are relevant to the consideration of the need for a reference to S.106/CIL contributions for Police infrastructure in the context of Policy P1 and should be taken into consideration.
98. As is set out in the representation relating to Policy P21, the Council’s recognition in the Draft IDP of the need to ensure that funding is secured for Police infrastructure requirements, arising from the scale of development proposed in the Local Plan, through the mechanism of S.106 obligations, is welcomed as an acceptance in principle of the relevance and significance of such issues, in delivering sustainable and safe communities. It is maintained, however, that in order to be consistent with national policy it is essential that the need to ensure that funding is secured to mitigate the impact of development on Police infrastructure, arising from the proposed levels of growth, is expressly referred to in the policies and supporting text of the Draft Submission Local Plan, including Policy P1, for the following reasons.
99. The scale of the development proposed during the plan period will inevitably have implications for the maintenance of safety and security in the Borough and, there will clearly be a need for additional Police infrastructure. 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. The aim is to deploy additional staffing and additional infrastructure to cover the demand from new development, at the same level as the policing delivered to existing households. Hence, additional development would generate a requirement for additional staff and additional personal equipment (such as workstations, radios, protective clothing, uniforms, and bespoke training), police vehicles of varying types and functions.
100. If additional infrastructure is not provided, the level of growth envisaged in the SLP Draft Submission Plan 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. It is submitted that that outcome would be contrary to national policy.

101. With significant levels of development growth particularly within the hub area, the demands placed on the police service will increase, as the local population 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. It is obvious that the considerable levels of growth anticipated in the hub area, within SLP Draft Submission Plan, will place additional and increased burdens on local services, including Police services. Future residents', visitors 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 and this is not presently provided for within the SLP Draft Submission Plan.
102. 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, are essential, as acknowledged in the HFP 2018.
103. This is particularly relevant in the context of Policy P1. The SLP Draft Submission Plan expressly recognises in paragraph 72 that the UK Central Hub area "*presents a unique opportunity on a nationally significant scale to bring forward major growth*". This scale of development is anticipated to contribute to wider strategic ambitions, making a substantial contribution to the economic growth aims of the West Midlands Combined Authority and the GBSLEP. Paragraph 1 of policy P1 confirms that the hub area offers "*the greatest potential for growth in the Borough and includes a major strategic mixed use site at Arden Cross which will deliver significant employment and residential development both during and beyond the Plan period; and will make a significant contribution to the wider west Midlands economy*".
104. To help achieve this growth, paragraph 75 of the supporting text to policy P1 states that a proper *planning framework is needed that can encourage, guide and facilitate development to take place*. Further, paragraph 79 of the supporting text highlights that the hub *embraces a unique concentration of economic assets* and states that "*What is needed as part of this plan is a policy approach that allows these assets to flourish whilst providing a framework to ensure that the resulting developments provide a well integrated sense of place, with easy access through the area and is supported by appropriate infrastructure*" (emphasis added).
105. Whilst the objectives set out in paragraphs 75 and 79 of the supporting text to Policy P1 are supported, it is contended that Policy P1 fails to achieve the appropriate policy framework referred to in those paragraphs. By failing to reference social infrastructure, 'appropriate infrastructure', as referred to in paragraph 79 of the supporting text to Policy P1 to support development of the hub, it is submitted that Policy P1 is deficient in terms of its ability to delivery of the expressed objectives of paragraph 75 and 79.
106. Paragraph 3 of Policy P1 sets out the key objectives that development proposals within the hub will be expected to demonstrate. Sub-paragraphs 3 i-viii refer to transport, energy, power, digital green and blue infrastructure, but fails to include a reference to the provision of social infrastructure. This represents a significant policy omission, in the light of the clear acknowledgement in the HFP 2018 (which is part of the evidence base supporting the SLPR) that the hub development requires a range of social infrastructure such as emergency services facilities and requirements, including those relevant to policing. The HFP confirms that the

delivery of social infrastructure is based on policy requirements of building high quality, sustainable communities. The HFP specifically states that the costs of such infrastructure will be expected to be delivered through the mechanism of S.106 agreements and CIL, under policies of the Local Plan (pages 91, 101 and 109 of the HFP). Policy P1 as worded in the Draft Submission Plan fails to provide the mechanism that the HFP regards as necessary to deliver social infrastructure, including that required to ensure effective policing of the new development.

107. Policy P1 is therefore inconsistent with the evidence base supporting the Plan. In accordance with paragraphs 20 b) and 34 of the NPPF, the wording of Policy P1 should recognise and include the requirement for social infrastructure, including that required for policing, as set out in the supporting evidence in the HFP 2018 and in the Draft IDP. As currently worded, Policy P1 is inconsistent with national policy.
108. The UK Central Solihull Hub Area is critical to the growth aspirations of the SLPR. It is submitted that it is imperative that, as the overarching policy relating to the hub, Policy P1 should be specific in terms of ensuring that it provides a comprehensive policy framework for development and associated infrastructure within the area. It should therefore include a specific reference to social infrastructure, including for policing.
109. It is submitted that this is particularly relevant in the light of the fact that paragraph 87 of the justification relating to Policy P1 states that "*The Council will expect those promoting development via planning applications to demonstrate, in greater detail, how the criteria in Policy P1 have been met and to use the guidance in the hub Framework Plan*". It is submitted that the need to provide for social infrastructure should be identified as one of the criteria in Policy P1.
110. In addition, paragraph 3 vi of Policy P1 requires development proposals to "*Create distinct and unique places with a strong sense of identity, incorporating high quality design and innovation for development and the public realm, whilst maximising the efficient use of land*". The requirement for high quality design is supported, but it is contended that the policy is ineffective and inconsistent with national policy as it omits to emphasise the need for developments to create safe places and adhere to 'Secured by Design' principles, which given the scale and type of development proposed at the hub is a significant consideration.
111. As set out in section a) above, the updated Planning Practice Guidance (PPG) emphasises the relevance of safety and security issues in the design process both in terms of plan-making and decision-taking. Paragraph: 010 Ref ID: 53-010-20190722 highlights the importance of Security Considerations Assessments to consider how potential security-related vulnerabilities have been identified, assessed, and addressed.
112. Paragraph: 011 Ref ID: 53-011-20190722 states that for all locations which will generate crowds in public places, appropriate security measures should be considered on a proportionate basis depending on the size and nature of the development and the anticipated number of users, so that consideration can be given to measures to mitigate identified threats.
113. In the context of Policy P1, given the scale and type of development envisaged, it is submitted that explicit reference should be made in paragraph 3 vi to security and safety issues as essential considerations in the design process. Development within the hub area envisages large-scale mixed-use proposals, including residential development and proposals which will attract significant

crowds throughout the day and evening. As the supporting documents referred to above confirm, the hub will become a destination with entertainment, hospitality, and leisure facilities of national significance, within a parkland setting. The HFP 2018 makes minimal reference to the issues of safety and security.

114. In accordance with the guidance in the PPG, the size, nature and anticipated number of users attracted to the hub, warrants a proportionate emphasis on safety and security within Policy P1 as the overarching SLPR policy designed to facilitate such development. The Policy should include reference to safety and security and 'Secured by Design' standards as an important and relevant criterion. This is particularly relevant in the light of the fact that paragraph 87 of the justification relating to Policy P1 states that "*The Council will expect those promoting development via planning applications to demonstrate, in greater detail, how the criteria in Policy P1 have been met and to use the guidance in the hub Framework Plan*". As worded, Policy P1 is inconsistent with national policy due to the omission of any reference to safety and security issues.
115. Whilst it is accepted that Policy P15 sub-paragraphs vii and ix, of the SLP Draft Submission Plan relate to design considerations, which highlight the need to take account of safety and security and 'Secured by Design' standards, Policy P1 does not cross-refer to it. Notwithstanding the matters set out in Policy P15 relating to safety and security, due to the scale, nature and mix of uses proposed within the hub, it is submitted that there should be explicit reference to these considerations in Policy P1 to provide a bespoke, comprehensive policy framework to guide development within this critical area, as envisaged by paragraph 87 of the supporting text.
116. Further, PPG Paragraph 042: Ref ID: 61-042-20190315 provides that in terms of strategic plan-making, local authorities will need work inter alia, with the Police to develop local strategies for appropriate security measures at public buildings and spaces and should work with local Police Counter-Terrorism Security Advisors and others. There is concern that there is no reference to partnership working with the West Midlands Police in the supporting text to Policy P1. In accordance with the guidance in the PPG, 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.
117. The hub Growth and Infrastructure Vision 2019 indicates that as part of the hub development, the NEC-campus will become '*a 24/7 entertainment, leisure and business destination*'. It is also likely that other elements of the hub development will include night-time entertainment and leisure venues contributing to the evening economy.
118. Policy P1 fails to address the issue of the evening economy and is accordingly, inconsistent with national policy. It is considered that the evening economy raises particular safety and security issues that need to be highlighted in Policy P1 and its supporting text so that people can feel safe, with measures incorporated into the design of development to reduce crime and the fear of crime.
119. The specific considerations relating to the evening economy include matters such as safe access to and from the facilities, safe and secure parking facilities which meet 'Park Mark' standards, CCTV facilities within bars, cafes and restaurants and other entertainment and leisure venues and the safe positioning of Automatic Teller Machines (ATMs).

120. It is considered essential that reference should be made in [Policy P1](#) to the evening economy, the need to take account of security issues and the need to reduce crime and the fear of crime and anti-social behaviour. Paragraph 3 of Policy P1 should include a reference to this issue and emphasise that in order to have a successful evening economy it is important to provide facilities in such a way as to ensure a safe, accessible and inclusive environment, so that anti-social behaviour is discouraged and crime and the fear of crime is minimised.
- c) Is Policy P1 of the SLP Draft Submission Plan sound?**
121. The CCWMP welcomes and **supports** the recognition in the HFP 2018 that development within the hub area will be expected to provide for social infrastructure, including for the emergency services and policing, to support the needs associated with this nationally significant scale of development. It is contended however, that as the HFP is a non-statutory document, which may be subject to change and which does not carry the weight of adopted policy, the requirement for social infrastructure to be delivered through the mechanism of S.106 obligations /CIL (as envisaged in the HFP), should be specified and clearly expressed in Policy P1. As worded, Policy P1 is inconsistent with the HFP 2018. Policy P1 fails to refer to social infrastructure and as worded, it is **unsound** as it is not effective and is not consistent with national policy as set out in paragraph 34 of the NPPF.
122. The Local Plan Review provides an opportunity to establish an appropriate policy framework for future development across the Hub area. Whilst the provision of other types of infrastructure are highlighted as important in paragraph 3 of Policy P1, there is no reference to social infrastructure in the Policy itself nor in the supporting explanatory text. Accordingly, it is submitted that insufficient policy weight has been given to the provision of essential Police infrastructure. As worded, Policy P1 is inconsistent with the evidence base supporting the plan, in particular, the HFP 2018 and is **unsound**.
123. Paragraph 004 Reference ID: 23b-004-20190901 of the PPG states that policy requirements for planning obligations should be **clear**.
124. As highlighted in section b) above, there is a compelling justification for requiring contributions through the mechanism of S.106 obligations or CIL payments for Police infrastructure. It is submitted that it is imperative that, in order to achieve the national policy objective of promoting safe and secure communities within the hub development area, as the overarching policy relating to this critical site, Policy P1 should expressly identify social infrastructure, including that required for policing, as a key objective.
125. The failure to identify social infrastructure in paragraph 3 of Policy P1 is contrary to national policy. It is contended that Policy P1 is **unsound**. The omission of an express reference to Police infrastructure, as a relevant consideration in the context of the overarching policy relating to the hub development, means that there is no clear policy for this type of infrastructure in the SLP.
126. Further, Policy P1 paragraph 3, fails to identify the importance of 'Secured by Design' standards, which promote safe and secure places so that crime and the fear of crime will be reduced. As highlighted above, updated guidance in the PPG emphasises the relevance of safety and security issues in the design of new developments, particularly where significant numbers of people will be attracted. Given the size and nature of the development proposed at the hub, consideration of security measures should be a significant objective specifically addressed by

Policy P1. In the absence of any reference to safety or security in paragraph 3 of Policy P1, it is contended that the policy is inconsistent with national policy and is **unsound**.

127. Policy P1 also fails to address the issue of the evening economy, in terms of safety and security issues. Given the nature and scale of the development proposed for the hub area, and it is contended that this is a significant policy omission and Policy P1 is thereby inconsistent with national policy and therefore **unsound**.
128. The absence of positive references within Policy P1 to the need for social infrastructure including for policing, or to promote safety and security in the design of the development, particularly in the context of the evening economy, undermines the effectiveness of the overarching policy relating to the significant scale of development proposed at the hub and is therefore, **unsound**.
129. It is submitted that 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 planned growth. The absence of positive references within the Local Plan to the need to provide Police infrastructure undermines the delivery of safe and secure development.
130. The recognition in the HFP 2018 of the need to provide for additional social infrastructure, including that required for policing, does not address the fact that the policies of the SLP Draft Submission Plan omit reference to this important type of infrastructure. The HFP is a document which will evolve and will be subject to change during the lifetime of the SLP. Accordingly, the priorities identified within it may be subject to change. It is important that there should be consistency between the HFP and the SLP. There should be a clear policy mechanism in the SLP for achieving what the HFP states in terms of securing Police infrastructure contributions for this nationally important development proposed in this location. Policy P1 should therefore make explicit reference to the need for Police infrastructure contributions. In terms of design objectives, there should be specific references to the need to comply with 'Secured by Design' standards to ensure that the proposals are safe and secure, minimising the risk of crime and the fear of crime. In addition, reference should be made to the need to take account of safety considerations relating to the evening economy. Without such references, it is contended that the policy is manifestly inconsistent with national policy and is **unsound**.

Infrastructure and Implementation

131. On behalf of the CCWMP it is formally requested 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, 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

132. 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.

133. In accordance with national planning policy, the theme of community safety and crime prevention should be given the appropriate 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.
134. 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.
135. The Solihull Local Plan Draft Submission Plan 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.
136. The detailed justification for S.106/CIL contributions relating to Police infrastructure is set out in the representation on behalf of CCWMP in relation to Policy P21 and remains relevant in the context of the consideration of the issues relating to Policy P1.
137. In terms of Policy P1, 'UK Central Solihull Hub Area', it is contended that paragraph 3 should make express reference to the fact that developments should provide for social infrastructure including Police infrastructure. In addition, paragraph 3 should specify the need to achieve high quality design by adhering to 'Secured by Design' standards to promote safe and secure environments and should make reference to the need to ensure that in the context of the evening economy, facilities are provided in a safe and secure manner.
138. Paragraph 82 of the supporting explanatory paragraphs to Policy P1 should reflect that the modifications sought to paragraph 3 of Policy P1 as set out above.
139. Without the suggested modifications it is submitted that Policy P1, as worded in the Draft Submission Plan, is inconsistent with paragraphs 20 b) and 34 of the NNPF and **is unsound**.
140. In addition, it is formally requested that the Police are actively engaged with on an on-going basis in the future reviews of the hub Framework Plan that may be required to guide development to ensure that the evolving needs of policing are kept up-to-date and are taken into consideration.
141. Further, it is formally requested 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, SPDs and policy implementation.

Enclosures

- Enclosure 1: Solihull Local Plan Review Letter of Representation dated 14th December 2016
- Enclosure 2: Solihull Local Plan Review letter of representation dated 15 March 2019

(End)



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

142. On behalf of the CCWMP the following modifications are proposed to Policy P1 paragraph 3 and the supporting text (additions in bold):

'Policy P1 UK Central Solihull Hub Area

3. *Development proposals within the hub will be expected to demonstrate how they achieve the following key objectives*
 - i. *Contribute towards sustainable and inclusive economic growth, the continued success of the key economic assets, and Solihull's attractiveness to investment in high value-added activities, including low carbon technologies and services;*
 - ii. *Maximise connectivity within and beyond the site through the integrated movement and transport networks (including sustainable and active modes of travel), capitalising on the infrastructure advantages of the location with its major new transport hub; Contribute to and co-ordinate transport, energy, power and digital infrastructure provision;*
 - iii. *Do not impede the provision of infrastructure necessary to support development elsewhere in the hub Area, or otherwise prevent or hinder development occurring in other parts of the hub Area;*
 - iv. *Encourages the use of modes of travel other than the private car;*
 - v. *Deliver a high quality strategic green and blue infrastructure network across the hub Area to enhance natural assets;*
 - vi. *Create distinct and unique places which **are safe** with a strong sense of identity, incorporating high quality design **which meets 'Secured by Design' standards to reduce crime and the fear of crime**, innovation for development and the public realm, whilst maximising the efficient use of land;*
 - vii. *Support inclusive economic growth by supporting employment and supply chain opportunities that benefit businesses and residents across the Borough and by supporting vibrant and sustainable communities, with an emphasis on health and wellbeing, including those working, living in and visiting the hub area; and*

- viii. *Encompasses sustainability principles minimising the use of natural resources and incorporating low (zero) carbon and renewable energy principles;*
- ix. ***Provide for contributions towards measures to mitigate the impact of development and make it acceptable in planning terms by providing for physical, social, green and digital infrastructure as identified in Policy P21, the Infrastructure Delivery Plan and the hub Framework Plan;***
- x. ***Maximise partnership working with infrastructure providers, including those identified in the Infrastructure Delivery Plan in particular, in relation to issues of security and safety;***
- xi. ***Support the evening economy by providing facilities in such a way as to ensure safe, secure, accessible and inclusive environments so that crime, the fear of crime and anti-social behaviour are minimised.'***

143. In terms of the supporting text, the following modifications are sought (additions in bold):

Paragraph 82:

*'The Policy sets out the key objectives that development will be expected to contribute towards, including sustainable and economic growth **and the need for development to achieve 'Secured by Design' standards to promote safe and secure environments, the provision of necessary infrastructure, including social infrastructure and ensuring that in terms of the evening economy, facilities are secure, inclusive and accessible.** Growth that is inclusive should demonstrate that the benefits will accrue to all by building on the strengths of communities, ensuring that wealth is more evenly spread and enabling everyone to contribute and participate.'*

(End)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To address the Council's Responses and the Inspector's Matters, Issues and Questions.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Glenda Parkes

Date:

11/12/2020