



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	Mrs
First Name	Glenda
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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="checked" type="checkbox" value="X"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox" value="X"/>	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)

Policy P2 Maintain strong, Competitive Town Centres

Paragraphs 113 to 140 paragraphs regarding Solihull TC

1. **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. Policy P2 'Maintain Strong, Competitive Town Centres is unsound on the basis that it is contended that given the scale and type of development proposed in Solihull Town Centre, 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 Draft Solihull Town Centre Masterplan (TCM) 2020. The omission of an explicit reference to the need for financial contributions for Police infrastructure in the overarching Town Centres policy of the Plan or in its supporting text, renders the policy ineffective and inconsistent with national policy and therefore is unsound.**
2. **Policy P2 and its supporting text omits any reference to the fact that development proposals within Solihull Town Centre 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 area. It is contended that without such references, Policy P2 and its supporting text as worded is ineffective and inconsistent with national policy and therefore is unsound.

3. **It is submitted that the omission of a reference to the evening economy within the wording of Policy P2 renders the policy inconsistent with national policy and, therefore, is unsound.**
4. On behalf of the 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 which the proposed changes, remain pertinent to the plan making process.

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

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 letter of representation made on behalf of the CCWMP, relates to whether specific policies in the plan are sound.

Policy P2 Maintain strong, Competitive Town Centres

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 Draft Submission Plan, in particular in relation to Policy P2 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 P2, it is contended that given the scale and type of development proposed in Solihull Town Centre, 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 Cabinet approved 2020 Solihull Town Centre Masterplan (STCMP). The omission of an explicit reference to the need for financial contributions for Police infrastructure in the overarching Town Centres policy of the Plan or in its supporting text, renders the policy **ineffective and inconsistent with national policy and therefore not sound.**
14. Policy P2 and its supporting text omits any reference to the fact that development proposals within Solihull Town Centre 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 area. It is submitted that without such references, Policy P2 and its supporting text as worded is **ineffective and inconsistent with national policy and therefore not sound.**
15. It is submitted that the omission of a reference to the evening economy within the wording of Policy P2 renders the policy **inconsistent with national policy and therefore not sound.**
16. The Police should be actively engaged on an on-going basis in the future reviews of the masterplans relating to Solihull Town Centre 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 P2
 - c) Is Policy P2 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-terrorist 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 inclusion of Police infrastructure in the Draft IDP (Section 4.4 pages 87-88) and the accompanying IDP Schedule (Appendix A of the IDP) is supported and welcomed; as 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, that 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 also 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).

Solihull Town Centre Masterplan 2016

68. The Solihull Town Centre Masterplan (STCMP) 2016 forms part of the evidence base supporting the Solihull Local Plan Review.

69. The STCM refers to 'Framework Concepts', identified as 'Connections', 'Living and Working' and 'Experience', which provide inter alia, that diversification is a central aim of the redevelopment proposed in Solihull Town Centre, by introducing more residential uses into the Town Centre and by enhancing the Town's evening and leisure offer, through high quality development proposals.
70. In terms of key interventions proposed by the STCMP, the relocation of Solihull Station and redevelopment of the existing site was central to the concept proposals.
71. A number of opportunity sites were identified in the STCMP 2016 to realise the vision (section 6.9-6.15) for the relocation of the station and transport interchange; up to 1,217 new homes within Solihull Town Centre with 100 plus additional houses on the station site; up to 541, 188 sq ft /50,278 sq m of new office development and up to 235,623 sq ft/21,890 sq m of new commercial and leisure development.
72. The STCMP identifies a number of locations for redevelopment to realise the vision. A Business and Commercial area, incorporating Homer Road, is included for residential and employment development. Solihull Police Station and the Magistrates Court are shown as the site for up to 226 homes and basement car parking. The 2016 STCMP acknowledged that the Police Station remains in use, but that as the Masterplan spans 20 years and beyond, it assumes that the fitness for purpose of these buildings may be reviewed in the future. Whilst noting the proposals of the Masterplan, it is submitted, on behalf of our client, that further engagement will be required on the Town Centre Masterplan around the WMPCC requirement to maintain a Police presence and Public Contact office in the Town Centre in the long term.
73. A key objective of the 2016 STCMP was to provide appropriate sites for residential development with a view to increasing the resident population of the town centre, in order to diversify its economy, particularly the 'evening economy'.
74. Section 6.20 (page 106) of the 2016 STCMP deals with safety and security as part of the design process and highlights the importance of developing sites and spaces in order to make people using them feel safe, identifying key issues to promote safety. Paragraph 6.20.1 highlights the need to take into account the integration of Counter Terrorism Measures in the design process. In addition, Section 7.1 'Key Framework Principles' highlights inter alia, the importance of safety (page 112).

The Solihull Town Centre Masterplan 2020

75. The STCMP 2016 has been updated and the 2020 Solihull Town Centre Masterplan (STCMP) was approved for adoption by the Council's Cabinet on 5th November 2020. This suggests that it provides supporting evidence and is the final Solihull Town Centre Masterplan, which builds upon previous visioning work established through the Town Centre Study (2009) and other strategies (page 6 paragraph 2.1).
76. The Cabinet approved 2020 STCMP aims to provide a framework for future investment and development, which maximises the opportunities for Solihull, capitalises on its existing assets and sets out a clear vision for Solihull to 2036 as a thriving, vibrant, visionary town. It confirms that the 2016 STCMP has been updated to incorporate strategic decisions, local, regional and national policy and trends.
77. Section 3.7 (page 22) of the Cabinet approved 2020 STCMP 'Key Opportunities and Constraints' suggests that one of the weaknesses identified is the limited residential offer in Solihull Town Centre. To address this issue, the Masterplan identifies

concepts in section 5, one of which is the 'Living and Working', which seeks to diversify the Town Centre by introducing more residential uses (up to 1,178 new homes) and further office uses (50,000 sq m floorspace) and retail, leisure and active ground floor space (40,000 sq m) into the town centre to inject new vitality through a mixture of activities, economic relationships, times of use and built form. By encouraging residential uses in Solihull Town Centre, it is considered that a mixed use residential and commercial environment will encourage activity in the town centres beyond retail trading hours and help open the market to the evening economy and leisure opportunities.

78. In relation to the 'Experience' Concept the Cabinet approved 2020 STCMP emphasises that new opportunities will be sought to enhance the town centre's evening, leisure, arts and culture offer to create a town centre where people can choose to live, work and spend their leisure time, in order to encourage activity beyond retail trading hours and strengthen the market for evening and leisure opportunities.
79. At section 6, the Cabinet approved 2020 STCMP sets out the preferred framework and illustrative masterplan for the town centre. The Masterplan looks to create a broader mixture of land uses across different areas of the town centre, which blend together and create a positive and distinct identity whilst ensuring that the existing character of Solihull is preserved and strengthened.
80. Section 6.8 of the Cabinet approved 2020 STCMP identifies the Areas of Change, within which the 'Vision' confirms that existing buildings will be replaced to create new urban living opportunities, forming vibrant mixed use areas which will help to diversify the town centre economy.
81. One of the areas of change relates to the Business Commercial area situated between Homer Road and Touchwood Shopping Centre, including the Police Station site. The site is identified as having the potential to accommodate circa 200,000 sq ft office floor space, 65 residential units and 200,000 sq ft active ground floor use. These areas of change are noted and on behalf of our client, it is submitted that Whilst noting the proposals of the Masterplan, it is submitted, on behalf of our client, that further engagement will be required on the Town Centre Masterplan around the WMPCC requirement to maintain a Police presence and Public Contact office in the Town Centre in the long term.
82. The 'Design Objectives' set out in the Cabinet approved 2020 STCMP (page 68), highlight the overarching design objectives relating to proposals identified in the Masterplan. A key objective relates to safety issues. The 2020 STCMP confirms that new development and the design of the public realm will need to ensure that that the town centre feels safe and usable at all times of the day. The design of the streets and public spaces need to be active, well-lit and overlooked. As part of the social and environmental benefits of the proposals for the town centre, the Masterplan recognises the need to enhance the sense of safety and security (page 68).
83. Section 7.3 of the Cabinet approved 2020 STCMP (page 73) sets out the safety and security strategy, which highlights the importance of integrating Counter Terrorism Measures into the design. There is also reference to a parking strategy and the 'Key Framework Principles' (page 78-79) emphasise the need to give careful consideration to the layout and orientation of buildings to provide natural surveillance. In addition, management and maintenance should be kept to a high standard to encourage respectfulness, civic pride and to deal with vandalism. Appropriate use of CCTV to enhance safety without infringing privacy is

recommended. The Cabinet approved 2020 STCMP does not however, refer to 'Secured by Design' standards or 'Park Mark'.

b) Justification for Police Infrastructure provision and emphasis on safety and security considerations within Policy P2

84. The detailed justification for contributions towards Police infrastructure provision is set out in our letter of 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 that letter are relevant to the consideration of the need for a reference to S.106/CIL contributions for Police infrastructure in the context of Policy P2 and should be taken into consideration.
85. As is set out in the representations 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. However, it is maintained 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 P2, for the following reasons.
86. 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.
87. 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. That outcome would be contrary to national policy.
88. With significant levels of development growth, including that proposed in Solihull Town Centre, the demands placed on the police service will increase as the local population and mix of uses changes, particularly in terms of enhancements to the evening economy. 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 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 and enjoy leisure and cultural pursuits in a safe environment and will need to be reassured that the Police can operate efficiently and effectively in the area.
89. 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.

90. This is particularly relevant in the context of Policy P2. The SLP Draft Submission Plan expressly recognises in paragraph 113 that Solihull Town Centre is strategically important in the West Midlands and the principal focus of community, civic and business activity in the Borough.
91. Paragraph 3 of policy P2 refers to the principles in the TCM which emphasise the aim to diversify the Town Centre through the introduction of new commercial and residential uses and to broaden the mix of land uses to attract more people throughout the day. Paragraph 123 of the supporting text to Policy P2 reinforces this aim to broaden the town centre uses by identifying the types of uses envisaged.
92. The objectives set out in paragraph 3 of Policy P2 are supported, but it is contended that Policy P2 is inconsistent with paragraphs 20 b) and 34 of the NPPF as there is no reference to the need to provide for social infrastructure arising from the level of growth predicated in the 2016 draft STCMP.
93. Policy P2 paragraph 5 refers to the requirement for all development to make a reasonable and proportionate contribution to the cost of providing and maintaining necessary town centre infrastructure, including walking and cycling access, public transport, the public realm and on key highway links and junctions within and serving the town centre. There is no reference in Policy P2 to the need for contributions towards the costs of other types of infrastructure, including social infrastructure relating to the emergency services. This represents a significant policy omission in the light of the clear requirement in the NPPF paragraph 20 b) that strategic policies should make sufficient provision for security infrastructure. Notwithstanding the fact that Policy P21 of the SLP Draft Submission Plan relates to infrastructure, there should be specific reference to contributions to social infrastructure including that for policing, in Policy P2 which is the overarching policy relating to the Town Centre and the growth proposed within it.
94. It is an imperative that as the overarching policy relating to Solihull Town Centre, Policy P2 should be specific in terms of ensuring that it provides a comprehensive policy framework for development and associated infrastructure within the area. In accordance with paragraphs 20 b) and 34 of the NPPF, the wording of Policy P2 should recognise and include the requirement for social infrastructure, including that required for policing, as set out in the Draft IDP. As currently worded, Policy P2 is inconsistent with national policy.
95. In addition, paragraph 3 of Policy P2 states that the Town Centre Masterplan establishes a number of principles and according to paragraph 4, proposals which fulfil them, will be supported. Paragraph 3 vi highlights the value of good urban design and recognises the *'importance of creating legible, distinctive, flexible, attractive, safe and inclusive public realm throughout the town centre'* The requirement for high quality design and the reference to safe public realm is support, but it is submitted 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 within Solihull Town Centre, is a significant consideration.
96. 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.

97. 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.
98. In the context of Policy P2, given the scale and type of development envisaged, explicit reference should be made in paragraph 3 vi to security and safety issues as essential considerations in the design process. Development within Solihull Town Centre envisages large-scale mixed-use proposals including residential development and proposals which will attract significant numbers of people throughout the day and evening. As the Cabinet approved 2020 STCMP referred to above confirms, it is envisaged to introduce complementary mixed uses within Solihull Town Centre to broaden its appeal. It will become a destination with greater emphasis on entertainment, cultural and leisure facilities in addition to more residential development. Whilst the Cabinet approved 2020 STCMP refers to some relevant design issues concerning safety and security, these are not reflected in detail in Policy P2.
99. Paragraph 124 of the supporting text to Policy P2 refers to the expectation of '*High quality urban design*' to protect the character of town centre's historic heritage and to improve links between key features within it, rather than to promote safety and security.
100. In accordance with the guidance in the PPG, the nature and anticipated number of users attracted to Solihull Town Centre as a result of the proposed developments referred to in the Cabinet approved 2020 STCMP, warrants a proportionate emphasis on safety and security within Policy P2 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 within paragraph 3 vi. As worded, Policy P2 is inconsistent with national policy due to the omission of any detailed reference to safety and security issues.
101. Whilst it is accepted that Policy P15 sub-paragraphs vii and ix, of the SLP Draft Submission Plan relates to design considerations which highlight the need to take account of safety and security and 'Secured by Design' standards, Policy P2 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 Solihull Town Centre, there should be explicit reference to these considerations in Policy P2 to provide a bespoke, comprehensive policy framework to guide development within the town centre.
102. Further, PPG Paragraph 042: Ref ID: 61-042-20190315 provides that in terms of strategic plan-making, 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 P2. 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.

103. The Cabinet approved 2020 STCMP confirms that one of the aims of diversifying the uses within Solihull Town Centre through the proposed development, is to encourage activity in the area beyond retail trading hours and help open up the market to the evening economy and leisure opportunities. It is also likely that other elements of the Solihull Town Centre proposals will include arts and cultural entertainment venues, contributing to the evening economy.
104. Whilst paragraph 116 of the supporting text to Policy P2 highlights the fact that uses such as arts, culture, independent cinema, pop up events, live music and competitive socialising is to be encouraged to complement and support the residential and office offer across the day and night, the policy wording fails to address safety issues in the context of the evening economy and is accordingly, inconsistent with national policy.
105. It is submitted that that the evening economy raises particular safety and security issues that need to be highlighted in Policy P2 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.
106. 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).
107. It is essential that reference should be made in [Policy](#) P2 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 P2 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 P2 of the SLP Draft Submission Plan sound?

108. The recognition in the Draft Infrastructure Delivery Plan 2020 that development will be expected to provide for social infrastructure, including for the emergency services and policing is welcomed and supported, in its aim of supporting the needs associated with the needs of the growth proposed in the SLP Draft Submission Plan. However, as the IDP is part of the evidence base, 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 IDP), should be specified in Policy P2. As worded, Policy P2 is inconsistent with the IDP 2020. Policy P2 fails to refer to social infrastructure and as worded it is **unsound** , s it is not effective and is not consistent with national policy as set out in paragraphs 20 b) and 34 of the NPPF.
109. The Local Plan Review provides an opportunity to establish an appropriate policy framework for future development in Solihull Town Centre. Whilst the provision of other types of infrastructure are highlighted as important in paragraph 5 of Policy P2, there is no reference to social infrastructure in the Policy itself nor in the supporting explanatory text. Accordingly, insufficient policy weight has been given to the provision of essential Police infrastructure. As worded, Policy P2 is inconsistent with the evidence base supporting the plan in particular, the IDP 2020.
110. Paragraph 004 Reference ID: 23b-004-20190901 of the PPG states that policy

requirements for planning obligations should be **clear**.

111. 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 imperative that in order to achieve the national policy objective of promoting safe and secure communities within Solihull Town Centre, as the overarching policy relating to this strategically important site Policy P2 should expressly identify social infrastructure, including that required for policing, as a key objective.
112. The failure to identify social infrastructure in paragraph 5 of Policy P2 is contrary to national policy. It is submitted that Policy P2 is **not sound**. The omission of an express reference to Police infrastructure as a relevant consideration in the context of the overarching policy relating to Solihull Town Centre means that there is no clear policy for this type of infrastructure in the SLP.
113. Further, Policy P2 paragraph 3 vi, 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 within Solihull Town Centre, consideration of security measures should be a significant objective specifically addressed by Policy P2. In the absence of any reference to safety or security in paragraph 3 vi of Policy P2, the policy is inconsistent with national policy and is **unsound**.
114. Policy P2 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 Solihull Town Centre, this is a significant policy omission and Policy P2 is thereby inconsistent with national policy and, therefore, is **unsound**.
115. The absence of positive references within Policy P2 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 in Solihull Town Centre.
116. 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 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.
117. The recognition in the IDP 2020 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 IDP 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 IDP and the SLP. There should be a clear policy mechanism in the SLP for achieving what the IDP states in terms of securing Police infrastructure contributions for the type and scale of development proposed in this location in the DSTCM 2020. Policy P2 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' and 'Park Mark' 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, the policy is manifestly inconsistent with national policy and is, therefore, **unsound**.

Infrastructure and Implementation

118. 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 in the progression of the Town Centre Masterplan, to ensure that a Police presence can be maintained in the Town Centre and a Public Contact Office is achieved and to ensure that the evolving needs of policing are taken into consideration.
119. 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

120. 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.
121. In accordance with national planning policy, the theme of community safety and crime prevention should be 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.
122. 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.
123. 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.
124. The detailed justification for S.106/CIL contributions relating to Police infrastructure is set out in the letter of 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 P2.
125. In terms of Policy P2, 'Maintain Strong, Competitive Town Centres', it is submitted 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' and 'Park Mark' 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.

126. Paragraph 124 of the supporting explanatory paragraphs to Policy P2 should reflect that the modifications sought to paragraph 3 of Policy P2 as set out above.
127. Without the suggested modifications, Policy P2 as worded in the Draft Submission Plan, is inconsistent with paragraphs 20 b) and 34 of the NNPF and **is not sound**.
128. In addition, it is formally requested that the Police are actively engaged with on an on-going basis in the progression of the Solihull Town Centre Masterplan that may be required to guide development to ensure that a Police presence can be maintained in the Town Centre and a Public Contact Office is achieved and to ensure that the evolving needs of policing are taken into consideration.
129. Further, it is 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, SPDs and policy implementation.

Enclosures

- Enclosure 1: Solihull Local Plan Review letter of representation dated 14th of 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.

130. The following modifications to Policy P2 paragraph 3 and the supporting text are sought (additions in bold):

'Policy P2 Maintain Strong, Competitive Town Centres

Solihull Town Centre
.....

3. *The Town centre Masterplan establishes a number of principles:*

- i. *The desire to diversify Solihull Town Centre through the introduction of new commercial and residential uses to attract more people throughout the day and to meet the changing demands of town centres. To create a broader mixture of land uses, across different areas of the town centre, which blend together and create a positive and distinct identity whilst ensuring that the existing character of Solihull is preserved and strengthened.*

- ii. *The desire to strengthen connectivity by providing improved routes for pedestrians, cyclists and public transport that are high quality, legible and safe...*
- iii. *The need to develop a multi-modal Integrated Transport Hub at the site of the current train station in Solihull...*
- iv. *The need to ensure that the provision of parking in the town centre meets the needs of retailers and businesses, whilst not acting as a constraint to development or mode shift **and which meets 'Park Mark' standards.***
- v. *The need to mark the town's gateways through the creation of unique landmark buildings...*
- vi. *The value of good urban design and green infrastructure for the town centre **which meets 'Secured by Design' standards to reduce crime and the fear of crime,** and the importance of creating legible, distinctive, flexible, attractive, safe and inclusive public realm throughout the town centre.*
- vii. *Opportunity sites which might accommodate significant additional growth and improvements to the connectivity of the town centre.*
- viii. ***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.'***
- ix. ***Maximise partnership working with infrastructure providers, including those identified in the Infrastructure Delivery Plan in particular, in relation to issues of security and safety;***
- x. ***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, and the Infrastructure Delivery Plan.'***

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

Paragraph 124:

*'High quality urban design will therefore be expected to ensure that development will protect the character of the Centre's historic heritage, improve public realm and improve pedestrian movement around the centre, for example to improve links to the Centre's parks and provide improved articulation between Touchwood and nearby open spaces and improve the pedestrian link between Mell Square and the Warwick Road Morrison's store which has poor public realm. Design principles that developers will be expected to follow are identified in the policy. **All development should meet 'Secured by Design' and 'Park Mark' standards to promote safety and security in the town centre, minimising crime, the fear of crime and anti-social behaviour. This is particularly relevant in terms of facilities and services relating to the evening economy, which should be designed to create safe, secure, accessible and inclusive places.'***

(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