

Planning Policy
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

Our Ref: P/H Div/0019/20

07 August 2020

Dear Sir or Madam

Bishop's Tachbrook Neighbourhood Development Plan – Regulation 16 Public Consultation

Place Partnership Limited (PPL) is instructed by Warwickshire Police (WP) to submit representations to the public consultation on the Bishop's Tachbrook Neighbourhood Development Plan (March 2020) (BTNDP).

The BTNDP, when 'made', will provide the planning framework for the Parish covering the next 10 years. Its policies will therefore be critical to ensuring that developments are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, as required by paragraphs 91 (b) and 127 (f) of the National Planning Policy Framework (February 2019) (NPPF).

Therefore the purpose of this response is to proposed amendments that will enable the BTNDP to promote design measures that will reduce crime, enable the delivery of infrastructure for new developments that will support the emergency services and ensure suitable access is provide for 'blue light' vehicles in the event of incidents.

It is in this positive and constructive spirit that WP would like to submit representations in relation to the following parts of the BTNDP:

3.0 Planning Policy Context – Page 19

As presently worded, the section on the 'Warwick District Planning Policy' only refers to landscape, heritage, and the natural environment. Whilst this helps to conserve the history and key views of the village, it does not help towards creating a sustainable and inclusive community through reducing crime. Therefore, the following amendment is suggested:

- ***Several planning policies dealing with landscape, heritage, the natural environment and the need for low-crime thriving communities.***

Inclusion of the above amendment would be in accordance with paragraph 91 (b) and 20 of the NPPF. It would also demonstrate that the BTNDP is in line with Objective C and Policy HS7 – 'Crime Prevention' of the Warwick District Local Plan 2011-2029 (adopted September 2017).

Neighbourhood Plan Objectives – Page 25

Whilst the Neighbourhood Plan objectives help to provide a plan for the village going forward, it would be beneficial to have an additional objective promoting a safe and crime free environment, which will help towards ensuring Bishop's Tachbrook continues to be a sustainable community. The following wording is suggested:

7. To promote a safe environment for existing and future residents by ensuring that new developments incorporate Secured by Design measures and where necessary, provision for emergency services infrastructure.

The inclusion of the above would be in accordance with paragraphs 91 (b) and 127 (f) of the NPPF and the following provisions in the Warwick District Local Plan 2011-2029 (adopted September 2017):

- Paragraph 2.7
- Policy SC0 – Sustainable Communities (part e)
- Policy BE1 – Layout and Design (part i)
- Policy HS1 – Healthy, Safe and Inclusive Communities (part c)
- Policy HS7 – Crime Prevention and its explanatory text (paras 5.91 – 5.93)
- Paragraph 5.74

By also incorporating Secured by Design (SBD) within the objective, it will ensure developers properly consider the principles involved in designing out crime and thereby deliver a sustainable community. Equally, emergency services infrastructure has been included as there remains a key role for them to play in both crime and disorder prevention, as well as protecting the public in response to 999 and 101 calls.

To give a brief summary of SBD, it is a long-running flagship initiative of the National Police Chiefs' Council (formally Association of Chief Police Officers). Its objective is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous public bodies (including Warwick District Council) and professional bodies. SBD is therefore a vital guidance resource for planners. SBD was created in 1989, is available online, regularly updated and consequently there is no danger of it ceasing to exist during the lifetime of the Neighbourhood Plan.

However, it should be noted that incorporating SBD will not reduce the need for additional emergency services infrastructure in relation to new developments. Paragraph 6.3 of Policy DM1 – *'Infrastructure Contributions'* in the Local Plan reiterates this point as new development places pressure on existing infrastructure, meaning that investment is key to ensuring cohesive communities for existing and future residents of the village. Moreover, there is no statutory power under which police, fire & rescue and ambulance services could be reduced because a given scheme incorporated SBD. This fact further underpins the requested amendment above.

Policy BT9 – Healthy and Inclusive Communities – Page 43

Whilst WP fully support the type of neighbourhood area envisaged by the policy, the reality is that it will not be possible unless that same neighbourhood is safe, secure and has access to the emergency services they need when required. This requires Secured by Design measures and emergency services infrastructure where necessary i.e. as per the points we have made in relation to other elements of the Neighbourhood Plan. In view of this, we recommend that the addition of the following to Policy BT9:

e. Promote a sustainable and safe parish for existing and future residents by ensuring that new developments incorporate Secured by Design and where necessary, provision for emergency services infrastructure.

The inclusion of the above would be in accordance with the following provisions in the Warwick District Local Plan 2011-2029 (adopted September 2017):

- Paragraph 2.7
- Policy SC0 – Sustainable Communities (part e)
- Policy BE1 – Layout and Design (part i)
- Policy HS1 – Healthy, Safe and Inclusive Communities (part c)
- Policy HS7 – Crime Prevention and its explanatory text (paras 5.91 – 5.93)
- Paragraph 5.74

The wording concerning emergency services infrastructure, specifically, is compliant with the NPPF. Paragraphs 8, 26, 32 and 92 together confirm that sustainable development means securing a safe environment through the delivery of social infrastructure needed by communities. In this respect, paragraph 20 specifically states policies should deliver development that makes sufficient provision for security infrastructure. Paragraphs 16, 26, 28, 32 and 38 collectively envisage this being delivered through joint working by all partners concerned with new developments.


The above policy requirements are included because the NPPF seeks environments where crime and disorder and the fear of crime do not undermine quality of life, the health of communities and community cohesion (paragraphs 91 and 127). Planning policies and decisions are expected to deliver this; an assertion confirmed by the appeal decisions summarised in **Appendix 1**.

Overall, WP wishes to emphasise that they welcome the opportunity to submit comments to the BTNDP and look forward to continuing this positive and constructive dialogue with the Council.

Should there be any queries about the response, please do not hesitate to contact us and we would be pleased to assist.

Yours faithfully

Emily Kingswell
Graduate Planner



“Without prejudice to any other obligation imposed upon it, it shall be the duty of each local authority to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area: Section 17(1) of the Crime and Disorder Act.”

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Appendix 1
Summary of Appeal Decisions