

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

Our Ref: P/H Div/0032/20

23 November 2020

Dear Sir or Madam

Burton Green Neighbourhood Development Plan – Regulation 16 Consultation

Place Partnership Limited (PPL) is instructed by Warwickshire Police (WP) to submit representations to the public consultation on the Burton Green Neighbourhood Development Plan 2019 – 2029 (BGNDP).

The BGNDP, 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 the quality of life or community cohesion, as required by paragraphs 91 (b) and 127 (f) of the National Planning Policy Framework (adopted February 2019) (NPPF).

Therefore the purpose of this response is to propose amendments that will enable the BGNDP 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 provided 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 BGNDP:

Paragraph 4.1 - Vision – Page 25

As presently worded, the ‘Vision’ does not mention the need to maintain low crime and anti-social behaviour levels in the Parish. Sustainable growth and community cohesion within the Parish is not possible without this, as confirmed by:

- Paragraphs 91 (b), 95, 127 (f) of the NPPF;
- Policies SC0 (e), BE1 (I), HS1 (c) and HS7 and Objective C of the Warwick District Local Plan 2011-2029 (adopted September 2017) (WDLP);
- Policy 4 (and its supporting text) of the BGNP.

Therefore, the following amendments to the Vision are suggested to resolve this:

4.1 Vision

*At the heart of the vision is the community cohesion of the Village so that residents, established, recent and future will live in a **place that promotes sustainable growth in a low crime and anti-social behaviour environment. The Village also responds to the climate emergency, is sensitive to the natural environment and ensures that residents are able to enjoy walking and cycling with access to community activities many of which are associated with the Village Hall and the village Primary School.***

Paragraph 4.2.3 – Strategic Objective 3: The Built Environment (SO3, Part c) – Page 26

Whilst WP support the BGNP in promoting sustainable development for the Parish, Part C of Strategic Objective 3 would be strengthened by advocating Secured by Design (SBD) to help promote crime free and safe environments as follows:

Strategic Objective 3: The Built Environment (SO3)

*c) To promote the organic and sustainable growth of the village. **This will deliver a low crime and safe environment through the incorporation of Secured by Design measures and where necessary, infrastructure for the emergency services.***

The inclusion of the above would in accordance with paragraph 91 (b), 124 and 127 (f) of the NPPF, Policy 4 (and its supporting text) of the BGNP and the following content of the WDLP:

- 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 advocating 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, the reference to emergency services infrastructure has been proposed as there is 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 4 – Community Aspects of Development and Design – Page 38

WP support paragraph 7.4.1 in promoting developers to plan positively to reduce crime and the fear of crime, which is supported by Policies BE1, HS1 and HS7 of the adopted Local Plan. However, the policy would be further strengthened by providing additional wording that specifically relates to SBD, obtaining free advice from WP's dedicated Design Out Crime Officers and emergency services infrastructure. Therefore, the wording below is proposed:

Policy 4 – Community Aspects of Development and Design

7.4.1 Development proposals will be expected to demonstrate how the design has planned positively to reduce crime and the fear of crime. This should be done through adopting Secured by Design guidance and the advice contained within Warwick District Council's Residential Design Guide (May 2018). Where necessary, infrastructure for the emergency services should also be included within proposed schemes.

Applicants can seek further information from Warwickshire Police's Design out Crime Officer about how to incorporate Secured by Design into their proposals.

Making the suggested amendments would be wholly 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.

This is expanded on by paragraph 95, which states planning policies and decisions should promote public safety and security requirements by using the most up-to-date information available from the police; who are essential local workers providing frontline services to the public, according to Annex 2 of the NPPF.

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).

Overall, WP wishes to emphasise that they welcome the opportunity to submit comments to the BGNBP and look forward to continuing the 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 the functions on, and the need to do all that is reasonably can, to prevent crime and disorder in its area: Section 17(1) of the Crime and Disorder Act.”