

Our ref: 8977 RDG SPD HW

City Centre Planning Team
Planning and Development
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

Emailed Only: citycentredevelopmentplanning@Birmingham.gov.uk

31st August 2022

Dear Sir/Madam

Jewellery Quarter Neighbourhood Plan Regulation 16 public consultation.

Formal Representations on behalf of the Chief Constable of West Midlands Police.

We act for the Chief Constable of West Midlands Police (CCWMP) and are instructed to make representations on planning policy 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;
- Recognising the importance of crime reduction and the need for development proposals to design out crime implementing Secured By Design standards, with timely and effective liaison with Design Out Crime officers;
- Requiring developers to demonstrate how proposals address community safety and crime prevention in Design & Access Statements, or other relevant planning application documents;
- Promoting a safe and secure entertainment, leisure and evening economy;
- Ensuring the timely and effective engagement of the police and other emergency services to ensure effective delivery of infrastructure projects required as a result of development growth with the recognition that the police are a social infrastructure delivery agency;
- In appropriate cases, seeking financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of development proposals and growth;
- Ensuring the timely and effective engagement of the police and other emergency services in the planning processes in relation to matters likely to affect crime and fear of crime; and

- Ensuring the timely and effective engagement of the police and other emergency services in relation to Counter-Terrorism matters. For example, Counter Terrorism Security Advisors can give appropriate advice concerning proactive security measures to help mitigate against the full range of terrorist attack methodologies.

Section 17 of the Crime and Disorder Act 1998 states, 'Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area'.

The CCWMP clearly has a statutory duty to secure the maintenance of an efficient and effective police force for its area and, of course, the Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime.

The CCWMP is therefore delighted that the Jewellery Quarter Neighbourhood Plan (NP) Regulation 16 consultation document has incorporated the spirit of representations submitted in response to the previous, draft version of the NP, dated 25th September 2020.

The CCWMP endorses the introduction of the 'Safety and Security' section 4.1 on page 71. The only amendments sought to this section are typos in paragraph 6 where 'Secure By Design' should be changed to 'Securedu by Design'.

The CCWMP also welcomes the following helpful references within the Draft NP:

1. POLICY 2(i): Meanwhile uses '*Development proposals for 'meanwhile uses' ... will be supported where they contribute to the vitality of the Jewellery Quarter, especially where it can be demonstrated that the use helps safeguard a building e.g. security through occupation, or providing essential maintenance. Parking is not an acceptable meanwhile use.*'
2. POLICY 3(a): Key Routes – '*active uses keeping streets busy and safe Development proposals along the Key Routes shown in Map 2 and listed below should add to the variety of uses in the vicinity and should incorporate active frontages at ground floor level...*'
3. POLICY 3(f): Development adjacent to the canal '*Development proposals in the Canalside Development Area shown on Map 6 should contribute to the recognition and improvement of the canal environment, including by...iii. Ensuring development does not 'turn its back' on the canal, allowing occupants visual amenity and providing natural surveillance while respecting the historic pattern of development around canals...*'
4. POLICY 4(b): Core design principles '*...Development proposals should have regard to the following design-related requirements... xiv. New development will create safe environments that design-out crime and design-in safety and security measures that promote positive social interaction and natural surveillance to reduce crime, fear of crime, and antisocial behaviour. Measures must be sensitive to their context and*

comply with other policies in the Neighbourhood Plan and the Conservation Area Character Appraisal and Management Plan...'

Conclusions

5. The CCWMP supports the inclusion of policies and proposals within the Jewellery Quarter NP which are in accordance with national planning policy and give the theme of community safety, security and crime prevention prominence. As drafted, the NP should help to promote sustainable communities where safety, reducing crime, fear of crime and anti-social behaviour, are prioritised.
6. The CCWMP welcomes the inclusion of the recommendation in section 4.1, that developers consult with West Midlands Police as the Design Out Crime Officers have extensive knowledge of security measures and 'Designing Out Crime'.

We should be grateful if you would acknowledge receipt of this letter of representation.

Yours faithfully,



Helen R Winkler Bsc(Hons) DipTP MRTPI
Associate Director
h.winkler@tyler-parkes.co.uk