

Our ref: 10700 BCCS I&O HW

Dudley Council
Council House
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Dudley
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Emailed Only: blackcountrycorestrategy@dudley.gov.uk

25th August 2017

Dear Sir/Madam

Black Country Core Strategy Issues and Options Report: 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 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 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 Vehicle-Borne Devices (VBD) mitigation and the Crowded Place agenda (particularly in relation to shopping areas and the night-time economy).

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 grateful for the opportunity to comment on the Black Country Core Strategy Issues and Options Report. Comments are set out below:

Infrastructure

1. The Issues and Options Report at paragraph 5.4 states that, '...The growth in development required across the Black Country up to 2036 will place pressure on existing physical, social and green infrastructure, and measures need to be in place to ensure that new growth is supported by appropriate and timely infrastructure provision so that vibrant and sustainable communities can be created and maintained. This will also create opportunities to provide infrastructure solutions to ease and remedy existing issues.' At paragraph 5.6 the Report accepts that '...infrastructure which requires significant up-front investment, such as new roads, or on-going service provision, such as schools, public transport and community services, may be more challenging to provide.'
2. The CCWMP welcomes the recognition in the Report that the scale of growth proposed will inevitably put pressure on existing infrastructure provision with a requirement to invest in additional infrastructure to serve the increased population. It is vital to ensure the necessary infrastructure is in place to deliver the growth objectives, including 'emergency services' infrastructure, as recognised in the Introduction and Scope of the Report.
3. The CCWMP formally requests that they be involved in the plan making process on an on-going basis to establish potential infrastructure pressure points and future infrastructure needs as more detailed information on preferred locations and the scale of growth likely in each location emerges.

Designing Out Crime

4. The CCWMP welcomes the recognition in Policy Area A – Health and Wellbeing section of the document, Theme 3 – ‘Designing for Safety and Wellbeing’ paragraph 6.12 that, ‘...Social exclusion can be reduced by effective design solutions which integrate well maintained public spaces, community facilities, shops and parks into the surrounding development. Well-designed places can also help to reduce the circumstances and opportunity for crime and increase public confidence and security...’
5. The CCWMP formally request that policies continue to be included in the Black Country Core Strategy review which require developments to meet Secured by Design Standards, as currently set out in adopted Policy ENV3 ‘Design Quality’ and supporting text paragraph 6.15 which identifies crime reduction as a key objective. It is important that appropriate policies are included in the Review document which seek to increase security, reduce crime and reduce the fear of crime.
6. Given the recognised importance of prioritising safety and security within national, local and emerging planning policies, the CCWMP considers it essential that the Black Country Core Strategy Review should include reference to the intention to work in partnership with the Police to promote safe and secure environments and communities to deliver the Plan’s objectives.
7. The local police Senior Leadership Team and Neighbourhood Policing Unit are likely to have detailed knowledge about site specific issues in respect of crime and safety and any needs arising from the proposed additional residential and employment land allocations in specific areas. Additionally, the centrally-based Design Out Crime Team (DOCT) have extensive knowledge of security measures and ‘Designing Out Crime’. The CCWMP requests that the Senior Leadership Team, Local Policing Unit and Design Out Crime Officers are engaged in policy implementation and delivery once the Black Country Core Strategy Review is adopted.

The CCWMP and his representatives would be pleased to meet with you to discuss the matters raised in this letter of representation.

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

Yours faithfully,



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