

From: [REDACTED]

To: [Planning Policy](#)

Subject: Coventry Local Plan Review 2021-2041 Publication (Regulation 19) Version: Representations made on behalf of the Police and Crime Commissioner for the West Midlands

Attachments: [Local Plan Regulation 19 Response Form - Policy AC6.pdf](#); [Local Plan Regulation 19 Response Form - Policy R6.pdf](#); [Local Plan Regulation 19 Response Form - Policy AC1.pdf](#); [Local Plan Regulation 19 Response Form - Policy DE1.pdf](#); [Local Plan Regulation 19 Response Form - Glossary.pdf](#); [Local Plan Regulation 19 Response Form - Policy H13.pdf](#); [Local Plan Regulation 19 Response Form - Policy H10.pdf](#); [Local Plan Regulation 19 Response Form - Policy AC4.pdf](#); [Local Plan Regulation 19 Response Form - Policy R5.pdf](#); [Local Plan Regulation 19 Response Form - Policy H11.pdf](#); [Local Plan Regulation 19 Response Form - Policy R2.pdf](#); [Local Plan Regulation 19 Response Form - Policy HE2.pdf](#); [Local Plan Regulation 19 Response Form - Policy AC5.pdf](#); [Local Plan Regulation 19 Response Form - Policy H7.pdf](#); [Local Plan Regulation 19 Response Form - Policy HW1.pdf](#); [Local Plan Regulation 19 Response Form - Policy CC1 \(Part A\).pdf](#); [Local Plan Regulation 19 Response Form - Part A \(AC\).pdf](#); [Local Plan Regulation 19 Response Form - Policy DS3.pdf](#);

Sent: 03/03/2025 13:22:22

Dear Sir/ Madam,

Please find attached completed Part A form and corresponding Part B representation forms on behalf of the Police and Crime Commissioner for the West Midlands in respect of policies AC1, AC4, AC5, AC6, DE1, DS3, H7, H10, H11, H13, HE3, HW1, R2, R5, R6 and the Glossary. I would be grateful if you would kindly acknowledge receipt of this email and the attached representations.

The Tyler Parkes Partnership Ltd acts for the Police and Crime Commissioner for the West Midlands (PCCWM) and is instructed to make representations on local development documents on behalf of West Midlands Police (WMP) in respect of securing appropriate policy reference in such documents to a range of 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 with 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, including in relation to Secured by Design and engagement with Design Out Crime Officers, as well as Park Mark; and
- Ensuring the timely and effective engagement of the police in relation to Counter Terrorism matters, e.g. Counter Terrorism Security Advisors can give appropriate advice concerning vehicle-borne Improvised Explosive Devices (VBD) and Person-Borne Improvised Explosive Devices (PBIED) mitigation and the Crowded Place agenda (particularly in relation to shopping areas and the night-time economy).

The PCCWM welcomes the opportunity to participate in the current consultation, and these representations build on those made previously, in particular to the Coventry Local Plan Review Issues and Options (Regulation 18) consultation in September 2023. These representations should be read in conjunction with those made previously.

At the outset, the PCCWM recognises that the Council has acknowledged his previous representations made at the Regulation 18 consultation stage; however some objections to the Regulation 19 plan do remain and these are set out in the attached representations. **As such, the PCCWM considers that the Coventry Local Plan Review 2021-2041 Publication (Regulation 19) Version is UNSOUND.**

The PCCWM looks forward to working pro-actively with the Council as the plan moves forward and would make the following introductory observations to supplement his representations.

INTRODUCTORY OBSERVATIONS

Incidents of crime are a characteristic of urban living, and it is an unfortunate fact that an increase in the resident population of an area is likely to see a consequential increase in the relative levels of crime taking place. Detailed, up-to-date, statistics on the levels and distribution of crime across the West Midlands area are available online. This data could provide a usual monitoring resource for the Council. It could also be used to provide a brief summary of the incidence of crime in the Profile of the Borough if that was considered appropriate.

To assist, however, the PCCWM provides the below figures based upon WMP data collection Office of National Statistics (ONS) household statistics, and which summarises levels of crime within Coventry for the last full calendar year, 2024:

Table: Crime Statistics from 2024 (full calendar year)

	Households	Calls for Service	Offences	Calls for service per household	Offences per household

West Midlands	1,178,413	761,314	313,065	0.65	0.27
Coventry	156,684	87,310	36,704	0.56	0.23

The proposals in the emerging local plan for the provision of 29,100 new dwellings (1,455 per annum) represent an increase of around 18.6% over the number of homes in the City. A consequential increase in population will inevitably result in an unfortunate increase in crime levels. Recent statistics show levels of offending in Coventry 45% higher than the national rate for England as a whole ([Coventry Crime and Safety Statistics | CrimeRate](#)).

It therefore follows that:

- The demands placed on the police service are likely to rise as the local population increases.
- The demands on the police are exacerbated by the major changes in the nature of crime and methods needed to deal with it, particularly regarding cyber-related crime and terrorism.
- Significant additional resources will be required to meet the Policing requirements from the rising population. This is likely to include not only start-up and training costs of new officers and support staff, but also supporting equipment and infrastructure.
- As Coventry's population increases, there is an urgent need to ensure that new development and growth is supported by adequate policing infrastructure, in the interest of creating sustainable communities.

Table: Predicted Crime Statistics

Existing Statistics for Coventry (2023)	-	Predicted additional incidents/offences based upon 29,100 new homes 18.6% increase
No. of Households	156,684	29,100
No. of Calls for service	87,310	16,240
No. of Offences	36,704	6,827

It is also widely appreciated that the careful design of new developments and works to the public realm can help reduce the amount of additional crime generated as the population grows by employing 'Secured by Design' principles. The adoption of 'Park Mark' principles can further act as a deterrence to crime. WMP wishes to work on a continuing basis with the Council and other stakeholders involved in the development process to ensure that Secured by Design principles are integral to new development and investment. To this end WMP employs dedicated Design Out Crime Officers whose role is to provide such advice to emerging developments on an ongoing basis.

The PCCWM 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 PCCWM requests that in accordance with national planning policy, the theme of community safety and crime prevention is given prominence in the Coventry Local Plan, with appropriate references being included as set out in the following detailed comments.

Additionally, and especially in and around the major facilities and infrastructure present in the city ensuring the timely and effective engagement of the Police in relation to Counter- Terrorism matters, e.g. Counter Terrorism Security Advisors, is crucial.

Kind regards

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