
Name or Organisation: Police & Crime Commissioner for West Midlands

3. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

4. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

In relation to Policy H13, the PCCWM made the following representation to the Regulation 18 consultation:

*"The PCCWM **supports** the principle of a Policy which supports Co-Living in Coventry and considers that there should be clear standards against which such applications are considered. These standards should include adequate provisions to design out crime.*

The policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained."

The justification for this is set out in the response of the PCCWM to Question 34 of the Issues and Options Consultation and applies equally to policies H7 and H10 and is repeated here for consistency, particularly as the Consultation Statement does not acknowledge this representation either:

"... Secured by Design (SBD) and Designing Out Crime (DOC) are the most sustainable and therefore the most cost-effective of all crime reduction interventions, with little or no evidence of displacement of crime and far more likely to lead to benefits to surrounding areas.

Over the past two decades, independent, academic assessments have demonstrated that developments which attain the Secured by Design (SBD) award maintain long term, sustainable reductions in recorded crime. The flagship project, 'The Four Towers' at Duddeston Manor in nearby Birmingham has maintained a 98.7% reduction (as based on the figures for 1988) in domestic burglary for over 20 years, whilst reductions in other property crime categories replicate the research findings of others. Policies which support the need for development to be SBD would accord with the requirements of the NPPF.

The 'broken windows theory' links disorder and incivility within a community to subsequent occurrences of serious crime. Any visible signs of crime and civil disorder, such as broken windows, vandalism, loitering, public drinking, and transportation fare evasion, can create an urban environment that promotes even more crime and disorder (Wilson & Kelling, 1982).

The PCCWM has evidence that where there is a lack of maintenance, this can quickly lead to a spiral of decline/neglect if not addressed quickly and effectively. The PCCWM believes the need to design out crime and ensure its continued maintenance in all new developments and redevelopments is a cornerstone to successful sustainable communities including Co-living. (PBSA & HMOs)

Examples of crime prevention initiatives of particular relevance to such developments include the need for:

- Adequate lighting for internal and external communal areas and access(es).*
- Doors into internal private spaces to be of external access door standard to provide safe and secure areas for individuals in their homes reducing opportunities for theft, intimidation, violence, disorder and fear of crime.*
- Controlled and regulated access into the properties, including into any separate buildings within the shared communal outdoor space to reduce the risk of unauthorised entry with associated opportunities for crime.*

Without such requirements, the PCCWM is concerned that Co-living, which the Issues and Options acknowledges is 'such a new model', may be an unsuccessful approach to providing housing that could help retain graduates in the City and deliver much needed homes for the younger generation, also to take the pressure off the number of HMOs coming forward.

It is suggested that all Co-living proposals should be expected to demonstrate how the relevant 'Secured by Design' standards principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.

Furthermore, it is considered that the specific Co-living policy should ensure that there is no over-concentration of Co-living units at the neighbourhood/street level, as affecting individual residents, to support a better balance and integration of Co-living occupancy within a residential area, reducing the potential for crime and disorder, and enhance community safety."

For these reasons, the PCCWM considers that further consideration should be given to his recommendations in the interests of reducing crime and the fear of crime accordingly and it is extremely disappointing that this has not been incorporated.

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained.

Policy H13 should therefore be amended by the inclusion of a clause such as:

'All proposals will be expected to demonstrate how the relevant 'Secured by Design' principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.'

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

N/A

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To address the Council's Responses and the Inspector's Matters, Issues and Questions, and to further assist the Inspector with regard the case made by PCCWM regarding Policy H13.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.