

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

Our Ref: P/H Div/0009/14

11 January 2019

Dear Sir or Madam

### **Land East of Kenilworth Development Brief – Warwickshire Police Representations**

On behalf of our client, Warwickshire Police (WP), we write in response to Warwick District Council's invitation to comment on the '*Land East of Kenilworth Development Brief*' (LEKDB).

WP welcome this opportunity to submit its view and help the Council as it refines the LEKDB. In this respect these representations should be viewed as the latest example of continuous positive engagement, with comments submitted to planning applications and previous development plan consultation being previous instances of this.

In the interests of brevity though, these representations only respond to those elements of the LEKDB that are directly relevant to the concerns and priorities of WP:

#### **Land East of Kenilworth Vision**

Whilst supporting the content of the Vision, WP would like to see a strong reference to the aspiration of ensuring that the new community created at the site is safe, secure and enjoys low levels of crime and anti-social behaviour. This would better tie the Vision to the following:

- Objective 6 and Chapter 10 of the LEKDB;
- Paragraphs 8(b), 91 (b), 95 (a) and 127 (f) of the National Planning Policy Framework (2018) (NPPF); and
- Issue 1.27(l) and Policies HS1 and HS7 of the Warwick District Local Plan 2011-2029 (adopted September 2017) (WDLP).

WP accordingly request that the following paragraph be added to the Vision:

*'The new community will be safe, secure and benefit from low levels of crime and anti-social behaviour. This will be achieved through a comprehensive package of design and infrastructure measures throughout the development.'*

### **Land East of Kenilworth Objectives**

WP welcome and support the proposed objectives for the new development, which are fully in accordance with the above paragraphs and policies of the NPPF and WDLP.

### **Development Principle 3C: Traffic Speeds**

WP welcome and support the proposed maximum traffic speeds within the development. This will help motorists to stay safe and reduce the risk of accidents, collisions and fatalities.

It should be remembered that over the past 3 years in Warwickshire 73 people have been killed and 557 seriously injured in collisions where speeding, or inappropriate speed, has been recorded as a contributory factor.

WP therefore consider that Development Principle 3C will be vital in ensuring that these types of statistics are not replicated in the new scheme.

### **Development Principle 7A: Placemaking Principles**

Whilst WP are pleased to see the inclusion of 'Safety and Security' as a placemaking principle and the promotion of Secured by Design (SBD), it is disappointing that the proposed text of the third bullet point effectively states that incorporating SBD will compromise the aesthetics of the development.

This is a misapprehension that the Police Service nationally has worked hard to overcome with commercial developers and other stakeholders. It is consequently unfortunate to see this reoccur in a draft planning policy document.

A review of the design guidance published by SBD on their website evidences the fact that it is a false assumption that a development can either adopt the design standards recommended or be aesthetically pleasing, but not both. Therefore, WP consider that the current wording of the bullet point is contrary to paragraphs 8(b), 91 (b), 95 (a) and 127 (f) of the NPPF (2018) and the following national planning practice guidance:

*'Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder...*

*Crime should not be seen as a standalone issue, to be addressed separately from other design considerations. That is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation.'*

Paragraph: 010 Reference ID: 26-010-20140306

Revision date: 06 03 2014

WP contend that if both cannot be achieved, that is the failure of the proposed design, not the SBD guidance. This point notwithstanding, WP do offer SBD advice free of charge via its dedicated team of Design Out Crime Officers, who are very willing to offer their professional expertise in the detailed application of SBD guidance within proposed schemes. In this case, the contact details of the relevant officer are:

Mr Ian King, Design Out Crime Officer, Warwickshire Police  
[REDACTED]

WP therefore request that the third bullet of the 'Safety and Security' placemaking principle be amended as follows to fully resolve this issue:

*'Aim to achieve Secured by Design accreditation throughout the development.'*

**Table 6: Infrastructure Requirements – Emergency Services**

The stated infrastructure requirements and indicative costs shown for WP are correct and reflect previous discussions with the Council about the site.

Overall, we trust that these representations will aid the Council in preparing the LEKDB. If it would be helpful for discussions to take place to discuss the points raised, we would welcome the opportunity to facilitate this.

Yours faithfully

**Andrew Morgan MRTPI**  
**Strategic Planning Manager**

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