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Planning Policy  
Shropshire Council  
Broseley Neighbourhood Plan  
PO BOX 4826  
Shrewsbury  
SY1 9LJ

Our Ref: P/F Div/0018/21

28 July 2021

Dear Sir or Madam

### **Regulation 15 Draft of the Broseley Neighbourhood Plan – Public Consultation**

Thank you for consulting West Mercia Police (WMP) on the Regulation 15 Draft of the Broseley Neighbourhood Plan 2020 - 2038 (DBNP).

The DBNP, when 'made', will provide the planning framework for the administrative area of Broseley Town Council up until 2038. It is therefore critical that its policies ensure developments are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, as required by paragraphs 92(b) and 130(f) of the National Planning Policy Framework (July 2021) (NPPF).

Therefore, the purpose of this response is to propose amendments that will enable the DBNP to promote measures that will reduce crime. It is in this positive and constructive spirit that WMP would like to submit representations to the following parts of the DBNP:

#### **Paragraph 4.9 – Community Vision for Broseley**

WMP supports Broseley Town Council's vision of supporting a safe place to live and vibrant community. We do though recommend that direct recognition is included that these will only be possible in a low crime area, which is recognised by the following:



- Paragraphs 8, 20, 35-37, 92(b), 97 and 130(f) of the NPPF:
- Policy CS6 and paragraph 4.79 of the Shropshire Core Strategy (adopted March 2011); and
- National Model Design Code (July 2021) – pages 31 (iv) and page 32 (iv).

In view of the above, WMP propose the following amendment to the Vision:

*'Our Vision is for a Broseley that is economically viable, **safe, secure and a low crime place to live, whilst supporting** a vibrant community in which every resident plays a part. We want to work with residents to preserve the Town's existing historical and semi-rural character while embracing the opportunities of the 21<sup>st</sup>. Century.'*

### **Plan Objectives – Paragraph 5.10**

WMP recommend that the Objectives make direct reference to Secured by Design and emergency services infrastructure, given that housing and economic development are highlighted as key priorities. This will help with promoting a low crime and safe environment for existing and future residents, whilst contributing to ensuring the emergency services do not become stretched. WMP therefore requests that the following is added to paragraph 5.10:

***c) The Plan will contribute to the delivery of Secured by Design and where necessary, emergency services infrastructure, as part of new development.***

The inclusion of this would be fully in accordance with the following:

- Paragraphs 8, 20, 35-37, 92(b), 96, 97, 126 and 130(f) of the NPPF:
- Policy CS6 and paragraph 4.79 of the Shropshire Core Strategy (adopted March 2011); and
- National Model Design Code (July 2021) – pages 31 (iv) and page 32 (iv).

To give a brief summary of Secured by Design (SBD), it is a long-running initiative of the National Police Chiefs' Council (formally Association of Chief Police Officers). Its objective is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous public bodies (including Shropshire Council) and professional bodies. SBD is therefore a vital guidance resource for planners. SBD was created in 1989, is available online, regularly updated and consequently there is no danger of it ceasing to exist during the lifetime of the Neighbourhood Plan.

It should though be highlighted that incorporating SBD will not though negate the need for additional emergency services infrastructure in relation to new developments. Not least because there is no statutory power under which police, fire & rescue and ambulance services could be reduced because of a given scheme incorporating SBD.

### **7.6 Design Principles**

Whilst WMP support the policies, the criteria does not refer to SBD, which will be important in maintaining a safe and cohesive community within Broseley. It should also be noted that applicants can gain free advice on implementing SBD within their proposals from WMP's Design Out Crime Officers.

Given the above, WMP suggest the following is added to the list of policy under this sub-section of the DBNP:

**7.17 Policy DS.11 Designing Out Crime**

*Design proposals will be expected to show they have taken reasonable steps to design out crime through the application of the principles and standards of Secured by Design.*

The inclusion of this would be in accordance with the following:

- Paragraphs 8, 20, 35-37, 92(b), 97 and 130(f) of the NPPF:
- Policy CS6 and paragraph 4.79 of the Shropshire Core Strategy (adopted March 2011); and
- National Model Design Code (July 2021) – pages 31 (iv) and page 32 (iv).

The following content of National Planning Practice Guidance also explains why strong planning policies concerning this issue are very important to have:

*‘Good design that considers security as an intrinsic part of a masterplan or individual development can help to achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience... Good design means a wide range of crimes from theft to terrorism are less likely to happen by making those crime more difficult.’*

Paragraph: 010                      Reference ID: 53-010-20190722  
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Overall, WMP wishes to emphasise that they welcome the opportunity to submit comments to the DBNP public consultation and look forward to continuing this positive constructive dialogue with the Town Council. Should there be any queries about this response, please do not hesitate to contact us and we would be pleased to assist.

Yours faithfully

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