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## Birmingham Development Plan 2031 Examination.

Hearing Statement made on behalf of the Police  
& Crime Commissioner for West Midlands  
(PCCWM).

Matter I: Transport & digital communications  
(BDP policies TP37- 45)

Our Ref: 8976. Matter I.  
Date: 10<sup>th</sup> October 2014



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## 1. Introduction

### Scope of this statement

- 1.1. This hearing/written statement is to be read in conjunction with the representation made on behalf of the Police and Crime Commissioner for West Midlands (PCCWM). This was made by letter to Birmingham City Council (BCC) in relation to the Birmingham Development Plan Pre-submission Consultation document (our ref: 8976 CL1 HRW). Examination refs reference: 195695.
- 1.2. Our further representations and comments are made in respect of the 'Inspector's issues and questions for discussion' set out in the document issued by the Examination Programme Officer in August 2014.
- 1.3. This document covers responses to the Inspector's questions relevant to the Police and Crime Commissioner for West Midlands (PCCWM) previous representations and concerns.
- 1.4. We also refer to any new and relevant matters that have arisen since our original representations submitted in March 2014.

## 2. Matter 1: Transport & digital communications (BDP policies TP37-45)

Main issue: Are the Plan's policies towards transport and digital communications justified and effective?

**Question: 2) Should the Plan include a policy requirement to consult the police over transport and connectivity proposals?**

**Response.**

- 2.1 Planning applications must be determined in accordance with the development plan unless there are material considerations that indicate otherwise. Thus in a plan-led system it is important to ensure the development plan policies are suitably worded such that they include aspects of national policy and guidance, and having regard to local circumstances and evidence. Indeed, without such considerations a development plan would be unsound.
- 2.2 Our original representation suggested an additional policy wording to require BCC to consult PCCWM in respect of transport and connectivity proposals. The intention is to ensure policing issues; including crime and the fear of crime are taken into account when proposals for transportation and connectivity developments are considered. PCCWM continue to hold this view.

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- 2.3 It is noted BCC does not propose any Main Modifications by way of any additional policy or amendment to the proposed to the wording of BDP policies TP37– 43.

### **Reasons.**

- 2.4 It is accepted that the proposed Development Plan will need to be read as a whole. It is noted Proposed Policy PG3 'Place making' states new development should 'create safe environments that design out crime...that promote positive social interaction and natural surveillance'.
- 2.5 Our representation sought a policy to require consultation with the police both at an early stage in the process and on an on-going basis to ensure any potential policing issues for particular areas or proposals can be taken fully into consideration. Examples would include; in respect of HS2 proposals and investment in extended/improved public transport and networks, or re-designated transportation routes. Whilst PCCWM recognise it has been consulted and included in a number of developments and changes to traffic routes etc. in Birmingham City, it is felt this practice ought be enshrined as a policy requirement so as to ensure long term consistency.

### **National Planning Policy Framework (NPPF).**

- 2.6 Paragraph 32 in effect requires developments that generate significant amounts of movement should be accompanied by a transport assessment. This should include what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.
- 2.7 This taken to include not only matters concerned with highway (and other transport links) safety for users of the development and associated transport links, but also matters concerning crime prevention and the fear of crime. To that end, we feel it is entirely appropriate and necessary for PCCWM to be included in influencing these matters through the consultation process.

### **Examples of practice in the PCCWM area.**

- 2.8 Set out below are a number of examples to illustrate the wide scope of issues that PCCWM has been involved with concerning transport and connectivity issues. They are provided to illustrate the importance of ensuring PCCWM is included in decisions that affect the city.

### **Transport and connectivity.**

- 2.9 The local transport authority (Centro) have a responsibility to provide transport to all communities across the West Midlands. They have a responsibility to provide an effective transport system that is accessible to all age-groups and communities. The transport systems should meet the economic and environmental needs of the region, as well as providing access to jobs, finding innovative ways to help reduce congestion and offering seamless connections for people and goods to home and overseas markets.
- 2.10 It is important that PCCWM is consulted about transport routes, to ensure that crime and fear of crime is minimised. This should include new bus and train stations and other transport hubs. The siting of bus shelters is vitally important, as is the design, style and materials used. Passengers awaiting their bus should be able to feel safe and be visible (as well as being able to shelter from the elements). The siting of bus shelters is important to ensure they are placed in the most appropriate locations for the local community (to prevent people taking shortcuts through poorly-lit areas) and the shelter should be well-lit (so people feel safe while waiting for the bus during the hours of darkness).

### **Cycling and Walking.**

- 2.11 Cycle and pedestrian routes, including routes between transport hubs, are vitally important to a vibrant, inclusive community, and even more so when a large-scale development is being planned. For example, when a bus route is diverted or major roadworks have resulted in a road closure. People need access to transport routes/work/home. PCCWM consult with Centro (transport authority) regarding sustainable travel options including cycle routes, cycle storage, maintenance, safe-cycling courses and security marking. PCCWM is also consulted by Centro regarding the promotion of safe walking-routes and to consider which journeys people could safely make on foot.
- 2.12 Birmingham City Council is actively promoting the cycling agenda and recent consultation examples have included a number of cycle routes across Birmingham, (and the six other Local Authorities). If consulted, PCCWM is able to for example, recommend the lighting options and their positions on canal towpaths, which have historically been robbery hotspot, and pedestrian routes through new-build estates.

### **Park Mark.**

- 2.13 The Park Mark® Safer Parking Scheme is an initiative of the Association of Chief Police Officers and is aimed at reducing both crime and the fear of crime in parking facilities.
- 2.14 PCCWM actively encourage the use of Park Mark car parks, and during large-scale developments, the developer/applicant is encouraged to seek to achieve the Park Mark standards for parking facilities. The Park Mark accreditation is awarded for areas such as design, layout, cleanliness, access control, CCTV, fencing, safety and security.

### **Speed Limits.**

- 2.15 PCCWM has recently had opportunity to consult on the BCC '20 is plenty' proposals, to reduce most of Birmingham's roads to 20mph speed limit. Matters of concern include;

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resultant likely impact of survival rates in event of a pedestrian /car collision, enforcement of reduced speed zones, emergency incidents, carbon output.

### **Major Developments.**

2.16 PCCWM is regularly consulted on major developments/schemes, e.g. High Speed Two, Paradise Forum, Birmingham Mobility Action Plan, Metro Expansion, Snow Hill 1, Snow Hill 2 and many others. All of these large-scale developments have a major impact on both 'Transport' and 'Connectivity'. From a connectivity point of view, if roads are closed for months (and often years) during the build phase, it is important for PCCWM to consider how emergency service vehicles will navigate their route through the city to reach the destination and subsequent person in need. Consideration needs to be given to other legislation (e.g., Health and Safety, Corporate Manslaughter Act and others). For example if a road is closed without there being a suitable alternative route for emergency vehicles, this may put lives at risk.

### **Safety of Plant Material (secure storage).**

2.17 During large-scale developments, PCCWM can offer advice regarding the safe storage of plant machinery (e.g., JCBs, boom-arm JCBs, diggers etc). If the machinery is left at the side of the road it will become a target for thieves. Plant material is often stolen and shipped abroad, or used to commit other crimes (e.g., stolen JCB used to rip an ATM out of a wall at a bank or shop).

### **Creation of new bus only lanes.**

2.18 Many of Birmingham's roads in the City centre have been converted into 'Bus only', where bus lane cameras have been fitted. With all of the roadworks across the city, people are often diverted into those controlled-zone roads without realizing. This can result in a ticket for breaching the local road traffic regulations.

## **3. Conclusion /Proposed changes to the Connectivity Section of BDP.**

3.1 The PCCWM therefore request that BDP includes a proposed policy that ensures PCCWM be consulted on matters concerning transportation and connectivity, both at the outset of development proposals and on-going. The intention is to ensure policing issues including crime and the fear of crime are taken into account.