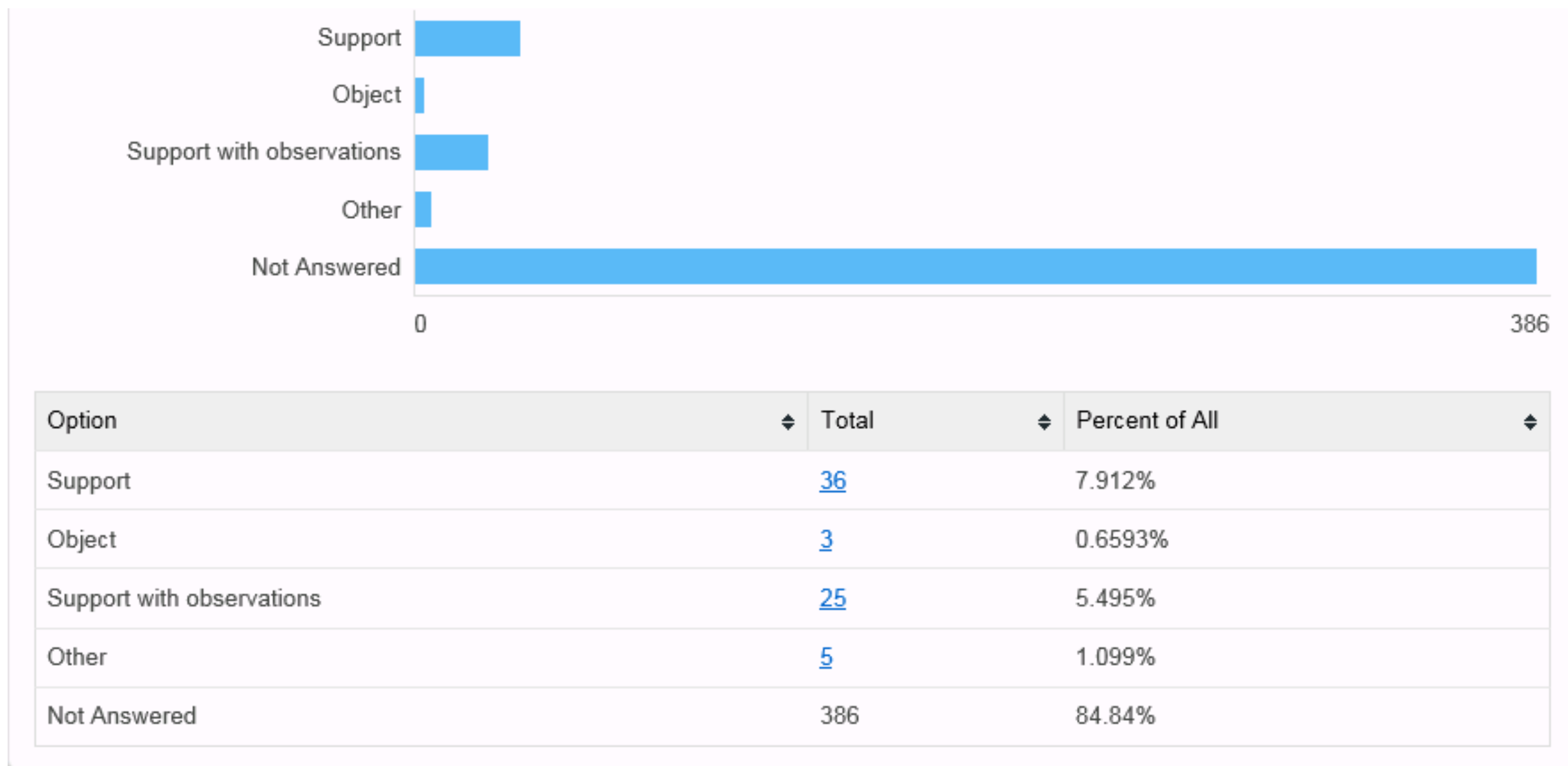


Policy IN2 – Infrastructure Contributions



Chapter 8: Managing the Delivery of Development – Policy IN2 – Infrastructure Contributions

Name	User ID	Support/ Object	Comment or Issue	What changes would you like to see made to this policy?	Officer Response	Proposed Amendment
Robert Ian Lockey	ANON-BHRP-4H3G-2	Object	Developers should obtain written confirmation from utility undertakings that they can supply necessary services and facilities to proposed developments. If enhancements are necessary they can pay the undertaking directly. The Council only needs a levy for Council-provided services. A levy for affordable housing can only make other housing less affordable. Who takes the levy, who controls it, and who receives the receipts?	Developers should obtain written confirmation from utility undertakings that they can supply necessary services and facilities to proposed developments.	The Council is working with the utility providers and developers to determine additional infrastructure requirements. The Council is undertaking evidence gathering for a CIL Charging Schedule which will determine which items of infrastructure will be provided through CIL. Affordable Housing will not be funded through CIL. The Council sets and collects the CIL receipts.	
Angus Smith	ANON-BHRP-4HZK-D	Support with observations	If viewing this Policy what is IDP - please do not use acronyms on a policy without identifying what that Acronym is within that policy at least once. Make it easier for outsiders to understand - creates less problem in the future for yourselves in guessing what it means.	As Above	Infrastructure Delivery Plan.	Policy to state "Infrastructure Delivery Plan".
John David Smith	ANON-BHRP-4H4X-M	Support	Misspelling of 'provision' in point 1.	None.	"Provision" is spelt correctly.	
Mr John Brown	ANON-BHRP-4H4Z-P	Support with observations	Wildlife, environment and surrounding communities must be considered at ALL TIMES.	See above.	Noted.	
John Mace	ANON-BHRP-4HEM-T	Support with observations	Agree providing infrastructure development is in tandem with other development and not subsequent.		Infrastructure will be delivered alongside new development.	
Mr Herbert Daybell	ANON-BHRP-4HEA-E	Support with observations	Will this be covered by a CIL charging schedule? If not, there should be a minimum number of units before this requirement kicks in, such as 10 units.	See above.	The Council is undertaking evidence gathering for a CIL Charging Schedule which will determine which items of infrastructure will be provided through CIL	
Persimmon Homes	ANON-BHRP-4HF3-1	Support with observations	Again, changes in CIL regs on S106 restrict pooled contributions. Capturing funding from development that provides housing or employment through CIL would help expedite proceedings, reduce delays attributed to S106 negotiation and provide assurance everyone pays their fair share.		The adoption of a CIL Charging Schedule is a priority for the Council	

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Elizabeth Anne Taylor	ANON-BHRP-4HMD-S	Support with observations	Developments so often go ahead and developers fail to deliver promises on infrastructure contributions. This should be strictly monitored by the council to ensure they are carried through.		Noted.	
Craig Heaney	ANON-BHRP-4HUY-P	Support with observations	Timing is key - the infrastructure needs to be in place before development is completed - we cannot wait for developers to sell houses to fund the transport infrastructure.		Infrastructure will be delivered alongside new development, however a developer cannot be expected to fund the completion of the MORR before they have sold any houses.	
Moira Hart	ANON-BHRP-4HU7-M	Support with observations	This will only work if the facilities being supported have the capacity to be expanded. The likely contributions generated by any housing proposed for Long Clawson would not be sufficient to mitigate the negative effects on the school overcrowding, or to mitigate the flooding, congestion and parking problems in the village.		The Council is consulting with the County Council on matters relating to the capacity of schools, highways safety, parking and flood mitigation and the costs of funding additional infrastructure requirements to determine the capacity of settlements to accept new development.	
CHRISTINE LARSON	ANON-BHRP-4HUU-J	Support with observations	<p>MBC makes no mention of the Community Infrastructure Levy that other authorities use to fund infrastructure costs. This is a serious omission.</p> <p>This will only work if the facilities being supported have the capacity to be expanded. The likely contributions generated from S106 contributions by the housing proposed for Long Clawson would not be sufficient to mitigate the negative effects on the school overcrowding, or to mitigate the flooding, congestion and parking problems in the village.</p>	Ensure that the Borough develops a Community Infrastructure Levy policy as part of the Local Plan	<p>8.9.2 refers to the Council's commitment to the preparation of a CIL Charging Schedule.</p> <p>Consultation on a Preliminary Draft Charging Schedule will take place alongside the consultation on the Pre-Submission Plan</p>	
Clawson in Action - residents' group set up to Keep Clawson Long and Rural and working to support the production of a Long Clawson Neighbourhood Plan	ANON-BHRP-4HBM-Q	Support with observations	This will only work if the facilities being supported have the capacity to be expanded. The likely contributions generated by the housing proposed for Long Clawson would not be sufficient to mitigate the negative effects on the school overcrowding, or to mitigate the flooding, congestion and parking problems in the village.		The Council is consulting with the County Council on matters relating to the capacity of schools, highways safety, parking and flood mitigation and the costs of funding additional infrastructure requirements to determine the capacity of settlements to accept new development.	
Deborah Caroline Adams	ANON-BHRP-4H38-K	Object	Most of the "critical" infrastructure measures required are undeliverable by the deadlines shown unless there is a	More realistic.	A fully costed Infrastructure Delivery Schedule will be prepared for publication alongside the Pre-Submission Plan which will address the issues of timescales and whether items are	

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			concerted effort on the part of the local authorities to secure additional funding from elsewhere. As for the "priority" and "key" infrastructure, there is no mention of those two words in the IDP.		"critical", "priority" or "key".	
Anthony Paphiti	ANON-BHRP-4HBV-Z	Other	I do not understand this "policy". What does "including contributions from residential development towards affordable housing to meet the requirement set out (sic) in policy" mean?	NAC	"set out" refers to the level of contribution i.e. 37% required in the Affordable Housing Policy C4.	
Shelagh Woollard	ANON-BHRP-4HB5-Y	Support with observations	Contributions from residential development should be from the builders and not from new residents who may move into properties.	Rules governing all roads on new developments to ensure all meet highway standards and will be adopted by highways.	All roads are adopted to Highways Standards and proposals consulted on with the Highways Authority. Contributions are made by developers and not residents.	
Clair Ingham	ANON-BHRP-4HMZ-F	Support	I believe that infrastructure should be contributed to by the developers to allow the local area to flourish from the improvements of the developments	None	Noted.	
Melanie Steadman	ANON-BHRP-4HFE-K	Support with observations	Developer contributions could be foregone for certain developments to provide affordable housing, or help to buy or bungalows with a preference for elderly local residents. In village settings, the developments are so small that the contributions do not accumulate to any amounts that will be of any use.	None.	The decision-makers will decide on the priorities for spending developer contributions. However, affordable housing is a separate requirement on developments and is exempt from CIL.	
Louise Odonogue	ANON-BHRP-4H66-M	Support with observations	More emphasis on road improvements and road safety especially in rural locations	Any levy should be spent directly in the location it relates to ie specific villages	Communities are entitled to a proportion of CIL to be spent on infrastructure. 15% can be received by Parish Councils and where a Neighbourhood Plan is in place this can rise to 25%.	
Bottesford Parish	ANON-	Support with		Parish Councils must be involved to identify the	Communities are entitled to a proportion of	

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Neighbourhood Plan Steering Group	BHRP-4HUB-Y	observations		<p>funding needs of the localities resulting from development, e.g .traffic calming schemes</p> <p>The cost of infrastructure and facility enhancements that would be needed at all potential development locations should be assessed before the number of dwellings allocated to each location is finalised.</p> <p>8.4 Education - We hope that a more strategic approach to housing will mean developments at schools will be better planned with improved space utilisation.</p> <p>8.7, 8.7.3, 8.7.4 (p152-153) drains and drain sizing, pumping stations, allowance for the higher levels of precipitation forecast.</p> <p>8.8 (P153) Policing -Crime levels are relatively low but the rural nature of the Vale of Belvoir brings it own problems with police cover in delays in responding to incidents. Concentrating building at Melton Mowbray would allow the most effective use of the existing Police force.</p>	<p>CIL to be spent on infrastructure. 15% can be received by Parish Councils and where a Neighbourhood Plan is in place this can rise to 25%.</p> <p>A fully costed Infrastructure Delivery Schedule will be prepared for publication alongside the Pre-Submission Plan which will set out what and when infrastructure will be delivered to meet the requirements of new housing development.</p>	
Richard Simon	ANON-BHRP-4HZC-5	Support with observations		<p>Parish Councils must be involved to identify the funding needs of the localities resulting from development, e.g .traffic calming schemes</p> <p>The cost of infrastructure and facility enhancements that would be needed at all potential development locations should be assessed before the number of dwellings allocated to each location is finalised.</p> <p>8.4 Education - We hope that a more strategic approach to housing will mean developments at schools will be better planned with improved space utilisation.</p> <p>8.7, 8.7.3, 8.7.4 (p152-153) drains and drain sizing, pumping stations, allowance for the higher levels of precipitation forecast</p> <p>8.8 (P153) Policing -Crime levels are relatively low but the rural nature of the Vale of Belvoir brings it own problems with police cover in delays in responding to incidents. Concentrating building at Melton Mowbray would allow the most effective use of the existing Police force.</p>	<p>Communities are entitled to a proportion of CIL to be spent on infrastructure. 15% can be received by Parish Councils and where a Neighbourhood Plan is in place this can rise to 25%.</p> <p>A fully costed Infrastructure Delivery Schedule will be prepared for publication alongside the Pre-Submission Plan which will set out what and when infrastructure will be delivered to meet the requirements of new housing development.</p>	
Bottesford Parish Council	ANON-BHRP-4H1W-G	Support with observations		<p>Parish Councils must be involved to identify the funding needs of the localities resulting from development, e.g .traffic calming schemes</p> <p>The cost of infrastructure and facility enhancements</p>	<p>Communities are entitled to a proportion of CIL to be spent on infrastructure. 15% can be received by Parish Councils and where a Neighbourhood Plan is in place this can rise to 25%.</p>	

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				<p>that would be needed at all potential development locations should be assessed before the number of dwellings allocated to each location is finalised.</p> <p>8.4 Education - We hope that a more strategic approach to housing will mean developments at schools will be better planned with improved space utilisation.</p> <p>8.7, 8.7.3, 8.7.4 (p152-153) drains and drain sizing, pumping stations, allowance for the higher levels of precipitation forecast</p> <p>8.8 (P153) Policing -Crime levels are relatively low but the rural nature of the Vale of Belvoir brings it own problems with police cover in delays in responding to incidents. Concentrating building at Melton Mowbray would allow the most effective use of the existing Police force.</p>	<p>A fully costed Infrastructure Delivery Schedule will be prepared for publication alongside the Pre-Submission Plan which will set out what and when infrastructure will be delivered to meet the requirements of new housing development.</p>	
JOHN RUST	ANON-BHRP-4HUV-K	Support with observations	<p>1 support these extracts: This will only work if the facilities being supported have the capacity to be expanded. The likely contributions generated by the housing proposed for Long Clawson would not be sufficient to mitigate the negative effects on the school overcrowding, or to mitigate the flooding, congestion and parking problems in the village. MBC makes no mention of the Community Infrastructure Levy that other authorities use to fund infrastructure costs. This is a serious omission. This will only work if the facilities being supported have the capacity to be expanded.</p>	<p>1 support these extracts: ensure that the Borough develops a Community Infrastructure Levy policy as part of the Local Plan.</p>	<p>The Council is consulting with the County Council on matters relating to the capacity of schools, highways safety, parking and flood mitigation and the costs of funding additional infrastructure requirements to determine the capacity of settlements to accept new development.</p> <p>The adoption of a CIL Charging Schedule is a priority for the Council</p>	
Debbie Adams	ANON-BHRP-4H1Z-K	Other	<p>It says in the draft Emerging Options Local Plan on page 147 point 8.1.4 that: "It should be remembered that new development cannot be used to fund an existing lack of infrastructure or address current shortfalls in provision but is solely required to address its own needs." MNAG are concerned that if this is the case, then developers will only be obliged to build an estate link road for their particular development. An estate link road will not be of sufficiently high standard to become part of an Outer Bypass which would be expected to</p>		<p>The link road will be built to an appropriate standard to accommodate HGV movements as well as cars. It will be designed to provide a minimum number of estate access points to provide access to the development.</p>	

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			accommodate HGVs and be an attractive alternative to the current route through the Town Centre.			
Sharon Gustard	ANON-BHRP-4H6K-9	Other	Insufficient information provided in order to be able to support such statements - as with many of the questions within this document they are suitably ambiguous in order to almost 'force' a support answer, to enable the Borough to provide the statistical evidence required.		Noted.	
Wymondham and Edmondthorpe Neighbourhood Plan Committee	ANON-BHRP-4HBD-E	Support with observations	As well as the IDP Neighbourhood Plans should be referenced	"identified in the IDP or local Neighbourhood Plan, as appropriate" in I,II and III	Agree.	Policy amended to refer to infrastructure identified in a Neighbourhood Plan.
Colin Love	ANON-BHRP-4HBR-V	Support	See a number of typos in above text. These provisions by any developer must be to the very highest of design standards - including the quality and size of any housing provided within the so-called 'affordable' and 'social' categories. No getting away on the 'cheap'. The same requirements must be for any road and pavement construction - no 'cheap and nasty' in design.	See above	Noted. The link road will be built to an appropriate standard to accommodate HGV movements as well as cars. It will be designed to provide a minimum number of estate access points to provide access to the development.	
Anthony Edward Maher	ANON-BHRP-4HUS-G	Support with observations	As recent traffic reports have indicated some areas are critical. Only projects which can deliver sustainable sections of bypasses and not just access roads to the development should be permitted.	A specific levy towards a functional bypass. This may help in the case when applying for further bypass funding from government.	The link roads will be provided by the development in the North and South Sustainable Neighbourhoods. Other sites may contribute through S106 contributions or CIL.	
Mick Jones	ANON-BHRP-4H6N-C	Support with observations	Either you want contributions or you don't. Don't hedge your bets.	Remove expected from opening statement.	It is considered that "expected" adequately sets out that developers will be required to make contributions towards infrastructure requirements. However viability of a scheme may mean contributions are negotiated.	
Waltham on the Wolds & Thorpe Arnold Parish Council and	ANON-BHRP-4HBZ-4	Support with observations	So often contributions (Section 106) go outside the parishes - more contributions should be made available to improve local	Contributions are required to enhance the respective communities, for example in providing open green space, car parking, community buildings, etc., etc.	Planning regulations require that contributions from a particular development are spent on infrastructure directly related to that development.	

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Neighbourhood Planning Group			amenities and benefit the affected communities.		Communities are entitled to a proportion of CIL to be spent on infrastructure. 15% can be received by Parish Councils and where a Neighbourhood Plan is in place this can rise to 25%.	
Martin Alderson	ANON-BHRP-4HHU-5	Support with observations	See my previous comments about how these contributions will be severely reduced by the effects of fracking.		Noted.	
Christopher John Noakes	ANON-BHRP-4HBK-N	Support with observations	See above comments in Chapter response	Reference to other forms of development, over and above residential and employment uses.	Noted. Viability evidence will be used to determine whether other forms of development can contribute towards CIL.	
LCC Highways	BHLF-BHRP-4H7Q-G	Support		Pg 154 Policy IN2: Does the MORR need mentioning specifically?	Noted.	Policy amended to identify the MORR.
Anglian Water Services Limited	BHLF-BHRP-4H83-K	Other	<p>It is noted that water infrastructure is identified as being of critical importance. Foul network improvements (on-site and off-site) are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvement are investigated and determined when we are approached by a developer and an appraisal is carried out.</p> <p>Similarly water infrastructure provision will be dependant on location and scale of the development and contributions for upgrades or strategic schemes will be obtained through provisions in the Water Industry Act 1991.</p> <p>As set above we seek contributions directly from developers in accordance with the provisions of the Water Industry Act 1991. Therefore Anglian Water would not expect there to be provision within planning obligations or the Council's CIL Charging Schedule for water and water recycling infrastructure within our area of responsibility.</p>		Noted. Such improvements need to be recognised in the CIL for completeness. However, they will not be sought by S106 or CIL and should not therefore be identified as critical for this purpose.	
LCC Strategic Property Services Asset Management	BHLF-BHRP-4H7J-9	Support	Policy INF2 Infrastructure Contributions – There is general support in principle to the proposed prioritisation of infrastructure contributions but consider that the policy should be drafted such that their determination takes full account should be taken of site viability.		Noted. It is recognised that viability of a scheme may mean contributions are negotiated.	
Leicestershire Police	BHLF-BHRP-4H7S-J	Object	<p>Accepting that Policing is necessary, as you have overtly in this chapter, how can you justify this as anything other than critical in appendix 3 and IN2. Further in the light of this I suggest that it is unacceptable to use a planning policy to assert priorities when a legal test is being applied. Necessary /compliant has to be provided or PP will be refused. I accept that where viability is proven all providers need to look further on a case by case basis but this is entirely different to what is being attempted in this policy.</p> <p>Referring to CIL it is the case that the necessity test will continue to be applied to additional development and obligations to mitigate its direct impact. In addition it is now accepted that R123 CIL infrastructure does not include many of the items that providers require and that are critical if additional development is to be sustainable and its impact mitigated.</p> <p>In view of the potential seriousness of this content in terms of the sustainability of what you propose and the likely harm to existing communities if development does not</p>		The view that Policing should be identified as 'Critical' infrastructure in the IDP is noted. In addition, comments made to Appendix 3 have been noted. These comments will be addressed by Arup, the consultants who have been instructed by the Council to produce an Infrastructure Delivery Schedule. The IDS will be published alongside the Pre-Submission Plan.	

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		<p>provide what is needed and as policing is spread more thinly, I am looking for a meeting at your earliest opportunity. I need to understand how what we have provided has been considered and the outcomes of this in the draft now at consultation. I want to avoid having to leave this to the last minute for an Inspector to consider our likely objection if this remains unchanged.</p> <p>I sense that we have been here before? Please let me have your availability at your earliest convenience.</p> <p>I have also attached a recent contribution request so that you can refer to the content and evidence in this to assist you at this stage. That content is consistent with what I say above.</p> <p>Att Mrs N Rose, Development Control, Harborough District Council, Council Offices, Adam and Eve Street, Harborough, LE16 7AG</p> <p>14/12/16.</p> <p>Dear Mrs Rose</p> <p>RE: Planning application for 600 dwellings and local centre adjoining Overstone House, Market Harborough.</p> <p>Thank you for consulting me on this recent planning application.</p> <p>The nature of the development The application is of a scale of an urban extension to your main town. 600 houses are proposed together with supporting facilities in the form of a local centre and a school. The area is currently 4 large open fields to the east of the town. Access is proposed from Kettering Road through the Overstone House development which I assume has the benefit of planning permission. From the illustrative masterplan a series of neighbourhoods are proposed reflecting the layout and design of family housing in the locality built over the last 25 years. This provides a reliable basis for gathering “baseline” data in terms of local policing demand and deployment.</p> <p>Current levels of local Policing demand Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis and is wholly dependent on a range of facilities for staff to deliver this. Calls and deployments via our control room at Force Headquarters Enderby are monitored and can give an indication of the level of services in different areas such as to the 34,900 existing households in Harborough District and 9823 households in the Harborough town beat in which the site is situated.</p> <p>In the 2013 year we dealt with 52,143 calls from Harborough District, we dispatched emergency attendances to 6602 locations and non emergency follow ups to 3883 addresses. Attributing to the beat 14636 calls were handled, emergency attendances were sent to 1857 addresses and there were 1093 non emergency attendances.</p>	
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		<p>The beat is the town of Harborough and surrounding countryside. Most crime is concentrated in the built areas of the beat and there were 854 recorded crime incidents here in the last year. Burglary and vehicle crime are the largest content. Force wide the level/trend in total crime has been continuous since 1/13 with peaks of late. Likewise burglary with vehicle crime increasing. These trends are similar in the beat although less marked. Police also deal with Anti Social Behaviour incidents and there were 1159 of these in 2013/14 at District level and 327 in the beat.</p> <p>Perhaps a further demonstration of response to demand is the regular patrolling of the locality and local community contact maintained by the Neighbourhood Policing team located at Market Harborough.</p> <p>Current levels of deployment and infrastructures to Police Harborough District. Staff delivering Policing to the locality are spread across the following functions:</p> <ul style="list-style-type: none"> • 78 staff in at Market Harborough providing Neighbourhood Policing and emergency responses • 4 staff in the County Basic Command Unit at Loughborough delivering investigations, intelligence, additional response Policing and LPU management • in delivery teams mainly at Force HQ Enderby - Criminal justice including courts case management and prisoner detention and processing, control centre/contact management, Intelligence research, Operations planning, dogs and firearms, special branch, forensic, Road Policing, Workshops/garages, Tactical Support Group, Road Safety Unit, IT and communications, Safeguarding/ vulnerability, Child abuse team, Economic crime team and in Regional/major crime working. • in organisational support functions at Force HQ Enderby providing finance, human resources, welfare, estates, training and top level management of the Force. 115 staff are employed delivering these later two functions to Harborough LPU/District area. <p>197 staff deliver Policing to Harborough District</p> <p>Because of the integrated nature of Policing- there no longer being one local police station serving all the local need - all these functions will be called upon to deliver Policing to the proposed development. Across our 197 staff employed to deliver Policing to Harborough Policing an existing development of this size would occupy the time of 3.13 existing staff. Staffing levels are under constant review to ensure that minimum numbers are deployed to meet existing levels of Policing demand. This has the benefit of saving costs, but as a result there is no additional capacity to extend existing staffing to cover additional development. The methodology here is we employ 197 staff to the 34900 existing households in Harborough district at a ratio of 192 households to one member of staff. 600 Households are proposed representing the time of 3.13 existing members of staff.</p> <p>Where additional development is proposed we will seek to deploy additional staffing and additional infrastructures at the same level that is required to deliver Policing to the locality. It would be complacent not to do this because additional pressure will be put on existing staff and our capital infrastructures and this will seriously undermine our ability to meet the Policing needs of this development and maintain the current level of Policing to the rest of the beat and across Harborough District. The impacts of the development are so significant that they cannot be met without additional staff deployed at a level consistent with current Policing of the locality of the development.</p>	
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		<p>The following infrastructure is required for all Policing activities in Harborough District;</p> <p>Personal equipment for staff comprising workstations, radios, protective equipment, uniforms and bespoke training. In general we retain this equipment when existing staff leave and are replaced however additional staff will require additional equipment. There are practical limits to the extent to which existing equipment can be re used eg with uniforms or where technology has moved on.</p> <p>Police vehicles of varying types and functions covering existing patterns of development and community demand. The 22 fully equipped vehicle fleet is kept at a level to meet existing patterns of demand from the District with reductions made whenever possible. Vehicles are used by staff on patrol, deployed to deal with emergency responses, apprehending suspects and for follow up of recorded crimes eg by Scene of Crimes Officers. This includes transporting victims and suspects and the use of additional comms equipment in vehicles to effectively deliver local Policing. Staff also depend on vehicles for their safety. There is no capacity in this deployment for increases to meet the demands of growth.</p> <p>Radio cover in the form of 6 base stations sufficient to cover the existing pattern of development and investment in hardware, signal strengthening and re direction to ensure the capacity of this system to meet existing call levels at £10,000 pa.</p> <p>Police National Database availability and interrogation again with hardware costs to ensure this capacity of £6400 pa. The system is now at planned capacity including dealing with 2792 hits pa as a result of Policing the existing communities of Harborough.</p> <p>Control room telephony We employ 13 staff to take and deploy responses to calls from Harborough District. The control centre is maintained to capacity use and there are particular times when our telephony runs close to overload eg at weekends and evenings.</p> <p>CCTV technologies including 7 ANPR cameras at strategic road locations in the district to detect crime related vehicle movements and 1 mobile unit deployed with local partners to detect and deter crime at hotspots. These have in the past been deployed as funding has permitted, including s106 receipts, in an attempt to cover the existing pattern and size of development. There is no capacity to meet the additional demands that growth places upon these. New developments should benefit from the same technology as elsewhere in the District where it has been shown to detect and deter crime.</p> <p>Hub access points with four beat drop in hubs already functioning in the District these are established where partners offer premises cost free and again in an attempt to cover the existing pattern and size of development. They need to be equipped and where additional development is proposed with increases in demand for this deployment we seek developer contributions for additional equipment and local crime initiatives.</p> <p>Premises sufficient to accommodate the staff and services outlined above in Harborough District and beyond and particularly at Force HQ Enderby. The Force have an active estates review function minimising our premises need to meet existing Policing demand. We just can't afford to have buildings under used and will dispose of these wherever necessary using receipts to re invest where there are known difficulties. The existing premises at Harborough which serve the locality are used to capacity and will need to be</p>	
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		<p>extended or adapted to take additional staff to Police additional housing.</p> <p>Turning to Force HQ a number of specialist functions and support teams are located at our 11 hectare site. Typical is our control room at capacity at peak times and where 13 existing staff are employed to process existing calls from Harborough district. Additional staff will need to be employed to take additional calls from the new development and to deploy our resources as responses to these. These additional staff will need to be accommodated.</p> <p>Other capital infrastructures such as specialist equipment in use by Forensics, our tactical teams eg in firearms and dog handling, freestanding IT and data recording in relation to vulnerable groups, prisoner detention, transportation and processing including cells at core locations. At the moment there is limited capacity in these infrastructures and we do not seek developer contributions to expand them.</p> <p>The disposition of Leicestershire Police as regards major growth development and our budget.</p> <p>A primary issue for Leicestershire Police is to ensure that new development of this scale makes adequate provision for the future Policing needs that it will generate. Like some other public services our primary funding is insufficient to be able to add capital infrastructures to support major new development when and wherever this occurs. Further there are no bespoke capital funding regimes, eg like Building Schools for the Future or the Health Lift, to provide capital re investment in our facilities. We fund capital infrastructures by borrowing. However, in a service where over 90% of our budget is staffing related, our capital programme can only be used to overcome pressing issues with our existing facilities eg premises replacement at Loughborough or to re provide essential facilities like vehicles once these can no longer be used. This situation has been recognised by the Association of Chief Police Officers nationally for some time and there are public statements which explain our particular funding difficulties and a copy is attached. The position of Police funding was examined and verified by external consultants employed by Local Councils - The Leicestershire Growth Impact Assessment of 2009 which concluded at para 82 in relation to Policing "It is sensible to assume that most of the capital requirements incurred by growth will not be covered by existing mainstream central and local funding". I attach these documents for reference.</p> <p>I also attach our current budget for consideration together with an annotated commentary. These budget figures are included in LP accounts which have been audited as accurate and satisfactory and they have been presented to LPAs in the past. This evidences our position, that our revenue sources [lines E in attached] even when added to as a result of additional housing [line A in attached] are not even sufficient to maintain existing staffing [these costs included at line C in the attached]. This demonstrates that we use additional income from additional housing to mainly pay for staffing. From the figures revenue is decreasing significantly with no scope for borrowing to add capacity to our capital infrastructures the need for which is triggered by additional development.</p> <p>We use our funds as far as they stretch to meet the demands of an expanding population, overwhelmingly for staffing, however as I have said it is the limit of these funds that propels our requests. This situation also prevails in all other public services seeking contributions and there is nothing different here as far as Policing is concerned. What is different is that Police do not enjoy effective capital income from the usual</p>		
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		<p>external public taxation sources. This evidences that Police do not make requests where we have other funds that will meet our needs.</p> <p>The reality of this financial situation is a major factor in our advance planning and alignment with plans for growth in that whilst we can plan using our revenue resources to meet our ongoing and, to a limited extent additional revenue costs, these do not stretch to fund necessary additional investment in our capital infrastructures. That is why all Plan documents across our area include additional capital infrastructure to accompany growth, and that is what NPPF expects in its assertions about inclusive infrastructure planning and the delivery of this by Planning. This can be evidenced by reference to content in HDC's adopted Core Strategy.</p> <p>Some developers have sought to suggest that additional housing does not lead to increases in population whilst others accept in proposing legal agreements " as with all new residential development the new homes provided and the new population that they will create will have some impact on the local services and infrastructure within x" Applicants, as here, promote their schemes on the basis of increases in population growth supporting local shops and services and that they attract people to the area.</p> <p>Further</p> <ul style="list-style-type: none"> - it is a fact that population and in migration to Leicestershire is increasing - re occupation of vacated housing as people move to the new development will maintain existing levels of Policing demand in addition to the new demands of additional development. - new housing cannot just accommodate a static population moving around because if that were the case there would be no need to increase housing stock - assuming new populations is a pragmatic stance used by all services responding to growth with contribution requests, not just Police. This is the "inescapable" conclusion in the Barrow Upon Soar Secretary of State decision referred to below. Judge Foskett in the Police JR case referred to below considers the "consumer view" where populations occupying a new area might experience inadequate provision for policing by developers. <p>In response to this theoretical assertion, using up to date census information, which takes account of additional households and people, including the effects of migration, is the sensible way to establish service demand comparables. I attach legal opinion sought from Ian Dove QC considering these evidential matters and what the Police provide.</p> <p>Faced with unprecedented levels of growth being proposed across our sub region Leicestershire Police have resolved to seek developer contributions to ensure that existing levels of service can be maintained as this growth takes place. We are a regular and constant participant in the statutory Planning process evidencing the impact of growth through work with local Councils in their Plan making, preparation of guidance, preparations for CIL and the consideration of individual Planning applications including attendance at appeals. Police nationally encourage this approach to offset the impact of growth on the Police service.</p> <p>The Policing impact of 600 additional houses at the site. The proposed development will increase the overnight population of this settlement by at least 1470 people. It is an evidenced fact that 600 additional houses will bring additional Policing demands and particularly as there is no Policing demand from what is currently open land. I do not doubt that there will be a corresponding increase in crime and demand from new residents for Policing services across a wide spectrum of support</p>	
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		<p>and intervention as they go about their daily lives at the site and across the Policing subregion. That will include use of the local centre and the school where a considerable day time population will be bolstered by use and visits to these support facilities. Police can evidence the crime patterns generated by such uses.</p> <p>Empirical data based on existing crime patterns, and policing demand and deployment from nearby residential areas indicates the direct and additional impacts of the development on local Policing that will be manifested in demand and responses in the following areas-</p> <ul style="list-style-type: none"> • 894 additional calls and responses per year via our control centre. • Attendance to an additional 113 emergency events within the proposed development and locality. • 67 non emergency events to follow up with public contact within the development and locality each year. • 52 additional recorded crimes in the locality per year based on beat crime and household data. In addition 20 recorded anti social behaviour incidents each year within the new development and locality. • The demand for increased patrol cover. • Additional vehicle use relating to 76% of an additional vehicle over a 6 year period. • Additional calls on our Airwaves system where our funding seeks to maintain capacity for call demand at current levels. • Additional use of our PND systems to process and store crime records and intelligence and based on existing levels of use equating to 48 additional hits and data entries per year. • Additional deployment of Mobile CCTV technologies • Additional demand for access to beat staff from the Harborough neighbourhood policing team. • Additional Policing cover and interventions in all the areas described when considering staffing and functions above and for additional accommodation from which to deliver these. • <p>Planning Policy justifications for a Policing contribution</p> <p>The National Policy position to support our request exists in NPPF. Securing sufficient facilities and services to meet local needs is a Core Planning Principle [para 17]. Planning is to deliver facilities and services that communities need [para 70] and Supplementary Planning documents can assist applicants in this. Plan policies should deliver the provision of security infrastructure and other local facilities [para 156]. Plan policy and decision making should be seamless [para 186]. Infrastructure Planning should accompany development planning by LPAs [177] who should work collaboratively with infrastructure Providers [162]. NPPF seeks environments where crime and disorder and the fear of crime do not undermine the quality of life, the health of communities and their cohesion [58 and 69] and Planning Policies and decisions should deliver this.</p> <p>There is overarching local support at policy 12 in the Harborough Core Strategy as regards contributions. The Council reviewed its developer guidance to include developer contributions towards Policing after stakeholder consultation in September 2009. Leicestershire Police were fully involved in the preparation of the Core Strategy which identifies growth and the need for additional Police infrastructure, as defined in an Infrastructure Plan, to accompany this and including provision for Harborough and Leicester PUA. This approach has been through Examination wherein the Inspector asked developers whether they were content with the Councils approach to infrastructure</p>		
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		<p>Planning and contributions. The response at the relevant session was affirmative. This demonstrates a sound approach as regards infrastructure delivery in line with guidance in NPPF. I have provided further information on essential Policing infrastructure to assist in the Council's deliberations on CIL charging and to inform further iterations of infrastructure planning for Harborough Districts new Local Plan.</p> <p>The Police contribution request £173013 is sought to mitigate the additional impacts of this development because our existing infrastructures do not have the capacity to meet these and because, like some other services, we do not have the funding ability to respond to growth whenever and wherever proposed. We anticipate using rates and home Office revenues to pay for staff salaries and our day to day routine additional costs [eg call charges on telephony and Airwaves, vehicle maintenance and so on]. As already confirmed these sources do not have the capacity to fund additional borrowing for additional capital infrastructures necessitated by the development.</p> <p>Police expect to procure these additional facilities once development has commenced. The contributions will be spent as individual amounts to expand the cover of our infrastructures to serve this specific development. Where individual contributions do not secure whole infrastructures Police may pay the remaining amounts.</p> <p>As a further justification of our request, we confirm that the contributions will be used wholly to meet the direct impacts of this development and wholly in delivering Policing to it. Without the development in place it is reasonable to forecast the impacts it will generate using information about the known Policing demands of comparable local development. We believe the Framework encourages this.</p> <p>The development should make provision to mitigate the direct and additional Policing impacts it will generate and cannot depend on the Police to just absorb these within existing facilities with limited capacities and where Police have no flexibility in our funding to do this. This has been the situation since 2006 when Leicestershire Police started to seek contributions. It is not forced by current spending reductions although strictures across the public sector re-enforce the need to ensure developments mitigate the direct impacts they cause.</p> <p>I should add that this is consistent with Inspectors consideration in recent appeal decisions. What follows is a detailed explanation of Methodologies used to calculate the contribution and our application of the NPPF tests to justify each of these.</p> <p>Mitigation of impacts and methodologies identified by Leicestershire Police Baseline background. At October 2014 total floorspace occupied by the Force to deliver Policing to this locality and the subregion more generally was 48,726m². We employed 3512 staff to do this. Existing households in the Police district [2011 census] was 405,500 with 34,900 in Harborough District. Across the Force 197 Police staff deliver Policing to the District.</p> <p>Households to staff for Harborough is 192:1 Floorspace to staff Forcewide is 14 m².</p> <p>Equipping staff. Additional staff needed to Police the development will require additional equipment.</p>	
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		<p>For a Police Officer the additional equipment items are uniform £873, radio £525, Workstation £1508, De Montford University foundation/basic accreditation £2333, Other external Training £2182. Uniformed officers work in shifts where workstations can be shared and as a result start up cost will be £7421 per uniformed officer.</p> <p>For other staff the additional equipment items are workstation £2286 and training £687, total £2973.</p> <p>We employ staff to officers at a ratio of 0.33 to 0.66 and so the average cost of equipping a new member of staff is £5879.</p> <p>Because the development is forecast to generate the need to employ 3.13 new members of staff the contribution for equipment should be £18401 from this new development.</p> <p>The Force could not have officers attending this development with less than adequate equipment with un-necessary risks to themselves and occupiers served.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Crime and community safety are Planning considerations and the Councils Core Strategy content further demonstrates this. The Framework identifies the need to achieve security in new development and makes provisions to deliver this through the planning system. Deployment of equipped staff is fundamental to delivering community safety and mitigating crime.</p> <p>Is it directly related to the development? The Policing demands of this development are identified and Police mitigation of these can only be delivered by adequately equipped staff. The necessary contribution is specific to this site and to this development.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and the Policing demands it will generate are known by comparison with local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Demand and mitigations have been determined by the scale of the development.</p> <p>Will the contribution be pooled? The contribution will mitigate the impact of this specific development and will be spent to achieve that in the form of an individual project. What is required to mitigate the impact of this particular development does not depend upon any other contribution and no other contribution will be used to pay for this. Depending upon the local planning and development process and its implementation, should police proceed to combine this spend with other local contributions, we can manage this to ensure that the pooling restrictions in the CIL Regulations are not offended. Drafting for the s106 can secure this.</p> <p>Police vehicles In managing and responding to crime a number of different vehicles can be deployed ranging GRV patrol cars, unmarked general support vehicles, Public Service Unit vans and minibuses, scientific [eg SOCO] vehicles, pursuit vehicles - 4x4 and high speed, motorcycles and so on. Current fleet deployment to Harborough is 22 vehicles serving 34900 existing households. The average equipped cost of a vehicles is £15,774 and this is very close to the actual cost of a GRV. Our guideline for the majority of marked vehicles is to replace every three years or 120,000 miles. The condition of vehicles at the end of their Police life varies however we forecast that we will redeem 10% of a vehicles original value on disposal.</p> <p>22 units at net value £312325 Existing households 34900 = £8.95 per H hold x 2 to give 6 year life of provision.</p>		
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		<p>In relation to this particular development additional vehicle costs to deliver Policing and meet community safety needs will be £10740. Impact of the development without the contribution will be pressure to spread existing transport more thinly. Residents of the new development and their representatives will expect the same degree of cover as elsewhere in the locality and existing residents will expect existing cover to be maintained and not reduced as a result of the new development.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Vehicles are a fundamental capital infrastructure and facility to deliver community safety and address crime especially to dispersed settlements and wherever residents have need including to the additional homes being provided.</p> <p>Is it directly related to the development? Fleet deployment is related to the known Policing demands of comparable development in the locality. The direct additional demand from the new development can be accurately forecast. Delivering Policing direct to this development will not be possible without additional vehicles to do so. The contribution will be spent to serve the development and is not required to meet a funding deficit elsewhere or to service any existing development. The contribution is specific to this site and to this development and it will be managed and spent on this basis.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and the Policing demands it will generate are known by comparison with similar development in the adjoining settlements. This is the only satisfactory way of determining the Policing need from a development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the development.</p> <p>Will the contribution be pooled? The contribution will mitigate the impact of this specific development and will be spent on additional vehicle procurement to serve it. That procurement is not dependent upon any other developer contribution. The contribution is less than the cost of a whole vehicle and Police may pay for the remaining part. No other contribution will be used to pay for this specific requirement. Depending upon the planning and development process should police proceed to combine this spend with other local contributions we can manage this to ensure that the pooling restrictions in the CIL Regulations are not offended. Drafting in the s106 can secure this.</p> <p>Radio Cover/capacity It is necessary to expand the capacity of our existing system to cater for additional calls as a result of the development. The development will increase the use of our radio system which is maintained at existing capacity by investing in additional servers, system refinement signal strengthening and improved transmission technologies. We spent £10,000 pa adding such capacity to the existing system in Harborough which serves 34,900 households. Annual cost of these capacity increases to an existing household is £0.28. Capacity improvements are expected to last for 5 years and without these the system will fail to adequately carry both existing and additional calls as a result of this additional development. The additional cost of the additional capacity in relation to houses in this development will be £840.</p> <p>The impact of the development on Policing with reduced Airwaves capacity will be</p>	
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		<p>increased attendance times, delays in message passing and the implications of this for attendance and apprehension. Occupiers and those that represent them will expect the same performance/response levels as we currently operate in Harborough.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Deployment to adequately deliver community safety will not be met where this is prejudiced by insufficient radio system capacity. Crime, community safety and security are Planning considerations.</p> <p>Is it directly related to the development? The additional demands of this development in relation to this infrastructure have been identified as have mitigations.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? The additional demands of this particular development in relation to this infrastructure have been identified as have mitigations. The contribution will be spent to serve the needs of this specific development and is not required to meet a funding deficit elsewhere or to service any other development.</p> <p>Will the contribution be pooled? Because of the scale of police procurements in IT and comms., contributions of this scale are spent without the need for pooling. Procurement will not depend upon any other developer contribution.</p> <p>Police Database capacity. It is necessary to expand the capacity of our existing system to cater for additional hits as a result of the development. This is a secured stand alone information source integrating a variety of data nationally and allowing this to be compared over time in relation to individuals and locations. Additional hits as a result of the development to access existing crime information and add more crime data to be accessed by more staff generate a need to add capacity to this system. The current system and access to it reached planned capacity usage this year. We spend £6400 on system enhancements to serve Harborough or £0.18 per household per year. Over 5 years the development should contribute £540.</p> <p>Failure to increase PND capacity in step with growth the subject of this application will directly impact the capacity of the Force to rapidly access and respond to crime information.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Deployment to adequately deliver community safety will not be met where this is prejudiced by insufficient capacity in the Police PND system.</p> <p>Is it directly related to the development? The specific additional demands of this particular development in relation to this infrastructure have been identified as have mitigations. The contribution is directly related and specific to the site because it will be spent to serve the development and is not required to meet a funding deficit elsewhere or to service any other development.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and the Policing demands it will generate, in terms of PND use, are known by comparison with other local residential development. The</p>		
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		<p>development is not built and this is a reasonable way to forecast this impact. Demand and mitigations have been determined by the scale of the development.</p> <p>Will the contribution be pooled? Because of the scale of police procurements in IT and comms., contributions of this scale can be spent without the need for pooling. It will not depend upon any other developer contribution.</p> <p>Control Room telephony Police control room call handling equipment is used to capacity at peak times. Our call handling centre at Force HQ Enderby directs all calls and deploys resources to respond and continue monitoring. We know the capacity of the technology and the calls it currently handles [fixed around minimum times with callers] and will be expected to handle as a result of the proposed development and the costs of providing this. 5.7% of all calls handled relate to the 34900 households in Harborough and additional calls forecast from this development are identified. The Council proposes 2700 additional houses in their district in their plan periods. Each new household in the district will generate a need to invest an additional £3.68 in this system. The development should contribute £2208 towards the additional equipment needed to answer the additional calls it will generate.</p> <p>There will be a call handling impact and delays in response times if we attempt to serve this development with our current telephony systems.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Crime and community safety are Planning considerations and the Councils Core Strategy content further demonstrates this. NPPF identifies need to achieve security in new development and makes provisions to deliver this through the planning system. These considerations will not be met where Policing delivery is prejudiced by insufficient telephony capacity to take calls and deploy responses in good time.</p> <p>Is it directly related to the development? The specific additional demands of this particular development in relation to calls and responses has been identified as have mitigations. The contribution is directly related and specific to the site because it will be spent to serve the development if and when it commences and is not required to meet a funding deficit elsewhere or to service any other development.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and the Policing demands it will generate, in terms of use of control room telephony, are known by comparison with other local residential development. Demand and mitigations have been determined by the scale of the development.</p> <p>Will the contribution be pooled? Because of the scale of police procurements in IT and comms., contributions of this scale will be spent without the need for pooling. Procurement will not depend upon any other developer contribution.</p> <p>ANPR CCTV Deployment Police are deploying fixed ANPR cameras on main road network and close to or in settlements. These cameras are server linked to identify number plates of vehicles in use for crime. This type of camera offers particular benefits to the</p>		
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		<p>immediate surrounding area especially where there are high levels of vehicle related crime. We deploy these as resources permit however our financially constrained programme makes no provision for the impacts of additional areas of housing. The use of these technologies has a beneficial impact in terms of minimising staff attendance. Unit cost is £8000 which includes installation and satellite links. Additional server capacity will be required to process and store images and integrate to PND at £222 per new camera. Police take the view that, in the light of local crime patterns in this beat, the sites dependence for accessibility from the Trunk Road/Kettering Road as a main access to the east of the town and the mixed use nature of the development, an ANPR camera is required in this locality and that a part contribution should be made by this development of at £5426.</p> <p>Impact without this contribution will be an inability to monitor crime related vehicle movements and address incidents effectively. Our response would be less than available elsewhere in Harborough District where this cover is provided and this is a resource which is considered to generate a more effective response to crime than other methods which would have to be deployed in its absence. The rationale in this request is via a cascade of considerations; to what extent will access be direct from main nearby routes, will wider access patterns change as a result of the development, are there existing cameras on these routes, what is a proportionate contribution by the size of the development [1,000 dwellings justifying a camera and at the lowest end no contributions sought for schemes of less than 20 dwellings]. Developers have suggested a universal methodology as the right approach to deliver what is necessary. This is flawed because factors like accessibility and police demand are not uniform. Further NPPF requires timely delivery of what is necessary and that this be directly related to the development. Police are not confident that many small contributions would achieve or deliver this.</p> <p>Mobile CCTV Deployment Units are acquired as funding, including s106, permits however our financially constrained programme makes no provision for cover of additional areas of development. Cameras are deployed in partnership with other local agencies to detect and deter crime and can be moved to follow crime patterns. Typical locations are where there is an expressed fear of crime, at emerging crime hotspots that residents use eg near commercial premises, or where there are increasing levels of anti social behaviour. Unit cost is £1500 and Police pay the revenue costs for movement. Bearing in mind the location and nature of the development as previously described and the local crime situation a part contribution towards a mobile unit is required to serve the development at a cost of £1125.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Community safety and security is a Planning consideration and NPPF provides guidance about local facilities and the provision of security. Deployment of CCTV technologies significantly increases detection and deterrence with reduced need for staff presence and particularly contributes towards achieving community safety. This will be prejudiced where new development places additional demands on existing deployment without mitigation and the ability of these technologies to deliver safety is undermined where new development adds to network gaps.</p> <p>Is it directly related to the development? The additional demands of this specific development in relation to this infrastructure have been identified as have mitigations. A part and proportionate contribution will enable deployment to the appeal development and surrounding areas over time and in</p>	
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		<p>response to the community safety needs of the development. The nature of the development and its size and location in relation to the existing settlement and camera deployment are a direct consideration in these technologies. The contribution will be spent to serve the development and is not required to meet a funding deficit elsewhere or to service existing development.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and the Policing demands it will generate, in terms of additional crime and vehicle movements, are known by comparison with other similar residential development in the locality. Demand and mitigations have been determined by the scale of the development.</p> <p>Is it necessary to pool this contribution? Procurement can proceed without reliance on any other developer contribution and will be specific to this development site and triggered by its development. Depending upon the planning and development process should police proceed to combine this spend with other local contributions we can manage this to ensure that the pooling restrictions in the CIL Regulations are not offended. Drafting for the s106 can secure this. Premises Within Harborough neighbourhood policing is delivered from premises at Market Harborough. Additional staff will need to be accommodated to serve the development. Occupation of local and Force wide premises is maintained to capacity. Premises cost is amount of floorspace per staff member [14] x number of staff generated by the development [3.13] x Build and land/lost opportunity cost [£2794] giving a total of £122433 from this development. An actual build cost is provided derived from recent tender of premises work. Police have an active estates programme including in house expertise to deliver premises projects in good time and to meet changing police needs. We are able to deliver a specific project to meet the additional premises demands specific to this development. This will deliver the necessary additional floorspace we have identified, at the cost we have evidenced and in the premises identified.</p> <p>Police are of the view that there is sufficient information here for a planning decision to be made and agreement entered. We cannot proceed to procure to design and build without funds to do so from the development. Our public funding position will not allow anything else.</p> <p>This will be spent to adapt or extend facilities at the Local police station and Force HQ Enderby. Leicestershire Police own the freeholds of these buildings.</p> <p>Impact of this development without premises expansion to accommodate additional staff will be an unacceptable degree of overcrowding and inefficiencies in responses and in delivering Policing as a result.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Crime and community safety are Planning considerations and accommodating staff in the optimum location to serve the development is essential if these are to be satisfied.</p> <p>Is it directly related to the development? The additional staffing needs the development will generate have been established by reference to existing local deployment reflecting the actual Policing demands and crime patterns of the locality. In a similar vein the premises requirements that result from the need to accommodate additional staff at these levels is known. A direct relationship</p>		
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		<p>between the development, additional staffing and accommodation is demonstrated and it is appropriate to mitigate this through the planning system.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and the Policing demands it will generate are known by comparison with similar development in the area. Numbers of staff delivering Policing to meet the local demands of existing development of this nature are known. This is the only satisfactory way of determining the Policing need from a development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and the necessary mitigation have been determined by the scale of the development.</p> <p>Will the contribution be pooled? The police estate responds to the changing demands for policing. This together with 24/7 use generates a significant capital stream within which contributions of this scale can be applied to individual projects. There may be no need for other contributions to be secured before this can be delivered depending upon the planning and development process and the size of the contribution. However should police decide to combine this contribution with any other contributions on a particular project it will be done in such a way as to ensure that the pooling restrictions in the CIL Regulations are not offended.</p> <p>Equipment for additional access hub to serve the locality. This new development will increase the demand for local accessibility to Policing. Police are delivering hubs to existing communities and have a model for these. We do not pay for host premises but do need to provide secured work stations for beat officers to support local residents. The equipment components are ISDN and mobile data terminal, laptop, security for laptop and minor security works to host premises. Typical hub catchment is 4,000 households which will include those in this new development. The cost of a single workstation is £4000. The developer is asked to contribute £1 per new dwelling towards equipping a new hub to serve the locality.</p> <p>In association with a hub Police expect to meet the demand for additional local crime initiatives as a result of new development. We have restricted funds to deliver such initiatives to existing development to pay for equipment eg Smartwater kits[fluid, sprays, detectors] or signage for local occupiers to use. Each initiative budgets for capital expenditure of £4,000 with the developer again asked to contribute £1 per new unit.</p> <p>Is the contribution necessary to make the development acceptable in planning terms? Crime and community safety are Planning considerations and ensuring accessibility for the public to Policing is important to community safety, combating and reducing crime and the fear of crime.</p> <p>Is it directly related to the development? A new local hub will specifically serve the development and a proportionate contribution towards providing this is sought.</p> <p>Is the contribution fairly and reasonably related in scale and kind to the development? This is a residential development and accessibility of beat Policing for residents is an increasing part of the service. More hubs are being provided to existing communities but there is no capacity to extend these to cover additional areas of housing. The contribution is based on the scale and kind of residential development.</p>	
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		<p>Will the contribution be pooled? This will not be necessary as the contribution will be used to meet the additional demands of this specific development. Procurement can proceed without the need for any other contributions.</p> <p>SUMMARY OF CONTRIBUTION REQUESTED This police contribution request considers the amount and type of development proposed and compares this with existing Policing demand and crime information for the beat and neighborhood policing area in which it will be situated. The existing deployment of Police assets to Police the area identified and applied to the beat and to forecast the impact of this individual development. The funding and capacity position of the Force is defined. NPPF and local Policy supporting a Policing contribution are identified. Commitments are made to manage the contribution. Finally the contribution is itemised as below with individual methodologies applied to identify a series of infrastructure projects necessitated by this development. CIL tests of compliance are applied to these.</p> <p>Start up equipment £18401 Vehicles £10740 Additional radio call capacity £840 PND additions £540 Additional call handling £2208 ANPR £5426 Mobile CCTV £11225 Additional premises £122433 Hub equipment £1200 Total £173013</p> <p>Conclusion Leicestershire Police have refreshed our approach to contributions taking account of legal advice and we make an effort to keep these up to date reflecting our current deployment. All providers should perhaps do likewise to demonstrate an ongoing attempt to minimise asset use and deliver at capacity. This updating counters some developer's assertions that there is spare capacity in our infrastructures and deployments. That is demonstrably not the case, spare capacity is removed instantly because we cannot afford otherwise as demonstrated throughout this request where ever capacity is defined. That lack of capacity in existing infrastructure to accommodate the population growth and associated demands occasioned by the development means that it is necessary for the developer of the site to provide a contribution so the situation might be remedied. The request is directly related to the development and the direct Policing impacts it will generate based on an examination of demand levels in adjacent areas and existing Policing demands and deployment in relation to this. The request is wholly related to the scale and kind of the application development.</p> <p>We follow the proportionate approach in this request advocated by NPPF and have yet to find any other way of assessing and identifying the impact of additional households in a new development on Policing. The demand for policing changes over time and this can be reflected in our deployment and indeed a relationship between these however we have to take a view on this at the time applications are made. Using up to date information is the only sensible way to demonstrate Policing impact and again this is what NPPF steers us to.</p>		
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		<p>The application submission does not include any consideration of the impact of the development on local services, including policing and the sustainability and acceptability issues that arise. There is no consideration of your core strategy policy nor guidance on developer contributions. There is no heads of terms in the submissions. Police raise a formal objection on sustainability grounds and because the development is unacceptable without the necessary Policing contribution.</p> <p>No viability matters are raised in the current submissions. If that is raised by the developer it will be necessary for Police to consider this request further alongside other service providers. In such circumstances planning decision making needs to be open and transparent to providers and we have recent experience of working with HDC to achieve this. It cannot be that some services are singled out for consideration in an unbalanced and closed way as rendering a development unviable when other infrastructure providers see their requests met in full. This was the matter referred to the High Court recently [Lubbesthorpe in Blaby] and on considering our case the judge found</p> <ul style="list-style-type: none"> - the Police Challenge could not be characterised as a quibble [para 61] - occupiers of the development will want to know that they are living in a safe Policed environment - the consumer view of the issue [para 61]. - Police have statutory responsibilities to carry out and although the sums at stake are small in comparison with what will be required to complete the development the sums are large for Police [para 61]. - if a survey of local opinion were taken concerns would be expressed if it were thought that the developers were not going to provide Police with sufficient to meet the demands of Policing the new area. Fair points are made by Police about the terms of the agreement [para 62]. - Looked at objectively the way the Police contribution was handled in the s106 is not very satisfactory and there are some legitimate criticisms to the formulation of the trigger mechanism. - the Judge suspected that irrespective of the outcomes of this case, the issue of the timing of Police contributions will have to be revisited [para 84] - the Judge noted that it was the content of meetings between the developer, County Council and Blaby Officers that constituted the decision about the s106 agreement [Para45]. Even though correspondence continued with Police after these in reality the decisions had been made by then [para51]. <p>Although the sustainability of the development is asserted in the submissions I see no consideration of your Impact assessment and the impact report that you require does not seem to be included. This should identify the impact of the development on local services and necessary mitigations. Inadequate provision for policing will have a long term and negative impact on this development and on the rest of the Harborough Community. The Planning Inspector at Barrow Upon Soar considered this aspect at length drawing upon what NPPF has to say about the health, safety and security of communities and new development and I refer to this below.</p> <p>Although our case is made in relation to this individual application at appeal I draw the Inspectors attention to 19 recent appeal decisions attached and the view of Inspectors and the Secretary of State as to the compliance of our requests in our refreshed approach. That is all the appeal decisions considering this approach including ones in Harborough. Police are of the view that this is now a material consideration to be weighed in consideration and reporting of this appeal/application.</p>		
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		<p>In one of the appeal decisions attached [Barrow Upon Soar] the Inspector concluded at para 291 forward-</p> <p>" it seems to me that the introduction of additional population and property to an area must have an impact on Policing , in the same way as it must on education and library services for example. Moreover it also seems to me that the twelfth core planning principle of the framework, that planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs, can only be served if Policing is adequate to the additional burdens imposed on it in the same way as other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to para 69, should aim to achieve places which promote, inter alia, safe and accessible environments where crime and the fear of crime and disorder, do not undermine quality of life or community cohesion.....adequate policing is so fundamental to the concept of sustainable communities that I can see there is no reason, in principle, why it should be excluded from the purview of s106 financial contributions, subject to the relevant tests applicable to other public services There is no reason it seems to me why Police equipment and other items of capital expenditure necessitated by additional development should not be funded alongside for example additional classrooms and stock and equipment for libraries"</p> <p>The Secretary of State agreed with this conclusion.</p> <p>I also refer to the Inspectors consideration in the Mountsorrel Lane case attached and also in Charnwood. The Inspector outlined the Police case at length concluding at para 8.45 " In my view the sum of £106,978 has been arrived at following a close and careful analysis of the current levels of policing demand and deployment in Charnwood, so that the impact of the development could be properly assessed and a contribution sought that accurately reflects the precise need that would arise from the development of 250 new homes on the appeal site. The LP has confirmed that the contribution would be spent on infrastructure to serve the appeal development and is not required to meet a funding deficit elsewhere or to service existing development.</p> <p>At para 8.46 " I consider that the contribution is necessary to make the development acceptable; it is directly related to the development and to mitigating the impacts that it would generate and is fairly and reasonably related in scale and kind to the development. The Undertaking therefore meets the three tests of Regulation 122 of the CIL Regulations 2010 and the criteria in paragraph 204 of the NPPF. I accord the undertaking significant weight and I have had regard to it as a material consideration in my conclusions.</p> <p>The Secretary of State agreed with the conclusions of the Inspector as regards the Policing contribution. In relation to Reg 123[3] the latest of these appeal decisions [Greenhill Road. Coalville] provides Inspector consideration. Attention is particularly drawn to para 69 where the same approach, as here, ensured that this was not offended to the satisfaction of the Inspector.</p> <p>Turning to drafting most agreements I see have police contribution in the definition with the overall amount and an itemisation there or in a schedule. The contributions should be index linked.</p> <p>We ask for 50% of the contribution to be paid on first occupation and the rest by occupation of half of the development. Happy to hear any arguments, eg Cashflow,</p>		
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		<p>which might cause us to agree changes to this alongside other providers.</p> <p>Clawback 5 years from last payment to Police however longer is preferred. In the District Council covenants we are looking for something on the lines “to pay the policing contribution to LP on receipt of written confirmation from LP that it will use the contributions for the purposes identified in the schedule and that LP will only spend each contribution on a project with no more than 4 other contributions from Harborough District”</p> <p>Please keep me posted on the progress of the application, our objection and our contribution request. If no progress is made on this request please copy, verbatim, this letter and attachments into your report so that your members are fully aware of the Police objection and implications of the development for the Policing of the existing Harborough community. Please copy your draft report to me as soon as it is available prior to Member consideration and please include me in any circulation of s106 drafting.</p> <p>Best Regards</p> <p>Michael Lambert Growth and Design Officer Leicestershire Police michael.lambert@leicestershire.pnn.police.uk</p> <p>Without prejudice to any other obligation imposed upon it, it shall be the duty of each local authority to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area: Section 17(1) of the Crime and Disorder Act 1998.</p> <p>Comments to Appendix 3:</p> <p>Thank you very much for your consultation letter. I commented earlier on behalf of LP as attached. I have had no response to this. You will recall the Examination and Inspectors report on the Core Strategy and as then I am most keen to work with you to ensure that what is critical to the sustainability of growth you are proposing is included in the plan. We have met to look at planning obligations together and I am in regular contact with your planners in Melton’s development control team. I am concerned to see that what we have provided in good faith has transmuted into the content in your appendix 3 and Chapter 8. In the appendix Can you explain please why you describe what I have supplied which directly provides Policing to Melton as Forcewide?</p> <p>Can you explain please why the appendix says “item identified is transmitter provision cost only” when all that will be required is clearly evidenced and costed in my earlier submission. Can you explain please why the table says “all requires further investigation and relation with council tax precept” when what we have supplied already considers this. Further you will have seen from our regular contribution requests that we refer to our actual budget including Council tax precepts again demonstrating this position [I attach again</p>		
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		<p>for your further review] These are all matters considered in every planning appeal and what we, or any other service, requires would not be found necessary if we had the funds to pay for these additional infrastructures. You will also be aware, from our supply of these decisions on a number of occasions, of the importance that Inspectors and the SoS has attached to policing alongside, as distinct from, other local services. A High Court Judge in a JR has given the consumer view on adequate policing and additional development.</p> <p>Looking at what is accepted in relation to all other infrastructures why is such a caveat on revenue income not applied to any of these as it is to policing, even though we have demonstrated the point anyway? This seems to be pretty unfair to me. What equivalent evidence have you considered from other service providers please?</p> <p>In a similar vein can you explain why policing infrastructure has been described as essential rather than critical bearing in mind the link to the health and safety of communities in the NPPF para 69/70 and that crime, community safety and policing are planning considerations. What criteria is being used to make this differentiation and who has applied it using what evidence please? On the face of it this also seems unfair to me. I see that you attach the same urgency to community safety as you do allotments and some waste recycling. I don't think this is either reasonable or defensible.</p> <p>Response made 5.10.15: Melton Local Plan</p> <p>Infrastructure Schedule</p> <p>Policing Content at 2015</p> <p>Background Melton Borough Council are reviewing their Infrastructure Schedule to assist the preparation of their latest local plan. Leicestershire Police have supplied information about the impact of growth proposed in the District in the past and made representations as to the soundness of the last pre deposit draft of the Core Strategy in this respect. In offering these requirements police have born in mind past decisions of Inspectors and the SoS in planning Appeals and Examinations where this matter has been considered and the content of NPPF as regards plan making and decision taking and the timely delivery of necessary infrastructure.</p> <p>Growth proposed The District Council have confirmed that the growth will comprise a round figure of 5,000 additional dwellings to 2036 and they have applied a split of locations to accommodate this. Policing is an infrastructure delivered borough wide and our requirements have been calculated on this basis. Police will make requests in line with this calculation refined in response to each planning application.</p> <p>Working in Partnership The District Council recognises that growth of this scale will place additional demands on Policing and are committed to mitigate this through the Planning process by seeking developer contributions, making provision in infrastructure Plans for growth and in their deliberations in preparatory work on a Community Infrastructure Levy for the District. Police will co-operate fully to support the District Council through these mechanisms. We will keep our requirements under review and will implement additional infrastructure in</p>		
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		<p>accordance with s106 agreements or CIL infrastructure project lists. In the case of the latter we ask LPAs to make firm funding commitments in response to our needs at the time when CIL is proposed and to pass these funds to Police when received. We are advised that it would be perverse for LPAs to make their CIL case on the basis of our OAN and then not fund what is accepted as necessary as development commences.</p> <p>Policing Melton District Existing Policing demands of the District are probably best captured in our control room statistics. In 2013 we dealt with 34762 calls from the District. We sent emergency responses to 4401 of these. We sent further non emergency follow ups to 2588 of these. There were 1987 recorded crime incidents under Police attention in the District in the last year. There were 836 incidents of anti social behaviour in the District under Police attention in 2014. Additional to these incidents Neighbourhood Police presence and patrols were delivered by officers based in our premises at Melton.</p> <p>To deal with the existing Policing demands of the District of 21,500 households we currently deploy</p> <ul style="list-style-type: none"> • 63 staff at Melton police station providing neighbourhood policing and emergency responses.in the LPU station at Melton. The building is used to capacity by LP. • 2.5 staff in our BCU facility at Loughborough. This delivers investigations, intelligence, additional response Policing and management of the LPU function. The building is due for replacement in the Infrastructure Plan period because of its age and condition and will need to be extended to take additional growth proposed in Melton District. • 77 staff mainly at Force HQ Enderby delivering the following functions to the District - Criminal justice including courts case management and prisoner detention and processing, control centre/contact management, Intelligence research, Operations planning, dogs and firearms, special branch, forensic, Road Policing, Workshops/garages, Tactical Support Group, Road Safety Unit, IT and comms, Safeguarding/ vulnerability, Child abuse team, Economic crime team and Regional/major crime working. Included in this are staff in organisational support functions providing finance, human resources, welfare, estates, training and top level management of the Force. Premises to accommodate these staff are maintained at capacity use and all functions employ their own capital infrastructures eg in vehicle workshops and forensic labs. About half of all our staff work in uniform which in today's world includes personal radios, and personal safety equipment to deliver Policing in a range of situations. • 18 fully comms. equipped Police vehicles of varying types and functions. • Radio cover in the form of 9 base stations sufficient for the existing pattern of development and annual investment in hardware to ensure the capacity of this system at £8,000 pa • Police National Database availability and interrogation again with hardware costs to ensure this capacity of £5122 pa. The system is now at Planned capacity including dealing with 1720 hits pa as a result of Policing the existing communities of Melton. • In our control room we employ 11 staff to take and deploy responses to calls from Melton District. The control centre is maintained to capacity use however there are particular times when our telephony runs at capacity eg at weekends and evenings. • CCTV technologies including 3 ANPR cameras at strategic road locations in the district to detect crime related vehicle movements and 2 mobile units deployed with local partners to detect and deter crime at hotspots. • Hub access implementation with two beat drop in hubs already functioning in the District. 		
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		<p>Police Funding This is almost entirely revenue via Home office settlements and the precepted local rate base. The cost of our capital infrastructures has to be met from borrowing using these revenue incomes. The Policing priority is to maintain the front line of our service and so over 90% of our revenue expenditure is staff based. Because of this pattern of funding Police have for some time sought developer contributions where additional development will result in the need for additional investment in our capital infrastructures. Our capital programme [3 year period] is entirely related to maintaining our current level of capital infrastructures eg the size of our vehicle fleet, comms. and transmissions infrastructures and in relation to premises only dealing with existing known problems in our buildings. All of the capital items referred to in this paper are within capital streams in our capital programme and are dealt with as such by Police and the Home Office. There is no housing growth related growth element in our capital programme and our funding gives no basis to include this. Using our current capital programme as a guide we expect to spend £5,295,528 to maintain our infrastructures at the current level in Melton to 2036.</p> <p>Turning to our revenue income this has for many years barely been sufficient to cover our front line staffing costs even with rate base increases in band D as a result of housing growth. Our last budget was only balanced in the short to medium term because of the full utilisation of reserves. This is as a result of reductions in Home Office funding to the Police. All of the information on our asset deployment in this paper is accurate at the time of writing and is post recent staff and premises reductions. The case for Police funding through contributions from development is historic and not made as a result of the Comprehensive Spending Review. Financial strictures do however emphasise the importance of continuing to secure funds from this external source.</p> <p>Quantifying the impact of Growth on Police Capital Infrastructures.</p> <p>Forecast impact/increase in demand for Police service as a result of 5000 additional households in Melton equates to</p> <ul style="list-style-type: none"> • The employment and deployment of 33 additional staff. • 8 additional vehicles at £126,192 • Because radio cover is not provided to an in building signal strength north of Melton, the siting of an additional transmitter at £350,000*. • Additional investment in radio transmission capacity over a 5 year period at £9250 • Additional investment in PND capacity over 5 years £6000 • Additional investment in Control Room telephony of £21250 • Additional investment in 7 ANPR units to the District as a result of urban extensions and other major housing developments £57544[unit cost £8222] and 6 Mobile units to serve growth areas and their hinterlands £9,000 [unit cost £1500] • Investment in two additional Policing drop in hubs in the proposed SUE s and largest settlement after Bottesford. £16,000 • Start up and personal equipment for 33 additional staff £194,007 • Premises expenditure to cater for additional staff at £1,290,828. This will be used to expand the our existing premises which serve the district. <p>Premises information. Police are under considerable financial pressure to maintain our buildings in capacity use. We have in house estates functions able to do this including disposals when necessary and design and build on replacement premises, adaptations and extensions. The build costs used in forecasting premises spend are current and verified</p>	
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			<p>by Estates through tendering [£2794pm2]. Current occupancy rate across the force is 1 staff to 14m2. Occupancy in our Melton building is more intensive demonstrating the capacity issue identified. Forcwide premises are at our occupancy rate indicating that more staff will take this over capacity. Typical is the Control centre where 266 staff work to handle over a million calls per year from existing communities. It is fully occupied processing these.</p> <p>Conclusion</p> <p>Police are committed to work with the Council on the lines indicated in this paper however we can't plan to spend funds or develop and procure items without funds in our accounts. We are happy to take part in very long term planning however procurement will be triggered by actual growth on the ground reflected in planning applications. To serve the 5000 home growth anticipated by the Council over a 21 year period we will require £2,080,071 to procure the capital items indicated. These are entirely based on the levels of deployment to the existing Melton community. Without delivery of this additional infrastructure Policing to this existing community will be adversely impacted.</p> <p>*I have included this element as the need was identified in the last submissions we made back in 2012. I am asking colleagues to re visit this and will advise in due course if this element needs to be changed.</p>		
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