

Dear Joann

**RE: Planning Application – Land at Winnycroft Farm Matson 420 units
Ref 14/01063/OUT**

I write on behalf the Office of the Police and Crime Commissioner for Gloucestershire (OPCC Gloucestershire) and Gloucestershire Constabulary in connection with the above planning application for the erection of up to 420 dwellings and community space / building as well as associated landscaping, public open space, access, drainage, infrastructure, earthworks and other ancillary enabling works on land South Of Winnycroft Farm, Corncroft Lane Gloucester GL4 6BX.

This proposed development will impact on local policing provided by the Constabulary and will require mitigations to OPCC Gloucestershire's capital facilities.

To address these points, this letter sets out a request for an appropriate level of developer contribution with supporting information to justify how the requested developer contribution has been arrived at in line with relevant planning guidance.

A total policing contribution of £142,196.32 is requested in this instance.

The nature of the development

The application seeks to build on land at the southerly boundary of Gloucester City between Winneycroft Lane to the North and the M5 motorway to the south. The application is for 420 family homes and associated infrastructure on what is currently open land.

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 Tri Service control room are monitored and can give an indication of the level of services in different areas such as the 52,700 households in the Gloucester local policing area.

In 2013 we dealt with 67,796 emergency calls across the County and 311,270 non emergency calls. In the Gloucester local policing area (LPA) 43,156 calls were handled 8,055 emergency calls and 35,101 non emergency calls.

The Gloucester local policing area dealt with 9,964 crimes and 8,691 incidents of Anti Social Behaviour in 2013.

Perhaps a further demonstration of response to demand is the regular patrolling of the locality and local community contact maintained by the Neighbourhood Policing teams located at Barton Street Police Station.

Current levels of deployment and infrastructures to Gloucester District.

Staff delivering Policing to the locality are spread across the following functions:

- 232 in the Gloucester LPA providing Neighbourhood Policing and emergency responses to the Gloucester District.
- 26 staff in the Tri Service Control Centre at Waterwells delivering additional response Policing and LPA contact management.
- 75 staff in delivery teams mainly at our sites at Waterwells and the Operations centre at Bamfurlong - 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, information technology and communications, child protection team and in regional/major crime working.

77 staff, in organisational support functions, at Police HQ and our training unit at Waterwells providing finance, human resources, welfare, estates, training and top level management of the Force.

24 police staff are employed to provide direct support to policing the Gloucester LPA.

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 434 staff equivalent

employed to deliver Policing to the Gloucester local policing area. Policing an existing development of this size would occupy the time of 3.45 existing members of Police 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 of the scale proposed.

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 across the Gloucester local policing area. 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.

Personal equipment for staff comprising workstations, protective equipment, uniforms and bespoke training in the use of these. 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.

Police vehicles of varying types and functions covering existing patterns of development and community demand. The 415 vehicle fully equipped fleet is kept at a level to meet existing patterns of demand from the County with reductions made whenever possible. Vehicles are used by staff on patrol, deployed to deal with emergency responses and for follow up of recorded crimes eg by Scene of Crimes Officers. There is no capacity in this deployment for increases to meet the demands of growth.

Police National Database The availability and interrogation with hardware costs to ensure our current capacity costs an average of £165,420 pa. It

costs an additional £5,000 to replace the servers every 5 years. The system will require additional capacity as the County expands. Planned capacity is the number of hits and associated data storage and interrogation that the current system is capable of accommodating and is established each time hardware is added.

Control room telephony We employ 156 staff to take and deploy responses to calls across the County. The control centre is maintained to capacity use and there are particular times when our telephony system runs close to overload due to the sheer number of calls at peak points of Policing demand. e.g. at weekends and evenings

Automated Number Plate Recognition (ANPR) is an essential tool in the management and investigation of crime, from crime prevention & reduction to the protection of our national security. The County of Gloucestershire has had ANPR technology since 2006 in Gloucester City. This technology assists the Constabulary in being able to detect and deter crime by enabling actions to be taken against those who may be involved in criminality using motor vehicles on the counties road networks.

Automatic Number Plate Recognition (ANPR) technology is used to help detect, deter and disrupt criminality at a local, force, regional and national level. Searches of ANPR data can confirm whether vehicles associated with a known criminal has been in the area at the time of a crime and can dramatically speed up investigations.

All the ANPR cameras are fed into a back Office facility which is monitored 24 hours a day by the Force control room.

Policing points are already functioning across the county. These are established where partners offer premises at a reduced or nil cost and are used to cover the existing pattern and size of development in that location. They need to be equipped and where additional development is proposed with increases in demand for this deployment we seek developer contributions for equipment and local crime initiatives.

Premises sufficient to accommodate the staff and services outlined above in Gloucester local policing area and beyond and particularly at Police Headquarters, Waterwells. The Force has 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. Our asset management programme identifies and costs the requirement to refurbish, extend and replace premises. It does not take into account the predicted growth of some 90,000 houses in the next 10 to 20 years.

Other capital infrastructures such as mobile data, upgrades to IT and data recording also require additional funding.

Why we seek Contributions

A primary issue for Gloucestershire 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 90% of our budget is staffing related, our capital programme can only be used to overcome pressing issues with our existing facilities eg the new custody facility, technological replacements and upgrades 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.

Faced with unprecedented levels of growth being proposed across our county Gloucestershire 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.

The Policing impact of 420 additional houses at the site.

The proposed development will increase the population of this settlement by at least 1008 people. It is a fact that 420 new houses will bring additional Policing demands and particularly as there is no Policing demand from what is currently open fields. 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 and intervention as they go about their daily lives at the site, in the town and across the County.

Empirical data indicates the direct and additional impacts of the development on local Policing that will be manifested in demand and responses in the following areas-

- At least 344 additional calls and responses per year via our control centre.
- Attendance to at least an additional 64 emergency events as a result of the proposed development each year.
- At least 280 non emergency events to follow up with public contact as a result of the proposed development each year.
- 79 additional recorded crimes as a result of the development per year based on LPA crime and household data. In addition at least 69 recorded anti social behaviour incidents each year as a result of the development.
- The demand for increased patrol cover.
- Additional demand for access to beat staff from the Gloucester Local Policing units.

- 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.

Planning Policy justifications for a Policing contribution

National Policy

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 healthy and inclusive environments where crime and disorder and the fear of crime do not undermine the quality of life [69].

The key statutory tests for the use of Section 106 Agreements are set out in R122(2) of the CIL regulations 2010 and echoed in paragraph 204 of the NPPF March 2012. This regulation introduced into law three tests for planning obligations. Obligations should be:-

- necessary to make the development acceptable in planning terms
- directly related to the development
- fairly and reasonably related in scale and kind to the development

These tests are applied below to all elements of the policing contributions request set out in this letter.

Local Policy

The adopted Local Plan for Gloucester City remains the saved policies of the 1983 Gloucester City Local Plan, but this historic plan will shortly be superseded by the emerging Joint Core Strategy and in due course the Gloucester City Plan.

Although the Joint Core Strategy is not yet adopted, it has reached an advanced stage in its preparation and is expected to be submitted to Government in mid November 2014, following which it will carry significant weight.

The Joint Core Strategy Pre-Submission Document June 2014 policy on infrastructure delivery policy INF 7 includes safety and security including emergency services at paragraph 2. xi:-

"1. Where need is generated as a result of individual site proposals and/or as a consequence of cumulative impact, new development will be served and supported by adequate and appropriate on- and/or off-site infrastructure and services. In identifying infrastructure requirements, development proposals will also demonstrate that full regard has been given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan.

2. Where need for additional infrastructure and services and/or impacts on existing infrastructure and services is expected to arise, the local planning authority will seek to secure appropriate and proportionate infrastructure provision in respect of:

- i. Affordable housing*
- ii. Climate change mitigation/adaptation*
- iii. Community facilities*
- iv. Early Years and Education*
- v. Health and well-being facilities*
- vi. The highway network, traffic management, sustainable transport and disabled people's access*
- vii. Protection of cultural and heritage assets and the potential for their enhancement*
- viii. Protection of environmental assets and the potential for their enhancement*
- ix. Provision of Green Infrastructure including open space*
- x. Public realm, and*

xi. Safety and security including emergency services.

This list is neither exhaustive nor are its elements mutually exclusive.

3. Priority for provision will be assessed both on a site-by-site basis and having regard to the mitigation of cumulative impact, together with implementation of the JCS Infrastructure Delivery Plan.”

The Police and Crime Commissioner for Gloucestershire has participated fully in the Joint Core Strategy Infrastructure Delivery Plan process, having submitted representations at all consultation stages to ARUP. This is resulted in the inclusion of our infrastructure requirements in the Joint Core Strategy Infrastructure Delivery Plan main report issued in October 2013 and Executive Summary June 2014.

The Police and Crime Commissioner for Gloucestershire has also made representations on the emerging Gloucester City Plan during all consultation stages, but it is at a less advanced stage of preparation than the Joint Core Strategy.

Developer Obligations towards Police Infrastructure

On the basis that an increase in population arising from the development proposals would impact on the ability of the Police to deliver an effective and efficient service, it is reasonable that developers contribute towards mitigating these impacts via Planning Obligations. In the Association of Chief Police Officers guidance from Ian Dove QC infrastructure is defined :-

“The first point to note is that “infrastructure” is not a narrowly defined term. Section 216 of the Planning Act 2008 provides a list of “infrastructure” but is clear that that list is non-exhaustive. That fact is demonstrated by the use of the word “includes” prior to the list being set out. In my view there is no difficulty in the proposition that contributions towards Police infrastructure can be within the definition of infrastructure for the purposes of the 2008 Act. In policy terms this is reinforced by the reference to security infrastructure in paragraph 156 of the National Planning Policy Framework.

Furthermore infrastructure is of course not limited to buildings. In the context of the police’s infrastructure the kind of items which could be included have been provided in my instructions and includes equipment such as vehicles and

bicycles, communications technology and surveillance infrastructure such as CCTV equipment.”

Planning Precedents

In our Force area we have a precedent set in the recent application for planning on land at Perrybrook, Brockworth.

Paragraph 17.17 states that

“the scheme would make provision for a safe lockable office/room for the police service to use at Brockworth. In light of that commitment the applicants are happy to either make provision for such a facility or make the financial contribution requested by Gloucestershire Constabulary. It is considered that such an obligation would be CIL compliant and could be secured by way of a Section 106 agreement.”

In other Force areas precedents have been set by the rulings of planning inspectors. I have consulted with colleagues in other Forces and have the following examples:-

Land South of Hallbrook Primary School 111 dwellings

Application Ref 12/04597/OUT Appeal Ref APP/F2415/A/12/2183653

The Secretary of State overturned the Inspectors decision to allow an appeal but agreed with the Inspector that a police contribution as part of a package of S106 contributions were necessary to make the proposal acceptable in planning terms and accord with the 2010 CIL regulations 122 tests and the paragraph 204 NPPF tests.

Appeal A – land East of Springwell Lane, Whetstone 150 dwellings

Appeal A: APP/T2405/A/13/2193758

The Inspector was satisfied that the Police contribution was necessary to make the development acceptable in planning terms.

Ashby de la Zouche, South of Moira Road – 69 dwellings

Appeal Ref: APP/G2435/A/13/2192131

£24,903 towards the costs of policing the development – the Inspector found that this complied with paragraph 203 of the NPPF and met the test of regulation 122 CIL regulations 2010.

Land North of Bill Crane Way, Whetstone – 150 dwellings

Appeal Ref: APP/F2415/A/12/2179844

A unilateral undertaking including a policing contribution. The Inspector found that the policing contribution of £426 per dwelling was necessary to make the development acceptable in planning terms, even though additional staff, accommodation, vehicles and equipment were not for the exclusive use of the development.

Rearsby Roses, East Goscote – 60 dwellings

Appeal Ref: APP/X2410/A/12/2187470

£25,000 policing contribution found to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind.

Melton Road, Barrow upon Soar 300 dwellings

APPLICATION REF: P/10/1518/2

The Secretary of State's decision supporting the Inspector's decision to grant planning permission and a policing contribution of £177,255. The Inspector and the Secretary of State endorsed that this request for a policing contribution of £590 per dwelling met the CIL tests. Please note paragraphs 291 and 292 of the Inspector's report.

Seine Lane/Forest Road, Enderby 244 dwellings

Appeal Ref: APP/T2405/A/13/2200867

Appeal dismissed application for maximum of 200 homes, but policing contribution met CIL tests.

Mount Sorrel Lane, Rothsey 250 dwellings (as reduced)

Appeal ref: P/12/2005/2 and P/12/2456/2

Appeal A – 250 dwellings. The Secretary of State's decision agreed with the Inspector's recommendation to allow an appeal. Both confirmed that the unilateral S106 agreement including a policing contribution of £106,978 (£427 per dwelling) met CIL regulation 122 tests

Rugby Radio site – urban extension of 6200 homes plus a significant amount of other related development. Planning committee resolution 8th January 2014. Resolution to grant planning permission subject to draft S106 heads of terms including a policing contribution of £1,237,000, with a Safer Neighbourhood Team office contribution of £500,000.

Copies of all of the above are attached as appendices

The Police contribution request

A total contribution request of **£142, 196.32** 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 proposed. We anticipate using rate 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).

Police expect to agree a programme to procure these additional facilities and have no difficulty including this as a clause in a legal agreement. We are committed to procure these items subject to the contribution sought. Contributions are only sought that are related in scale and kind to the development and so some infrastructures will not be entirely funded as a result. Police will pay the remaining amount if no other developers contribute towards Policing in the Gloucester area. This will mean that funds will have to be diverted away from other areas of deployment whilst seeking to maintain our priority as far as front line Policing is concerned.

As a further justification of our request, we confirm that the contribution 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 and there is no more reliable comparators than those used in this request.

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 2010 when Gloucestershire 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 additional impacts they cause.

Because of the very serious implications for Policing of major developments, like this one, Police nationally have taken advice about the best way to proceed in the transition period prior to the CIL regime. As a result Gloucestershire Police no longer make requests based on a formula but solely in relation to the development under consideration; its direct impacts on Policing and the necessary mitigations that it should provide.

What follows is a detailed explanation of Methodologies used to calculate the contribution and our application of the NPPF tests to justify each part.

Mitigation of impacts and methodologies identified by Gloucestershire Police

Baseline background. At October 2012 total floor space occupied by the Force to deliver Policing to this County was 32409 m². We employed 1,199 police officers and 132 PCSOs and 633 police staff to do this.

Existing households in the County (2011 census) 52,700 (2009/10) in Gloucester local policing area (LPA).

204 police officers and 28 PCSOs delivered policing services in Gloucester LPA.

24 police staff supported delivery of policing services to the Gloucester LPA.

Households to staff for Gloucester is 122:1

Floorspace to staff Forcewide is 16.78 m2.

Equipping staff.

Additional staff needed to Police the development will require additional equipment.

For a Police Officer the additional equipment items are uniform £898, Workstation £1186, IPLDP probationers induction training £5854. Uniformed officers work in shifts where workstations can be shared and as a result start up cost will be £8422 per uniformed officer.

For other staff the additional equipment items are workstation £1853 and training £300, total £2153.

The average cost of employing and equipping a new member of police staff is £3688.

Because the development is forecast to generate the need to employ 3.45 additional members of staff the contribution for equipment should be **£20,895** from this new development. (Based the average cost of equipping a member of staff - 8422+3688 -: 2 X 3.45)

The Force could not have officers attending this development with less than adequate equipment with un-necessary risks to themselves and occupiers served.

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.

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.

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. Demand and mitigations have been determined by the scale of the development.

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 the Gloucester area is 38 vehicles serving 52,700 existing households. The average equipped cost of a vehicle is £17,300. We replace vehicles on average every 4 years and although there is some resale value it is minimal. Based on this existing level of deployment to the locality we forecast additional demands as a result of this application.

38 units (vehicles at value £657,400

Existing households Gloucester 52,700 = £12.15 per H hold

In relation to this particular development additional vehicle costs to deliver Policing and meet community safety needs will be **£5,104**. This will be required when the cycle of replacement in the Gloucester area and the building of the new development coincide. 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.

Is the contribution necessary to make the development acceptable in planning terms?

Use of vehicles is fundamental to deliver community safety and address crime especially at Neighbourhood level.

Is it directly related to the development?

Fleet deployment is related to the known Policing demands of comparable development in the locality. The direct 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.

Is the contribution fairly and reasonably related in scale and kind to the development?

This is a residential development and the Police vehicle demands it will generate are known by comparison with deployment to other local residential development. Level of demand and mitigations have been determined by the scale of the development and demonstrate only a proportion of a vehicles' time will be spent policing it. We do not therefore seek the cost of a whole vehicle.

Police Database capacity. 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.

Dedicated hardware is used with our contribution to this at £165,420 per annum. In addition, local servers are replaced every 5 years at £5k

To serve the existing households in the Gloucester district costs £0.53 per household per year. An additional 420 houses equates to £221 per annum

We require a one off cost of **£221** to increase capacity. 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.

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.

Is it directly related to the development?

The additional demands of this development in relation to this infrastructure have been identified as have mitigations.

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 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.

Control Room telephony Police control room call handling equipment is used to capacity at peak times. Our call handling centre at Waterwells 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 new development. In order to deal with all our calls across the County telephony, lines and licenses are required at a total cost of £ 22,530 per year. This currently cost 8 p per household.

The proposed 420 additional houses in the Local Policing Area are forecast to generate 344 additional calls per year. We request a one off contribution of **£35.32** to pay for additional lines and licences.

There will be a call handling impact and delays in response times if we attempt to serve this development with our current telephony systems.

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.

Is it directly related to the development?

The additional demands of this development in relation to this infrastructure have been identified as have mitigations.

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.

ANPR CCTV Deployment These cameras are server linked to identify number plates of vehicles in use for crime. Recent public consultation saw significant support for the extension of this intelligence led solution to counter both local and travelling criminality impacting on the communities of Gloucestershire. There are plans to extend coverage of this technology initially in to Cheltenham and subsequently throughout the county.

Expansion of this system should be considered in conjunction with any new or planned development, enabling the Constabulary to put the right resource at the right place against the right risk and providing the opportunity for detections to become less resource intensive.

We will install these as resources permit however our financially constrained programme makes no provision for the impacts of additional areas of housing.

Unit cost is £9,000 which includes installation and APN links. There will be an annual running cost £2,484 per year for data from O2 and our managed provider Wireless logic.

The cameras at the following positions would be covered under this section 106 application.

- B 4073 Painswick Road/Upton Hill

A contribution of **£11,484** is requested.

Is the contribution necessary to make the development acceptable in planning terms?

Deployment of CCTV technologies significantly increases detection and deterrence with reduced need for staff presence and particularly contributes towards achieving community safety at neighbourhood level. 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 network gaps.

Is it directly related to the development?

The additional demands of this development in relation to this infrastructure have been identified as have mitigations. 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.

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.

Premises Within the Gloucester local policing areas Neighbourhood Policing is delivered from premises at Bearland and Barton Street. 3.45 additional members

of 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 (15.6m²) x number of staff generated by the development (3.45) x Build and build cost (£1,900m²) giving a total of **£102,037** from this development. The latter is the build cost in use by Force Estates and has been externally verified by consultants.

This will be a contribution towards the building works required to upgrade our response facility. Gloucestershire Police own the freeholds of these buildings and have in house expertise able to deliver property projects.

In relation to premises our Asset Management Strategy proposals maximize the use of our estate and some premises require refurbishment and upgrade. This programme does not take into account the predicted growth and our requirements across the County to deliver policing as demand increases. It is estimated that some 90,000 new dwellings will be built over the next 10 to 20 years.

Clearly we will be unable to fund any required growth without contributions and our future provision of infrastructure will be severely restricted.

Our infrastructure requirements were made clear in the Joint Core Strategy IDP main report issued in October 2013.

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 this is to be achieved.

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 between the development,

additional staffing and accommodation is demonstrated and it is appropriate to mitigate this through the planning system.

Is the contribution fairly and reasonably related in scale and kind to the development?

This is a residential development and the accommodation needs of staff delivering Policing to meet local demands of development of this nature are known. It is based on the scale and kind of residential development.

Additional Equipment for policing point serving the locality. This new development will increase the demand for local accessibility to Policing. Police are delivering policing points to existing communities and have a model for these reflected in current provision to serve existing residents from Parish Council offices, libraries and similar premises. The provision room in a community hub is requested and in addition a contribution of £2000 to equip it with the necessary mobile information technology functionality.

In association with this policing point Police expect to meet the demand for additional local crime initiatives as a result of new development. We have restricted funds to deliver crime prevention initiatives to existing and new development which pays for equipment such as Smartwater kits(fluid, sprays, detectors) or signage for local occupiers to use. We request that the developer contribute £1 per new unit towards the cost of these initiatives. A smartwater kit for example costs £16.

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.

Is it directly related to the development?

The use of a room in the community hub as a local policing point and a proportionate contribution towards equipment there is sought.

Is the contribution fairly and reasonably related in scale and kind to the development?

This is a residential development and accessibility to beat Policing for residents is an increasing part of the service. More policing points 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 and is proportional.

SUMMARY OF CONTRIBUTION REQUESTED

Start up equipment	£ 20,895
Vehicles	£ 5,104
PND additions	£ 221
Additional call handling	£ 35.32
ANPR	£ 11,484
Additional premises	£ 102,037
Policing point equipment	£ 2,420
Total	£ 142,196.32

Conclusion

Without the necessary contribution the development will be unacceptable in planning terms and permission should not be granted as indicated in NPPF Guidance. The 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 the parish, settlement, 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.

I am happy to provide a phased payment approach to the contributions on the understanding that our total funding request is agreed under the S106 terms when planning permission is granted. However I am unable to estimate when funding will be required until we have established the phasing of your build. Therefore I believe this needs to be discussed and I would welcome the opportunity to meet with you to clarify any of the issues of developer contributions towards necessary Police infrastructure prior to determination of the planning application.

I would be grateful if you could contact me as soon as possible following receipt of the letter, but in the meantime should you have any queries, please do not hesitate to contact me.

Secured By Design

Please be aware that these representations are prepared on behalf of the Office of the Police and Crime Commissioner for Gloucestershire to seek developer obligations towards Police infrastructure. Separate representations may be submitted by the Crime Prevention Design Adviser Mark Murphy in respect of crime prevention environmental design/compliance with Secured By Design principles.

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.

The Police service have produced a guide called "Design and Access Statements how to use them to prevent crime" and it can be accessed at this weblink.

<http://www.securedbydesign.com/pdfs/Design%20and%20Access%20Statements%20-%20How%20to%20use%20them.pdf>



14-04-08 3-in-1
Mountsorrel Lane Chz



14-04-17 3-in-1
Crowfoot Way Harbo



Appeal decision
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Appeal
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Mandy Gibbs

Facilities and Environmental Manager MILM
Gloucestershire Constabulary

Police Headquarters, 1 Waterwells Drive, Quedgeley GL2 2AN



CC Mark Murphy