WYG Planning & Environment
part of the **WYG** group

Ref: DA/RW/A066406-14

6th November 2013

Planning Policy
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire B60 1AA

E-mail: strategicplanning@bromsgrove.gov.uk

Dear Sir or Madam

Bromsgrove District Plan Proposed Submission Version 2011-2030
Bromsgrove Draft Infrastructure Delivery Plan – September 2013

WYG is instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the infrastructure aspects of the above consultation documents. We understand that separate representations will be made by WMPCC relating to other matters affecting policing.

West Mercia Police (WMP) submitted representations previously on the Bromsgrove District Council Draft Core Strategy in 2011 and WYG submitted representations by letter of 15th May 2013 to the Joint Redditch and Bromsgrove Housing Growth Consultation.

This representation updates the representation of 15th May 2013; however much of the information provided in that letter remains unchanged and we are therefore appending that letter for ease of reference.

The May 2013 letter made it clear that WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in Bromsgrove, including development proposed to meet Redditch related growth requirements. The information provided in that letter on WMP's financial position (see the section on WMPCC's Interim Statement) outlines the financial constraints within which WMP continues to operate.

The May 2013 letter also noted that WMP has been instructed WYG to prepare a Strategic Infrastructure Assessment (SIA) that will provide detailed evidence of WMP's Infrastructure requirements. It has now been decided in view of the significant cross border implications for policing, that rather than producing separate SIAs for Bromsgrove and Redditch, a single overarching SIA will be produced covering infrastructure requirements for both Bromsgrove District and Redditch Borough. However infrastructure costs will be apportioned between the two districts in proportion to the growth strategies of each authority. When completed, the SIA will inform the Infrastructure Delivery Plans being prepared by the two authorities.

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Bromsgrove District Plan Proposed Submission Version 2011-2030

89/1 Draft Policy BDP3

This Policy sets out development targets for housing and employment growth and provides for 7,000 dwellings to be provided in the district to meet development needs within the plan period, with a further 3,400 dwellings to be provided on land adjacent to the administrative boundary with Redditch Borough to meet the growth needs of Redditch that cannot be accommodated within its own administrative area.

Growth of this scale will impact significantly on policing requirements and this will be addressed in the forthcoming SIA. The targets set out in BDP3 will be used in the SIA to determine the additional infrastructure requirements and costs for WMP as a result of the proposed growth.

89/2 Draft Policy BDP6

The Policy addresses the need for infrastructure contributions to be co-ordinated to ensure that growth is supported by the provision of infrastructure, facilities and service. No definition is provided for infrastructure although reference is made to the Infrastructure Delivery Plan.

For WMP, infrastructure includes:

- buildings and accommodation
- personnel set-up costs
- vehicles and other operational equipment, and
- central support services including personnel in operational support, human resources and corporate services

The forthcoming SIA will provide evidence of how the growth proposed in the Bromsgrove District Plan will impact on WMPs infrastructure needs and provide a costed breakdown of the infrastructure required to support this growth.

We note the Policy indicates that contributions towards infrastructure will be secured through a Community Infrastructure Levy (CIL). We look forward in due course to contributing to discussions and consultations on CIL.

89/3 Draft Policy BDP12

The Policy relates to the provision of services and facilities to meet the needs of the community. The policy cross-refers to BDP6 and notes that new developments that add to requirements for infrastructure and services will be expected to contribute to the provision of necessary improvements.

Policing provision is a fundamental component of sustainable communities and, while this is not explicit in the policy, we note that paragraph 8.135 includes "emergency safety (including the emergency services)" under the umbrella of essential community facilities. Whilst we assume that this is intended to cover in a general sense police, fire and ambulance provision, it would be helpful if the paragraph set this out more fully to make it clear that WMP's remit is not confined to provision of an emergency service.

Bromsgrove Draft Infrastructure Delivery Plan – September 2013 (IDP)

We note that this is a live document which will be updated as and when infrastructure requirements are clarified. When completed the SIA will inform the IDP to provide a more comprehensive picture of WMP's growth related infrastructure requirements.

89/2 Appendix A Page 39 of the IDP lists some of the types of infrastructure that WMP will require to ensure that growth is supported by the necessary police resources. We appreciate this list is not necessarily intended to be fully inclusive of the types of infrastructure that WMP may require; however, the summary above provides a short guide that might usefully be included.

89/4 Appendix B, Infrastructure Delivery Schedules under the heading Emergency Services includes reference to the Bromsgrove Joint Police and Fire Station. Until the SIA is available, it is not possible to identify additional items of infrastructure that will need needed as a result of the Bromsgrove District Plan's growth proposals. Unfortunately production of the SIA has been delayed. However, we anticipate it will be available later this year. However as an interim measure we request that the categories of infrastructure identified above are included in this schedule i.e.:

- buildings and accommodation
- personnel set-up costs
- vehicles and other operational equipment, and
- central support services including personnel in operational support, human resources and corporate services

You may be aware that the draft Redditch IDP has adopted this approach.

We will keep you informed on progress with the SIA. In the meantime, if you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

[redacted]

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Ref: DA/JL/A066406-14

15th May 2013

Development Plans
Redditch Borough Council
Walter Stranz Square
Redditch
B98 8AH

Planning Policy
Bromsgrove District Council
The Council House
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Bromsgrove
Worcestershire B60 1AA

Email: consultplanning@bromsgroveandredditch.gov.uk

Dear Sir or Madam

DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO. 4

BOROUGH OF REDDITCH DRAFT INFRASTRUCTURE DELIVERY PLAN REPORT – MARCH 2013

JOINT REDDITCH AND BROMSGROVE HOUSING GROWTH CONSULTATION

We are instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the above consultation documents. West Mercia Police (WMP) has submitted representations previously on Redditch's Preferred Draft Core Strategy in 2011.

WMP is one of the key infrastructure providers in Redditch Borough and Bromsgrove District. The Borough of Redditch Draft Infrastructure Delivery Plan Report (March 2013) (p.38 and 39) lists the police infrastructure required to serve the planned growth in the Borough.

We are now in a position to update the Council on the police infrastructure required to support the spatial planning strategy set out in the emerging Redditch Local Plan.

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As you may be aware, it was previously proposed by West Mercia Police and Hereford & Worcester Fire and Rescue Service in 2011 to develop two new joint police and fire stations; one in Bromsgrove and one in Redditch (Worcestershire Needs and Issues Document, 2012). Unfortunately, following further feasibility work, this is no longer an adequate solution for Redditch due to the differing operational requirements of the two emergency services. The planning and delivery of any new facilities in the Borough will proceed independently.

The existing police station at Redditch was constructed in the 1970s and is no longer fit for purpose. The anticipated increase of over 3,000 dwellings (6,400 dwellings, to include the cross boundary growth in Bromsgrove) will impact significantly upon the operation of the police station resulting in the need for additional infrastructure. Consequently, the intention now is for WMP to dispose of Redditch Police Station with some of proceeds being put towards the cost of a new larger Police Station. The custody facility at Redditch will be closed and alternative services provided at Kidderminster for the medium term until the new Redditch station is completed, at which point it is likely that custody will have to be re-provided at Redditch as a result of the population and household growth. Indeed, the expansion of the police station facility is necessitated, chiefly, by the planned population and household growth. Whilst detailed plans have yet to be formulated, a proportion of the cost of the new Police Station therefore, can be quite reasonably attributed to growth, justifying funding of this longer term project through planning contributions and the Community Infrastructure Levy.

The new Bromsgrove Police and Fire Station has the capacity to address the anticipated growth within the District, apart from the projected increase in population as a result of the Redditch urban extension. The new Redditch Police Station will deliver services to the urban extension as well as to the existing Redditch Borough. The urban extension comprises approximately 3,400 dwellings, currently proposed to be sited at Foxlydiate and Brockhill East, and being Redditch related development (albeit in the District of Bromsgrove) is best served by the new Redditch Police Station.

In response to the Councils' forthcoming consultations on the CIL charging schedules, WMP has instructed WYG to provide detailed evidence setting out WMP's infrastructure requirements for the plan period for each local authority. This will be in the form of a Strategic Infrastructure Assessment (SIA).

The SIA will provide evidence of the infrastructure requirements of WMP which will be needed to ensure policing services continue to be delivered to an acceptable standard in response to anticipated growth. Due to the differing stages of Local Plan preparation, individual SIAs will be produced for each LPA,

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although reference will be made to the linkages between the two authorities, in respect of the cross-boundary housing growth proposals.

The Redditch SIA is in the initial stages of preparation and cannot be completed until the Joint Estates Strategy and Local Policing Plans are adopted. You will no doubt be aware that the Local Policing Plans, which have been well reported by the local press, will set out the new approach to local policing in West Mercia. They will include details of the basing of Safer Neighbourhood Teams, the stations to be kept and those which it is proposed should be closed and the buildings/sites disposed of. A full SIA covering the growth in Redditch and the Redditch related development in Bromsgrove is expected to be complete by the time the Submission Local Plan is published for consultation (August/September 2013), and indeed when the next iteration of the Infrastructure Delivery Plan is published. It is intended that the SIA will be updated periodically to reflect changes in WMP's service delivery, the outcomes of which will feed into the Councils' Infrastructure List, a 'live document'.

We welcome the inclusion of policing within the Council's definition of infrastructure, as set out in the Borough of Redditch Draft Infrastructure Delivery Plan Report (2013). The need to adequately consider the need for additional policing infrastructure is integral to the production of a sound Development Plan. As a case in point, the Melton Core Strategy was recently withdrawn following the Planning Inspector's comments that the document would be unsound due to a number of matters of fundamental concern. One of the Inspector's concerns centred on the fact that the requirements set out within Melton Council's Infrastructure Delivery Plan were not adequate to meet the Leicestershire Police's infrastructure requirements. The inspector cited that the Core Strategy was in conflict with paragraph 182 of the NPPF which states that plans *"should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements".*

Nevertheless, it should be noted that police infrastructure is not a narrowly defined term and is not limited to buildings. The Association of Chief Police Officers (ACPO) has taken legal advice from Ian Dove QC and this supports this contention (see paragraph 6 of the advice). Infrastructure can include equipment, which might, for example, include vehicles, communications technology and surveillance equipment. It is also legitimate to include the set up costs for new staff covering recruitment, training, uniform and personal equipment and this will pertain equally under the forthcoming CIL regime. Both the Council's IDP and the Worcestershire Infrastructure Strategy refer to the number of additional police officers required as a result of planned population and household growth. We therefore ask that reference is made also within the IDP to the costs of equipment and staff set-up costs for new personnel required to serve the identified growth. The SIA will be based on this definition of infrastructure when assessing infrastructure needs of the district.

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I have set out below information on the recent changes affecting WMP which will provide some further background to WMP's approach to policing of existing development and the points made above:

OVERVIEW OF RECENT CHANGES AFFECTING WMP

Election of the Police and Crime Commissioner

Since the previous consultations, the West Mercia Police Authority has been replaced as the body responsible for overseeing policing in West Mercia by the WMPCC, Bill Longmore, who now has responsibility for policing and crime in the West Mercia force area. The WMPCC will also set the budget for the force with effect from April 2013. The WMPCC is subject to scrutiny by the West Mercia Police and Crime Panel (WMPCP), which comprises fifteen members of the local authorities across the force area, together with two independent members.

Police and Crime Plan

It is a legal requirement that the WMPCC produces a Police and Crime Plan and this is subject to public consultation. The first Police and Crime Plan for West Mercia was adopted on 1st April 2013 and sets out objectives and priorities for the period from 1st April 2013 to 31st March 2017. The Police and Crime Plan sets out Mr Longmore's priorities that will form the framework within which the Chief Constable will deploy resources. This also includes further information on a Medium Term Financial Plan and the 2012/2014 Budget.

The WMPCC states that he is anxious to preserve so far as resources allow, the visibility and availability of front line Police services. He notes that the alliance with Warwickshire Police brings opportunities for introducing new processes and reducing duplication across the combined area whilst maintaining service levels with fewer personnel. The WMPCC emphasises the role of support services which, as he points out, are not front line in the ordinary sense, but are absolutely vital to allow the front line to operate effectively.

One of the objectives of the Police and Crime Plan is to provide effective neighbourhood policing. In West Mercia, local policing teams, soon to be known as 'safer neighbourhood teams', made up of local policing officers, community support officers (CSOs) and special constables work with the community to tackle local crime and disorder problems, improve the environment, and provide reassurance to all residents.

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The strategic sites, split site urban extension and other major developments proposed in Redditch Borough and Bromsgrove District will require neighbourhood policing to be embedded along with other infrastructure at the outset, and the SIA will set out the requirements and costs associated with this provision.

Under the provisions of the Police Reform and Social Responsibility Act 2011, the Police and Crime Commissioner is required to secure an efficient and effective police force [Part 1, section 1, subsection (5) (c)]. The provision of the necessary infrastructure is consequently essential in order to fulfil this duty.

WMPCC's Interim Statement

The WMPCC also issued an Interim Statement (1st February 2012). This advises that he proposes to recommend to the WMPCP a freeze on the police precept for 2013/14. At its meeting on 6th February, the WMPCP accepted Mr Longmore's recommendation and the freeze on the 2012/14 precept was confirmed.

The Interim Statement also advises of the WMPCP's intention to make use of reserves in the next financial year, and over the following three years. However, as the WMPCC acknowledges, the use of reserves cannot provide a long term solution and further spending reductions will be required. The WMPCC envisages a real terms reduction of £20m in police expenditure by 2015/16.

A key to achieving this reduction will be the on-going restructure of policing across West Mercia, particularly affecting the back-up and support services. These services will in future be provided more economically in alliance with Warwickshire Police (see below).

It is clear from the above that WMP's ability to provide the additional infrastructure identified as being necessary to support the development growth proposed across the Borough and District will be dependent upon securing funding via developer contributions and/or CIL.

Progress with the Strategic Alliance with Warwickshire Police

Joint working between WMP and Warwickshire Police as part of the Strategic Alliance is ongoing in order to secure efficiencies whilst at the same time maintaining front line services. A joint Estates Strategy is currently being prepared and an announcement is expected in the near future. When further information becomes available, we will advise you of any implications for WMP in terms of infrastructure and other related matters.

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CONCLUSIONS ON RECENT CHANGES AFFECTING WMP

It is important to recognise that the cost savings and associated changes noted above are all related to maintaining WMP's existing capacity and capability to deal with the current level of development and population across Redditch and Bromsgrove, and to addressing existing deficiencies as is required under planning law and the CIL Regulations.

WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in either Redditch and Bromsgrove.

On behalf of WMP, we would be grateful if you record these representations to Redditch Borough Council and Bromsgrove District Council in respect of the Redditch Local Plan and Infrastructure Delivery Plan and the Redditch and Bromsgrove Housing Growth consultation.

Please keep us informed of progress on the production of Local Plan documents across the two authorities.

If you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

[redacted]

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6th November 2013

Development Plans
Redditch Borough Council
Walter Stranz Square
Redditch
B98 8AH

E-mail: devplans@redditchbc.gov.uk

Dear Sir or Madam

Borough of Redditch Local Plan No. 4: Proposed Submission Document – September 2013
Borough of Redditch Draft Infrastructure Delivery Plan – September 2013

WYG is instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the infrastructure aspects of the above consultation documents. We understand that separate representations will be made by WMPCC relating to other matters affecting policing.

West Mercia Police (WMP) submitted representations previously on Redditch's Preferred Draft Core Strategy in 2011 and WYG submitted representations by letter of 15th May 2013 to the Draft Borough of Redditch Local Plan No. 4, the Redditch Draft Infrastructure Delivery Plan Report (March 2013) and the Joint Redditch and Bromsgrove Housing Growth Consultation.

This representation updates the representation of 15th May 2013; however much of the information provided in that letter remains unchanged and we are therefore appending that letter for ease of reference.

The May 2013 letter made it clear that WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in Redditch (including development proposed in Bromsgrove District to meet Redditch related growth requirements). The information provided in that letter on WMP's financial position (see the section on WMPCC's Interim Statement) outlines the financial constraints within which WMP continues to operate.

The May 2013 letter also noted that WMP has been instructed WYG to prepare a Strategic Infrastructure Assessment (SIA) that will provide detailed evidence of WMP's Infrastructure requirements. It has now been decided in view of the significant cross border implications for policing, that rather than producing separate SIAs for Redditch and Bromsgrove, a single overarching SIA will be produced covering infrastructure requirements for both Redditch Borough and Bromsgrove District. However infrastructure costs will be apportioned between the two districts in proportion to the growth strategies of each authority. When completed, the SIA will inform the Infrastructure Delivery Plans being prepared by the two authorities.

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The Borough of Redditch Local Plan No.4 (BORLP4)

Draft Policy 3

Draft Policy 3 appears to be the policy dealing specifically with the need to provide the requisite infrastructure to support the growth proposed although it appears to focus particularly on the Strategic Sites. This policy does not make it explicit that developers will be expected to make contributions, whether financial or in kind to fund infrastructure, nor does it define what is meant by infrastructure. It might be inferred from the supporting text that the definition of infrastructure will be that provided in the Draft IDP; however this is by no means clear.

Infrastructure provision is a fundamental component of sustainable development and we consider it warrants a separate and specific policy which defines what is meant by infrastructure and states categorically that contributions will be sought from developers via s106 or other mechanisms in accordance with Regulation 122 of the CIL regulations 2010.

For WMP, infrastructure includes:

- buildings and accommodation
- personnel set-up costs
- vehicles and other operational equipment, and
- central support services including personnel in operational support, human resources and corporate services

The forthcoming SIA will provide evidence of how the growth proposed in the BORLP4 will impact on WMPs infrastructure needs and provide a costed breakdown of the infrastructure required to support this growth.

Draft Policy 4

We note the housing provision set out in Draft Policy 4. Growth of this scale will impact significantly on policing requirements and this will be addressed in the forthcoming SIA.

Unfortunately, we are unable to provide an update with regard to the position in relation to Redditch Police Station. As previously advised, Redditch Police Station is to be sold and new larger premises will be required. The location has yet to be determined. At present, it seems likely that a temporary facility will be required on a short–term lease until the new Police Station is operational.

The Joint Estates Strategy being prepared as part of WMP's Strategic Alliance with Warwickshire Police (our previous letter refers) is not yet available and it is not possible to provide any information on the implications for Redditch in terms of premises or policing arrangements. In addition to needs arising from development growth, WMP's commitment to neighbourhood policing and various organisational changes may have an impact on the Police estate and will influence future property requirements in the Borough.

Borough of Redditch Draft Infrastructure Delivery Plan – September 2013 (IDP)

We note that this is a live document which will be updated as and when infrastructure requirements are clarified. When completed the SIA will inform the IDP to provide a more comprehensive picture of WMP's growth related infrastructure requirements.

The definition of infrastructure set out on Page 20 is in line with WMP's definition (see above). Appendix A of the draft IDP (pages xiii and xiv) lists the types of infrastructure and comments that timescales and costs will be included in the SIA. Unfortunately production of the SIA has been delayed. However, we anticipate it will be available later this year.

We will keep you informed on progress with the SIA. In the meantime, if you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

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15th May 2013

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Dear Sir or Madam

DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO. 4

BOROUGH OF REDDITCH DRAFT INFRASTRUCTURE DELIVERY PLAN REPORT – MARCH 2013

JOINT REDDITCH AND BROMSGROVE HOUSING GROWTH CONSULTATION

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The existing police station at Redditch was constructed in the 1970s and is no longer fit for purpose. The anticipated increase of over 3,000 dwellings (6,400 dwellings, to include the cross boundary growth in Bromsgrove) will impact significantly upon the operation of the police station resulting in the need for additional infrastructure. Consequently, the intention now is for WMP to dispose of Redditch Police Station with some of proceeds being put towards the cost of a new larger Police Station. The custody facility at Redditch will be closed and alternative services provided at Kidderminster for the medium term until the new Redditch station is completed, at which point it is likely that custody will have to be re-provided at Redditch as a result of the population and household growth. Indeed, the expansion of the police station facility is necessitated, chiefly, by the planned population and household growth. Whilst detailed plans have yet to be formulated, a proportion of the cost of the new Police Station therefore, can be quite reasonably attributed to growth, justifying funding of this longer term project through planning contributions and the Community Infrastructure Levy.

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We welcome the inclusion of policing within the Council's definition of infrastructure, as set out in the Borough of Redditch Draft Infrastructure Delivery Plan Report (2013). The need to adequately consider the need for additional policing infrastructure is integral to the production of a sound Development Plan. As a case in point, the Melton Core Strategy was recently withdrawn following the Planning Inspector's comments that the document would be unsound due to a number of matters of fundamental concern. One of the Inspector's concerns centred on the fact that the requirements set out within Melton Council's Infrastructure Delivery Plan were not adequate to meet the Leicestershire Police's infrastructure requirements. The inspector cited that the Core Strategy was in conflict with paragraph 182 of the NPPF which states that plans *"should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements".*

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Police and Crime Plan

It is a legal requirement that the WMPCC produces a Police and Crime Plan and this is subject to public consultation. The first Police and Crime Plan for West Mercia was adopted on 1st April 2013 and sets out objectives and priorities for the period from 1st April 2013 to 31st March 2017. The Police and Crime Plan sets out Mr Longmore's priorities that will form the framework within which the Chief Constable will deploy resources. This also includes further information on a Medium Term Financial Plan and the 2012/2014 Budget.

The WMPCC states that he is anxious to preserve so far as resources allow, the visibility and availability of front line Police services. He notes that the alliance with Warwickshire Police brings opportunities for introducing new processes and reducing duplication across the combined area whilst maintaining service levels with fewer personnel. The WMPCC emphasises the role of support services which, as he points out, are not front line in the ordinary sense, but are absolutely vital to allow the front line to operate effectively.

One of the objectives of the Police and Crime Plan is to provide effective neighbourhood policing. In West Mercia, local policing teams, soon to be known as 'safer neighbourhood teams', made up of local policing officers, community support officers (CSOs) and special constables work with the community to tackle local crime and disorder problems, improve the environment, and provide reassurance to all residents.

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The strategic sites, split site urban extension and other major developments proposed in Redditch Borough and Bromsgrove District will require neighbourhood policing to be embedded along with other infrastructure at the outset, and the SIA will set out the requirements and costs associated with this provision.

Under the provisions of the Police Reform and Social Responsibility Act 2011, the Police and Crime Commissioner is required to secure an efficient and effective police force [Part 1, section 1, subsection (5) (c)]. The provision of the necessary infrastructure is consequently essential in order to fulfil this duty.

WMPCC's Interim Statement

The WMPCC also issued an Interim Statement (1st February 2012). This advises that he proposes to recommend to the WMPCP a freeze on the police precept for 2013/14. At its meeting on 6th February, the WMPCP accepted Mr Longmore's recommendation and the freeze on the 2012/14 precept was confirmed.

The Interim Statement also advises of the WMPCP's intention to make use of reserves in the next financial year, and over the following three years. However, as the WMPCC acknowledges, the use of reserves cannot provide a long term solution and further spending reductions will be required. The WMPCC envisages a real terms reduction of £20m in police expenditure by 2015/16.

A key to achieving this reduction will be the on-going restructure of policing across West Mercia, particularly affecting the back-up and support services. These services will in future be provided more economically in alliance with Warwickshire Police (see below).

It is clear from the above that WMP's ability to provide the additional infrastructure identified as being necessary to support the development growth proposed across the Borough and District will be dependent upon securing funding via developer contributions and/or CIL.

Progress with the Strategic Alliance with Warwickshire Police

Joint working between WMP and Warwickshire Police as part of the Strategic Alliance is ongoing in order to secure efficiencies whilst at the same time maintaining front line services. A joint Estates Strategy is currently being prepared and an announcement is expected in the near future. When further information becomes available, we will advise you of any implications for WMP in terms of infrastructure and other related matters.

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CONCLUSIONS ON RECENT CHANGES AFFECTING WMP

It is important to recognise that the cost savings and associated changes noted above are all related to maintaining WMP's existing capacity and capability to deal with the current level of development and population across Redditch and Bromsgrove, and to addressing existing deficiencies as is required under planning law and the CIL Regulations.

WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in either Redditch and Bromsgrove.

On behalf of WMP, we would be grateful if you record these representations to Redditch Borough Council and Bromsgrove District Council in respect of the Redditch Local Plan and Infrastructure Delivery Plan and the Redditch and Bromsgrove Housing Growth consultation.

Please keep us informed of progress on the production of Local Plan documents across the two authorities.

If you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

[redacted]

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WYG Planning & Environment

part of the **WYG** group

Ref: DA/RW/A066406-14

6th November 2013

Planning Policy
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire B60 1AA

E-mail: strategicplanning@bromsgrove.gov.uk

Dear Sir or Madam

Bromsgrove District Plan Proposed Submission Version 2011-2030
Bromsgrove Draft Infrastructure Delivery Plan – September 2013

WYG is instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the infrastructure aspects of the above consultation documents. We understand that separate representations will be made by WMPCC relating to other matters affecting policing.

West Mercia Police (WMP) submitted representations previously on the Bromsgrove District Council Draft Core Strategy in 2011 and WYG submitted representations by letter of 15th May 2013 to the Joint Redditch and Bromsgrove Housing Growth Consultation.

This representation updates the representation of 15th May 2013; however much of the information provided in that letter remains unchanged and we are therefore appending that letter for ease of reference.

The May 2013 letter made it clear that WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in Bromsgrove, including development proposed to meet Redditch related growth requirements. The information provided in that letter on WMP's financial position (see the section on WMPCC's Interim Statement) outlines the financial constraints within which WMP continues to operate.

The May 2013 letter also noted that WMP has been instructed WYG to prepare a Strategic Infrastructure Assessment (SIA) that will provide detailed evidence of WMP's Infrastructure requirements. It has now been decided in view of the significant cross border implications for policing, that rather than producing separate SIAs for Bromsgrove and Redditch, a single overarching SIA will be produced covering infrastructure requirements for both Bromsgrove District and Redditch Borough. However infrastructure costs will be apportioned between the two districts in proportion to the growth strategies of each authority. When completed, the SIA will inform the Infrastructure Delivery Plans being prepared by the two authorities.

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Bromsgrove District Plan Proposed Submission Version 2011-2030

Draft Policy BDP3
This Policy sets out development targets for housing and employment growth and provides for 7,000 dwellings to be provided in the district to meet development needs within the plan period, with a further 3,400 dwellings to be provided on land adjacent to the administrative boundary with Redditch Borough to meet the growth needs of Redditch that cannot be accommodated within its own administrative area.

Growth of this scale will impact significantly on policing requirements and this will be addressed in the forthcoming SIA. The targets set out in BDP3 will be used in the SIA to determine the additional infrastructure requirements and costs for WMP as a result of the proposed growth.

Draft Policy BDP6
The Policy addresses the need for infrastructure contributions to be co-ordinated to ensure that growth is supported by the provision of infrastructure, facilities and service. No definition is provided for infrastructure although reference is made to the Infrastructure Delivery Plan.

For WMP, infrastructure includes:

- buildings and accommodation
- personnel set-up costs
- vehicles and other operational equipment, and
- central support services including personnel in operational support, human resources and corporate services

The forthcoming SIA will provide evidence of how the growth proposed in the Bromsgrove District Plan will impact on WMPs infrastructure needs and provide a costed breakdown of the infrastructure required to support this growth.

We note the Policy indicates that contributions towards infrastructure will be secured through a Community Infrastructure Levy (CIL). We look forward in due course to contributing to discussions and consultations on CIL.

Draft Policy BDP12
The Policy relates to the provision of services and facilities to meet the needs of the community. The policy cross-refers to BDP6 and notes that new developments that add to requirements for infrastructure and services will be expected to contribute to the provision of necessary improvements.

Policing provision is a fundamental component of sustainable communities and, while this is not explicit in the policy, we note that paragraph 8.135 includes "emergency safety (including the emergency services)" under the umbrella of essential community facilities. Whilst we assume that this is intended to cover in a general sense police, fire and ambulance provision, it would be helpful if the paragraph set this out more fully to make it clear that WMP's remit is not confined to provision of an emergency service.

Bromsgrove Draft Infrastructure Delivery Plan – September 2013 (IDP)

We note that this is a live document which will be updated as and when infrastructure requirements are clarified. When completed the SIA will inform the IDP to provide a more comprehensive picture of WMP's growth related infrastructure requirements.

Appendix A Page 39 of the IDP lists some of the types of infrastructure that WMP will require to ensure that growth is supported by the necessary police resources. We appreciate this list is not necessarily intended to be fully inclusive of the types of infrastructure that WMP may require; however, the summary above provides a short guide that might usefully be included.

Appendix B, Infrastructure Delivery Schedules under the heading Emergency Services includes reference to the Bromsgrove Joint Police and Fire Station. Until the SIA is available, it is not possible to identify additional items of infrastructure that will need needed as a result of the Bromsgrove District Plan's growth proposals. Unfortunately production of the SIA has been delayed. However, we anticipate it will be available later this year. However as an interim measure we request that the categories of infrastructure identified above are included in this schedule i.e.:

- buildings and accommodation
- personnel set-up costs
- vehicles and other operational equipment, and
- central support services including personnel in operational support, human resources and corporate services

You may be aware that the draft Redditch IDP has adopted this approach.

We will keep you informed on progress with the SIA. In the meantime, if you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

Ref: DA/JL/A066406-14

15th May 2013

Development Plans
Redditch Borough Council
Walter Stranz Square
Redditch
B98 8AH

Planning Policy
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire B60 1AA

Email: consultplanning@bromsgroveandredditch.gov.uk

Dear Sir or Madam

DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO. 4

BOROUGH OF REDDITCH DRAFT INFRASTRUCTURE DELIVERY PLAN REPORT – MARCH 2013

JOINT REDDITCH AND BROMSGROVE HOUSING GROWTH CONSULTATION

We are instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the above consultation documents. West Mercia Police (WMP) has submitted representations previously on Redditch's Preferred Draft Core Strategy in 2011.

WMP is one of the key infrastructure providers in Redditch Borough and Bromsgrove District. The Borough of Redditch Draft Infrastructure Delivery Plan Report (March 2013) (p.38 and 39) lists the police infrastructure required to serve the planned growth in the Borough.

We are now in a position to update the Council on the police infrastructure required to support the spatial planning strategy set out in the emerging Redditch Local Plan.

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As you may be aware, it was previously proposed by West Mercia Police and Hereford & Worcester Fire and Rescue Service in 2011 to develop two new joint police and fire stations; one in Bromsgrove and one in Redditch (Worcestershire Needs and Issues Document, 2012). Unfortunately, following further feasibility work, this is no longer an adequate solution for Redditch due to the differing operational requirements of the two emergency services. The planning and delivery of any new facilities in the Borough will proceed independently.

The existing police station at Redditch was constructed in the 1970s and is no longer fit for purpose. The anticipated increase of over 3,000 dwellings (6,400 dwellings, to include the cross boundary growth in Bromsgrove) will impact significantly upon the operation of the police station resulting in the need for additional infrastructure. Consequently, the intention now is for WMP to dispose of Redditch Police Station with some of proceeds being put towards the cost of a new larger Police Station. The custody facility at Redditch will be closed and alternative services provided at Kidderminster for the medium term until the new Redditch station is completed, at which point it is likely that custody will have to be re-provided at Redditch as a result of the population and household growth. Indeed, the expansion of the police station facility is necessitated, chiefly, by the planned population and household growth. Whilst detailed plans have yet to be formulated, a proportion of the cost of the new Police Station therefore, can be quite reasonably attributed to growth, justifying funding of this longer term project through planning contributions and the Community Infrastructure Levy.

The new Bromsgrove Police and Fire Station has the capacity to address the anticipated growth within the District, apart from the projected increase in population as a result of the Redditch urban extension. The new Redditch Police Station will deliver services to the urban extension as well as to the existing Redditch Borough. The urban extension comprises approximately 3,400 dwellings, currently proposed to be sited at Foxlydiate and Brockhill East, and being Redditch related development (albeit in the District of Bromsgrove) is best served by the new Redditch Police Station.

In response to the Councils' forthcoming consultations on the CIL charging schedules, WMP has instructed WYG to provide detailed evidence setting out WMP's infrastructure requirements for the plan period for each local authority. This will be in the form of a Strategic Infrastructure Assessment (SIA).

The SIA will provide evidence of the infrastructure requirements of WMP which will be needed to ensure policing services continue to be delivered to an acceptable standard in response to anticipated growth. Due to the differing stages of Local Plan preparation, individual SIAs will be produced for each LPA,

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although reference will be made to the linkages between the two authorities, in respect of the cross-boundary housing growth proposals.

The Redditch SIA is in the initial stages of preparation and cannot be completed until the Joint Estates Strategy and Local Policing Plans are adopted. You will no doubt be aware that the Local Policing Plans, which have been well reported by the local press, will set out the new approach to local policing in West Mercia. They will include details of the basing of Safer Neighbourhood Teams, the stations to be kept and those which it is proposed should be closed and the buildings/sites disposed of. A full SIA covering the growth in Redditch and the Redditch related development in Bromsgrove is expected to be complete by the time the Submission Local Plan is published for consultation (August/September 2013), and indeed when the next iteration of the Infrastructure Delivery Plan is published. It is intended that the SIA will be updated periodically to reflect changes in WMP's service delivery, the outcomes of which will feed into the Councils' Infrastructure List, a 'live document'.

We welcome the inclusion of policing within the Council's definition of infrastructure, as set out in the Borough of Redditch Draft Infrastructure Delivery Plan Report (2013). The need to adequately consider the need for additional policing infrastructure is integral to the production of a sound Development Plan. As a case in point, the Melton Core Strategy was recently withdrawn following the Planning Inspector's comments that the document would be unsound due to a number of matters of fundamental concern. One of the Inspector's concerns centred on the fact that the requirements set out within Melton Council's Infrastructure Delivery Plan were not adequate to meet the Leicestershire Police's infrastructure requirements. The inspector cited that the Core Strategy was in conflict with paragraph 182 of the NPPF which states that plans *"should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements".*

Nevertheless, it should be noted that police infrastructure is not a narrowly defined term and is not limited to buildings. The Association of Chief Police Officers (ACPO) has taken legal advice from Ian Dove QC and this supports this contention (see paragraph 6 of the advice). Infrastructure can include equipment, which might, for example, include vehicles, communications technology and surveillance equipment. It is also legitimate to include the set up costs for new staff covering recruitment, training, uniform and personal equipment and this will pertain equally under the forthcoming CIL regime. Both the Council's IDP and the Worcestershire Infrastructure Strategy refer to the number of additional police officers required as a result of planned population and household growth. We therefore ask that reference is made also within the IDP to the costs of equipment and staff set-up costs for new personnel required to serve the identified growth. The SIA will be based on this definition of infrastructure when assessing infrastructure needs of the district.

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I have set out below information on the recent changes affecting WMP which will provide some further background to WMP's approach to policing of existing development and the points made above:

OVERVIEW OF RECENT CHANGES AFFECTING WMP

Election of the Police and Crime Commissioner

Since the previous consultations, the West Mercia Police Authority has been replaced as the body responsible for overseeing policing in West Mercia by the WMPCC, Bill Longmore, who now has responsibility for policing and crime in the West Mercia force area. The WMPCC will also set the budget for the force with effect from April 2013. The WMPCC is subject to scrutiny by the West Mercia Police and Crime Panel (WMPCP), which comprises fifteen members of the local authorities across the force area, together with two independent members.

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CONCLUSIONS ON RECENT CHANGES AFFECTING WMP

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WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in either Redditch and Bromsgrove.

On behalf of WMP, we would be grateful if you record these representations to Redditch Borough Council and Bromsgrove District Council in respect of the Redditch Local Plan and Infrastructure Delivery Plan and the Redditch and Bromsgrove Housing Growth consultation.

Please keep us informed of progress on the production of Local Plan documents across the two authorities.

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Yours faithfully,

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WYG Planning & Environment

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Ref: DA/RW/A066406-14

6th November 2013

For information.

Development Plans
Redditch Borough Council
Walter Stranz Square
Redditch
B98 8AH

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Dear Sir or Madam

Borough of Redditch Local Plan No. 4: Proposed Submission Document – September 2013
Borough of Redditch Draft Infrastructure Delivery Plan – September 2013

WYG is instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the infrastructure aspects of the above consultation documents. We understand that separate representations will be made by WMPCC relating to other matters affecting policing.

West Mercia Police (WMP) submitted representations previously on Redditch's Preferred Draft Core Strategy in 2011 and WYG submitted representations by letter of 15th May 2013 to the Draft Borough of Redditch Local Plan No. 4, the Redditch Draft Infrastructure Delivery Plan Report (March 2013) and the Joint Redditch and Bromsgrove Housing Growth Consultation.

This representation updates the representation of 15th May 2013; however much of the information provided in that letter remains unchanged and we are therefore appending that letter for ease of reference.

The May 2013 letter made it clear that WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in Redditch (including development proposed in Bromsgrove District to meet Redditch related growth requirements). The information provided in that letter on WMP's financial position (see the section on WMPCC's Interim Statement) outlines the financial constraints within which WMP continues to operate.

The May 2013 letter also noted that WMP has been instructed WYG to prepare a Strategic Infrastructure Assessment (SIA) that will provide detailed evidence of WMP's Infrastructure requirements. It has now been decided in view of the significant cross border implications for policing, that rather than producing separate SIAs for Redditch and Bromsgrove, a single overarching SIA will be produced covering infrastructure requirements for both Redditch Borough and Bromsgrove District. However infrastructure costs will be apportioned between the two districts in proportion to the growth strategies of each authority. When completed, the SIA will inform the Infrastructure Delivery Plans being prepared by the two authorities.

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The Borough of Redditch Local Plan No.4 (BORLP4)

Draft Policy 3

Draft Policy 3 appears to be the policy dealing specifically with the need to provide the requisite infrastructure to support the growth proposed although it appears to focus particularly on the Strategic Sites. This policy does not make it explicit that developers will be expected to make contributions, whether financial or in kind to fund infrastructure, nor does it define what is meant by infrastructure. It might be inferred from the supporting text that the definition of infrastructure will be that provided in the Draft IDP; however this is by no means clear.

Infrastructure provision is a fundamental component of sustainable development and we consider it warrants a separate and specific policy which defines what is meant by infrastructure and states categorically that contributions will be sought from developers via s106 or other mechanisms in accordance with Regulation 122 of the CIL regulations 2010.

For WMP, infrastructure includes:

- buildings and accommodation
- personnel set-up costs
- vehicles and other operational equipment, and
- central support services including personnel in operational support, human resources and corporate services

The forthcoming SIA will provide evidence of how the growth proposed in the BORLP4 will impact on WMPs infrastructure needs and provide a costed breakdown of the infrastructure required to support this growth.

Draft Policy 4

We note the housing provision set out in Draft Policy 4. Growth of this scale will impact significantly on policing requirements and this will be addressed in the forthcoming SIA.

Unfortunately, we are unable to provide an update with regard to the position in relation to Redditch Police Station. As previously advised, Redditch Police Station is to be sold and new larger premises will be required. The location has yet to be determined. At present, it seems likely that a temporary facility will be required on a short–term lease until the new Police Station is operational.

The Joint Estates Strategy being prepared as part of WMP's Strategic Alliance with Warwickshire Police (our previous letter refers) is not yet available and it is not possible to provide any information on the implications for Redditch in terms of premises or policing arrangements. In addition to needs arising from development growth, WMP's commitment to neighbourhood policing and various organisational changes may have an impact on the Police estate and will influence future property requirements in the Borough.

Borough of Redditch Draft Infrastructure Delivery Plan – September 2013 (IDP)

We note that this is a live document which will be updated as and when infrastructure requirements are clarified. When completed the SIA will inform the IDP to provide a more comprehensive picture of WMP's growth related infrastructure requirements.

The definition of infrastructure set out on Page 20 is in line with WMP's definition (see above). Appendix A of the draft IDP (pages xiii and xiv) lists the types of infrastructure and comments that timescales and costs will be included in the SIA. Unfortunately production of the SIA has been delayed. However, we anticipate it will be available later this year.

We will keep you informed on progress with the SIA. In the meantime, if you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

WYG Planning & Environment

part of the **WYG** group

Ref: DA/JL/A066406-14

15th May 2013

Development Plans
Redditch Borough Council
Walter Stranz Square
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Bromsgrove District Council
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Dear Sir or Madam

DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO. 4

BOROUGH OF REDDITCH DRAFT INFRASTRUCTURE DELIVERY PLAN REPORT – MARCH 2013

JOINT REDDITCH AND BROMSGROVE HOUSING GROWTH CONSULTATION

We are instructed by our client, the West Mercia Police and Crime Commissioner (WMPCC), to make representations in respect of the above consultation documents. West Mercia Police (WMP) has submitted representations previously on Redditch's Preferred Draft Core Strategy in 2011.

WMP is one of the key infrastructure providers in Redditch Borough and Bromsgrove District. The Borough of Redditch Draft Infrastructure Delivery Plan Report (March 2013) (p.38 and 39) lists the police infrastructure required to serve the planned growth in the Borough.

We are now in a position to update the Council on the police infrastructure required to support the spatial planning strategy set out in the emerging Redditch Local Plan.

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As you may be aware, it was previously proposed by West Mercia Police and Hereford & Worcester Fire and Rescue Service in 2011 to develop two new joint police and fire stations; one in Bromsgrove and one in Redditch (Worcestershire Needs and Issues Document, 2012). Unfortunately, following further feasibility work, this is no longer an adequate solution for Redditch due to the differing operational requirements of the two emergency services. The planning and delivery of any new facilities in the Borough will proceed independently.

The existing police station at Redditch was constructed in the 1970s and is no longer fit for purpose. The anticipated increase of over 3,000 dwellings (6,400 dwellings, to include the cross boundary growth in Bromsgrove) will impact significantly upon the operation of the police station resulting in the need for additional infrastructure. Consequently, the intention now is for WMP to dispose of Redditch Police Station with some of proceeds being put towards the cost of a new larger Police Station. The custody facility at Redditch will be closed and alternative services provided at Kidderminster for the medium term until the new Redditch station is completed, at which point it is likely that custody will have to be re-provided at Redditch as a result of the population and household growth. Indeed, the expansion of the police station facility is necessitated, chiefly, by the planned population and household growth. Whilst detailed plans have yet to be formulated, a proportion of the cost of the new Police Station therefore, can be quite reasonably attributed to growth, justifying funding of this longer term project through planning contributions and the Community Infrastructure Levy.

The new Bromsgrove Police and Fire Station has the capacity to address the anticipated growth within the District, apart from the projected increase in population as a result of the Redditch urban extension. The new Redditch Police Station will deliver services to the urban extension as well as to the existing Redditch Borough. The urban extension comprises approximately 3,400 dwellings, currently proposed to be sited at Foxlydiate and Brockhill East, and being Redditch related development (albeit in the District of Bromsgrove) is best served by the new Redditch Police Station.

In response to the Councils' forthcoming consultations on the CIL charging schedules, WMP has instructed WYG to provide detailed evidence setting out WMP's infrastructure requirements for the plan period for each local authority. This will be in the form of a Strategic Infrastructure Assessment (SIA).

The SIA will provide evidence of the infrastructure requirements of WMP which will be needed to ensure policing services continue to be delivered to an acceptable standard in response to anticipated growth. Due to the differing stages of Local Plan preparation, individual SIAs will be produced for each LPA,

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although reference will be made to the linkages between the two authorities, in respect of the cross-boundary housing growth proposals.

The Redditch SIA is in the initial stages of preparation and cannot be completed until the Joint Estates Strategy and Local Policing Plans are adopted. You will no doubt be aware that the Local Policing Plans, which have been well reported by the local press, will set out the new approach to local policing in West Mercia. They will include details of the basing of Safer Neighbourhood Teams, the stations to be kept and those which it is proposed should be closed and the buildings/sites disposed of. A full SIA covering the growth in Redditch and the Redditch related development in Bromsgrove is expected to be complete by the time the Submission Local Plan is published for consultation (August/September 2013), and indeed when the next iteration of the Infrastructure Delivery Plan is published. It is intended that the SIA will be updated periodically to reflect changes in WMP's service delivery, the outcomes of which will feed into the Councils' Infrastructure List, a 'live document'.

We welcome the inclusion of policing within the Council's definition of infrastructure, as set out in the Borough of Redditch Draft Infrastructure Delivery Plan Report (2013). The need to adequately consider the need for additional policing infrastructure is integral to the production of a sound Development Plan. As a case in point, the Melton Core Strategy was recently withdrawn following the Planning Inspector's comments that the document would be unsound due to a number of matters of fundamental concern. One of the Inspector's concerns centred on the fact that the requirements set out within Melton Council's Infrastructure Delivery Plan were not adequate to meet the Leicestershire Police's infrastructure requirements. The inspector cited that the Core Strategy was in conflict with paragraph 182 of the NPPF which states that plans *"should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements".*

Nevertheless, it should be noted that police infrastructure is not a narrowly defined term and is not limited to buildings. The Association of Chief Police Officers (ACPO) has taken legal advice from Ian Dove QC and this supports this contention (see paragraph 6 of the advice). Infrastructure can include equipment, which might, for example, include vehicles, communications technology and surveillance equipment. It is also legitimate to include the set up costs for new staff covering recruitment, training, uniform and personal equipment and this will pertain equally under the forthcoming CIL regime. Both the Council's IDP and the Worcestershire Infrastructure Strategy refer to the number of additional police officers required as a result of planned population and household growth. We therefore ask that reference is made also within the IDP to the costs of equipment and staff set-up costs for new personnel required to serve the identified growth. The SIA will be based on this definition of infrastructure when assessing infrastructure needs of the district.

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I have set out below information on the recent changes affecting WMP which will provide some further background to WMP's approach to policing of existing development and the points made above:

OVERVIEW OF RECENT CHANGES AFFECTING WMP

Election of the Police and Crime Commissioner

Since the previous consultations, the West Mercia Police Authority has been replaced as the body responsible for overseeing policing in West Mercia by the WMPCC, Bill Longmore, who now has responsibility for policing and crime in the West Mercia force area. The WMPCC will also set the budget for the force with effect from April 2013. The WMPCC is subject to scrutiny by the West Mercia Police and Crime Panel (WMPCP), which comprises fifteen members of the local authorities across the force area, together with two independent members.

Police and Crime Plan

It is a legal requirement that the WMPCC produces a Police and Crime Plan and this is subject to public consultation. The first Police and Crime Plan for West Mercia was adopted on 1st April 2013 and sets out objectives and priorities for the period from 1st April 2013 to 31st March 2017. The Police and Crime Plan sets out Mr Longmore's priorities that will form the framework within which the Chief Constable will deploy resources. This also includes further information on a Medium Term Financial Plan and the 2012/2014 Budget.

The WMPCC states that he is anxious to preserve so far as resources allow, the visibility and availability of front line Police services. He notes that the alliance with Warwickshire Police brings opportunities for introducing new processes and reducing duplication across the combined area whilst maintaining service levels with fewer personnel. The WMPCC emphasises the role of support services which, as he points out, are not front line in the ordinary sense, but are absolutely vital to allow the front line to operate effectively.

One of the objectives of the Police and Crime Plan is to provide effective neighbourhood policing. In West Mercia, local policing teams, soon to be known as 'safer neighbourhood teams', made up of local policing officers, community support officers (CSOs) and special constables work with the community to tackle local crime and disorder problems, improve the environment, and provide reassurance to all residents.

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The strategic sites, split site urban extension and other major developments proposed in Redditch Borough and Bromsgrove District will require neighbourhood policing to be embedded along with other infrastructure at the outset, and the SIA will set out the requirements and costs associated with this provision.

Under the provisions of the Police Reform and Social Responsibility Act 2011, the Police and Crime Commissioner is required to secure an efficient and effective police force [Part 1, section 1, subsection (5) (c)]. The provision of the necessary infrastructure is consequently essential in order to fulfil this duty.

WMPCC's Interim Statement

The WMPCC also issued an Interim Statement (1st February 2012). This advises that he proposes to recommend to the WMPCP a freeze on the police precept for 2013/14. At its meeting on 6th February, the WMPCP accepted Mr Longmore's recommendation and the freeze on the 2012/14 precept was confirmed.

The Interim Statement also advises of the WMPCP's intention to make use of reserves in the next financial year, and over the following three years. However, as the WMPCC acknowledges, the use of reserves cannot provide a long term solution and further spending reductions will be required. The WMPCC envisages a real terms reduction of £20m in police expenditure by 2015/16.

A key to achieving this reduction will be the on-going restructure of policing across West Mercia, particularly affecting the back-up and support services. These services will in future be provided more economically in alliance with Warwickshire Police (see below).

It is clear from the above that WMP's ability to provide the additional infrastructure identified as being necessary to support the development growth proposed across the Borough and District will be dependent upon securing funding via developer contributions and/or CIL.

Progress with the Strategic Alliance with Warwickshire Police

Joint working between WMP and Warwickshire Police as part of the Strategic Alliance is ongoing in order to secure efficiencies whilst at the same time maintaining front line services. A joint Estates Strategy is currently being prepared and an announcement is expected in the near future. When further information becomes available, we will advise you of any implications for WMP in terms of infrastructure and other related matters.

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CONCLUSIONS ON RECENT CHANGES AFFECTING WMP

It is important to recognise that the cost savings and associated changes noted above are all related to maintaining WMP's existing capacity and capability to deal with the current level of development and population across Redditch and Bromsgrove, and to addressing existing deficiencies as is required under planning law and the CIL Regulations.

WMP has no resources available to enable the provision of the additional infrastructure that will be required to address the demands arising as a result of the future development and population growth proposed in either Redditch and Bromsgrove.

On behalf of WMP, we would be grateful if you record these representations to Redditch Borough Council and Bromsgrove District Council in respect of the Redditch Local Plan and Infrastructure Delivery Plan and the Redditch and Bromsgrove Housing Growth consultation.

Please keep us informed of progress on the production of Local Plan documents across the two authorities.

If you have any queries on the above, please do not hesitate to contact me.

Yours faithfully,

[redacted]

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