

Proposed Modifications to the Publication Draft Local Plan (Part 1) – January 2016

Mod 20 – New – Policy DS New 1

Place Partnership Limited on behalf of Warwickshire Police and West Mercia Police

Continuation Sheet

Response to Question 7 - Continued

- Paras 58 and 69 – Planning policies and decision should ensure safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;
- Para 70 – Planning policies and decisions should plan positively for the provision of the facilities and services the community needs, including other local services, to enhance sustainability. They should guard against the loss of valued facilities and services and ensure an integrated approach in considering the location of uses, community facilities and services;
- Para 156 – Local Plans should contain strategic policies to deliver security infrastructure;
- Para 157 – Local Plan should plan positively for development and infrastructure through co-operation with public sector organisations;
- Para 158 – Plans should use a sound evidence base about social characteristics and prospects for the area;
- Para 162 – Planning authorities should work with providers to assess the quality and capacity of existing infrastructures;
- Para 177 – Infrastructure and development policies should be planned at the same time;
- Para 179 – Local planning authorities should work with other bodies to ensure strategic priorities across local boundaries are properly coordinated;
- Para 180 – Local planning authorities should work collaboratively with infrastructure providers; and
- Para 182 – Local Plans are to be positively prepared and based on a strategy to meet objectively assessed development and infrastructure requirements.

As Policy DS NEW 1 is critical for the delivery of Coventry's housing growth outside the city boundary, the identification of the infrastructure requirements to support this represents the development planning anticipated by the NPPF.

The inclusion of the emergency services as part of the infrastructure required to support the development proposed is in accordance with numerous Secretary of State and Planning Inspectorate decisions. These are summarised in **Appendix 1**. These decisions also confirm that police infrastructure is essential to support development growth. This reflects the fact that policing is impacted by development in the same way as other services, such as education and health, with contributions made accordingly in Warwick District. This is demonstrated by the spreadsheet enclosed in **Appendix 2**.

This assertion is further supported by the decision of the High Court in a case brought by Leicestershire Police. Justice Foskett found in his decisions (enclosed in **Appendix 3**):

- Para 11 - It is obvious that a development of the nature described (4,500 homes) would place additional and increased burdens on local health, education and other services including the police force.
- Para 61 – Occupiers of the development will want to know that they are living in a safe policed environment – the consumer view of the issue.
- Para 61 – Police have statutory responsibilities to carry out and although the sums at stake are small in comparison with what will be required to complete the development, the sums are large for the police.
- Para 62 – If a survey of local opinion were taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to meet the demands of policing the new area.

We would finally like to draw the Inspector's attention to the fact that there is recent precedent within the geographical area covered by WP and WMP supporting the inclusion of part (k) within Policy DS NEW 1. This is as follows.

The South Worcestershire Development Plan (adopted February 2016) covers the administrative areas of Malvern Hills, Worcester City and Wychavon Districts.

Policy SWDP 45: *Directions for Growth Outside the City (Worcester) Administrative Boundary* of the Plan concerns proposed housing developments equivalent or greater in size as those proposed by Policy DS NEW 1. There are five parts to Policy SWDP 45, which each concern a major proposed development. Under each part, the most significant infrastructure requirements are listed. Each part included the requirement to contribute towards '*emergency services infrastructure*'. In his report of February 2016, Planning Inspector Roger Clews wrote:

'Because of the particular importance of the urban extensions to the Plan as a whole, policy SWDP 45 sets out details of the infrastructure and other planning requirements for each. These are amended by MM15/45A to ensure they are comprehensive, consistent and effective.'
(para 188)