

GREATER NORWICH LOCAL PLAN – HEARING MATTER 4

SUPPLEMENTARY STATEMENT IN SUPPORT OF NORFOLK CONSTABULARY REGULATION 19 REPRESENTATIONS

As Regulation 19 stage, Norfolk Constabulary made representations regarding the soundness of the Plan. At that time, Norfolk Constabulary reserved the right to appear at the Examination, to outline further the benefit of the suggested change. As the requested changes have not been made prior to Examination by GNLP Officers, this Statement has been prepared to amplify points in relation to the changes requested notably to the Delivery Statement, policy 2 and policy 3. A separate Supplementary Statement has been made in respect of Matter 5 notably in respect of policy 4 and Appendix 1.

1.0 Background Justification

- 1.1 Norfolk Constabulary has responsibility for policing in the County. Their powers and responsibilities are provided by legislation, most notably the Police and Criminal Evidence Act 1984 and the Police Act 1996. These powers place them in a key position to deliver maintain law and order to deliver and maintain safe and accessible communities, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
- 1.2 At present, most Police funding is provided from Central Government and council tax receipts. Across England and Wales for 2020/21, some 66% of funding received by police forces was from central government and some 34% from local sources. These local sources can include finance from developers where it can be demonstrated that the facilities required to meet planning requirements includes that for police infrastructure. Whilst funding sources take some account of the population, they do not meet the initial one-off costs of growth.
- 1.3 As growth generates additional pressure on the Police, with more incidents as population growth occurs, unless funding is secured to provide a level of infrastructure commensurate with that growth, the service provided will suffer and key policy objectives at the national and local level will not be met.
- 1.4 In Norfolk, the greatest pressure is in the Greater Norwich Local Plan (GNLP) area. New development places additional demands on policing in the same way as it does on education and health services. This will increase the work of Norfolk Constabulary and will required new / improved infrastructure to address the needs.
- 1.5 If this new provision is not funded and delivered through the planning system, the consequence is that additional stress will be placed on existing resources.
- 1.6 In June 2020, the National Police Estates Group commissioned Arup to undertake a study and prepare a report on 'Improving the Status of the Emergency Services within the English Planning System'. It highlighted that planning authorities should seek to engage the police during:

- The production of Infrastructure Delivery Plans and other evidence base documents to understand expected policing infrastructure requirements arising from increased housing and population proposed in local plans.
- The production of developer contributions supplementary planning documents (or similar) – to ensure they reflect the contributions asks from the police.

1.8 There should not be an assumption that Police infrastructure will be provided outside the planning framework. Capital funding from Government and other sources is limited. Funding new Police infrastructure through developer contributions / CIL is therefore key to future fulfilment of their statutory obligation to provide an effective Police service. Other emergency services and health providers are in a similar position.

1.9 As far back as 2013, it was recognised that adequate funding for policing was a *fundamental to the concept of sustainable communities and should be met by developers*. The planning appeal decision of the Secretary of State in para 292 of the appeal by Jelson Homes against Charnwood Borough Council (ref no APP/X2410/A/12/2173673) stated

“Adequate policing is so fundamental to the concept of sustainable communities that I can see no reason, in principle, why it should be excluded from the purview of S106 financial contributions, subject to the relevant tests applicable to other public services. There is no reason, it seems to me why police equipment and other items of capital expenditure necessitated by additional development should not be so funded, alongside, for example, additional classrooms and stock and equipment for libraries.”

2.0 Planning Policy Context

2.1 National Planning Policy Framework (NPPF)

2.1.1 Central Government place great emphasis on the role of the Police in a variety of guidance. In respect to planning, the National Planning Policy Framework (NPPF) sets out the Government’s strategic policy approach for England and how policies should be applied, and decisions made.

2.1.2 The NPPF highlights the importance of (and gives significant weight to) promoting safe communities (in section 8 of the document). NPPF paragraph 92 states

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion

2.1.3 In addition, the NPPF explains that there will be a requirement for developers to make suitable contributions towards infrastructure required associated with developments. NPPF paragraph 34 states

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health,

transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

- 2.1.4 Whilst the paragraph does not make specific provision for police (the wording only provides 'examples' where funding may be suitable and infra-structure required as a result of significant growth), the requirements for Police should fall within this definition. It is clear from the Covid-19 pandemic that policing should be considered an essential service, so its current omission from any list of essential infrastructure in the planning system is unjustified. This omission should not be an opportunity exclude funding for new police infrastructure from other designated essential infrastructure such as health, education, transport, open space etc. Norfolk Constabulary should be considered as an equal infrastructure delivery partner within the planning as other providers.

In view of the context set out above, it is considered that within the Infra-structure element of the Delivery Statement, specific reference should be made to Norfolk Constabulary and its wording should be revised to read as follows

..... The Greater Norwich partners will continue to work to coordinate delivery with other providers including Highways England, Anglian Water, other transport and utilities companies, town and parish council, Norfolk Constabulary and local health care providers. Infrastructure will be delivered through:

Furthermore, Para 143 should add reference to police and read as follows:

Existing schools, police and health facilities will be expanded, and new facilities provided to serve growing communities, with greater use of technology to access some types of health care.

- 2.1.5 The planning process recognises that the layout, environmental design and the physical security of buildings are important based upon the established principles of 'Crime Prevention through Environmental Design' (CEPTED). Central Government (notably the NPPF) place great emphasis on the role of the Police within planning consultations, Therefore, Norfolk Constabulary request the suggested change below to ensure conformity with the NPPF and secure soundness to the Plan.

In policy 3 and its supporting text, further provisions that focus on CEPTED (Crime Prevention Through Environmental Design) based on the principles of the police initiative (SBD) Secure By Design should be made.

3.0 Population Growth / Police Funding

3.1 National Police Estates Group Report

- 3.1.1 As outlined in section 1.0, Arup have undertaken a study and report on 'Improving the Status of the Emergency Services within the English Planning System'.

- 3.1.2 The study found that nationally, using the Government's standard method for assessing anticipated housing demand, almost 5,200,000 new houses will be

required from 2020 – 2040. Whilst there could be an adjustment to this figure to reflect a more pessimistic rate of delivery, the numbers of people requiring homes does not reduce – simply that the size of households increases. The Arup study converts the requirements to

- additional floorspace (258,000 – 334,000m²) at a cost of £447m- 577m
- additional police (11,700) and police staff (4,800) at a cost of £107m
- up to £104m for contributions towards an uplift in the vehicle fleet
- c£50m for mobile policing equipment

Whilst it is not easy to make a direct correlation between the above figures on a per new house basis, the Arup work suggests the cost to policing for each new house to maintain current levels - **£168**.

3.1.3 This was a snapshot in time and a national figure. However, it does give a clear indication of the additional infrastructure cost that will result from new development, including in the Greater Norwich area.

3.2 Countywide Current Funding

3.2.1 Norfolk Constabulary recorded over 62,500 crimes in 2020/21 (compared with almost 50,000 crimes four years earlier in 2016/17).

3.2.2 In terms of funding, this has been provided in an approximately two thirds / one third split between Home Office grant and local sources (notably Council tax). In the period 2017 – 2021 the capital financing has shown very limited increase as follows

- 2017/18 - £149,659m
- 2018/19 - £149,853m
- 2019/20 - £151,333m
- 2020/21 - £152,901m

3.2.3 The population of the county has been estimated to grow significantly in the next 15 years as outlined below, with most within the Greater Norwich Area.

- 2018 - 902,800
- 2021 - 918,800
- 2026 - 944,100
- 2031 - 966,400
- 2036 - 985,200

3.2.4 In percentage terms, the increase in population outstrips the increase in funding for Norfolk Constabulary and with projected growth, this will only place further strain on police resources.

4.0 **Implications of proposed growth / Capital costs**

4.0.1 The cost of Norfolk Constabulary services falls within two categories, capital and revenue. Norfolk Constabulary recognise that the only cost that can be secured are capital costs.

4.0.2 Large-scale development sites are likely to result in the most significant impact on existing resources. Either individually, or in combination with other large developments, these could require new and enhanced Police facilities.

- 4.0.3 On such large-scale sites, it may require specific land to be identified for new or expanded Police facilities. In terms of local policing needs, the Police are supportive of the principle of co-location with other appropriate public service or voluntary sector providers, provided it does not compromise their operational needs. In such cases, the Police would expect such facilities to be provided through planning obligations
- 4.0.4 The expansion of existing communities through incremental growth of medium sized sites will impact on Police resources, potentially significantly changing their character and community safety resource requirements. It is important to recognise this and to ensure that sites contribute towards any enhanced facilities required, where justified and necessary.

Therefore, with regard to policy 2, specific reference should be made to require developers of major developments to detail the measures that will be taken to deliver safe, resilient and inclusive communities including how they will fund the necessary infra-structure.

This policy should include reference to the specific objective to create and maintain a safer community and reduce crime and disorder.