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Colin Blundel
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Dear Sir/Madam

Attached is a comments form on the current CIL consultation that is submitted by Place Partnership on behalf of Warwickshire Police and West Mercia Police.

Please could you confirm that it has been received.

Regards

Colin Blundel

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Community Infrastructure Levy Submission Charging Schedule Comment Form



The Community Infrastructure Levy (CIL) - Submission Charging Schedule Consultation is available at www.stratford.gov.uk/CIL2015

Please use the form to make comments on any part of the consultation document.

Please read the consultation document carefully before commenting on this form.

You can respond to this consultation electronically via the above web address.

Please complete this form using black ink. If you require more space please continue on a separate sheet.

Put your contact details in the box(es) below – please use BLOCK CAPITALS

Person(s) or Organisation Submitting Comments		Agent (if applicable)	
Name		Name	Colin Blundel
Organisation (if applicable)	Warwickshire Police and West Mercia Police	Organisation	Place Partnership Ltd
Address		Address	2 Kings Court Charles Hastings Way Worcester WR5 1JR
Tel No.		Tel No.	07734 777318
Email		Email	colin.blundel@placepartnership.co.uk

If you are using an Agent, future correspondence will be sent to them unless informed otherwise.

Please note that responses cannot be treated as confidential.

Date

Forms should be returned by **5.00pm on Friday 13 November 2015**

By email to planning.policy@stratford-dc.gov.uk or,

post to FREEPOST RSLH – ZYKJ – TYAZ, Stratford on Avon DC, PO BOX 5341, Stratford upon Avon, CV37 1LE

Please note that your response will be published on the District Council's website. However, this will exclude the postal address, telephone number and email address of individual respondents. The details of respondents will only be retained by the District Council for the purposes of Core Strategy/CIL preparation and consultation and will not be used for any other purpose.

Please note that only the CIL Submission Charging Schedule itself will be submitted to an independent examiner following this consultation.

Notification of subsequent stages of the Community Infrastructure Levy (CIL)

Please specify if you wish to be notified of any of the following:

Submission of the CIL Submission Charging Schedule for independent examination	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication of the recommendations of the person appointed to carry out an independent examination of the Submission Charging Schedule	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Adoption of the Community Infrastructure Levy	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please make comments on the CIL Submission Charging Schedule consultation document below stating (if applicable) which section you are commenting on:

Place Partnership Ltd (PPL) is the new company that manages to property assets of Warwickshire Police (WP) and West Mercia Police (WMP), along with those of Worcestershire County Council, Worcester City Council, Redditch Borough Council and the Hereford & Worcester Fire and Rescue Service. PPL is a regular participant in the planning process on behalf of the strategic alliance between WP and WMP, working with local authorities across the combined Forces' area.

PPL regularly seeks contributions from new development towards funding additional infrastructure arising directly from increases in housing and local populations. Without these contributions, existing police resources would become stretched and would provide a poorer service to the new developments than currently exists in the area.

WP has received a number of infrastructure contributions in Warwickshire, particularly in Warwick District and Rugby Borough, in some cases requiring attendance at public inquiries or hearings to justify the contributions. PPL currently has requests outstanding for contributions from Gaydon/Lighthorne Heath and Long Marston Airfield.

The development of the CIL for Stratford on Avon District provides a potential mechanism for the provision of contributions towards police infrastructure. In particular PPL would be likely to request contributions from developers towards equipping police officers, police vehicles, Automatic Number Plate Recognition (ANPR) cameras and police premises (Safer Neighbourhood Team Offices).

We currently have established mechanisms for calculating potential contributions to these items, which demonstrate that they are directly relevant to the proposed developments and therefore appropriate for Section 106 contributions. This mechanism has been accepted by Planning Inspectors in relation to appeals, and in a number of cases by the Secretary of State. These cases have demonstrated that such contributions are compliant with CIL regulations 122 and 123. WP/WMP have already provided the Council with details of these cases in previous responses on the Core Strategy. Whilst we have no objection in principle to the equipment, vehicles and ANPR contributions being sought through CIL, we are concerned that sufficient resources must be provided to adequately police new developments whilst not reducing the service provided to the existing communities in the surrounding area. This has potential implications in terms of the overall level of police provision across the District. Also, using CIL could complicate the provision of infrastructure through the receipt of a number of smaller contributions from minor developments over an extended period rather than larger sums at one time (through S106). As some of the items required are high value this would require contributions to be 'saved up' before the necessary investments could be made.

Under the Draft Regulation 123 List, WP/WMP are pleased to see emergency services recognised under CIL and police premises under Section 106. For clarity, it would be better to use the term 'emergency services infrastructure' rather than 'emergency services facilities' as it better describes the likely contribution requests set out above.

In relation to Section 106, the commitment to seeking S106 contributions to Safer Neighbourhood Premises at GLH and LMA is welcomed, but we consider that for developments on this scale other police infrastructure contributions to equipment, vehicles and ANPR should be met through Section 106 rather than CIL. WP/WMP currently have two outstanding requests for contributions from these sites, which include these other types of infrastructure. These requests have been fully evidenced and can be shown to be directly related to the developments. If a new Safer Neighbourhood Premises is created there is a clear need to have the accompanying infrastructure for it to operate effectively.

It is also unclear how future major developments such as the Canal Quarter, West of Bishopton Lane, North of Allimore Lane and South of Daventry Road would fit into the Regulation 123 List. It is common practice from elsewhere for developments on this scale to be excluded from CIL and for infrastructure directly related to the development to be funded through S106.

PPL is currently considering the preparation of a Strategic Infrastructure Assessment to identify police service requirements from developments in Stratford-on-Avon District. In order to take this forward and identify the scope for such a document, we propose to set up a meeting with the Council and our consultants, WYG, to discuss this further.

Do you wish to express an interest to participate in the Examination?

Yes, I wish to participate at the oral Examination

No, I do not wish to participate at the oral Examination

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: *Colin Blundel*

Date: 09 November 2015