

# Ledbury Neighbourhood Development Plan

## Consultation Template

<b>Date:</b> 08 September 2021	<b>Name of organisation:</b> West Mercia Police
<b>Persons completing form (with roles in organisation and contact details)</b>	Andrew Morgan MRTPI, Strategic Planning Manager Office of the West Mercia Police and Crime Commissioner West Mercia Police Headquarters Hindlip Park Worcester WR3 8SP  Tel: 07977 322592 Email: andrew.morgan.62405@westmercia.pnn.police.uk
<b>Estimate of numbers represented by the group</b>	Not applicable.
<b>Key items to comment on</b>	These representations concern two key items:  <ol style="list-style-type: none"><li>1. The proposal for a tri-emergency services hub on the edge of Ledbury and the planning issues that will need further consideration in relation to this.</li><li>2. A new Design Policy for Ledbury that advocates new development incorporating Secured by Design principles and standards.</li></ol>

### **(1) Tri-Emergency Services Hub – Policy IN1.1 of the Existing Ledbury Neighbourhood Plan**

The principle of two or more emergency services sharing a single building is long established in England, with such arrangements intended to deliver a modern capital facility that in turn results in more efficient and effective services to the public.

Although there are no tri-emergency service hubs in West Mercia Police's (WMP) area, there are a number of examples where WMP share buildings with Hereford & Worcester Fire and Rescue Service (HWFRS). The most high profile example of this being the Joint Police and Fire Station in Bromsgrove, with a new one being planned for Redditch at the time of writing. This demonstrates the close partnership work that takes place on an on-going basis between the two organisations.

Whilst WMP and HWFRS also work closely with West Midlands Ambulance Service (WMAS) on a range of matters, this does not extend to delivering shared capital facilities. The reason is that the estate model of WMAS is very different to that of WMP and HWFRS, which reflects its need to deliver patient care in the most optimum way possible.

In brief, WMAS operates what is known as the 'Make Ready' model of service delivery. This is whereby it has a small number of Central Hubs across the geographical area that it covers. Ambulances are then dispatched from the Hubs to a large number of satellite locations (such as police stations and fire stations) where they park and wait to be called into action. After an ambulance leaves a satellite location to respond to an emergency, a new ambulance from the Central Hub is dispatched to replace it. After the first ambulance has responded to the call, it returns to the Hub to be cleaned and re-equipped. It is only sent out again when it is needed to replace another ambulance leaving a designated satellite point. This model of delivery is very good at serving patients.

# Ledbury Neighbourhood Development Plan

## Consultation Template

Turning back to WMP's estate, the Force is of course interested in listening to proposals that will result in improved facilities for personnel to deliver policing services to the local community. In order for any such proposals to be taken forward though in relation to Ledbury specifically, four key factors need to be considered:

1. The cost of delivery of a new Hub of the type envisaged, assuming it's for WMP and HWFRS, will be measured in the (£)millions. Although WMP and HWFRS own their respective stations in the town freehold, the capital receipts gained from disposing of them would not match the cost of a new Hub facility. This means a 'funding gap' would be created that would also be measured in the (£)millions. WMP do not have the financial resources to close it and neither does HWFRS we understand.
2. As there would be a funding gap, it would be necessary to identify alternative sources of monies that could be added to the capital receipts generated by the disposal of the two stations. Funds secured from the Section 106 mechanism and/or Community Infrastructure Levy from developments being proposed in and around Ledbury might be one route, but this would not on its own deliver sufficient funding. The question is therefore could the new Neighbourhood Plan be used to 'leverage' in other sources of money (public or private) to close the funding gap?
3. The Ledbury Police Station and former Magistrates Court building, although one of WMP's older properties, is nevertheless in a good location relative to the rest of the town and surrounding area. Whilst its configuration inside does not match newer police properties, it is in reasonable condition and offers sufficient space for the personnel required to deliver policing services to the community. The site as a whole also offers space for expansion should this be required in future years as the town grows. The question is therefore whether a new Hub facility could not only match these positive attributes, but if possible, surpass them?
4. A related factor to the above is that where police personnel are based has to enable them to respond swiftly and fully to the crime, anti-social behaviour and all other incidents they are required to deal with. Therefore, any new Hub that is delivered must achieve real operational benefits in this context.

Therefore, whilst WMP are open to having discussions about the potential for delivering a new emergency services hub in Ledbury, no commitments can be made to this type of project until the factors described above are comprehensively addressed.

In view of the above, we propose the deletion of Policy IN1.1 and its supporting text in any updated Neighbourhood Plan. WMP recommends that they are replaced with a new policy that supports the delivery of improved community facilities and services in Ledbury in a more general way (rather than limited to one site like Policy LB2 of the existing Neighbourhood Plan). The following text is suggested:

*Policy IN1.1*

### ***Community Services and Facilities***

*Proposals for new community services and facilities in Ledbury will be supported, subject to satisfactory access, design, impact upon residential amenities etc.*

***Such community services and facilities includes, but is not limited to, the emergency services, health services and educational services.***

# Ledbury Neighbourhood Development Plan

## Consultation Template

***Developer Contributions via Section 106, Community Infrastructure Levy and/or other mechanisms will be sought to enable the provision of these community services and facilities to ensure that growth fully mitigates the impacts that it causes in Ledbury and the surrounding area.***

WMP propose the following new supporting text for the policy:

***'Improvements to community services and facilities are needed as development growth takes places in and around Ledbury. These may include the delivery of new on-site facilities, or cumulative contributions may be required towards provision off-site. This will ensure the existing community of Ledbury and the surrounding area suffers no detrimental impacts upon their facilities and services as a result of development growth, whilst at the same time ensuring that new residents and occupiers are able to receive the services and facilities they need.***

Including the above would be in accordance with paragraphs 8, 26, 32 and 93 of the NPPF, which confirm that sustainable development means securing a safe environment through the delivery of social infrastructure needed by communities. In this respect, paragraph 20(b) specifically states that policies should deliver development that makes sufficient provision for security infrastructure.

This in turn helps fulfil the requirements of paragraph 92(b) and 130(f) of the NPPF, which state that planning policies should seek to deliver environments where crime and disorder and the fear of crime do not undermine quality of life, the health of communities or community cohesion.

Paragraphs 16, 26, 28, 32 and 38 of the NPPF collectively envisage this being delivered through joint working by all partners concerned with new developments, which the proposed policy in this case will enable.

This is expanded on by paragraph 97, which states planning policies and decisions should promote safety and security requirements by using the most up-to-date information available from the police who, along with fire fighters, are recognised by Annex 2 of the NPPF as essential local workers providing frontline services to the public.

### **(2) New Design Policy – Secured by Design – Policy BE1.1 of the Existing Ledbury Neighbourhood Plan**

WMP recommends that the next iteration of the Ledbury Neighbourhood Plan takes the opportunity to update and expand Policy BE1.1 – 'Design'. Alongside covering conservation and landscaping issues as it does already, a new policy could make a real difference in promoting crime prevention in Ledbury. This in turn would bring the policy into much closer alignment with paragraphs 8, 20, 35-37, 92(b), 97 and 130(f) of the National Planning Policy Framework (NPPF) (July 2021). Furthermore, National Planning Practice Guidance (NPPG) is very clear that:

***'Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services that it provides.***

***Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities (as well as National Parks, the Broads Authority and the Greater London Authority) to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. Crime for these purposes includes terrorism.***

Paragraph: 009 Reference ID: 53-009-20190722

Revision date: 22 07 2019

# Ledbury Neighbourhood Development Plan

## Consultation Template

*'Good design that considers security as an intrinsic part of a masterplan or individual development can help achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience. However good security is not only about physical measures and design, it requires risks and mitigation to be considered in a holistic way...*

*'Good design means a wide range of crimes from theft to terrorism are less likely to happen by making those committing those crimes more difficult.'*

Paragraph: 010 Reference ID: 53-010-20190722

Revision date 22 07 2019

This has been recently expanded on by the National Model Design Code (July 2021) (Parts 1 and 2), which makes the following points:

- Page 32 – Paragraph 63(iv) – Safety and Security – *'All schemes should aim to create a safe and secure environment and provide a sense of security for all users. Where development is for or has potential for a significant concentration of people schemes should also consider appropriate and proportionate security measures.'*
- Page 61 – Paragraph 144 – Secured by Design – *'Neighbourhoods need to be designed to make all people feel safe and to reduce the incidents of crime in accordance with the recommendations of Secured by Design which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice is available from the police through a network of Designing Out Crime Officers (DOCOs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.'*

In view of all of the above, WMP requests that the updated Ledbury Neighbourhood Plan include the following amendments to Policy BE1.1:

*Policy BE1.1.*

*Design*

*Development should demonstrate that it is sympathetic to the character and appearance of Ledbury and where possible, that it contributes to the conservation and enhancement of the overall distinctiveness of the Neighbourhood Area.*

***Development should also implement Secured by Design principles and standards to maintain a safe and crime free environment.***

*The use of design review is strongly supported.*

WMP propose that the following is added to the supporting text to Policy BE1.1:

***Applicants can seek further information from West Mercia Police's Design Out Crime Officers on how to include Secured by Design measures within their proposals, as well as referring to the official Design Guides available for free from the Secured by Design website.***

# Ledbury Neighbourhood Development Plan

## Consultation Template

**OK to publish report with all information or does it need to be anonymised? (the Inspector will need to see key evidence like this)**

The name of the respondent and comments may be published, but the phone number and email address given should be anonymised.

### **Conclusions and recommendations**

In summary WMP recommend that Policies IN1.1 and BE1.1 be amended in any new iteration of the Ledbury Neighbourhood Plan using the proposed text detailed in these representations. The purpose being to ensure the delivery of the community services and facilities that the community needs, whilst at the same time utilising design measures to help provide an environment that is low crime and safe for the communities who will live in, work at or visit Ledbury and the surrounding area.