



Bedfordshire Police Infrastructure Plan



August 2021

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Preamble

Everyone who lives, works or visits a development scheme expects the emergency services to be there should the worst happen to them, their family, community or property. There are no exceptions.

Despite this, there remains a tacit assumption by some that there is no role for the town planning system to play when it comes to infrastructure delivery for the police and other emergency service.

This assumption is not true of course and in reality delivery of police, fire & rescue and ambulance services must be planned for in advance if they are to be available when they are needed. Planning of this type means anticipating the infrastructure the 'blue light' services require, enabling it be delivered in tandem with development growth and making sure developer funding is available where needed. This is no different to the situation faced by other public services such as the NHS or education authorities.

This Bedfordshire Police Infrastructure Delivery Plan (BPIP) has therefore been prepared to enable the three planning authorities in the County to fully account for Bedfordshire Police's (BP's) infrastructure requirements in relation to the new development that is being proposed across their areas.

The three authorities can be assured that all of the evidence presented here has been prepared in accordance with national best practice, which has been tested extensively and approved by the High Court, Secretary of State and Planning Inspectorate many times in recent years.

It is necessarily an assessment based upon current knowledge and assumptions about housing and population growth, levels of operational policing and budgetary constraints. It will be monitored and reviewed annually to reflect changing circumstances and objectives. BP's commitment to this updating is demonstrated by the fact that this BPIP is the second edition, with the first being submitted to the three Councils in May 2020.

Executive Summary

This is the second Bedfordshire Police Infrastructure Plan (BPIP), which identifies the infrastructure required by the Force to serve the planned growth in Bedford Borough, Central Bedfordshire and Luton Borough to 2035. The BPIP also considers the emerging proposals in relation to London Luton Airport.

The work has taken place in a transitory context at national and local levels. At the time of preparation, the Government is in the process of introducing major reforms to the planning system via a forthcoming Planning Bill. Whilst at the local level Bedford Borough Council are preparing a new Local Plan and Central Bedfordshire Council only adopted its Local Plan in July 2021. Bedfordshire Police (BP) is itself continuing to change and adapt to changing statutory requirements and patterns of crime in the County. Therefore, the findings presented here will be updated annually by BP in partnership with the three planning authorities.

Hitherto BP has absorbed the impacts arising from development and population growth in the County without seeking mitigation from the planning system since 06 April 2015, which was when Central Bedfordshire Council ceased to operate its former North and South Planning Obligations Supplementary Planning Documents. This situation cannot continue though, as BP do not have the capacity or resources to do so. Therefore, if schemes are to be truly sustainable in accordance with the requirements of the National Planning Policy Framework (2021) (NPPF) going forward, they must provide mitigation for the direct impacts they cause upon the delivery of policing services. This situation is no different to other public service providers such as highways, schools and health care for example.

Assessing and quantifying the infrastructure impacts of development growth has been done using a methodology that has been endorsed by the National Police Chiefs' Council and subsequently found to be sound by the Secretary of State 12 times and the Planning Inspectorate 31 times (see **Appendix 3**). The most recent of these decisions is dated 12 August 2021. This provides reassurance that the results shown are directly related to the scale and kind of the developments they concern.

Infrastructure in this context is not purely capital infrastructure, important though this is. The term also encompasses initial equipment and training costs relating to the recruitment of new police officers and police vehicles. The statutory framework, policy and planning guidance support this, as demonstrated by the aforementioned appeal decisions. This is because the sums sought relate to one off costs that BP would have to cover that are directly related to the need arising from new homes and that would otherwise have to be covered by BP.

In this respect, the BPIP identifies that 76 new staff will be required to police the planned growth across the County based on current and anticipated staffing levels in the near future. The staff will need to be recruited, equipped and trained and this will result in one off costs of £512,828.

The additional personnel will need to be accommodated in new estate to serve the planned growth. None of the proposed development sites in Bedfordshire are large enough to warrant creating entirely new on-site BP premises. It is therefore proposed to deliver the additional capacity at the Force's Headquarters and at the Bedford, Biggleswade, Dunstable and Luton Police Stations.

Delivering these premises expansion projects will cost approximately £2.1million in total. This cost excludes land acquisition because BP owns the freehold of its Headquarters and Police Stations.

The total estimated additional infrastructure costs to meet the planned growth of approximately 50,000 dwellings in Bedfordshire is summarised in the table below for ease of reference:

Infrastructure Type	Cost
Recruitment and equipping of staff	£512,828
Police vehicles	£313,047
Police premises	£2,182,950
Total	£3,008,825

However, if the housing allocations are included from the emerging Bedford Local Plan, the total cost shown in the table above rises by £1,637,489 to £4,646,314. This is based on 13,085 new dwellings being delivered in the Borough.

All the costs identified above do not though include those that will arise from the proposed development of London Luton Airport, as it is premature at this stage to state with any certainty as to what these might be. However, it is the intention that this will be incorporated into future editions of the BPIP.

It is important to emphasise that the costs identified concern neighbourhood policing only and reflect the concerted efforts of BP to 'get its own house in order' before engaging with the town planning system. Consequently, the findings of this BPIP are necessary, directly related to all the proposed developments in Bedfordshire and reasonably related in scale and kind.

BP accordingly looks forward to working in partnership with Bedford Borough Council, Central Bedfordshire Council, Luton Borough Council and London Luton Airport to ensure that planned growth across the County comes forward in a sustainable way.

Stage 1

Establishing the Foundations of the BPIP

1 INTRODUCTION

- 1.1 Bedfordshire Police (BP) is responsible for policing in Bedfordshire, which encompasses the planning authorities of Bedford Borough Council, Central Bedfordshire Council and Luton Borough Council.
- 1.2 The development plans being brought forward by the three authorities collectively set out proposals to deliver circa 50,000 dwellings within Bedfordshire by 2035. Approximately 110,000 people will make these new dwellings their homes over this period. This increase in population will require policing and the costs of providing the infrastructure with which to do this will need to be met by the development driving this demand.
- 1.3 Alongside the above, it is also proposed to expand the capacity of London Luton Airport, through the provision of a second terminal, from 18 million passengers per annum to 32 million by 2050. The East-West Rail Project is also in the process of being delivered and discussions continue concerning the Oxford-Cambridge Arc concept. This will all place significant extra demands upon the resources and infrastructure of BP.
- 1.4 Against this backdrop BP is already engaged in significant sharing of specialist services and their costs with its neighbours, Cambridgeshire and Hertfordshire, in an arrangement known as the Tri-Force Initiative. This ensures that costly duplication of services across the three counties is avoided. Therefore, the following are provided collectively:
- Major Crime Unit
 - Counter-terrorism and Detection of Extremism
 - Scientific (Forensic) Services
 - Armed Policing
 - Civil Contingencies
 - Public Order Policing
 - Police Dog Unit
 - Roads Policing/Automatic Number Plate Recognition
 - Firearms and Licensing
 - Professional Standards
 - Procurement
 - ICT
 - HR
- 1.5 The above demonstrates, alongside a comprehensive range of other measures, that BP has made every effort to make savings, improve efficiency and 'get its own house in order' before approaching the planning system for developer contributions to deliver infrastructure.

- 1.6 BP are not alone in approaching the planning system. The scale of population and household growth carries implications for the providers of social infrastructure throughout Bedfordshire. BP is one such provider.
- 1.7 To fulfil its statutory obligations to ensure the proper and effective policing of an increased population and geographical urban area, BP will require additional capital funding to make provision for new infrastructure in each planning authority area. This infrastructure will include:
- Personnel set-up costs;
 - Vehicles and other operational equipment; and
 - Buildings and accommodation.
- 1.8 The methodology used to calculate the nature and scale of this additional infrastructure requirement was formulated and approved originally by the National Police Chiefs' Council (NPCC) (formally the Association of Chief Police Officers (ACPO)), before being tested and approved extensively via planning appeal public inquiries by the Secretary of State and Planning Inspectorate.
- 1.9 It is important to understand that the infrastructure identified as being required cannot be off-set through design measures, even if these follow the Police Service's Secured by Design (SBD) scheme. There are three reasons for this:
1. The first is there is no legal basis by which a Police and Crime Commissioner or a Chief Constable can reduce police service deployment to a development because it incorporates SBD (or other design measures intended to reduce crime). Any that did so would be considered as acting *ultra vires*. The same high quality and level of service must be maintained consistently throughout the force area concerned by law.
 2. Secondly, the idea of reducing police service deployment assumes that the development concerned has implemented SBD, or similar measures, wholly throughout. This is a rare occurrence, with less than 1% of all development nationally doing so.
 3. As a result of the low implementation nationally, there is no evidence that wholly implementing SBD or similar measures directly results in reduced police deployment.
- 1.10 Therefore, using the endorsed methodology, the BPIP quantifies the new infrastructure that will be required and its approximate phasing in relation to the development growth. This includes new premises to serve development growth in each of three planning authority areas of Bedfordshire. The capital cost of providing this new infrastructure is quantified, using established BP data and the analysis of PP's own professional project management consultants.
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- 1.11 The BPIP methodology uses BP’s primary data to establish an existing baseline position. It then makes moderated projections of what infrastructure will be required in the future to 2031-35, together with the capital costs of providing that infrastructure. The methodology uses sufficiently detailed data to ensure accuracy and credibility whilst avoiding complexity in the way the data is used and interpreted. It is a straightforward and accessible method for the purposes of the BPIS. The methodology is described in detail in Section 3.
- 1.12 PP and BP are confident that the resultant BPIP presents robust findings of the additional new infrastructure requirements and their capital costs, based upon currently available knowledge and data. These findings are commended to Bedford Borough Council, Central Bedfordshire Council and Luton Borough Council as the three planning authorities, as an important element of the evidence base for their respective Local Plans. In this regard, BP as a partner organisation, is committed to engaging with the planning process and to working collaboratively with all three Councils to ensure that planned growth is supported by appropriate infrastructure to create sustainable communities in which people feel safe and which can be policed in the most effective and efficient way.

2 METHODOLOGY FOR THE BEDFORDSHIRE POLICE INFRASTRUCTURE PLAN

Overview

- 2.1 It is important the methodology employed in the preparation of the BPIP is clear, logical and readily understood. It should also be capable of replication across each of the three planning authority areas in Bedfordshire. It is necessarily robust and is capable of withstanding scrutiny at public examination or planning appeal public inquiry.
- 2.2 The BPIP utilises a definition of infrastructure that includes personnel set-up costs and vehicles, as well as buildings. This is because there is nothing within the Planning Act 2008, the CIL Regulations 2010 (as amended), the National Planning Policy Framework (July 2021) or Planning Practice Guidance that defines the scope of 'infrastructure'.
- 2.3 Whilst 'infrastructure' is perhaps most readily understood in terms of the provision of 'built or tangible things', there are no exclusions within the statutory framework or planning guidance relating to infrastructure, or indeed in guidance, that exclude equipment and vehicles. This is because the statutory regime is there to provide a framework within which decisions can be made. It is not capable of anticipating, and was not drafted to identify, all possible infrastructure that might be made necessary by new development. Plainly, the need for new officers, vehicles and associated costs would not arise but for new development. All the sums identified in the BPIP relate to one-off costs that BP would have to cover and are directly related to the need arising from new homes. These amounts would otherwise have to be met by BP.
- 2.4 It is worth pointing out that if infrastructure to be funded by developer obligations could only relate to tangible or 'built things', that would pose a serious constraint on planning authorities and infrastructure providers alike in the nature of financial contributions that could be pursued i.e. travel plan coordinators, travel packs, the forming of open space management companies and monitoring of contributions are all frequently included within developer obligations, but are not built or tangible infrastructure. Accordingly, such an artificial fetter on the definition of infrastructure would be wrong in law and have serious ramifications for the provision of necessary contributions not just for the police, but for other providers as well.
- 2.5 The broad approach is therefore to base the requirement for new BP infrastructure to serve the planned growth in the area on:
- Proposed housing growth in Bedford Borough, Central Bedfordshire and Luton Borough;
 - The proposals to expand the capacity of London Luton Airport;
 - A review of the capacity of BP's infrastructure (personnel equipment, vehicles and premises) to service that growth;

- The requirement for new BP infrastructure to serve that growth; and
- Quantify the costs of providing the new infrastructure by extrapolating from baseline data provided by BP.

2.6 The objective in doing so is to ensure that the BPIP explains what additional infrastructure is required to ensure that policing can be delivered to the new areas at the same levels as existing in the local authority area concerned. Therefore, the methodology is as follows:

Stage 1 – Establishing the Legal, Planning Policy and Financial Foundations of the BPIP

- 2.7 Whilst the BPIP represents the first step by BP in engaging with the planning system in Bedfordshire over the long-term, BP recognise that the preparation of the BPIP has not taken place in a vacuum.
- 2.8 If the methodology employed and its subsequent findings are to be robust and withstand testing, it is vital that they are utilised with a thorough understanding of the current legal and planning policy context in Bedfordshire, both existing and emerging.
- 2.9 In this respect, as Luton Borough Council's Local Plan (adopted November 2017) is extant and there are no plans for its review at the time of writing, its housing allocations will be used as the basis for subsequent calculations shown in the BPIP. These will be informed by the Council's subsequent Strategic Housing Land Availability Assessment (November 2019) to ensure that the data is as robust as possible.
- 2.10 Bedford Borough Council's Local Plan was adopted on 15 January 2020 and covers the period up to 2030. Given its recent adoption, the housing allocations can be used for the BPIP's calculations with full confidence.
- 2.11 The Central Bedfordshire Local Plan 2015 – 2035 was adopted in July 2021. The allocations within it are therefore used for the BPIP.
- 2.12 Whilst the data provided by the above Plans will underpin this BPIP, amendments in future years will have to consider two wider material factors. The first is the potential for a new terminal at Luton Airport, with the second being the on-going work by Government on the Oxford – Cambridge Arc that is intended to deliver significant numbers of new homes and economic growth. At the time of writing, it remains the case that there is no precise data available yet as to what these proposals will mean in practice for Bedfordshire. They are therefore described in Sections 7 and 8, but it will be for future iterations of the BPIP to consider the detailed implications for BP.

- 2.13 Simultaneously with all the above, it is very important for the three councils in Bedfordshire to appreciate why the funding granted to police forces does not cover the demands arising from the proposed development growth. A situation no different from other public services such as education, health and transport for example.
- 2.14 The first stage of the BPIP is therefore to clarify this context thoroughly to inform and provide the necessary foundations for all subsequent stages.

Stage 2 – The Existing Infrastructure of Bedfordshire Police

- 2.15 Stage 2 of the BPIP provides an assessment of the existing police infrastructure such as property, equipment, vehicles and other assets within the planning authority area concerned. BP hold detailed inventories and these have been interrogated to enable a comprehensive database to be compiled.
- 2.16 This stage also involves quantifying exactly how many police officers, staff and vehicles are specifically assigned to the planning authority area concerned. This ensures that infrastructure relating to support functions not directly to new development schemes is not inadvertently incorporated into the calculations.
- 2.17 Finally, the information collected at this stage identifies any asset/floorspace capacity likely to be yielded by property asset disposal. This is then accounted for by the subsequent calculations shown in the BPIP.
- 2.18 The overall objective of Stage 2 being to ensure that a close and careful analysis of the current levels of policing demand and deployment in each planning authority area is done. This ensures that subsequent calculations only reflect the precise need that would arise from the planned growth in each area. This in turn guarantees that the tests of specificity and direct relationship can be met at all stages of work in the BPIP.

Stage 3 – Police Infrastructure Required in Response to Housing Growth

- 2.19 This stage considers the infrastructure that will be required to police the new development proposed in the three planning authority areas of Bedfordshire through the use of pro-rata calculations. These are to the same standard as those used by the three councils when approving requests for funding towards affordable housing, education, off-site play contributions, maintenance of open space and transport.
- 2.20 The calculations shown are informed by the scale of housing growth specifically proposed by each of the following documents (as detailed in Stage 1 above):
- Bedford Borough Local Plan 2030 – (adopted January 2020)

- Central Bedfordshire Pre-submission Local Plan 2015-2035 (January 2018) and Proposed Main Modifications (March 2021)
- Luton Local Plan 2011-2031 (adopted November 2017)

2.21 The infrastructure costs which are identified are therefore directly related to the planned growth in the number of dwellings in the planning authority area concerned. As stated above, it is recognised that Central Bedfordshire's emerging Local Plan is subject to public examination at the time of writing and the contents of it may accordingly change. However, as the BPIP will be updated annually, it is intended that any significant changes will be accounted for during subsequent reviews.

2.22 The BPIP does not examine commercial or leisure development, as the NPCC methodology used here is not applicable to this type of growth.

2.23 What is presented is an accurate account of predicted demands arising from proposed residential development using existing data on what is currently required to service extant residential development. The data presented at this stage is specific and not capable of being more so.

Stage 4 – Annual monitoring and review

2.24 The BPIP will be subject to annual review and will be amended in the light of changing circumstances. Any amendments necessary would be subject to discussions with the three planning authorities.

3 THE LEGAL CONTEXT

- 3.1 The methodology used in this BPIP is in accordance with national best practice recommended by the NPCC, which has been found to comply with the statutory CIL Regulations by the High Court, Secretary of State and the Planning Inspectorate. The details of this are as follows:

High Court Judgement – 22 November 2016

- 3.2 The legal compliance of the methodology employed by the police when calculating infrastructure requirements and associated contributions in terms of compliance with the CIL tests was scrutinised by Mr Justice Green in *Jelson Ltd v Secretary of State for Communities and Local Government* [2016] EWHC 2679 (Admin). The learned judge concluded:

“...that there was an ample evidence base upon which the Inspector was entitled to base her conclusion (that the police contribution satisfied the CIL tests).” [81]

- 3.3 A copy of the judgement is enclosed in **Appendix 1** of the BPIP.

High Court Judgement – 27 May 2014

- 3.4 Assuming new populations is pragmatic stance used by all services responding to growth with contribution requests, not just the police. This was considered “obvious” by Mr Justice Foskett in the Judicial Review case brought by Leicestershire Police (**Appendix 2**). Attention is drawn to the following *obiter* content of the judgement:

“It is obvious that a development of the nature described (4,200 dwellings) would place additional and increased burdens on local health, education and other services including the police force. [11]

I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the “consumer view” of the issue. [61]

Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police. [61]

I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demand of policing the new area.” [63]

Secretary of State and Planning Inspectorate Decisions

- 3.5 As shown by **Appendix 3**, there are 12 Secretary of State decisions and 31 Planning Inspectorate appeal decisions that wholly support the methodology used to calculate police infrastructure needs and developer contributions required as a direct result. The most recent decision is dated 12 August 2021. Lest there be any doubt, the same methodology is used in the BPIP.
- 3.6 All the decisions confirm the lawfulness and compliance of the methodology with the statutory CIL tests, which followed scrutiny and analysis of it by the Planning Inspectors concerned and Secretary of State (where applicable). One of the most recent (09 November 2020) concerned a scheme in Nuneaton & Bedworth (see **Appendix 3** page 1), where at paragraph 41 the Inspector stated:

“...I have no grounds to find the intended affordable housing, and contributions to education, healthcare, primary care and policing would not be necessary, related to the development or proportionate...”

- 3.7 In the most recent Secretary of State decision (29 March 2018) (see **Appendix 3** pages 3-4), paragraph 33 of his report stated:

“Having had regard to the Inspector’s analysis at IR308-316, the planning obligation dated 1 August 2017, paragraphs 203-205 of the Framework, the Guidance and the Community Infrastructure Levy Regulations, as amended, the Secretary of State agrees with the Inspector’s conclusion for the reasons given in IR317 that the obligation (i.e. including the police contributions) complies with Regulation 122 of the CIL Regulations and the tests at paragraph 204 of the Framework.”

- 3.8 Furthermore, the appeal decisions set out in **Appendix 3** confirm that developer contributions for delivering police infrastructure and the methodology used to calculate them wholly comply with the NPPF.
- 3.9 Attention is accordingly drawn to the Barrow upon Soar decision (see **Appendix 3** pages 43-44) because although the Inspector was referring to the March 2012 edition of the NPPF, the following content is applicable to all subsequent editions:

“...the introduction of additional population and property to an area must have an impact on policing, in the same way as it must on education and library services, for example. Moreover, it also seems to me that the twelfth core planning principle of the Framework... can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to paragraph 69, should aim to achieve places which promote, inter alia, “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.” [291]

“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.” [292]

- 3.10 The Secretary of State then considered the Inspector’s recommendation and agreed with it, as stated by paragraph 20 of his report (see page 43 of **Appendix 3**).

4 THE PLANNING POLICY CONTEXT – EXISTING

National Planning Policy Framework (2021) (NPPF)

- 4.1 The currently adopted NPPF was published in July 2021. Paragraphs 8, 26, 32 and 93 together confirm that sustainable development means securing a safe environment through the delivery of social infrastructure needed by communities.
- 4.2 In this respect, paragraph 20 (b) specifically states policies should deliver development that makes sufficient provision for security infrastructure.
- 4.3 Paragraphs 16, 26, 28, 32 and 38 collectively envisage this being delivered through joint working by all partners concerned with new developments.
- 4.4 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 are essential local workers providing frontline services to the public, according to Annex 2.
- 4.5 These policy requirements are included in the NPPF (2021) because the Government has made clear that all stakeholders in the planning system should seek environments where crime and disorder and the fear of crime do not undermine quality of life, the health of communities and community cohesion (paragraphs 92 (b) and 130 (f)).

Adopted Development Plan for Bedfordshire

- 4.6 The currently adopted development plan for Bedfordshire, at the time of writing, comprises of the following:

Bedford Borough Council

- Bedford Borough Local Plan 2030 (adopted January 2020)
 - Allocations and Designations Local Plan (adopted July 2013)
 - Saved policies of the Bedford Borough Local Plan (adopted October 2002)
 - ‘Made’ Neighbourhood Plans – Carlton & Chellington and Oakley
- 4.7 The Local Plan (adopted January 2020) states that the Borough need to plan for the following quantum of development from 2015-2030:

- An objectively assessed need for housing (OAN) of 14,550 homes, which equates to 970 dwelling per annum over the 15-year period.
- 198ha of employment land to provide for existing employment in the Borough and an envisaged 6,900 new jobs.
- There is capacity to support 14,770sq.m of retail floorspace (comparison and convenience) by 2024, which increases to 38,540sq.m by 2030.

4.8 Policy 4S – ‘Amount and Distribution of Housing Development’ that a minimum of 3,169 new dwellings will be allocated and distributed as follows:

Table 1: Bedford Borough - Housing Allocations

Location	Approximate Number of Dwellings	Indicative Timetable
Bedford urban area	2,647	1,900 dwellings by 2030
Urban extensions	210	2015-30
Stewartby strategic brownfield allocation	1,000	100 dwellings by 2030 (18/03022/EIA)
Key service centres	2,000	2015-30
Rural service centres	260	2015-30
Bronham	500	2015-30
Clapham	500	2015-30
Great Barford	500	2015-30
Sharnbrook	500	2015-30
Carlton	25-50	2015-30
Harrold	25-50	2015-30
Milton Ernest	25-50	2015-30
Oakley	25-50	2015-30

Location	Approximate Number of Dwellings	Indicative Timetable
Roxton	25-50	2015-30
Turvey	25-50	2015-30
Willington	25-50	2015-30

- 4.9 Both the scale of planned growth and its geographical distribution will have implications for BP and its resources. This is because BP has a statutory duty to ensure adequate policing under Section 1 of the Police and Social Responsibility Act 2011, which is in turn complemented by Section 17 of the Crime & Disorder Act 1998 for local authorities to introduce a range of measures to prevent crime and disorder, to ensure community safety is considered when exercising its functions.
- 4.10 This means there is a commensurate requirement for infrastructure to enable and support the police in carrying out their statutory duties. As 14,550 dwellings are required to accommodate the growth in residents in the Borough by circa 33,000 people, the attendant increase in demands upon the services provided by BP is of operational significance. It is a demand that must be met. This BPIP accordingly utilises this core data of new housing and attendant population growth as the basis for calculating police infrastructure requirements.
- 4.11 It is important because as paragraph 8.1 of the Local Plan points out, the quality of living is affected to a great extent by surroundings, which in turn can influence the levels of crime that are experienced. Therefore, crime and community safety should be particular considerations in new schemes according to paragraph 8.9 of the Local Plan.
- 4.12 Alongside the above, the Local Plan contains several policies and provisions that recognise community safety and lend support to the need for police infrastructure to ensure sustainable development:
- Paragraph 5.4 confirms that the policies of the Local Plan should seek to reduce the fear of crime.
 - Policy 29 – ‘*Design quality and principles*’ states that new development should incorporate measures to promote community safety.
 - Paragraph 8.3 and Policy 30 – ‘*The Impact of development – design impacts*’ emphasise that planning applications should give particular attention to the quality of public space created by new buildings in terms of public safety.

- Policy 32 – ‘*The impact of development – disturbance and pollution impacts*’ stresses that development proposals should not give rise to crime and community safety concerns.
 - Policy 33 – ‘*The impact of development – infrastructure impacts*’ makes clear development proposals should not have a harmful impact (including cumulative impact with other development) on existing community facilities (i.e. emergency services). If they do, developers will be required to implement or contribute towards measures to mitigate adverse impacts.
 - Paragraph 12.11 does not directly reference the emergency services but does confirm that developer contributions for community facilities and fire related infrastructure may be sought.
- 4.13 The Council’s most recent Infrastructure Funding Statement (2019-2020) does not though include any police requirements within it.
- 4.14 However, the Council’s ‘*Planning Obligations – Supplementary Planning Document*’ (adopted July 2013) recognises at paragraph 2C.1 that policies facilities are part of the community facilities vital to the vibrancy and success of local communities.
- 4.15 The Council has had a CIL Charging Schedule in effect since 01 April 2014. This explains that CIL is charged at differential rates in the Borough according to the type of development and where it is located geographically. The funds that have been collected since 2014 have either been passed to Parish Councils, spent on education related projects, schools, roads or remain held by the Council within its ‘Infrastructure Fund’.

Central Bedfordshire Council

- 4.16 The Council’s currently adopted development plan comprises of the following:
- Central Bedford Local Plan 2015 – 2035 (adopted July 2021) (CBLP)
 - Residual policies and allocations from legacy planning policy documents that preceded the existence of Central Bedfordshire Council.
 - Made’ Neighbourhood Plans – Arlesey, Caddington & Slip End, Eaton Bray, Fairfield, Flitton & Greenfield & Pulloxhill, Northill, Pottton, Silsoe and Wrestlingworth & Cockayne Hatley
- 4.17 The Council only uses the Section 106 system to collect developer obligations. Whilst two public consultations were held on a Draft CIL Draft Charging Schedule in 2013 and 2015, there is currently no agreed timescale for future work on CIL.

4.18 The CBLP states that Central Bedfordshire needs to plan for the following quantum of development from 2015 – 2035:

- 39,350 new homes, of which 27,696 homes are already planned for or built. The gross total includes 32,000 new homes to meet the housing needs of Central Bedfordshire and 7,350 homes to meet the unmet housing needs arising from Luton;
- Deliver approximately 24,000 new jobs; and
- Deliver 197ha of employment land via strategic allocations.

4.19 These growth targets are informed by the fact that Central Bedfordshire currently has a population of approximately 278,000. The planned housing development, as stated above, will increase this significantly and therefore represents a new demand on policing services that must be met. The CBLP sets out the following allocations to deliver the required housing growth in Central Bedfordshire:

Table 2: Central Bedfordshire – Strategic Housing Allocations

Location	Approximate Number of Dwellings	Indicative Timetable
North of Luton (Town Extension)	3,600	2015-35
Marston Valley (New Villages)	5,000	2015-35
East of Arlesey (Town Extension)	2,000	2015-35
East of Biggleswade (New Village) (CB/20/00959/OUT)	1,500	2015-35
Houghton Regis North	7,000	2015-35

4.20 The East of Biggleswade scheme, promoted by UK Regeneration, was granted outline planning permission (CB/18/02458/OUT) on 06 February 2019. It is now, at the time of writing, subject to a second outline planning application (CB/20/00959/OUT), which was validated on 24 March 2020.

4.21 The Houghton Regis North Allocation is divided into 2 sites, both of which have received the benefit of the following outline planning consents:

- Site 1 – CB/12/03613/OUT (formally granted 02 June 2014) - Eastern side of the allocation extending from the M1 to the A5120 – 5,150 new homes and 202,500sq.m gross of additional development in Use Classes A1-A5, B1, B2, B8, C1, C2, D1 and D2 – Promoted by the Houghton Regis Development Consortium. It is noted that neighbouring Luton Borough Council challenged this consent in 2014 via the High Court and Court of Appeal in 2015 but were unsuccessful.

- Site 2 – CB/15/00297/OUT (formally granted 18 November 2015) - East of the A5 to the A5120 – 1,850 new homes and additional development in Use Classes A1-A5, B1, B2, B8, D1 and D2. Promoted by the Bidwell West Consortium
- 4.22 There have since been a significant number of applications to discharge the conditions attached to the above, as well as those attached to a subsequent reserved matters consent (CB/20/0049/RM)) in relation to Site 1.
- 4.23 The remainder of Central Bedfordshire’s housing land requirements will be delivered by 48 small and medium sites (hereafter referred to as non-strategic sites). Whilst all of these will place additional demands for policing services on BP, those that will deliver 150 homes or more will be particularly significant in this respect. These are as follows:

Table 3: Central Bedfordshire – Significant Non-Strategic Housing Allocations

Location	Approximate Number of Dwellings	Indicative Timetable
Land East of Barton-le-Clay	498	2015-35
Land North of Biggleswade (CB/19/04301/OUT)	401	2015-35
Steppingley Road	216	2015-35
Land West of Midland Mainline Railway	435	2015-35
Land West of Sundon Road	154	2015-35
Wixams Southern Extension	650	2015-35
Land East of Houghton Regis	355	2015-35
Northern Chamberlains Barn	175	2015-35
Land Rear of Station Road	244	2015-35
Alma Farm	159	2015-35

- 4.24 Alongside the housing allocations, the CBLP contains recognition of community safety and the need to reduce crime:
- Paragraph 14.6.3 states that the design of development should not impede access for emergency vehicles.
 - Paragraph 17.1.11 explains that the design of new development is expected to address community safety concerns.

- Policy HQ1 – ‘*High Quality Development*’ requires that layouts in new development should be designed to maximise surveillance and increase pedestrian activity within the public realm. This is to reduce opportunities for crime and the fear of crime.
 - Policy HQ2 – ‘*Planning Obligations and the Community Infrastructure Levy*’ confirms that planning obligations will be used to deliver social and community infrastructure. Whilst the emergency services are not specifically referenced, the policy does not exclude them either.
- 4.25 Notwithstanding the above, it is acknowledged that the CBLP is silent on the specific matter of developer contributions for police infrastructure.
- 4.26 However, as stated previously, the absence of adopted development plan policy is not a barrier to such contributions being made. This point was specifically considered and confirmed as such via the following appeal decisions:
- APP/C3240/W/16/314445 – Land East of Kestrel Close – 21 March 2017 (see **Appendix 3** page 15);
 - APP/G2435/A/14/2228806 – Money Hill, Ashby-de-la-Zouch – 15 February 2016 (see **Appendix 3** page 18).

Luton Borough Council

- 4.27 The Council’s development plan comprises of the Luton Local Plan 2011 – 2031 (adopted November 2017). The policies and supporting paragraphs in the Plan concerning the airport (see Section 6 of this BPIP), housing growth and the provision of police infrastructure all inform subsequent stages of this BPIP. The details of this are as follows:

Housing Allocations

- 4.28 Luton Borough Council set out in the Plan a net requirement for 17,800 additional dwellings to support the population growth of Luton over the period 2011-2030. The Local Plan itself makes provision for 8,500 net additional dwellings (425 per year) over the 20-year Plan period. This means there is an unmet need for 9,300 net additional dwellings, which will have to met in neighbouring local authority areas.
- 4.29 The most recent Strategic Housing Land Availability Assessment (November 2019) (SHLAA) states that between April 2011 and March 2019 4,325 dwellings were delivered.
- 4.30 Therefore 4,175 new homes are required by 2031 to meet the target of 8,500 required by the Local Plan. This equates to an average requirement of 348 units per year between 2019/20 and the end of the plan period.

4.31 The housing site allocations themselves and the timescales for their delivery are set out in Tables 4 and 5 below. Only those that will deliver 150 homes or more are listed, as it is these that are most significant from a police perspective. In cases where the site in question is subject to a live planning application, benefits from an extant planning consent and/or is under construction, this is stated:

Table 4: Luton Borough Council – Strategic Housing Allocations

Location	Approximate Number of Dwellings	Indicative Timetable
Napier Park	1,205	2018/19-2027/28 Under Construction 16/00900/FULEIA 16/01340/REM 18/01280/MMAMD
Power Court	1,200	2024/25-2028/29 20/01587/OUTEIA (live) 16/01400/OUTEIA (extant)
High Town	750	2018/19-2033/34 Under Construction
Creative Quarter (including Station Gateway-Northern Gateway-Land north of St. George Square)	600	2018/19-2033/34

4.32 The remainder of the Borough’s housing land requirements will be delivered by small and medium deliverable sites, as detailed by the SHLAA (hereafter referred to as non-strategic sites). Whilst all of these will place additional demands for policing services on BP, those that will deliver 150 homes or more will be particularly significant in this respect. These are as follows:

Table 5: Luton Borough Council – Non-Strategic Sites

Location	Approximate Number of Dwellings	Indicative Timetable
Land at Caleb Close	224	2019/20-2020/21 112 Under Construction 17/01040/FUL
1-11 Cumberland Street	209	2019/20-2020/21 112 Under Construction 17/01040/FUL
13-31 Dunstable Road	214	2021/22-2022/23 Extant Planning Permission 16/01499/FUL
Land opposite Whitbread House, Flowers Way	318	2021/22-2022/23 Extant Planning Permission 16/01649/FUL
Britannia Estate	294	2025/26-2029/30 Land Allocated
Land adjacent to Caddington Road & Newlands Road	340	2027/28-2028/29 Extant Planning Permission 17/00590/FUL

4.33 In addition to the growth detailed in Tables 4 and 5, the Local Plan sets out proposals for the provision of new employment sites and policies which aim to boost the evening economy (particularly in Luton). These activities, particularly the latter, will also have an impact on the services provided by BP.

4.34 Whilst the BPIP concerns Local Plan allocations primarily, in accordance with the methodology detailed at the outset, it has of course not been prepared ‘in a vacuum’. In this respect, a planning application (20/00147/OUT) was validated on 06 February 2020 for what is currently an allocated employment site located north of Kimpton Road in Luton. The scheme proposes 1,000 dwellings and associated infrastructure. Whilst in purely planning policy terms it does not concern an allocated housing site, the scale and significance of the proposed development means that the BPIP is obliged to account for it as an exceptional case.

4.35 The above accordingly explains why the following content in the Local Plan is important.

Provision of Police Infrastructure

4.36 The Local Plan contains the following paragraphs and policies relevant to the provision of police infrastructure:

- Paragraph 1.19 references the need to work efficiently with the Police and Crime Commissioner.
- Strategic Objective 5 (page 15) states that the policy on infrastructure delivery and developer contributions (Policy LLP39) should help to reduce crime and the fear of crime.
- Paragraph 8.9 highlights that the police are amongst the community services that will need to reduce costs and adapt to modern expectations.
- Strategic Objective 5 (page 75) confirms that the design of new development should help to reduce crime and the fear of crime.
- Policy LLP25 – ‘*High Quality Design*’ (part (x)) requires development to be designed to promote opportunities for reducing crime and anti-social behaviour.
- Strategic Objective 5 (page 79) states that landscaping should help to reduce crime and anti-social behaviour.
- Strategic Objective 11 (page 99) confirms that communications infrastructure should also help to reduce crime and the fear of crime.
- Strategic Objective 5 (page 109) states that infrastructure delivery should help to reduce crime and the fear of crime.
- Policy LLP39 – ‘*Infrastructure and Developer Contributions*’ does not provide specific support for developer contributions for the police but does not exclude them either.

Policy Regarding Developer Contributions for Police Infrastructure

4.37 Notwithstanding the planning policies highlighted above, it is acknowledged that most adopted development plan documents in Bedfordshire are silent on the specific matter of developer contributions for police infrastructure.

4.38 However, the absence of adopted development plan policy is not a barrier to such contributions being made. This point was specifically considered and confirmed as such via the following appeal decisions:

- APP/C3240/W/16/314445 – Land East of Kestrel Close – 21 March 2017 (see **Appendix 3** page 13);
- APP/G2435/A/14/2228806 – Money Hill, Ashby-de-la-Zouch – 15 February 2016 (see **Appendix 3** page 16).

5 THE PLANNING POLICY CONTEXT - EMERGING

5.1 The emerging development plan for Bedfordshire, at the time of writing, comprises of the following:

Bedford Borough

5.2 In this case there is a Local Plan in place that was adopted relatively recently in planning terms (January 2020). However, the Council has stated that changes to national planning policy, discussions around the Oxford to Cambridge Arc and the East West Rail Project means looking beyond 2030 (the end of the current plan period) is now necessary.

5.3 To take this forward the Council published an 'Issues and Options' paper for public consultation from 14 July - 04 September 2020. This stated that the Council may need to make new allocations to provide between 5,000 and 15,000 additional dwellings in the period 2030-2040. Then in the period 2040-2045 there may be a need to further allocate between 9,000 and 21,625 new dwellings.

5.4 In relation to the plan period 2030-2040 the Council put forward six possible options for how the housing growth might be delivered. These were:

- Urban Based Growth – In and around the Bedford / Kempston urban area, together with extensions to Rushdon and St. Neots.
- A421 Based Growth – Along the A421 road corridor, which could involve growth around the south side of Bedford / Kempston urban area and the expansion of villages between Stewartby and Great Barford.
- Rail Growth – Along the planned route of the East – West railway. This would take place alongside growth south and west of Bedford / Kempston urban area. There would also be potential for growth around Tempsford to the east.
- East-West Rail Northern Station – A new railway station to the north of Bedford, which would unlock growth in this location and link with a new settlement.
- Dispersed Growth – Development would be spread proportionately across the Borough. There would also be growth in and around the urban area and some expansion in all villages.
- New Settlement Based Growth – In addition to expansion of Wixams, up to four new settlements could be created potentially.

5.5 The next stage in the preparation of the new Local Plan was the public consultation on '*Strategy Options and Draft Policies*'. This ran from 29 June - 03 September 2021. This confirmed that the six options above had been shortlisted into four. These are:

- Option 2c – Development in and around the urban area, A421 transport corridor, rail based growth parishes and southern parishes. This would result in 12,500 new dwellings and 131ha of employment development.
 - Option 2b – Development in and around the urban area, A421 transport corridor, rail based growth parishes, southern parishes and 1 new settlement. This would result in 12,500 – 13,085 new dwellings and 151ha of employment development.
 - Option 2c – Development in and around the urban area, A421 transport corridor, rail based growth parishes and 2 new settlements. This would result in 12,500 dwellings and 151ha of employment development.
 - Option 2d – Development in and around the urban area, A421 transport corridor, rail based growth parishes, southern parishes, east parishes and 1 new settlement. This would result in 12,500 – 13,085 dwellings and 179ha of employment development.
- 5.6 The public consultation sought views on which of the above options should be taken forward, as well as setting out a new Vision for the Borough and proposing new development control policies. This BPIP will use the above figures to calculate BP’s infrastructure requirements in relation to them.
- 5.7 Alongside the proposed options for housing, the public consultation documents contains the following recognition of the need to promote community safety:
- Vision – Development growth should result in the creation of strong, safe and resilient local communities. Good design is integral to this.
 - Theme 4 – This states that better places means supporting a high quality, inclusive and safe built environment.
 - Paragraph 5.4 – It will be necessary for town centre development to make the area safer and enable the management of the night-time economy.
- 5.8 As all of these proposals clearly remain at an early stage and will be subject to further discussions over the coming months. As further information emerges, future iterations of the BPIP will take it into account.

Central Bedfordshire Council

- 5.9 Although the CBLP was only adopted in July 2021, it was done so on the understanding on the condition that a Partial Review takes place within 6 months. The purpose being to account for the emerging proposals from the Cambridge-Milton Keynes-Oxford Arc and reforms being made to the English planning system by Government. The outcome of this will be taken into account in future iterations of the BPIP.

6 LONDON LUTON AIRPORT – BACKGROUND AND PROPOSALS

- 6.1 When the April 2020 version of the BPIP was drafted London Luton Airport Operations Limited (LLAOL) were proposing a new terminal and associated works for London Luton Airport (LLA). The purpose of this was to increase the capacity of the airport from 18million passengers per annum (mppa) to 32mppa by 2039.
- 6.2 Since then the impact of the Coronavirus pandemic and resulting collapse in air travel has had a severe financial impact on LLA and Luton Borough Council (LBC), which owns it. This led to LBC having to borrow £60m from the Public Works Loans Board during 2020 to financially stabilise the airport. This amount meant that the overall total loaned to LLAOL by the Council is now approximately £400m.
- 6.3 LBC itself was also obliged to seek and secure £35m in emergency support from the Government this year in order to continue delivering services during 2020/21. A further loan of £14m was made by the Government to support the Council through the 2021/22 financial year. A significant part of the reason for the necessity of these loans is the loss of the annual dividend that LLAOL formally provided to LBC, which used to be worth circa £19m each year. It is now anticipated that the dividend will not be paid again for at least two years.
- 6.4 As a result, LLAOL now proposes to focus on improving the existing terminal rather than building a new one in order to achieve the desired increase in passenger numbers. Construction of a new second terminal is now planned for an undefined future date. LLAOL intend to hold a public consultation on these revised proposals, but have not confirmed a date for this
- 6.5 Against the above backdrop LLAOL submitted a planning application (21/00031/VARCON) on 11January 2021 seeking approval to increase the number of passengers using LLA from 18mppa to 19mppa. This is to be done through varying the cap imposed by planning permission 12/01400/FUL rather than by providing new built infrastructure. The application has been controversial, with objections from a variety of parties based mostly on environmental, noise and disruption grounds. At the time of writing there is no indication as to whether the application will be granted planning consent.

Key Policing Considerations with LLA Expansion

- 6.6 The growth of LLA will significantly on policing demands associated with migration crimes such as the trafficking of illegal goods, drugs, weapons and people. The extension of services to new destinations, including those used directly or indirectly by passengers to access countries in which there is civil unrest, war, significant terror threat and/or established illegal drugs cultivation will increase the threats associated with the arrival of high-risk individuals and illegal drugs from some destinations.
- 6.7 Any increase measured in mppa is likely to have a significant impact on armed policing and airport community policing in terms of capacity and capability. This means that unless mitigation measures and supporting infrastructure are provided, proposals to increase airport capacity will prejudice the ability of BP to deliver policing to LLA safely and effectively.
- 6.8 BP, as stated in the previous BPIP, are concerned that LLAOL has not identified policing as one of the main impacts of the expansion of the airport. This is why BP have communicated the following messages to LLAOL during direct discussions with them:

1. The Police Service Agreement (PSA) between BP and LLAOL will need to be reviewed to reflect any significant increase in footfall at the airport;
 2. Whilst the PSA will cover the direct costs of additional officers and their equipment, it will not (as matters stand at the time of writing) cover the increased costs associated with recruitment and training of the additional officers;
 3. Numbers of incidents either involving investigation and/or cell space will increase significantly, resulting in additional pressure on already over-burdened custody suites in Luton and Bedford;
 4. Crime categories likely to see the greatest increase in recorded incidents are public order and anti-social behaviour, theft/robbery of property and protests;
 5. Expansion of custody provision in Bedfordshire will therefore be a necessity;
 6. Delivery of new retail and licensed premises at the airport will increase pressure on the investigative resources of BP;
 7. As the dedicated BP team at the airport increases in numbers, the police dog team will have to expand proportionately. This means that kennelling and exercise areas for the dogs will need to increase as well;
 8. There will be a need to increase the levels of serious, organised and counter terrorism policing in the airport and the facilities necessary to facilitate these services;
 9. Realisation of the predicted increase in passenger numbers will inevitably mean that highway and transport links around and beyond the airport are put under increased pressure. This in turn means much greater demand for highways policing, which again is not presently covered by the PSA; and
 10. The increase in population generally around the airport will mean county-wide there will be an exponential increase on non-specialist policing services provided by BP.
- 6.9 Therefore, BP will continue to positively engage with LLAOL to ensure that additional resources and funding are put in place over the long-term to address policing issues. This in turn will ensure that BP can continue support the proposals for LLA as they come forward. The outcomes arising from this partnership work will be incorporated into future iterations of the BPIP.

7 THE OXFORD–CAMBRIDGE ARC

- 7.1 The Government describes the Oxford-Cambridge Arc ('the Arc') as the area between Oxford, Milton Keynes and Cambridge comprising of the following ceremonial counties:
- Bedfordshire
 - Buckinghamshire
 - Cambridgeshire
 - Northamptonshire
 - Oxfordshire
- 7.2 It is the stated intention of the Government to create a new spatial framework plan for the Arc area to deliver thousands of new jobs and build up to one million new homes. The underlying objective being realising its potential to become a world-leading corridor of growth and sustainability. In monetary terms, it is hoped that the Arc would generate £200billion by 2050.
- 7.3 To deliver the above the Government has stated that a Spatial Framework Plan and Arc Growth Body will be established, with the former being in place during 2022.
- 7.4 However, despite the stated ambitions by Government, there is little information available to explain how the above will be delivered in practice. This is a problem not just for BP, but for all stakeholders in the ceremonial counties concerned.
- 7.5 This has not changed, even with the current public consultation (at the time of writing) on the Vision for the future of the Arc. However, there will be further consultations at which it is hoped more information and clarity will be forthcoming. The overall consultation process that the Government envisages in relation to the Arc is as follows:
1. Development of a Vision for the future of the Arc: 20 July – 12 October 2021
 2. Towards a Spatial Framework – Described as the publication of potential options for consultation on how the vision might be delivered: Spring 2022
 3. Draft Spatial Framework – Final draft for public consultation: Autumn 2022
 4. Adopt of Spatial Framework by Government: By end of 2022
- 7.6 As a result of the above, BP have taken the decision that it will be for future iterations of the BPIP to consider and analyse the implications arising from the Arc.

8 THE EAST WEST RAIL PROJECT

- 8.1 Network Rail defines the project as re-establishing a rail link between Cambridge and Oxford (**Appendix 4**) to improve connections between East Anglia and central, southern and western England. The proposed route of the line is divided into three sections known as Western, Central and Eastern.
- 8.2 The project is being led and delivered by the East West Railway Company Limited (EWRCL) and Network Rail. EWRCL describes itself as being established by the UK Government in 2017 as a non-departmental public arms-length body.
- 8.3 Completion of the project will mean the building of what has hitherto been a very significant missing link in the UK's rail network. Namely, the connection of the Great Western, Chiltern, West Coast and Midland Main Lines north of London. This would mean passengers no longer having to go through London, as they do now, if they wish to cross between these main lines.
- 8.4 Delivery of the project is also intended to allow local authorities along the route to realise their ambitions for substantial economic growth based on the creation of new private sector jobs and the development of major areas of new housing.
- 8.5 On 12 December 2016 the first phase of the Western Section was completed, which involved upgrading the railway line between Oxford and Bicester. This work included building a new section of track to allow new direct passenger services to operate between Oxford, Bicester and London Marylebone.
- 8.6 Phase 2 of the Western Section will involve upgrading and reconstructing the existing sections of line between Bicester, Bedford, Milton Keynes, Aylesbury and Risborough. The purpose of this second phase is to allow passenger trains to run between Oxford, Bicester, Bletchley, Bedford, Milton Keynes, Aylesbury and London for the first time in more than 50 years. Construction work to deliver this phase started in 2020 and it is due to open in Spring 2024.
- 8.7 Phase 3 is the route between Bedford and Cambridge which, unlike earlier phases, will be an entirely new one. The EWRCL has identified a preferred route for this (from five options) that is via Sandy/St Neots and Cambourne, both of which will receive new stations. The EWRCL has stated that the following, in summary, were the main reasons for its choice of route:
- Avoid the most environmentally challenging areas and potential direct impacts on irreplaceable or sensitive environmental features, including heritage assets. It will instead allow opportunities for biodiversity net gain.
 - New links to Thameslink and Midland Mainline at Bedford, the East Coast Mainline at Sandy/St Neots and the West Anglia Mainline in Cambridgeshire will provide additional regional interconnectivity for people. This will make it easier to access places such as Kettering, Leeds, Norwich and Birmingham.
 - Utilising Bedford Midland Station will support plans to regenerate the town.

- Connect the growing population of Cambourne (and along the A428 Corridor) with environmentally sustainable transport. This in turn has the potential to integrate with improvements to South Cambridgeshire’s local transport network, such as the busway extension and Cambridgeshire Autonomous Metro.
 - The preferred route may support the delivery of more affordable housing in areas such as Bedford, Sandy, St Neots and Cambourne.
 - More local authorities supported the preferred route than the other options.
- 8.8 A public consultation on the detailed route for the Preferred Option took place from 31 March – 09 June 2021. The proposals for this ‘northern option’ means that the Wixams station promoted by the Bedford Borough Council (BBC) and other stakeholders would become part of a separate north-south railway route. This would enable passengers to access Thameslink services to and from London.

Development Growth Implications

- 8.9 BBC has stated that development growth around the East West railway would offer the following advantages:
- Supports services, facilities and businesses in urban areas, particularly in Bedford town centre;
 - Greatest potential for residents to make sustainable travel choices;
 - Increasing development density around the railway improves its viability;
 - Benefit from being close to existing and proposed road infrastructure improvements;
 - Close to existing employment areas with good connections;
 - Opportunities for high-tech employment development in association with East-West rail services in balanced communities with the option to live and work locally; and
 - Increases employment opportunities in the urban areas and sustainable methods of transport for those residents in most deprived areas.
- 8.10 However, at the time of writing, BBC has significant concerns with the proposed detailed route. In particular, with the proposed construction of a six track formation to the north of Bedford Station that would entail the demolition of circa 50 residential properties. Whilst this is noted, BP remain a neutral party and will respect the decision that is made by the stakeholders involved on this subject.
- 8.11 The above notwithstanding, there are no confirmed development growth locations associated with the East West Rail Project at the present time. Therefore, it is the intention that future iterations of the BPIP will take these into account as and when they become known.

9 THE FINANCIAL CONTEXT

Overview

- 9.1 The link between police funding and population growth is not a simple one, but it is a fact that an increase in population in an area does not lead to an overall increase in government grant. There are also no external taxation funds that the police can apply for to secure finance to provide infrastructure in response to development growth. These shortfalls are not remedied by council tax growth resulting from the delivery of new housing. This mirrors the situation faced by other public bodies such as education and health.
- 9.2 Nationally all police forces have experienced significant reductions in the funding they receive from national and local taxation sources. This was confirmed by the National Audit Office (NAO) in their report '*Financial Sustainability of Police Forces in England and Wales 2018*' (September 2018), which found that there has been a 19% reduction in real-terms from 2010/11 to 2018/19 for all forces. In BP's case specifically, the NAO found that between 2010/11 to 2018/19 BP has seen a drop of 16% if all funding sources are accounted for. If only central government funding (excluding local council tax support grant) is considered, BP has experienced a 30% reduction.
- 9.3 Part of the problem, ironically, is that BP is treated the same as all other Forces in England. This means that in national funding terms it is treated as a small rural force, despite the fact it faces severe 'urban' crime issues such as gang, gun & knife and drug problems emanating from Luton and the airport primarily.
- 9.4 However, whilst the Government expects all publicly funded bodies to manage with less money from the taxpayer (national and local) because of the national economic situation, it is not a national policy objective that they should be under-resourced or that they be deprived of funding from other sources. The planning appeal decisions detailed in **Appendix 3** confirm this.
- 9.5 This is important in a context where BP face a funding gap in the medium term (2021/22 – 2024/25) of some £8.1m. This is though being addressed through measures the Force is taking to 'get its own house in order', such as:
- Savings that arise from Priority Based Budgeting;
 - Savings that arise from further budgetary challenges;
 - Savings that are generated through new collaborative ventures in organisational and operational support services;
 - Savings achieved through further efficiencies in areas that are already collaborated with partners in the region;

- Potential collaboration with other blue light services; and
 - Potential internal reviews.
- 9.6 However, the result of the above is that capital programmes are funded generally from a mixture of asset disposal (a finite option), redirection of revenue funding (with implications for operational policing), general capital grants (that have significantly reduced in recent years), general reserves or prudential borrowing. Prudential borrowing is not a nil cost option though, with any borrowing requiring to be repaid from revenue/income. This means that repayments from this source have implications for the delivery of operational policing in a similar vein to redirection of revenue funding. This means these options can only be used to overcome very pressing issues with existing facilities, or to re-provide essential facilities like vehicles once these can no longer be used.
- 9.7 Whilst the Government does make special grants available from time to time, these are ring-fenced to tackle specific issues and unavailable to deliver infrastructure required to deliver policing services to planned development growth. A good example of this being the Bedfordshire Police and Crime Commissioner (BPCC) successfully securing grant funding totalling circa £5.0m during 2020/21 from the Government, which was to specifically to tackle the very serious existing gang, gun & knife crime issues in Bedfordshire.
- 9.8 This context is very similar to that faced by local authorities and other public services. Ironically though, as services like education and social care retract and if voluntary organisations fail to fill the gap left behind, it is the Police Services that is being asked to do this instead. This simply adds further significant financial pressure on Forces like BP that are already struggling to meet existing operational demands.
- 9.9 This BPIP is therefore being prepared to help the police's infrastructure requirements be recognised alongside all the other types of infrastructure, which is what the NPPF (2021) expects in its assertions about inclusive planning and the delivery of sustainable development by the planning system.
- 9.10 The following information has been provided by the Office of the BPCC and underpins the above statements:

National Funding

- 9.11 Since 2010 all police forces have faced significant reductions in resources because of the Government's on-going austerity programme. Although in 2020/21 and 2021/22 there were modest increases in the Police grant for BP, these have not off-set the cuts from preceding financial years.

- 9.12 The situation is though particularly acute in the case of BP, which receives one of the lowest Government grants per head of population. BP is also in the lowest quartile for budget and police officers per head of population. This reflects the fact that BP is funded as a small rural police force, but in truth faces the same policing challenges as the major metropolitan forces such as West Midlands Police or Greater Manchester Police.
- 9.13 This is combined with the fact that during the period of previous and current Spending Reviews BP has implemented spending reductions of circa £39.1m since 2011/12. However, a funding gap over the medium term (2021/22 – 2024/25) remains of circa £8.1m. This confirms the financial pressures upon BP in meeting its existing operational requirements and the lack of any central funding available to address pressures arising from development growth.
- 9.14 For the avoidance of doubt, this funding gap remains despite Government raising the central grant to BP by circa £4.3m for 2021/22 (supporting their pledge to increase officer numbers).
- 9.15 The amount quoted for the funding gap is also an optimistic forecast, as at the time of writing it is not understood how much of an impact COVID-19 will have on the number of households able to pay council tax bills without support.
- 9.16 The backdrop to this is that BP receives approximately 62% of its funding from central Government and 38% from local taxation. As recognised by the NAO, this means that BP is particularly affected by central government funding cuts, given that the availability of local funding for BP is proportionally lower relative to many other forces nationally. The following information explains the process leading to this outcome:

How Central Government Funding is Allocated

- 9.17 The distribution of central government grant itself is calculated by the Police Relative Needs Formula. The first stage of the formula is to divide funds between the different activities that the police undertake. These activities, or workloads, can be broken down into five key areas:
- Crime (of which there are seven sub-categories)
 - Incidents (e.g. public disorder);
 - Traffic (e.g. assistance at road traffic accidents);
 - Fear of Crime (e.g. public reassurance); and
 - Special Events (e.g. football matches).
- 9.18 A portion of total funding is also distributed according to population sparsity, to address the specific pressures created by the need to police rural areas.
-

- 9.19 The second stage is to divide funding for each of these workloads between the 43 police forces of England and Wales. To do this 'workload indicators' are calculated to estimate how much work each police force is expected to have in each of the five key areas compared to other forces. These estimates are calculated using socio-economic and demographic indicators that are correlated with each workload. Indicators of workload are used rather than data on actual recorded crime to account for known variations in recording practices. This also ensures that there is no incentive for forces to manipulate figures.
- 9.20 The formula then takes a basic amount per residents and a basic amount for special events, and top-ups for the five key areas, sparsity and area costs (which takes account for regional differences in costs).
- 9.21 The final stage that the top-ups etc are weighted and use specific categories of population, rather than straight-forward population figures, to determine formula grant allocations to each of the 43 Forces. These categories include the population on various benefits, long-term unemployed, student housing, overcrowded households, hard-pressed households, residents in terraced accommodation and many more beside.

Key Problems with the Police Relative Needs Funding Formula

- 9.22 Although the Government's funding formula is influenced through the allocation of a basic amount per resident, population growth does not lead to an increase in central government funding for BP or other forces.
- 9.23 This is because alongside the 3-year time delay between recognising population growth and this being fed into the funding formula, the overall pot of funding available to all forces through central government grant is limited and declining as part of the Government's fiscal policy. This is as per detailed above.
- 9.24 Therefore, changes in general population or the specific population categories does not increase the overall funding available through central government. All it does is affect the relative distribution of a finite pot between forces. The 30% cut in BP's funding from central government between 2010/11 to 2018/19 underlines this point.
- 9.25 The above problem is combined with others, which were identified in July 2015 by the '*Committee of Public Accounts*'. They found that the formula did not consider the full range of demands on police time, the efficiency of forces, levels of financial reserves held, or the proportion of funding that forces receive from central government relative to local funding, which included funding from the council tax contributions and the local council tax support grant.

- 9.26 Furthermore, as confirmed by the NAO, since 2010 central government funding has been subject to a process known as ‘damping’, whereby an equal percentage reduction has been applied to all forces in England and Wales, regardless of the outcome of the formula. The effect of this was particularly detrimental in the case of BP and other Forces more dependant on central government funding.
- 9.27 All of these problems led to the Home Office’s accounting officer telling the July 2015 meeting of the ‘Committee of Public Accounts’ that the national funding formula was:

“Ineffective and detached from the real demands on policing.”

- 9.28 This remains the case because whilst proposals to amend the funding formula were mooted, they were never implemented. This led to the NAO concluding in 2018 that national funding continues to not match need in every force area in England and Wales.
- 9.29 It should though be highlighted that there was some respite for BP via two special grant applications during 2020/21 totalling £5.0m. However, this money is only to fund exceptional costs incurred by BP in relation to organised crime. In turn this ensures that exiting policing services to Bedfordshire as it is now can be maintained. There is none available to provide infrastructure in response to the planned development growth in the three council areas.

Local Funding

- 9.30 BP (precepting body) places a demand or precept on the three councils in its area (billing authorities) for a sum of money to be raised through the council tax. The amount to be raised is divided by the Council Tax Base (CTB) or number of households to arrive at an average Band D council tax, from which all other bands of council tax are determined.
- 9.31 The growth in the council tax or the amount each household pays is decided by the Police and Crime Commissioner, having regard to the need to consult the public where the proposed increase in the precept is above a prescribed threshold (£15.00 on a Band D bill as of 2021/22).
- 9.32 In this respect, the Bedfordshire Police and Crime Panel approved a precept increase of £15 a year for a Band D home (£1.25 per month) on 02 February 2021, which will give BP £3.0m of extra funding for 2021/22. This helps to support the recruitment of new officers, but will not negate the need for BP to continue making savings and keep the service it provides to the public under review.

- 9.33 The above financial boost therefore is purely about maintaining BP's existing number of officers and service capabilities though. The increase in officer numbers is only achievable because of the Government's national drive (Uplift) Had the money not been available, BP would not have been able to seek to recruit and retain 400 police officers overall in the period 2019/20 to 2022/23, which in turn would have led to further serious service degradation in frontline capacity such as neighbourhood & community policing, cyber-crime, gangs & guns and child & vulnerable adult services.
- 9.34 It is not possible to raise the Council Tax precept beyond the current £15 threshold without calling a public referendum. BP remain the only Force in England & Wales to have tried this, when a 15.8% (£24.80) increase was proposed for 2015/16. The poll was held on 07 May 2015, with 30.5% (91,086 voters) in support of the proposal and 69.5% opposed (207,551 voters).
- 9.35 There is potential for the council tax yield to increase simply through a growth in the CTB. The number of taxpayers being set by the councils in January each year. However, these figures can be lower than expected rather than higher. A case in point was that BP's financial modelling has been based on a population increase of 2%, but the final figure confirmed by the Councils in January 2019 was 1.96%, which reduced BP's funding by £15,000. This was then compounded by a reduction of 0.55% as a result of COVID-19 impacting on the 2021/22 budget.
- 9.36 It should also be noted that the CTB is reduced for discounts and exemptions provided under Council Tax Reduction (CTR) schemes and may also be affected by collection rates. Therefore, a growth in households might not lead to a growth in council tax yield where those households benefit under CTR. This notwithstanding, any additional monies collected will be spent by BP on revenue costs and would not be available to deliver new infrastructure in response to development growth. Therefore, if such money was diverted, this would diminish monies available to fund existing policing services i.e. 'robbing Peter to pay Paul', which would clearly be unacceptable.

Savings

- 9.37 All the above means that BP faces a funding gap over the medium term (2022/23 to 2024/25) of some £8.1million. Against this backdrop, BP will make use of its reserves to ease the on-going effects of budgetary reductions. It must though be emphasised that BP are obliged to hold a minimum level of general reserves, but neither the NAO or the Chartered Institute of Public Finance & Accountability (CIPFA) stipulate what this should be in practice.
- 9.38 The BPC is advised by the Chief Finance Officer to hold a general reserve of at least £3.5million. This is to ensure that BP can meet the level of anticipated risk for expenditure arising from exceptional circumstances, e.g. a terrorist incident.

9.39 This means that over the next four years the reserves will be made use of each year by the BPPC to support each year's budget. No contributions to the reserves will be made either. Colloquially therefore, 'the family silver is in the process of being sold and now the cupboard is bare'. There is consequently no funding available from the reserves that could be used to fund the infrastructure that will be required to serve the planned growth in the three council areas of Bedfordshire.

Other Factors

9.40 Policing bodies are funded outside the Business Rates Retention Scheme. As a result, BP does not benefit from the growth in local businesses that might accompany a growth in the population and the number of households. However, a growth in local business places significant demands on police forces like BP.

Conclusions on Funding

9.41 Like many other public sector organisations, BP have seen a real terms reduction in grant funding that has necessitated changes to the policing model. At the same time the demands on BP increase. This is due to the proximity of Bedfordshire to London and major changes in crime and its consequent demands, particularly regarding organised gangs, terrorism, cybercrime and child sex exploitation. By way of underlining the severity of these issues, Bedfordshire is ranked third nationally in terms of the terror threat level.

9.42 Against this grim backdrop and during the period 2010/11 to 2018/19, BP's funding has fallen 16% in real terms. This has meant the Force having to find savings of £32.1million during this period. It must also find savings of a further £8.1m over the forthcoming medium term (2021/22 to 2023/24). It is emphasised that these totals are net of the one-off annual grants that BP has been able to successfully secure from Government to help alleviate immediate operational pressures.

9.43 The Government states that it trusts Police and Crime Commissioners and Chief Constables will do everything in their power to drive the required efficiencies, safeguard the quality of policing and continue to reduce crime. Whilst BP will always strive to meet these challenges and take measures to 'keep its own house in order', matters remain very difficult.

9.44 Increases in local population and the number of households do not result in an increase in central government grant funding, as explained in detail above. Furthermore, whilst there might be growth through council tax generated by an increase in the CTB, this funding would not be available to fund the infrastructure that would be required to effectively police the proposed areas of new development across Bedfordshire.

- 9.45 Therefore, it is necessary and reasonable to secure developer contributions for policing infrastructure, due to the direct link between the demand for policing services and changes in the operational environment beyond BP's control i.e. housing growth and the subsequent and permanent impacts it has upon policing.
- 9.46 Securing contributions means that the same level of service can be provided to residents of new development as it is to existing residents; without compromising frontline services. The consequence of no funding is that existing infrastructure will eventually become stretched to breaking point and none of the communities that BP serve will receive adequate policing. This is clearly not in the interests of anyone. Consequently, funding for BP infrastructure via developer contributions is demonstrably essential and justified.

Stage 2

Existing Police Infrastructure in Bedfordshire

10 OVERVIEW OF BEDFORDSHIRE POLICE

- 10.1 As the name implies, BP covers a single county that whilst being one of the smallest geographically (477 square miles), is one of the most diverse nationally with 23% of its 670,000 residents from minority ethnic backgrounds, with many living in and around the towns of Luton and Bedford.
- 10.2 The Force is required to deal with a complex mix of volume crime, serious crime, drugs, gangs, knife crime and terrorism threats. In the period April 2018 – March 2019 the Force recorded 8,698 arrests, 55,700 crimes, 108,000 emergency 999 calls and received 287,000 calls via the 101 service.
- 10.3 BP's community, response and investigation teams serve the unitary authorities of Luton, Bedford and Central Bedfordshire. Community policing specifically is delivered from 8 Community Hub areas, with each team led by a Sergeant focused on addressing key areas of concern to the local community.
- 10.4 At a regional level BP leads the serious and organised crime effort through the Eastern Region Special Operations Unit (ERSOU) and the counter terrorism response through the Eastern Counter Terrorism Intelligence Unit (CTIU) on behalf of Cambridgeshire, Hertfordshire, Essex, Norfolk, Suffolk and Kent.
- 10.5 Undertaking the above work means the Force currently comprises of 1,103 police officers, 53 PCSOs and 575 police staff (this excludes those officers that work across the Bedfordshire, Cambridgeshire and Hertfordshire borders). However, the Bedfordshire Police and Crime Commissioner has confirmed their intention to fully recruit their share of the national 20,000 police officer uplift, by March 2023.
- 10.6 Delivery of neighbourhood or local policing by the above personnel to Bedfordshire is done by via two designated 'Policing Areas' (PAs) called 'North' and 'South'. Bedford Borough and Central Bedfordshire council areas fall within the North PA, whilst Luton Borough is within the South PA.
- 10.7 The two Policing Areas are in turn divided into the aforementioned network of 8 Community Hubs (including LLA), 18 Local Community Policing Teams, or LCPTs, which send out neighbourhood patrols that follow 194 'Beat' localities. These are shown in the map enclosed in **Appendix 5**.
- 10.8 Therefore, BP has demonstrably absorbed the growth in population and household numbers to date in the County through effectively utilising its existing infrastructure and resources. As discussed in Part 1 of this BPIP, it will not be able to continue to absorb further growth without increased capacity in its estate, human resources and vehicle fleet to support its operational activities.

10.9 As indicated at the outset, BP's infrastructure for the purposes of the BPIP is accordingly defined as the following:

- The provision of fixed police accommodation;
- Set-up costs for additional staff and related equipment; and
- New vehicles.

10.10 The requirement for this infrastructure is related to both the anticipated growth in population (because more people will require more policing) and the planned growth in development which will require policing across a greater geographical area. The planned development growth is principally new housing, but includes also employment, leisure, tourism related and other forms of growth.

10.11 The two subsequent sections in this part of the BPIP therefore consider the existing capacity of the three types of BP infrastructure in the County.

11 EXISTING POLICE ESTATE IN BEDFORDSHIRE

11.1 There are different types of police buildings and these should be understood as follows:

Police Headquarters

11.2 Located in Kempston, this functions as BP's overall command and control centre. It encompasses offices, training facilities, a call management centre, facilities for specialist police units and a custody suite. The buildings at the site are the designated location for 912 police officers and support staff on shift.

Police Station

11.3 This is a facility capable of accommodating approximately 50 police officers and staff working on shift. A typical building of this type would include offices, interview rooms, data rooms, briefing rooms and storage for equipment. They typically occupy sites of circa 1ha.

Police Post

11.4 These can be found as rooms within larger buildings, or a small free-standing facility. They provide accommodation for 3-10 police officers and Police Community Support Officers (PCSOs) on shift. They are not always for public use. In size they can be between 150 and 200sq.m. This is sufficient for an interview room, separate offices for sergeants and inspectors, a general office, locker space, toilets and a shower.

Custody Suites

11.5 These are designated areas of police stations for the purposes of detaining and processing people who are suspected of committing a criminal offence. As well as cells, custody suites also typically comprise interview, medical and consultation rooms. There will also be facilities to allow video conferencing and identification parades. For the avoidance of doubt, custody suites should not be confused with prisons. The former is purely for the purpose of temporarily detaining those suspected of committing an offence, whilst the latter is for the purpose of enabling a person to serve a sentence imposed on them by a court of law.

11.6 A map that shows the location of BP's existing estate is included in **Appendix 6**. It should be noted that this BPIP focuses only on that part of BP's estate directly delivering local or neighbourhood policing. This is because requesting developer contributions towards premises expansion can only be fully justified in the context of CIL Regulation 122 where it has a direct relationship with housing and population growth. Further details are below:

Bedford Borough

11.7 The estate in the Borough delivering local policing comprises of the Force HQ, one police station and two police posts. These are as follows:

- Force Headquarters, Woburn Road, Kempston
- Police Station, Halsey Road, Kempston
- Police Post, Lime Street, Bedford
- Police Post, Barker Lane Fire Station, Bedford

11.8 Custody provision for the Borough is provided by the Headquarters site only. However, this 18-cell unit is reliant on temporary permissions and is accordingly unsuitable for long-term use. Hence BP submitted the following planning application (20/00278/MAF) for a permanent 22-cell custody suite and associated infrastructure on 07 February 2020:

“Erection of a permanent custody suite (sui generis) building with ancillary office space, alterations to internal vehicular circulation and car parking and creation of new vehicular access onto Woburn Road, plus ancillary infrastructure and hard and soft landscaping.”

11.9 Planning permission was granted on 29 May 2020. At the time of writing construction is well underway on site, with the new building expected to be operational during Spring 2022. The project is being part funded by the disposal of the former Greyfriars Police Station in Bedford.

11.10 The former Greyfriars Police Station is currently unoccupied, with the Force intending to dispose of the building. To facilitate this, planning permission (19/01155/MAF) was granted by Bedford Borough Council on 25 November 2019 for the following development proposed by BP:

“The partial demolition, refurbishment and change of use of the existing Police Station (Use Class Sui Generis) to 23.No flats (Use Class C3), 1 No Retail units (Use Class A1/A3).”

11.11 This was subsequently followed by BP submitting outline planning application 20/00140/MAO for the following, which at the time of writing is still to be determined by the Council:

“Outline application (all matters reserved) for the demolition of the former Greyfriars Police station and ancillary buildings and redevelopment to provide up to 105 residential units (C3), incorporating up to 850sq.m ground floor commercial space and/or community uses (Use Classes A1, A2, A3, A5, B1, D1, D2) together with ancillary amenity and greenspace, provision for access and car parking and alterations to the public highway”

11.12 At the time of writing, discussions with potential private bidders for the site are taking place. The outcome of this will be detailed in the next iteration of the BPIP.

11.13 Turning to the Police Posts listed; they are not necessarily occupied on a full-time basis but instead act to supplement the existing network of active Police Stations. Their purpose is to provide facilities for BP to undertake their operations across a wider geographical area and are used for a wide variety of policing purposes.

Central Bedfordshire

11.14 The estate in Central Bedfordshire delivering local policing comprises of two police stations and four police posts. These are as follows:

- Biggleswade Police Station, 5 Station Road
- Dunstable Police Station, West Street
- Police Post, Houghton Regis, Sundon Road
- Police Post, Leighton Buzzard Community Fire Station, Lake Street
- Police Post, Ampthill Community Fire Station, 30 Oliver Street
- Police Post, Toddington Community Fire Station, Dunstable Road

11.15 It is important to note that only Dunstable Police Station of the above is accessible to the public via a front counter.

11.16 The other facilities provide bases for police officers and PCSOs to conduct patrols of local neighbourhoods.

11.17 Custody provision for Central Bedfordshire is provided by the two designated suites at the Force's HQ and Luton Police Station. The custody suites at Dunstable (11 cells) and Ampthill (3 cells) closed approximately five years ago.

11.18 The former Leighton Buzzard Police Station was sold by BP in November 2016 to Central Bedfordshire Council. At the time of writing, the existing buildings at the site are to be demolished and replaced with a 68-bed care home by the Council. This follows the grant of outline planning permission for this on 11 October 2017 (CB/17/03683/OUT). To ensure the continuation of policing services to Leighton Buzzard, a Police Post was established within the existing Leighton Buzzard Community Fire Station through partnership work with Bedfordshire Fire & Rescue Service (BFRS).

11.19 The custody suite at Ampthill was part of the former Ampthill Police Station, which was sold to McCarthy & Stone in 2016, who in turn obtained full planning permission (CB/17/00056/FULL) on 18 December 2018 for the demolition of the existing buildings at the site and development of a 30-unit retirement living complex. Redevelopment of this site was completed in January 2021. As with Leighton Buzzard, Police Posts were established in Ampthill Community Fire Station and Toddington Fire Station in partnership with BFRS to ensure the continuation of policing services in the area.

Luton Borough

11.20 The estate in Luton Borough, delivering local policing, comprises of one police station and two police posts as follows:

- Luton Police Station, Buxton Road
- Police Post, Luton Town Hall, Luton
- Police Post, Community and Enterprise Resource Centre (CERC), Marsh Farm, Luton

11.21 Luton Police Station has a publicly accessible front counter and a 21-cell custody suite, which serves the Borough and Central Bedfordshire, as stated above.

12 EXISTING POLICE STAFF AND VEHICLE RESOURCES IN BEDFORDSHIRE

Staffing Resources

- 12.1 As stated previously, the Force currently comprises of 1,103 police officers, 53 PCSOs and 575 police staff. The total number of officers has been possible due to extra funding (£3m) becoming available following the police's share of the Council Tax precept increasing by £15 a year for a Band D home. This enabled the expansion of patrol policing. Therefore, it is the figure of 1,103 that is used as a basis for calculating the additional staffing requirements to serve the planned growth in Bedfordshire.
- 12.2 Whilst delivery of neighbourhood or local policing by the above personnel to Bedfordshire is done by via designated 'Policing Areas', the reality is that they will deploy across the County as and when the need arises. This is because it is no longer the case that a single local police station will cover all local needs. In practice, a comprehensive range of functions and teams will be called upon to deliver services to a given development throughout its lifetime. These personnel will continually cross back and forth across local authority boundaries as required.
- 12.3 This is because the nature police activity is such that it is not possible to ring-fence police operations to a particular area, district or even county. Victims, perpetrators and officers will not discriminate between administrative boundaries. Moreover, the police function includes the various support staff, many of whom will provide services across BP's area.
- 12.4 The table below shows the current budgeted posts for police officers that are currently serving Bedfordshire:

Table 6: Police Officer Numbers in Bedfordshire - Existing

Department	Budgeted Posts
ACPO & Strategic Improvement	5
Intelligence	155
Strategic Improvement	5
People Portfolio	26
Crime & Police Protection Unit	340
Local Policing	378

Department	Budgeted Posts
New Recruits	157
Total	1,103

12.5 The table below shows the current budgeted posts for police staff that are currently serving Bedfordshire:

Table 7: Police Staff Numbers in Bedfordshire - Existing

Department	Budgeted Posts
ACPO	8
Intelligence	66
Crime & Police Protection Unit	65
Local Policing	35
Public Contact & Crime Management	208
People Portfolio	7
Strategic Improvement	54
Criminal Justice & Custody	43
Communications	16
Estates	22
Finance	13
Legal Services	5
Transport	4
Office of the Police and Crime Commissioner	29

Department	Budgeted Posts
New Recruits	0
Total	575

Vehicle Resources

- 12.6 In managing and responding to crime a number of different vehicles can be deployed ranging from General Response Vehicles (GRVs or patrol cars), unmarked general support vehicles, Public Service Unit vans and minibuses, scientific (e.g. Scenes of Crime Officers (SOCO)) vehicles, pursuit vehicles – 4x4 and high speed, motorcycles and so on.
- 12.7 Information supplied by BP confirms that current fleet deployment to Bedfordshire is 168. More details on this are provided in the sections contained within Stage 3 of this BPIP.

Stage 3

Police Infrastructure Required in Bedfordshire

13 POLICE INFRASTRUCTURE REQUIRED IN BEDFORD BOROUGH

- 13.1 Policing is provided by the North Bedfordshire PA, which covers Bedford Borough, along with Central Bedfordshire. The PA is led by Superintendent Jaki Whittred. As stated previously, the PA covers two Boroughs because it reflects the integrated nature of modern policing, whereby a comprehensive range of functions and teams will be called upon to deliver services to developments throughout the Borough.
- 13.2 Where additional development is proposed, BP will seek to deploy additional staffing and additional infrastructure at the same level that is required to deliver policing to the Borough currently. It would be complacent not to do this because without additional support unacceptable pressure will be put on existing staff and police infrastructures, which will seriously undermine BP's ability to meet the policing needs of the new developments and maintain the current level of policing to the rest of the Borough and the PA as a whole. The impacts of all the new developments being proposed in Bedford Borough are so significant that they cannot be met without additional staff deployed at a level consistent with the current policing of existing settlements and estates.
- 13.3 As has been detailed earlier in this BPIP, there is no spare capacity in BP's existing infrastructure to accommodate new growth and additional demand. The funding strictures on BP have already been demonstrated in Section 9. Therefore, if additional infrastructure is not provided alongside new houses by the developers in question, new schemes will impact on the ability of the police to provide a safe and appropriate level of service and to respond to the needs of the local community in an effective way. That outcome would be contrary to planning policy, caselaw and planning appeal precedent, as explained in Sections 3 and 4 of this BPIP.
- 13.4 In the end, failure to provide necessary police infrastructure would undermine the ability to create a safe and accessible environment where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion across the Borough. These goals cannot be achieved without adequate policing. The additional infrastructure required by BP is accordingly as follows:

Equipping Police Staff in Bedford Borough

- 13.5 In considering personnel costs, we have only included the cost of staff set-up for additional members of staff i.e. recruitment, uniform, personal equipment, basic office furniture and IT. An allowance has also been made for basic training of additional officers.
- 13.6 We have used information provided to us by BP concerning the costs of standard neighbourhood police officers and support staff only, rather than specialists such as an authorised firearms officer or forensic scientist. The set-up costs are therefore:

Table 8: Police Officer Set-up Costs

Cost Type	Set-up Cost Per Officer
Recruitment	£1,060
Training	£4,400
Uniform & Personal Equipment	£981
Standards equipment (IT and Furniture)	£1,642
Total Set-up Cost Per Neighbourhood Officer	£8,083

Table 9: Police Staff Set-up Costs

Cost Type	Set-up Cost Per Officer
Recruitment	£1,060
Standards equipment (IT and Furniture)	£1,642
Total Set-up Cost Per Police Staff Member	£2,702

13.7 At March 2021 total floorspace occupied by BP to delivering policing to the Borough is 9,144sq.m. BP employ 1,678 staff (1,103 officers and 575 staff) to do this. Existing households in Bedford Borough was 75,650 (Bedford Borough estimate) and 104,399 in Central Bedfordshire (2011 census). 535 police officers (Local Policing and New Recruits) deliver policing to these households.

13.8 The ratio of households to staff for the North PA is therefore 337:1

13.9 BP employ staff to officers in local policing at a ratio of 0.65 to 0.35 (out of a total of 1,103 officers and 575 staff). Therefore, the average cost of equipping a new member of staff is

- $£8,083 \times 0.66 = £5,335$
- $£2,702 \times 0.34 = £919$
- Average cost of equipping a new member of staff (£5,335 + £919) is £6,254

13.10 In terms of the calculation on a development by development basis, this is the number of proposed homes divided by the ratio of households to staff in the North PA (337:1). Together with the other figures above, the additional staff (and associated cost) needed to deliver local policing services to all the housing developments proposed in Bedford Borough (see Section 4 of this BPIP) is as follows:

Table 10: Staffing Levels Required – Set-up Costs – Bedford Borough (Adopted Local Plan)

Location	No. Homes	No. Staff Required	Cost Attributable
Bedford urban area	2,647	8	£50,032
Urban extensions	210	1	£6,254
Stewartby strategic brownfield allocation	1,000	3	£18,762
Key service centres	2,000	6	£37,524
Rural service centres	260	1	£6,254
Total	6,117	20	£118,826

13.11 The figures above represent the maximum number of dwellings that could be delivered in Bedford Borough. However, the total is likely to be significantly lower than this during the plan period, a fact specifically acknowledged by Policy 4S – ‘Amount and Distribution of Housing Development’ of the Bedford Borough Local Plan 2030 (adopted January 2020).

13.12 Turning to the ‘Strategy Options and Draft Policies’ consultation document published in June 2021, the staffing levels required in relation to the four strategic options is as follows:

Table 11: Staffing Levels Required – Set-up Costs – Bedford Borough (Emerging Local Plan)

Location	No. Homes	No. Staff Required	Cost Attributable
Option 2a			
- Urban area	1,500	5	£31,270
- Adjoining urban area	1,500	5	£31,270
- Rail based growth	7,500	22	£137,588
- South	2,000	6	£37,524
Total	12,500	38	£237,652
Option 2b			
- Urban area	1,500	5	£31,270
- Adjoining urban area	1,500	5	£31,270
- Rail based growth	5,500	16	£100,064
- South	1,500	5	£31,270
- Little Barford New Settlement; or	3,085	9	£56,286
- Wyboston New Settlement	2,500	7	£43,778
Total	12,500 or 13,085	38 or 40	£237,652 or £250,160
Option 2c			
- Urban area	1,500	5	£31,270
- Adjoining urban area	1,500	5	£31,270
- Rail based growth	3,915	12	£75,048
- Little Barford New Settlement	3,085	9	£56,286
- Wyboston New Settlement	2,500	7	£43,778
Total	12,500	38	£237,652
Option 2d			
- Urban area	1,500	5	£31,270
- Adjoining urban area	1,500	5	£31,270
- Rail based growth	5,500	16	£100,064
- South	750	2	£12,508
- Little Barford New Settlement; or	3,085	9	£56,286
- Wyboston New Settlement	2,500	7	£43,778
Total	12,500 or 13,085	38 or 40	£237,652 or £250,160

13.13 Although it is unknown at the time of writing which of the four development growth options will be chosen, this BPIP is obliged to assume the higher figures will come forward as a 'worst case scenario' (i.e. in addition to the currently allocated sites). Future iterations of the BPIP will be updated as the picture in Bedford Borough becomes gradually clearer. This is the only way to guarantee that provision for the additional staff and the equipment they will need to police new developments can be planned for. Without doing this, there is a risk of insufficient numbers of officers attending the various new developments with less than adequate equipment. This would clearly lead to unnecessary risks to themselves and the occupiers being served.

13.14 Compliance with the statutory tests of CIL Regulation 122 is therefore demonstrated as follows:

Are the contributions specified necessary to make developments in Bedford Borough acceptable in planning terms?

13.15 Crime and community safety are planning considerations and this is recognised by the content of the adopted and emerging Council's Local Plans (see Sections 4 and 5 of this BPIP). The NPPF (2021) identifies the need to achieve security in new development and makes provisions to deliver this through the planning system. Deployment of equipped staff in sufficient numbers is fundamental to delivering community safety and mitigating crime.

Are the contributions directly related to the adopted and emerging allocations in Bedford Borough?

13.16 The policing demands of all the allocated sites have been identified and police mitigation of these can only be delivered by adequately equipped staff. The amounts specified are specific to the identified allocations.

Are the contributions fairly and reasonably related in scale and kind to the Borough's adopted and emerging allocations?

13.17 These are residential developments and the policing demands they will generate are known by comparison with existing local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the allocations.

Police Vehicles in Bedford Borough

13.18 As stated earlier, in managing and responding to crime a number of different vehicles can be deployed ranging from General Response Vehicles (GRVs or patrol cars), unmarked general support vehicles, public service unit vans and minibuses, scientific (e.g. Scenes of Crime Officers (SOCO)) vehicles, pursuit vehicles – 4x4 and high speed, motorcycles and so on.

- 13.19 Current fleet deployment to Bedford Borough is 67 vehicles serving 75,650 households. The average equipped cost of a vehicle is £13,350 (not including fuel and maintenance) and this is very close to the actual cost of a GRV. BP's guideline for the majority of marked vehicles is to replace every 4/5 years or 120,000 miles. The condition of vehicles at the end of their police life varies. However, BP forecast they redeem, on average, 5-10% of a vehicle's original value on disposal.
- 13.20 The average net value of the fleet in the Borough is therefore £13,350 x 67 vehicles, which gives a total of £894,450. This figure is then divided by the number of households in the Borough, to give a figure of £11.82 per household. Working out the developer contributions that would be requested from specific proposed development schemes in the Borough requires the per household figure to be multiplied by the number of new households to be created in the development concerned, before then multiplying this total by two to give 8-year life of vehicle provision.
- 13.21 This methodology to calculate requested vehicles contributions has been extensively tested and approved by the Secretary of State and Planning Inspectorate (as shown in **Appendix 3**) on numerous occasions. The sheer weight of positive decisions in favour reflects the fact there are insufficient funds for BP to take on the costs after just four years, without diverting monies from elsewhere. Ideally, BP would ask for a longer period of coverage, but it is recognised that a reasonable balance must be struck. Furthermore, BP are not seeking a contribution towards on-going costs such as fuel, servicing, repairs, fleet operations and so on. Therefore, the amount being claimed for is only part of the total cost.
- 13.22 The broader context to this is that BP are under a statutory duty to police the proposed new developments in the Borough. To do that they need to be able to access people and places using police vehicles. Without developer contributions being provided, then funds will have to be diverted from existing areas of policing to maintain a frontline service and plug the gap that has not been funded through contributions. In such circumstances it would be "robbing Peter to pay Paul", which is clearly unacceptable.
- 13.23 Therefore, the impact of the proposed developments in the Borough without the contributions would be to spread existing transport too thinly, to the extent that service delivery would be prejudiced. Residents of the new developments and their representatives will expect the same degree of cover as elsewhere in the locality and existing residents will expect existing cover to be maintained and not reduced as a result of the new allocated developments.
- 13.24 On the basis of the above information, the table below shows the vehicle infrastructure costs arising from the allocated housing sites in Bedford Borough:

Table 12: Vehicle Costs – Bedford Borough (Adopted Local Plan)

Location	No. Homes	Cost Attributable
Bedford urban area	2,647	£62,575
Urban extensions	210	£4,964
Stewartby strategic brownfield allocation	1,000	£23,640
Key service centres	2,000	£47,280
Rural service centres	260	£6,146
Total	6,117	£144,605

13.25 Turning to the ‘*Strategy Options and Draft Policies*’ consultation document published in June 2021, the vehicle infrastructure costs in relation to the four strategic options are as follows:

Table 13: Vehicle Costs – Bedford Borough (Emerging Local Plan)

Location	No. Homes	Cost Attributable
Option 2a		
- Urban area	1,500	£35,460
- Adjoining urban area	1,500	£35,460
- Rail based growth	7,500	£177,300
- South	2,000	£47,280
Total	12,500	£295,500
Option 2b		
- Urban area	1,500	£35,460
- Adjoining urban area	1,500	£35,460
- Rail based growth	5,500	£130,020
- South	1,500	£35,460
- Little Barford New Settlement; or	3,085	£72,929
- Wyboston New Settlement	2,500	£59,100
Total	12,500 or 13,085	£295,500 or £309,329

Location	No. Homes	Cost Attributable
Option 2c		
- Urban area	1,500	£35,460
- Adjoining urban area	1,500	£35,460
- Rail based growth	3,915	£92,551
- Little Barford New Settlement	3,085	£72,929
- Wyboston New Settlement	2,500	£59,100
Total	12,500	£295,500
Option 2d		
- Urban area	1,500	£35,460
- Adjoining urban area	1,500	£35,460
- Rail based growth	5,500	£130,020
- South	750	£17,730
- Little Barford New Settlement; or	3,085	£72,929
- Wyboston New Settlement	2,500	£59,100
Total	12,500 or 13,085	£295,500 or £309,329

13.26 Developer contributions towards vehicles are compliant with the statutory tests of CIL Regulation 122 as follows:

Are the contributions specified necessary to make developments in Bedford Borough acceptable in planning terms?

13.27 Vehicles are a fundamental infrastructure and facility to deliver community safety and address crime especially at neighbourhood level. This is recognised in the appeal decisions summarised in **Appendix 3**.

Are the contributions directly related to the adopted and emerging allocations in Bedford Borough?

13.28 Fleet deployment is related to the known policing demands of comparable development in the Borough. The direct additional demand from the new development has been accurately forecast. Delivering policing direct to all the new developments will not be possible without vehicles to do so. The contribution will be spent to serve all the developments and is not required to meet a funding deficit elsewhere or to service any existing development. The contributions are specific to the Borough and the developments. They would be managed and spent on this basis.

Are the contributions fairly and reasonably related in scale and kind to the Borough's adopted and emerging allocations?

13.29 These are residential developments and the policing demands they will generate are known by comparison with existing local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the allocations.

Additional Police Accommodation in Bedford Borough

13.30 BP's existing estate in the Borough was detailed in Section 11 of the BPIP. In this context, we are able to confirm that the planned growth in the area will not require any additional strategic facilities or expansion of sites outside Bedford Borough. Consequently, no contributions towards strategic police infrastructure are being requested.

13.31 The focus instead is to ensure that accommodation is provided in the Borough to enable policing services to be directly delivered to the new developments. There were several key factors considered in this respect:

- Examine the geographic locations of BP's estate in the context of planned growth;
- Whether it would be appropriate to deliver new police stations/offices in response to the development growth proposed;
- Should existing facilities be extended and/or improved to serve the planned growth; and
- The type of new police accommodation required.

13.32 Having considered the above, it has been determined that extending the Force's existing HQ is the optimum route to supporting the planned growth in the area. This is because it is large enough to accommodate a project that will deliver the additional capacity that is required. Whilst there are significant development sites being proposed in the Borough, none would be able to support the cost of an entirely new BP premises and the ancillary facilities it would require.

13.33 Calculating premises cost attributable to the Local Plan allocations is the amount of floorspace required per BP staff member (10sq.m) x number of staff generated by the allocation x build and land/lost opportunity cost (£2,695). The amount of floorspace required and the cost of delivering this per square metre has been derived from BP's own data and the Building Cost Information (BCI) database of the Royal Institution of Chartered Surveyors (RICS).

13.34 The calculated contributions shown below, using the same methodology approved by the appeal decisions detailed in **Appendix 3**, will be pooled into a single project to deliver the required additional capacity at BP’s Headquarters site. It should be borne in mind at this juncture that the CIL Amendment Regulations 2019, which came into force on 01 September 2019, abolished CIL Regulation 123 and in so doing ended the pooling restriction, or ‘five and out rule’, as it was colloquially known.

13.35 The impact of the allocated sites in the Borough, without the following contributions to deliver the specified works, will be to cause an unacceptable degree of overcrowding and inefficiencies in responses and delivering policing as a result:

Table 14: Premises Costs – Bedford Borough (Adopted Local Plan)

Location	No. Homes	No. Staff	Cost Attributable
Bedford urban area	2,647	8	£215,600
Urban extensions	210	1	£26,950
Stewartby strategic brownfield allocation	1,000	3	£80,850
Key service centres	2,000	6	£161,700
Rural service centres	260	1	£26,950
Total	6,117	20	£512,050

13.36 Turning to the ‘*Strategy Options and Draft Policies*’ consultation document published in June 2021, the vehicle infrastructure costs in relation to the four strategic options are as follows:

Table 15: Premises Costs – Bedford Borough (Emerging Local Plan)

Location	No. Homes	No. Staff	Cost Attributable
Option 2a			
- Urban area	1,500	5	£134,750
- Adjoining urban area	1,500	5	£134,750
- Rail based growth	7,500	22	£592,900
- South	2,000	6	£161,700
Total	12,500	38	£1,024,100
Option 2b			
- Urban area	1,500	5	£134,750
- Adjoining urban area	1,500	5	£134,750
- Rail based growth	5,500	16	£431,200
- South	1,500	5	£134,750
- Little Barford New Settlement; or	3,085 2,500	9 7	£242,550 £188,650
- Wyboston New Settlement	12,500 or	38 or 40	£1,024,100 or
Total	13,085		£1,078,000
Option 2c			
- Urban area	1,500	5	£134,750
- Adjoining urban area	1,500	5	£134,750
- Rail based growth	3,915	12	£323,400
- Little Barford New Settlement	3,085	9	£242,550
- Wyboston New Settlement	2,500	7	£188,650
Total	12,500	38	£1,024,100
Option 2d			
- Urban area	1,500	5	£134,750
- Adjoining urban area	1,500	5	£134,750
- Rail based growth	5,500	16	£431,200
- South	750	2	£53,900
- Little Barford New Settlement; or	3,085 2,500	9 7	£242,550 £188,650
- Wyboston New Settlement	12,500 or	38 or 40	£1,024,100 or
Total	13,085		£1,078,000

13.37 Developer contributions towards premises are compliant with the statutory tests of CIL Regulation 122 as follows:

Are the contributions specified necessary to make developments in Bedford Borough acceptable in planning terms?

13.38 Crime and community safety are planning considerations and accommodating staff in the optimum location to serve the sites is essential if this is to be achieved.

Are the contributions directly related to the adopted and emerging allocations in Bedford Borough?

13.39 The additional staffing needs the allocations will generate have been established to existing local deployment reflecting the actual policing demands and crime patterns of the Borough. In a similar vein, the premises requirement that result from the need to accommodate additional staff at the specified levels is known. A direct relationship between the allocations, additional staffing and accommodation is demonstrated and it is appropriate to mitigate this through the planning system.

Are the contributions fairly and reasonably related in scale and kind to the adopted and emerging allocations in the Borough?

13.40 These are residential allocations and the accommodation needs of staff delivering policing to meet local demands of developments of this nature is known. The contributions are based on the scale and kind of the developments envisaged by the allocations.

14 POLICE INFRASTRUCTURE REQUIRED IN CENTRAL BEDFORDSHIRE

14.1 Policing is provided by the North Bedfordshire PA, which covers Central Bedfordshire, along with Bedford Borough. The PA is led by Superintendent Jaki Whittred. As stated previously, the PA covers two Boroughs because it reflects the integrated nature of modern policing, whereby a comprehensive range of functions and teams will be called upon to deliver services to developments throughout Central Bedfordshire.

14.2 Utilising the same methodology and baseline data detailed in Section 13 of this BPIP, the additional infrastructure required by BP in Central Bedfordshire is accordingly as follows:

Equipping Police Staff in Central Bedfordshire

14.3 The costs of doing so in response to the proposed allocations is as follows:

Table 16: Staffing Numbers Required – Set-up Costs – Central Bedfordshire – Strategic Housing Allocations

Location	No. Homes	No. Staff Required	Cost Attributable
North of Luton (Town Extension)	3,600	11	£68,794
Marston Valley (New Villages)	5,000	15	£93,810
East of Arlesey (Town Extension)	2,000	6	£37,524
East of Biggleswade* (New Village)	1,500	5	£31,270
Houghton Regis North*	7,000	21	£131,334
Gross Total	19,100	58	£362,732
Net Total of Permitted Schemes	10,600	32	£200,128

*Received outline planning permission (see paragraphs 5.13 – 5.14 and 14.4 of this BPIP).

14.4 The reason for highlighting those schemes that have planning permission is that the opportunity to seek contributions from them for police infrastructure has gone; hence the net totals provided in Table 16 and the others below.

14.5 The staffing levels and associated staff set-up costs associated with the significant non-strategic housing allocations (see paragraphs 5.10 of this BPIP) in Central Bedfordshire are as follows:

Table 17: Staffing Numbers Required – Set-up Costs – Central Bedfordshire – Non-Strategic Housing Allocations

Location	No. Homes	No. Staff Required	Cost Attributable
Land East of Barton-le-Clay	498	2	£12,508
Steppingley Road	216	1	£6,254
Land West of Midland Mainline Railway	435	1	£6,254
Land West of Sundon Road	154	1	£6,254
Wixams Southern Extension	650	2	£12,508
Land East of Houghton Regis	355	1	£6,254
Northern Chamberlains Barn	175	1	£6,254
Land Rear of Station Road	244	1	£6,254
Alma Farm	159	1	£6,254
Total	2,886	11	£68,794

14.6 Seeking £268,922 for police staff set-up costs from the allocations specified in Tables 16 and 17 is compliant with the statutory tests of CIL Regulation 122. This is demonstrated as follows:

Are the contributions specified necessary to make developments in Central Bedfordshire acceptable in planning terms?

14.7 Crime and community safety are planning considerations and this is recognised by the content of the Council’s adopted and emerging development plan (see Sections 4 and 5 of this BPIP). The NPPF (2021) identifies the need to achieve security in new development and makes provisions to deliver this through the planning system. Deployment of equipped staff in sufficient numbers is fundamental to delivering community safety and mitigating crime.

Are the contributions directly related to the allocations in Central Bedfordshire?

- 14.8 The policing demands of all the allocated sites have been identified and police mitigation of these can only be delivered by adequately equipped staff. The amounts specified are specific to the identified allocations.

Are the contributions fairly and reasonably related in scale and kind to Central Bedfordshire's allocations?

- 14.9 These are residential developments and the policing demands they will generate are known by comparison with existing local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the allocations.

Police Vehicles in Central Bedfordshire

- 14.10 As stated earlier, in managing and responding to crime a number of different vehicles can be deployed ranging from General Response Vehicles (GRVs or patrol cars), unmarked general support vehicles, public service unit vans and minibuses, scientific (e.g. Scenes of Crime Officers (SOCO)) vehicles, pursuit vehicles – 4x4 and high speed, motorcycles and so on.
- 14.11 Current fleet deployment to Central Bedfordshire is 29 vehicles serving 104,399 households. The average equipped cost of a vehicle is £13,350 (not including fuel and maintenance) and this is very close to the actual cost of a GRV. BP's guideline for the majority of marked vehicles is to replace every 4/5 years or 120,000 miles. The condition of vehicles at the end of their police life varies. However, BP forecast they redeem, on average, 5-10% of a vehicle's original value on disposal.
- 14.12 The average net value of the fleet in the Borough is therefore £13,350 x 29 vehicles, which gives a total of £387,150. This figure is then divided by the number of households in the Borough, to give a figure of £3.71 per household. Utilising the same methodology explained and justified in Section 13 of this BPIP, the vehicle costs arising from the strategic and non-strategic allocated sites in Central Bedfordshire are as follows:

Table 18: Vehicle Costs – Strategic Housing Allocations – Central Bedfordshire

Location	No. Homes	Cost Attributable
North of Luton (Town Extension)	3,600	£26,712
Marston Valley (New Villages)	5,000	£37,100
East of Arlesey (Town Extension)	2,000	£14,840
East of Biggleswade* (New Village)	1,500	£11,130
Houghton Regis North*	7,000	£51,940
Gross Total	19,100	£141,722
Net Total of Permitted Schemes	10,600	£78,652

*Received outline planning permission (see paragraphs 5.13 – 5.14 and 14.4 of this BPIP).

Table 19: Vehicle Costs – Non-Strategic Housing Allocations – Central Bedfordshire

Location	No. Homes	Cost Attributable
Land East of Barton-le-Clay	498	£3,695
Steppingley Road	216	£1,603
Land West of Midland Mainline Railway	435	£3,228
Land West of Sundon Road	154	£1,143
Wixams Southern Extension	650	£4,823
Land East of Houghton Regis	355	£2,634
Northern Chamberlains Barn	175	£1,299

Location	No. Homes	Cost Attributable
Land Rear of Station Road	244	£1,811
Alma Farm	159	£1,180
Total	2,886	£21,416

14.13 Seeking £100,068 in developer contributions towards vehicles is compliant with the statutory tests of CIL Regulation 122 as follows:

Are the contributions specified necessary to make developments in Central Bedfordshire acceptable in planning terms?

14.14 Vehicles are a fundamental infrastructure and facility to deliver community safety and address crime especially at neighbourhood level. This is recognised in the appeal decisions summarised in **Appendix 3**.

Are the contributions directly related to the allocations in Central Bedfordshire?

14.15 Fleet deployment is related to the known policing demands of comparable development in the Council's area. The direct additional demand from the new development has been accurately forecast. Delivering policing direct to all the new developments will not be possible without vehicles to do so. The contribution will be spent to serve all the developments and is not required to meet a funding deficit elsewhere or to service any existing development. The contributions are specific to Central Bedfordshire and the developments. They would be managed and spent on this basis.

Are the contributions fairly and reasonably related in scale and kind to Central Bedfordshire's allocations?

14.16 These are residential developments and the policing demands they will generate are known by comparison with existing local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the allocations.

Additional Police Accommodation in Central Bedfordshire

14.17 BP's existing estate in Central Bedfordshire was detailed in Section 11 of this BPIP. However, the geographical location of a significant proportion of the development growth proposed in the Council's area means that BP's facilities in Bedford and Luton council areas will have to be expanded and used to deliver policing services. There is no choice in this respect, as to do otherwise would lead to a serious detrimental impact on response times and service delivery, which would be contrary to BP's statutory duties.

14.18 In coming to this view and to ensure policing services can continue to be directly delivered to new housing estates in Central Bedfordshire, there were several key factors considered:

- Examine the geographic locations of BP's estate in the context of planned growth;
- Whether it would be appropriate to deliver new police stations/offices in response to the development growth proposed;
- Should existing facilities be extended and/or improved to serve the planned growth; and
- The type of new police accommodation required.

14.19 Having considered the above, it has been determined that extending BP's existing premises at their Force HQ and the police stations in Dunstable, Biggleswade and Luton is the optimum route to supporting the planned growth in the area. This is because they are large enough to accommodate projects that will deliver the additional capacity that is required. Whilst there are significant development sites being proposed in Central Bedfordshire, none would be able to support the cost of an entirely new BP premises and the ancillary facilities it would require.

14.20 Calculating premises cost attributable to emerging Plan's strategic and non-strategic allocations is the amount of floorspace required per BP staff member (10sq.m) x number of staff generated by the allocation x build and land/lost opportunity cost (£2,695). The amount of floorspace required and the cost of delivering this per square metre has been derived from BP's own data and the Building Cost Information (BCI) database of the Royal Institution of Chartered Surveyors (RICS).

14.21 The calculated contributions shown below, using the same methodology approved by the appeal decisions detailed in **Appendix 3**, will be pooled into two projects to deliver the required additional capacity at the two police station sites. It should be borne in mind at this juncture that the CIL Amendment Regulations 2019, which came into force on 01 September 2019, abolished CIL Regulation 123 and in so doing ended the pooling restriction, or 'five and out rule', as it was colloquially known.

14.22 The impact of the allocated strategic sites in Central Bedfordshire, without the contributions detailed in Table 20 to deliver the specified works at the Force HQ and the Dunstable and Biggleswade Police Stations, will be to cause an unacceptable degree of overcrowding and inefficiencies in responses and delivering policing as a result:

Table 20: Premises Costs – Central Bedfordshire – Strategic Housing Allocations

Location	No. Homes	No. Staff	Cost Attributable	Police Station Project
North of Luton (Town Extension)	3,600	11	£296,450	Dunstable
Marston Valley (New Villages)	5,000	15	£404,250	Force HQ
East of Arlesey (Town Extension)	2,000	6	£161,700	Biggleswade
East of Biggleswade* (New Village)	1,500	5	£134,750	n/a
Houghton Regis North*	7,000	21	£565,950	n/a
Gross Total	19,100	58	£1,563,100	n/a
Net Total of Permitted Schemes	10,600	32	£862,400	n/a

*Received outline planning permission (see paragraphs 5.13 – 5.14 and 14.4 of this BPIP).

14.23 Table 20 demonstrates the new estate that will be required to service the planned growth in Central Bedfordshire in response to the allocated strategic sites. The expanded facilities are necessitated solely as a result as a result of the planned growth and not to accommodate any shortfall in such accommodation for the existing population. None of the accommodation proposed would be required if no growth was proposed.

14.24 The precise timing of the provision of each of the identified elements of estate infrastructure will depend to a significant extent on progress with the delivery of the strategic sites. There is an extra level of uncertainty on this at the time of writing, as the emerging Local Plan remains subject to public examination. It is the intention that future iterations of the BPIP will address this as the timescale will have become more certain.

14.25 It is the intention that the premises contributions from the strategic sites will be pooled with those that are non-strategic (where applicable). This is detailed in Table 21 below:

Table 21: Premises Costs – Central Bedfordshire – Non-Strategic Housing Allocations

Location	No. Homes	No. Staff	Cost Attributable	Police Station Project
Land East of Barton-le-Clay	498	2	£53,900	Luton
Steppingley Road	216	1	£26,950	Force HQ
Land West of Midland Mainline Railway	435	1	£26,950	Dunstable
Land West of Sundon Road	154	1	£26,950	Dunstable
Wixams Southern Extension	650	2	£53,900	Force HQ
Land East of Houghton Regis	355	1	£26,950	Dunstable
Northern Chamberlains Barn	175	1	£26,950	Dunstable
Land Rear of Station Road	244	1	£26,950	Biggleswade
Alma Farm	159	1	£26,950	Dunstable
Total	2,886	11	£296,450	n/a

14.26 Based on the information shown in Tables 20 and 21, the contributions would be pooled to provide budgets for premises expansion projects at the following BP facilities:

- Force HQ - £512,050
- Dunstable - £458,150

- Luton - £53,900
- Biggleswade - £188,650

14.27 Whilst the pooled contribution allocated to Luton above would be insufficient to deliver a capital project on its own, it is intended that this will be pooled with equivalent contributions from Luton Borough itself. Please see Section 15 of this BPIP for further details.

14.28 Additional police premises infrastructure will be required to support planned development. Without this being provide, BP will not be able to continue the current and planned levels of policing across its areas. The absence of this important infrastructure would therefore hamper BP's ability to contribute towards ensuring that planned growth in Central Bedfordshire is developed in a way that is consistent with the policies and principles of the NPPF (2021). This is underpins why seeking such contributions is in accordance with the statutory tests of CIL Regulation 122:

Are the contributions specified necessary to make developments in Central Bedfordshire acceptable in planning terms?

14.29 Crime and community safety are planning considerations and accommodating staff in the optimum location to serve the allocated sites is essential if this is to be achieved.

Are the contributions directly related to the allocations in Central Bedfordshire?

14.30 The additional staffing needs the allocations will generate have been established to existing local deployment reflecting the actual policing demands and crime patterns of the Borough. In a similar vein, the premises requirement that result from the need to accommodate additional staff at the specified levels is known. A direct relationship between the allocations, additional staffing and accommodation is demonstrated and it is appropriate to mitigate this through the planning system.

Are the contributions fairly and reasonably related in scale and kind to Central Bedfordshire's allocations?

14.31 These are residential allocations and the accommodation needs of staff delivering policing to meet local demands of developments of this nature is known. The contributions are based on the scale and kind of the developments envisaged by the allocations.

15 POLICE INFRASTRUCTURE REQUIRED IN LUTON BOROUGH

- 15.1 Policing is provided by the South Bedfordshire PA, which covers Luton Borough and LLA. The PA is led by Superintendent Jaki Whittred. This PA has the unique challenge of covering both a densely populated town and an airport (see Section 6) that is the fifth busiest in the UK. Therefore, the area warrants a PA in its own right.
- 15.2 Meeting this challenge requires significant resources from across BP, which reflects the integrated nature of modern policing, whereby a comprehensive range of functions and teams will be called upon to deliver services to the town and airport.
- 15.3 At March 2021 total floorspace occupied by BP to delivering policing to the Borough is 10,322sq.m. BP employ 1,678 staff (1,103 officers and 575 staff) to do this. The number of existing households in Luton Borough is 74,300. There are 535 police officers (Local Policing and New Recruits) delivering policing to these households.
- 15.4 The ratio of households to staff for the South PA is therefore 139:1.
- 15.5 The average cost of equipping a new staff member is £6,254. This remains the same across all three local authority areas that BP covers.
- 15.6 The additional infrastructure required by BP in Luton Borough is accordingly as follows for those schemes of 150 homes or more, as these are the ones that are particularly significant from a policing perspective. The following does not though cover BP's infrastructure requirements arising from the growth of LLA. Please see Section 6 of this BPIP in relation to this topic.

Equipping Police Staff in Luton Borough

- 15.7 The costs of doing so in response to the proposed allocations is as follows:

Table 22: Staffing Numbers Required – Set-up Costs – Luton Borough – Strategic Housing Allocations

Location	No. Homes	No. Staff Required	Cost Attributable
Napier Park*	1,205	9	£56,286
Power Court*	1,200	9	£56,286

*Received planning permission (see Table 4 and paragraph 14.4 of this BPIP).

Location	No. Homes	No. Staff Required	Cost Attributable
High Town	750	5	£31,270
Creative Quarter (including Station Gateway-Northern Gateway-Land north of St. George Square)	600	4	£25,016
Gross Total	3,755	27	£168,858
Net Total of Permitted Schemes	1,350	9	£56,286

*Received planning permission (see Table 4 and paragraph 14.4 of this BPIP).

Table 23: Staffing Numbers Required – Set-up Costs – Luton Borough – Non-Strategic Housing Allocations

Location	No. Homes	No. Staff Required	Cost Attributable
Land at Caleb Close*	224	2	£12,508
1-11 Cumberland Street*	209	2	£12,508
13-31 Dunstable Road*	214	2	£12,508
Land opposite Whitbread House, Flowers Way*	318	2	£12,508
Britannia Estate	294	2	£12,508
Land adjacent to Caddington Road & Newlands Road*	340	2	£12,508
Gross Total	1,599	12	£75,048
Net of Permitted Schemes	294	4	£25,016

*Received planning permission (see Table 5 and paragraph 14.4 of this BPIP).

15.8 In relation to the development scheme proposed by planning application 20/00147/OUT, a requirement of 7 staff is applicable, which results in a total staff set-up cost of £43,778.

15.9 Seeking an overall total of £125,080 for police staff set-up costs from the above is compliant with the statutory tests of CIL Regulation 122. This is demonstrated as follows:

Are the contributions specified necessary to make developments in Luton Borough acceptable in planning terms?

15.10 Crime and community safety are planning considerations and this is recognised by the content of the Council's Local Plan (adopted November 2017) (see Section 4 of this BPIP). The NPPF (2021) identifies the need to achieve security in new development and makes provisions to deliver this through the planning system. Deployment of equipped staff in sufficient numbers is fundamental to delivering community safety and mitigating crime.

Are the contributions directly related to the allocations in Luton Borough?

15.11 The policing demands of all the allocated sites have been identified and police mitigation of these can only be delivered by adequately equipped staff. The amounts specified are specific to the identified allocations.

Are the contributions fairly and reasonably related in scale and kind to Luton Borough's allocations?

15.12 These are residential developments and the policing demands they will generate are known by comparison with existing local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the allocations.

Police Vehicles in Luton Borough

15.13 As stated earlier, in managing and responding to crime a number of different vehicles can be deployed ranging from General Response Vehicles (GRVs or patrol cars), unmarked general support vehicles, public service unit vans and minibuses, scientific (e.g. Scenes of Crime Officers (SOCO)) vehicles, pursuit vehicles – 4x4 and high speed, motorcycles and so on.

15.14 Current fleet deployment to Luton Borough is 72 vehicles serving 74,300 households. The average equipped cost of a vehicle is £13,350 (not including fuel and maintenance) and this is very close to the actual cost of a GRV. BP's guideline for the majority of marked vehicles is to replace every 4/5 years or 120,000 miles. The condition of vehicles at the end of their police life varies. However, BP forecast they redeem, on average, 5-10% of a vehicle's original value on disposal.

15.15 The average net value of the fleet in the Borough is therefore £13,350 x 72 vehicles, which gives a total of £961,200. This figure is then divided by the number of households in the Borough, to give a figure of £12.93 per household. Utilising the same methodology explained and justified in Section 13 of this BPIP, the vehicle costs arising from the strategic and non-strategic allocated sites in Luton Borough are as follows:

Table 24: Vehicle Costs – Strategic Housing Allocations – Luton Borough

Location	No. Homes	Cost Attributable
Napier Park*	1,205	£31,161
Power Court*	1,200	£31,032
High Town	750	£19,395
Creative Quarter (including Station Gateway-Northern Gateway-Land north of St. George Square)	600	£15,516
Gross Total	3,755	£97,104
Net Total of Permitted Schemes	1,350	£34,911

*Received planning permission (see Table 4 and paragraph 14.4 of this BPIP).

Table 25: Vehicle Costs – Non-Strategic Housing Allocations – Luton Borough

Location	No. Homes	Cost Attributable
Land at Caleb Close*	224	£5,793
1-11 Cumberland Street*	209	£5,405
13-31 Dunstable Road*	214	£5,534
Land opposite Whitbread House, Flowers Way*	318	£8,224
Britannia Estate	294	£7,603

Location	No. Homes	Cost Attributable
Land adjacent to Caddington Road & Newlands Road*	340	£8,792
Gross Total	1,599	£41,351
Net of Permitted Schemes	294	£7,603

*Received planning permission (see Table 5 and paragraph 14.4 of this BPIP).

15.16 The vehicle cost attributable to planning application 20/00147/OUT is £25,860.

15.17 Seeking £68,374 overall in developer contributions towards police vehicles is compliant with the statutory tests of CIL Regulation 122 as follows:

Are the contributions specified necessary to make developments in Luton Borough acceptable in planning terms?

15.18 Vehicles are a fundamental infrastructure and facility to deliver community safety and address crime especially at neighbourhood level. This is recognised in the appeal decisions summarised in **Appendix 3**.

Are the contributions directly related to the allocations in Luton Borough?

15.19 Fleet deployment is related to the known policing demands of comparable development in the Council's area. The direct additional demand from the new development has been accurately forecast. Delivering policing direct to all the new developments will not be possible without vehicles to do so. The contribution will be spent to serve all the developments and is not required to meet a funding deficit elsewhere or to service any existing development. The contributions are specific to Luton Borough and the developments. They would be managed and spent on this basis.

Are the contributions fairly and reasonably related in scale and kind to Luton Borough's allocations?

15.20 These are residential developments and the policing demands they will generate are known by comparison with existing local residential development. That is the only satisfactory way of determining the need from development that is not yet built. Such comparables are used in identifying the impact of additional populations on most if not all public services. Demand and mitigations have been determined by the scale of the allocations.

Additional Police Accommodation in Luton Borough

15.21 BP’s existing estate in the Borough was detailed in Section 11 of this BPIP. The geographically constrained nature of the local authority’s area means that it is unnecessary to deliver entirely new BP premises in response to the development allocations. It is though necessary to expand the capacity of the existing Luton Police Station to directly deliver policing services to the new areas and communities being created. This in turn will ensure there is no serious detrimental impact on response times and service delivery, which would be contrary to BP’s statutory duties.

15.22 Calculating premises cost attributable to the Local Plan’s (adopted November 2017) strategic and non-strategic allocations is the amount of floorspace required per BP staff member (10sq.m) x number of staff generated by the allocation x build and land/lost opportunity cost (£2,695). The amount of floorspace required and the cost of delivering this per square metre has been derived from BP’s own data and the Building Cost Information (BCI) database of the Royal Institution of Chartered Surveyors (RICS).

15.23 The calculated contributions shown below, using the same methodology approved by the appeal decisions detailed in **Appendix 3**, will be pooled into a single project to deliver the required additional capacity at Luton Police Station. It should be borne in mind at this juncture that the CIL Amendment Regulations 2019, which came into force on 01 September 2019, abolished CIL Regulation 123 and in so doing ended the pooling restriction, or ‘five and out rule’, as it was colloquially known.

15.24 The impact of the allocated strategic and non-strategic sites in Luton Borough, without the contributions detailed in Tables 26, 27 and paragraph 15.25 to deliver the specified works at Luton Police Station, will be to cause an unacceptable degree of overcrowding and inefficiencies in responses and delivering policing as a result:

Table 26: Premises Costs – Luton Borough – Strategic Housing Allocations

Location	No. Homes	No. Staff	Cost Attributable
Napier Park*	1,205	9	£242,550
Power Court*	1,200	9	£242,550
High Town	750	5	£134,750

Location	No. Homes	No. Staff	Cost Attributable
Creative Quarter (including Station Gateway-Northern Gateway-Land north of St. George Square)	600	5	£134,750
Gross Total	3,755	27	£754,600
Net Total of Permitted Schemes	1,350	10	£269,500

*Received planning permission (see Table 4 and paragraph 14.4 of this BPIP).

Table 27: Premises Costs – Luton Borough – Non-Strategic Housing Allocations

Location	No. Homes	No. Staff	Cost Attributable
Land at Caleb Close*	224	2	£53,900
1-11 Cumberland Street*	209	2	£53,900
13-31 Dunstable Road*	214	2	53,900
Land opposite Whitbread House, Flowers Way*	318	3	£80,850
Britannia Estate	294	2	£53,900
Land adjacent to Caddington Road & Newlands Road*	340	3	£80,850
Gross Total	1,599	14	£377,300
Net of Permitted Schemes	n/a	2	£53,900

*Received planning permission (see Table 5 and paragraph 14.4 of this BPIP).

15.25 Premises cost attributable to planning application 20/00147/OUT is £188,650.

15.26 Developer contributions totalling £565,950 for expanding the capacity of Luton Police Station are compliant with the statutory tests of CIL Regulation 122 as follows:

Are the contributions specified necessary to make developments in Luton Borough acceptable in planning terms?

15.27 Crime and community safety are planning considerations and accommodating staff in the optimum location to serve the allocated sites is essential if this is to be achieved.

Are the contributions directly related to the allocations in Luton Borough?

15.28 The additional staffing needs the allocations will generate have been established to existing local deployment reflecting the actual policing demands and crime patterns of the Borough. In a similar vein, the premises requirement that result from the need to accommodate additional staff at the specified levels is known. A direct relationship between the allocations, additional staffing and accommodation is demonstrated and it is appropriate to mitigate this through the planning system.

Are the contributions fairly and reasonably related in scale and kind to the Borough's allocations?

15.29 These are residential allocations and the accommodation needs of staff delivering policing to meet local demands of developments of this nature is known. The contributions are based on the scale and kind of the developments envisaged by the allocations.

16 CONCLUSIONS

- 16.1 Development growth in Bedfordshire must in future fully account for its impact upon BP's services and provide mitigation for negative impacts upon its infrastructures where necessary.
- 16.2 Whilst BP have hitherto absorbed the impacts arising from new development in its Force area since 06 April 2015 without seeking mitigation from the town planning system, this cannot be continued, as the capacity to do so within its existing infrastructures has been exhausted. This has been explained extensively in this BPIP.
- 16.3 Furthermore, as was explained in Section 9 of this BPIP, BP does not have its own resources to address this, which is a position in common with other public service providers. Nor will the Council Tax precept meet the costs of BP's infrastructure needs arising from development growth. Not only is this funding significantly insufficient anyway compared to the costs that arise, but it would not be legal, fair or reasonable to raise the precept to the levels required to close the funding gap. In any case, precept funding from residents of new development is too late and too little to address infrastructure delivery. This would not be considered an acceptable situation for the funding of new highways or schools, so why should it be so for the police or other emergency services?
- 16.4 Plainly, the infrastructure costs identified in this BPIP relate to one-off costs that BP would have to cover that are directly and fairly related to the need arising from the new homes proposed across Bedfordshire and that would otherwise have to be covered by BP.
- 16.5 Considering this context, it is also important to understand that 'infrastructure' does not just mean capital projects. There are no exclusions within the statutory framework or policy guidance relating to infrastructure, or indeed in guidance, that exclude other types of infrastructure such as vehicles, equipment or initial training for police officers. This is confirmed by Section 3 of this BPIP and the 36 appeal decisions detailed in **Appendix 3**. If it were just capital projects, it would also pose a significant constraint on local planning authorities as for example travel packs, public open space management companies and monitoring contributions are all frequently included within Section 106 agreements, but are not tangible or built infrastructure. They are contributions towards the provision of services.
- 16.6 Section 106 is the most appropriate mechanism for delivering police infrastructure, not least because there is no CIL operating in Central Bedfordshire or Luton Borough. Whilst there is one in Bedford Borough, the amounts collected are already allocated for Parish or Borough Council projects. Both situations with CIL in Bedfordshire (and other reasons beside) are mirrored nationally and explain why the Government abolished CIL Regulation 123, or the 'five and out rule' as of 01 September 2019. It also meant that Section 106 and CIL can be used to fund the same piece of infrastructure. Therefore, the issues of pooling or 'double dipping' do not arise in any form in relation to the police or other types of infrastructure for that matter.

- 16.7 Notwithstanding the above, it is emphasised that BP do not actually need to pool contributions in order to spend these to secure individual development specific additions to its infrastructures. Nor are the amounts specified in this BPIP tariff based, as each one is specific to each site and development thereon. BP would manage and spend all contributions on this basis.
- 16.8 This BPIP has therefore followed the proportionate approach advocated by the NPPF (2021) through utilising a methodology endorsed by the NPCC that has been judged to be sound on 12 occasions by the Secretary of State and on 31 occasions by the Planning Inspectorate (see **Appendix 3**). This confirms that this is the only way of assessing and identifying the impact of additional households in new developments on policing. Whilst the demand for policing changes over times and this in turn can be reflected in BP's deployment, a view has to be taken at the time of writing the BPIP through using up-to-date information, as this the only sensible way to demonstrate policing impact and again this is what the NPPF (2021) supports. In addition, and as stated previously, this BPIP will be updated on an annual basis.
- 16.9 Sections 4 and 5 of this BPIP evidence the fact that community safety, crime and the mitigation of this are planning considerations. Therefore, developments that do not consider these are unacceptable on sustainability grounds if they are delivered without any provision for police infrastructure. This was perhaps best expressed in the Secretary of State decision detailed in paragraphs 3.9 – 3.10 of this BPIP. Whilst admittedly uncertainty remains as to the precise extent of direct development plan policy support for police contributions in the three local authority areas of Bedfordshire, it is unnecessary for a contribution to be properly sought and made that there be specific development plan policy in place for the contribution in question. This is confirmed by the appeal decisions detailed in paragraph 4.32 of this BPIP.
- 16.10 Ultimately, BP are under a statutory duty to police every area of Bedfordshire no matter how many or few people there are. To do that, infrastructure must be place in enable delivery to happen, which requires developer obligations to enable this. The only alternative is to divert funds away from existing areas of policing and plug the gap as far as possible that has not been funded through contributions. This type of situation is robbing Peter to pay Paul, which clearly benefits no one.
- 16.11 Therefore, the infrastructure contributions detailed in Sections 13-15 of this BPIP and summarised in the tables below are necessary, directly related to all the proposed developments in Bedfordshire and reasonably related in scale and kind:

Table 28: Bedford Borough – Summary of Total Additional Infrastructure Costs (Adopted Local Plan)

Infrastructure Type	Cost	BPIP References
Recruitment and equipping of staff	£118,826	Table 10
Police vehicles	£144,605	Table 12
Police premises	£512,050	Table 14
Total	£775,481	n/a

Table 29: Bedford Borough – Summary of Total Additional Infrastructure Costs (Emerging Local Plan)

Infrastructure Type	Cost	BPIP References
Recruitment and equipping of staff	£237,652 or £250,160	Table 11
Police vehicles	£295,500 or £309,329	Table 13
Police premises	£1,024,100 or £1,078,000	Table 15
Total	£1,557,252 or £1,637,489	n/a

Table 30: Central Bedfordshire – Summary of Total Additional Infrastructure Costs

Infrastructure Type	Cost	BPIP References
Recruitment and equipping of staff	£268,922	Tables 16 and 17
Police vehicles	£100,068	Tables 18 and 19
Police premises	£1,158,850	Tables 20 and 21
Total	£1,527,840	n/a

Table 31: Luton Borough – Summary of Total Additional Infrastructure Costs

Infrastructure Type	Cost	BPIP References
Recruitment and equipping of staff	£125,080	Tables 22, 23 and Para 13.8
Police vehicles	£68,374	Tables 24, 25 and Para 13.16
Police premises	£512,050	Tables 26, 27 and Para 13.25
Total	£705,504	n/a

16.12 Tables 28 – 31 confirm that the total infrastructure cost to BP arising as a direct result of proposed development growth from confirmed allocations in Bedfordshire is £3,008,825. This could rise to £4,646,314 if the emerging allocations from Bedford Borough are included as well. These figures do not though include the impacts that will arise from the proposed development of the airport (see Section 6 of this BPIP). This will be accounted for when future iterations of the BPIP are prepared.

16.13 The figures accordingly represents the infrastructure that will be required by BP to continue the current and planned levels of policing across its area. It is therefore an essential cornerstone of modern sustainable communities as recognised by the High Court, Secretary of State and numerous Planning Inspectors.

16.14 Whilst the total figures presented here may appear large when viewed in isolation, they are modest compared to the huge funding requirements associated with delivering highways, health care and school infrastructure for example. That does not though detract from their significance for ensuring the continuation of policing services and for the communities who will rely upon them every day.

16.15 The comprehensive information and evidence presented here is though intended to be only the first step of BP’s engagement with the planning system in the long-term. It is only by means of positive and constructive partnership work between BP and the three Councils that truly sustainable development growth in Bedfordshire will be realised. This in turn will underpin the delivery of the Government’s vision of places in England that are safe and accessible where crime and disorder, and the fear of crime, does not undermine quality of life or community cohesion.

APPENDIX 1

High Court Judgement – 22 November 2016

APPENDIX 2

High Court Judgement – 27 May 2014

APPENDIX 3

Summary of Appeal Decisions

APPENDIX 4

The East West Rail Route

APPENDIX 5

Bedfordshire Police – The 195 Beat Areas

APPENDIX 6

Bedfordshire Police – Existing Estate