Oadby and Wigston Town Centres Action Plan.

Submissions by Michael Lambert on behalf of Leicestershire Police.

This submission provides the following.

1) A statement from the Local Policing Unit about the impact of the evening economy on Police resourcing in the town centres. This is submitted for the Inspectors and Examination's consideration of the matter and to substantiate Police concern to ensure that the capacity of our infrastructures is considered alongside growth proposals in the AAP.

2) A statement in relation to AAP content, its status and likely interpretation. We make the case that omission of Policing Infrastructure undermines the Plan and will put us in an inferior position as regards securing funding for necessary additions to our infrastructures. The Council are invited to agree AAP content as Common Ground.

3) A statement in relation to NPPF content in the round and specifically about Plan making. We make the case that on a number of counts the AAP as current does not comply with NPPF in our view. Having said this the changes we believe are necessary are minor and can only add to the status of the Plan and its prospects for delivery and success. The Council are invited to agree AAP content as Common Ground.

4) Suggested wording to achieve NPPF compliance, strengthen the AAP, include Policing infrastructures and capture the commitment of both Authorities to monitor town centre crime levels as planned development takes place.

5) Conclusion

Apendices.
Town Centre crime maps.
Police Infrastructure Plan for Oadby and Wigston.
1] Statement by LPU on the impact of the evening economy on Local Policing.

Oadby & Wigston Town Centres are prominent places for the local, and non local communities to socialise in. This is mainly because of their ease of access with good bus and train routes, and sufficient parking, and high number of pubs and restaurants. Day to day this has little impact on how we do business at Oadby & Wigston LPU however there is a distinct impact on Policing at key times. This is largely due to the availability of alcohol, the number of pubs, clubs, off licences and supermarkets. The pubs and clubs are not overly busy during the working week and the good majority rely upon the night time economy, particularly Friday & Saturday evenings.

We also have large supermarkets interjected in & around the town centres – and most have large ranges of alcoholic drinks often at very low prices on offer. There are also busy off licences within each of the town centres which add to the availability of alcohol and its ease of purchase.

Eg. Tesco at South Wigston (24 hours), Sainsburys, Aldi, Co-Op at Wigston; ASDA (24 hours), Sainsburys, Waitrose in Oadby.

To add to the extended socialising of a night time, there are a plethora fast food outlets / take-aways, again all within the town centres.

Consequently in general this has an impact on our policing at these key times. The impact requires a need for an increase of Police Officers & PCSO’s on Friday & Saturday nights, and often on Saturday & Sunday mornings to deal with the aftermath. Hand in hand with this is an increased demand on Police vehicles, Airwave usage (impacting on other LPU’s as we often share the talkgroups), CMC operator staff and custody suites.

For example during weekdays the average number of calls made to the Police to deal with Oadby & Wigston Incidents are as follows:

- Monday to Thursday: on average there are between 25 – 29 calls per day.
- Friday & Saturdays: on average 32 – 35 calls per day.
  (based upon a 2 month period in 2012)

Number of crimes reported in 2011: 6752
Offences reported on Sundays to Thursdays 4535
Friday & Saturdays 2217
18% more crimes are reported on weekend days.

Comments of Police Architectural Liaison Officer

I believe this demonstrates the additional call on Policing resources that evening economy uses generate locally. Indeed this impact is also evident in relation to weekend activity which is at least in part related to use of the town centres at these times. Police are not opposed to LPA and community aspirations to increase these activities and note the contents of the AAP which is intended to do so. The plan should however recognise that successful evening economies depend on this important presence to manage these centres at certain times. In general Police are able to organise and resource man power attendance but we do face particular problems keeping our capital infrastructures in step with growth proposed in Plans eg officer equipment, control centre, airwaves system, PND system, local access points, vehicles and premises. This is the subject of the following submissions
however I believe this local perspective on a particular outcome of the AAP is related to this. I provide attached Local crime maps illustrating the concentration of incidents in the two town centres, as opposed to areas that surround them. In the last year.

2] The Purpose of the AAP, its Delivery Strategy for Infrastructure and impact upon Policing Infrastructure.

"The AAP is a major part of the statutory planning basis for the determination of development proposals within Wigston and Oadby. It includes Planning Policies to guide and inform development proposals and decisions". [P7]

"The AAP is supported by a separate Delivery Strategy which…. gives detailed strategy and delivery routes for the implementation….including infrastructure requirements detailed in the appendix." [P8]

"A delivery strategy is set out…together with an assessment of key actions likely to be needed in order to implement the proposals as set out" [P87] "Delivery Strategy for Infrastructure" follows and there is no mention of Policing infrastructures within this however there are items relating to the extension of Primary and Secondary Schools in both Town centres and a Health Centre in Wigston. In relation to the latter the Inspector queries location and commitment to this. Policy 14 of the AAP says the proposed development may include Health provision.

"Infrastructure requirements is essential infrastructure required to support the growth of the Borough[ road, schools, health centre, parks, community centre, cemetery etc]" [P103]

"Local Infrastructure Plan means the Borough Councils Plan that sets out what infrastructure requirements relate to key developments in the Borough as set out in the Core Strategy and this Area Action Plan" [P 104]

"The Borough Councils Local Infrastructure Plan clarifies expectations from the key developments within the centres and this is set out in appendix D" [P 28]

Comments of Police Architectural Liaison Officer
The Borough Council are invited to agree the preceding as common ground particularly as these are extracts form the AAP itself. I submit that any reader of the AAP, and particularly town centre developers, would not anticipate any requirements as far as Policing infrastructures to accompany development proposals of the Plan are concerned. On the other hand there can be no doubt about the need for contributions as far as other essential public sector infrastructures are concerned. This AAP content is intended to provide a comprehensive guide to new development in these localities and the inclusion of public infrastructures re-enforces this. Whist there is reference to the Core Strategy and the Council in response to our concerns suggest that contributions will be dealt with via other means, the AAP purports to stand as Policy guidance in its own right and I submit that it will be read as such. Indeed if anything by its own content it is suggesting what public infrastructures will be required to serve the town centres and by its omission what aren’t. Policing facilities, like other infrastructures, need to keep pace with new development the Borough Council is proposing and there appears to be no reason why these are excluded from the AAP and should remain so.

3] NPPF
"Local Plans should include strategic policies to deliver…the provision of health, security, community… infrastructure and other local facilities" [Para 156]

"Planning Policies and decisions should deliver social, recreational… facilities and services the community needs" [Para 70]

"Planned infrastructure should be deliverable…..infrastructure and development policies should be planned at the same… local standards should be assessed at plan making stage" [Para 177].
Through a number of paragraphs from 157 to 177 in NPPF four primary tests emerge.
- Plans should be positively prepared including infrastructure and achieving sustainable development.
- There should be an evidenced and reasoned argument to justify the Plan.
- There should be effective delivery arrangements.
- Plans should comply with NPPF in all other respects.

**Comments of Police Architectural Liaison Officer**
The Borough Council are invited to agree the preceding as common ground particularly as these are extracts from the NPPF itself. There are a number of NPPF contents outside its specific guidance about Plan making which in my view highlight shortcomings in the AAP as far as its content in relation to Policing is concerned. The plan does not comply with these other NPPF policies in our view.

Post Examination readers of the AAP will assume it is compliant with NPPF. This places a burden on the Inspector and the Examination particularly because of the difficulties I have already outlined. Omissions in the Strategy for Infrastructure in the AAP already compromise its soundness in our view. Further in relation to the four tests Policing infrastructure, to ensure that proposed development is sustainable, simply does not appear and this is particularly worrying as we have taken the trouble to comment on this and suggest what, in our view, are un controversial minor additions. We have also taken the trouble to prepare our Infrastructure Plan for the Borough and sent this some while ago and certainly in time for the Council to consider pre Examination changes to the AAP and we have invited these. I attach our Infrastructure Plan for the Inspectors information.

It seems to me that this, as well as what we say in relation to Local Policing above, and the comments we made on the action Plan when we saw it, provide more than sufficient evidence for Police inclusion in the Strategy for Infrastructure. Indeed I would go as far as to ask whether other infrastructure providers had to make such an effort to justify what is included? In any case we know this may now be subject to change at this stage as far as health is concerned and it is reasonable to assume that such change should extend to the addition of Police infrastructures.

In respect of delivery arrangements we haven’t had the opportunity of outlining how our important infrastructures are maintained and the difficulties we have with revenue funding of these. Nevertheless in relation to our Infrastructure Plan we are committed to procure what we know will be necessary for Policing to keep pace with growth proposed in Oadby and Wigston and to this extent would be able to support the delivery arrangements of the AAP.

**4] Suggested Minor changes to overcome Police objections and make the Plan sound.**

In relation to the evening economy, activity on which the success of the Plan will in part depend, we invite the Inspector and LPA to make minor additions to Plan content to reflect the role and contribution of the Police to the management of this. These should highlight the need to maintain our support infrastructures on which we depend to provide this role. This content might be in the Key Issues and Challenges, Visions and Objectives or indeed the justification of implementation Policies 13 and 17 for each town.

**In relation to our infrastructures and the Delivery Strategy for Infrastructure for Wigston**

We suggest an insert row after extensions to schools with column content
- Infrastructure requirement - expansion of Police facilities/infrastructures to accommodate growth
- Site ID - none
- Opportunity sites and contribute - Burgess Junction, Paddock Street, Chapel Mill and Direction for Growth.
- Funding and Delivery Partners - Developer, OWBC and Leicestershire Police
- Indicative timescale- phase 2/3
- Delivery cost- £242 K
- Implementation Mech. - to ensure sufficient and suitable provision for growth in Policing infrastructure needs as a result of new development.
- Risk - Limited
- Flexibility - Delivery as part of the overall strategy for Wigston and therefore timing flexibly based upon delivery of schemes.
In relation to our infrastructures and the Delivery Strategy for Infrastructure for Oadby we suggest an insert row after extensions to schools with column content -
- Infrastructure requirement - expansion of Police facilities/infrastructures to accommodate growth
- Site ID - none
- Opportunity sites and contribute - Brooksby and Baxter Place.
- Funding and Delivery Partners - Developer, OWBC and Leicestershire Police
- Indicative timescale- phase 2/3
- Delivery cost- £36 K
- Implementation Mech - to ensure sufficient and suitable provision for growth in Policing infrastructure needs as a result of new development.
- Risk - Limited
- Flexibility - Delivery as part of the overall strategy for Oadby and therefore timing flexibly based upon delivery of schemes.

In relation to the Police enthusiasm to secure a shopfront presence in the centre of Oadby town centre we suggest an insert row in the Delivery Strategy for Infrastructure in Oadby after the above with column content -
- Infrastructure requirement - shopfront drop in facility in central shopping area.
- Site ID - none
- Opportunity sites and contribute - Brooksby and Baxter Place.
- Funding and Delivery Partners - Developer, OWBC and Leicestershire Police
- Indicative timescale- phase 1/2/3
- Delivery cost- £4K, premises to be provided rent free by partner.
- Implementation Mech - to ensure sufficient and suitable provision to support town centre expansion and safety and security therein.
- Risk - Limited
- Flexibility - Delivery as part of the overall strategy for Oadby and therefore timing flexible based upon delivery of schemes.

In relation to the capture of crime data in AAP monitoring we suggest an additional paragraph again in either Key Issues and Challenges, Visions and Objectives or indeed the justification of implementation Policies 13 and 17 for each town which might read -
Public safety and security is of concern in regenerating these town centres and it is important that new development contributes to reducing crime and the fear of crime if they are to be successful. The Borough Council and its partners already monitor local incidents of crime and antisocial behaviour through the Crime Reduction Partnership. Developers will be expected to review local crime patterns in the locality of their schemes, include proposals to improve security in the public realm and review the effectiveness of their proposals after the development is completed.

5) Conclusion

Leicestershire Police look to the LPA to accommodate the minor additions we propose and we appreciate their sympathy to the last of these. By far the most important in our view is in relation to the Delivery Strategy for Infrastructure where we argue that additions can only strengthen the Plan. As we have said on many occasions we are happy to consider alternative wording however we are of the view that the Plan should not be adopted without the changes we suggest to the Delivery Strategy for Infrastructure. We look to the Inspector to support our approach and if warranted require these changes to be made in his report on the Plan.