

**From:** Stephen Day (7815) <Stephen.Day@leics.police.uk>  
**Sent:** 04 September 2024 13:30  
**To:** localplans@charnwood.gov.uk  
**Subject:** RE: FAO Richard Bennett: Charnwood Local Plan Examination Main Modification Consultation  
**Attachments:** Local Plan Charnwood Borough Council 2021-2037 04.09.24 .pdf

You don't often get email from stephen.day@leics.police.uk. [Learn why this is important](#)

Hi Richard,

Attached is my report in respect to the Local Plan for Charnwood Borough Council 2021-2037.

Kind Regards

Steve

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**From:** localplans@charnwood.gov.uk <localplans@charnwood.gov.uk>  
**Sent:** Wednesday, July 17, 2024 12:45 PM  
**Subject:** Charnwood Local Plan Examination Main Modification Consultation

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Dear Sir/Madam

## **Charnwood Local Plan Examination Main Modification Consultation**

The Pre-Submission Charnwood Local Plan 2021 – 2037 was submitted to the Secretary of State in December 2021 for Examination in Public pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. Examination Hearing Sessions were held in June 2022, October 2022, February 2023 and February 2024.

The Inspectors undertaking the Examination, Sarah Housden BA (Hons) MRTPI and Hayden Baugh-Jones BA(Hons) DipLA MA CMLI, have identified where changes (main modifications) are necessary to make the Local Plan sound and legally compliant. These are included in the Schedule of Proposed Main Modifications which will be published for a seven-week period of consultation commencing on **Wednesday 17th July and ending at 5pm on Wednesday 4th September**. There are three elements to the consultation, and these are explained in more detail below:

### ***1. Schedule of Proposed Main Modifications***

The consultation invites comments on the following main modification documents:

- EXAM 81: Schedule of Proposed Main Modifications
- EXAM 82: Schedule of Proposed Main Modifications to Local Plan Diagrams
- EXAM 83: Sustainability Appraisal of Main Modifications to the Local Plan.

### ***2. Updated Housing Land Supply Position***

The Council has updated its housing land supply position to the end of March 2024 and has produced a number of documents to support this position as part of the Proposed Main Modifications to the plan. The Council is inviting representations on the following documents:

- EXAM 58J: Housing Trajectory Update 2024
- EXAM 58K: Housing Trajectory Update Notes May 2024
- EXAM 58L: Update to Five Year Supply on Adoption May 2024
- EXAM 58M: Updated Housing Land Supply Site List April 2024.

### **3. Schedule of Proposed Changes to Policies Map 1 and 2**

The Policies Maps do not form part of the development plan itself therefore the Council is proposing a number of changes to them rather than main modifications. This is to ensure that they are factually correct and provide an accurate representation of the Local Plan policies. The Council is inviting comments on the following document:

- EXAM 84: Schedule of Proposed Changes to Policies Maps 1 and 2.

#### How to view the documents

The documents described in sections 1, 2 and 3 above are available for inspection at the following locations:

Charnwood Borough Council's Examination webpage at:

[Charnwood Local Plan 2021-37 Examination - Charnwood Borough Council](#)

and

Charnwood Borough Council Offices, Southfield Road, Loughborough, Leicestershire LE11 2TN  
- open Monday to Thursday 8.30am – 5pm and Friday 8.30am - 4.30pm.

#### How to comment on the documents

We recommend that you use the relevant part of the Representation Form when responding to section 1 Schedule of Proposed Modifications and 2 Updated Housing Land Supply Position and the Comment Form for responding to section 3 Schedule of Proposed Changes to Policies Maps 1 and 2. The Representations Form and Comments Form can be found on the Council's Examination webpage at:

[https://www.charnwood.gov.uk/pages/main\\_modifications](https://www.charnwood.gov.uk/pages/main_modifications)

Comments can also be emailed to [localplans@charnwood.gov.uk](mailto:localplans@charnwood.gov.uk)

Or made in writing to: Local Plans Team, Charnwood Borough Council, Southfield Road, Loughborough, Leicestershire LE11 2TN.

Please note that representations must be received by **5pm on Wednesday 4th September**.

Comments should only be made in relation to the documents outlined in sections 1, 2 and 3 above. This consultation is not an opportunity to repeat or raise further representations about the Local Plan or to seek further changes to it. We have prepared a Guidance Note which provides further detail on how to make comments.

All representations received will be taken into consideration by the Inspectors when preparing their report to Charnwood Borough Council.

Yours faithfully



Richard Bennett  
Head of Planning and Growth

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Date: 04/09/24

Your ref: Charnwood Borough Council: Local Plan: Our Ref: SD

Contact Mr Stephen Day-Designing out Crime Officer

Email: [Stephen.day@leics.police.uk](mailto:Stephen.day@leics.police.uk)

Mobile No: 07966 286073

Dear Richard,

I am writing to you in my capacity as the Leicestershire Police Designing out Crime Officer (DOCO). I have been requested to comment on behalf of Leicestershire Police in relation to the proposed Local Plan as proposed by Charnwood Borough Council Local Plan covering the period 2021-2037.

Leicestershire Police support the creation of safe environments which is a primary goal of any new development. Paragraph 91(b) of NPPF 2024 specifically provides that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: ...

**96.** Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:

(a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.

(b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas; and

(c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

**100.** To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan **101.** Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:



(a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate <sup>45</sup>. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and

(b) recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

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(b) recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.



Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis and is wholly dependent on a range of facilities for staff to deliver this. A primary issue for Leicestershire Police is to ensure that new large-scale developments make adequate provision for the future policing needs that it will generate.

At present Charnwood Borough Council has Policing facilities where much of the policing activity for the Town is based. However, where additional development is proposed Leicestershire Police may seek to deploy additional staffing and additional infrastructures to ensure quality community-based policing. It would be complacent not to do this because without additional support unacceptable pressure will be put on existing staff and our capital infrastructures which will seriously undermine their ability to meet the policing needs of the development and maintain the current level of policing.

Therefore, Charnwood Borough Council are requested to work with Leicestershire Police by consulting with them on large-scale applications, firstly to gain their perspective from a design front and secondly to understand whether the associated growth would produce a need for additional policing infrastructure. If this is the case then Leicestershire Police will assess each application on an individual basis, by looking at the current level and location of available officers and then the demand associated with that development.

A request for developer contributions may then be submitted to go towards the additional infrastructure needed to maintain a sustainably high level of policing within the areas covered by Charnwood Borough Council.

#### For Your Information

Policing aspirations for the Charnwood Borough Council areas continue to be to provide a high-quality service including continued investment in existing estate and resources. Also included will be aspirations to maintain our efforts to protect the public in high foot fall public areas or areas where higher risk is considered. Section 17 of the Crime and Disorder Act 1998 states all relevant authorities have a duty to consider the impact of all their functions and decisions on crime and disorder. Leicestershire Police will work closely with our partners to design out these risks wherever possible.

Areas including public space, shop frontages and appropriate security such as shutters should include sympathetic design and be in keeping with local architecture, whilst still providing effective security. Other key areas where planning can support the local businesses includes the night time economy. Effective planning including lighting and use of CCTV if required will reduce the risk of crime and disorder.

In support of managing these requirements providing a 24/7 service, Leicestershire Police will continue to review our existing estate. Leicestershire Police would be keen to work in partnership with Charnwood Borough Council to identify enhanced potential Police estate



including staff parking. This would allow Leicestershire Police to be appropriately resourced during this period of proposed expansion of population and associated activity.

#### S106 Agreements and CIL (Community Infrastructure Levy)

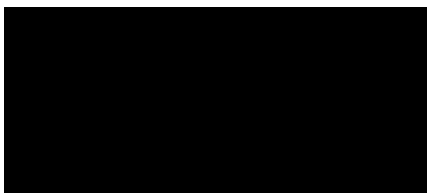
Currently Charnwood Borough Council have several S106 Agreements in respect to new developments within the Charnwood Borough Council area in support of Policing. Also, no CIL funding is provided towards Policing resulting in only statutory funding via the Policing precept and Government and S106 obligations. Where new demand is placed on Policing resources due to expansion Leicestershire Police, Charnwood Borough Council and people within the area of Charnwood Borough Council would benefit from support of the provision of S106/CIL and future S106 bids will be considered in support of Policing provision within the Charnwood Borough Council area.

#### Consultations on Planning Applications

Current planning consultations referred to Leicestershire Police have provided the opportunity to comment on several applications. It would be beneficial if further comment continued to be referred in respect to large developments either residential or commercial. Also, where there is an increased risk of public safety via open space and large footfall as well as areas relating to changes to the night economy would be appreciated (Section 17 of Crime & Disorder Act 1998). Traveller provision is another area where Policing considerations are recommended wherever possible for comment.

Should you require any further information please do not hesitate to contact me.

Kind Regards



Mr Stephen Day,  
Designing out Crime Officer,  
Leicestershire Police.