

Core Strategy Review - Inspectors' Action Points

**Matter 7a – Strategy for the North Downs Area
and the New Garden Settlement - Infrastructure
Requirements of Blue Light Services**

18 May 2021

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Matter 7a – Infrastructure Requirements of Blue Light Services

1. Introduction

- 1.1. During the hearing session for Matter 7a, New Garden Settlement, the council was asked what consideration there has been to understand and define the infrastructure and service requirements of Blue Light Service providers arising from the planned growth at the new garden settlement.
- 1.2. For the purpose of clarity, the ‘Blue Light Services’ comprises the following:
 - Kent Police;
 - Kent Fire and Rescue Service; and
 - South East Coast Ambulance Service NHS Foundation Trust.

Previous engagement

- 1.3. The council previously engaged with the Blue Light Service providers to inform the preparation of Infrastructure Delivery Plans (dating back to 2017) prepared as part of the evidence base documents to support the Places and Policies Local Plan and Core Strategy Review respectively.
- 1.4. Contact details for the service representatives were shared with the promoters of the garden settlement in October 2017 for meetings to be arranged to discuss how the requirements of the blue light services could be taken into account in the evolution of the Framework Masterplan and the development of planning policy.

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Current requirements

- 1.5. The council has engaged with representatives from each of the Blue Light Services to understand their current requirements, and copies of correspondence received are appended to this statement. Summaries of the responses received are set out in Section 2 of this statement.
- 1.6. The council has sought to understand how the development proposed for the Core Strategy Review plan period may generate a requirement for additional land, buildings and/or developer contributions.
- 1.7. Kent Police is currently reviewing its operations to establish how best to provide accommodation in the Folkestone & Hythe district, while Kent Fire and Rescue Service and the South East Coast Ambulance Service do not specifically identify a need for additional sites. However, all the services highlight the need for proportionate contributions from new developments to their service provision, for additional staff, equipment or the expansion or reconfiguration of existing facilities.
- 1.8. The council considers that this can best be addressed through continuing discussions on the Section 106 agreement as part of the Outline Planning Application, rather than through introducing specific wording in Policies SS6-SS9. Core Strategy Review Policy SS5: District Infrastructure Planning requires that development should provide, contribute to or otherwise address the district’s current and future infrastructure needs. Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed.

2. Responses Received from Blue Light Services

Kent Police

- 2.1 The size, expected population and location of the development is such that Kent Police would require a secure building for staff working, equipment, IT and parking as ‘accommodation’, for the necessary additional personnel. There will be a need for additional custody facilities and for initial start-up costs and equipment for new personnel.
- 2.2 Kent Police has requested that funding (in the form of capitalising the associated revenue costs) for staff for the first three years following first occupation will also be required - on the basis there is a time lag between new population growth and receipt of increased payments.

Kent Fire and Rescue Service

- 2.3 Kent Fire and Rescue Service has advised that it is currently reviewing its frontline emergency response provision and, as yet, has not identified any locational changes for its fire stations in the Folkestone and Hythe area. The service does take into account new developments and infrastructure and is aware of the proposed new garden settlement which, after an initial evaluation, did not present any opportunities to improve its response in the area.

South East Coast Ambulance Service NHS Foundation Trust

- 2.4 The South East Coast Ambulance Service (SECAmb) provides ambulance services to the area.
- 2.5 Folkestone and Hythe falls under the area served by the existing Ashford ‘Make Ready Centre’ (MRC). The new garden settlement proposal is unlikely of itself to require an additional MRC, though this and other new settlements across the South East will put pressure on existing MRC capacity, meaning that further strategically located MRCs may well be required in the future.

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- 2.6 In the medium-term the existing Hastings MRC, which is relatively small being a conversion from a former ambulance station, is likely to need to be replaced with a larger facility. This is likely to need further expansion as a result of the new garden settlement.
- 2.7 The creation of the new garden settlement will generate increased demand on SECAMB, with the likely need for additional strategically located Ambulance Community Response Posts (ACRPs) as well as the enhanced MRC capacity.
- 2.8 Advisors to the service provider (through Lakers Chartered Surveyors) have enquired if there would be scope for Section 106 or Community Infrastructure Levy (CIL) funding to support the enlargement of MRC capacity and the additional ACRPs.
- 2.9 The council has sought further clarification on the likely requirement beyond the end of the plan period, encompassing the full build-out of the garden settlement. Lakers and SECAMB have stated (by email 18 May 2021) that any additional homes delivered after 2036/37 would have a pro-rata impact on the ambulance service; the service would therefore seek additional developer contributions to support the provision of the enlarged MRC capacity and additional ACRPs.
- 2.10 The council will maintain dialogue with the provider in order to define their specific requirements.

Conclusions

- 2.11 The council considers that the Section 106 mechanism is the appropriate means to secure the infrastructure requirements of the Blue Light Service providers.
- 2.12 Accordingly, it is not anticipated that modifications will be required to policy criteria in the Core Strategy Review in order to safeguard the infrastructure requirements specified by the Blue Light Service providers.

3. Securing Infrastructure Provision for Blue Light Services

- 3.1 Provision for Blue Light Services forms part of the continuing Section 106 discussions in relation to the Outline Planning Application and has been included as a topic in these discussions.
- 3.2 The precise requirements will be assessed and agreed in the context of Regulation 122 of the Community Infrastructure Levy Regulations and the tests of the National Planning Policy Framework.
- 3.3 This will include the following:
- **Kent Police** - consideration being given to providing an on-site presence for the police, such as an office base within the town centre or close to associated community services, subject to satisfactory demonstration of need. Any such provision will be secured through planning obligations and future submissions, such as through the Tier 2 Delivery Plan¹;
 - **Kent Fire and Rescue Service** - while the Fire and Rescue Service has advised that the new garden settlement does not present any opportunities to improve their response in the area, the council will nevertheless maintain close cooperation with the service as the detail of the development advances; and
 - **South East Coast Ambulance Service** - the council will maintain dialogue with representatives of the South East Coast Ambulance Service in order to define the specific requirements arising from the new garden settlement, in the context of a service that has a relatively broad geographical coverage.

¹ See New Garden Settlement in the North Downs Area, Joint Delivery Statement between Folkestone and Hythe District Council (LPA) and Otterpool Park LLP, July 2020, p. 44.

Appendix 1: Response from Kent Police

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**Kent
Police**

Protecting and serving the people of Kent

Kent Police Estate Services Department
Sutton Road, Maidstone
Kent, ME15 9BZ

Reference: Estates/Otterpool/Feb2021
Friday 26 February 2021

[REDACTED]
Senior Planning Policy Officer
Folkestone and Hythe District Council
Civic Centre
Castle Hill Avenue,
Folkestone,
Kent.
CT20 2QY.

Dear Mr [REDACTED]

Representations on behalf of Kent Police in respect of the Draft Proposals for Otterpool Park -Infrastructure needs.

We are aware that the Otterpool Park proposals are effectively for a New Settlement of around 12,000 new homes with a new population, based on average occupancy of 2.24 people per dwelling of perhaps 27,700. (albeit Council documents indicate close to 17,000).

It is in effect a new centre of population that will inevitably place increased demands on Kent Police.

In summary, the size, expected population and location of the development is such that Kent Police would require a secure building for staff working, KIT, IT and parking as 'accommodation', for the necessary additional personnel. In addition, for reasons explained below there will be a need for additional custody facilities and for initial start up costs and equipment for new personnel.

We set out below the justification for this request.

On behalf of Kent Police we make submissions in respect of likely infrastructure needs to ensure that adequate resourcing can be provided via Policy, CIL or S106 Agreements in respect of Otterpool Park and generally.

As you are aware, Kent Police is responsible for delivering services to address community safety, tackle the fear of crime and seek to achieve a reduction in crime in Kent through a number of methodologies including the detection of offenders. The primary roles of the police service are: Protection of life and property; prevention and detection of crime; and, maintenance of 'The Queens Peace' ('The Peace').

The delivery of growth and planned new development in the Folkestone and Hythe District Council area would impose additional pressure on the Kent Police existing infrastructure bases, which are critical to the delivery of effective policing and securing safe and sustainable communities. In the context of the prevailing planning policies and on the basis that the development proposals would impact on the ability of the Police to deliver an effective and efficient service, it is reasonable, having regard to the tests in CIL Regulation 122 that developers contribute towards mitigating these impacts via the Community Infrastructure Levy or via S106 contributions.

Kent Police will need to assess in detail the proposed developments within the Council's area for the plan period and the reliance on the large scale new settlement at Otterpool Park will require particularly close attention in respect of overall design and infrastructure needs and resourcing.

Accordingly, Kent Police advises, as it is not funded for such growth from other sources, that site specific policy, CIL contributions or S106 contributions will be needed to mitigate the aforesaid impact if there is not to be a detrimental impact on crime rates and service provision.

Kent Police would hope to be able to agree an expected population growth figure with the Council in order to inform the detailed calculations which we would ask to be based on the principles established by the formula produced by the Association of Chief Police Officers. (ACPO).

COMPLIANCE WITH CIL REGULATION 122

Having regard to Regulation 122 of the CIL Regulations (as amended in 2011) the following paragraphs set out how the required policing contributions are necessary to mitigate the impact of the development on the police service and fully accord with the criteria set out in both the Circular and the CIL Regulations.

THE ISSUE OF OTHER FUNDING SOURCES

There is no existing funding source for the police service to support this required growth in infrastructure from central or local taxation. The police service does not receive sufficient Central Capital funding for new growth related development. The funding allocated to the Police and Crime Commission via Home Office grants, Council Tax Precept and other specific limited grants, is generally insufficient to fund requests for capital expenditure whilst there is a time lag associated with the Police receiving operational funding.

Therefore without the receipt of proportionate contributions from new developments towards addressing the greater demands from policing generated by the proposed developments, staff would need to be redeployed from another area of the Division or County (thereby reducing the level of policing elsewhere). Furthermore vehicles would have to be removed from the already depleted Police Fleet elsewhere in the County.

Secondly, Officer Safety would be put at risk as they would have limited communication equipment as Kent Police would not be funded for such new equipment (radios, etc) and policing resources would be more thinly deployed. This may also impair responses to incident reports.

Therefore, without CIL contributions or S106 contributions towards police infrastructure, it is likely that policing will be adversely impacted upon and the creation of safe communities jeopardised. This would be directly at odds with the key planning objective to provide safe, sustainable communities.

Due to the Corporate Spending Reviews since the last economic recession, Kent Police's overall funding has been significantly reduced. It would be reasonable to assume there will be further economic reductions in funding as a result of Covid 19 expenditure and an increase in crime and disorder. The existing Kent Police estate is insufficient to accommodate the new staff and resources required. In addition and as a separate matter there is no funding currently for the additional staffing and resource needs that arise.

All planned developments within the Folkestone and Hythe District Council area will need to be assessed to quantify the necessary growth in staff numbers required (including detainee accommodation) to ensure compliance with the Police and Criminal Evidence Act with regards to the detention and treatment of detainees. The total contribution required for such a provision, which would be pro rata to each proposed development will also need to be calculated. For clarity 'staff accommodation' includes such matters as additional: office accommodation; briefing facilities; Rest Room/Restaurant facilities; Locker Room facilities; etc. necessary to support the increase level of staffing required. The provision of additional or reconfigured resources will have capital cost implications.

As stated, the scale and location of the development is such that Kent Police would require a secure building for staff working, KIT, IT and parking as 'accommodation'.

Based upon crime levels at the time (and pre Local Plan growth) and Kent Police Infrastructure requirements when first consulted back in April 2017, and based upon the 17,053 projected population growth, (as opposed to the more likely 27,000 figure) the projected growth in staff required to maintain the incident/staff ratios were:

1. 14 Police Constables
2. 2 Police Community Support Officers
3. 2 new and additional Sergeants
4. 1 new and additional Inspector

Funding for staff for three years is also required as there is always a lag between new population growth and receipt of increased payments.

The total contribution required will be calculated on a pro-rata basis in accordance with the principles Formula approved by ACPO. This will need to include a one off set up costs for such staff.

Kent Police will therefore need to seek funding for the required growth in staffing, accommodation (staff and Custody provision) for the above numbers as a minimum, albeit we expect the calculation likely to be at least 50% greater when population figures have been re-run for Otterpool.

There will also need to be contributions to staff 'start up' costs which covers such items as:

- Uniform and Protective Equipment (personal issue);
- Patrol Vehicles;
- Recruitment costs;
- Probationer Constable and staff induction training;
- IT equipment (including personal issue mobile communication systems);
- Furniture;

Work is still being undertaken to review how best to provide the accommodation in the Folkestone and Hythe DC area and final decisions have not been made.

In such circumstances we would request that a site specific policy is included in the Local Plan that requires both Capital funding for the staff accommodation costs and 3 year resource funding based on the ACPO formula. We would ask that the policy is flexible enough that this could either comprise on-site provision or off-site provision if review demonstrated that was a better option in the long run.

We would very much appreciate being provided with an opportunity to meet with you to discuss the likely growth in population within your administrative area to be able to finalise the calculation.

Kent Police will then be in a position to make final detailed submissions.

I look forward to hearing from you.

Yours sincerely,

[REDACTED]
Head of Estates

Kent & Essex Support Services Directorate



[REDACTED] Internal: [REDACTED]



[REDACTED]@kent.police.uk

Appendix 2: Response from Kent Fire and Rescue Service

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From: [REDACTED]@kent.fire-uk.org]
Sent: 02 March 2021 16:08
To: [REDACTED]@folkestone-hythe.gov.uk>
Subject: RE: Folkestone & Hythe District Council - requirement for blue light services at Otterpool Park

Good afternoon [REDACTED]

We are currently reviewing our front line emergency response provision and as yet have not identified any location changes for our fire stations in the Folkestone and Hythe area.

We do take into account new developments and infrastructure and are aware of the proposed Otterpool development, which after an initial evaluation did not present any opportunities to improve our response in the area.

We welcome your consideration of the blue light services and we would like to continue engaging with you on this topics.

Could you please send any further correspondence of this nature to emergencycover@kent.fire-uk.org which is the team who deal with all front line response changes.

Kind regards,

[REDACTED]
Resilience Manager, Operational Planning

Kent Fire & Rescue Service | T: [REDACTED] | Operational Planning|

www.kent.fire-uk.org | www.kentprepared.org.uk

Appendix 3: Response from South East Coast Ambulance Service NHS Foundation Trust

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From: [REDACTED] [REDACTED]@lakersllp.co.uk]

Sent: 03 March 2021 14:07

To: [REDACTED]@folkestone-hythe.gov.uk>

Cc: [REDACTED]@secamb.nhs.uk>; [REDACTED]
[REDACTED]@secamb.nhs.uk>

Subject: Folkestone & Hythe District Council - requirement for blue light services at Otterpool Park

Dear [REDACTED]

Thank you for your email yesterday morning (as below). We are retained as strategic estates advisors to South East Coast Ambulance Service NHS Foundation Trust (SECAMB) and this is the first communication that we appear to have received on this subject.

Following the merger of Surrey, Sussex and Kent NHS Ambulance Services in 2006, SECAMB now operates Emergency 999 and NHS 111 Clinical Assessment Service (CAS) across Surrey, Sussex, Kent and North East Hampshire. Having inherited and estate of largely physically, functionally, locationally and economically obsolete ambulance stations, SECAMB is implementing its more flexible and efficient "Make Ready" operational model – a network of hubs across the region with specialist teams to "make ready" (maintain, deep clean and stock) emergency vehicles and to which crews centrally report to collect a "made ready" vehicle on shift commencement. This ensures the more efficient turnaround of vehicles by specialist teams rather than leaving vehicle preparation to ambulance crews at multiple small traditional ambulance stations. The "Make Ready Centres" (MRCs)/hubs are then surrounded by "spokes" of small ambulance community response posts (ACRPs) across each Make Ready operating unit area. ACRPs provide community based welfare facilities for crews that are active on shift – often co-located with other blue light or public sector facilities. ACRPs are small flexible facilities which can be relocated and increased/decreased in number as patient demand varies over time. More information on Make Ready is available at this link: <https://www.secamb.nhs.uk/what-we-do/about-us/make-ready/>

Folkestone and Hythe falls under the area served by the existing Ashford Make Ready Centre. The Otterpool Park proposal that you have highlighted is unlikely of itself to require an additional Make Ready Centre though this and other new settlements across the South East will put pressure on existing MRC capacity meaning that further strategically located MRCs may well be required going forward. In the medium term the existing Hastings MRC, which is relatively small being a conversion from a former ambulance station is likely to need to be replaced with a larger facility – and likely even larger as a result of the new Otterpool Park settlement.

The provision of circa 8,500 plus new residential units will clearly generate increased demand on SECAMB with the likely need for additional strategically located ACRPs as well as greater MRC capacity.

Is there scope for s.106 or CIL funding to support the enlargement of MRC capacity and the additional ACRPs?

Finally, please include ourselves, [REDACTED] and [REDACTED] (cc'd) on future stages of any such consultation.

Kind regards

[REDACTED]
[REDACTED]



Tel: [REDACTED]
Fax: [REDACTED]
e-mail: [REDACTED]@lakersllp.co.uk

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[REDACTED]