



OFFICE OF THE POLICE &
CRIME COMMISSIONER FOR
SURREY

Mr Andrew Thompson
Guildford Borough Council
Milmead House
Milmead
Guildford
Surrey
GU2 4BB

Our ref: 25/GU/01521
Your ref: 25/P/01521

27th April 2026

Dear Mr Thompson,

25/P/01521 – Outline planning application with all matters except for the accesses from Guildford Road and Wyke Lane reserved, for subsequent approval for the demolition of the existing buildings and hardstanding and the erection of up to 200 residential dwellings including affordable housing and plots of self-build plots (Class C3); green and blue infrastructure and associated service and utility structures.

Surrey Police have reviewed our original comments (dated 9th December 2025) and have focused on the site-specific infrastructure, which in this case is the requirement for 3no. Automatic Number Plate Recognition (ANPR) cameras. This response should be read together with our previous response, as an updated comment.

Surrey Police have invested heavily in ANPR technology in the last ten years following a strategic assessment of crime pattern analysis under the banner of Operation Shield. The analysis conducted concluded that over 50% of crime within the county is carried out by the travelling criminal targeting areas using the arterial routes through the county. As a result, funding was made available to start the process of installing ANPR cameras around the county based upon the statistics provided. Due to insufficient funds, there has been a lack of ANPR infrastructure delivery in Guildford Borough, despite an identified need for ANPR coverage.

This is a crucial area of Surrey, when operation Shield was conducted the two main areas identified from intelligence and investigation, were the borders with the Metropolitan Police and Thames Valley Police. 50% of travelling criminals committing crime in Surrey came from these two areas alone.

S106 and CIL funding has been successful in providing ANPR coverage to aid policing within other boroughs and districts. The ANPR sites are a very cost-effective way to assist policing in terms of

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proactive policing by targeting live-time known vehicles of interest involved in crime. Also, the intelligence and investigation processes behind ANPR allows for effective interventions when tackling criminal activity.

Currently Surrey and Sussex Police have a combined read rate of 6 million reads per day, the data is stored, and only trained and authorised users can assess the data for intelligence gathering, crime investigation and targeting of known vehicles of interest involved in criminal activity.

There is a proactive side to the ANPR systems, for example, when the Police are interested in a vehicle(s) of interest. Data can be fed through the hotlists, and if a positive match is found, an alarm is generated. From the time of the read capture to the alarm being activated, is around 4 to 6 seconds.

The force control room staff are trained and monitor the ANPR systems, they manage the alarms that come in. Trained operational teams also monitor the alarms in a fast time situation from the mobile data systems.

Surrey Police have a maintenance contract for the support and maintenance of all fixed site and re-deployable ANPR cameras, this includes two preventative maintenance visits per site, per year. Surrey Police will be responsible for all ongoing maintenance costs. Furthermore, Surrey Police will install ANPR signs around the area at the cost to the police to enhance the message that ANPR cameras are in use.

Policing infrastructure

Having further discussed this development (25/P/01521 refers) with Surrey Police's Operation Command we have identified three suitable locations for ANPR infrastructure. Please find below maps identifying the location of each ANPR camera (red marker point = proposed ANPR camera site):

The cost of a fixed ANPR camera is shown below:

1) A234 Pirbright Road, 1 additional camera = **£7,500**



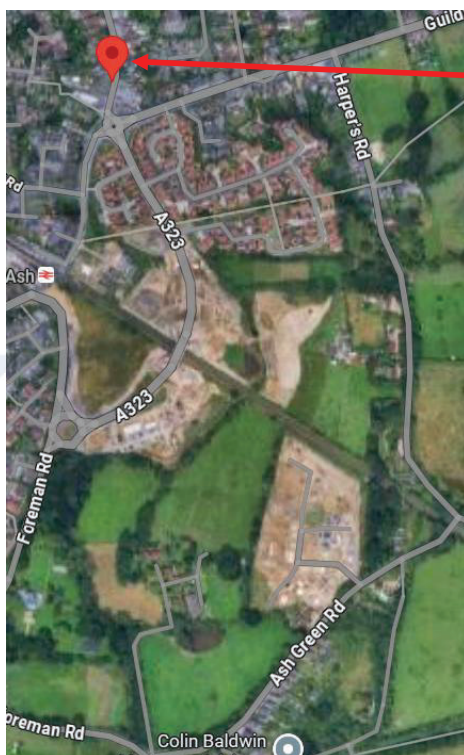
1) Additional ANPR location

2) A322 Guildford Road – 1 additional camera = **£7,500**



2) Additional ANPR location

3) B3411 Ash Hill Road, 1 additional camera = **£7,500**



3) Additional ANPR location

The above (3no.) locations were chosen based on local Officer's knowledge of crime and disorder and the routes that travelling criminality uses to avoid detection. These locations were chosen due to their proximity to the site and as good feeder routes into the Ash (and wider) area in relation to crime.

Cameras 1 and 2 would be located close (approx. 550m) to the east of the site's access point on Pirbright Road and Guildford Road. With regard to camera no. 3 (located on Ash Hill Road), this camera would be located within the wider vicinity of the site close to a busy roundabout (approx. 480m to the west of the site). Due to the nature of ANPR infrastructure, it does not always make sense to have the ANPR cameras positioned directly adjacent to the site boundary, a good balance and understanding of key routes within the vicinity of the area is essential for ANPR infrastructure to be beneficial to existing and future residents of Ash (and wider area).

Having analysed the local area, cameras 1 and 2 would be placed close to the development site, approximately 550m east of the proposed site vehicular access on Guildford Road. These ANPR camera would be situated on two main roads (A234 and A322) which serve the development and wider community from the east. The other camera (nos. 3) would be placed 480m to the west on key feeder routes into Ash Vale and beyond. This approach is largely dictated by the existing infrastructure and geographical issues in the locality.

Surrey Police are currently promoting a roll out of Automatic Number Plate Recognition (ANPR) Cameras throughout Surrey. The number and location of cameras is driven by the scale and location

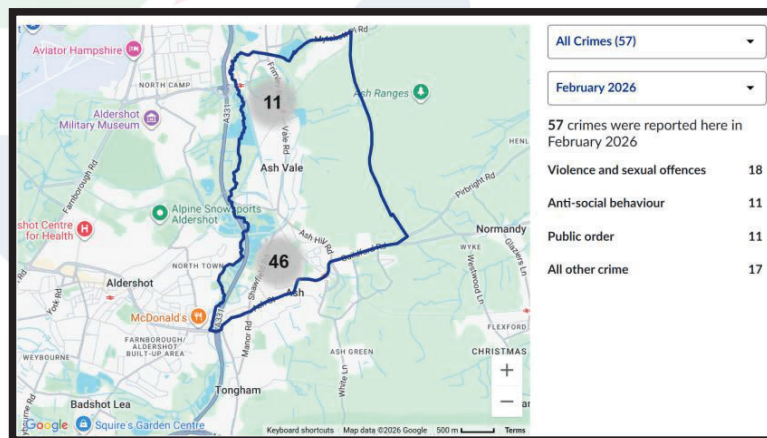
of new development and the road network in the area. Cross-border crime is a growing issue in Surrey with criminals travelling from London and the surrounding Home Counties into Surrey to commit offences. The locations identified above would assist in closing off local 'rat-runs' in close proximity to the scheme and within the wider area serving the development.

ANPR cameras are used in three keyways by police forces: 1) to identify vehicles known to be used by criminals and disrupt their activity; 2) to gather intelligence and 3) to investigate crime. There are many benefits of ANPR cameras which can be used overtly or covertly and are regulated by the Regulation of Investigatory Powers Act 2000 (RIPA). Using cameras at either fixed locations or portable locations (please note this request is for permanent, fixed location ANPR infrastructure), images are captured and recorded along with the vehicle registration mark (VRM) or number plate, time and location of the vehicle, which can then be instantly checked against database records of vehicle of interest. The instant search of database records of vehicles of interest can confirm whether a vehicle associated with a known criminal has been in the area at the time of a crime. Importantly, ANPR can be used in real time. This means that police officers can intercept and stop the vehicle, check it for evidence and make arrests if necessary. The use of ANPR in this way has proved important in the detection and prosecution of many cases of major crime.

As stated in our previously submitted comments (9th December 2025) the proposed development of 200 residential units would have an estimated population of 516 (based on occupancy). Applying the current ratio of 'incidents' to predicted population, this development would generate an additional 104 incidents (and 31 additional recorded crimes) per year for Surrey Police to attend. This is a direct consequence of the proposed development.

With regard to *Image 1* below, this map shows there were 57 crimes reported in the outlined area below in February 2026. This 'snapshot' emphasises why ANPR cameras are required in the proposed locations. Surrey Police are happy to provide further crime data and crime heat maps to further demonstrate local crime patterns in the area, to further support the need for ANPR infrastructure.

Image 1: Crime Map of Ash Vale and Ash Wharf



Source: [Ash Vale And Ash Wharf | Your area | Surrey Police | Surrey Police](#)

Surrey Police have a duty to respond to all incidents and many of these incidents are not recorded as crimes. We deliver crime prevention and presence, attendance and service lead at emergencies e.g. RTA's or flooding, counter terrorism and community reassurance. We must also attend all incidents involving deaths, attend crowd and events policing, attend and input to community safety and crime partnerships, and provide referral responses when there are expressed concerns about the safety of children, the elderly and those with special needs.

The submitted Transport Assessment (October 2025, produced by Mayer Brown) details that, the proposed development will generate approximately 104 two-way vehicular movements during the AM peak hour period and 91 two-way vehicular movements during the PM peak period (Para 5.8). The submitted Transport Assessment, also identifies Guildford Road within its modelling (i.e. it is recognised this road is a 'feeder route' into Ash and beyond) for the surrounding highway network. This demonstrates why ANPR infrastructure is required within the wider vicinity of the development site.

It should, however, be noted that the above information only reveals statistics generated from the proposed development. What must be kept in mind is the new residents and users of the proposed development may unfortunately be themselves the victims of crime. A better methodology/statistic, in our opinion, is the one used above (and as contained within our original letter), which estimates that the proposed development would result in an additional 104 incidents per year for Surrey Police to attend. Please note this figure doesn't consider incidents that may occur during the construction phase, or as a result of the other uses on site.

The three principal benefits of using ANPR are: 1) Increase the information and intelligence available to identify criminals; 2) Enable the police to deploy resources to respond to criminals of interest in real time; 3) Improve investigations after crimes have been committed.

In addition, to the benefits of ANPR coverage for the residents of this development the ANPR cameras would also serve to identify any crimes occurring on the development site during the construction phase such as the theft of machinery or building materials, given the Guildford Road and Pirbright Road cameras would be situated close to the site access (approx. 550m to the east). Theft is a huge challenge that, according to the latest industry calculations, costs the UK construction industry at least £800M a year - not including incidents that go unreported. And with sustained inflation increasing the price of goods, and the cost-of living crisis putting pressure on purse strings, the attached research indicates that the situation is becoming untenable. This is taken from the BauWatch Report (**Appendix 6**).

Out of the 500 construction site workers surveyed in the a '*Unseen Threats: 2024 Construction Crime Index*' survey, two-thirds of people (62%) agreed that it has increased in the last year (2023). On the other hand, just 2% reported that it had decreased. The cadence of crime is also more shocking than many will have realised, with approximately 70% of respondents confirming they had witnessed theft on-site at least once a year, and a fifth (19%) saying they experience it every few months. Astonishingly, one in three individuals said they had been regularly approached by people wanting to '*sell things off the back of a lorry*', exposing the appetite for the re-sale of materials and the brash approach criminals are willing to take. In addition, 31% of projects have been delayed due to

construction crime and 24% of stolen goods are vehicles or expensive machinery. Therefore, the provision of ANPR close to the development site vehicle access, would also serve as an effective preventative security measure for the development, during the construction phase.

Additionally, these cameras will be able to feed into the Surrey County Council (SCC) journey time system to monitor traffic movement in the area to better help and inform traffic management plans. As such the installation of these ANPR cameras can assist in delivering sustainable benefits via the collection of traffic movement data.

The creation of safe and accessible environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion is fundamental to planning for sustainable development as confirmed in the National Planning Policy Framework (NPPF, December 2024). Ensuring new development takes full consideration of crime prevention and the provision of adequate infrastructure to support policing is clearly outlined within the NPPF, relevant sections of the Planning Practice Guidance (PPG) and Section 17 of the Crime and Disorder Act 1998 (as amended),

Paragraph 20 [‘Plan-Making’] of the NPPF states *‘Strategic Policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: infrastructure for transport, telecommunications, security...’*

In addition, paragraph 96 of the NPPF [‘Promoting healthy and Safe Communities’] states that *‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...’*

Paragraph 101 of the NPPF states *‘To ensure faster delivery of other public service infrastructure such as...blue light...local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.’*

Paragraph 102 states *‘Planning Policies and decisions should promote public safety and take into account wider security and defence requirements by, anticipating and addressing possible malicious threats and other hazards (whether natural or man-made, especially in locations where large numbers of people are expected to congregate. 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 and 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. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development.’*

The Woking Core Strategy (October 2012), states at Chapter 3.0 of its *Spatial Vision, Objectives and Strategy*, point 6 that: *‘To encourage the high-quality design of buildings, neighbourhoods and the public realm that creates a sense of place where people feel safe to spend time and interact without*

fear of crime.’ In addition, Policy CS21 (Design), states that ‘*proposals for new developments should...create a safe and secure environment, where the opportunities for crime are minimised.*’

Given the outlined benefits and advantages of ANPR as detailed above, there is a clear justification for the installation of ANPR to promote public safety and deter crime and disorder, in accordance with the aims and objectives of the NPPF (December 2024) and the policies and objectives, contained in the Woking Core Strategy (December 2012).

It should be noted that with regard to the provision of Closed-Circuit Television (CCTV) on-site, all CCTV systems are owned and maintained by the local councils (within Surrey). The Police only review live data when required or demanded by incidents through portals. Officers can also access this information, post incident for evidential purposes. As such, Surrey Police will not be requesting contributions for on-site CCTV. However, Surrey Police do advise that CCTV should be considered and secured at the application stage and are happy to advise on best locations etc.

1. Compliance with National Policy and CIL Regulations

Following the abolition of CIL regulation 123 the funding of infrastructure is no longer restricted to 5 separate developer contributions. Within Guildford the majority of policing is carried out by the NPT teams, therefore our office would recommend funds received from Section 106 agreements should be spent directly on supporting these teams. Therefore, when contributions from new housing development are pooled it is sensible to do this based on NPT areas which in this case of this development is the Ash Vale and Ash Wharf NPT.

The assessment for these infrastructure contributions is outlined in CIL Regulation 122, which requires each item to meet the following three tests. From the numerous appeal / Secretary of State decisions and High Court judgements there is significant evidence that all the items listed in this request comply with CIL Regulation 122.

The costs of training officers have been included in this request and have been found sound (and compliant with Regulation 122) in numerous appeal decisions included as **Appendix 2**. In the respect of training in particular, the Sketcheley house decision (page 19 of **Appendix 2**) makes specific reference to ‘protective clothing, uniforms and bespoke training’ and were endorsed by the Inspector in his report at paragraph 11.57 and by the Secretary of State at paragraph DL22.

It is therefore plain that the Secretary of State and numerous Planning Inspectors consider that National Planning Policy and legislation is capable of encompassing these types of infrastructures.

1. Necessary to make the proposed development acceptable in planning terms

The creation of safe and accessible environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion is fundamental to planning for sustainable development as confirmed in the National Planning Policy Framework (NPPF, December 2024).

Guidance notes 4.6.2 of the adopted Local Plan advises that Infrastructure is a very broad term: *'The Planning Act 2008 as amended defined infrastructure as roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. Guidance on the CIL advises that infrastructure also includes cultural and sports facilities, district heating schemes, police infrastructure and other community safety features.'*

Policy D1 (Place Shaping) states that all new development will be designed to reduce opportunities for crime and antisocial behaviour. In addition to the overarching need for the contributions to make the development acceptable, it is also considered that, given that this contribution secures the benefit of a safe and secure environment, the contributions benefit from local plan policy support.

Police contributions are, in principle, within the lawful ambit of the policy regime which requires financial contributions from developments to help defray the external costs of the proposals which would otherwise fall on general taxation.

The Secretary of State has recognised that it is not a rigid requirement to have express reference to policing within local planning policy because the overarching principle of ensuring safe communities is recognised in the NPPF. The Planning Inspector in the case of North-west Leicester District Council vs Money Hill Consortium (**Appendix 4**) stated:

'62. The obligations of the Undertaking, other than that to support Police operations, are all related to requirement of development plan policies and are all necessary to make the development acceptable in planning terms. They are all furthermore, directly related to the development, are fairly and reasonably related in scale and kind to the development, and are in place to mitigate the effects of the development. The Legal Agreement, setting aside the Police contributions, therefore complies with Regulation 122 of the CIL Regulations 2010. Furthermore, taking into account the submissions of NWLDP, LCC and LP, the Agreement complies with Regulation 123 of the CIL Regulations 2010.'

63. The contributions of £219,029 towards Police infrastructure is not related to requirement of development plan policies. The figure has been arrived at following a close and careful analysis of the current levels of policing demand and deployment in Ashby. The proposed development, in terms of population increase, would have a quantifiable and demonstrable effect on the ability of the Police to carry out their statutory duties in the town. LP has not sought any contribution to some aspects of policing, such as firearms and forensics, but only for those where there is no additional capacity. The contribution is necessary because the new housing that would be created would place a demonstrable additional demand on Police resources in Ashby. The financial contributions to Police operations thus satisfies Regulation 122 of the Community Infrastructure Levy Regulations 2010 and a provision of the Undertaking would ensure that the contribution also satisfies Regulation 123 of the Community Infrastructure levy Regulations 2010.'

The importance of policing contributions is importantly recognised in recent court judgments and considered an essential core principle of the NPPF. The judgment of Mr Justice Green 01/11/2016 (**Appendix 1**) with regard to the High Court challenge of Jelson Limited vs Secretary of State for Community and Local Government (1) Hinkley and Bosworth District Council stated:

'The gist of the Inspectors reasons are adequately set out in paragraphs [44]-[47] (see above). She records that LP has adequately demonstrated that the sums would be spent on equipment and services which arose "...Directly from the new households occupying the proposed development". Accordingly she concluded, in terms of causality, that there was a proper nexus between the expenditure and the new development. She also records that the proposed spending was properly attributed between individual projects and procurement such as property adaption and contributions towards a vehicle in order to prevent a need for pooling contributions.'

'Mr Lambert cited empirical data based upon existing crime patterns and policing demand and deployment from nearby residential areas which established the direct and additional impacts of the development upon local policing. That data established that there would be an incremental demand in relation to such matters as calls and responses per year via the police control centre; an increase in annual emergency events within the proposed development; additional local non-emergency events which trigger follow-up with the public; additional recorded crimes in the locality based upon beat crime and household data and a proportionate increase in anti-social behaviour incidents an increase in demand of patrol cover; and, an increase in the use of vehicles equating to 12% of an additional vehicle over a six year period.'

Moreover, the wider principles of sustainable development within the NPPF also require consideration of all necessary infrastructure requirements, as observed by Foskett J in *R. (Police and Crime Commissioner for Leicestershire) v Blaby DC and others* (**Appendix 3**). This judgment stated:

'11. It is obvious that a development of the nature described would place additional burdens on local health, education and other services including the police force. The focus in this case is upon the effect upon the local police force. If it sought to shoulder those additional and increased burdens without necessary equipment (including vehicles and radio transmitters/receivers for emergency communications) and premises, it would plainly not be in the public interest and would not be consistent with a policy that encourages "sustainable development": see for example, paragraphs 17 of 79 of the National Planning Policy Framework (NPPF). It is that that leads to the Claimants interest in the matters.'

As shown in Section 1, there is no dedicated Government funding to comprehensively cover the capital costs associated with policing new housing development. Unless contributions from new developments are secured then Surrey Police would be unable to maintain the current levels of policing with resources diverted and stretched, inevitably leading to increased incidents of crime and disorder within the local area. Surrey Police strive to reduce the level of crime in the County however due to the significant numbers of new housing being brought forward the need for more front-line staff and associated infrastructure has never been more relevant as a fundamental planning policy consideration.

Appeal decision APP/C3240/W/16/3144445 (**Appendix 2**) issued on the 21st March 2017 provides further support for developer contributions towards the capital costs of additional policing infrastructure arising from new development. The Planning Inspector stated:

'165: There is no doubt that the proposed development would generate a need for policing and that need would require additional resources which have been calculated on a pro-rata dwelling basis.'

The Framework identifies a need for safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. In addition, an extensive array of appeal decision supports the principle of police contributions. Overall, the balance of the evidence before me points to the obligation (based on the underlying pro-rata calculation) being necessary and proportionate mitigation for the development.'

We would also bring to attention dicta from the High Court judgment by Mr Justice Foskett in *Police and Crime Commissioner for Leicestershire vs Blaby Council* (**Appendix 3**). Paragraph 61 and 62 of the judgment state:

'61. I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble of 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 want to know that the police service can operate efficiently and effectively in the area. That would plainly be "consumer view" of the issue. The providers of the service (namely, the Claimant) have statutory responsibilities to carry out and, as the witness statement of the Chief Constable makes clear, that itself can be a difficult objective to achieve in these financially difficult times. 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.

62. 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 police with sufficient contribution to its funding requirements to meet the demands of policing the new area: lawlessness in one area can have effects in another nearby area. Miss Wigley, in my judgment, makes some entirely fair points about the actual terms of the section 106 Agreement so far as they affect the Claimant.'

Appeal decision APP/K2420/W/15/3004910 (**Appendix 2**) provides further evidence for developer contributions towards necessary policing infrastructure required to enable effective policing of new housing development. The Planning Inspector supported the methodology used for this calculation and compliance with the specific capital infrastructure items detailed in our request.

'44. Leicestershire Police (LP) have demonstrated adequately that the sums request would be spent on a variety of essential equipment and services, the need for which would arise directly from the new households occupying the proposed development. It would be necessary, there, in order to provide on-site and off-site infrastructure and facilities to serve the development commensurate with its scale and nature consistent with LP Policy IMP1. The planning contribution would also enable the proposed development to comply with the Framework's core planning principle of supporting local strategies to improve health, social and cultural wellbeing and delivering sufficient community facilities to meet local needs.'

In respect of the methodology used for this request the same Planning Inspector stated '47 – *I consider this to be a no less realistic and robust method of demonstrating the criminal incidents likely to arise in a specific area than the analysis of population data which is normally used to calculate*

the future demand for school places. The evidence gives credence to the additional calls and demands on the police service predicted by LP'.

A financial contribution towards essential policing infrastructure is clearly essential to make new housing development acceptable in planning terms. The policing infrastructure items outlined in this request are essential to help support new officers required due to population growth and most importantly keep existing and future residents of Guildford safe.

2. Directly related to the proposed development

There is a functional link between new development and the contributions requested. Put simply without new development taking place and the subsequent population growth there would be no requirement for the additional infrastructure. The additional population growth will lead to an increase in incidents, which will require a Police response. The infrastructure outlined in this request has been specifically identified by the NPT teams policing the areas of Guildford as necessary to deal with the likely form, scale and intensity of incidents this new housing development will generate.

3. Fairly and reasonably related in scale and kind to the proposed development.

Securing proportionate developer contributions towards necessary capital expenditure is essential to help meet a proportionate increase in police infrastructure costs and to enable Surrey Police to maintain its current level of service in the borough. This infrastructure has been identified by Surrey Police as necessary to provide an appropriate level of policing to serve the proposed development and maintain the existing high level of community safety.

A clear numerical, evidence-based approach has been demonstrated which is supported by case law and recent appeal decisions by the Planning Inspectorate. The various items of capital expenditure and infrastructure requested are considered CIL compliant and are necessary to enable new officers to undertake their role to meet the policing needs of the development and mitigate impacts to existing resources. A reasonable and proportionate approach has been adopted.

We would also highlight two recent appeal decisions in Leicestershire (APP/F2415/A/12/2179844 & APP/X2410/A12/2173673, **Appendix 2**). In assessing the request from Leicestershire police for developer contributions towards infrastructure the Inspector commented at para 29 of decision 2179844;

'The written evidence submitted by Leicestershire Police detailed the impact the proposed development would have on policing, forecasting the number of potential incidents and the anticipated effect this would have on staffing, accommodation, vehicles and equipment. In view of the requirement of national planning policy to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life, it is considered that, on the evidence before me, a contribution towards policing is necessary to make the development acceptable in planning terms.'

Furthermore, with regard to appeal decision 2173673, the Inspector is unequivocal in highlighting the acceptability of police contributions being recipients of developer's contributions;

‘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.’ [Para 292]

These appeal decisions confirm that the approach of Surrey Police in assessing the impact of development, having regard to an assessment of the potential number of incidents generated by growth is appropriate, and fundamentally it confirms that police infrastructure should be subject to developer contributions as the provision of adequate policing is fundamental to the provision of sustainable development.

Furthermore, the requirement to ensure that crime and the fear of crime is addressed through the planning process runs through the revised NPPF (December 2024);

Paragraph 20(b) retains reference to ‘security’ infrastructure and advises that strategic policies should set out an overall strategy for the pattern, scale, design and quality of development, and make sufficient provision for:

b) Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).

Paragraph 96(b) advises that planning policies should aim to achieve healthy, inclusive and safe places which:

‘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 routes and cycle routes, and high quality public space, which encourage the active and continual use of public areas.’

Paragraph 101 states that:

‘To ensure faster delivery of other public infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.’

Paragraph 102 outlines the importance of engaging with the security services to inform planning policy decision and promote public safety and defence requirements. This will be achieved by:

- a) Anticipating and addressing possible malicious threats and natural hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant area (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. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development; 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.

The Glossary to the current NPPF (December 2024) includes an entry entitled '*Essential Local Worker*'. It states '*these are public sector employees who provide frontline services in areas including health, education and community safety – such as NHS Staff, teachers, police, firefighters and military personnel, social care and childcare workers*'. This recognises the emergency services as essential for the public, alongside education and health.

I trust this sets out sufficiently our Office's request for infrastructure contributions relating to this development at Shortlands Farm, Guildford Road, Ash, Guildford, GU12 6DF. In the absence of developer contributions towards the provision of essential policing infrastructure, Surrey Police would raise **objection**, as the additional strain placed on our resources would have a negative impact on policing of both the development and force-wide policing implications within the borough. I am more than happy to discuss the content of this submission with yourselves and support with any further evidence if considered necessary.

Yours sincerely

Jane Thatcher

Jane Thatcher

BA (Hons), MSc, MRTPI

Joint Commercial Planning Manager

Sussex and Surrey Police

Part A

'What', 'where' and 'when' of infrastructure requirements relevant to application reference to 25/P/01521

TOPIC	INFRASTRUCTURE REQUIREMENT	AREA	COST PER ITEM	QTY	TOTAL COST	TIMING OF DELIVERY (Occupations)
Policing	ANPR	A234 Pirbright Road	£7,500	1	£7,500	Prior to commencement
Policing	ANPR	A322 Guildford Road	£7,500	1	£7,500	Prior to commencement
Policing	ANPR	B3411 Ash Hill Road	£7,500	1	£7,500	Prior to commencement
Total					£22,500	

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Appendix 1 – Jelson Ltd vs Secretary of State and Local Government (1) Hinkley and Bowsoth District Council (2) – 22/11/2016 (paragraphs 71-81)

Appendix 2 – Examples of appeal decisions supporting police contributions

- APP/Y3615/W/23/3320175 – Land at the Former Wisley Airfield, Hatch Lane, Ockham, Surrey
- APP/E3715/W/21/3268629 – Land North of Coventry Road, Long Lawford, CV23 9BT
- APP/T3725/W/21/3270663 – Land South of Chesterton Gardens, Leamington Spa
- APP/W3710/W/20/3251042 - North Warwickshire and South Leicestershire College, Hinckley Road, Nuneaton, CV11 6LS
- APP/Y0435/W/20/3251121 - Land at Brickhill Street, South Caldecotte, Milton Keynes, MK17 9FE
- APP/R3705/W/19/3234056 - Land East of Islington Farm, Tamworth Road, Wood End, Warwickshire
- APP/R3705/W/18/3196890 – Land to the south of Tamworth Road and to the west of the M42, Tamworth, B78 1HU
- APP/C3810/W/17/3187601 – Land west of Church Lane and south of Horsemere Green Lane, Climping, West Sussex, BN17 5RY
- APP/R3650/V/17/3171287 – Dunsfold Park, Stovolds Hill, Cranleigh, Surrey, GU6 8TB
- APP/R1845/W/17/3173741 – Land off The Lakes Road, Bewley, Worcestershire, DY12 2BP
- APP/C3105/W/17/3172731 – White Post Road, Banbury.
- APP/C3105/W/16/3163551 – Land off Howes Lane and Middleton Stoney Road, Bicester, Oxfordshire
- APP/C3810/V/16/3143095 – Land east of Fontwell Avenue, Fontwell, West Sussex, BN18 0SB
- APP/E3715/W/16/3147448 – Land at Ashlawn Road West, Rugby, Warwickshire
- APP/C3240/W/16/314445 – Land east of Kestrel Close / Beechfields Way, Newport, Shropshire
- APP/K2420/W/15/30004910 – Land off Sherbourne Road, Burbage, Leicestershire
- APP/G2435/A/14/2228806 – Money Hill, Land North of Wood Street, Ashby-de-la-Zouch, Leicestershire
- APP/X241-/W/15/3007980 – Land rear of 62 Iveshead Road, Shepshed, LE12 9ER
- APP/T3725/A/14/2221613 – Land at the Asps, bound by Europa Way (A452) to the east and Banbury Road (A425) to the west
- APP/T3725/A/14/2229398 – Land South of Gallows Hill / West of Europa Way, Heathcote, Warwick
- APP/G2435/W/15/3005052 – Land South of Greenhill Road, Coalville, Leicestershire
- APP/Q3115/A/14/2222595 – Land north of Littleworth Road, Benson
- APP/A2470/A/14/2222210 – Greetham Garden Centre, Oakham Road, Greetham, Oakham
- APP/A2470/A/14/2227672 – Land to the rear of North Brook Close, Greetham, Rutland
- APP/L2440/A/14/2216085 – Land at Cootage Farm, Glen Road, Oadby, Leicestershire
- APP/Y2430/A/14/2224790 - Land to the east of Nottingham Road, Melton Mowbray, Leicestershire
- APP/2460/A/14/2213689 – Land rear of 44-78 Ashby Road, Hinkley, Leicestershire
- APP/K2420/A/13/2208318 – Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire
- APP/F2415/A/14/2217536 – Land off Fairway Meadows, Ullesthorpe, Leicestershire
- APP/K2420/A/13/2202658 & APP/A/13/2210904 – Land off (to the south of Spinney Drive and land off (to the east of) Brookside, Barlestone, Leicestershire
- APP/H1840/A/13/2199085 & APP/H1840/A/13/2199426 – Land off Pulley Lane, Newland Road and Primslan Way, Droitwich Spa

Appendix 3 – The Queen (on the application of The Police and Crime Commissioner for Leicestershire) vs Blaby Council and Hallam Land (and other developers).

Appendix 4 – North-west Leicester District Council vs Money Hill Consortium – Money Hill, Land North of Wood Street, Ashby-De-La-Zouch (paragraphs 61-63)

Appendix 5 – APR1845W173173741 – Land of Lakes Road – Worcestershire

Appendix 6 – BauWatch Report

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