

Preventing Crime and Disorder	
Summary of Comments Received (respondent ref in brackets)	Council's Response
Support for the initiative (25, 2)	The Council notes the support
Provision of Youth facilities should be listed as a crime prevention initiative (25)	The draft topic paper lists the current crime prevention initiatives adopted by the Council. However, the SPG recognises that additional initiatives may be implemented as and when resources permit and need arises.
The objectives of the 'West Berkshire CCTV System' should also include a general objective of reducing crime, the fear of crime and incidents of anti-social behaviour.(25)	The objectives listed in the SPG are the adopted objectives of the West Berkshire CCTV system as set out in the Council's CCTV Policy. The Council intends to prepare a CCTV Strategy that will provide additional guidance to the SPG in due course. Until such time it would be inappropriate to amend the wording of the SPG.
Inclusion of a reference to the designing in of facilities for "Young Firefighter" schemes within appropriate developments sought within document (9)	Provision of community buildings and facilities to promote community engagement are covered by Topic Paper 5. However, the Council recognises that inclusion of a reference to the crime preventative benefits of social and community inclusion may assist in taking forward the "Young Firefighter" and other schemes and assisting in reducing crime and disorder. The topic paper is amended to include a new paragraph to reflect the comments.
Expectation of contributions from commercial development for off-site crime prevention schemes is unreasonable given the existing need for commercial premises to provide and maintain on-site security measures (27) No justification for commercial development contributing to the "wider remit" of crime prevention initiatives (3)	The Council considers the impact of commercial development on the personal safety of employees of such development and the protection of land and buildings from antisocial actions should be the responsibility of the developer and/or employer. This is set out within the SPG. In addition, the Council considers that built development, whether residential or commercial, increases the opportunity for crime and anti-social behaviour, or the perception of it, and therefore considers it is reasonable that such development should also contribute to the wider remit of crime prevention initiatives pursued by the Council, in the interests of maintaining a safe and secure environment for employees, visitors and the general public.

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SPG should not be seen as a substitute for an increase in the numbers of police on the street (2)	The SPG is not intended to be seen as such.
SPG is unnecessary, outside the justification of Circ 1/97 and can be dealt with by condition. (3)	In line with government advice the Council will seek to secure appropriate crime prevention measures through the imposition of conditions wherever possible. However, the Council recognises that the use of conditions may not be appropriate in all cases, and considers it appropriate therefore to ensure that measures targeted at preventing crime and anti-social behaviour are accommodated within the SPG
Policy OVS.3 does not refer to contributions towards preventing crime and disorder. The topic paper is therefore not supported by local plan policy, contrary to government advice. (4)	Policy OVS.3 does not provide an exhaustive list of subjects to which contributions will be sought rather it covers all forms of development which might create impacts on local services, infrastructure and amenities.
Add "where there is agreement that the obligations sought meet the tests set out in Circular 1/97" in order for the paper to properly reflect Circ 1/97 (14)	The Core Guidance maintains that the contributions sought shall relate to the proposed development. It also notes that in all cases contributions will be considered on their merits and agreed through negotiation, which itself requires agreement between parties. In this regard the Council considers the SPG already reflects the intent of the proposed amendment.
Thresholds	
Maintenance payments should be for exception circumstances, time limited and not required in perpetuity, in line with guidance in Circ 1/97. Crime prevention measures are not given as an example in the circular. Paragraph 4.8 fails to reflect this requirement. (14) Maintenance period of 20 years should be deleted from the topic paper as it is contrary to the provisions of Circ 1/97 (12, 1) 20 year maintenance contribution has no sound basis and requires constant monitoring (3)	The Council considers it is important to secure the on-going maintenance of provisions established through S106 agreements and developer contributions to ensure that the impact of the development is mitigated for the life of the development without placing undue demands on the public purse. Without appropriate arrangements to ensure on-going future maintenance the Council considers the impact of the development will be merely delayed rather than met. The Council recognises the advice provided within Circ 1/97, and

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	<p>that Circ 1/97 states that planning obligations “ can provide a means ...to meet the costs imposed as a result of the development – eg the full cost of essential community facilities required as a direct result of a proposed development Where development will create a need for extra facilities it may be reasonable for developers to meetthe cost of providing such facilities”.</p> <p>Additionally, the Council notes that the examples of paragraph B14 of Circ 1/97 are examples and not necessarily the exhaustive list of exceptions and recognises that the advice given within the Circular is not legally binding on the local authority.</p> <p>The Council accepts the need for constant monitoring of all S106 agreements occurring in response to this SPG and is taking the necessary steps to ensure this takes place</p>
<p>Requirements for developments of less than 15 dwellings should be deleted from the topic paper as it is contrary to the provisions of Circ 1/97 (12, 1)</p>	<p>The Council considers that even small developments have an impact on local services and facilities. In accordance with the revised Core Guidance paper contributions will be considered from developments of 1 dwelling or more. The SPG has been revised to reflect the revised core guidance and has been amended to remove reference to 15 dwellings.</p>
Processes	
<p>Finances raised should have a central funding point so that appropriate allocation of funds can benefit all areas and not solely new development areas (25)</p>	<p>Contributions are required to be related to the proposed development. It is envisaged that a central fund will be established into which contributions will be paid, but the contributions will be towards anti-crime initiatives targeted to the areas within which the development is occurring in order to ensure the direct relation between development and contribution.</p>