



ASSOCIATION OF  
**AMBULANCE**  
CHIEF EXECUTIVES



Association of  
Police and Crime  
Commissioners



**NFCC**  
National Fire  
Chiefs Council



**NPEG**



**NPCC**  
National Police Chiefs' Council

**National Fire  
Estates Group**

Planning Development Plans  
Department for Levelling Up, Housing and Communities  
Planning Directorate  
3<sup>rd</sup> Floor, North East  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

18th October 2023

Dear Sir or Madam,

**LEVELLING-UP AND REGENERATION BILL  
CONSULTATION ON IMPLEMENTATION OF PLAN-MAKING REFORMS – JULY 2023  
JOINT RESPONSE OF THE EMERGENCY SERVICES**

This joint representation to the consultation is submitted on behalf of the emergency and rescue services of England. This means it is submitted on behalf of 94 ambulance, fire & rescue and police organisations and so benefits from the very considerable material weight of this support.

It is very important to emphasise that this submission is just the latest phase of our partnership work with the Government on the subject of planning reform. In particular, the detailed discussions and accompanying technical work that has taken place with respect to the Levelling-up and Regeneration Bill (LURB), the Infrastructure Levy (IL), the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG).

To summarise, the requests of the emergency services of England are as follows:

1. The opportunity should be seized to make development plans truly sustainable which can only be achieved if the emergency services are engaged within the plan-making process.
2. The list of prescribed public bodies should be expanded to include the emergency services, allowing local authorities the opportunity to capture the wealth of knowledge that the emergency services have, allowing development plans to be better shaped for the benefit of the existing and future communities that they serve.
3. That the emergency services should be able to submit representations to both development plans and supplementary plans and that these be given proper consideration by local authorities and planning inspectors alike.

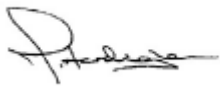
4. The essential infrastructure that the emergency services require as a result of development should be delivered in such a way that new communities receive the emergency services they need without there being any negative impact on existing communities.
5. Development plans must ensure the infrastructure and design requirements (including fire safety, water for firefighting, designing out crime, access for emergency vehicles, defibrillator provision and civil resilience) included in policies, supporting text and associated documents take full account of and act on the advice and evidence provided by the emergency services.
6. The new development plan-making process must allow the emergency services to engage positively throughout and after plan adoption. Digital live engagement will only be effective if documents are actually 'live' in practice.

Our responses to the consultation questions are contained in **Appendix A**. In the interests of brevity, we have only responded to those that are directly relevant to our concerns and priorities.

The Government is asked to carefully consider these representations and respond positively in due course. Revisions to plan-making policy offer a great opportunity to ensure that promoting fire safety, crime reduction, civil resilience and suitable access for the emergency services to development schemes are important features of the future English planning system.

We look forward to receiving your reply.

Yours sincerely



Mark Hardingham QFSM  
Chair  
National Fire Chiefs Council



Donna Jones  
Chair  
Association of Police and Crime Commissioners



Anna Parry, Managing Director  
On behalf of  
Daren Mochrie, Chair  
Association of Ambulance Chief Executives



Gavin Stephens QPM  
Chair  
National Police Chiefs' Council



Ian Potter  
Chair of Strategic Growth  
National Police Estates Group



Mark Arkwell  
Interim Chair  
National Fire Estates Group

**Appendix A**  
**Consultation on Implementation of Plan-Making Reform – July 2023**  
**Responses to Consultation Questions**

The chapter and paragraph references in this appendix refer to the online response pages of the Plan-Making Reform consultation.

**Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?**

We welcome the core principles highlighted in Chapter 1, in particular paragraphs 14 and 21. We note paragraph 21 states:

*We propose to make it clear in policy that sustainable development should run as a golden thread throughout plans, with growth being directed to suitable locations and supported by required infrastructure and good design.*

In order for development to be sustainable – and to not have a corresponding *negative* impact on existing communities – the emergency services’ infrastructure requirements must be referred to in the new development plans. In the context of plan objectives there is a reference, in para. 14, to affordable housing but no reference to emergency services’ infrastructure:

*details of any infrastructure requirements, or requirements for affordable housing, which development over the plan period should meet...*

We recognise that our infrastructure requirements are not the only objective of sustainable development, but we need to seize this opportunity to correct the current ambiguities in the plan-making process and clearly include emergency services’ infrastructure requirements in planning policies.

**Question 6: Do you agree with the proposal to set out in policy that planning authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins?**

We applaud the desire to have development plans adopted quickly as this results in certainty for the communities that they represent. We note in para. 62:

*We will expect that issues are resolved with statutory consultees and stakeholders during the mandatory consultation window, with an opportunity to make modifications to the plan prior to the submission.*

Ensuring that local authorities are required to consult with the emergency services will be the best way to ensure that the emergency services’ experience and advice can be captured to help inform the plan and highlight what infrastructure will be needed and what this infrastructure might look like.

**Question 29: Do you have any comments on the proposed list of prescribed public bodies?**

There is an omission in the list of prescribed public bodies in para. 159 of Chapter 9. The emergency services have a wealth of information and experience on public safety, preventing harm, reducing crime and the fear of crime, creating safe spaces, travel times for emergency vehicles and the essential infrastructure needed to support development. Omitting them from the proposed list of prescribed public bodies is an oversight; the communities represented by the development plan will benefit from the emergency services’ input and they should therefore be included.

We hope that this sharing of knowledge and experience for the benefit of the communities can be carried out with the existing resourcing levels where possible but highlight that consideration should be given to which organisations may reasonably require a new burdens assessment to support this process, as resourcing may become an issue for some, as a result of development plans being prepared more frequently.

***Question 39: Do you have any views on how we envisage the Community Land Auctions process would operate?***

Creating certainty for land prices and thus the amount available for community uses would be welcomed. We are supportive of any mechanism that results in a clear level of developer contribution being paid as part of the development process. We look forward to learning more about the community land auction when the Department publishes its proposals in more detail and commences the public consultation process on this point.