

15th April 2026

Dear Tim Salter,

**Subject: S106 Funding Request – Application Ref R25/0565
Land South East of Rugby Road, Clifton upon Dunsmore**

I write to set out the justification and methodology underlying the Police and Crime Commissioner for Warwickshire's Section 106 infrastructure contribution request of £45,957.63, required to mitigate the impacts of the proposed development on policing services and infrastructure.

The explanation below is taken directly from The Police and Crime Commissioner for Warwickshire's adopted capital cost calculator, which has been developed using real organisational cost data drawn from estate rebuild valuations, fleet replacement records, and the actual capital costs incurred in the recruitment and equipping of police officers and staff.

The calculator applies these evidenced costs to a recognised measure of demand by assessing the ratio of households to full-time equivalent policing staff within the Rugby Borough area. This enables a transparent and proportionate assessment of the uplift in policing infrastructure required to maintain existing service levels as new households are created.

1. Basis of the Assessment

The Police and Crime Commissioner for Warwickshire utilise a consistent, evidence-based calculator to quantify the capital infrastructure required to support population growth whilst maintaining current policing service provision.

The methodology is applied consistently across Warwickshire and is founded on the following principles:

- a) Growth in households results in increased demand for policing services
- b) This generates a requirement for additional police officers, police staff, fleet capacity, and accommodation
- c) Section 106 contributions secure capital investment only and do not fund ongoing revenue costs

The proposed development comprises up to 160 new dwellings, which directly informs the staffing, accommodation and fleet calculations set out below.

2. Methodology

A. Recruitment and Equipping of Officers and Staff – £10,426.97

The staffing requirement is derived by applying the established ratio of households per policing full-time equivalent to the number of new dwellings proposed.

- Existing households in Rugby area: approximately 47,000
- Ratio of households per policing FTE (based on force-wide establishment): 125.94
- New households: 160
- New FTE requirement: $160 \div 125.94 = 1.27$ FTE

This FTE requirement is then apportioned between police officers and police staff using the force's approved establishment ratio:

- Police officers: 0.57
- Police staff: 0.43

This results in a requirement for approximately:

- 0.73 police officers
- 0.54 police staff

Each role has a defined one-off capital start-up cost, taken from the actual costs incurred by Warwickshire Police for recruitment, ICT provision and personal issue equipment:

- Officer one-off capital cost: £11,754.56
- Staff one-off capital cost: £3,432.70

Applying these costs produces a total recruitment and equipping requirement of £10,426.97.

These costs cover capital-only items including ICT equipment, radios, body-worn video, uniforms, lockers, vetting, and associated procurement costs.

B. Police Vehicles – £3,577.18

The fleet contribution is calculated using the current replacement value of the police vehicle fleet serving the Rugby area and the number of households within the district.

- Fleet replacement value (Rugby allocation): £981,764.46
- Households in Rugby area: 43,912
- Fleet value per household: £22.36

Applying this per-household figure to the proposed development:

- $160 \text{ households} \times £22.36 = £3,577.18$

This ensures that additional policing demand created by the development is matched with proportionate fleet provision, without diminishing vehicle availability for existing communities.

C. Police Office Accommodation – £31,953.48

The additional officers and staff generated by the development require appropriate office accommodation and welfare facilities. Capacity within the existing estate is constrained.

In line with the Police and Crime Commissioner's Estates Strategy 2025–2030, the approach to accommodation seeks to ensure a modern, flexible and fit-for-purpose policing estate capable of adapting to operational demand and community growth.

While a specific accommodation site has not yet been identified for this proposal, the capital contribution will be used to deliver, expand or refurbish suitable office accommodation within the police estate to ensure capacity exists to meet the uplift in demand.

The calculation applies the following:

- Office space requirement per FTE: 11 m² (BCO standard)
- New FTE requirement: 1.27
- Total space required: 13.97 m²

Using an evidenced cost per square metre derived from rebuild valuations across the existing police estate:

- Cost per m²: £2,286.51

This results in an office accommodation requirement of:

- 13.97 m² × £2,286.51 = £31,953.48

3. Summary of Contributions

The Section 106 contribution sought in relation to this application is as follows:

- Recruitment and equipping of officers and staff: £10,426.97
- Police vehicles: £3,577.18
- Office accommodation: £31,953.48

Total contribution: £45,957.63

4. Compliance with CIL Regulation 122

The requested contribution satisfies all three statutory tests:

1. Necessary – The development creates measurable additional policing demand requiring capital investment
2. Directly related – The calculations apply solely to the households proposed under this application
3. Fairly and reasonably related in scale and kind – The contribution is derived from real, auditable police cost data, applied consistently across Warwickshire

This methodology has been repeatedly accepted by Planning Inspectors at appeal and inquiry within Rugby Borough and across Warwickshire as demonstrated in Appendix 1.

I trust this provides sufficient clarity regarding the basis and justification for the requested contribution. Should the Inspector, Applicant or Planning Authority require further technical detail or a walkthrough of the calculator, I would be happy to assist.

Yours sincerely,

Calum Walmsley
Head of Estates and Assets
Office of the Police and Crime Commissioner for Warwickshire
calum.walmsley@warwickshire.police.uk

Yours sincerely,

A handwritten signature in black ink, appearing to be 'CW', followed by a horizontal line extending to the right.

Calum Walmsley
Head of Estates and Assets
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Appendix 1.

Planning Application	Application: R17/1089 – Rugby Borough Council Land North of Coventry Road, Long Lawford, CV23 9BT	The development proposed was originally described as ‘development of 153 residential dwellings with associated landscaping, public open space and infrastructure, including an amended junction between the A428 Coventry Road and Back Lane.
Background Detail	Rugby Borough Council / Warwickshire Police Public Inquiry 01 September 2021	52. Contributions would also go towards the staffing, equipment, premises and vehicle requirements of Warwickshire Police and improvements to the library facilities at Rugby library. The contributions would address the impacts of the occupiers relying on these services. Both contributions are based on established methodologies within the borough and reflect the number of new occupiers. They meet the tests for planning obligations. Similarly, a contribution to address identified shortfalls in education provision also satisfies the tests.
Appellants:	Bloor Homes Limited	
Appeal Reference	APP/E3715/W/21/3268629 Reference: APP/E3715/W/21/3268629	
Planning Application	R13/2102 - Rugby Borough Council Land at Ashlawn Road West, Rugby, Warwickshire , CV22 5RZ	The development proposed is the demolition of existing buildings, erection of up to 860 dwellings, land for potential primary school,
Background Detail	Secretary of State Decision: Allowed - 10 July 2017 Rugby Borough Council / Warwickshire Police	30. Having had regard to the Inspector’s analysis at IR158-166, the planning obligation dated 17 February 2017, paragraphs 203-205 of the Framework, the Guidance and the Community Infrastructure Levy Regulations 2010 as amended, the Secretary of State agrees with the Inspector’s conclusion for the reasons given in IR166 that the obligation complies with Regulation 122 of the CIL Regulations and the tests at paragraph 204 of the Framework and is necessary to make the development acceptable in planning terms, is directly related to the development, and is fairly and reasonably related in scale and kind to the development. 156. Warwickshire Police (WP) requested a sum of £185,278 towards police infrastructure that would mitigate the impact of the proposed development. This contribution has not been disputed and should be secured in a S106 planning obligation. It reflects the precise need that would arise from the development of up 860 new homes on the appeal site based on WP’s experience policing development in the area. The contribution would be used to mitigate the impact on infrastructure where there is no spare capacity and would accord with Core Strategy Policy CS10. Appendix 3 of the Core Strategy includes police as one of the critical infrastructure requirements to ensure delivery and mitigation, which are expected to be included in a S106 Agreement.
Appellants:	David Wilson Homes (East Midlands) and Gallagher Estates Ltd	
Appeal Reference	APP/E3715/W/16/3147448 – Public Inquiry Reference: APP/E3715/W/16/3147448	

Planning Application	W/20/0617 – Warwick District Council Land south of Chesterton Gardens, Leamington Spa	The development proposed is an outline planning application for a residential development of up to 200 dwellings with associated access, landscaping and public open space (all matters reserved apart from access).
Background Detail	12 August 2021 Warwick District Council / Warwickshire Police	Police Contribution: £33,645 towards the recruitment and equipping of police staff, the provision of police vehicles and the provision of police office accommodation...
Appellants:	A. C. Lloyd (Homes) Ltd	54. The tables in section 6 of the CIL Compliance Statement explain how the above planning obligations comply with the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulation 2010 (as amended) and paragraph 57 of the NPPF.
Appeal Ref and Procedure	APP/T3725/W/21/3270663 – Public Inquiry	56. In my view, all of the obligations in the s106 Agreement are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Therefore, they all meet the tests within Regulation 122 (2) of

	Reference: APP/T3725/W/21/3270663	the CIL Regulations and should be taken into account in the decision. The development makes adequate provision for any additional infrastructure and services that are necessary, including affordable housing, arising from the development.
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Planning Application	Application: 036050 North Warwickshire & South Leicestershire College, Hinckley Road, Nuneaton, CV11 6LS	The development proposed is the development of up to 195 dwellings together with the provision of a 3G sports pitch, associated public open space, and other green infrastructure, and landscaping.
Background Detail	09 November 2020 Nuneaton & Bedworth Borough Council Public Hearing	40. I have considered the legal agreement against advice in the Framework and the tests in Regulation 122 of The Community Infrastructure Levy Regulations 2010, as well as the requirements of the development plan.
Appellants:	Raj Joshi	41. In the light of Borough Plan Policies H1, H2, HS1 and HS5, and having regard to the evidence before me, I have no grounds to find the intended affordable housing, and contributions to education, healthcare, primary care and policing would not be necessary, related to the development or proportionate. Using the agreement to secure the provision and management of the sustainable drainage scheme and the public open space is also appropriate.
Appeal Reference	APP/W3710/W/20/3251042 – Reference: APP/W3710/W/20/3251042	

Planning Application	PAP/2018/0762 Land East of Islington Farm, Tamworth Road, Wood End, Warwickshire	The development proposed is residential development (Class C3) with associated access, landscaping, open space and drainage infrastructure, with all matters reserved save access.
Background Detail	30 April 2020 Public Hearing North Warwickshire Borough Council / Warwickshire Police	3. A signed and dated S106 agreement was produced at the hearing. This includes an obligation to provide up to 50% affordable housing. It also requires the developer to make financial contributions towards the provision of sustainable travel packs, improvements to public rights of way and a bus stop, police services, youth provision, off-site leisure and healthcare. I shall return to this matter below.
Appellants:	Summix IFW Developments Ltd	37. I have considered the S106 Agreement in line with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and paragraph 56 of the Framework. These state that planning obligations must only be sought where they are necessary to make development acceptable in planning terms, are directly related to the development and are fairly and reasonably related in scale and kind to the development.
Appeal Reference	APP/R3705/W/19/3234056 Reference: APP/R3705/W/19/3234056	

		39. Detailed correspondence outlining the requirements from the increased population for healthcare and policing was submitted by the relevant bodies in relation to the original application...
		42. I conclude that the terms of the S106 agreement meet the tests set out above and thus I will take them all into account as material considerations. Nevertheless, all obligations other than that relating to affordable housing provide mitigation for the impacts of development, rather than any specific benefits.

Planning Application	PAP/2017/0602 Land to the south of Tamworth Road and to the west of the M42, Tamworth, B78 1HU	The development proposed is described as residential development of up to 150 dwellings, open space, landscaping, drainage features and associated infrastructure, with full approval of the principal means of access and all other matters reserved.
Background Detail	01 April 2019 North Warwickshire Borough Council / Warwickshire Police	46. I also accept that the other obligations of that UU, involving financial contributions to mitigate impacts on hospital, healthcare and police services would be policy and legally compliant. 48. I conclude that with the exception of the proposed biodiversity offsetting obligation, the proposal would provide adequate justified mitigation for the effects of development on local infrastructure.
Appellants:	Taylor Wimpey UK Ltd	
Appeal Reference	APP/R3705/W/18/3196890 – Public Hearing Written Representations <u>Reference: APP/R3705/W/18/3196890</u>	

Scheme details			
Name	Land South East, Rugby Road, Clifton Upon Dunsmore		
Address	Rugby		
Total number of households			160.00

General Office Accomodation			
			Office of National Statistics - "Warwickshire Mid-Year 2023 Population Estimates". Published (2024)
1	Number of Housholds in Rugby	47,000.00	
2	Total number of Officers/Staff	373.19	Based on total employment 31st March 2024 / % of households in wider Warwickshire
3	Number of Households per staff member (1)/(2)	125.94	
4	Number of new Households	160.00	
5	New staff members required	1.27	
6	Total existing office space (Non-Specialist)	34,006.00	Based on review of floor areas
7	Office space per member of staff m2	11.00	Based on BCO reccomendation of 10-12m2 per person
8	New accomodation required m2	13.97	
9	Cost of exisitng accomodation per m2	£ 2,286.51	Based on rebuild valuation / m2 of freehold estate
	Total cost of General Office accomodation required	£ 31,953.48	

Police officer costs			
16	One off Start up costs per police officer	£ 11,754.56	Based on finance employment data 2024/25
17	Ratio of police officers to staff	0.57	Based on employment 31st March 2025
18	Number of police officers	0.73	
	Total costs	£ 8,551.73	

Police staff costs			
18	One off start up costs for police staff	£ 3,432.70	Based on finance employment data 2024/25
19	Ratio of staff to officers	0.43	Based on employment 31st March 2025
20	Number of staff	0.55	
	Total staffing costs	£ 1,875.24	

Vehicle Costs			
18	Current Fleet value	£ 981,764.46	Based on stock list at 31/04/2024
	Households in Warwickshire	43,912.34	
19	£'s fleet per household	£ 22.36	
	Number of new households	160.00	
20	Total value of fleet required	£ 3,577.18	
21	Total S106 Claim for Capital contributions	£ 45,957.63	