



**Kent
Police**

Protecting and serving the people of Kent

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Dear sirs

Dover District Local Development Framework: Whitfield Urban Expansion Draft Masterplan/Supplementary Planning Document - Kent Police Consultation Response

Kent Police refers to the current consultation process in relation to the planned development at Whitfield and your letter to it's Mr W. G. Wallis dated 30 September 2010 (reference FP/SCY/LDF 15/Consultation) and responds as follows.

Kent Police is concerned no reference is given in the Supplementary Planning Document to Community Safety. It has identified mention is made of the provision of a new police station as part of the proposed 'District Centre' (Section 7.19) but, of course, community safety is far wider than just the provision of new facilities. The term 'Police Station' has various connotations. It could mean a main operating base with full policing facilities (Public Enquiry Office; significant Custody provision; conference/training facilities, etc) from which a large geographical area would be served. The new police station at Northfleet, for instance, has a Gross Internal Area circa 11,500m² and houses policing resources for the Gravesham and Dartford Boroughs as well as some centralised units/facilities. The other extreme could be a small local operating base of no more than 50m² with, perhaps, some shared facilities with other agencies. The locations of new police stations are determined by Kent Police Authority/Kent Police and based on strategic plans in order to ensure the most effective and efficient delivery of policing services to the public of Kent. The provision of a new police station at Whitfield (as previously described) does not feature in such current plans. Having said this, the operational structure of Kent Police is currently under review and should this situation change Kent Police will advise Dover District Council accordingly. In the meantime, to assist it's current review; Kent Police would be interested in learning what type of police facility was envisaged. Kent Police does, however, acknowledge some form of Operating Base may become a requirement in relation to this proposed development and is grateful this potential has been recognised by Dover District Council.

Community Safety covers a wide range of activities designed to reduce the likelihood of crime, disorder, anti social behaviour, road casualties (reference to pedestrian safety is acknowledged) and fires that impact on people's quality of life. It also involves reducing the fear of crime, harm caused by drug and alcohol misuse and behaviour damaging to the environment.

Safe communities are a pre-requisite to achieving sustainable communities, by encouraging community cohesion and stability, resident wellbeing and overall vibrancy. While a degree of criminal activity and anti-social behaviour can be designed out of new developments, design measures alone will not address community safety fully. It is important to emphasise that safety relates not only to good design, but also to ensuring appropriate community safety infrastructure is in place. Implementing Secured By Design (SBD) and CCTV are themselves very useful but insufficient to tackle crime, fear of crime, and community safety comprehensively. Therefore, in addition to design measures, Neighbourhood Policing is one of a number of methodologies adopted by Kent Police to make our communities safe. Neighbourhood Policing is a national initiative aiming to put communities – their needs, their issues and their priorities - at the heart of local policing (Kent Police would suggest these three community drivers should also be at the heart of any planning decision). In terms of policing this is achieved through active collaboration between Police, partners and the public to solve local crime and disorder problems, improve the quality of life for residents across the neighbourhood and increase feelings of security.

Crime and disorder has a tangible impact on economic growth, social exclusion and quality of life issues. What is a given, is that with growth there is expected to be more crime and disorder. Without a range of community safety measures to address this, in spatial planning terms principally but not exclusively, design measures and infrastructure provision:

- Crime trends will rise;
- Police response times will reduce;
- Fear of crime will increase;
- Community cohesion and wellbeing will suffer;
- Expectations will not be met.

Negative perceptions are formed and new inhabitants and businesses may not choose to move in or existing residents and businesses stay.

Collectively, there are only limited opportunities to ensure new developments within new and existing communities are safe and secure, creating a sense of place where people want to live, work, invest and play. The current consultation is a key opportunity to recognise the importance of community safety in its widest sense, and to ensure its needs, whether in design measures or new infrastructure, are reflected.

Recognising that local authorities will have a greater leadership role in delivering growth, it is relevant to highlight that the Crime and Disorder Act 1998 introduced a wide range of measures for preventing crime and disorder. Section 17 (as amended by Schedule 9 of the Police and Justice Act 2006), imposes an obligation on every local authority (which includes Planning Authorities) and other specified bodies to consider crime and disorder reduction in the exercise of all their duties. It states:

"17(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and the misuse of drugs, alcohol and other substances in its area."

This duty extends to spatial planning and "place shaping".

Planning Authorities should therefore facilitate the objectives of other legislation where land use considerations arise. Any omission or under-emphasis of community safety would clearly be contrary to this duty, and the emphasis given in Sustainable Community Strategies (and the new

PPS12), the emerging Regional Spatial Strategy (RSS), and other guidance such as PPS1 (infrastructure provision and safety generally).

If growth takes place without fully taking account of community safety requirements Local Authorities are putting at risk their high-level objective of creating sustainable and safe communities.

To support the delivery of Safer Communities Kent Police has an expectation the SBD award scheme standards for new buildings; SBD principles for external areas/public realm design; and, 'Park Mark' standards for car parks (including 'Park & Ride') will be adopted by developers/owners on all planning applications. This will ensure 'designing out opportunities' for crime and anti social behaviour are maximised. Kent Police believes the inclusion of SBD standards and principles will compliment the other aims and objectives contained within the Supplementary Planning Document.

Kent Police believes the Supplementary Planning Document should robustly emphasise Dover District Council's support of and need for developers to demonstrate how their developments will address community safety/crime prevention. This is a requirement of Circular 1/2006 and Safer Places – the Planning System and Crime Prevention (ODPM). Recently revised CABA guidance on these Statements has placed greater emphasis on this point.

In summary it is critical that Supplementary Planning Documents deal with a number of issues explicitly and directly as follows:

- Full recognition of community safety.
- High-level policies and supporting statements that cover the principles of community safety, design and infrastructure requirements. Again a commitment to monitoring the success of schemes in achieving the SBD award would be a useful tool for driving up quality of design.
- The emergency services must be clearly identified as a key public service provider within any definitions of "community" or "social" infrastructure.

Kent Police would like to encourage Dover District Council to commit to early engagement with it on, and monitoring of, the delivery of community safety infrastructure and the involvement of the emergency services on this proposed development site.

In support of this submission Kent Police encloses a copy of its latest version of the draft document 'Policing Plan On Proposed Infrastructure Developments – Dover District Council Area'. This will shortly be provided to Dover District Council on a consultation basis. Kent Police will then seek to enter in to constructive dialogue with Dover District Council, as it is doing with other local authorities within the County, before issuing the final document. Not only does this document go into greater detail in relation to the issues highlighted above but also provides information on Kent Police current 'Community Safety Infrastructure' as well as evidence of the requirement for developer contributions towards policing services in relation to developments as proposed. This document is based on the national Association of Chief Police Officers (ACPO) 'Toolkit' in relation to such matters (details of which have previously been provided) and explains how such contributions are calculated. Kent Police can advise that if such a development were to be built it would seek Developer Contributions via the Planning Authority as summarised below based on a contribution of £290 per dwelling person and on the assumption the necessary Secure By Design/Park Mark principles were adopted within the design. If such principles were not adopted then Kent Police reserves the right to seek larger contributions reflecting the need generated by the development for greater police presence:

COST BY UNIT TYPE

Residential Cost/Dwelling Person	£290
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Dwelling size	Ave Household size (persons)	Cost per unit (£)
1 bed	1.5	436
2 bed	2.5	726
3 bed	3.5	1016
4+ beds	4.5	1307
Active elderly persons (1 bed)	1	290
Active elderly persons (2 bed)	1.2	348

Full details of what such contributions will be spent on will be provided once detailed planning specifications are available. This may or may not include: assistance in the provision of new facilities; some expansion of existing facilities; or, some local contact/operational base either on its own or part of a 'Gateway' within the development; and/or, some expansion of infrastructure for those services delivered to residents in the Dover District Council area which are operated from a central point (Forensics, Major/Serious Crime investigation, Roads Policing, etc.) but which, nonetheless, Dover residents benefit from.

Unless Kent Police can seek appropriate infrastructure contributions as part of developer funded planning obligations, it cannot guarantee maintaining the same level of policing within the Dover District Council administrative area as growth takes place.

Kent Police is willing to work with and assist Dover District Council in these very important matters including attending any meeting(s) it may be felt appropriate to hold. In the meantime, should Dover District Council: have any queries; require any further information; or, wish to arrange a meeting please do not hesitate to contact the writer.

Yours faithfully

Trevor R Hall
 Developer Contributions Manager
 cc: