

Kent Police
Policing Plan
On
Proposed Infrastructure Developments
Dover District Council Area



**Kent
Police**

Statement to Dover District Council
Evidence of Requirement for
Developer Contribution
towards
Policing Services

Local Development Framework

Submission Date
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17th November 2010
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Executive Summary

In order to achieve the substantial savings required and improve productivity and efficiency, Kent Police has embarked upon a comprehensive programme of improvement covering all aspects of the business as part of its Strategic Vision. This programme includes a number of key work streams, which will enable resources to be used to maximum effect in meeting the needs of our communities. These work streams are grouped within seven core themes, which form the basis of the longer-term commitment to VfM. They are summarised below:

- Business re-modelling (matching supply to demand)
- Reducing overtime
- Process re-engineering (aligned to reducing bureaucracy)
- Expanding collaboration & maximising partnerships
- Embedding VfM measures within our performance regime
- Maximising our use of technology
- Harnessing innovation

This document and the requirement for developer contributions is an integral part of the Strategic Vision for the delivery of efficient and effective policing services. The benefits realised to date through the above work have had a direct positive impact on the level of developer contributions being requested. Any future financially quantifiable benefits realised will be reflected in specific requests made for such contributions on a case-by-case, development by development basis

The processes adopted by Kent Police in preparing its case for developer contributions is based upon national guidance to the police services contained within the Association of Chief Police Officers (ACPO) Strategic Growth Toolkit details of which have previously been provided to you. During the development of this Toolkit ACPO used two planning consultants namely RPS and BNP Paribas (formally Atis Real). In addition ACPO sought legal opinion on the Toolkit from Ian Dove, QC of No 5 Chambers. That Opinion includes:

'...the approach that has been taken in the Planning Obligations Toolkit, which seeks to relate the impact to the relationship between population growth and the increase

in the incidence of crime, is a reasonable method of seeking to assess the impact upon the Police Service of additional development'

He went on to say:

...the Planning Obligations Toolkit in terms of the formula of calculation proposed and the means of identifying the deployment of contributions is, in my view, framed within the principles of the Circular (Circular 05/2005), enabling weight to be given to the planning obligations sought and, indeed, refusals for failure to make such contributions'.

He further adds:

'...I see no objections in principle to contributions to the one-off costs associated with the infrastructure for setting up staffing...'

and:

'What the toolkit provides is a framework reflecting the principles of the Circular' (Circular 05/2005)

Police forces do not receive central government funding for the capital cost of growth related policing infrastructure. Kent Police's initiative has resulted from concern about the ability to fund additional policing services that will be necessitated in the future by the delivery of new housing and employment development around the County notwithstanding the changes introduced by the new Government.

Using the Toolkit Kent Police has undertaken a detailed review of the currently projected developments within the Dover District Council area and the impact these will have on requirements for policing having regard to existing and future funding. Based on a national best practice formula approach supported by Ian Dove, QC, it has identified that in order to provide efficient and effective policing to the proposed development, a developer contribution towards policing is required as follows in relation to residential developments only at this time. Kent Police will provide details for business/commercial developments in due course. Such contributions will be subject to annual review including potential indexation until such contributions are received by Kent Police:

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

Kent Police will undertake to spend this money on providing additional policing infrastructure and other associated matters as detailed within this document. For the avoidance of doubt this policing contribution has been calculated on the assumption that the proposed developments will be designed and built in accordance with Secure by Design guidance. Where such guidance has not been followed Kent Police reserves the right to seek further developer contributions to cover the additional costs of providing an effective and efficient policing service resulting from this.

Under the present planning and legal system, the police are a legitimate recipient of developer contributions towards policing and there are precedents in Kent and elsewhere of policing contributions being secured under Section 106 Agreements and planning conditions.

Kent Police is therefore requesting that Dover District Council has due regard to the contents of this statement when negotiating and finalising the developer contributions whether under a Section 106 Agreement, Community Infrastructure Levy Regulations or any other legislative framework or methodology from time to time in existence when considering planning applications for proposed developments.

Part 1



**Kent
Police**

Strategic Overview

1. Kent Police Strategic Vision:

- 1.1 In recent years, policing has been subject to an increasing number of demands, challenges and new policy initiatives. In the last 5 years, Kent Police has developed a strong efficiency culture, which sees it well placed to mainstream Value for Money (VfM) principles across the business. It has already realised significant and sustained savings through strong financial management and a number of efficiency initiatives. These include a well-established collaboration with Essex Police, the application of “Lean” process review methodology and consolidation of some of the support functions. Increased partnership working through Community Safety Units (CSUs) and the CARE partnership along with joint analytical products have enabled us to deliver a range of coordinated services combined with greater efficiency.
- 1.2 In order to achieve the substantial savings required and improve productivity and efficiency, Kent Police has embarked upon a comprehensive programme of improvement covering all aspects of the business. This programme includes a number of key work streams, which will enable resources to be used to maximum effect in meeting the needs of our communities. These work streams are grouped within seven core themes, which form the basis of the longer-term commitment to VfM. They are summarised below:
- Business re-modelling (matching supply to demand);
 - Reducing overtime;
 - Process re-engineering (aligned to reducing bureaucracy);
 - Expanding collaboration & maximising partnerships;
 - Embedding VfM measures within our performance regime;
 - Maximising our use of technology;
 - Harnessing innovation.
- 1.3 In delivering the commitment to VfM Kent Police is drawing on resources across the corporate functions. Kent Police benefits from a dedicated Corporate Change Directorate, which is managing the restructuring programme and designing an effective model for future-proof service delivery. Additional support is provided through specialist staff that contribute

to the many work streams within the programme. VfM principles are also being incorporated in the Continuous Improvement Review Programme (governed by the Police Authority) to ensure that VfM is embedded across the business.

1.4 There are also a number of key strategic themes, which provide the context for the overall Kent Police accommodation strategy:

- The need to support the key priorities in the Kent Policing Plan: Building Public Confidence; Effectively Tackling Crime and anti-social behaviour; Protecting the public; Making The Best Use of Resources;
- The requirement to demonstrate effective use of resources and efficiency gains, through ongoing improvements to key operational processes and the structure of the workforce;
- A drive to improve collaboration with Essex Police; SE Region forces; British Transport Police and joining up with non-police partner agencies to deliver improved services to the public at local level (local authorities; Border Agency; etc);
- Greater focus on carbon footprint and environmental impact of all public sector organisations;
- The likelihood of ongoing focus and potentially unpredictable public policy changes impacting on the way policing is delivered (including greater collaboration in key areas);
- The Policing White Paper Policing in the 21st Century: Reconnecting police and the people’;
- High Level Working Group Report on Police Value for Money;
- ‘Total Place’ – Publication dated 25 March 2010. Kent was one of thirteen pilot sites for this which Kent Police participated in.

1.5 Against this background Kent Police Authority and Essex Police Authority have entered a Collaboration Agreement to deliver some joint services. Although this work is continuing, areas where collaboration has been agreed cover both ‘Back Room’ and ‘Front Line’ roles including: Procurement; IT services; Specialist/Serious Crime; etc. Other main areas of ‘Back Office’ business are also being reviewed including: HR; Finance; and, Estates Management.

- 1.6 The Kent Policing Model (KPM) is dynamic and constantly evolves. Work is underway (KPM 3 Review) to review the structure of the delivery and policing services.
- 1.7 This document and the requirement for developer contributions is an integral part of the Strategic Vision for the delivery of efficient and effective policing services. The benefits realised to date through the above work have had a direct positive impact on the level of developer contributions being requested. Any future financially quantifiable benefits realised will be reflected in specific requests made for such contributions on a case-by-case, development by development basis.
- 1.8 In relation to Dover District Council administrative area, within the context of the Strategic Vision, Kent Police has undertaken a review of the policing implications of the proposed residential developments until 2026. This has been done within the current context where the public sector is undergoing considerable review by the Government and the implications of that will not be known until at least late October 2010 when the Comprehensive Spending Review is published. Whatever the outcome of that the Government has already made it very clear there will be a requirement on police authorities and police forces to maintain front line services. This document deals with the impact the developments will have on such delivery and the contributions sought from developers to offset that in order that Kent Police may continue to maintain public safety through effective and efficient service delivery.

2. Introduction

- 2.1 Kent Police has undertaken a review of the policing implications of the proposed residential developments within the Dover District Council area until 2026. This statement sets out Kent Police's position in relation to the proposals.
- 2.2 Whatever the outcome of the Spending Review there will be a requirement to maintain front line services. This document deals with the impact the developments will have on such delivery and the contributions sought from developers is to offset that in order that Kent Police may continue to maintain public safety through effective and efficient service delivery.
- 2.3 Kent Police operates a multi-tiered service across the County with operations ranging from Neighbourhood Policing, which provides the local tier of services, through to force-wide functions. All levels of the police service must be fully resourced to enable delivery of an effective and efficient service.
- 2.4 The method of calculating developer contributions contained within this document establishes the impact of developments within the Dover District Council area on the Kent Police infrastructure. It identifies the need for new staff and associated accommodation at the local, Basic Command Unit (BCU) and Force-wide levels arising from the impact of District wide developments. It is based on a formulae, an overview of which has already been sent to Officers, details of which are contained within this document.
- 2.5 Impact on the immediate locality: Where the scale of any development warrants provision of an on-site police facility, contributions would be directed towards provision of such a facility.
- 2.6 Impact on adjacent parishes/wards: Developer contributions are intended to be directed principally towards local policing staff and accommodation within the Dover District area.

- 2.7 The wider impact/area: Kent Police operates certain functions beyond Dover District Council boundaries which, whilst necessary to the delivery of the police service within the District, would be inefficient and unviable if replicated within each local authority area/BCU in the County. Some of these, such as Forensic Services; Roads Policing; Tactical Operations; Serious & Organised Crime Directorate; Counter Terrorism; Frontier Control; etc. are centrally based to serve the whole County. However, the functions remain a crucial component of the service delivered by Kent Police that Dover relies upon, and new developments within the Dover District Council administrative area will place a greater demand on those functions, giving rise to the need for additional staff. A proportion of the developer contributions may, therefore, be directed towards functions at the force-wide level.
- 2.8 Kent Police Authority has a statutory duty to secure the maintenance of an efficient and effective police force for its area under the direction and control of its Chief Constable, thus ensuring the safety and security of the public. A companion good practice guide, 'Safer Places – The Planning System and Crime Prevention (2004)' provides guidance on creating safe and secure places and refers to the scope for S106 Agreements to be used to create safer environments within the area of the proposed development. All this assists the police with partner agencies to deliver community safety.

2.9 What is Community Safety?

- 2.9.1 Community Safety covers a wide range of activities designed to reduce the likelihood of crime, disorder, anti social behaviour, road casualties 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.

2.10 Why is Community Safety from a policing perspective so important?

2.10.1 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 development, design measures alone will not address community safety fully. Neighbourhood Policing is a national initiative aiming to put communities – their needs, their issues and their priorities - at the heart of local 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. To deliver this form of policing effectively, a physical presence within existing and new neighbourhoods is sought, together with new or expanded support facilities elsewhere where needed. The Policing Pledge, signed by all Police Forces nationally, sets a commitment to a consistent standard of policing and engagement with the community, giving communities a stronger voice and improved contact and awareness of their Neighbourhood Police Teams.

2.10.2 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.

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

2.10.4 Collectively, we only have 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 LDF

process 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 in emerging, and reviews of existing, documents.

2.11 What form does Police Community Safety infrastructure take?

2.11.1 Kent Police operates 6 Basic Command Units (BCUs). Within each are Local Police Units (LPUs) corresponding with district or borough boundaries. Most Police functions come under local policing (neighbourhood policing), operational support, major crime, specialist operations, performance & strategic issues, and human resources.

2.11.2 While there are several forms of infrastructure needs (including CCTV, Automatic Number Plate Recognition and communication (e.g. Airwave masts systems), property provision is the most significant. The typical hierarchy of property provision is as follows:

- Neighbourhood Police office
- LPU Station/shop (small town)
- BCU HQ Station
- Force HQ
- Support (e.g. training, storage; serious/major crime investigation, etc)
- Specialist (e.g. Roads Policing)
- Independent public Access/Enquiry Point
- Multi-service joint provision building – e.g., one-stop-shop

2.11.3 While the most visible form of Police infrastructure at a local level is the neighbourhood Police office or station/shop, there are other support and associated functions that are affected by planning-related growth, and that will require expanded or new facilities to offset that impact. These may be located either elsewhere within the Local Planning Authority area or in some cases elsewhere within the Force area.

2.12 New Developments

2.12.1 Kent Police will seek formula-based contributions from developers in relation to their development schemes within the Dover District Council area in accordance with the below:

COST BY UNIT TYPE

COST BY UNIT TYPE		Residential Cost	£290
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	

2.12.2 This approach has been adopted to ensure there is transparency and consistency in the calculation of contributions, with the objective of increasing accountability, speed and certainty attached to the process. The approach follows that advocated in the DCLG Planning Obligations Guidance (July 2006).

2.12.3 The calculation of contributions follows a formula-based approach (please see Appendix A for a description of the methodology used) and applies a cost per new dwelling (based on a cost per person) and unit of business floor space to all developments. The nature of planning for new policing infrastructure is such that it is not appropriate to apply a threshold to developments above which a contribution will be required. The methodology proposes that any increase in population within a policing area will have an impact on the ability of the Police Force to deliver efficient and effective policing service; accordingly it is appropriate to require a proportionate contribution from each new unit of accommodation that has an impact on the delivery of the service. New population arising from a new development will give rise to greater incidence of crime and disorder as a proportion of the population are likely to commit crimes/disorder and be the target of crime/disorder. Accordingly it is appropriate to pool contributions towards local and force-wide police services.

Contributions towards policing satisfy the five tests of Circular 05/05 as follows:

2.13 Relevant to Planning

2.13.1 On the basis that an increase in population arising from the development proposals would impact negatively on the ability of the police to deliver an effective and efficient service, the request for contributions towards police infrastructure provision to mitigate the impact of the proposed development is relevant to planning.

2.14 Necessary to make the proposed development acceptable in planning terms:

2.14.1 The delivery of safe, healthy and attractive places to live is fundamental to planning for sustainable development. Contributions to essential police infrastructure are required to ensure that an adequate level of police service is available to achieve sustainable communities and to bring development in line with the sustainable development objectives articulated through local, previous regional and national planning policies. If contributions commensurate with population growth were not made the fear of and incidence of crime would rise contrary to established policy with consequent detriment to the community.

2.15 Directly related to the proposed development:

2.15.1 The scale of police resources sought is commensurate with the scale of the population to be served, in order to maintain an adequate level of service and enable the police to deliver on its duty to address crime and disorder issues. New development inevitably creates targets for crime which requires a police presence to reduce the perception of crime and respond effectively to incidents of crime/disorder.

2.16 Fairly and reasonably related in scale and kind to the proposed development:

2.16.1 The methodology for seeking contributions is constructed to ensure that payments are directly related in scale to impact arising from the proposed development in terms of new resident/working population accommodated by the scheme. The formula-based approach anticipates that there would not necessarily be a direct relationship between population growth and housing growth based on current household size. Accordingly it includes a discount factor to ensure that there is proportionality between new population and new dwellings.

2.17 Reasonable in all other aspects:

2.17.1 The financial contributions sought are not intended to resolve existing deficiencies in police infrastructure provision, nor is it seeking to provide a higher level of service.

2.18 The CIL Regulations 2010

2.18.1 The Community Infrastructure Levy Regulations 2010 states it will be unlawful for a planning obligation to be taken into account when determining a planning application for a development, or any part of a development, that is capable of being charged CIL, whether there is a local CIL in operation or not, if the obligation does not meet all of the following tests:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonably related to the scale and kind to the development.

2.18.2 This, in essence, does no more than to remove two of the tests under Circular 05/05. Contributions towards policing satisfy the three tests as detailed above.

3. Background

- 3.1 Kent Police, and other emergency services, are responsible for delivering services that address community safety. Crime reduction and tackling fear of crime are key issues at all levels of society and government. Addressing community safety, whether from crime or in its widest sense, is seen as a crucial aspect of achieving sustainable communities.
- 3.2 It is high on the list of local quality of life indicators provided by the Audit Commission (Local Quality of Life Indicators – Supporting Local Communities to Become Sustainable, Public Sector National Report, AC August 2005); for use in monitoring local sustainable community strategies, Local Development Frameworks (LDF) and Local Area Agreements (LAAs). It is also recognised in DCLG’s white paper: ‘Strong & Prosperous Communities’ (Oct 2006) Vol 2 para A1, where Government’s stated ambition is to put community safety “at the heart of the place shaping role of local authorities”- reflecting the high priority (often the highest) that local communities place on it. ‘Safer Places – The Planning System and Crime Prevention’ (ODPM/Home Office, 2004), a companion document to PPS 1 & PPS 3 and its supplement ‘Safer Places: A Counter Terrorism Supplement’ again emphasizes the importance of safety and crime as a key consideration in the planning process.
- 3.3 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:
- 3.4 *"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,*

- a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and*
- b) the misuse of drugs, alcohol and other substances in its area.”*

This duty extends to spatial planning and “place shaping”.

- 3.5 Planning Authorities should therefore facilitate the objectives of other legislation where land use considerations arise. Any omission or under-emphasis of community safety throughout LDF documents, development control functions and creation of local infrastructure strategies 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).
- 3.6 If growth takes place without fully taking account of community safety requirements, and unless the appropriate policy statements are in local documents to try and prevent this, Local Authorities are putting at risk their Council’s high-level objective of creating sustainable and safe communities. Unless Kent Police can seek appropriate infrastructure contributions as part of developer funded planning obligations, it cannot guarantee maintaining the same level of policing as growth takes place.
- 3.7 Inevitably growth will generate additional pressure on the Police service, with more incidents as population and general growth occurs. Unless funds are secured to provide a level of infrastructure and resourcing commensurate with that growth, the service provided will suffer and key policy objectives at the national and local level, and local expectations, will not be met.
- 3.8 There should not be an assumption by local authorities that Police infrastructure will be provided outside the planning framework. Capital funding from Government and other sources is simply not available to us. Funding new Police infrastructure through developer contributions is therefore key to future

fulfilment of our statutory obligation to provide an effective Police service. Other emergency services are in a similar position.

3.9 Ultimately key LDF documents will be tasked with delivering an agenda for growth, and will have to pass PPS12 Soundness Tests before adoption. Unless there is adequate recognition and reflection of community safety there is a risk that several tests may not be met. If they are found to be unsound, this will lead to delay.

3.10 Kent Police would like to see the following within LDF documents:

1. Full recognition of community safety,
2. High level policies and supporting statements that cover the principles of designing out crime and the need for infrastructure requirements
3. Identification of the emergency services as a key public service provider within definitions of "infrastructure".
4. A stated commitment to pro-actively engage with the Police and other emergency services in all relevant planning areas.

3.11 We would be happy to work with local authorities to establish how we can enhance existing contacts. This may take the form of attendance at regular Authority planning liaison meetings, training seminars, self-help measures, presentations etc.

4. SPECIFIC DOCUMENTS

4.1 Statements of Community Involvement

- 4.1.1 Details of consultees for Local Development Documents should always include the following in the list of non-statutory consultees (as recommended in Annex E of PPS12):

Kent Police Estates Manager - to ensure that provision of any additional infrastructure required, and appropriate references to designing out crime, to ensure public safety are promoted and achieved.

PPS 12 endorses this approach and emphasises the importance of involving infrastructure providers early in the LDF process so that they can "*influence the pattern of new development*" (para B4, Annex B PPS12).

- 4.1.2 Details of consultees for major planning applications should always include the following in the list of non-statutory consultees:

Police Architectural Liaison Officers/Crime Prevention Design Advisers - to ensure that Design & Access Statements adequately identify the impact of a development on community safety and include appropriate mitigation measures.

- 4.1.3 It is important that Kent Police is consulted as early as possible in the planning process (whether it is in preparing Development Plan Documents (DPDs) or in producing development briefs and managing planning applications). This will help to achieve the objectives of planning for sustainable communities by creating "*safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion*" (PPS1 para 36). Where possible, consultation on planning applications should be at the pre-application stage, particularly for major applications or development likely to have significant involvement of the Police during the subsequent planning application, post application, construction or operational phases.

4.1.4 The Housing Green Paper 'Homes for the Future' endorses this approach, confirming that the Government wants "*to see local authorities engaging the Police and Police authorities at the earliest opportunity to ensure that safety and security are an integral part of the planning process.*" (Homes for the Future, Ch. 12).

4.2 Core Strategy

4.2.1 If the Local Authority chooses to include a 'Portrait' of the area covered by the Core Strategy setting out the broad, baseline characteristics of the area (population, employment and other statistical data), it should include basic details on crime and fear of crime statistics for the area as well (as recommended in 'Policies for Spatial Plans' section 4.3 – Planning Officers Society, 2005). The Portrait need not only focus on the 'negative' aspects of crime and fear and crime data. This part of the Core Strategy provides an important opportunity to refer to positive data as well. Kent Police considers that a clear reference to the number of homes and other developments achieving the Secured by Design award would be a very helpful indicator in both this part of the Strategy as well as in the Sustainability Appraisal of the Strategy.

4.2.2 Where the Portrait and other sources of information such as the Sustainable Community Strategy reveal specific 'Issues' relevant to the local authority's area such as crime, the fear of crime and lack of physical infrastructure and resources to support the policing role in the authority's area, it will be important to identify 'drivers of change' to help redress these issues. These 'drivers' could include reducing crime and the fear of crime, and ensuring that there are sufficient infrastructure / resources available when and where they are required.

4.2.3 In the 'Vision' section the Core Strategy should refer to the wider vision of the authority's Sustainable Community Strategy (SCS) and Community Safety Strategy (see checklist 8a – '*Creating Local Development Frameworks - a Companion Guide to PPS12*'), and acknowledge that the LDF should deliver,

as clearly required by para 1.10 of PPS12, the key components of the SCS, which always include community safety, within the LDF.

Reference should be made to the Government's objectives for the planning system as set out in PPS1 which include: *"ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community."*(para 5, PPS1).

An additional reference indicating that *"all those living and working within the local authority's area will be able to rely upon and have access to properly resourced social and community infrastructure (including the emergency services)."* should also be incorporated.

4.2.4 Allied to the 'Vision' will be the 'Strategic Objectives'. These should explain in more detail how the 'Vision' will be delivered. Where necessary, Kent Police will encourage the inclusion of the following references within the Strategic Objectives to ensure a sound basis for the Core Strategy policies:

- Reference to designing out crime by adopting Secured by Design (SBD) award principles for all new development, both for properties and external areas (to be measured by reference to the number of schemes achieving the SBD award);
- A stated commitment to engage with the Police and other emergency services in relevant planning areas;
- Infrastructure for the emergency services in definitions of community or social infrastructure. The emergency services should be identified as key public service providers in this context ;
- A commitment to use planning obligations to seek funding for emergency services infrastructure;
- A commitment to promote safe and healthy communities and to deliver community safety.

4.2.5 Following on from the 'Strategic Objectives' the 'Spatial Strategy' should clearly define the spatial requirements and what will occur in each locality or

in response to each 'Issue'. Consideration needs to be given to the existence, and capacity, of existing and any required infrastructure when considering allocations, and a commitment to early engagement with key public service providers, including the emergency services, should be given.

In accordance with paragraph 2.10 of PPS12 the strategy should: "*set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development.*"

While recognising the differing roles of the Community Strategy and LDF Core Strategy, the spatial strategy needs to be closely matched with the former. In doing so, the Core Strategy can reflect the priorities of key service providers, such as the emergency services, and provide the spatial policies to help facilitate their various requirements.

This would provide assurance to the public that community safety will be given due consideration and help control or reduce fear of crime. A lack of suitable infrastructure, or the non-viability of its provision, may also influence the direction of and extent of growth elsewhere.

Housing and economic growth cannot occur without commensurate growth in community infrastructure, including infrastructure associated with the emergency services. The 'Spatial Strategy' must refer to the means by which the planning authority anticipate this infrastructure being provided, where necessary cross-referring to the planning obligations Supplementary Planning Document (SPD). This should be informed by early discussions with Kent Police and the other emergency services to ensure that the process is properly planned.

It may also be appropriate to define a specific community safety and social cohesion strategy.

An acknowledgement of the Authorities duty under S17 Crime & Disorder Act 1998 would be helpful, to reinforce the need to reflect community safety throughout LDFs.

- 4.2.6 Access to services is a key issue often included in Community Strategies. It would be helpful to see wording along the following lines:

The Council will work with key local service providers to facilitate their land and building requirements through the identification of mixed use or other development opportunities in the Site Allocations DPD. The Council will also require new development to contribute to the Community Strategy with the aim of ensuring fair access to services provided through key community facilities and the wider goal of creating a safer more sustainable environment. New development will be assessed against its impact on existing local infrastructure, services and resources, and where necessary, new provision should be made as part of the development in order to meet or fund any infrastructure impact.

- 4.2.7 Kent Police Authority would like to see a specific policy on planning obligations, or at least an expansion of the current relevant policy, that clearly spells out the expectation that development generates pressures and should come with associated infrastructure. As a result, applications for planning permission should consider obligations as business as usual.

Suggested wording would be as follows:

Development tends to place new demands on local infrastructure and services.

Development should not be an unreasonable burden on existing infrastructure, and it is therefore essential that development should not take place such as to enable an increase in population and the demand on services until the infrastructure needed to support it is available.

Planning permission will only be given for developments where the necessary infrastructure, services, facilities and amenities to support them are in place

or will be provided when needed. The provision of infrastructure should derive from the development, whether physically provided on site by the developer, off site or through financial contributions by use of a s106 Agreement. It is expected that contributions would reflect the need for new infrastructure to mitigate the impact of the new development. As there may be a cumulative impact locally or an impact on some services delivered from a different location but that relate to the development, contributions for off site provision may be pooled.

The Council will continue to work to ensure that appropriate infrastructure is provided to match the needs of the proposed development. Circular 05/2005, the draft RSS and other government documents such as "Streamlining LDFs" all contain guidance on the appropriateness and methods of achieving developer contributions. This is further envisaged in the guidance to be published on the Community Infrastructure Levy (CIL), which will be a critical tool in delivering Police infrastructure.

- 4.2.8 Core Strategies often contain a policy covering safe design. 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 and CCTV are themselves useful but insufficient to tackle crime and fear of crime, and community safety comprehensively. This is often overlooked by planning authorities.

There is an expectation that Secured By Design award scheme standards for new buildings and SBD principles for external areas/public realm design will be adopted by developers/owners on all planning applications. Experience suggests that this is not always the case. The effectiveness of this policy should be monitored annually in conjunction with Kent Police to establish the number of schemes achieving the SBD award.

Policies within the Core Strategy relating to developing Sustainable Communities and high quality, well designed places, would be the appropriate locations to incorporate policies relating to Secured By Design principles. While requests for dedicated policies on creating safer communities can be

made it is likely that such principles would be incorporated within more generic neighbourhood creation and design focused policies. The following wording is suggested:

Designing out opportunities for crime and anti-social behaviour in accordance with best practice as highlighted within 'Safe Places' and 'Secured By Design'. Working with partners in the Community Safety Partnership/Crime and Disorder Reduction Partnerships on initiatives to reduce crime and anti-social behaviour.

This wording would be suitable for a stand-alone policy or could be adapted to support more generic policies (referred to above).

A design policy should robustly emphasize the need for developers to demonstrate how their developments are addressing community safety/crime prevention in Design and Access Statements. This is a requirement of Circular 1/2006 and Safer Places – the Planning System and Crime Prevention (ODPM). Recently revised CABE guidance on these Statements has placed greater emphasis on this point.

Reference to the Secured By Design & Safer Parking websites would also be useful:

www.securedbydesign.com

www.saferparking.com

- 4.2.9 Core Strategies usually contain a policy on town centres. In addition to statements and policies looking to strengthen town centres and their evening/night time economy, we would like to see a policy promoting a safer and attractive evening/night time economy. A suggested policy could be along the following lines:

The Council wishes to promote a range of uses in town centres which result in a balanced and safe evening/night time economy The quantity, type and

location of A3, A4, A5 and other evening or late night uses will be controlled, having regard to other spatial planning documents and policies, together with the aims and objectives of the Community Strategy and also the Community Safety Strategy produced by the Crime & Disorder Reduction Partnership.

Where new A3, A4 and A5 uses are permitted, financial contributions will be sought for related town centre improvements including additional CCTV, improved lighting, improved signage for CCTV and Alcohol Free Zones, and any necessary additional infrastructure identified by the relevant agencies. In relation to those areas where concentrations of drinking establishments, night clubs or other evening or late night uses have caused existing anti-social problems, there will be a presumption against further consents for such uses.

Further town centre comments are in the next section, paragraph (d).

4.3 Site Allocations Documents

4.3.1 Whether Core Strategies and Site Allocation Documents deal with the detail of each allocation site or delegate that responsibility to Area Action Plans and Supplementary Planning Documents, it is critical that a number of issues are dealt with 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 also like to encourage the local authority to commit to early engagement with Kent Police on, and monitoring of, the delivery of community safety infrastructure and the involvement of the emergency services on development sites.

- Appropriate land should be allocated for new or, where necessary, expanded Police facilities, where required to serve areas of significant growth within the local authority's area. There should be a presumption that planning permission will be granted for growth related development.

4.3.2 Phasing - Early provision of key infrastructure is paramount in any growth, whether phased or not. It is critical that new or enhanced Police facilities are provided early on. Local Police need to be able to build relationships with expanded or new communities from the outset, and to react to the need for Police services, demand for which will typically commence as soon as growth starts.

A commitment to work closely with the Police and other infrastructure providers in planning the timing of their infrastructure needs should be set out.

4.3.3 Large Scale Development Sites – Typically these will require new and enhanced Police facilities, both to address local neighbourhood policing needs and also to meet the associated support facilities arising from the growth. It is important that the policies for all large-scale development sites refer to additional community infrastructure or the funding to deliver new infrastructure (to serve both the Police and the other emergency services) being secured through planning obligations.

It is critical that the local authority works with key infrastructure providers to ensure adequate provision of necessary infrastructure is built into the master planning of large-scale development sites. This may require specific sites to be identified for new or expanded Police facilities. In terms of local policing needs the Police are supportive of the principle of co-location with other appropriate public service or voluntary sector providers in a community building. In some locations it may be appropriate to have a one-stop-shop type of presence. In all cases the Police would expect such facilities to be provided through planning obligations.

A specific statement referring to designing out crime through the adoption of Secured by Design principles for layout and external areas, and Secured by Design standards for properties in the master planning of such sites should be incorporated. It may also be appropriate to include a specific policy requirement to this effect.

A specific statement could be incorporated in the document referring to the overarching objective – the creation of safer and stronger communities.

- 4.3.4 Town Centre Allocations – Any increased density and amount of development, expansion of retail and leisure facilities and issues such as promoting the 24 hour economy, will impact on Police resources. This needs to be recognised in the allocation policies.

In infrastructure terms, a more visible and accessible presence for the Police in town centres, together with other measures such as enhanced CCTV, may be required. The office space needed may take the form of part of a major retail scheme or public service offices, or a “one stop shop” facility shared with other public or voluntary sector service providers.

The Document must therefore state that new development should allow for either appropriate space and/or a financial contribution to be made available for space, to be secured via a planning obligation. In either case a specific space allocation needs to be identified as part of the planning process.

Designing out crime is a critical issue in town centres and must also be addressed in policy for these allocations.

Community safety, crime and the fear of crime are important issues associated with town centres. The document should include wording in a policy that states: *"issues such as community safety are extremely important to ensure the town centre can remain a vital, vibrant and safe environment. Designing out crime in both buildings and the public realm will be pursued, as will provision of appropriate community safety infrastructure, including new*

or expanded Police facilities, through the use of planning obligations/Community Infrastructure Levy.”

- 4.3.5 Smaller Urban Area Allocations - The expansion of existing communities through incremental growth will impact on Police resources, potentially significantly changing their character and community safety resource requirements. It is important to recognise this and to ensure that sites contribute towards any enhanced facilities required.

Policy wording should be included which states: *“incremental growth of existing communities will place pressure on local infrastructure and services. Planning obligations will be expected to meet any such impact.”*

Policy wording should also refer to the need to design out crime through adoption of Secured by Design principles, and to the overarching objective of creating safer and stronger communities.

- 4.3.6 Employment Allocations - The Police consider that such allocations place additional demands on resources. The relevant policies should therefore refer to designing out crime measures, and to contributions from non-residential development being sought via planning obligations in order to provide any necessary additional infrastructure.

4.4 Area Action Plans

- 4.4.1 Reflecting the Authorities duty under S.17 Crime & Disorder Act 1998, the consideration of community safety and crime and other behaviour reduction through both design and infrastructure led approaches, will be both necessary and critical. It will be important to identify key indicators against which to assess the policies in the Area Action Plan (AAP). Regular review and monitoring of targets will help highlight under-performance.
- 4.4.2 It is essential that the AAP addresses the same issues within the Action Area as that contained in the Core Strategy, but at a more detailed level.

Thus it should include basic details on crime and fear of crime statistics for the Action Area (echoing the 'Portrait') and it should identify specific 'Issues' relevant to the Action Area such as crime, the fear of crime and the need for physical infrastructure and resources to support the policing role in the Action Area. It should pick up on the wider 'Vision' of the Authority's Sustainable Community Strategy and Community Safety Strategy in relation to the specific Area covered by the Plan, and it should explain, through a set of core 'Objectives', how the 'Vision' for the Action Area will be delivered. Finally the 'Strategy' itself must detail the spatial requirements and what will occur in the Action Area or in response to each 'Issue' identified. This may include consideration of the existence, and capacity, of existing and any required infrastructure in the Action Area, and a commitment to early engagement with key public service providers including the emergency services should be given.

The AAP should ensure, through the introduction of specific policy requirements, that the potential for crime is designed out as far as possible through the application of Secured By Design (SBD) award principles (layout and external areas) and standards (properties). It would be preferable to have SBD compliance specifically demonstrated in Design & Access Statements, however there is also the opportunity, within the AAP, to introduce a design code. Any code should have clear reference to SBD and refer to the Code for Sustainable Homes setting a minimum standard of 4 stars that must include crime prevention elements. There is national evidence (e.g. ABI report "*Securing the Nation*" July 2006) that new development built to SBD does reduce some crimes significantly. Monitoring of the achievement of this is a very important step towards improving the quality of design overall.

- 4.2.3 The Police are a key local service (community safety) provider. PPS1 (para 23 viii), and the recent Green Paper (Homes For the Future) highlight the need for any necessary infrastructure to be provided with any new development. The AAP should therefore highlight this key issue and recognise that a broader definition of infrastructure, to include community safety (identified in PPS1 and as a key priority in Community Strategies) is

appropriate if new development is to be truly safe and sustainable. That should include provision for the emergency services. The Police have no funding provision for capital projects, and must therefore rely on the planning obligation process to secure new infrastructure. This should be explicitly recognised in policy in the AAP.

4.2.4 Any significant new development brings with it additional resource for example, in a local neighbourhood policing capacity, and, with additional traffic generation, on road-related incidents. In order to ensure the Police can effectively maintain the current level of policing, the Action Plan should review the following:

- The need for additional local neighbourhood policing facilities and possibly adaptations/extensions to other local or support facilities
- The need to take on additional officers and staff; and
- The need to introduce infrastructure such as Automatic Number Plate Recognition (ANPR) systems, CCTV etc, Airwave radio masts, mobile data provision.

4.2.5 Police involvement will vary from Area to Area however the issues highlighted above will be central to all types of AAP, irrespective of the specific Area covered. Greater emphasis may need to be paid to crime reduction measures and designing out crime in particular locations such as town centres. However the Local Authority should not assume, simply because the area covered by an AAP is not traditionally an area where the Police have been involved in planning matters, that a similar approach would still be appropriate. Referring to the obligations contained in S17 of the Crime and Disorder Act 1998, the local authority will "*need to do all that it reasonably can to prevent, crime and disorder in its area*".

4.3 Generic Development Control Policies

4.3.1 General DPD policies can be a very effective tool in supporting the functions of the Police authority. Therefore where not already included elsewhere in DPDs, policies specifically addressing the following matters should be incorporated:

4.3.2 Designing out crime by adoption of the Secured by Design award scheme principles. Such policies might include wording such as:

a) *"The Council will require all Design and Access Statements submitted by developers in support of all new development proposals to demonstrate how the proposed designs and layouts will deter crime, fear of crime and antisocial behaviour by reference to the Guidelines set out in this document.*

b) *Where appropriate, the Council will require developers to show that they have taken into account the existing local context in terms of:*

- o *current levels of crime and antisocial behaviour in the area*
- o *perceptions of crime and urban environmental quality amongst the local community*
- o *activity levels in streets and public spaces at all times of day and night*
- o *the extent of natural surveillance of properties, streets and public spaces*
- o *the creation of defensible spaces with clear definition and protection of spaces through use and ownership."*

(L.B. Sutton 'Designing Out Crime' guideline DCR2).

It would be preferable to agree a protocol between the Police (and other emergency services where applicable) and other Local Planning Authorities, to ensure that the principles of designing out crime, whether incorporated in generic policies or specific SPDs are fully considered in the planning process. Such a protocol would establish agreed criteria for a formal working relationship.

4.3.3 The use of planning obligations to secure funding for, or to secure the provision of, community infrastructure, to include Police and emergency service infrastructure specifically. Again the wording should adopt a similar approach to the following:

"Where development proposals will result in additional demands being placed upon Police and emergency services' infrastructure the planning authority will seek the provision, or funding, of additional infrastructure to meet the extra burden placed upon those services, through the use of planning obligations. The scale of any obligations will be commensurate with the scale of the development proposed and the impact on those key services."

4.3.4 Timely provision of infrastructure required to serve development:

"In determining planning applications the planning authority will liaise with the relevant service and community infrastructure providers to ensure that any additional infrastructure required to serve the new development is provided in a timely manner."

4.3.5 Highway safety in the design and layout of development:

"The planning authority will consult with the highway authority and, where appropriate, the Police Authority and other emergency services in order to ensure that the design of road layouts for new developments are acceptable in highway safety and accessibility terms."

While emphasis is often placed on the layout of new developments, there is the need to ensure that the wider road network serving it is able to facilitate the necessary access by the emergency services.

4.4 Supplementary Planning Documents

4.4.1 As well as producing clear guidance documents dealing with planning obligations and design, both of which are critical to crime prevention and addressing the fear of crime, the Police wish to be consulted on, and pro-actively engaged in, all other SPDs to ensure that the key issues of designing out crime *and* provision of social/community infrastructure (including essential infrastructure for the Police) are fully addressed in the text of those documents. This may include any SPDs dealing with planning obligations and the proposed Community Infrastructure Levy.

Design and the provision of infrastructure will be essential elements of most supplementary planning documents, and the recognition of the role of the emergency services should be fully considered at all stages of the process and reflected clearly in documents. The Police should be clearly identified as a key public service provider with its own infrastructure requirements, and legitimately included in definitions of “community” or “social” infrastructure. The monitoring of SBD awards and the delivery of community safety infrastructure will be important tools in assessing the effectiveness of SPDs and other LDF documents and policies.

- 4.4.2 An SPD on the issue of the needs of the District in respect of housing mix and tenure type would benefit from addressing the community safety impact of population numbers, demographics, mix of tenures, and tenant placement policies. This will ensure an appropriate mix of housing, tenure type (private, rented, shared ownership) and occupant (e.g. no over-emphasis on re-housing prolific offenders or vulnerable people in crime hotspot areas) with the aim of ensuring crime profiles of neighbourhoods or settlements are not adversely affected. Opportunities for spatial planners to re-engineer crime hotspot areas through housing policies and mix would be beneficial.

5. Sustainability Appraisal

- 5.1 Early consultation with the Police and other emergency service providers will be critical to establishing the issues that require further consideration in the Sustainability Appraisal (SA), as recommended in para 3.2.11 of ODPM document "*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*".
- 5.2 The document goes on to refer to crime, crime reduction and patterns of criminality statistics as an essential baseline source of data to assess quality of life and against which to assess the vision, spatial strategy, policies, plans and other elements of Local Development Frameworks. The incorporation of data on the number of developments achieving SBD awards will also be an important addition to the evidence base against which to assess the LDF, as will statistics on the delivery of additional Police facilities / infrastructure. These indicators should be verified through the 'Developer Contributions Team' at Police HQ, Maidstone (cil@kent.pnn.police.uk)
- 5.3 Tools for mitigating the adverse effects and maximising the benefits of the DPD will need to include designing out crime through adoption of Secured by Design award scheme objectives, and other community safety measures. Reference will also need to be made to the provision of new or improved community infrastructure to meet the additional demands arising from additional economic, commercial, housing and other development.
- 5.4 In all cases the SA should assess the effectiveness of the relevant document in delivering the key objectives of:
- Securing community safety
 - Designing out crime
 - Providing for additional infrastructure where/when it is needed

- Clearly identifying the emergency services as a key public service provider within definitions of “infrastructure”
- Pro-actively engaging with the Police and other emergency services in all relevant planning areas

6. ANNUAL MONITORING REPORT

- 6.1 Regular monitoring of the effectiveness of policies is essential. The Police would wish to see a review of those policies relating to community safety, with appropriate linkage back to relevant over arching strategies such as the Community and Community Safety Strategies.

Part 2



**Kent
Police**

Policing Contributions Initiative

7. Kent Police Policing Contributions Initiative

7.1 Introduction

- 7.1.1 Kent Police has undertaken a review of the policing implications of proposed new developments within Kent and Medway and has commenced a countywide initiative to obtain developer contributions towards setting up of additional policing services that are needed to police new developments. The initiative has been set up in accordance with the national best practice approach developed by Police Forces across the UK under the Association of Chief Police Officers (ACPO). All the following is based upon the assumption that all developments will be subject to a Secure by Design review and full implementations of the findings. If this is not the case then the level of developer contributions Kent Police would seek would be significantly higher than shown, as more resources will be required to ensure no detrimental impact on community safety, crime and disorder.
- 7.1.2 Police forces do not receive central government funding for the capital cost of growth related policing infrastructure. Kent Police's initiative has resulted from concern about the ability to fund additional policing services that will be necessitated in the future by the delivery of new housing and employment development around the County notwithstanding the changes introduced by the new Government.
- 7.1.3 Until now Kent Police has absorbed the cost of providing additional policing services arising from new development. However, with the magnitude of new developments Kent Police has reached a point at which it will be unable to continue to provide the level of front line policing services that is presently provided to the County without additional funding.
- 7.1.4 Kent Police monitors population growth statistics for the County produced by the Office of National Statistics; Kent County Council and Medway Council. In these projections most of the Planning Authority Areas across the County are projected to have substantial growth over the period to 2026.

- 7.1.5 Under the current legal and planning rules, Police Forces can seek developer contributions towards one off capital costs of setting up additional policing services that are necessitated by developments without which the developments would be inappropriate from a planning perspective. Developer contributions towards policing may either be secured through Planning Conditions or through Planning Obligations. Under the existing system it can be expected that in most cases, developer contributions towards policing will be delivered through the use of Planning Obligations.
- 7.1.6 Kent Police interpretation of the rules is that in general it would not be valid to seek developer contributions towards revenue costs of running additional policing services that are set up to meet the demands of new developments. This is because the assumption is that running costs would be met by Government police funding and the Council Tax precept paid by residents of new houses once occupied. However, there is a three year delay in realising additional funding from the Government and, therefore, Kent Police is of the view, supported by Ian Dove QC it is entitled to claim developer contributions in order to bridge this delay.
- 7.1.7 Kent Police is of the view that the types of development that most significantly increase the demand for additional policing services are: large residential developments; an accumulation of small residential developments; and, commercial developments (for example new shopping centres; transport infrastructure/interchange schemes; mixed use schemes; night time economy developments; etc.) all of which have a sufficient impact on policing requirements to warrant developer contributions towards policing services.
- 7.1.8 The DCLG overview (March 2010) of the Community Infrastructure Levy Regulations 2010 provides the following guidance as to what is infrastructure:
- 7.1.9 The Planning Act 2008 provides a wide definition of the infrastructure which can be funded by CIL, including transport, flood defences, schools, hospitals, and other health and social care facilities. This definition allows CIL to be used to fund a very broad range of facilities such as play areas, parks and green spaces, cultural and sports facilities, district heating schemes and

police stations and other community safety facilities. This gives local communities flexibility to choose what infrastructure they need to deliver their development plan’.

- 7.1.10 The approach Kent Police is taking is to quantify the cost of providing additional police services necessitated by new developments that is based on national best practice methodology that is described in full in this document which also includes information on cases from around the UK where developer contributions towards policing have been obtained.

7.2 Relationship Between Development and the Need for Policing

- 7.2.1 There is a direct link between the implementation of a new development and the need for policing services. Both during the construction phase and following completion, new development creates risks and opportunities for crime that need policing. Development of previously undeveloped/greenfield sites results in the greatest change in policing need. Redevelopment of previously developed/brownfield sites typically changes or intensifies pre-existing policing requirement. Policing services are principally provided to people and their communities, rather than to the places/buildings within which people live and work. Therefore residential developments usually, but not exclusively, have the greatest impact on policing requirements.

7.3 Kent Police Structure

- 7.3.1 Kent Police currently operates a six Basic Command Units (BCUs) structure each under the command of a Chief Superintendent who is answerable to the Chief Officer Team. Within each BCU there are the main ‘response units’ as well as a number of specialist teams including Neighbourhood Policing Units, staff having responsibility for policing their designated local neighbourhood. Most policing functions come under one of the following directorates: Area Operations very much dealing with local policing; Operational Support which deals with more serious or specialist policing activity including critical incidents and Frontier Operations; Serious Crime Directorate dealing predominantly with major, serious and organised crime issues; Human Resources/Corporate Communications responsible for overall resource issues, standards of service delivery and corporate communications. Two further

directorates support these: Finance; and, Information Technology both of which are critical to the effective and efficient delivery of policing services.

7.3.2 Neighbourhood Policing Teams are very much at the heart of the Kent Police policing model delivering local policing services within local communities. This is in line with national initiatives supported by ACPO and central Government. Kent Police focus is to have safer communities within Kent working in conjunction with partners and meeting the Governments overall Citizen Focus agenda. This involves the allocation of dedicated resources, intelligence led targeting of issues that matter most to the public and joint action by the police service, partner agencies and public to address community matters.

7.3.3 While the most visible form of police infrastructure at a local level is the Neighbourhood Policing Teams, there are other support and associated functions that will be affected by planning related growth that will require expanded or new facilities to mitigate impacts. Such facilities may be located either elsewhere within the BCU or in some instances elsewhere within the wider Kent Police Force area. As previously stated these will include Forensic Services; Roads Policing; Tactical Operations; Serious & Organised Crime Directorate; Counter Terrorism; Frontier Control; etc. which are centrally based to serve the whole County. However, the functions remain a crucial component of the service delivered by Kent Police that Dover relies upon, and new developments within the Dover District Council administrative area will place a greater demand on those functions, giving rise to the need for additional staff. A proportion of the developer contributions may, therefore, be directed towards functions at the force-wide level.

7.4 Local Policing

7.4.1 Dover sits within the South Kent BCU comprising the administrative areas of Dover District, Ashford Borough and Shepway District Councils.

7.4.2 The Dover District Council area is the part of South East England that is nearest to mainland Europe. The area covers approximately 121 square miles and includes three main towns, Dover, Deal and Sandwich as well as dozens of picturesque villages and hamlets, which make East Kent such an attractive

and popular place to live and visit. The 2001 census found the population to be 104,490.

7.4.3 The main town in the district is Dover - internationally famous for the White Cliffs and the busiest passenger ferry port in the world. Steeped in history, the town has been dubbed "The Gateway to Britain" (whilst also being the Gateway to Europe) and has been the country's frontline since before the Roman invasion. Apart from the port and ferry industries, the main business in the area is tourism, packaging and chemical instruments.

7.4.4 Ten miles to the north of Dover lies the coastal town of Deal which has often been called one of the first Georgian New Towns. It is a mecca for sea anglers and back in the 18th Century was renowned as a centre for smuggling. Deal is home to numerous small businesses and is a popular residential area.

7.4.5 The last of the main towns is Sandwich, described as the best preserved medieval town in the United Kingdom with ancient streets and alleyways, which house an array of antique shops. The enormous Pfizer Pharmaceutical company is based on the outskirts of the town bringing employment to thousands of the area's residents. Sandwich also boasts two excellent golf courses, one of which is Royal St. George's, which regularly hosts the British Open Championships including the 2003 Open in July.

7.4.6 From Dover, ferries and catamarans provide many crossings to France and Belgium every day, depending on the time of year, but in addition to its proximity to Europe, the district has excellent internal road and rail links. The Channel Tunnel terminal at Cheriton is 20 minutes away and the Ashford International Passenger Station for the Eurostar service, half an hour. Gatwick can be reached in 90 minutes and Heathrow in 2 hours. Education is well served with a variety of state and private schools, further educational colleges and the University of Kent at Canterbury a few miles away.

7.4.7 Journey time to London by rail has now been cut to 1 hour with the introduction of the High Speed Rail Link which brings it well within the

commuter travelling band width. The two main strategic roads within the county also merge at Dover Eastern Docks– the A2 and the A20 linking it to the national motorway network

7.4.8 Set out below is the latest published police data (all crime) for Dover District Council area by Ward, April to July 2010 v April to July 2009:

Dover District - Wards

All crime

Crime Category	Financial year				
	April to August 2010				
	This Year	Last year	% change	No. change	Per 1000 pop
Aylesham Ward	106	123	-13.8%	-17	22.2
Buckland Ward	198	134	47.8%	64	27.4
Capel-le-Ferne Ward	38	40	-5.0%	-2	16.4
Castle Ward	193	225	-14.2%	-32	95.2
Eastry Ward	100	64	56.3%	36	19.3
Eythorne and Shepherdswell Ward	131	115	13.9%	16	28.6
Little Stour and Ashstone Ward	103	104	-1.0%	-1	15.0
Lydden and Temple Ewell Ward	54	19	184.2%	35	23.5
Maxton, Elms Vale and Priory Ward	255	181	40.9%	74	36.3
Middle Deal and Sholden Ward	159	141	12.8%	18	21.5
Mill Hill Ward	115	77	49.4%	38	15.2
North Deal Ward	198	214	-7.5%	-16	28.5
Ringwould Ward	41	39	5.1%	2	21.1
River Ward	74	46	60.9%	28	16.6
Sandwich Ward	156	136	14.7%	20	22.7
St. Margaret's-at-Cliffe Ward	60	81	-25.9%	-21	10.8
St. Radigunds Ward	189	213	-11.3%	-24	38.6
Tower Hamlets Ward	226	266	-15.0%	-40	43.7
Town and Pier Ward	82	50	64.0%	32	38.7
Walmer Ward	86	112	-23.2%	-26	11.9
Whitfield Ward	117	122	-4.1%	-5	26.2
Miscellaneous	65	76	-14.5%	-11	n/a
Dover Total	2746	2578	6.5%	168	25.7

The following gives current published crime data for the whole Dover District Council area on a Financial and Rolling year basis as indicated:

Dover - Crime summary

All crime

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	2746	2578	6.5%	168	6161	6435	-4.3%	-274
SDs	794	921	-13.8%	-127	1791	2307	-22.4%	-516
SD rate	28.9%	35.7%	-6.8		29.1%	35.9%	-6.8	

Burglary dwelling

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	87	90	-3.3%	-3	208	213	-2.3%	-5
SDs	17	16	6.3%	1	37	41	-9.8%	-4
SD rate	19.5%	17.8%	1.7		17.8%	19.2%	-1.4	

Burglary other than dwelling

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	179	183	-2.2%	-4	392	427	-8.2%	-35
SDs	15	26	-42.3%	-11	27	57	-52.6%	-30
SD rate	8.4%	14.2%	-5.8		6.9%	13.3%	-6.4	

Vehicle crime

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	219	225	-2.7%	-6	558	569	-1.9%	-11
SDs	31	33	-6.1%	-2	62	73	-15.1%	-11
SD rate	14.2%	14.7%	-0.5		11.1%	12.8%	-1.7	

Theft of motor vehicle

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	73	76	-3.9%	-3	181	216	-16.2%	-35
SDs	19	16	18.8%	3	40	38	5.3%	2
SD rate	26.0%	21.1%	4.9		22.1%	17.6%	4.5	

Theft from motor vehicle

Financial year				Rolling year			
April 2010 to August 2010				September 2009 to August			

					2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	146	149	-2.0%	-3	377	353	6.8%	24
SDs	12	17	-29.4%	-5	22	35	-37.1%	-13
SD rate	8.2%	11.4%	-3.2		5.8%	9.9%	-4.1	

Offences against vehicles

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	257	259	-0.8%	-2	634	686	-7.6%	-52
SDs	32	48	-33.3%	-16	67	93	-28.0%	-26
SD rate	12.5%	18.5%	-6.0		10.6%	13.6%	-3.0	

Violent crime

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	651	600	8.5%	51	1436	1536	-6.5%	-100
SDs	294	324	-9.3%	-30	671	860	-22.0%	-189
SD rate	45.2%	54.0%	-8.8		46.7%	56.0%	-9.3	

Violence against the person

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	573	556	3.1%	17	1273	1426	-10.7%	-153
SDs	264	300	-12.0%	-36	617	805	-23.4%	-188
SD rate	46.1%	54.0%	-7.9		48.5%	56.5%	-8.0	

Sexual offences

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	57	26	119.2%	31	117	73	60.3%	44
SDs	24	17	41.2%	7	40	40	0.0%	0
SD rate	42.1%	65.4%	-23.3		34.2%	54.8%	-20.6	

Robbery

Financial year	Rolling year
April 2010 to August 2010	September 2009 to August 2010

	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	21	18	16.7%	3	46	37	24.3%	9
SDs	6	7	-14.3%	-1	14	15	-6.7%	-1
SD rate	28.6%	38.9%	-10.3		30.4%	40.5%	-10.1	

Assaults with less serious injury

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	294	318	-7.5%	-24	644	708	-9.0%	-64
SDs	128	141	-9.2%	-13	295	351	-16.0%	-56
SD rate	43.5%	44.3%	-0.8		45.8%	49.6%	-3.8	

Serious violent crime

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	11	15	-26.7%	-4	31	46	-32.6%	-15
SDs	5	12	-58.3%	-7	12	33	-63.6%	-21
SD rate	45.5%	80.0%	-34.5		38.7%	71.7%	-33.0	

Racially or religiously aggravated crimes

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	16	12	33.3%	4	32	n/a	n/a	n/a
SDs	13	7	85.7%	6	21	n/a	n/a	n/a
SD rate	81.3%	58.3%	23.0		65.6%	n/a	n/a	

Criminal damage

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	703	658	6.8%	45	1704	1699	0.3%	5
SDs	102	138	-26.1%	-36	270	353	-23.5%	-83
SD rate	14.5%	21.0%	-6.5		15.8%	20.8%	-5.0	

Serious acquisitive crimes

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change

Recorded	327	333	-1.8%	-6	812	819	-0.9%	-7
SDs	54	56	-3.6%	-2	113	130	-13.1%	-17
SD rate	16.5%	16.8%	-0.3		13.9%	15.9%	-2.0	

Theft and handling (including vehicle interference)

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	691	630	9.7%	61	1414	1462	-3.3%	-48
SDs	161	223	-27.8%	-62	385	502	-23.3%	-117
SD rate	23.3%	35.4%	-12.1		27.2%	34.3%	-7.1	

Theft and handling (excluding vehicle interference)

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	653	596	9.6%	57	1338	1345	-0.5%	-7
SDs	160	208	-23.1%	-48	380	482	-21.2%	-102
SD rate	24.5%	34.9%	-10.4		28.4%	35.8%	-7.4	

Fraud and forgery

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	95	80	18.8%	15	188	223	-15.7%	-35
SDs	50	51	-2.0%	-1	98	138	-29.0%	-40
SD rate	52.6%	63.8%	-11.2		52.1%	61.9%	-9.8	

Drug offences

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	78	73	6.8%	5	169	190	-11.1%	-21
SDs	82	74	10.8%	8	163	185	-11.9%	-22
SD rate	105.1%	101.4%	3.7		96.4%	97.4%	-1.0	

Other offences

	Financial year				Rolling year			
	April 2010 to August 2010				September 2009 to August 2010			
	This year	Last year	% change	No. change	This year	Last year	% change	No. change
Recorded	43	39	10.3%	4	92	116	-20.7%	-24
SDs	42	36	16.7%	6	78	98	-20.4%	-20

SD rate	97.7%	92.3%	5.4		84.8%	84.5%	0.3	
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SD = Sanctioned Detections

SD rate = Sanctioned Detection Rate

7.4.6 This data clearly demonstrates the efforts employed by Kent Police in relation to crime reduction and detection which it is keen to be able to maintain. However this can only be achieved through developer contributions contributing to the changes required to infrastructure resulting from development, thus enabling the continued delivery of an effective and efficient police service.

7.5 Additional Policing Requirements for any new Proposed Development

7.5.1 The Chief Officer Team of Kent Police with the Senior Management Team of the South Kent BCU will undertake a review of the operational requirements for any new proposed development to determine any additional policing services that will be required to support local communities and engagement with victims, witnesses and offenders of crime. This will include the potential need for any additional infrastructure and equipment (cycles; other vehicles; IT; etc.). Kent Police will seek to engage with the Crime and Disorder Partnership to develop local initiatives to reduce local crime.

7.5.2 Crime, disorder and community safety are major concerns for the public and police officers spend many hours of their time dealing with incidents involving young people. When this community group congregate on street corners or outside shops their actions raise the fear of crime felt by some other members of the community.

7.5.3 As previously stated, the above requirements assume that a detailed design of any new development will incorporate appropriate Secure by Design (SBD) measures. The statement below is from the ACPO – Crime Prevention Initiative 2004:

7.5.4 *'One of the Government's key objectives for the planning of new housing is to secure high quality sustainable places where people choose to live. To achieve this the Government recognises that much greater emphasis needs to*

be placed on the quality of design and planning. Designing for community safety is a central part of this, and the core principles apply not only to residential but also to other forms of development.

- i. Secured by Design is a police initiative to encourage the building industry to adopt crime prevention measures in the design of developments to assist in reducing the opportunity for crime, creating a safer and more secure environment. Secured by Design is owned by the Association of Chief Police Officers (ACPO) and has the support of the Home Office Crime Reduction & Community Safety Group. Further guidance can be found on its implementation in the publication 'Safer Places' written by The Office of the Deputy Prime Minister (ODPM).*
- ii. Developers will need to be aware that in addition to the requirements of planning legislation and guidance, local authorities (and other bodies within each local Community Safety Partnership) have a wider responsibility under Section 17 of the Crime and Disorder Act 1998 to consider the crime and disorder implications of all their activities, and to do all that they can to reduce opportunities for crime and fear of crime in the exercise of their functions'*
- iii. Appendix B is based on national good practice as a means of quantifying the additional policing infrastructure that is required to meet current projected growth within Dover District and the average cost of providing this infrastructure on a individual dwelling basis.

7.6 Cost and Funding for Additional Policing Infrastructure

7.6.1 Kent Police is seeking formula based contributions from development schemes in accordance with the thresholds set out below. This approach has been adopted to ensure there is transparency and consistency to the calculation of contributions, with the objective of increasing accountability, speed and certainty to the process. The approach that is advocated in the DCLG Planning Obligations Guidance (July 2006) and, as indicated above, is

in accordance of national best practice developed by police forces across the country.

7.6.2 The calculation of contributions follows a formulae based approach which applies a cost per new dwelling to all new developments. In due course Kent Police will submit a similarly calculated cost per unit of business floor space. The nature of planning for new policing infrastructure is such that it is not appropriate to apply a threshold to developments above which a contribution will be required. The methodology proposes that any increase in population within a policing area will have an impact on the ability of the Police Force to deliver an efficient and effective policing service; accordingly it is appropriate to require proportionate contribution from each new unit of accommodation that has an impact on delivery of the service.

7.6.3 Kent Police is undertaking a full review of its policing model as part of the process of planning for growth. To continue delivery of an efficient and effective police service in response to planned growth, reorganisation and expansion of infrastructure will be required.

7.6.4 Planned growth will necessitate additional staff and supporting infrastructure comprising, for example, high visibility Neighbourhood Police Officers; Police Community Support Officers (PCSOs); and, important support functions located to meet strategic needs across the Force. It will not always be necessary to locate new facilities within or adjoining new developments to police them efficiently and effectively.

7.6.5 Pooled contributions may be used by Kent Police to provide additional policing infrastructure required to maintain efficient and effective policing service. This could take a variety of forms ranging from purpose-built new facilities to extension/adaption of existing buildings. The particular form of infrastructure provision will differ according to circumstances, but the consistent approach will ensure that the standard of service as measured according to ratio of staff to incidents is maintained across each local policing area. The methodology identifies an acceptable baseline standard for operation of the police service to be maintained in the face of development and population

increase. As previously explained, some of this infrastructure requirement may not be within the Dover District Council administrative area.

- 7.6.6 In accordance with guidance within Circular 05/05, Kent Police Authority will 'ring fence' contributions and report to Dover District Council on how the monies generated through planning obligations has been used. Any monies not expended within a timescale to be specified within the legal agreements would be returned. In accordance with current practice and procedures a clear audit trail would be established to ensure transparency and clear accountability.
- 7.6.7 Kent Police is assessing all contributions on the basis of providing for additional policing infrastructure needs and resources generated by population growth arising from planned residential and, in due course, business/commercial developments. Contributions would be used by Kent Police specifically towards the provision of new and enhanced accommodation; equipment; infrastructure; etc necessary to support additional staffing requirements generated by the development and gap funding for staff costs until Government funding 'steps in'.
- 7.6.8 In addition an assessment will be made on a case-by-case basis for the need for possible enhanced contributions for specialist equipment and infrastructure such as Automatic Number Plate Recognition (ANPR) cameras; Airwave communication masts; etc or where Kent Police considers that a particular development will generate a greater demand on policing resources.
- 7.6.9 Contributions may be requested 'in kind' and/or financial depending on the development and the demands on policing services it generates. Circular 05/05 Annex B paras B9 and B15 on Planning Obligations support this.

7.7 National Legislative and Policing Context

- 7.7.1 Kent Police Authority has a statutory duty to secure the maintenance of an efficient and effective police force for its area under the direction and control of its Chief Constable.

- 7.7.2 Of relevance to seeking developer contributions towards policing services is Section 6 of the Police Act 1996 (which places a duty on police authorities to provide an effective and efficient police force for its area) and Section 17 of the Crime and Disorder Act 1997 (which requires local authorities, police authorities and other agencies to consider crime and disorder reductions and community safety in the exercise of all their duties and activities).
- 7.7.3 National planning policy guidance provides support for delivering effective and efficient policing to reduce crime and create safer places to live. Planning Policy Statement (PPS) 1 at paragraph 18 states that the planning system should promote development that 'creates social cohesion and inclusion through delivering safe, healthy and attractive places to live'.
- 7.7.4 The Government's Sustainable Development and Sustainable Communities Strategies (2005) to be delivered by the spatial planning system identify policing and issues of community safety as important factors in the creation of safe environments and sustainable, inclusive communities.
- 7.7.5 PPS1 describes the Government's overarching objectives for the planning system and sets out how planning should play a key role in delivering safe, secure, sustainable communities. In preparing their development plans Local Planning Authorities have a duty to promote communities that are 'inclusive, healthy, safe and crime free' (para 27ii)
- 7.7.6 A companion good practice guide 'Safer Places – The Planning System and Crime Prevention' provides guidance on creating safe and secure places and refers to the scope for developer contributions to be used to create safer environments within the area of a proposed development.
- 7.7.7 Local authorities are themselves under a statutory duty to consider crime and disorder reduction in the exercise of all their duties (Section 17 Crime & Disorder Act 1998).

7.7.8 Section 19 (2)(f) & (g) of the Planning & Compulsory Purchase Act 2004 requires all local planning authorities in preparation of their Local Development Frameworks (LDF) to have regard to the provisions of the Community Strategy, which includes community safety as a key theme. PPS 12 requires the Core Strategy to be aligned with the Sustainable Community Strategy (SCS) and to actively enable delivery of the spatial elements of the SCS.

7.7.9 The Green Paper – ‘Homes for the Future: More Affordable, More Sustainable’ is extremely clear in defining the role of the Police in the planning of future communities. In outlining objectives for implementation of the measures described in the Green Paper the text states:

7.7.10 "We want to see local authorities engaging the police and police authorities at the earliest opportunity to ensure safety and security are an integral part of the planning process" (Ch.12 para.12)

7.7.11 Safety and security are fundamental requirement of sustainable communities, they cover a wide range of activity designed to reduce the likelihood of crime, disorder, anti social behaviour, road casualties and fires which impact on people’s quality of life. Importantly it also involves reducing the fear of crime, to promote people’s sense of well-being, and reducing the harm caused by drug and alcohol misuse and behaviour damaging to the environment.

7.8 Why Community Safety from a policing perspective is so important

7.8.1 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 and anti-social behaviour can be designed out of new development, design measures alone will not address community safety fully. Neighbourhood Policing is a national initiative aiming to put communities – their needs, their issues and their priorities – at the heart of local 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. To provide this form of policing effectively and

to achieve one of the Government's central objectives for the spatial planning system, a physical presence within existing and new neighbourhoods is necessary, together with new or expanded support facilities elsewhere to help facilitate the delivery of crime-free environments.

7.8.2 Crime and disorder has a tangible impact on economic growth, social exclusion and quality of life. With the creation of new neighbourhoods and expanded communities the pressure on existing policing infrastructure and resources will increase, necessarily compromising the ability of the service to deliver safe and crime-free environments as required by PPS1, and to deliver an effective Police service as required by the Police Act 1996.

7.8.3 Without a tailored range of community safety measures to address these pressures:

- 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
- new inhabitants and businesses may choose not to move to an area; existing residents and businesses may move away.

8. Existing Developer Contribution System

- 8.1 Under the present system, developer contributions towards policing may either be secured through planning conditions or through planning obligations (or 'Section 106 Agreements' – Agreements under Section 106 of the Town and Country Planning Act 1990 as substituted by the Planning and Compensation Act 1991¹) and it can be expected that, in most cases, developer contributions towards policing will be delivered through the latter mechanism.
- 8.2 Government guidance on the use of planning obligations under Section 106 of the Town and Country Planning Act 1990 (as substituted by the Planning and Compensation Act 1991) is provided in Circular 05/2005. In brief, planning Section 106 Agreements are private legal agreements negotiated, usually in the context of planning applications, between Local Planning Authorities and developers. They are intended to make acceptable development that would otherwise be unacceptable in planning terms.
- 8.3 In Circular 05/2005 there is no reference to Section 106 contributions towards policing services. However, in its section that provides examples of the use of planning obligations at paragraph B15 it states:
- 8.4 " *Where a proposed development would, if implemented, create a need for a particular facility that is relevant to planning but cannot be required through the use of planning conditions, it will usually be reasonable for planning obligations to be secured to meet this need if a proposed development would give rise to the need for additional or expanded community infrastructure, for example a new classroom, which is necessary in planning terms and not provided for in an application, it might be acceptable for contributions to be sought towards this additional provision through a planning obligation.*"

¹ Kent Police is very much aware of the Community Infrastructure Levy Regulations 2010 and the potential changes to the system these may bring about.

8.5 In accordance with Circular 05/2005, developer contributions to policing services may only be sought for, and spent on, measures that directly relate to the individual source development. Also, Section 106 monies cannot be obtained to make up existing shortfalls.

8.6 Thames Valley Police has obtained Counsel opinion which confirms that police forces are legitimate recipients of developer contributions, satisfying the requirements of Circular 05/2005. In addition, a significant number of police forces have obtained developer contributions towards policing:

- Gloucestershire Constabulary will shortly be provided with a small facility within a retail development in Gloucester, secured under a planning condition;
- Wiltshire Constabulary has been successful in securing under a Section 106 Agreement a new police station within a major residential development in Swindon. This is within the Wichelstowe development south of Swindon and the facility will be run jointly with the ambulance service. A temporary police station is being provided to give security during the construction phase;
- Thames Valley Police has secured a replacement Bracknell Police Station as part of town centre regeneration.
- Thames Valley police is negotiating for neighbourhood facilities in two large developments and has secured Heads of Terms agreement to a small town centre drop in base within a large town centre plus a financial contribution;
- Northamptonshire Constabulary has secured Section 106 Agreement developer contributions towards policing infrastructure in Corby and Wellingborough. These comprise provision of community policing stations;
- Leicestershire Constabulary has secured developer contributions towards provision of additional policing infrastructure in relation to developments in Oadby, Wigston, Hinckley and Bosworth;
- Cambridgeshire Constabulary has been successful in securing developer contributions towards three new police stations;

- Kent Police has itself been successful in securing developer contributions for a development at Eastern Quarry in the Thames Gateway.

9. Emerging Developer Contribution System

- 9.1 Policy and legislative context is likely to change with a new Government having been elected in May 2010 and the introduction of the Community Infrastructure Levy Regulations 2010 in April the same year. Until those changes and consequences are known and fully understood it is not possible to speculate on the impact upon Kent Police, therefore, this document is based upon what is currently known. Once the changes and associated impact are understood then any consequences as to the contents of this document and the requested developer contributions will be considered and amendments made accordingly including in relation to the level of developer contributions sought.

10. Concluding statement

10.1 Kent Police has undertaken a detailed review of the currently projected developments within the Dover District Council area and the impact these will have on requirements for policing having regard to existing and future funding. Based on a national best practice formula approach, it has identified that in order to provide efficient and effective policing to the proposed development, a developer contribution towards policing is required as follows in relation to residential developments only at this time. Kent Police will provide details for business/commercial developments in due course:

COST BY UNIT TYPE

COST BY UNIT TYPE		Residential Cost	£290
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	

10.2 Kent Police will undertake to spend this money on providing additional policing infrastructure and other associated matters as detailed within this document. For the avoidance of doubt this policing contribution has been calculated on the assumption that the proposed developments will be designed and built in accordance with Secure by Design guidance. Where such guidance has not been followed Kent Police reserves the right to seek further developer contributions to cover the additional costs of providing an effective and efficient policing service resulting from this.

10.3 Under the present planning and legal system, the police are a legitimate recipient of developer contributions towards policing and there are precedents elsewhere of policing contributions being secured under Section 106 Agreements and planning conditions.

10.4 Kent Police therefore requests Dover District Council to have due regard to the contents of this statement when establishing policy as well as negotiating and determining appropriate developer contributions whether under a Section 106 Agreement, Community Infrastructure Levy Regulations or any other legislative framework or methodology from time to time in existence when considering planning applications for proposed developments.

For any questions in connection with this statement or in regard to Secure by Design guidelines please contact Trevor Hall, Kent Police on 01622 650151 or by e-mail: cil@kent.pnn.police.uk in the first instance.

Appendix A
Methodology
for
Calculating
Developer Contributions

The methodology for calculation of the Standard Charge for policing infrastructure is set out below and is based on base line staff information for 2006.

The police service is predominantly a population-based service and new infrastructure requirements are generated, mainly although not exclusively, by expanding populations associated with new development.

STEP 1

Derive an incident ratio per head of population, based on existing population, and projecting this into the future to determine likely number of future incidents arising from an expanding population.

STEP 2

Establish an acceptable ratio of incidents to police officers and support staff, based on delivery of an efficient and effective police service. This allows the need for additional staff numbers to be calculated, based on an expanding population. This stage provides a proportional link between population increase and the need for increased policing infrastructure.

STEP 3

Derive the additional infrastructure requirement from the additional staff quotient numbers required to provide effective policing. Accommodation/infrastructure needs are based upon a standard floor space and set up cost per officer and support staff. It is then possible to calculate costings per additional staff member.

STEP 4

To divide the projected infrastructure costs by the planned number of new dwellings to give a standard charge per dwelling. This figure requires adjustment to determine a new resident occupancy rate per new dwelling (on the basis that additional infrastructure requirements are population not dwelling driven) and a proportionate charge per new dwelling (see STEP 6).

STEP 5

To apportion the total cost per dwelling between residential and employment development, based on policing statistics relating to the proportion of incidents relating to business uses against all incidents.

STEP 6

To adjust the standard charge per dwelling to reflect occupancy rates of new residents. This is achieved by dividing the projected number of new residents by the forecast number of dwellings to produce a new resident occupancy rate per dwelling. The cost per dwelling is calculated by applying the occupancy factor to the new resident cost. This figure is adjusted to provide a residential charge and a business charge, according to the ratio of residential to business incidents. The residential figure per dwelling is then divided by the average occupancy rate for dwellings in the District to give a proportionate cost per 'new occupant' that can then be applied to occupancy rates for various sizes of dwelling. The business figure will be a new employee figure; a cost per unit of floor space can be calculated using the densities in the DTZ/SEERA 2004 report "Use of Business Space & Changing Working Practices in SE".

Appendix B

**Average Cost of Providing Policing Services
in
Dover District
on an
Individual Dwelling Basis**

Draft – For Consultation

CORE DATA

All incidents	28,780
All crime	7,876
Non crime incidents	23,277
Custody use (CDRP level)	4,723
Custody use (FORCE LEVEL)	56,376
Business related crime	
Non business crime	7,876
% Business Crimes	0.0%

Current CDRP Officers	123.15
BCU/LPA support staff	21.2
LPA PCSO's (target)	0.00
Forcewide Officers	35.57
Forcewide/central Staff	37.17
LPA Volunteers & Specials	10.88
Total current CDRP Police Staff	104.84

Total CDRP allocated staff	227.99
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Total Force Officers	1,014.5
Total forcewide support	1,594.8

Total Current Force Police Staff	1594.79
Total Force Staff	6194.20

Total f s edited as input number

Base Year

Population RSS period	2006	2006	2011	2016	2021	2026
Local population projection	106,400	106,400	110,900	113,500	115,800	118,600
Adjusted population estimate	106400	106400	110,900	113,500	115,800	118,600

Dwellings on which pop projection based	10,100
Total new population projected over RSS period	12,200
Current Household Size	2.23
Ratio of new population to new dwellings (H8/H7)	1.21
Target dwellings in RSS	10100
Estimated population generated by RSS target	12200
Population difference (projection v revised growth)	0
Projected dwellings 2006 - 2026	10100
Projected population 2006 - 2026	12,200

Standard Floor Area	sqm GIA	150,587	24.31	Sqm/FTE
Custody Floor Area	sqm GIA	4,665	0.75	Sqm/FTE
Total Floor Area	sqm GIA	155,252	25.06	Sqm/FTE

Force custody accommodation	170	Cells
Current Force custody cell need	170	Cells
Ave Force floor area per cell	27.44	Sqm

	Build	Land	Total	
Standard space build cost	£2,700	£642	£3,342	£/sqm GIA
Custody space build cost	£4,600	£272	£4,872	£/sqm GIA

Staff Set Up Cost	Complete table in Staff Set Up Cost sheet
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Average household occupancy by dwelling size	Complete table in Cost By Unit Type sheet Source locally if possible & indicate source
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Average employment densities	Use the table in Cost By Unit Type sheet
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CORE DATA & PREDICTIVE PROJECTIONS

	Current	000's			2011	2016	2021	2026	Change	% Change
Population (source HCC)	106400	106.4			110900	113500	115800	118600	12200	11.5
Demand on Resources:-		Ratio per 1000	Moderation Factor	Revised Ratio						
All incidents	28780	270	1.00	270	29997	30700	31323	32080	3300	11.5
All crime	7876	74	1.00	74	8209	8402	8572	8779	903	11.5
Non crime incidents	23277	219	1.00	219	24261	24830	25333	25946	2669	11.5
Custody use	56376	530	1.00	530	58760	60138	61357	62840	6464	11.5
Business related crime	0	0			0	0	0	0	0	#DIV/0!
Non business crime	7876	74			8209	8402	8572	8779	903	11.5
Total crime	7876	74			8209	8402	8572	8779	903	#DIV/0!

		Moderation Factor	Revised Ratio
% Business Crime to All Crime	0%	1.00	0.00

WORKFORCE PROJECTIONS

	Current	000's				2011	2016	2021	2026	Growth	% Change
Population (source HCC)	106400	106.4				110900	113500	115800	118600	12200	11.5
Demand on Resources:-	Current Incidents	Ratio per 1000	Moderation Factor	Revised Ratio	Predicted Incidents						
All incidents	28780	270	1.00	270	→	29997	30700	31323	32080	3300	11.5
LPA Officer Projection	Number	Incidents per officer	Moderation Factor	Revised Ratio	Predicted Staffing						
Current CDRP Officers	123.15	234	1.00	234	→	128	131	134	137	14.12	11.5

Ratio of Support Staff to PO	Number	Ratio to PO	Moderation Factor	Revised Ratio
BCU/LPA support staff	21.22	0.17	1.00	0.17
LPA PCSO's (target)			3.00	
Forcewide Officers	35.57	0.29	1.00	0.29
Forcewide/central Staff	37.17	0.30	1.00	0.30
LPA Volunteers & Specials	10.88	0.09	1.00	0.09
			1.00	
Total	104.84	0.85		0.85

Additional Staffing By 2026	Staff Growth
CDRP Officers	14.12
BCU/LPA support staff	2.43
LPA PCSO's (target)	
Forcewide Officers	4.08
Forcewide/central Staff	4.26
LPA Volunteers & Specials	1.25

New Staff by 2026	
Police Officers	14
Police Staff	12
Total	26

Total	26.14
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WORKFORCE PHASING

Additional Staffing By 2011	Staff Growth
Current CDRP Officers	5.21
BCU/LPA support staff	0.90
LPA PCSO's (target)	
Forcewide Officers	0.26
Forcewide/central Staff	
LPA Volunteers & Specials	0.02

Total	6.39
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Additional Staffing By 2016	Staff Growth	Change from 2011
Current CDRP Officers	8.22	3.01
BCU/LPA support staff	1.42	0.52
LPA PCSO's (target)		
Forcewide Officers	2.37	2.11
Forcewide/central Staff	2.48	2.48
LPA Volunteers & Specials	0.73	0.70

Total	15.21	8.83
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Additional Staffing By 2021	Staff Growth	Change from 2016
Current CDRP Officers	10.88	2.66
BCU/LPA support staff	1.87	0.46
LPA PCSO's (target)		
Forcewide Officers	3.14	0.77
Forcewide/central Staff	3.28	0.80
LPA Volunteers & Specials	0.96	0.24

Total	20.14	4.93
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Additional Staffing By 2026	Staff Growth	Change from 2021
Current CDRP Officers	14.12	3.24
BCU/LPA support staff	2.43	0.56
LPA PCSO's (target)		
Forcewide Officers	4.08	0.94
Forcewide/central Staff	4.26	0.98
LPA Volunteers & Specials	1.25	0.29

Total	26.14	6.00
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ACCOMMODATION NEED & COST

New Staff Need To RSS Expiry	26
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Total New Accommodation Need (Sqm)	680
Total New Accommodation Capital Cost	£2,342,281

		Current	Moderation	Revised
Standard Accom	Sqm GIA	150,587		
Total Force staff	FTE	6,194		
Floor area per staff (sqm)		24.31	1.00	24.31

	£rate	Area	Cost
Standard	£3,342	636	£2,123,957
Custody	£4,872	45	£218,324
Total		680	£2,342,281

Standard Accommodation Required	636
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Force custody accommodation	170	Cells		
Current custody use per cell	332		0.9	per day
Current custody cell need	170	Cells		
Current target use per cell	332		0.9	per day
Projected custody cell need	189	Cells	19	Growth cells
Ave floor area per cell by Force	27.44	Sqm		
CDRP Custody use as a % of Force Total	8.38%			
Custody accomodation required by CDRP	45	Sqm		

Cost per	New Person	New Dwelling
Standard	174.094865	210.2928072
Custody	17.89538255	21.61620467
Total	£192	£232

Custody Use Information Summary Table				
CDRP	2006	2026	%Split	
Custody Use Apportionment	56376	62840.17	100.00%	
			0.00%	
			0.00%	
			0.00%	
			0.00%	
Total	56,376	62,840	100.00%	

STAFF SET UP COST

One Off Start Up Costs Police Officers	£
Uniform & Protective Equipment	1,636
Patrol Car	2,751
Cost of recruitment	968
IPLDP Probationers induction training	900
IT Equipment	595
Furniture	845
Total	7,695

One-off Start Up Costs Police Staff (incl PCSOs)	£
Cost of Recruitment	968
Advertising posts	
Staff Training/Induction	
IT Equipment	595
Furniture	845
Uniform (PCSOs)	160
Uniform (CCR staff) not included	
Total	2,568

Non recoverable 3 yr initial salary cost	
Police Officers yr 8 Constable rate	47,975
Support Staff A3 median point	21,765
Support Staff PCSO (SCP 27 + 3 SHIFT)	31,414

Staffing Growth By 2026	
Current CDRP Officers	14.12
BCU/LPA support staff	2.43
LPA PCSO's (target)	
Forcewide Officers	4.08
Forcewide/central Staff	4.26
LPA Volunteers & Specials	1.25
Total	26.14

Staff Set Up Cost			
Staff Category	Number	Cost Rate	Total Cost
Police Officers	18	7,695	£140,041
Police Staff	8	2,568	£20,396
Totals	26		£160,437

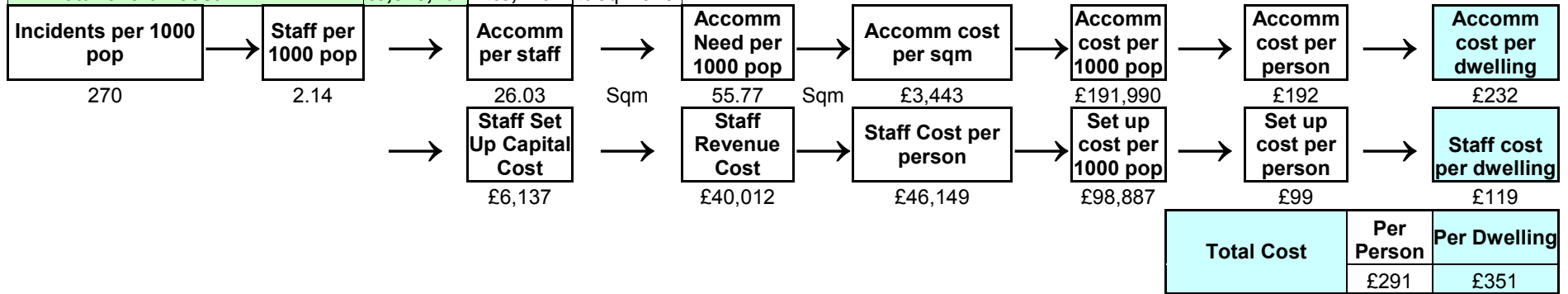
Total Staff Set Up Cost			
	Staff Cost per	New Person	New Dwelling
Total		13.15059	15.8848748

Staff 3 Yr Revenue Cost			
Staff Category	Number	Cost Rate	Total Cost
Police Officers	18	47,975	£873,114
Police Staff	8	21,765	£172,869
Totals	26		£1,045,984
Total Non Recoverable 3 yr Salary Cost			
Total			£1,045,984

	Staff Cost per	New Person	New Dwelling
Total		85.73636	103.5627341
	Staff Cost per	New Person	New Dwelling
Total		£99	£119

SUMMARY

Total New Population	12,200	12.20	000's
Total Dwellings planned	10,100		
Population per new dwelling	1.21		
Total new incidents projected	3,300		
Total New Police Officers needed	14.1	1.16	/000 pop
Total New Police Staff needed	12.0	0.99	/000 pop
Total New Staff needed	26.1	2.14	/000 pop
Total New Accom needed	680	26.03	sqm/staff
Total New Accom cost	£2,342,281	£3,443	£/sqm
Total New Staff Cap Set Up cost	£160,437	£6,137	£/staff ave
Total New Staff 3 yr Rev cost	£1,045,984	£40,011.77	£/staff ave
Total Staff cost	£1,206,421	£46,149	£/staff ave
Total overall cost	£3,548,702	£5,216	£/sqm ave



	% Crimes	Split Dwelling cost	Ave Household Size 1.21	
Business related	0%	£0	£0	£ per new employee
non Business related	100%	£351	£351	£ per new dwelling
Total	100%	£351	£290	(£ per dwelling person)

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