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Dear Sir/Madam.

CAMDEN CIL DRAFT CHARGING SCHEDULE CONSULTATION

This representation relates to Section 106 contributions to mitigate impact on crime. Lambert Smith Hampton (LSH) is appointed as town planning advisors to the Metropolitan Police Service (MPS) and is responding on their behalf. We request that Policing Infrastructure should be collected through Section 106 contributions from individual developments to ensure that the necessary funding is accounted for. We would like this request to be referenced in the Camden Local Plan and/or forthcoming planning policy documents.

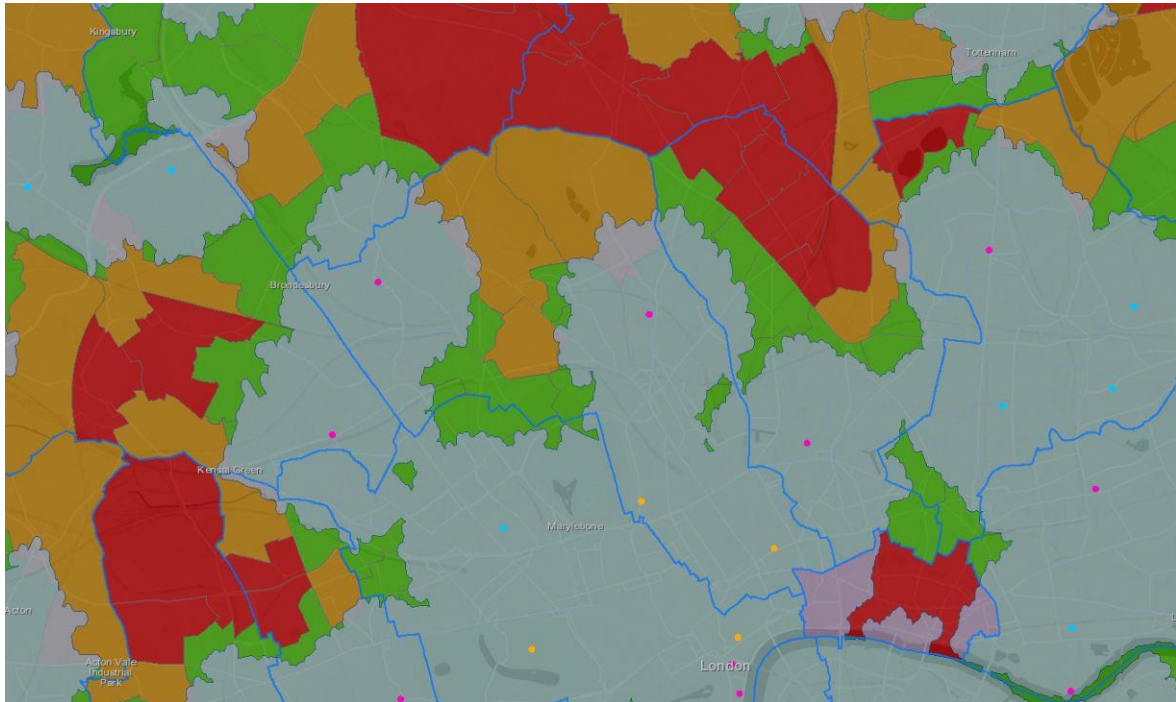
Requirement for District Ward Offices

The MPS have identified the need for District Ward Office (DWO) accommodation as part of their Estates Strategy. A DWO is a small room containing lockers and operational equipment and forms a 24/7 base of operation for the MPS. It is not public facing, but rather a location typically used by officers at the beginning and the end of their shifts. The MPS currently police over 600 wards across Greater London, DWOs are integral to these efforts. The attached document prepared by Knight Frank highlights the DWO requirement in more detail.

On the next page is a map which illustrates the requirement for DWOs in the London Borough of Camden. The amber colours relate to wards which have the greatest need for DWOs coverage. Through this map, the MPS have identified the following locations in need of DWO coverage;

The amber wards are as follows:

- 1) Belsize Ward;
- 2) Hampstead Town Ward; and
- 3) Highgate Ward.



The MPS is therefore requesting that the London Borough of Camden include a section (within forthcoming planning policy documents) which highlights the importance of the delivery of District Ward Offices in schemes referable to the Mayor. The MPS is already having success in securing DWOs with developers (through planning applications) and Local Planning Authorities (through planning policy). In many cases, Local Authorities and developers consider the requirement to have a positive impact on development proposals.

Acceptance of Policing Infrastructure as a Legitimate S106 Charging Item

It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within the s106. A number of policing authorities have sought legal advice on this issue and received confirmation of this. The advice also confirms that s106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure and CCTV, staff set up costs, vehicles, mobile IT and PND. A breakdown of non-building related infrastructure sought by MPS is detailed below.

For example, in the case of *The Queen (on the application of The Police and Crime Commissioner for Leicestershire) v Blaby District Council* [2014] EWHC 1719 (Admin), Judge Foskett stated:

61... "I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the "consumer view" of the issue. The providers of the service (namely, the Claimant) have statutory responsibilities to carry out and, as the witness statement of the Chief Constable makes clear, that in itself can be a difficult objective to achieve in these financially difficult times. Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police.

62. *I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area.”*

The above conclusions echo those reached in an earlier appeal case of Land off Melton Road, Barrow-upon-Soar (APP/X2410/A/12/2173673), in which the Secretary of State endorsed the following findings of the Inspector:

291... *“the twelfth core planning principle of the Framework... can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to paragraph 69, should aim to achieve places which promote, inter alia, “safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.*

292. *Adequate policing is so fundamental to the concept of sustainable communities that I can see no reason, in principle, why it should be excluded from the purview of S106 financial contributions, subject to the relevant tests applicable to other public services. There is no reason; it seems to me, why police equipment and other items of capital expenditure necessitated by additional development should not be so funded alongside, for example, additional classrooms and stock and equipment for libraries.” (Emphasis added)”*

There is an extensive array of Secretary of State and Planning Inspectorate decisions that compellingly support the above conclusions, including two in July 2017.

Breakdown on Non Property Related Infrastructure sought by MPS

A breakdown of non-property related infrastructure likely to be sought by the MPS in relation to major applications referred to the Mayor for London is as follows:

- **Staff set up costs**
 - Uniforms.
 - Radios.
 - Workstation/Office equipment.
 - Training.
- **Vehicles**
 - Patrol vehicles.
 - Police community support officers (PCSO) vehicles.
 - Bicycles.
- **Mobile IT:** The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.
- **CCTV technologies:** Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.
- **Police National Database (PND):** Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.

MPS is compiling a methodology for calculating these s106 contributions, which should be available soon.

Summary

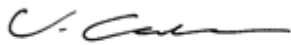
It is essential to deliver the necessary policing infrastructure to support the growth in homes, offices and other uses, and support the cost of associated non-building related infrastructure.

With regards to DWOs, we request the Council to include an acknowledgement in forthcoming planning policy documents detailing that in schemes referable to the Mayor the MPS will liaise with developers to arrange potential on site delivery of a DWO.

MPS is working hard to achieve cost savings and find new and alternative sources of capital and revenue funding to support policing in London. S106 charges to support policing at Borough level are necessary and appropriate.

Should you have any queries or issues in relation to this representation, please do not hesitate to contact me on the details provided below.

Yours sincerely,



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Encl. DWO 'Pitch Pack'

Dedicated Ward Office (DWO) Programme: Pitching Pack & FAQs

◆ *What is a Dedicated Ward Office (DWO)?*

A DWO is a 24/7 base of operation for officers of the Metropolitan Police Service (MPS). It is not a public facing office, but rather a location typically used by officers at the beginning and the end of their shifts. The MPS currently police over 600 wards across Greater London, DWOs are integral to these efforts.

◆ *How many officers will use the DWO?*

The number of officers will depend on the number of wards being served out of the location in question. There will be a minimum of two wards at every location. An estimated break down is provided below:

Number of Dedicated Ward Offices	Number of Officers/ Lockers
2	7
3	10
4	13
5	16
6	19

◆ *How much space will the DWO require?*

The space requirement of the DWO is variable dependent. The first variable is the number of DWO teams which will operate out of the location. The more DWO teams, the larger the space requirement. The DWO teams also have requirements around access to toilets, showers, and a kitchen facility. If these services can be shared with an existing user then the amount of space required by the DWO is reduced, if such provisions do not currently exist then the amount of space required will have to increase accordingly so such services can be provided. An approximate guide for a DWO without welfare facilities provided is below, please note that this is subject to change:

Number of Dedicated Ward Offices	Number of Officers/ Lockers	Approximate space requirement without welfare facilities.
2	7	9 sq.m.
3	10	15 sq.m.
4	13	20 sq.m.
5	16	25 sq.m.
6	19	30 sq.m.

◆ *What are the site requirements of the Met Police?*

The sites will need to provide the following:

- Unrestricted 24/7 access for officers into the base;
- Airwave and 4G wireless connectivity/reception inside the DWO;
- Showers, toilets and kitchen facilities on site;

- Mains power for charging units etc.;
- Suitable ventilation for lockers;
- Perimeter of demise is sufficiently robust to meet MPS security requirements; and
- Site provider will only have emergency access rights to the MPS demise.

◆ *Will the MPS take a lease or a license?*

The MPS will not be taking leases on DWOs, and as such will be operating under a license.

◆ *What level of rent can the applicant expect to receive from the MPS?*

The aim of the DWO program is to operate as close to nil cost as possible. However, the MPS recognize that this is not always an option and rents can be negotiated on a site-specific basis if need be. Market rents are not viable.

◆ *Are MPS able to confirm that service charges/utilities, rates, etc. would be paid as usual?*

If required the MPS can cover the costs associated with the space, however, the aim of the DWO program is to operate as close to nil cost as possible.

◆ *Is it possible to see an example of a DWO configuration? What furniture is expected to be included within the office?*

A draft configuration of a two ward DWO base is provided below. The key furniture within the office is the officers lockers, charging stations for body-worn cameras, charging stations for tablets, an area for general storage and a changing area. Please note that this configuration assumes that toilets, showers, and kitchen facilities are shared with other users outside of the DWO office.

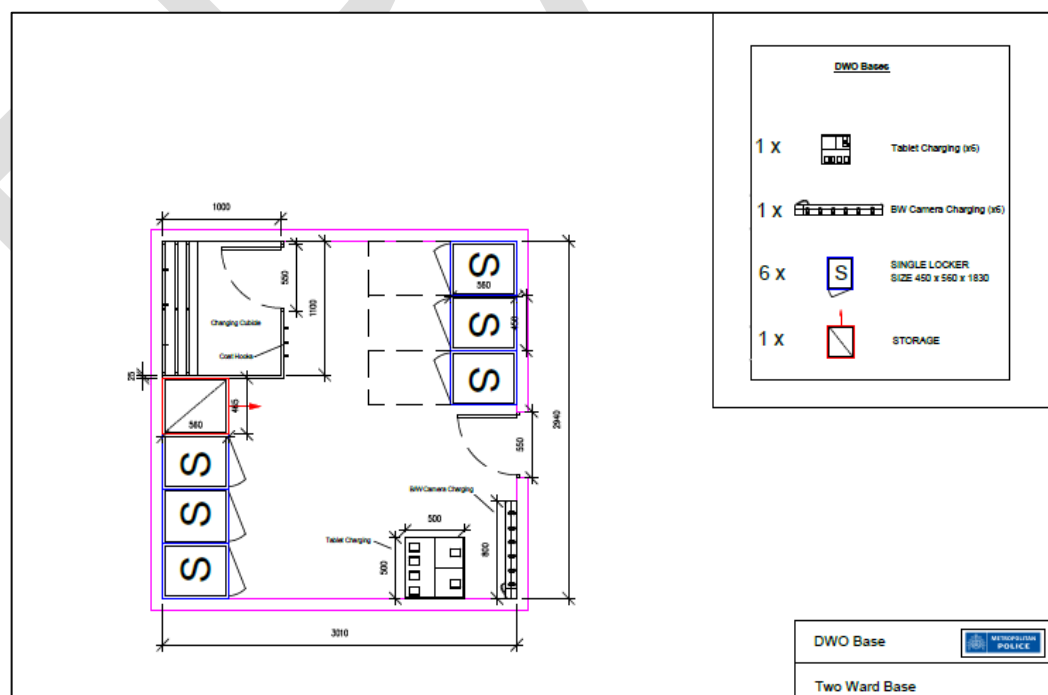


Image: A draft configuration of a two ward DWO base – Produced by the MPS.

- ◆ *Is it possible to see an example of a s106 agreement that includes a DWO?*

Not at this time.

- ◆ *Does the MPS require 24/7 access to the site?*

The MPS requires 24/7 access to all DWOs for operational purposes.

- ◆ *Does the MPS require a lift?*

No.

- ◆ *Does the MPS need access to power and water?*

Yes.

- ◆ *Where would the MPS like to be positioned in the building and on what floor?*

The priority of the MPS on any potential location is that the site meets the site-specific requirements discussed above, what floor and where are secondary concerns to the MPS.

- ◆ *Who would fit out the unit? Would shell and core be sufficient?*

The MPS can fit out the unit and will do so from shell and core if required on a site-specific basis.