

## **Suffolk Coastal District Council**

### **Community Infrastructure Levy – Draft Charging Schedule**

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### **Background**

It is well documented that from a Countywide and National perspective, SCDC enjoys a low level of crime and as a result those living within SCDC on the whole feel secure and safe. It is acknowledged that one of the key motivators for people moving to an area is that of low crime and safety.

Therefore SCDC, SC and developers have a vested interest in maintaining the current level of policing afforded to the SCDC community (be this the established or emerging community).

Suffolk Constabulary holds no views as to the merits of a new development, only that the development does not have an adverse impact on the current level of policing and community safety enjoyed by those who live and work in the area.

### **Q1: Do you consider that the Council has adequately identified a funding gap using appropriate evidence?**

It is not felt that the need for contributions towards policing has been acknowledged to the appropriate level by SCDC. Therefore an understanding the level of funding gap that will need to be addressed, as a result of the scale of development being proposed, is not appropriate as it will not have incorporated the needs of policing.

If the proposed rates set have not factored in an adequate need to contribute towards policing, they will by default have been set too low and a funding gap will exist. This view is evidenced in Q2.

### **Q2: In setting the CIL rates, do you consider that the Council's economic viability assessment has used appropriate available evidence? If you disagree please provide evidence.**

The Suffolk Coastal Community Infrastructure Levy Viability Study of May 2014, pba Peter Brett, does not make reference to policing and community safety. Therefore, unlike Health, Education and Libraries etc, it can only be deduced that policing has not been considered.

This belief is further supported by the omission of policing in the draft Community Infrastructure Levy, Draft Regulation 123 List, where policing is omitted from the Adastral Park Development (the

largest development) as infrastructure which will be delivered through planning obligations (and not CIL) relating specifically to this development.

Although it is acknowledged that Police Infrastructure is shown within **'infrastructure that may be funded by CIL and will not be sought through planning obligation'** this will not be to the level that will address the policing needs as set out in the response from Suffolk Constabulary to Navigus Planning, and indeed appear within the Suffolk Coastal Infrastructure Delivery Plan.

**Q3: In setting the CIL rates, do you consider that the rates proposed represent the appropriate balance between desirability of funding infrastructure and the need to maintain overall viability of growth across the District?**

As stated in Q1, Suffolk Constabulary holds no view as to the level of proposed growth, only that the growth does not have an adverse impact of the current level of policing enjoyed by those who live and work within SCDC.

Re the funding of policing infrastructure, and the lack of comment re-funding for policing, Suffolk Constabulary is concerned that policing has not been acknowledged to the appropriate level and as a result will not receive adequate funding for the necessary infrastructure.

An opportunity to discuss this concern with SCDC, and allay such apprehensions, would be welcomed by the Constabulary.

**Q4: Do you consider the boundaries for the different charging zones to be appropriate? If you disagree please provide evidence.**

No comment.

**Q5: Do you have any other comments on the Draft Charging Schedule or any other associated documents or evidence based documents?**

Through the lack of acknowledgment of policing through the Suffolk Coastal Community Infrastructure Levy Viability Study of May 2014, pba Peter Brett, and omission of policing in the Adatral park development, it can only be deduced that policing is not being considered as an equal recipient of funding through CIL and the planning process.

The Constabulary, as with other key stakeholders, needs to evidence its requirements and cannot always expect to receive all that is requested through planning obligations. However, the fact that policing has for too long been omitted from the planning process, unlike Libraries, Education, Health etc, does need to be understood by the Constabulary i.e. how has the evidence submitted by other parties warranted their inclusion, when policing has not?

It is important that from the off the Constabulary states its intent to be robust and ensure that it is considered an equal recipient of developer contributions as other key stakeholders (which have more traditionally been the main recipients of funding through the planning process).

To this end, the Association of Chief Police Officers (ACPO) has sought counsel from a leading QC in the planning arena, Ian Dove QC, as to the police eligibility for funding through the planning process.

The advice given supports the view that the police are qualified for funding through the planning process and eligible for funding that includes vehicles, communications technology, training uniform, ANPR etc.

This assertion is comprehensively evidenced by the following Secretary of State and Planning Inspector decisions, which confirm Section 106 contributions towards policing and in the context of CIL Regulation 122 tests.

- APP/H1840/A/13/2199085 (Secretary of State determination) – 02 July 2014
- APP/F2415/A/12/21833653 (Secretary of State determination) – 17 April 2014
- APP/X2410/A/13/2196938 & APP/X2410/A/13/2196929 (Secretary of State determination) – 08 April 2014
- APP/T2405/A/13/2200867 – 02 January 2014
- APP/T2405/A/13/2193758 – 01 August 2013
- APP/X2410/A/12/2173673 (Secretary of State determination) – 14 May 2013
- APP/X2410/A/12/2187470 – 15 April 2013
- APP/F2415/A/12/2179844 – 14 February 2013

The most recent Secretary of State decision of 02 July 2014 concerned a development in West Mercia Police geographical area (Wychavon District). The Section 106 agreement included a contribution for police premises, equipment and vehicles, as per the request in the appeal case. Paragraph 19 of the Secretary of State's decision states:

*'The Secretary of State has also considered the S106 Planning Agreement in respect of Appeal A submitted by the main parties at the inquiry and, like the Planning Inspector, he is satisfied that the provisions can be considered compliant with CIL Regulation 122 and paragraph 204 of the Framework and that full weight in support of the appeal proposal can therefore be given to the obligations.'*

Suffolk Constabulary can only emphasis its desire to work with SCDC, when ensuring that the adequate level of policing is maintained. To this end, Suffolk Constabulary would appreciate the opportunity to meet with SCDC and ensure that the appropriate planning documents do reflect the need for contributions towards policing.

#### **I wish to be heard at the public hearing by the examiner**

Unless Suffolk Constabulary is confident that SCDC has taken the necessary measures to ensure that policing is considered on an equal footing as other key service providers i.e. Health, Education and Libraries, then Suffolk Constabulary will wish to be heard by the examiner.

The purpose of being heard by the examiner would be to ensure that policing has been included when calculating CIL rates. If this is not the case, then the Constabulary needs to understand how evidence submitted by other parties, when compared to that of policing, has warranted its inclusion.

**Leigh Jenkins**

**Business Liaison Manager, Suffolk Constabulary, 17<sup>th</sup> November 2014**

**Appendix B  
needs**

**Suffolk Constabulary – breakdown of**

## STAFFING COSTS

The following table shows the current staffing levels for SCDC, the area of the proposed Eastern Ipswich Plan Area development.

Staff Type	Current Staffing Level	Increased staffing level (based on growth of 4,800 population)
SNT Officers	25	1
SNT PCSOs	34	1
Response Officers	50	2
Other Officers pro-rated (incl. CID and other specialist teams)	115	4
<b>Total officers</b>		<b>8</b>
Police staff for SCDC pro-rated	165	6
<b>Total staff</b>		<b>6</b>

### Officers and Staff Set-up Costs

Additional Officers	Approx. set-up cost per officer	Pro rata requirement for 8 officers
Recruitment	£1,060	£8,480
Training	£4,400	£35,200
Uniform & Personal equipment	£940	£7,520
Standard equipment (ICT and furniture)	£1,642	£13,136
<b>Total costs</b>	<b>£8,042</b>	<b>£64,336</b>

Additional central support services	Approx. set up cost per member of staff	Pro rata requirement for 6 staff
Recruitment	£1,060	£6,360
Standard equipment (ICT and furniture)	£1,642	£9,852
<b>Total costs</b>	<b>£2,702</b>	<b>£16,212</b>

<b>TOTAL</b>		<b>£80,548</b>
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Source: SC Finance/HR and ICT

The costs shown above are reflective of the costs as at the time of this information being submitted (April 2014). These are however subject to change and will be recalculated at the point of planning permission being submitted.

**PREMISES COSTS**

ADASTRAL SAFER NEIGHBOURHOOD TEAM AND PUBLIC ACCESS POINT						
PRESENT LOCATION:		None			DATE: 19.03.2014	
1. Please enter figures in the boxes indicated with a bold blue zero where appropriate. The floor space required will then be calculated for you.						
PROPOSED LOCATION:		BT Adastral Park			COMPLETED BY:	CR
Staff Type	Current People Numbers	Estimated Daily Occupancy	Desks	Notes on assessment and type of room proposed	SQ M Each Desk	Total SQM
<b>CPC REQUIREMENTS</b>						
Inspector	1	1	1	In open plan office	5	5.00
Specials	4	0	1	In open plan office	5	5.00
SNT Sergeant	2	1	1	In open plan office	5	5.00
SNT Constable	14	6	4	In open plan office	5	20.00
PCSO	5	2	1	In open plan office	5	5.00
Station Clerks	1	1	1	In Public Enquiry Office	5	5.00
Admin Clerk	1	1	1	In open plan office	5	5.00
Future additional staff numbers (Hot Desk visitors)		1	1	1	5	5
<b>REQUIREMENT</b>	<b>29</b>	<b>13</b>	<b>11</b>			<b>55.00</b>
Other Space Type	Space Required	Number Required	SQ M PER ITEM	TOTAL SQ M	SITE REQUIREMENTS	
PEO Reception		1	15.00	15.00	Staff CP	5
Meeting/Interview Rooms	PEO	1	13.00	13.00	Parking	4
ICT - Server/Comms Room	5 SQ M per cabinet	1	5.00	5.00	Staff Bike Parking	5
Rest Room/Kitchen	Number of seating in kitchen area	1	20.00	20.00	Ops Bike Parking	5
Toilets and Showers	Daily capacity number for male and female	2	15.00	30.00		
Disabled Toilet + shower (wet room)	1 toilet	1	5.00	5.00		
Lockers & Equipment	No of all staff requiring lockers and equipment hangars	30	0.50	15.00	Salt Bin Areas	2
Cleaners Cupboard		1	5.00	5.00	Waste Bin Areas	1
Internal Store Cupboard		1	5.00	5.00		
External Store		1	10.00	10.00		
Plant room/Boiler Room		1	5.00	5.00		
Drying Room		1	5.00	5.00		
PSE Stores (Main, Temp & Drugs)		1	5.00	5.00		
Circulation space- stairs/corridors 20% of total space			40.00	40.00		
					MISC	Any other special requirements
<b>TOTAL OTHER SPACE REQUIREMENT</b>				<b>178.00</b>		
<b>TOTAL COMBINED SPACE REQUIREMEI</b>					<b>233.00 SQ M</b>	
					<b>2508.01 SQ FT</b>	

The above is based on an all-inclusive build cost of £2,500 per square metre, which equates to a total build cost of **£582,500**.

Although a specific building design has not been completed at this early stage of planning it is suggested that this additional accommodation would be developed within the existing SC estate at Force Headquarters Martlesham.

This would afford the appropriate access to the current and emerging community, and also negate the acquisition and so cost of land purchase.

**COST OF VEHICLES**

The current vehicle fleet ratio is 2.4 officers to 1 vehicle, as previously mentioned there is no spare capacity within the existing fleet to absorb the additional needs of posts that will be required to police the additional activity resulting from development in the Eastern Ipswich Plan Area.

Vehicle costs have been capitalised on 5-year lifetime average costs for a low/medium size equipped vehicle (excluding fuel).

On the basis of an additional 8 officers in the territorial policing and protective services, it is calculated that there will be a requirement for an additional 3 vehicles.

Additional vehicles and bicycles	Cost per Vehicle	Total cost for planned growth
3 vehicles(incl.livery and emergency equipment)	£28,161	£84,483
<b>Total cost</b>		<b>£84,483</b>

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