



Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy GR11 & IDP Emergency Services (Police)	Policy	GR11 (Planning Obligations) In reference to Evidence Base Document: Infrastructure Delivery Plan (IDP, 2024)	Policies Map	N/A
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4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

4.(2) Sound

4.(3) Complies with the Duty to co-operate

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Introduction

The Metropolitan Police Service (MPS) considers that the LB Harrow Draft Local Plan and Infrastructure Delivery Plan ('IDP') are unsound, as they fail to identify MPS policing requirements as a legitimate infrastructure requirement for Section 106 contributions. The MPS is concerned with the wording of the IDP, which is referenced in the Local Plan Policy GR11, under the subtitle 'Emergency Services' and subcategory 'Police'.

The MPS previously submitted representations to the LB Harrow IDP consultation in September 2024, which state similar points to these Regulation 19 representations.

The Plan proposes a significant amount of development which has an impact on policing in the Borough that needs to be mitigated.

Draft Strategic Policy 03 (Meeting Harrow's Housing Needs) proposes a minimum of 16,040 net homes in LB Harrow between 2021/22 and 2040/41. There would also be growth in commercial floorspace. This will give rise to the need for additional policing infrastructure which will need to be funded. The MPS believes that Section 106 contributions should be levied for this purpose and that the Local Plan should acknowledge this, together with the IDP and any Section 106 Supplementary Planning Guidance.

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 Section 106 agreements. A number of policing authorities have sought legal advice on this issue and received confirmation of this. We consider that the wording within the Emergency Services section within the IDP (as referenced by Draft Policy GR11) to be unsound, because of the following:

- MPS policing requirements are not set out as a legitimate S106 infrastructure requirement within the IDP or Draft Local Plan, which provides very little clarity to either the MPS or developers on what the S106 charging requirements are. While Draft Policy GR11 does state that "*where new development requires a bespoke mitigation to make a scheme acceptable the Council may enter into a S106 agreement*", we consider this to be insufficient. The MPS's policing requirements are not subsequently listed as a potential requirement under supporting paragraph 2.11.4, within the IDP, or within the Planning Obligations & Affordable Housing SPD (2013). The MPS therefore strongly recommends that wording which provides further clarity to developers and the MPS that policing infrastructure is a legitimate S106 charging item; that would need to be met through Section 106 contributions be implemented preferably into the Local Plan, or in the IDP.
- We are also supplying updated details regarding the 'Current Provision' section under the Emergency Services chapter in the IDP, to ensure that it remains up to date.

Should the Plan fail to provide further clarity on the S106 infrastructure requirements for policing, the MPS has concerns for the provision of funding to provide required infrastructure as the proposed lack of clarity is not considered to be sound. As such, we consider the Plan would be unsound on the basis of the above.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Section 106 Contributions Sought

MPS are seeking Section 106 charges to offset the cost of policing infrastructure, based on a charging methodology used widely by other police forces and already tested at appeal and in the courts. A calculator has been produced which assesses these charges, based on the standard methodology. Section 106 contributions have been agreed in other London Boroughs based on this approach.

There is also a significant requirement for neighbourhood bases in LB Harrow, which is increased by large schemes. As such, the Local Plan must make it clear that S106 contributions will be sought from developers on these schemes to help meet this need.

The MPS is seeking the below wording should be included within the IDP, as set out under each subtitle. The proposed wording set out below has been adopted by other London boroughs already, for example in Waltham Forest.

(the below wording to update the information within the Emergency Services table under 'Current Provision' under the 'Police' subtitle)

At present there are two Police Stations within the borough, with an additional three Neighbourhood teams as follows:

- Harrow Police Station.
- Pinner Police Station.

In addition to the above, the Police also have Neighbourhood bases in the community, which are currently located at:

- 1 Headstone Drive, Wealdstone;
- Centenary Park Pavillion, Culver Grove; and
- 155 Uxbridge Road, Hatch End.

Future Requirements

Neighbourhood Offices

The Metropolitan Police Service requirements in LB Harrow are shown in the below map, identifying wards where there is a requirement for a new police base. Whilst two Police Stations and three Neighbourhood Offices are currently functioning in the borough, there is a need for additional Neighbourhood Police Offices, particularly in locations where the nearest office is over twenty minutes away. Wards where Neighbourhood Office Space are likely to be required are mostly located toward the North East and West of the Borough as shown below:

List of Wards where Neighbourhood Office Space is Likely to be Required

- 1) Pinner Ward
- 2) Pinner South Ward
- 3) Belmont Ward
- 4) Cannons Ward
- 5) Stanmore Ward

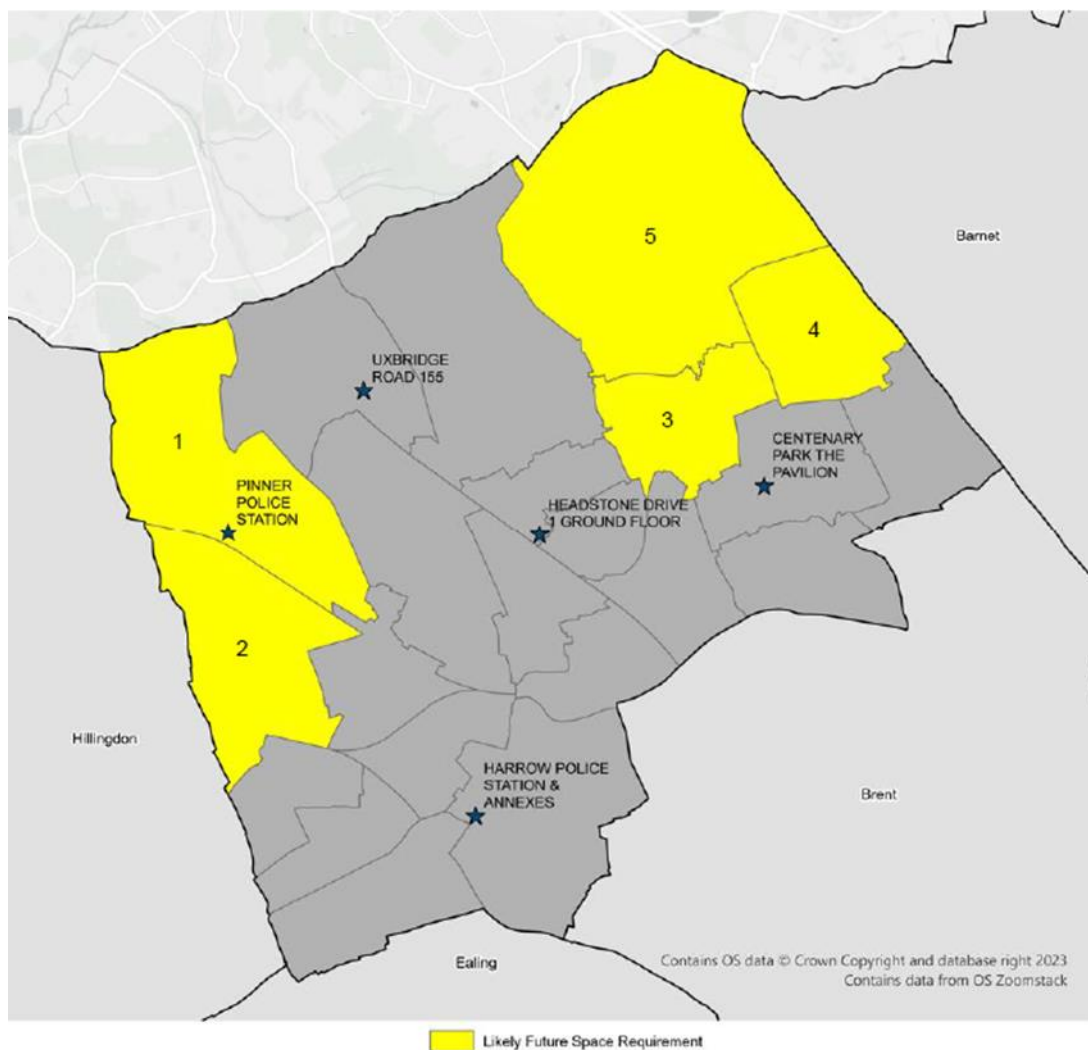


Figure 1 – Map highlighting existing MPS Offices and locations where a new office base is required

Section 106 Financial Contributions

There is a shortfall in funding for the required police offices and significant development places additional pressure on policing infrastructure in the borough. As such, where developments are of a sufficient scale, section 106 agreements will be used to secure appropriate improvements in neighbourhood police office provision. Some developments will be sufficiently large to give rise to the need for a new police office within the proposed development. In these cases, there will be an expectation for a new police neighbourhood office to be provided on site at peppercorn rent and the fit out costs covered.

It should be noted that the Metropolitan Police Service has developed a model for defining a proportionate level of contribution towards the policing resource generated by new development and will likely seek contributions using this model for development proposals that are referable to the Mayor of London. Areas for use of contributions that have been identified include staff set up costs, vehicles, mobile IT, Police National Database (e.g. licences, IT and telephony) and the provision of police accommodation.

Applicants proposing referable schemes are encouraged to engage with the Metropolitan Police Service at the pre-application stage to help understand the amount likely to be sought through this modelling and any specific policing infrastructure that might be sought within the scheme itself.

End of proposed wording.

Ideally, the MPS S106 infrastructure requirements would be included within the Plan itself, however we consider the existing structure referencing the IDP is acceptable should the above wording be included.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.