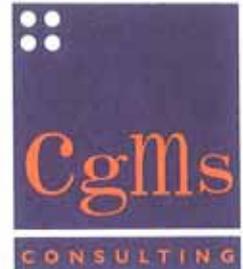


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6th April 2010

Dear Sirs

**REPRESENTATION ON BEHALF OF
METROPOLITAN POLICE AUTHORITY
CORE STRATEGY PROPOSED SUBMISSION VERSION**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the Proposed Submission Version of the Core Strategy. The MPA's estate is currently evolving to better meet the needs of current policing. Initially I refer to the context of our representations, then acknowledge the established planning policy framework supporting the provision and development of policing, as set out in CgMs' previous representation letters of 1st August 2007 (Preferred Options) and 3rd April 2009 (Core Strategy Options Report) (both enclosed). While a number of our representations were incorporated within the previous draft document, some still remain outstanding.

Context to Representations

CgMs, together with representatives of the MPA met senior officers in both the planning policy and development management teams in January 2006. This was followed up through the submission of representations on behalf of the MPA during the previous round of consultation regarding the Core Strategy in April 2009 – the Preferred Options stage. CgMs have also been discussing the implications of the Council's Infrastructure Plan with regard to policing throughout 2009. It is anticipated that where appropriate these comments will be taken into account during this review. I attach a copy of our representation letter dated 3rd April 2009 for reference.

I draw your attention in particular to the policy background which supports the provision of policing. It is essential to ensure that the LPA understand the planning policy background which supports the MPA's representations. Provision for policing and supporting the MPA's objectives is a key strategic requirement in order to ensure that safe and secure communities are developed across the Borough of Lewisham. I do not believe the Core Strategy Proposed Submission reflects this requirement at this stage.

I therefore provide a synopsis of relevant Government Guidance and Planning Policy immediately below (full details referred to in CgMs' letter of 25th May 2008 where relevant), before referring to the MPA Estate Strategy and then addressing specific policies within the emerging Core Strategy, mindful of the context.

Relevant Planning Policy

National & Strategic Policy

- PPS1 - paragraph 27 (iii) development plan preparation the need to promote communities which are healthy, safe and crime free is confirmed.
- PPS12 - requires emerging development plan policy to be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy.
- Adopted London Plan (2008) – Policies 3A.17, 3A.18, 3A.26, 3B.4, 4B.6 and supporting text ref 3.99 support the provision of relevant social infrastructure, which specifically refers to policing within its definition.
- Emerging London Plan (2009) – further reinforces the need for adequate policing facilities across London within Policies 2.6, 2.13, 2.15, 3.17, 4.4, 4.6, 7.3 & 7.13.

Local Policies

Policy IRM 3 of the Lewisham UDP refers to Community Benefit and Planning Loss, and states: '*where appropriate the Council will expect planning applications for built development to include proposals which'... 'deal with the fair and reasonably direct and indirect infrastructural requirements of the development'.* In line with circular 05/05 the MPA envisage that major developments may come forward in the borough which will have a direct impact on policing and for which increased police provision will be required.

The planning policy framework as outlined above provides the basis for the inclusion of policing facilities in S106 agreements which provides a direct link between development and its impact on policing.

Background to MPA Estate Strategy

CgMs previously set out the review of the MPA Estate Strategy in our representation letter dated 3rd April 2009. The need for additional police facilities is highlighted in the Metropolitan Police Estate's draft Asset Management Plan (AMP) for Lewisham. Section 10 of the draft AMP for Lewisham gives a full summary of police requirements in the borough. The ultimate aim of the revised strategy is to ensure policing can be delivered more effectively than at present. The Asset Management Plan for Lewisham confirms that this will be achieved through the provision of: (i) Police Shops, (ii) Neighbourhood Policing Facilities, (iii) A Patrol Base, (iv) A Custody Centre and (v) Specialist pan-London Facilities where appropriate. This will assist in ensuring that safe, secure and sustainable neighbourhoods and communities can be created across London. In order to facilitate this, planning policy at the local level must reflect relevant policies supporting policing in the strategic development plan.

Mindful of this context I now turn to CgMs' representations on behalf of the MPA and make recommended alterations where necessary. It would be useful if the Council and the MPA can agree the proposed alterations in respect of policing and in advance of the EiP. This would ensure that the emerging Core Strategy reflects strategic development plan policy in respect of policing and would free-up time for alternative matters at the EiP.

The MPA's Requirement

The MPA are mindful that significant additional development is likely to come forward in Lewisham, through the introduction of new uses and the intensification of existing uses. In addition it is important that the Core Strategy when adopted provides as much support as possible to the MPA and their aim to achieve their estate strategy in order to ensure a safe and secure environment.

In light of the policy framework and the police requirements outlined above the MPA wish to make the following comments and recommendations.

Section 2.8 - Community

Paragraph 2.55 refers to policing. The MPA feel that the Core Strategy, as the overarching policy document in the LDF, should have a greater focus on policing, safety and security particularly as PPS1 emphasises that Councils should prepare plans which promote safe communities. Further, the 2008 Adopted London Plan states within Policy 3A.18 that 'Policies in DPDs should assess the need for social infrastructure and community facilities, and ensure that they are capable of being met wherever possible'. The policy then goes on to define social infrastructure and specifically refers to 'policing' within this.

Recommendation: - It is therefore recommended that the following wording is added to reflect the MPA's objective and efforts to ensure a safe and secure Lewisham (additional wording in bold and italics):

Lewisham has generally had lower levels of crime than most of the other inner London boroughs, although the fear of crime is a key issue. ***At present there are 860 police officers and support staff based in LB Lewisham. They are currently located in five police stations and two neighbourhood police facilities across the borough.***

The MPA have outlined a strategic plan for the modernisation and development of their estate within the Lewisham Asset Management Plan. It is envisaged that the police estate will eventually comprise the following:

- ***Local neighbourhood policing facilities***
- ***Appropriate facilities to enable the public better access to police services***
- ***Custody Centre***
- ***Patrol Base***
- ***Office facilities***

Section 4B - Community well-being

This section states that 'safe and secure environments will be created at design stage and built into any proposal'. It is recommended that this section is altered

to include reference to Secured by Design Principles. The MPA recognise these principles as providing a good standard of design guidance which, when adhered to, helps create safe and secure environments.

CS Policy 3 Strategic Industrial Locations and Local Employment Locations

The alteration of this policy to allow 'appropriate sui generis uses in both Strategic Industrial Locations and Local Employment Zones is welcomed. The MPA request that this alteration is maintained in the final version of the plan.

CS Policy 10 Managing and Reducing the Risk of Flooding

The MPA support the principle of this approach set out in CS Policy 10, however recommends that paragraph 1 be amended to make reference to PPS25 Practice Guide (December 2009). Paragraph 4.76 of the Practice Guide refers to Table D2 of PPS25 and states that emergency service facilities which are not required to be operational during flooding can be appropriately located in Zone 3 if required.

Mindful of this context and in order that the emerging Core Strategy is consistent with Government Guidance, the MPA recommend that an amendment to Paragraph 1 is made.

Recommendation: The MPA recommend that paragraph 1 be amended to read (additional wording bold and italics):

The Council will use the requirements detailed in PPS25 (***and associated Practice Guide***) and the London Plan while at the same time implementing the spatial planning and development control recommendations...

CS Policy 14 Sustainable Movement and Transport

The MPA support reference to point (3) within CS14 which states that the LPA will adopt an managed and restrained approach to car parking provision... while protecting the operational needs of major public facilities...'

The MPA Asset Management Plan for Lewisham identifies the potential for additional policing facilities to be provided to meet changing operational needs. Such facilities require good vehicular access mindful that operational car parking for policing serves an essential local need which forms a key component of a successful, sustainable and safe community. It is considered that emerging CS Policy 14 potentially reflects the operational needs of the MPA, however further clarification in this regard should be pursued through future 'Development Management Policies' document (or similar). This will ensure that the local development plan will reflect strategic policies and government guidance.

CS Policy 19 Provision and maintenance of community and recreational facilities

Representations were previously made for the inclusion of 'policing' in this policy within the list of community facilities. This has not been included in this version of the document and therefore the emerging core strategy fails to fully reflect the strategic Development Plan, as required by government guidance. Planning

Policy Statement (PPS 12) requires within paragraph 4.52 that emerging development plan policy be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy. In this regard, the London Plan is relevant. Policy 3A.18 includes policing in the definition of community facilities and Policy 3A.26 highlights the importance of 'ensuring communities benefit from development including through Section 106 agreements' and improving safety and security. Further, Policy 6A.1 (The Mayor's own powers and resources) states that 'The Mayor will ensure that the policies and resources of the GLA group promote the implementation of this plan'. The GLA group includes the MPA, and the subtext to the Policy states that the MPA has a 'critical role in delivery and can influence safety and security throughout London.' In order to fully implement this, an appropriate borough level policy platform which supports policing is essential.

Recommendation: - In order to ensure the LDF reflects the strategic development plan it is recommended that the following minor alteration is made (additional wording in bold and italics): -

1. The Council will work with its partners to ensure a range of health, education, **policing**, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. The work of the Lewisham Infrastructure Delivery Plan and the relevant corporate plans and strategies of partners will be used to inform provision.

In addition, the MPA support the criterion listed within Point 2 of CS Policy 19 regarding the provision and management of community facilities (and therefore, policing) and wish to see these retained in the final draft of the Core Strategy.

Strategic Site Allocation 4 Oxestalls Road

The MPA Property Services Department have indicated that development at this location at the scale proposed will have implications for the MPA's resources in seeking to ensure a safe and secure environment is created.

The promotion of policing facilities at this location is supported by national, regional and local policy. Of note PPS1 states in paragraph 23 that Planning Authorities should 'ensure that infrastructure and services are provided to support new and existing economic development and housing'. Similarly Policy 3A.18 of the London Plan states 'Policies in DPDs should assess the need for social and community facilities in their area and ensure that they are capable of being met wherever possible. These include', among others, 'policing'. Policy 3A.26 also highlights the importance of 'ensuring communities benefit from development including through S106 agreements' and improving safety and security. At a local level, Strategic Policy STR.LCE1 of the saved UDP states that the Council will ensure that there are sufficient education and community facilities to enable the Council, and other protective and public authorities to meet their statutory obligations and duties'.

In light of the above, it is recommended that the following wording is added below point 1e of Strategic Site Allocation 4 Oxestalls Road (additional wording in bold and italics):

- f. **promotes a safe and secure environment in the area through accordance with Secured by Design Principles and the provision of***

***a Community Policing Facility for the Metropolitan Police Authority,
as appropriate.***

The alterations suggested above are of a minor nature but will assist with the delivery of the MPA estate strategy and ultimately provide an enhanced and more efficient policing service to the borough.

It is anticipated that the needs of the MPA will be included in the final version of this document. Should you have any comments or queries please contact either Brian Coughlan or me to discuss them further.

Yours faithfully



Alun Evans
Senior Associate Director

cc: Metropolitan Police Authority

Encl: Representations to the Core Strategy Preferred Options, 1st August '07
Representations to the Core Strategy Options Report, 3rd April '09

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1st August 2007

Dear Sirs

CORE STRATEGY, DEVELOPMENT CONTROL POLICIES AND SITE ALLOCATIONS – PREFERRED OPTIONS REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE AUTHORITY

I write on behalf of our client, the Metropolitan Police Authority (MPA) with regard to the above consultation document.

Representatives of the Metropolitan Police Service's Property Services Department and CgMs met with Pete Smith, Brian Regan and Rosemary Duckworth of the Council's Planning Team on 24th January 2006 to discuss the planning policy implications of the recent changes to the MPA's estate strategy. At this meeting the changes which are occurring to the MPA's operational estate, as expressed by their Property and Estates Strategy '*Building Towards the Safest City*' and planning policy document '*Planning for Future Police Estate Development*', were discussed. The '*Planning for Future Police Estate Development*' document has been recently updated and is now replaced by '*Property for Policing – Providing the Best Estate for Borough Based Policing*'. A copy of this document is appended to this letter.

The need for changes has arisen as number of existing police stations pre date 1935 and do not meet the operational requirements of the police. Secondly, London is constantly changing resulting in the need to respond to areas of future population growth and shifting demographic and crime patterns. In response to these issues, the MPA have reviewed the delivery of their operational facilities and concluded that today's policing is better suited to:

- Police patrol bases in warehouse units or business parks. All Borough patrolling functions will be centralised in a single location where officers will report at the start of their shift before moving out across the Borough on patrol. Patrol bases need to be located in locations with good accessibility to the road network;



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- Custody centres located strategically throughout London, which will provide all Borough custody facilities in a single location;
- A number of police 'shops' providing public interface facilities in readily accessible locations such as main shopping areas, schools, libraries and hospitals. Several police 'shops' could be required in Lewisham;
- Safer Neighbourhood Teams which operate from a base comprising office accommodation from which Teams patrol Wards on foot and bike. It is intended that one Safer Neighbourhood Team will serve each Ward. One or more Teams could share office accommodation;
- Other specialist operational facilities.

Lewisham is unique in London terms due to the relatively recently constructed Police Stations in Lewisham Town Centre. This was constructed in the early part of the 2000s under the Private Finance Initiative. This adequately provides the Borough's patrolling and custody functions. Accordingly the MPA's estate priorities for the Borough will focus on police 'shops', SNTB, specialist operational facilities and the potential disposal of any old style police stations.

The MPA believe it is essential the planning policy implications of the MPA's revised estate strategy and operations are taken into consideration in the preparation of the Council's Local Development Documents. The MPA are mindful that the Preferred Growth Option for Lewisham in the Core Strategy envisages the building of 9,750 additional homes. This will have significant implications for the policing of Lewisham. Within this context the MPA have a number of specific comments regarding the Preferred Options Documents.

Core Strategy

The Spatial Vision and Strategic Objectives

The MPA support the strategic commitment at Section 4.2 to ensuring '*Lewisham's places and spaces created are accessible, safe, attractive, promote healthy lifestyles, and are the best in London*'.

The MPA also support the Council's strategic objective at Section 4.3 to create a built environment that is well designed, safe and accessible to everyone and to achieve equalities and social inclusion by creating '*healthy communities through the adequate provision of educational, community and leisure facilities and services that area accessible to everyone*'.

Policy CP12 Provision of Health, Education and Community Facilities

Policy CP12 states that the Council will work in partnership with the relevant providers to ensure there is an adequate provision of health, education, community, leisure, arts, cultural, entertainment and sports facilities. The MPA are mindful that the list of community facilities which are sought to be addressed by the policy is not exhaustive. However, due to the importance of the delivery of effective policing the MPA recommend the range of community facilities should be extended to include police facilities.

Policy CP17 Promoting Good Design – Development in Context and Density of Development

Policy CP17 promotes good design in new development and ensures new development contributes to the reduction of crime and fear of crime. The MPA request this policy to encourage developer to incorporate *Secured By Design* principles and the ODPM Publication *Safer Places – the Planning System and Crime Prevention* from the conception of development schemes.

Policy CP26 Strategic Employment Locations and Local Employment Locations

Policy CP26 seeks to safeguard the Strategic Employment Locations and Local Employment Locations as the prime locations for uses within the Class B. As a result of review of the MPA's estate strategy there may be potential need for the development of specialist operational facilities within Lewisham. Typically such facilities operate 24/7 and require good accessibility to the local road network. In other London Boroughs these facilities have been introduced in employment areas. The Council's policies for allocating employment land for future development should take into account this potential need. The MPA therefore recommend the policy is amended to read as follows:

'Operational police facilities are considered acceptable uses within Main Employment Areas due to employment density levels and the nature of the use'.

Development Control Policies

Policy E19 Other Employment Sites

Policy E19 permits other uses outside Class B in Other Employment Sites, including a) office accommodation; b) doctor and dentists surgeries and other similar premises; c) retail premises where the building/site is suitable; d) residential development where surrounding uses are residential. As noted above the MPA may require the introduction of a specialist operational facility within the Borough. At this stage no specific location has been identified, although warehouse uses/sites within Council's employment areas area likely to be the most appropriate locations for patrol bases. The MPA therefore suggest Policy E19 is amended to enable sui generis uses such as operational police facilities within Other Employment Sites.

Policy RTC2 Types of uses in Core, Non-Core and other Shopping Areas (Excludes Lewisham and Catford Town Centres)

Policy RTC2 allows community service uses (including GP surgeries, veterinary surgeries, dentists and other similar uses) in non-core shopping areas. The MPA recommend the range of appropriate uses should be extended to allow the introduction of other Class A2 uses, such as police 'shops' which will contribute positively to the vitality and viability of town centres.

Policy HEC3 Social and Economic Impact Assessment

Policy HEC3 states that the Council will require a social and economic impact assessment to accompany all major development proposals. If a need for improved or additional health, education or community facilities is identified, the Council will secure adequate provision through planning obligations or conditions

on planning permissions. The MPA welcome the recognition that major developments should make provision for facilities which create new demands on services and suggest the policy should incorporate police facilities.

I trust that these comments will be taken into account in the formulation of the Council's Core Strategy and Development Control Policies. Please do not hesitate contact either Katie Ng or myself if you have any queries or require any further information.

Yours faithfully

Matthew Roe
Director

Enc.

c.c. Metropolitan Police Authority

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3 April 2009

Dear Sirs

REPRESENTATION ON BEHALF OF METROPOLITAN POLICE AUTHORITY

CORE STRATEGY OPTIONS REPORT

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above Core Strategy Options Report. The MPA's estate is currently evolving to better meet the needs of current policing. Firstly I set out relevant national, regional and local policy followed by the MPA's requirements as set out in the Lewisham draft Asset Management Plan (enclosed). Finally I set out CgMs' comments and recommendations in relation to the options report.

CgMs, on behalf of the MPA made representations at the Preferred Options stage of the Core Strategy by letter dated 1st August 2007. It was recommended that policy should allow for the location of police facilities in employment areas, for police shops to be located in retail frontages, and to allow for the inclusion of policing in S106 agreements from developments of a suitable scale.

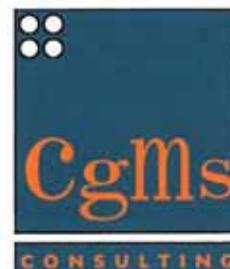
Context to Representations

National Policy

The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities. Also Circular 05/05 paragraph B9 advises developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision which would not have been necessary but for their development.

Strategic Policy

At strategic level, paragraph 3.99 of the London Plan (Consolidated with Alterations since 2004) states '*initiatives relating to policing and community safety and crime reduction are seen as increasingly important in improving the quality of life of many Londoners*'.



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Policy 3A.17 Addressing the needs of London's diverse population states that the diverse populations needs should be met through the general and specific policies relating to the provision of social infrastructure including '*policing facilities*'. This policy has been altered from its original form (policy 3A.14) in the 2004 version of the plan to recognise that the provision of police facilities as defined as an element of social infrastructure.

This is also reflected in Policy 3A.18 which states: '*Policies in DPDs should assess the need for social infrastructure and community facilities in their area, and ensure that they are capable of being met wherever possible. These needs include primary healthcare facilities, children's play and recreation facilities, services for young people, older people and disabled people, as well as libraries, sports and leisure facilities, open space, schools, nurseries and other childcare provision, training facilities, fire and policing facilities, community halls, meeting rooms, places of worship, public toilets, facilities for cyclists, convenience shops, banking facilities and post offices (also see Chapter 3D)*'. Policy 3A.18 further notes that development plan policies should seek to ensure that appropriate facilities are provided and that the net loss of such facilities must be resisted.

Policy 3A.26 also highlights the importance of '*ensuring communities benefit from development including through Section 106 agreements*' and improving safety and security.

Policy 3B.4 Industrial locations highlights the potential of surplus industrial land to help meet the strategic and local need for other uses such as social infrastructure.

The London Plan (Consolidated with Alterations since 2004) defines policing as a material consideration when assessing the impact if significant development upon policing and when formulating relevant development plan policy. It is therefore appropriate to ensure that the needs of the MPA are reflected within the forthcoming Core Strategy.

Local Policies

Policy IRM 3 of the Lewisham UDP refers to Community Benefit and Planning Loss, and states: '*where appropriate the Council will expect planning applications for built development to include proposals which... 'deal with the fair and reasonably direct and indirect infrastructural requirements of the development*'. In line with circular 05/05 the MPA envisage that major developments may come forward in the borough which will have a direct impact on policing and for which increased police provision will be required.

The planning policy framework as outlined above provides the basis for the inclusion of policing facilities in S106 agreements which provides a direct link between development and its impact on policing.

The MPA's Requirement

The MPA are mindful that significant additional development is likely to come forward in Lewisham, through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources, and the MPA request that the impact upon policing be taken into account as a material consideration during the application determination process



and reflected within the emerging development plan. This can be delivered through S106 agreements where these are consistent with the policy tests in Circular 05/05 and therefore should be supported within the emerging core strategy and supporting documents.

Metropolitan Police Estate – Draft Asset Management Plan Lewisham (November 2007)

The need for additional police facilities is highlighted in the Metropolitan Police Estate's draft Asset Management Plan for Lewisham. The MPA recently consulted on this document and a revised document will be available shortly. Section 10 of the draft Asset Management Plan for Lewisham gives a full summary of police requirements in the borough.

In light of the policy framework and the police requirements outlined above the MPA wish to make the following comments and recommendations.

4.13 Core Strategy Vision for Lewisham 2025

The MPA believe that safety, security and policing should be a key priority in Lewisham in the future. An additional section should be added to the text box entitled '*Core Strategy Vision for Lewisham 2025*' to address safety and security and to prioritise these in the adopted version of the Core Strategy. The following wording is proposed (additional wording underlined):

'As outlined in 'Shaping our future - Lewisham's Sustainable Community Strategy 2008 - 2020' the council and the police will work together to:

- Reduce the overall level of crime below the London average;
- Tackle antisocial behaviour and ensure that people feel confident and safe throughout the borough; and
- Keep our children and young people safe from harm, abuse and criminal activity.

Core Strategy Objective 9: Safety

The MPA believe that policing plays an important part in producing safe and secure places. It is recommended that the Core Strategy Objective 9: Safety is altered to reflect this in order to reflect the strategic and national planning guidance. **Recommended alterations:** '*Create safer and stronger communities by reducing crime and fear of crime through innovative design and land use and continued consultation with the Metropolitan Police Authority*'.

Core Strategy Objective 10: Social Infrastructure

Policy 3A.18 of the London Plan includes 'police facilities' as a component of social infrastructure; therefore the MPA request core strategy objective 10 which lists social infrastructure is altered to include policing. **Recommended alteration:** '*Promote the provision of services and facilities such as schools, health, policing, community, sports and recreation facilities, that are accessible to all of Lewisham's diverse residents to foster independent community living*'.

Strategic Spatial Options

In relation to the two strategic spatial options outlined in the document the MPA suggest Option 2 is preferable as it accords with the development levels set out in



table 3A.1 Housing provision in the London Plan. In relation to both options the MPA are keen to ensure that any increase in development is mitigated with an increase in social and community infrastructure, such as police facilities, in line with the policies set out in the London Plan and outlined above.

6.68 Area of stability and managed change

This section states that the Strategic Industrial Location (SIL) and Local Employment Locations (LELs) throughout this area would be retained and protected. This is welcomed as the MPA operate a garage facility located at 34A Aitken Road within the Brockley Road SIL. While the MPA support the protection of the SIL they also recommend the inclusion within the core strategy of a supporting paragraph recognising the potential of surplus industrial land as an appropriate location for community infrastructure, such as policing, in accordance with policy 3B.4 of the London Plan.

Revised Policy wording would read: -

The Metropolitan Police Authority undertook a review of the infrastructure requirements necessary to support the effective policing of the borough in its draft Asset Management Plan (November 2007). The Council will support the provision of new police facilities identified in the plan and elsewhere as relevant, in appropriate locations throughout the borough.

6.9 Infrastructure implications

This section deals with the infrastructure requirements required to support the proposed development. Statement 9 states that the core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, however policing is not referred to. This does not reflect the strategic development plan or our previous representations to the Lewisham Social Infrastructure Framework (letter 2nd October 2008); this document includes a section relating to emergency services incorporating a subsection dealing with policing. In order for a consistent planning policy framework that reflects the strategic development plan an additional section should be incorporated under the sub-heading 'Social' in section 6.111 outlining the proposals within the Lewisham draft Asset Management Plan (enclosed). Proposed wording is as follows:

Recommended Alterations: *'The MPA draft Asset Management Plan for Lewisham outlines the current challenges and seeks to outline the policing facilities required in order to ensure continued appropriate policing.'*

Question 25

Question 25 asks 'Are there any other comments in relation to housing?' The MPA recommend that affordable housing and in particular key-worker housing is provided in line with the London Plan. Key worker housing helps attract and retain key workers in the borough such as teachers, medical staff and police officers. This is a important factor in attracting and maintaining an exceptional police staff.



Option 10 Strategic Industrial Land

This section recommends the retention of areas of land at Surrey Canal Road and Bromley Road as Strategic Industrial Land (SIL). The MPA welcome the retention of these areas as both contain police operational facilities. The MPA also support the retention of SILs do not currently comprise a police use. Policy 3B.4 of the London Plan states that surplus SIL may be used for social infrastructure such as policing. It is recommended that this is reflected within Objective 10, paragraph 6.68 as outlined above.

Question 27 Employment land issues

The MPA are keen ensure that policy allows for surplus employment land to be used for police uses, in accordance with the London Plan and with our representations above regarding Objective 10, paragraph 6.68. This would provide a wider choice of locations for police uses.

Option 21 Local shopping facilities

This section seeks to protect local shopping facilities from change of use or redevelopment where there is an economic demand for such services. The MPA Estate Strategy promotes the use of 'police shops'. Police shops are located in shopping frontages and provide a easy and accessible point of contact between the police and the public. The MPA recommend this policy allows for the potential change of use from retail to police uses in these areas, where appropriate.

7.398 Summary of the issues and options consultation

This section notes that the Metropolitan Police Authority requested that *'the Council's car parking standards recognised that the operational requirements of certain uses dictate car parking needs. This includes certain police facilities'*. The MPA welcome the inclusion of this section and wish to reiterate this representation at this point in the consultation process.

7.480 Overview and summary of issues to be resolved

This section refers to 'emergency services'; the MPA request that in future versions of the document 'emergency services' should expressly include policing.

7.495 Summary of the Preferred Options consultation

It states: *'A consultant acting on behalf of the Metropolitan Police suggested that 'police facilities should be added to the list of community and social infrastructure facilities'*. The MPA wish to reiterate this point in line with London Plan policy 3A.18. Section 7.495 continues: *'There was also overwhelming support for resisting the loss of any existing facility, especially when redevelopment was proposed'*. The MPA wish to strongly recommend that policy does not resist the loss of any existing police facilities. The MPA are currently implementing their estate strategy as outlined in the draft Asset Management Plan which notes that the reconfiguration of the police estate may render some existing facilities surplus to requirements. If the former community use is relocated elsewhere in the locality to a site not previously in community use the following policy wording is required in order to ensure no 'double counting' of the replacement facility exists:



Permission may be granted for the change of use of community facilities where:

- Alternative community facilities providing a similar service are provided locally in the area within which that facility serves; or
- Development would enable the implementation of a strategy for the provision of a community service in the borough; or
- The site is either demonstrably unsuitable for continued use as a community facility.

Option 42 – Community and recreational facilities

The MPA recommend that in future versions of this document the list of 'community and recreational facilities' includes policing. This section states: 'The Council would apply the London Plan Policies relating to healthcare, education and community and recreation facilities to ensure:...' 'There is no net loss of facilities.'

The MPA welcome this section; London Plan policy 3A.18 includes policing in its list of community facilities. In particular the MPA welcome the inclusion of the wording 'no **net** loss of facilities'. This is in line with the MPA's draft Asset Management Plan and would allow loss of outdated, unfeasible, unfit-for-use police properties if they are replaced with improved facilities in the locality.

Consistency with the Sustainable Community Strategy and other council documents

Sections 7.524 to 7.530 outline documents which outline the provision of community facilities and social infrastructure for the borough. The MPA recommend the inclusion of the draft Lewisham Asset Management Plan in this list.

7.4.4 Planning obligations and Community Infrastructure Levy

As a provider of community facilities the MPA are concerned about the blanket use of Community Infrastructure Levy (CIL) model for predicting future police floorspace requirements. Levies tend not to take into account the many factors which affect policing infrastructure need. A variety of pressures impact upon the numbers of officers required within the borough. Several issues such as demographics and socio-economic factors determine the number of officers which are required. The MPA's Estate Strategy reflects these factors and significantly different levels of police officers are needed across the 32 boroughs according to a variety of different factors; the ratio of police officers to population differs greatly between the highest police provision and the lowest within each borough.

The MPA are constantly monitoring their needs in Lewisham and across London and they wish to have the flexibility to respond to policing needs if and when they arise. It is believed that the formula-based approach is too simplistic and doesn't reflect the MPA's estate strategy.

The best way to ensure the delivery of the aims of the draft Asset Management Plan is to influence planning policy and development proposals and to secure the delivery of floorspace and other obligations through S106 agreements. This has proven to be the most successful way of delivering the MPA's estate needs and providing police facilities where they are needed.



Generally Section 106 payments will remain and relate to non-financial, technical or operational matters; site-specific impacts that their development will have on the immediate area; and affordable housing. As a consequence, this should remain in place in relation to policing so as to provide for the MPA's requirements in seeking to realise their Estate Strategy.

This point can also be raised in relation to Option 46; the MPA recommend that Section 106 agreements are retained in the borough for certain uses, one of which should be policing.

It is anticipated that the needs of the MPA will be retained in the final version of this document and the Planning Obligations SPD. Should you have any comments or queries please contact either Brian Coughlan or me to discuss them further.

Yours faithfully



Alun Evans
Senior Associate Director

Encl: Metropolitan Police Estate draft Asset Management Plan – Lewisham – November 2007

cc: Metropolitan Police Authority

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6th April 2010

Dear Sirs

**REPRESENTATION ON BEHALF OF
METROPOLITAN POLICE AUTHORITY
CORE STRATEGY PROPOSED SUBMISSION VERSION**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the Proposed Submission Version of the Core Strategy. The MPA's estate is currently evolving to better meet the needs of current policing. Initially I refer to the context of our representations, then acknowledge the established planning policy framework supporting the provision and development of policing, as set out in CgMs' previous representation letters of 1st August 2007 (Preferred Options) and 3rd April 2009 (Core Strategy Options Report) (both enclosed). While a number of our representations were incorporated within the previous draft document, some still remain outstanding.

Context to Representations

CgMs, together with representatives of the MPA met senior officers in both the planning policy and development management teams in January 2006. This was followed up through the submission of representations on behalf of the MPA during the previous round of consultation regarding the Core Strategy in April 2009 – the Preferred Options stage. CgMs have also been discussing the implications of the Council's Infrastructure Plan with regard to policing throughout 2009. It is anticipated that where appropriate these comments will be taken into account during this review. I attach a copy of our representation letter dated 3rd April 2009 for reference.

I draw your attention in particular to the policy background which supports the provision of policing. It is essential to ensure that the LPA understand the planning policy background which supports the MPA's representations. Provision for policing and supporting the MPA's objectives is a key strategic requirement in order to ensure that safe and secure communities are developed across the Borough of Lewisham. I do not believe the Core Strategy Proposed Submission reflects this requirement at this stage.

I therefore provide a synopsis of relevant Government Guidance and Planning Policy immediately below (full details referred to in CgMs' letter of 25th May 2008 where relevant), before referring to the MPA Estate Strategy and then addressing specific policies within the emerging Core Strategy, mindful of the context.

Relevant Planning Policy

National & Strategic Policy

- PPS1 - paragraph 27 (iii) development plan preparation the need to promote communities which are healthy, safe and crime free is confirmed.
- PPS12 - requires emerging development plan policy to be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy.
- Adopted London Plan (2008) – Policies 3A.17, 3A.18, 3A.26, 3B.4, 4B.6 and supporting text ref 3.99 support the provision of relevant social infrastructure, which specifically refers to policing within its definition.
- Emerging London Plan (2009) – further reinforces the need for adequate policing facilities across London within Policies 2.6, 2.13, 2.15, 3.17, 4.4, 4.6, 7.3 & 7.13.

Local Policies

Policy IRM 3 of the Lewisham UDP refers to Community Benefit and Planning Loss, and states: '*where appropriate the Council will expect planning applications for built development to include proposals which'... 'deal with the fair and reasonably direct and indirect infrastructural requirements of the development'.* In line with circular 05/05 the MPA envisage that major developments may come forward in the borough which will have a direct impact on policing and for which increased police provision will be required.

The planning policy framework as outlined above provides the basis for the inclusion of policing facilities in S106 agreements which provides a direct link between development and its impact on policing.

Background to MPA Estate Strategy

CgMs previously set out the review of the MPA Estate Strategy in our representation letter dated 3rd April 2009. The need for additional police facilities is highlighted in the Metropolitan Police Estate's draft Asset Management Plan (AMP) for Lewisham. Section 10 of the draft AMP for Lewisham gives a full summary of police requirements in the borough. The ultimate aim of the revised strategy is to ensure policing can be delivered more effectively than at present. The Asset Management Plan for Lewisham confirms that this will be achieved through the provision of: (i) Police Shops, (ii) Neighbourhood Policing Facilities, (iii) A Patrol Base, (iv) A Custody Centre and (v) Specialist pan-London Facilities where appropriate. This will assist in ensuring that safe, secure and sustainable neighbourhoods and communities can be created across London. In order to facilitate this, planning policy at the local level must reflect relevant policies supporting policing in the strategic development plan.

Mindful of this context I now turn to CgMs' representations on behalf of the MPA and make recommended alterations where necessary. It would be useful if the Council and the MPA can agree the proposed alterations in respect of policing and in advance of the EiP. This would ensure that the emerging Core Strategy reflects strategic development plan policy in respect of policing and would free-up time for alternative matters at the EiP.

The MPA's Requirement

The MPA are mindful that significant additional development is likely to come forward in Lewisham, through the introduction of new uses and the intensification of existing uses. In addition it is important that the Core Strategy when adopted provides as much support as possible to the MPA and their aim to achieve their estate strategy in order to ensure a safe and secure environment.

In light of the policy framework and the police requirements outlined above the MPA wish to make the following comments and recommendations.

Section 2.8 - Community

Paragraph 2.55 refers to policing. The MPA feel that the Core Strategy, as the overarching policy document in the LDF, should have a greater focus on policing, safety and security particularly as PPS1 emphasises that Councils should prepare plans which promote safe communities. Further, the 2008 Adopted London Plan states within Policy 3A.18 that 'Policies in DPDs should assess the need for social infrastructure and community facilities, and ensure that they are capable of being met wherever possible'. The policy then goes on to define social infrastructure and specifically refers to 'policing' within this.

Recommendation: - It is therefore recommended that the following wording is added to reflect the MPA's objective and efforts to ensure a safe and secure Lewisham (additional wording in bold and italics):

Lewisham has generally had lower levels of crime than most of the other inner London boroughs, although the fear of crime is a key issue. ***At present there are 860 police officers and support staff based in LB Lewisham. They are currently located in five police stations and two neighbourhood police facilities across the borough.***

The MPA have outlined a strategic plan for the modernisation and development of their estate within the Lewisham Asset Management Plan. It is envisaged that the police estate will eventually comprise the following:

- ***Local neighbourhood policing facilities***
- ***Appropriate facilities to enable the public better access to police services***
- ***Custody Centre***
- ***Patrol Base***
- ***Office facilities***

Section 4B - Community well-being

This section states that 'safe and secure environments will be created at design stage and built into any proposal'. It is recommended that this section is altered

to include reference to Secured by Design Principles. The MPA recognise these principles as providing a good standard of design guidance which, when adhered to, helps create safe and secure environments.

CS Policy 3 Strategic Industrial Locations and Local Employment Locations

The alteration of this policy to allow 'appropriate sui generis uses in both Strategic Industrial Locations and Local Employment Zones is welcomed. The MPA request that this alteration is maintained in the final version of the plan.

CS Policy 10 Managing and Reducing the Risk of Flooding

The MPA support the principle of this approach set out in CS Policy 10, however recommends that paragraph 1 be amended to make reference to PPS25 Practice Guide (December 2009). Paragraph 4.76 of the Practice Guide refers to Table D2 of PPS25 and states that emergency service facilities which are not required to be operational during flooding can be appropriately located in Zone 3 if required.

Mindful of this context and in order that the emerging Core Strategy is consistent with Government Guidance, the MPA recommend that an amendment to Paragraph 1 is made.

Recommendation: The MPA recommend that paragraph 1 be amended to read (additional wording bold and italics):

The Council will use the requirements detailed in PPS25 (***and associated Practice Guide***) and the London Plan while at the same time implementing the spatial planning and development control recommendations...

CS Policy 14 Sustainable Movement and Transport

The MPA support reference to point (3) within CS14 which states that the LPA will adopt an managed and restrained approach to car parking provision... while protecting the operational needs of major public facilities...'

The MPA Asset Management Plan for Lewisham identifies the potential for additional policing facilities to be provided to meet changing operational needs. Such facilities require good vehicular access mindful that operational car parking for policing serves an essential local need which forms a key component of a successful, sustainable and safe community. It is considered that emerging CS Policy 14 potentially reflects the operational needs of the MPA, however further clarification in this regard should be pursued through future 'Development Management Policies' document (or similar). This will ensure that the local development plan will reflect strategic policies and government guidance.

CS Policy 19 Provision and maintenance of community and recreational facilities

Representations were previously made for the inclusion of 'policing' in this policy within the list of community facilities. This has not been included in this version of the document and therefore the emerging core strategy fails to fully reflect the strategic Development Plan, as required by government guidance. Planning

Policy Statement (PPS 12) requires within paragraph 4.52 that emerging development plan policy be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy. In this regard, the London Plan is relevant. Policy 3A.18 includes policing in the definition of community facilities and Policy 3A.26 highlights the importance of 'ensuring communities benefit from development including through Section 106 agreements' and improving safety and security. Further, Policy 6A.1 (The Mayor's own powers and resources) states that 'The Mayor will ensure that the policies and resources of the GLA group promote the implementation of this plan'. The GLA group includes the MPA, and the subtext to the Policy states that the MPA has a 'critical role in delivery and can influence safety and security throughout London.' In order to fully implement this, an appropriate borough level policy platform which supports policing is essential.

Recommendation: - In order to ensure the LDF reflects the strategic development plan it is recommended that the following minor alteration is made (additional wording in bold and italics): -

1. The Council will work with its partners to ensure a range of health, education, ***policing***, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. The work of the Lewisham Infrastructure Delivery Plan and the relevant corporate plans and strategies of partners will be used to inform provision.

In addition, the MPA support the criterion listed within Point 2 of CS Policy 19 regarding the provision and management of community facilities (and therefore, policing) and wish to see these retained in the final draft of the Core Strategy.

Strategic Site Allocation 4 Oxestalls Road

The MPA Property Services Department have indicated that development at this location at the scale proposed will have implications for the MPA's resources in seeking to ensure a safe and secure environment is created.

The promotion of policing facilities at this location is supported by national, regional and local policy. Of note PPS1 states in paragraph 23 that Planning Authorities should 'ensure that infrastructure and services are provided to support new and existing economic development and housing'. Similarly Policy 3A.18 of the London Plan states 'Policies in DPDs should assess the need for social and community facilities in their area and ensure that they are capable of being met wherever possible. These include', among others, 'policing'. Policy 3A.26 also highlights the importance of 'ensuring communities benefit from development including through S106 agreements' and improving safety and security. At a local level, Strategic Policy STR.LCE1 of the saved UDP states that the Council will ensure that there are sufficient education and community facilities to enable the Council, and other protective and public authorities to meet their statutory obligations and duties'.

In light of the above, it is recommended that the following wording is added below point 1e of Strategic Site Allocation 4 Oxestalls Road (additional wording in bold and italics):

- f. **promotes a safe and secure environment in the area through accordance with Secured by Design Principles and the provision of***

***a Community Policing Facility for the Metropolitan Police Authority,
as appropriate.***

The alterations suggested above are of a minor nature but will assist with the delivery of the MPA estate strategy and ultimately provide an enhanced and more efficient policing service to the borough.

It is anticipated that the needs of the MPA will be included in the final version of this document. Should you have any comments or queries please contact either Brian Coughlan or me to discuss them further.

Yours faithfully



Alun Evans
Senior Associate Director

cc: Metropolitan Police Authority

Encl: Representations to the Core Strategy Preferred Options, 1st August '07
Representations to the Core Strategy Options Report, 3rd April '09