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3 December 2010

Dear Sirs

**REPRESENTATION ON BEHALF OF THE METROPOLITAN POLICE
AUTHORITY / SERVICE**

CORE STRATEGY - SUBMISSION VERSION

I write on behalf of our client the Metropolitan Police Authority / Service (MPA/S) with regard to the Submission Version of the Lewisham Core Strategy. The MPA's estate is currently evolving to better meet policing needs. Previous representations have therefore been made by letters dated 1st August 2007 (Preferred Options), 3rd April 2009 (Core Strategy Options Report) and 6th April 2010 (enclosed).

Further to these letters and CgMs' conversations with Brian Regan, LB Lewisham Planning Policy Department, we understand that the Core Strategy document submitted to the EiP comprises that consulted upon in April 2010 and an appended schedule of changes, as recommended by LB Lewisham. This is entitled 'Schedule of recommended amendments to the Core Strategy (Proposed Submission Version) to be submitted to the Secretary of State' October 2010.

We have reviewed the schedule of recommended amendments and we note that the majority of our representations on behalf of the MPA/S have been taken on board, either through the April 2010 draft and the schedule of amendments (October 2010). The proposed changes to the document in respect of policing, and as agreed by the Council, are outlined below.

The MPA/MPS support the changes identified in the CS Options Report Draft (April 2010) and those within the Schedule of recommended amendments (October 2010) and recommend that they are incorporated into the adopted version of the Core Strategy.

The proposed schedule of recommended amendments highlights the following alterations: -



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No.	Pg.	Sect	Amendment / proposed change	Reason for change
12	25	Paragraph 2.55	<i>Add the following text at the end of the paragraph:</i> <u>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.</u>	Provides additional information. Responds and incorporates a comment made by the Metropolitan Police Authority (MPA). Representation 172.
44	55	Paragraph 6.69	<i>Amend the second sentence to read as follows:</i> Safe and secure environments will be created at the design stage and built into any proposals <u>and the Council will implement Secured by Design Principles.</u>	Clarification. Responds to a representation made by CGMS on behalf of the Metropolitan Police Authority (MPA). Representation 173
51	62	Paragraph 6.103	<i>Amend second sentence to read as follows:</i> The design of all new buildings and improvements to public spaces will be required to address safety and security issues <u>and the Council will implement Secured by Design Principles.</u>	Clarification. Responds to a representation made by CGMS on behalf of the Metropolitan Police Authority (MPA). Representation 173
55	68	Paragraph 6.131	<i>Amend second sentence to read as follows:</i> The design of all new buildings and improvements to public spaces will be required to address safety and security issues <u>and the Council will implement Secured by Design Principles.</u>	Clarification. Responds to a representation made by CGMS on behalf of the Metropolitan Police Authority (MPA). Representation 173
59	75	4B. Community well-being	<i>Insert the following paragraph before paragraph 6.168</i> The design of all new buildings and improvements to public spaces will be required to address safety and security issues <u>and the Council will implement Secured by Design Principles.</u>	Clarification Responds to a representation made by CGMS on behalf of the Metropolitan Police Authority (MPA). Representation 173
82	96	Core Strategy Policy 10	<i>Amend paragraph 1 to read as follows:</i> 1. The Council will use PPS25 (<u>and associated Practice Guide</u>) and the London Plan while at the same time implementing the spatial planning and development control recommendations of the Strategic Flood Risk Assessment and the Sequential Test in order to:	Clarifies the use of government guidance. Responds to a representation made by CGMS on behalf of the Metropolitan Police Authority (MPA). Representation 175
111	123	Core Strategy Policy 19	<i>Amend paragraph 1 to read as follows:</i> The Council will work with its partners to ensure a range of education, <u>policing</u> , community, leisure, arts...	Ensure consistency with the London Plan. Responds and incorporates a comment made by the MPA. Representation 178

As noted above all recommendations made in the MPA/MPS representation letter dated 6th April 2010 have been recommended for incorporation in the Core Strategy. The MPA/MPS hereby reiterate support for these proposed amendments and those recommended at this current stage. Notwithstanding, there is one representation that has not been accepted by the Council, which I refer to immediately below.

Strategic Site Allocation 4 Oxestalls Road

As outlined in our previous representations to the Core Strategy on 6th April 2010, the MPA/MPS Property Services Department have indicated that development at this location at the scale proposed will have implications for police resources in seeking to ensure a safe and secure environment.

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'.

It is noted that the site is subject to a current application (LPA Ref: DC/09/73189/X). Representations were made by CgMs, on behalf of the Metropolitan Police on 23rd February 2010. In summation, these representations requested:

- that the proposals make appropriate provision for police facilities given the proposals will have a material impact upon policing provision in the local area. Accordingly, any approval should include a commitment to provide appropriate police related facilities in consultation with the MPA prior to the commencement of any development to be secured either by imposition of planning conditions or part of a S106 agreement. We would be prepared to discuss the exact policing requirements direct with the applicant although a development of this scale is likely to necessitate floorspace of approximately 150m.sq to accommodate a neighbourhood policing floorspace. This should be fully DDA compliant and located at ground floor level;
- the floorspace will be required to shell and core fitting and at peppercorn rent for a period of 25 years minimum.
- it is essential that the proposal complies with the security standards detailed in the Secured by Design Scheme.

As a result of these representations, the draft Heads of Terms within the S106 agreement attached to the application includes provision of a police facility under social infrastructure. In order to ensure this floorspace is realised, it is recommended that the Core Strategy also recognises the need for policing facilities in this development.

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 outstanding alteration is minor in 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.

The MPA/MPS welcome the changes which are recommended in the Schedule of Recommended Amendments. It is recommended these proposed changes are realised and the additional representation is taken on board in the adopted version of the Core Strategy. 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