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Planning Policy
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23 April 2012

Dear Sirs

**REPRESENTATION ON BEHALF OF THE MAYOR'S OFFICE FOR
POLICING AND CRIME / METROPOLITAN POLICE SERVICE
LEWISHAM TOWN CENTRE AREA ACTION PLAN – SUBMISSION
VERSION**

I write on behalf of our client the Mayor's Office for Policing and Crime (MOPC) and the Metropolitan Police Service (MPS) with regard to the Lewisham Town Centre Area Action Plan. Previous representations have therefore been made by letters dated 12 October 2005 and 28 September 2007.

We note that a number of comments made at previous consultation stages have been incorporated into the Submission draft. These are welcomed. Having reviewed this version of the AAP, we believe a number of minor points remain to be addressed

The MOPC/MPS response to the Proposed Submission AAP are outlined below.

Policy context to representations

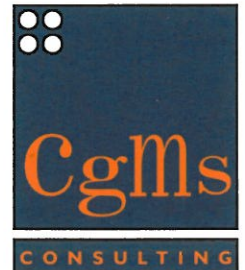
The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community, consistent with planning policy at all levels.

National Policy

- The National Planning Policy Framework (NPPF) (March 2012) – one of the objectives is to deliver the right community facilities to meet local needs (para 70).

London Plan Policies

- *Policy 2.15* recognises police facilities as appropriate uses in town centres.
- *Policy 2.17* includes policing facilities as acceptable uses within Strategic Industrial Locations.



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- *Policy 3.16* requires development proposals to support the provision of social infrastructure and resist the net loss of social facilities. Policing is included within the definition of social infrastructure.
- *Paragraph 3.86* further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.
- *Policy 4.4* highlights the potential for surplus industrial land to help meet social infrastructure need in appropriate locations.
- *Policy 7.3* focuses upon the creation for safe and secure environments and seeks to ensure that developers adhere to the principles of Secured by Design.
- *Policy 7.13* states that Boroughs should work with stakeholders to ensure London remains resilient to emergency and the Subtext states the Metropolitan Police should be consulted as part of major development proposals.
- *Policy 8.2* requires development proposals to address strategic as well as local priorities in planning obligations. Boroughs should set out a clear framework for negotiations on planning obligations in their LDF to ensure that *'it will be a material consideration whether a development makes an appropriate contribution or other provision (or some combination thereof) towards meeting the requirements made necessary by, and relating to, the proposed development.'*

Lewisham Core Strategy

- Section 7.4.1 Community Services and sub section 7.146 include community and emergency services. This is relevant in our assessment of the AAP.

It is clear therefore that a planning policy framework exists at a national, strategic and local level that protects and promotes policing. As such it is important for the relevant policies above to be reflected within the Lewisham Town Centre Area Action Plan.

The MOPC/MPS are mindful that significant additional development is likely to come forward within Lewisham Town Centre as outlined in the document, through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources, and the MOPC/MPS request that the impact upon policing be regarded as a material consideration during the application determination process and reflected within the emerging document. This will ensure the emerging document can be considered 'sound' by having regard to the adopted development plan.

Representations to the Lewisham Town Centre Area Action Plan

As outlined above, it is vital that the Lewisham Town Centre AAP provides support for the MOPC/MPS in order to ensure that Lewisham Town Centre develops as a safe and secure area for both existing and future residents. In order to achieve this, the following specific recommendations are made.

Policy LAAP16 Retail areas

As part of their Estate Strategy, the MOPC/MPS have identified the importance of Police Front Counters in providing an accessible and safe location for the public to interact with police officers. These facilities are best located in areas of high accessibility such as town centres.

The policy allows the provision of community facilities, such as police front counters, in secondary shopping frontages and other shopping areas within the Lewisham Town Centre area. While more flexibility to possibly locate a police front counter within the primary shopping frontage would be welcomed, in light of the existing policing provision and the allowances in the existing draft policy, we wish to support LAAP16 as it stands.

Policy LAAP22 Social infrastructure

Policy LAAP22 deals with the provision of social infrastructure in the AAP area. Policing and policing facilities comprise a key element of social infrastructure, as defined within London Plan Policy 3.16 Provision and enhancement of social infrastructure and supporting text in section 3.86. This details a list of elements of social infrastructure, one of which is 'policing'.

The Council's Social Infrastructure Framework 2008 and subsequent Infrastructure Delivery Plan (As of August 2010) both include Emergency Services and Policing within the definition of community facilities. The adopted Core Strategy further confirms policing comprise the suite of community facility providers in the Borough.

There is clear support, both from the London Plan and from within the Council for the inclusion of policing within the section below. In order to ensure soundness and consistency with other relevant Borough policy it is recommended that part 1 of this policy is amended to refer to policing. Additional wording is in bold:

- 1. The residential and commercial growth of Lewisham town centre will demand provision of additional social infrastructure such as schools, childcare and health facilities, **policing**, and community and leisure spaces.*

The policy also outlines in section 4, the terms under which the redevelopment of existing community spaces will be allowed. This section is welcomed.

It is recommended the additional representation is taken on board in the adopted version of the Lewisham Town Centre AAP. 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: Mayor's Office for Policing and Crime / Metropolitan Police Service