



## **MATTER 4 - ISSUE 1**

**REPRESENTATION NO.  
443**

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### **WRITTEN REPRESENTATIONS TO THE EXAMINATION IN PUBLIC**

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In respect of

**THE LONDON BOROUGH  
OF BARNET'S CORE  
STRATEGY &  
DEVELOPMENT  
MANAGEMENT POLICIES  
DPD**

On behalf of

**METROPOLITAN POLICE  
AUTHORITY/SERVICE  
(REPRESENTOR NO.  
443)**

CgMs Ref: SJ/AE/6355

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## **1.0 PURPOSE OF STATEMENT**

- 1.1 This statement has been prepared by CgMs on behalf of the Metropolitan Police Authority/Service (MPA/S). The MPA/S wish to make further representations in respect of the Council's Core Strategy & Development Management Policies DPD concerning Matter 4 - Issue 1: *'Should other uses be encouraged on business and employment land if they generate employment or deliver other local benefits such as housing?'*
- 1.2 It is considered that Policy DM14 (New and existing employment sites) of the Development Management Policies DPD is unsound because it is not consistent with national policy, nor effective in terms of being flexible to ensure the delivery of infrastructure that would accompany new development, as set out in para 4.33 of PPS12.
- 1.3 This statement details the background to the MPA/S' representations to the Core Strategy & Development Management Policies DPD including an overview of the MPA/S' Estate Strategy. It then demonstrates why part (b) of the Council's draft Policy DM14 (New and existing employment sites) is unsound and subsequently suggests appropriate amendments to ensure soundness.

## **2.0 BACKGROUND TO THE MPA/S' REPRESENTATION**

2.1 MPS Property Services Department (PSD) have been actively involved with the GLA, London Boroughs and other stakeholders in developing a planning strategy to help deliver continued effective policing for London. Through representations on behalf of the MPA/S planning policies across London are now reflecting these positive discussions.

2.2 It is however vital that planning policy continues to reflect the need for the MPA/S to deliver a co-ordinated, sustainable and cohesive pan-London estate strategy to facilitate the delivery of effective policing.

### ***The MPA/S' Estate Strategy***

2.3 The MPA/S is evolving. It is the single largest employer in London, with over 50,000 staff, and by necessity requires a large property estate across the entire Greater London area which includes approximately 900 buildings, ranging from offices, police stations, training facilities and specialist facilities, totalling nearly 1,000,000sq.m.

2.4 This, together with the ever-changing built and social environment in London, places huge demands on the police estate. In response, MPS PSD is taking forward an unparalleled programme of change, with an emphasis on providing a more effective and locally based service delivery.

2.5 The MPA/S have set out a pan-London estate strategy for the period 2010-2014 (**Appendix A**). Essentially, the aim is to modernise the estate to meet current requirements of the police, staff and Londoners alike.

2.6 Currently, police buildings are multi-functional and can include custody, front counters and office accommodation under one roof. This is replicated across each borough. Changes in patterns of crime along with new housing, retail or other developments can mean police stations are not in the most convenient locations for public or police access.

2.7 Accommodation is required that enables a more accessible, flexible and effective police service across London. The estate strategy seeks to rationalise operational

policing facilities into single or dual role functions providing both public facing and non-public facing facilities. These can be defined as follows:

- Public facing facilities - places where the public can make face-to-face contact with police officers in easily accessible locations by public transport or on foot.
- Non-public facing facilities - such as police training facilities, forensic research establishments, vehicle maintenance, custody provision, call centres and office buildings for the MPS business support services.

### ***Implications for the London Borough of Barnet***

2.8 The London Borough of Barnet is expected to experience significant future growth and change. It is therefore essential that the planning policy framework supports the additional infrastructure need, particularly in relation to policing, in line with relevant national guidance and strategic development plan policy, as discussed in the following paragraphs.

### 3.0 MPA/S' PREVIOUS REPRESENTATIONS TO THE CORE STRATEGY & DEVELOPMENT MANAGEMENT POLICIES DPD

3.1 The MPA/S have sought to ensure a collaborative partnership with each London Borough when submitting representations in order to fulfil the planning policy requirements of their estate strategy and operational needs. This is evident by the number of previously submitted representations to Barnet on behalf of the MPA/S regarding the Issues & Options (19/09/2008), Direction of Travel (11/01/2010), Publication Stage (26/11/2010), Preferred Approach (26/11/2010), Pre-Submission Amendments (08/06/2011) and Submission Stage (08/06/2011) of Barnet's Core Strategy & Development Management Policies DPD (all attached at Appendix B).

3.2 The Council has accepted two of the six representations submitted at the previous consultation, as outlined within the table below:

Representations	Policy	Accepted?
Policing facilities specifically identified as appropriate in town centre locations.	CS6 – Promoting Barnet's Town Centres.	Partly - addressed within DMDPD – confirms community use acceptable where A1 use are unviable.
Inclusion of exception criteria to allow policing facilities on Employment Sites.	CS8 – Promoting a Strong and Prosperous Barnet.	No – however policy provides some flexibility by supporting development that encourages existing employment provision.
Include reference to resisting the 'net' loss of community facilities.	CS10 - Enabling Inclusive and Integrated Community Facilities	Partly - addressed within DMDPD –

	and Uses	allows for loss where adequate replacement provision made on-site/ alternative location.
Include reference to support for neighbourhood policing facilities.	CS12 – Making Barnet a Safer Place.	Yes
Impact of developments on policing to be mitigated through planning obligations.	CS15 – Delivering the Core Strategy	Yes
Inclusion of exception criteria to allow policing facilities on Employment Sites.	DM14 – New and Existing Employment Sites.	No <i>Subject to this EIP Statement</i>

3.3 The Council's response notes that not all community uses are suitable uses for industrial estates and therefore it would not be appropriate to include a reference to policing or community facilities within Policy DM14. It is considered that planning applications for community uses within existing employment sites will be determined on an individual basis.

3.4 The provision of policing facilities on surplus industrial/employment sites remains an outstanding issue between both parties. The MPA/S therefore hereby submit further written representations for consideration by the Inspector at the forthcoming Examination in Public.



#### **4.0 POLICY DM14 – NEW AND EXISTING EMPLOYMENT SITES**

- 4.1 The MPA/S sought amendments to emerging Policy DM14 (New and existing employment sites) of the Development Management Policies DPD in order to enable the potential future provision of appropriate policing facilities in designated employment areas within Barnet. This can be achieved by making specific reference to the provision of social and community infrastructure as an acceptable alternative land uses on employment uses.
- 4.2 The nature of these uses are similar to that carried out on most industrial sites and therefore are ideally suited to such locations, which generally possess appropriate accommodation and easy access to the strategic road network.
- 4.3 Whilst falling outside the 'B' class definition, policing uses suited to employment/ industrial land are employment generating and contribute to employment capacity. Generally the policing uses represent no material external change from an Employment (B1) or Warehousing (B8) use, they also possess an employment density similar to or in excess of 'B' class uses and can operate from warehouse type industrial buildings.
- 4.4 Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres.

## 5.0 SOUNDNESS

- 5.1 When assessing Policy DM14 (New and existing employment sites) against PPS12's '*tests of soundness*' it is clear this policy is found to be unsound because it is not effective, defined as deliverable, flexible and able to be monitored (PPS12 paragraph 4.42), nor consistent with national policy (as required by PPS12 paragraph 4.52). The policies which the Development Management Policies DPD is not considered to be consistent or in general conformity with are set out below.

### *Planning Policy Statement 1 – Delivering Sustainable Development*

- 5.2 Paragraph 23 states that planning authorities should '*ensure that infrastructure and services are provided to support new and existing economic development and housing*'. Further, paragraph 27 (iii) (Delivering Sustainable Development), '*in preparing development plans, planning authorities should seek to: promote communities which are healthy, safe and crime free...*'

### *Planning Policy Statement 4 – Planning for Sustainable Economic Growth*

- 5.3 Paragraph 4 states that '*economic development includes development within the B Use Classes, public and community uses and main town centre uses. The policies also apply to other development which... provides employment opportunities*'. Policy EC10 requires local planning authorities to '*adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably*'.

- 5.4 The following are considered material considerations:

### *Crime and Disorder Act 1998*

- 5.5 The Act was introduced to further the government's aim of '*putting crime prevention at the heart of decision making*'. Section 17 (**Appendix C**) imposes a duty on every police authority, local authority and other specified bodies to consider the prevention of crime and disorder in the exercise of all their functions. Specifically it states: *17(1) Without prejudice to any other obligation*

*imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.*

- 5.6 Planning Inspectorate Note No. 953 (**Appendix D**) states that the subject matter of Section 17 - crime prevention, can be a material consideration for the Inspector in reaching a decision.

*Adopted London Plan (July 2011)*

- 5.7 The following policies demonstrate the Mayor's support for the police and policing requirements. The emerging Core Strategy & Development Management DPD's are required to reflect this policy framework.
- 5.8 Paragraph 2.79 of the London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations.
- 5.9 In addition, paragraph 2.84 of Policy 2.17 (Strategic Industrial Locations) states that '*Policing and other community safety infrastructure may also be appropriate uses in [Preferred Industrial] Locations*'.

*Barnet's Emerging Core Strategy & Development Management Policies DPD*

- 5.10 It is clear that national and strategic guidance acknowledges policing needs as part of the wider social infrastructure requirement. At the local level policing is defined as social infrastructure in the London Borough of Barnet's emerging Core Strategy & Development Management Policies DPD. Emerging Core Strategy Policy CS8 states that the Council will encourage development that improves the quality of existing employment provision. Whilst not a defined employment use, as referred to in Section 4.0 above, specific policing uses are employment-generating and can make a significant contribution to the local economy.

## **6.0 EXAMPLES OF POLICING FACILITIES APPROVED IN EMPLOYMENT AREAS AND POLICY REFERENCES IN OTHER LONDON BOROUGHS**

- 6.1 Similar representations made to other London Boroughs seeking the potential use of surplus employment land for policing facilities have been found sound by Inspectors at other examinations. An example includes adopted Policy DC9 (Strategic Industrial Locations) of the London Borough of Havering's Development Control Policies DPD which states:

*'Police Patrol Bases are considered acceptable uses within Strategic Industrial Locations due to employment density levels and the nature of the use.'*

- 6.2 Policy DCE 1 (Designated Employment Areas) of the London Borough of Merton's Development Control Policies DPD (Preferred Options) states that *'within the Main Employment Areas, planning permission will only be granted for light and general industry, research and development, warehousing and storage, office development, and activities associated with the Metropolitan Police estate development strategy.'*

- 6.3 In terms of physical works on employment land we would highlight that London Borough of Haringey have a Patrol Base facility located on employment land at Quicksilver Place. Temporary planning permission was granted in 2006 for a period of three years and renewed in 2009 for a further period to 2012.

- 6.4 Other designated employment land which contain policing uses with similar characteristics to B class uses include a police facility at Deer Park Road, Wimbledon; a Custody Centre at Windmill Road, Croydon; and a Patrol Base at Great Cambridge Road Primary Industrial Estate, Enfield.

- 6.5 Planning permission was also approved by the London Borough of Hammersmith and Fulham in November 2010 for a specialised police operations base on employment land at Lillie Road. The facility provides office accommodation, storage, training rooms, writing rooms, meeting and briefing facilities, locker and shower rooms and parking for operational vehicles.

6.6 The above examples have all been successfully implemented on existing employment sites.

## 7.0 CONCLUSIONS

7.1 The MPA/S consider that Policy DM14 (New and existing employment sites) of the Development Management Policies DPD is unsound as i) it is not consistent with national policy, specifically PPS1 and PPS4; ii) it is not effective in terms of being flexible to ensure the delivery of infrastructure that would accompany the delivery of any development, as set out in para 4.33 of PPS12; and iii) does not make suitable provision for employment in the interest of the local economy and that of London as a whole.

7.2 The Development Management Policies DPD can be made sound through recognition that policing facilities that do not require public access can be appropriately located on surplus employment/industrial land, ensuring consistency with national and regional policy. This would be achieved through an amendment to part ii of Policy DM14 as set out below (additional wording underlined):

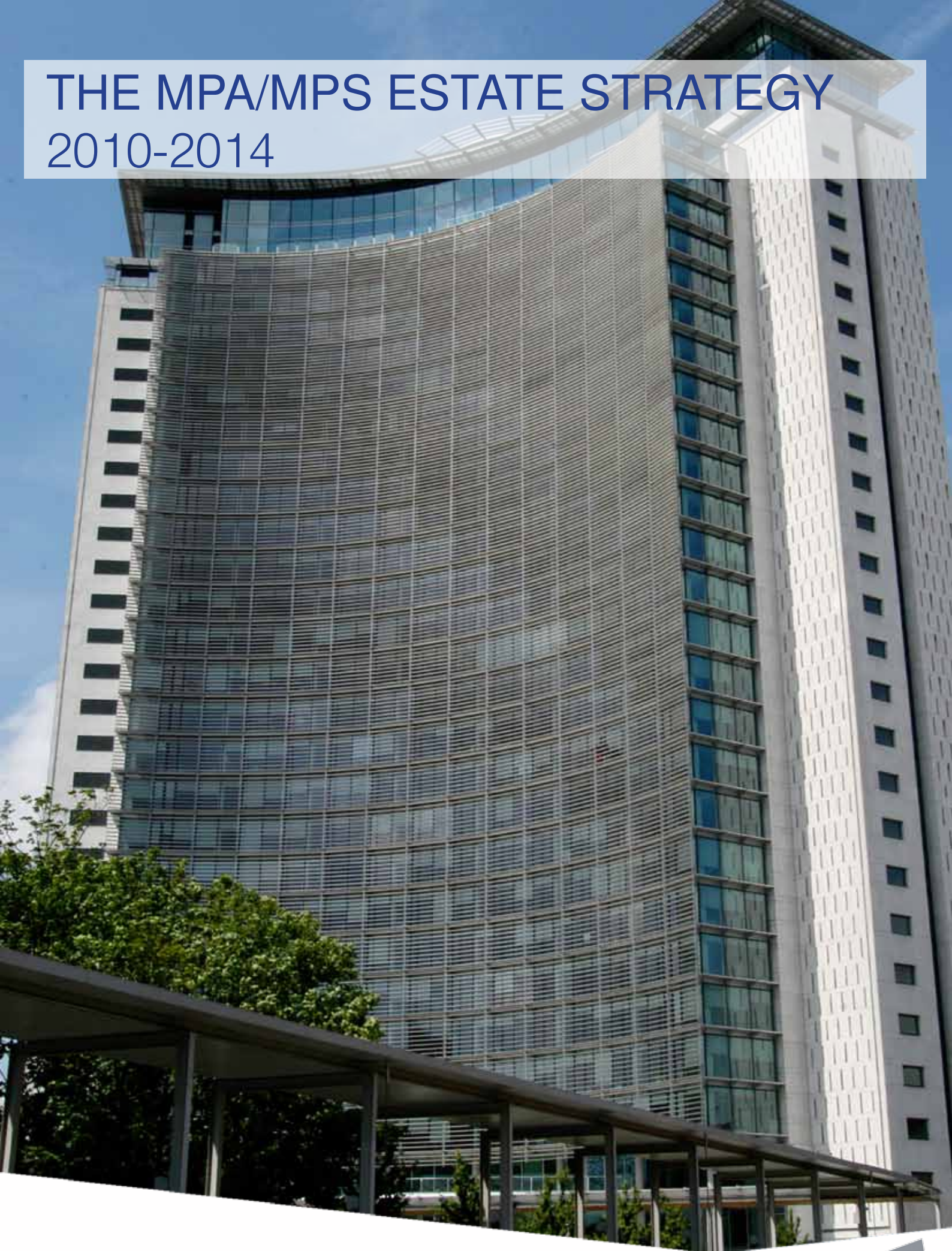
*...Where this can be demonstrated the priority for re-use will be a mixture of small business units with residential use. Where appropriate, employment designated land and sites in employment use may also accommodate alternative employment-generating uses. Such applications will be determined on an individual basis, having regard to site specific circumstances.*

7.3 For the above reasons it is demonstrated that the suggested amendment to Policy DM14 (New and existing employment sites) of Barnet's Development Management Policies DPD be made in order to ensure that the policy is compatible with the adopted development plan and to ensure that effective policing can be maintained.

## **Appendix A**

### **The MPA/MPS Estate Strategy 2010 – 2014**

# THE MPA/MPS ESTATE STRATEGY 2010-2014



**METROPOLITAN  
POLICE**

**MPA**

Metropolitan Police Authority

NEW  
SCOTLAND  
YARD



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# Foreword: Kit Malthouse

The Metropolitan Police Authority (MPA) is responsible for the Metropolitan Police estate and we recognise the vital role our buildings play in supporting the delivery of effective and efficient policing for communities across the capital. We are committed to providing Londoners with a customer focussed, effective, value for money service that is constantly responsive to the needs of the communities we serve. This means we need to modernise and adapt our buildings to accommodate up-to-date policing practices and functions.

The MPA owns a lot of property. In our view too much, especially since a lot of it is old and outdated, is very expensive to maintain and much is not used particularly efficiently. We need to sell some of it and modernise the rest. We also need to make sure our buildings are in the right place.

But buildings often represent something important, especially the local nick. The police station has become a powerful symbol of police presence and a threat of closure can often spark outrage and strong views. We are sensitive to this. In fact, we want a greater police presence and to make access to services easier. More cops on the street and front counters in better places such as supermarkets and libraries for example, will actually make contact with the police easier. We can then move all the other functions behind the front counter into efficient, cheaper buildings so we can spend even more money on blue uniforms to patrol your street.



The previous estates plan caused alarm bells to ring across the capital. So we tore that up and started again. This one has had a lot more work and thinking by a team from the MPA and MPS who we thank for their diligence. I hope it makes sense to you and that from it you can see that our aim is to drastically improve the service we offer London and release money for fighting crime.

Kit Malthouse  
**Chair of the MPA**

# Foreword: Anne McMeel

The Metropolitan Police Service faces many changes over the next few years – responding to a growing and diverse population, collaborating with new partners and working within increasingly difficult financial constraints. These challenges will impact on the whole service, including how we use the buildings and facilities from which we all work.



In doing this we can also have the flexibility we need to continue to be in the right place, at the right time, responding from the right locations to the needs of Londoners 365 days a year.

We have come a long way and made real progress – developing new facilities, working with partner organisations and providing more accessible policing, whilst at the same time improving existing buildings, and disposing of selected buildings which are no longer needed for policing in London today.

Times have changed, there is more pressure on resources and we need to make the estate work harder for us. This is not just about delivering savings but providing property services to policing colleagues and doing all we can to maintain our operational capability on front line policing. By making our estate work harder we can make it work more efficiently and effectively for the staff and officers who use it every day. We need to work smarter, making the estate a more dynamic asset that responds to operational need whilst delivering value for money for Londoners.

In following the Corporate Real Estate model we are working in the same way as many other large property occupiers, ensuring that Metropolitan Police Service Property Services is, in the short term, looking at solutions and opportunities whilst working to a longer term vision to deliver the right property solution to meet operational needs.

But there is also some way to go if we are to deliver our vision of an efficient, flexible and value for money estate. We will continue to respond professionally to deliver the policy needs of the Service at every level – from training and patrolling, to Safer Neighbourhoods bases and custody provision. Our buildings represent a real policing presence in our communities. This Estate Strategy sets out our vision for the estate in supporting the delivery of an effective policing service to London in a way that increases public confidence and safety.

Anne McMeel  
**Director of Resources**

# 1. Context: challenges facing the Metropolitan Police Service

The Metropolitan Police Service (MPS) serves a population of over 7.5 million living in an area of 1,579 sq kms. The population is expected to rise to 8.1 million by 2016 and as well as residents, London has a significant number of commuters and visitors who impact on the dynamics of the city.

Policing in London is a 24 hour/7 days a week operation delivered by over 50,000 people.

Each year the MPS deals with 7 million telephone calls and recorded crimes are in the order of 830,000 a year.

The MPS aims to build public safety and confidence by:

- Convincing communities we are on their side.
- Reducing crime and catching criminals.
- Being intolerant of violence.
- Delivering security on the streets of London.
- Delivering the right services at the right price.

The MPS's mission is "to make London the safest major city in the world". What needs to be done and how the MPS works as an organisation to deliver that mission over the medium term can be summarised as follows:

To deliver SAFETY and CONFIDENCE

Our PRESENCE must be felt across London  
Our PERFORMANCE must be outstanding  
Our PRODUCTIVITY must be high, and  
Our PROFESSIONALISM must be a cause for PRIDE

The MPS vision is supported by the corporate themes of safety, confidence and improvement.



Bromley Police Station - a modern multi-purpose building

## Safety

In promoting safety for those who live, work and visit London, the MPS is committed to reducing crime and catching criminals, being intolerant of violence and delivering security on the streets of London.

## Confidence

The MPS, in all that it does, is working to convince communities in London that it is on their side and to improve people's experience of its services.

## Improvement

The MPS aims to provide the right services at the right price thus ensuring the efficient, effective and economic use of all the resources entrusted to it.

More details about these themes can be found on the MPA and MPS websites, notably in the MPA/MPS Policing Plan and the MPA Met Forward documents.

[www.mpa.gov.uk](http://www.mpa.gov.uk)

[www.met.police.uk](http://www.met.police.uk)



New Scotland Yard



# 2. How do we police London?

London is a vibrant international city, home to 7.6 million people and many languages. Millions more work in, and visit, the city each year. It is a multi-layered world, shifting shape and size constantly.

The MPS protects London 24 hours a day. It is as dynamic as the city and is geared to respond to the public's calls for help, and to threats to public safety, from wherever they emerge.

The MPS makes its presence felt when and where it matters. Its workforce of more than 32,000 police officers, over 4,000 Police Community Support Officers (PCSOs) and over 14,000 support staff work across a number of inter-linked levels.

The MPS's interaction with the public takes place in a number of different ways:

- Command Control Call Centres take telephone calls and may be the first point of contact for some people.
- Front counters offer face to face contact for those reporting crime or collecting and returning forms.
- Safer Neighbourhoods bases serve local wards.
- Kiosk/information points with touch screens linked to the local team can be found in shopping centre locations.
- Mobile police stations serve local communities as required.
- The MPS is also contactable by email and emergency and non emergency telephone numbers.



A Met Police vehicle patrolling London

- In wards and neighbourhoods, the MPS is present in local policing teams. London has 625 electoral wards, each with around 20,000 households. Every ward has a local team which enhances police presence in local communities.
- In the 32 geographical borough commands, which match local authority boundaries, the MPS organises its 999 response teams and runs local Criminal Investigation Department (CID) teams. Borough Commanders are the link with councils and other agencies.
- On a pan-London level, the MPS runs murder squads, public order units, firearms teams, forensics support and other highly trained specialist units required to police a modern major city, such as squads to target drug traffickers.
- London has one of the world's busiest transport networks. The MPS operates a pan-London Safer Transport Command, which works closely with British Transport Police and Transport for London, and road policing.
- At a national and international level, the MPS leads the British policing response to terrorism and protects politicians, the royal family and visiting heads of state. It is an important player in the fight against international organised crime.
- In the sphere of terrorism, the work by police and other agencies at grass-roots level, with young people in schools and youth clubs in London, may be the key to disrupting the plans of terrorist groups based thousands of miles away. Counter-terrorist investigators find their inquiries stretching from a London neighbourhood to the international arena.
- The work at all these levels, from Scotland Yard specialist units to PCSOs, is part of an integrated approach, because the criminals and those who threaten the safety of the population recognise no levels or boundaries.
- Much of what the MPS does is visible and overt. Its uniformed response teams turn up to 999 calls from the public. In neighbourhoods and town centres across London, the MPS provides a visible, uniformed and reassuring police presence.

- The MPS is on display to the world as its uniformed officers police more than 4,500 public order events each year, ranging from the Notting Hill Carnival, through to football matches and the planned policing of the 2012 London Olympic and Paralympic Games.
- However, much of its most important protective work is 'invisible'. The public may benefit from a safer London but will not see the work of counter-terrorist detectives, child protection teams, e-crime specialists, surveillance units and other specialist squads, or the work MPS officers and staff carry out to ensure offenders are put into the criminal justice system.
- Some of the property the MPS uses is publicly identifiable and visible. Many response officers and some neighbourhood teams are based in 'traditional', multi-functional police stations, alongside custody suites and CID units.
- However, in recent years, neighbourhood teams have been based in non-police premises, including council offices. The key is to be based in or very close to their wards.
- Increasingly, as older buildings are replaced, the emphasis is on ensuring police officers are based in locations which allow them to get to the public, in need and distress, as quickly as possible. This may mean building separate custody bases and putting response or local policing teams in premises at the heart of the areas they police.
- Police officers and staff do not wait in stations for calls to respond to. They are out, on the streets and in communities, patrolling. Increasingly, with police officers patrolling on their own, the 'footprint' they cover in London is bigger.
- What matters is not the buildings the officers gather in for their shifts or their locations, but that they are well-briefed and that they know their areas. What matters is that they have the right equipment to get to the public, when they are needed, as quickly as possible.
- Equally, some of the MPS's most vital units, such as surveillance teams working against armed gangsters, are in anonymous buildings.
- Working at a computer, in an office, to identify those cyber-trafficking child abuse images may lead to the rescue of children in London from abuse. Invisible, covert policing plays a major role in keeping London safe.
- Increasingly, the handling of detainees in custody is moving from the older, traditional stations to purpose built custody centres. This will make little difference to the public whose main concern is that offenders are arrested.
- The key to all of the MPS's plans is that it can get to people who need its help quickly, where and when it counts, and that people are able to call on it for help - by phone, SMS, email, across the internet or in person.







### 3. Context: challenges facing the Metropolitan Police estate

Overall responsibility for the estate is vested in the Metropolitan Police Authority (MPA), the statutory organisation responsible for ensuring an efficient and effective police service for London. Day-to-day management of the estate is delegated by the MPA to the MPS which occupies the estate. The Property Services Department, within the Resources Directorate, has delegated responsibility for the management of the estate.

The estate currently comprises just under 1,000,000 sq m and in the order of 900 buildings. It can be categorised in various ways but from a public perspective the most important differentiation is between public facing and non-public facing functions.

**Public facing facilities** include places where the public can make face to face contact with police officers whether they are victims or witnesses of crime, offenders, or using the police services in another way.

**Non-public facing facilities** include police training facilities, forensic research establishments, call centres and office buildings for the MPS business support services (finance, human resources, etc).

The MPS also has residential facilities including blocks of flats, individual houses and single flats, or hostel style 'section house' accommodation allocated under specific criteria to staff and officers.

The key challenges facing the estate are:

- Responding to the speed of change and the increasingly dynamic nature of policing.
- Having the right buildings, of the right size, in the right place.
- Being able to accommodate new policing operations at short notice.
- Accommodating new functions into existing buildings without disrupting current operations.
- Working with a range of other public sector partners.
- Working within increasingly difficult financial constraints and ensuring the MPS is making the best use of its assets.



# 4. Meeting the challenge

Along with people, information technology and vehicles, property is one of the key resources which supports operational policing. To ensure efficiencies in the use of property, the MPA and the MPS regularly review their Estate Strategy and supporting plans for implementing it.

In the last few years the MPS has concentrated on the provision of Safer Neighbourhoods bases, new custody facilities and new patrol bases across the capital. Whilst the estate has expanded in terms of numbers of buildings, selected properties have been sold where they are no longer needed for operational delivery.



Enfield Patrol Base

The MPA and the MPS now need to rationalise the estate to ensure it meets service needs in the most cost effective manner. The MPS will work to agreed space standards and co-locate functions in order to operate from fewer properties, but will ensure that it maintains operational policing capability.

The current Estate Strategy comprises three core elements:

- The Property vision.
- Property objectives.
- Key themes for change and targets.

In addition, the MPS has a range of implementation plans.

# 5. The property vision

## VISION

Continually improving the use of the estate.

We will optimise the use of the estate to achieve MPA/MPS objectives through prioritised spending and ensuring value for money. We will achieve this using a framework that supports inclusion and recognises the diversity of the communities we service.

The Property Services team supports the MPA and MPS in the strategic planning, delivery, management and operation of the estate. The Property vision is in line with other public bodies with an operational or service focus, where property is a supporting function. The planning, delivery, operation and review of property must flow from the operational need. However, this does not stop the MPS from challenging and reviewing the operational need to ensure value for money from its resources. The aim is to provide a well planned property portfolio which:

- Meets current and future service needs in terms of confidence, safety and value for money.
- Is in good condition with minimal maintenance backlog.
- Rationalises property wherever possible in line with future needs (e.g. crime, risks, changing population, growth areas, changing patterns of service delivery, work style of the MPS staff).
- Provides working conditions that support good service performance.
- Capitalises upon co-location opportunities within London and exploits the synergies of partnerships.
- Releases capital for reinvestment where appropriate.
- Is regularly reviewed using agreed criteria.
- Allocates investment in future property according to a robust corporate prioritisation framework.
- Continues to drive energy efficiency and uphold high environmental standards.

## 6. Property objectives

The property objectives are aligned with the MPS objectives of safety, confidence and value for money. The following high level property objectives have been developed:

### Safety

- Provide safe and secure facilities throughout the estate for those using or visiting the MPA/ MPS properties.
- Provide accommodation that meets statutory and regulatory requirements in terms of health and safety and accessibility.
- Provide accommodation in appropriate locations supporting operational imperatives.

### Confidence

- Provide accommodation in support of the Safer Neighbourhoods programme and separately the provision of front counter facilities.
- Provide good quality accommodation for service needs in appropriate locations.

### Value for Money

- Ensure maximum use of real estate assets whilst minimising operational cost.
- Offer an efficient working environment for staff supporting high performance.
- Co-locate services to capitalise on the opportunities of partnership working.
- Promote sustainable and environmentally friendly provision and use of property.





# 7. Framework for estate change

The framework for change consists of:

- Real estate - the physical estate and buildings.
- Process - the process change required to support an effective and efficient estate.
- Service - how Property Services, together with colleagues from across the MPS, respond to the estate challenges.



Wapping Pontoon and Police Station  
houses the Metropolitan Police river fleet

# 7.1 Real estate: fit for purpose estate

## Condition

The current operational estate is highly diversified and has a significant backlog of maintenance issues. The ongoing programme of condition surveys will ensure that the MPS updates the backlog costs and provide a revised programme of repairs, redevelopments and building disposals.

## Sufficiency

The MPS has an ongoing programme to gauge the size of the estate relative to the operational needs. It has also developed policies that allow it to provide suitable front counter facilities or reception areas and Safer Neighbourhoods bases for the communities it serves.

## Capital programme

There is an ongoing programme of new building development to replace the older and unsuitable buildings in the estate. A matrix, which prioritises new capital projects against the Policing London Business Plan’s priorities, has been developed.

## Suitability

In a number of cases, buildings are not being used for the original purpose they were designed for. The MPS is therefore pursuing a programme, as new buildings come on stream, to move business units to more fit for purpose premises.

A planned exit strategy has already been developed in regard to the residential estate, where it is anticipated that core property holdings will be a maximum of 200 units.

Property Services are developing work programmes to optimise the utilisation and re-profiling of the estate. Part of this programme is the development of appropriate standards and protocols for the use of property.

To deliver a leaner, more effective estate, business processes and operational demand are being analysed within properties primarily used for office, storage and training purposes. The overarching aim is to meet operational need while reducing cost and generating capital receipts which can be invested in operational policing and public facing buildings.

# 7.2 Process

## Corporate Real Estate approach

The MPS has moved to a more corporate approach to the planning, delivery, operation and use of property. Property Services are the professional lead for real estate and will advise MPS Management Board so that property related decisions can be taken in the overall corporate interest of the service. All business groups have been consulted and are supportive of this strategy which will help to bring about more effective use of property.

Property Services are also putting the Corporate Real Estate approach at the heart of the delivery of property services within the organisation.

## Collaboration

In financially challenging times it is even more important that the MPS works closely with other public agencies and private sector partners and, where practical, looks to share services with partners.

Its key regional public partners are the other members of the Greater London Authority - Transport for London in particular.

At a local level the MPS interfaces with the borough councils and the Primary Care Trusts through the Local Strategic Partnerships (LSP).

Through the Safer Neighbourhoods programme the MPS has located a number of units within assets owned by other public partners, e.g. local authorities. The MPS is keen to continue this initiative so it is currently working with a number of London councils to develop joint solutions to some of its property challenges.



Safer Neighbourhoods Base - Bromley

## Criteria for retention, rationalisation and acquisition of property

To achieve value for money in its estate and reach optimal cost levels, the MPS needs to be thorough in challenging its need for property and its intensity of use.

The MPS recognises that it will need to provide for the property and accommodation needs of existing, new and improved public services and the needs of its workforce. At the same time it needs to release significant capital from, and reduce the revenue costs of, the estate. This will be done through regular service property reviews and area property reviews. The MPS has a decision matrix to determine whether to hold or dispose of properties and this is continually reviewed against the changing operational policing priorities. Whilst the criteria are continually reviewed, particularly operational related matters, the issues under consideration include, but are not limited to:

- Impact on operational capability (e.g. single site patrolling, custody provision, front counter provision).
- Annual revenue costs.
- Projected capital investment.
- Public footfall (where appropriate).
- Carbon footprint / energy performance/ Display Energy Certificate (DEC) rating.
- Utilisation of facilities / workspace.
- Options for lease termination.
- Availability of alternative building solution.
- Presence of Information, Communications and Technology (ICT) notes.
- Current building condition.
- Building and location suitability.

The MPS also has priority lists for new capital projects which are reviewed against agreed criteria. This results in a comprehensive investment plan for property.

## Corporate Social Responsibility (CSR)

As with town planning, the MPA and the MPS are developing a separate CSR strategy. The MPA and the MPS have a very strong commitment to the principles of social, economic and environmental sustainability. These are corporate responsibilities which business units uphold and the Resources Directorate, including Property Services, drive through the estates vision, strategy and plans.

In the long term re-profiling of the estate, the following are being taken into account:

- Energy costs of buildings.
- Responsibilities towards Carbon Reduction Commitment (CRC).
- Travel patterns of the public as well as employees .
- Environmental targets set by central government as well as the Greater London Authority (GLA).



# 7.3 Service

## Olympics and the Thames Gateway

The London 2012 Olympic and Paralympic Games and the Thames Gateway are two significant programmes of work. The MPS has an Olympic Programme team as well as a Thames Gateway Programme Board. The MPS is closely monitoring any new processes and operational plans being adopted in these two programmes and feeds any improved processes, systems and ideas into its future plans.

## Multiple clients, single source of advice

Property Services' current structure provides for a dedicated single point of contact for each MPS business group. Through these individuals, the MPS coordinates the collective operational demands of the service so it can plan the estate on a corporate basis. This way it can bring about synergies across the various MPS business groups.

## Value for money

The MPS is very focussed on achieving year on year value for money improvements in the estate. Driven by the need to make better use of the estate, it should be able to reduce its size which in turn will drive down running costs and release surplus assets for disposal.

The MPS strives to develop as well as follow best practice in everything it does. It participates in a number of property industry groups, as well as police specific groups, which share and disseminate these skills and information. It has also shared with the Home Office some of its evolving design standards and, through its relationship with Transport for London, shares information and good practice.

## Town planning

The MPS has a separate town planning strategy - *Planning for Future Police Estate Development*.

Town planning is an important tool for the MPS to use in a proactive as well as a reactive way. The MPS articulates to regional and local government the policing demands in terms of property. It also responds to requests from local authorities on large scale development opportunities where the development justifies a dedicated police facility or contribution to the local policing function. The MPS therefore influences the Mayor's London Plan as well as individual borough's Local Development Frameworks (LDF).

Under the Secure by Design initiative the MPS has a number of Crime Prevention Design Advisors, who provide input at a design stage into large scale regeneration projects.

The MPS will continue to input into the emerging Community Infrastructure Levy (CiL).



A new Custody Centre - Waltham Forest

# 8. Performance measurement and improvement

To support the objectives and key themes the MPS has a range of implementation plans. The MPS will:

- Set targets and the owners allocated will monitor progress on these commitments. These will be reported through our performance monitoring framework.
- Have a strong commitment to improving data collection, systems and management. It is reviewing its internal data management systems and will determine future need against this strategy.
- Continue to conduct post occupancy evaluation of all programmes and projects to ensure benefits are being realised and lessons are fed back into new programmes.

In addition to these internal measures, the MPS takes part in a number of voluntary and mandatory benchmarking exercises. Through the Police Property Managers Group and its internal systems, the MPS will continue to monitor the performance of the estate.



## Glossary

CiL	Community Infrastructure Levy
CRC	Carbon Reduction Commitment
CSR	Corporate Social Responsibility
DoR	Directorate of Resources
FM	Facilities Management
GLA	Greater London Authority
HMIC	Her Majesty's Inspectorate of Constabulary
HR	Human Resources
ICT	Information Communications Technology
KPI	Key Performance Indicator
LSP	Local Strategic Partnership
MPA	Metropolitan Police Authority
MPS	Metropolitan Police Service
PSD	Property Services Department
SIP	Service Improvement Programme
TfL	Transport for London

## Contact

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## **Appendix B**

**Letters of Representation to CS Issues & Options (19/09/2008),  
CS Direction of Travel (11/01/2010),  
CS Publication Stage (26/11/2010),  
CS Pre-Submission Amendments (08/06/2011),  
DM Preferred Approach (26/11/2010) and  
DM Submission Version (08/06/2011)**

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19 September 2008

Dear Sir/Madam

**REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY  
ISSUES & OPTIONS – CORE STRATEGY**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above document. The MPA provide a vital community service to the borough of Barnet and policing is now recognised within the 2008 London Plan as being an integral part of social infrastructure.

**Context to MPA's 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*'.

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 is defined as an element of social infrastructure.

This is also reflected in Policy 3A.18 (formerly Policy 3A.15 in 2004 version) which states: '*Policies in DPDs should assess the need for social*

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*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.

The London Plan (Consolidated with Alterations since 2004) defines policing as a material consideration when assessing the impact of 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 forthcoming S106/Planning Contributions policies.

#### **MPA Asset Management Plan**

The need for additional police facilities is highlighted in the Metropolitan Police Authority's Asset Management Plan for Barnet. The MPA recently consulted locally on this document.

***Recommendation: The MPA suggest that a meeting be arranged with the London Borough of Barnet to discuss their estate and aspirations for the future in more detail.***

#### **Suggested Representations**

Chapter 4 (Vision and objectives) highlights Community Safety as one of its core objectives. It states 'To create the conditions for a safer and more secure Barnet by designing out crime and reducing anti-social behaviour, particularly in known 'hotspots'.

***Recommendation: The MPA should support this objective but recommend the following wording. 'To create the conditions for a safer and more secure Barnet by designing out crime and reducing anti-social behaviour through improved and increased policing facilities, particularly in known 'hotspots'.***

Chapter 5 (Issues and options to address the core objectives) highlights the intended growth for the Barnet area. Section 5.2.5 states 'Over the next 15 to 20 years a new economic hub at Brent Cross and Cricklewood will emerge as the Gateway of North London. The creation of over 20,000 new jobs and a new Metropolitan town centre will transform the sub regional economy of north London.

***Recommendation: In order to monitor future development, demographic changes and potential locations for policing facilities, the MPA suggest that they be consulted on any proposed development consisting of over 100 residential units, 5000 m<sup>2</sup> of floorspace; and 100 car parking spaces.***

Section 5.3.2 (Theme 2 Delivering the infrastructure to accommodate growth and ensure sustainable development) identifies Community Infrastructure as a key to delivering infrastructure. Community Infrastructure is described as 'Ensuring that the social and community infrastructure (schools, hospitals and health facilities, and religious meeting places) are in place'

**Recommendation:** *The MPA recommend that 'policing facilities' are included within the definition of Community Infrastructure, so as to read '...schools, hospitals and health facilities, policing facilities and religious meeting places'.*

Section 5.3.13 (Providing community services for sustainable communities) states that 'Well planned mixed use areas carefully design buildings, open spaces and neighbourhoods can "design out" crime and help to reduce the fear of crime. As the Borough grows, new neighbourhoods emerge and existing suburban and town centres change, sensitive planning of uses, activities, open spaces, etc can improve community safety. Greater collaboration with the Police and Community Safety Partnerships inputting to the spatial planning to these areas will enhance safer neighbourhoods.

**Recommendation:** *The MPA warmly welcome this commitment.*

Section 5.3.9 (Providing community services for sustainable communities) provides a variety of alternative options, these include:

- Should the Council encourage the joint use of new and existing community facilities? What uses can be sensitively located together?

**Recommendation:** *The MPA recommend that provision is made for the intended future policing facilities as highlighted in the MPA's Asset Management Plan.*

- Should the Council protect existing community facilities as well as sport, leisure and recreation facilities, where fully utilised, from displacement by development, ensuring re-provision of facilities in those instances where development takes place?

**Recommendation:** *The MPA recommend that planning permission be granted for applications that result in a loss of community facilities when a replacement community facility of a similar nature is provided elsewhere in the area.*

- Should community facilities only be allowed in specific locations where they are accessible by public transport and where there are on-street parking constraints, such as town centres or growth areas?

**Recommendation:** *The MPA recommend that the location of certain service provider needs, for example public facing functions such as front counters and safer neighbourhood bases, are appropriately located at convenient locations for public accessibility such as secondary shopping frontages, where as other functions such as patrol bases could be more suitably accommodated within industrial estates. The preferred option should be expanded to state 'Community facilities should be located*



***generally in publicly accessible areas, but also within alternative areas where deemed appropriate'.***

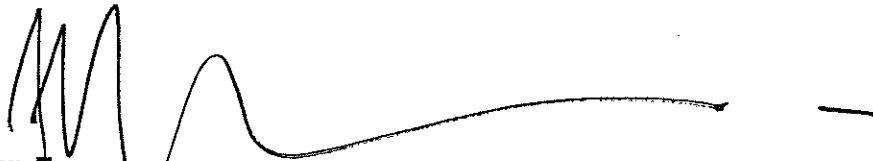
Section 5.4.18 (Affordable housing) provides a variety of options with regards to affordable housing in the Borough. The document provides the following options:

- Given the need to be in general conformity with the current London-wide target of 50% affordable housing on 10 units or more but taking into account an expected shift in Mayoral policy direction, should the Council consider retaining or changing its existing approach to affordable housing with a different threshold where it is required for new residential development to reflect local circumstances, need and viability of delivery?
- Should we seek a greater contribution towards low cost home ownership and affordable housing that supports people and families through the housing journey towards full owner occupation?

***Recommendation: The MPA support the maximum provision of affordable housing within the borough; recommend that Key Workers (which includes policing staff) be given priority to these homes, and supports greater contributions to low cost home ownership***

I trust this is appropriate and the objectives of the MPA will be reflected in the emerging Core Strategy. Please do not hesitate to contact Julieanne Saxty or myself should you have any queries.

Yours sincerely



**Alun Evans**  
**Senior Associate Director**

Enc. Metropolitan Police Estate – Asset Management Plan Barnet

c.c. Metropolitan Police Authority

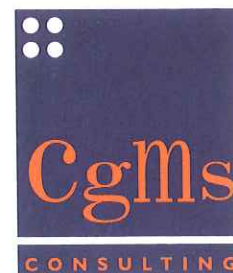
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11 January 2010

Dear Sir/Madam

**REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY  
CORE STRATEGY - DIRECTION OF TRAVEL**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above document. The MPA provide a vital community service to the borough of Barnet and policing is now recognised within the 2008 London Plan as being an integral part of social infrastructure.

**Context to MPA's Representations**

CgMs made representations on behalf of the MPA to the Core Strategy Issues and Options document in September 2008. Following the submission of these representations a meeting was held on 2 September 2009 in which Nick Lynch and Philip Osei-Mensah from the London Borough of Barnet and Matthew Roe and Julieanne Saxty from CgMs attended.

During this meeting, the MPA's Estate Strategy was outlined in detail and future policing requirements for the borough discussed. Following this meeting, examples of draft policies supporting the provision of police facilities from other London Boroughs were provided. We attach with this letter CgMs' Briefing Note.

Mindful of the above, further representations regarding the Core Strategy which reflect policing needs and which ensure that the emerging policy document will reflect national planning guidance are made below.



## **Representations to the Direction of Travel document**

### *Chapter 1- Introduction*

Paragraph 1.2 highlights the MPA as a Local Strategic Partner. ***The MPA support the opportunity to work alongside Barnet and therefore support this reference.***

### *Chapter 6 Vision and objectives*

Paragraph 6.2 highlights the core objectives to deliver the borough's vision. Under the heading '*to meet social infrastructure needs*' a number of community facilities are outlined. However policing is not recognised as a community facility, contrary to Policy 3A.17 of the London Plan.

***The MPA therefore recommend that the wording of the bullet point be amended to including policing (additional wording underlined):***

- ***To ensure provision for community needs arising from housing growth including education, policing, health, social care and integrated community facilities;***

Furthermore under the heading '*To promote strong and cohesive communities*' the MPA previously made representations to include reference to policing facilities, however this was not taken on board. The MPA wish to reiterate the need for increased policing facilities in the borough to ensure safe and secure communities are created. This reflects the national guidance of PPS1 which states (paragraph 27 (iii) (Delivering Sustainable Development)) that development plans should promote safe and crime free communities.

***Recommendation: The MPA wish to make the following amendment to this bullet point in order that the emerging core strategy reflects national guidance (additional wording underlined):***

- ***To create the conditions for a safer and more secure Barnet by designing out crime and reducing anti-social behaviour, particularly in known 'hotspots', and through supporting enhancements to policing facilities.***

### *Policy CS 3 - Protecting and enhancing Barnet's character*

The MPA recognise the importance of good design in ensuring new developments are safe and secure, therefore helping reduce crime. The MPA support the development of safe and attractive building layouts, however it is recommended that reference to the use of 'Secured by Design' principles are included within this policy, concurrent with government guidance within PPS1 which states that Council's should prepare development plans which promote inclusive, healthy, safe and crime free communities. This further provides excellent guidance to developers and other built environment professionals. Furthermore the MPA note that Policy CS 11 supports making Barnet a safer place and support this policy.





***The MPA recommended that the following alteration is made to Policy CS 3 (additional wording underlined):***

***We will ensure that development in Barnet respects local context and distinctive local character and creates:***

- ***Safe and attractive building layouts in line with Secured by Design Principles;***

*Policy CS 4 - Promoting Barnet's town centres*

Policy CS 4 deals with uses in Barnet's town centres. The MPA foresee the introduction of police shops in town centres as an integral part of their future estate. They will increase opportunity for the community to interact with police officers and will increase accessibility for neighbourhood policing. Preferably these police shops will be located in town and retail centres where footfall is high and they are therefore easily accessible to the public. A police shop use will add to the vitality of town centres by providing an increased perception of safety and security.

Mindful of the above, it is considered that a planning policy basis to support community facilities such as police shops in town centres in LB Barnet would not prejudice the supply of retail floorspace in town centres or the nature of these town centres in the Borough.

Further, such a planning policy basis complies with London Plan Policy 3A.18 which states policies in DPDs should assess the need for social infrastructure and community facilities, such as policing, in their area. It further states that policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport for the population that use them.

***Mindful of the above, the following alterations to Policy CS 4 is requested (additional wording underlined):-***

- ***We will ensure the efficient use of land and buildings in town centres, encouraging a mix of compatible uses including retail, managed affordable and flexible workspace, community facilities such as policing, leisure and residential that add to the vibrancy of the area whilst respecting character;***

*Policy CS 6 - Promoting a strong and prosperous Barnet*

Chapter 12 highlights the borough's future strategy for employment land. The MPA are content in principle with the approach in Policy CS 6 - Promoting a strong and prosperous Barnet, which promotes the protection of employment sites in the borough however this is on the basis that policing facilities are considered acceptable on such land.

The MPA have identified the potential of relevant employment sites in helping them meet the goals of their estate strategy. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MPA's estate strategy. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similar locations.





Whilst falling outside the 'B' Use Class definition, these policing uses are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.

It is demonstrated above that the policy requirement to provide employment uses within designated existing employment sites can be met through the provision of appropriate policing facilities on such land. Mindful of this, policing uses can be appropriately located within existing employment sites. Furthermore, it is considered that a planning policy basis as suggested below to support appropriate policing facilities on employment sites in LB Barnet would not prejudice current or future employment land supply across the borough, as such uses are compatible with the requirement to provide employment opportunity. This is supported by a number of London Borough's which have approved policing facilities on employment/industrial land, including Enfield (Cambridge Business Park), Haringey (Quicksilver Place) and Greenwich (Warspite Road).

This approach is supported by the strategic development plan within Policy 3B.4. Industrial Locations which states that policies in DPD's 'should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure.' Furthermore, Policy 2.17 Strategic industrial locations of the Emerging London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. It is clearly demonstrated above that particular policing uses are essentially industrial and that the emerging Core Strategy should therefore reflect this. It is also further demonstrated that certain policing uses will also fulfil the strategic requirement regarding the provision of social infrastructure.

In order to comply with strategic policy in this regard the following alterations to Policy CS 6 are recommended below.

***Recommendation: The MPA recommend that Policy CS 6 be amended to allow for policing facilities on surplus employment land (additional wording underlined).***

- ***safeguarding existing employment sites that meet the needs of modern business and emergency service providers. Development that improves or maintains the quality of existing employment provision will be encouraged, including that for emergency service providers.***

*Policy CS 7 - Providing quality homes and housing choice in Barnet*

The MPA support the provision of affordable housing and in particular key worker housing in line with the London Plan.

*Policy CS 9- Enabling Integrated Community Facilities and Uses*

This policy deals with the provision of community facilities. The MPA requested within their previous representations that policing facilities should be referred to within this section. Unfortunately this was not taken on board and the MPA would therefore like to reiterate the importance of policing facilities being recognised as a





community facility and the need to ensure that double counting of replacement community facilities does not occur.

The MPA recommend amendments to this policy to ensure this aspect of the emerging Development Management Policy document is consistent with Policy 3A.18 of the London Plan. This includes police facilities within the definition of 'Community Facilities' and states that the *net loss* of community facilities must be resisted.

Furthermore, several London Borough's have made amendments to their emerging planning policy to support this approach, these include Policy C2 of Greenwich's UDP (adopted 2006) and Policy CK 1 (section c, iii) of the Royal Borough of Kensington and Chelsea (emerging).

***Recommendation: The MPA suggest that the wording to this paragraph be changed to read (additional wording underlined):***

***The Council will work with our partners to ensure that community facilities including schools, policing facilities, libraries, leisure centres and pools, community meeting places and facilities for younger and older people are provided for Barnet's communities.***

***We will:***

- ***'resist any development that would lead to a net loss of community facilities. Replacement community facilities elsewhere in the borough will be acceptable in line with a current strategy for reprovion'***

#### *Chapter 17 Making Barnet a safer place*

Paragraph 17.1.6 of this chapter states that the Borough will expect development proposals to reflect guidance in the government publication Safer Places: The Planning System and Crime Prevention (2004) and the principles of Secured by Design the official UK Police flagship initiative for 'designing out crime'. ***The MPA support this statement.***

Paragraph 17.1.7 states that greater collaboration with the Metropolitan Police and Barnet Safer Communities Partnerships is desired. ***The MPA support this statement.***

Paragraph 17.1.8 outlines the Metropolitan Police Authority's Asset Management Plan. ***The MPA are currently still developing this strategy, however support the summary provided.***

#### *Policy CS 11 (Making Barnet a safer place)*

Policy CS 11 highlights the Borough's strategy to make Barnet a safer place. ***The MPA support the 6 bullet points within this policy and support the reference to working alongside the MPA.***

#### *Chapter 20 Delivering the Core Strategy*

Part 20.5 of this section deals with Planning obligations. A list of proposed items for which planning obligations will be sought is outlined in section 20.5.3. The MPA are aware that significant additional development is likely to come forward in



the borough which may increase demands on community facilities such as police facilities. Policy 3A.18 of the London Plan states that policies in DPDs should assess the need for social infrastructure and community facilities (including police facilities) in their area, and ensure that they are capable of being met wherever possible. Policy 3A.26 of the London Plan also highlights the importance of 'ensuring communities benefit from development including through Section 106 agreements' and improving safety and security. The MPA therefore request that the impact of development upon policing be taken into account in this section. This can be delivered through S106 agreements where these are consistent with the policy tests in Circular 05/05.

***Recommendation: In order to ensure the Core Strategy complies with the statutory development plan policy it is requested that an additional point is added to the list within section 20.5.3 to include (additional wording underlined):***

- ***policing;***

Section 20.6 deals with the 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 level of policing required within the borough. Several issues such as demographics and socio-economic factors determine policing requirements. 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 continually monitoring their needs in Barnet 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 Barnet 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.

***Recommendation: The MPA recommend that the traditional S106 route for the provision for policing should remain alongside any introduction of CIL. Therefore the following alteration is recommended to section 6.2.1 (additional wording underlined):***

- ***'Negotiated planning obligations will still be possible for site specific issues such as policing and to allow for affordable housing to be delivered on site'.***





We trust this is appropriate and the objectives of the MPA will be reflected in the emerging Core Strategy. Please do not hesitate to contact Julieanne Saxty or me should you have any queries.

Yours faithfully

  
**Alun Evans**  
**Senior Associate Director**

Enc. Metropolitan Police Estate – Asset Management Plan Barnet  
c.c. Metropolitan Police Authority



## **BRIEFING NOTE**

### **LONDON BOROUGH OF BARNET CORE STRATEGY ISSUES AND OPTIONS POLICY EXAMPLES**

#### **Purpose of Note**

This note has been provided further to our meeting on 2 September 2009, concerning the Metropolitan Police Authority's representations to the draft Core Strategy. At the meeting you requested we provide examples of other policing policies which have been included within Local Development Document across London.

The examples provided below cover a variety of different issues, with particular reference to the potential for policing facilities to be located in employment/industrial areas, the location of police shops in town centre, planning obligations for policing and the recycling of surplus police stations.

Further to these specific policies, we would like to highlight that significant progress has already been made with regards to the establishment of Patrol Base facilities, with successful operational facilities integrated into existing warehouse buildings to provide the Borough based patrol bases for Waltham Forest and Enfield. These two Boroughs have shown the successful implementation of other uses on employment/industrial land and how policies within LDF documents can successfully support policing requirements.

<b>ISSUE 1</b>	<b>OVERARCHING SUPPORT FOR THE DELIVERY OF POLICING FACILITIES</b>
<b>BRIEF</b>	The Estate Strategy seeks to establish a range of new kinds of operational police facilities, ranging from police shops in easily reached locations which are open to the public to patrol bases and custody centres which are not publically accessible but which need good road access and could be located in employment areas. Boroughs' policies should acknowledge the range of facilities and appropriate locations.
<b>EXAMPLES</b>	<b>LONDON BOROUGH OF HAVERING CORE STRATEGY AND DEVELOPMENT CONTROL POLICIES DEVELOPMENT PLAN DOCUMENT ADOPTED 2008 POLICY CP8: COMMUNITY FACILITIES</b>  Policy CP8 states:  The Council will work in partnership with other bodies to ensure that a suitable range of community facilities are provided to meet existing and forecast demand by: <ul style="list-style-type: none"><li>• ensuring major developments provide facilities to meet new demand, especially in London Riverside and Romford Town Centre, where significant growth in the number of residents is planned;</li></ul>

	<ul style="list-style-type: none"> <li>• ensuring all new community facilities are located in places that are or will be accessible by a range of transport, including walking and cycling, and that the development itself is accessible to all groups;</li> <li>• retaining or re-providing community facilities where a need exists;</li> <li>• allowing the development of essential community facilities necessary to meet the specific needs of the community on non-allocated land and involving the net loss of existing housing;</li> <li>• seeking developer contributions towards the provision of essential new community facilities.</li> </ul> <p>"Community facilities" include:</p> <ul style="list-style-type: none"> <li>• education facilities;</li> <li>• health and medical centres;</li> <li>• residential care and day care facilities;</li> <li>• childcare facilities (including private nurseries);</li> <li>• community centres and halls;</li> <li>• places of worship;</li> <li>• cemeteries and crematoria; and.</li> <li>• <b>police facilities</b></li> </ul>
	<p><b>ROYAL BOROUGH OF KINGSTON UPON THAMES KINGSTON TOWN CENTRE AREA ACTION PLAN ADOPTED 2008 POLICY K5: PUBLIC ADMINISTRATION, POLICE AND HER MAJESTY'S COURT SERVICE</b></p> <p>Policy K5 states:</p> <p>The Council will work with partner organisations, including central government agencies, the <b>Metropolitan Police</b> and Her Majesty's Courts Service (HMCS) to maintain and enhance facilities to meet changing service and accommodation needs.</p>
	<p><b>LONDON BOROUGH OF MERTON DRAFT CORE STRATEGY PREFERRED STRATEGY 18: SAFER COMMUNITIES</b></p> <p>Preferred Strategy 18 states:</p> <p>Merton will create safer places and help crime by measures such as:</p> <ul style="list-style-type: none"> <li>• Promoting good design in development proposals,</li> </ul>

	<p>ensuring the design delivers safe and secure environment through providing a sense of ownership, natural surveillance, good access, well-lit routes. and reuse of vacant and derelict sites;</p> <ul style="list-style-type: none"> <li>• Enhancing the viability and vitality of town centres through retention of a mix of uses and that there are open spaces, sports, recreational and community facilities where these are needed in Merton;</li> <li>• Ensuring that crime reduction measures form part of any town centre management strategy and that contributions are sought towards such measures where required from new development; and</li> <li>• <b>Providing for the Metropolitan Police Service in the delivery of its estate strategy where appropriate</b></li> </ul> <p><b>LONDON BOROUGH OF RICHMOND CORE STRATEGY ADOPTED APRIL 2009 POLICY CP16: LOCAL SERVICES/INFRASTRUCTURE</b></p> <p>Policy CP16 states:</p> <ul style="list-style-type: none"> <li>• 16.A The overall strategic approach is to ensure the provision of services and facilities for the community.</li> <li>• 16.D New developments will be expected to contribute to any additional infrastructure and community needs generated by the development. New development will also have to take account of the requirements set out in the Planning Obligations Strategy (Supplementary Guidance to the UDP). Obligations will be sought in accordance with Circular 05/05 and any superseding advice.</li> </ul> <p>Supporting text in paragraph 8.3.4.5 of this policy states:</p> <ul style="list-style-type: none"> <li>• Community facilities are essential for the Borough's population and it is important that these facilities and services are accessible by all. The Council will work with Partners such as the infrastructure providers, the Local Strategic Partnership, the <b>Police</b> and Community Safety teams, and the Community and Voluntary sector in ensuring the provision of services. The Council will ensure that essential services are not lost to the community, even if there may be changes in the way some services and facilities are provided, and will support the provision of new essential community facilities, such as those needed by the police e.g. patrol bases and custody centres.</li> </ul>
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	<p><b>LONDON BOROUGH OF BARKING AND DAGENHAM CORE STRATEGY SUBMISSION VERSION POLICY CC3: SOCIAL INFRASTRUCTURE TO MEET COMMUNITY NEEDS</b></p> <p>Policy CC3 states:</p> <ul style="list-style-type: none"> <li>• The local planning authority will work with the Metropolitan Police Authority to ensure an adequate policing provision to meet local and strategic needs.</li> </ul>
	<p><b>LONDON BOROUGH OF BRENT CORE STRATEGY SUBMISSION VERSION SECTION 4.97 EMERGENCY SERVICES</b></p> <p>Section 4.97 states:</p> <ul style="list-style-type: none"> <li>• In planning for a significant increase in housing and therefore population, it is important that the requirements of the Emergency Services, i.e. <b>Police</b>, Fire and Ambulance service are taken into account. Additional accommodation has been secured for the Metropolitan Police in phase 1 of the Wembley City development as part of the existing outline permission. The council will continue to liaise with the Emergency Services to ensure that their detailed needs are taken into account when detailed area-based guidance is produced and when major proposals are brought forward.</li> </ul>

<b>ISSUE 2</b>	<b>DEVELOPMENT OF POLICING FACILITIES WITHIN EMPLOYMENT AREAS</b>
<b>BRIEF</b>	<p>The Estate Strategy includes developing patrol bases in each borough for the main tasks of patrolling which include areas for briefing police officers, accommodation for police vehicles and administration. These may be stand alone facilities or be co-located with custody centres. There are a number already established in various boroughs, and they are found to be suitable for designated employment areas, which should be set out in policy such as this from Merton's Core Strategy.</p>
<b>EXAMPLE</b>	<p><b>LONDON BOROUGH OF HAVERING CORE STRATEGY AND DEVELOPMENT CONTROL POLICIES DEVELOPMENT PLAN DOCUMENT ADOPTED 2008 POLICY DC9: STRATEGIC INDUSTRIAL LOCATIONS</b></p> <p>Policy DC9 states:</p> <p>Police Patrol Bases are considered acceptable uses within Strategic Industrial Locations due to employment density levels and the nature of the use.</p>

	<p><b>LONDON BOROUGH OF MERTON DEVELOPMENT CONTROL DPD PREFERRED OPTIONS POLICY DCE1: DESIGNATED EMPLOYMENT AREAS</b></p> <p>Policy DCE1 states:</p> <p>...within the Main Employment Areas, planning permission will only be granted for light and general industry, research and development, warehousing and storage, office development, and <b>activities associated with the Metropolitan Police estate development strategy.</b></p>
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<b>ISSUE 3</b>	<b>DELIVERY OF POLICE SHOPS WITHIN TOWN CENTRES</b>
<b>BRIEF</b>	<p>An important aspect of the Estate Strategy is to provide accommodation that makes it easier for people to contact and meet police officers than is currently the case in old style police stations. The use of retail units in shopping streets or malls, or areas of publicly accessible buildings with high footfall such as libraries would help support the vitality and viability of the shopping centres as well as enhance the safety of these areas and the public buildings.</p>
<b>EXAMPLE</b>	<p><b>LONDON BOROUGH OF HAVERING CORE STRATEGY AND DEVELOPMENT CONTROL POLICIES DEVELOPMENT PLAN DOCUMENT ADOPTED 2008 POLICY DC16: CORE AND FRINGE FRONTAGES IN DISTRICT AND LOCAL CENTRES</b></p> <p>Policy DC16 states:</p> <p>Community uses for example police premises in shop units and health centres will be considered A2 uses provided they maintain an active frontage and are open during core retail hours and would not significantly harm the character, function and vitality and viability of the centre.</p>
	<p><b>LONDON BOROUGH OF BARKING AND DAGENHAM BARKING TOWN CENTRE AREA ACTION PLAN SUBMISSION VERSION SECTION 4.43 COMMUNITY FACILITIES</b></p> <p>It is stated within section 4.43:</p> <p>The Social Infrastructure Assessment and subsequent work on building the evidence base for the AAP has identified the need to provide various facilities. ... additional needs have been identified for:</p> <ul style="list-style-type: none"> <li>• A town centre police shop and "back office" space elsewhere in the AAP area</li> </ul>

ISSUE 4	POTENTIAL RECYCLING OF SURPLUS POLICE STATIONS
<b>BRIEF</b>	<p>The Metropolitan Police is responsible for procuring police facilities that are fit for purpose in the twenty first century. In doing so they are obliged to dispose of parts of the estate that no longer meet today's standards. This is a benefit for the communities as new beneficial uses can be found in some cases for the existing traditional buildings, and in others sites can become available for redevelopment as part of a comprehensive scheme, for example.</p> <p>It is important that LDF policies recognise the need to consider alternative uses once the original police facility has been relocated nearby in the area, and that it may be that a commercial use rather than a community use will be the most appropriate outcome for the site.</p>
<b>EXAMPLE</b>	<p><b>LONDON BOROUGH OF GREENWICH UNITARY DEVELOPMENT PLAN ADOPTED 2006 SAVED POLICY C2: LOSS OF COMMUNITY FACILITIES</b></p> <p>Policy C2 states:</p> <p>The existing UDP policy is a good example of a policy that acknowledges the need to consider redevelopment of premises for alternative uses where the community use has been relocated elsewhere in the local area:</p> <p>"Planning permission which would result in the loss of community facilities through change of use or re-development, will only be granted where:</p> <ul style="list-style-type: none"> <li>(i) Alternative community facilities of a similar nature are provided locally in the area within which that facility serves; or</li> <li>(ii) It would enable the implementation of a strategy for the provision of a community service in the Borough;</li> </ul>

ISSUE 5	PLANNING OBLIGATIONS FOR POLICING
<b>BREIF</b>	<p>It is anticipated that the significant levels of new development in London will increase demands on police resources and it is reasonable for planning contributions to be sought for policing need through planning obligations where these are consistent with the policy tests in Circular 05/05.</p>
<b>EXAMPLE</b>	<p><b>LONDON BOROUGH OF HILLINGDON PLANNING OBLIGATIONS SPD JULY 2008 PARAGRAPH 9.20 POLICING FACILITIES</b></p> <p>It is stated within paragraph 9.20:</p> <p>'In large development proposals, contributions may be</p>

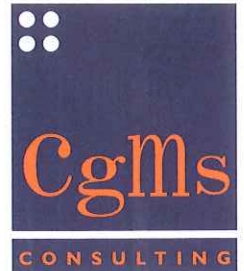
	<p>necessary to <b>mitigate the impact of additional strain on policing</b> through the direct provision of floorspace or a financial contribution to provide police facilities or infrastructure to ensure the safety of the area. The type of development that may qualify for such obligations will be those likely to generate a significant increase in strain on policing for example large residential, mixed use or town centre expansion schemes where designing out crime or other community safety measures may not adequately address potential impacts. These obligations are to be negotiated on a case by case basis.'</p>
	<p><b>LONDON BOROUGH OF LAMBETH</b>  <b>S106 PLANNING OBLIGATIONS SPD ADOPTED JULY 2008</b>  <b>POLICY C5: POLICING RESOURCES AND OTHER EMERGENCY SERVICES</b></p> <p>Policy C5 states:</p> <ul style="list-style-type: none"> <li>• (3.8) Development resulting in the net increase in the number of residents, businesses, commercial, social and leisure activity in an area will increase the need for emergency services and police services. In parts of Lambeth police services will already be at capacity. New populations will require additional police services.</li> <li>• (3.8.1) The approach to emergency services and policing is supported by Policy 57 Planning Obligations.</li> </ul>
	<p><b>LONDON BOROUGH OF BROMLEY</b>  <b>BROMLEY TOWN CENTRE AREA ACTION PLAN SUBMISSION VERSION</b>  <b>POLICY BTC31: DEVELOPER CONTRIBUTIONS</b></p> <p>Policy BTC 31 states:</p> <p>Residential and commercial developments in the town centre will be required to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and <b>social/community facilities</b> to be agreed with the Council taking into account other policies in the AAP.</p>

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26 November 2010

Dear Sir/Madam

**REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY/SERVICE  
DEVELOPMENT MANAGEMENT POLICIES DOCUMENT - PREFERRED  
OPTIONS**

I write on behalf of our client the Metropolitan Police Authority/Service (MPA/S) with regard to the above document. The MPA/S provide a vital community service to the borough of Barnet and policing is now recognised within the 2008 London Plan as being an integral part of social infrastructure.

**Context to MPA/S' Representations**

CgMs made representations on behalf of the MPA to the Core Strategy Issues and Options document in September 2008 and the Core Strategy Direction of Travel document in January 2010. Representations have been made on the Core Strategy Proposed Submission document which is out for consultation alongside the Development Management document.

A meeting was also held on 2 September 2009 in which Nick Lynch and Philip Osei-Mensah from the London Borough of Barnet and Matthew Roe and Julieanne Saxty from CgMs attended.

During this meeting, the MPA/S' Estate Strategy was outlined in detail and future policing requirements for the borough discussed. Following this meeting, examples of draft policies supporting the provision of police facilities from other London Boroughs were provided.

The importance of adequate policing facilities and their recognition as a community facility are acknowledged in both national and strategic planning policy. I refer below to relevant sections within the Development Management Policies Document and provide comment in order to ensure that the emerging policy documents reflect the strategic development plan in relation to policing. This is considered a strategically important issue regarding the Borough's future sustainable development, thus these documents are required to take account of policing needs.



## Representations

### *Policy DM02: Design considerations for development*

Paragraph 3.3.1 of the supporting text of this policy supports the principles of 'Secured by Design' when assessing the design of new developments. However, in order to ensure the policy is consistent with national and strategic guidance, in particular PPS1 and paragraph 4.114 of the London Plan, the MPA/S recommend that a minor amendment is made to the wording of Policy DM02 to ensure that the principles of Secured by Design are applied to all new developments.

***The MPA/S recommend that the second sentence is amended as follows (additional wording underlined):***

***The Council will require all new development to be designed to provide safety and security in the environment and reduce opportunities for crime and the fear of crime, in line with Secured by Design principles.***

### *Policy DM09: Development principles in the town centres*

Policy DM09 states that the Council will expect a suitable mix of appropriate town centre uses as part of development within town centres. It also seeks to protect the change of use of A1 uses and lists a number of acceptable alternative uses which may be acceptable providing the A1 use is no longer viable. The MPA/S supports the inclusion of community uses as acceptable uses within primary and secondary frontages provided that they present an active street frontage.

### *Policy DM11: Community and education uses*

The supporting text of Policy DM11 sets out the Council's strategy for the protection of community and education uses. Paragraph 12.1.4 lists recognised community and education uses, including health centres, schools, cinemas and places of worship. The MPA/S note that there is no reference to policing facilities within this policy (or anywhere else in this document).

The MPA/S wish to highlight the need for increased policing facilities in the borough to ensure safe and secure communities are created. This reflects the national guidance of PPS1 which states (paragraph 27 (iii)) that development plans should promote safe and crime free communities.

It is essential that the Council ensures the emerging Development Management Policies document also reflects the strategic development plan, with regard to the definition of community infrastructure. Policing facilities are defined within Policies 3A.17 and 3A.18 of the adopted London Plan as a community facility and the emerging London Plan specifically includes 'Policing' within the Social Infrastructure definition. Furthermore, draft Policy 3.17 states that development proposals should support the provision of additional social infrastructure mindful of strategic and local need.

It is clear that the provision of appropriate policing facilities is supported at a strategic level and that therefore this should be reflected in the emerging Development Management Policies document – as required by PPS12. In order to ensure the emerging document can be judged 'sound' it is thus recommended that policing is included as a community use within Policy DM11, as set out below, in

order to ensure existing and future residents and visitors have access to adequate policing facilities.

Acting on behalf of the MPA/S, CgMs have also made representations towards Barnet's Core Strategy Proposed Submission document Policy CS10. The letter includes the recommendation that policing facilities be included within the list of community facilities and includes a detailed policy justification for this.

***The MPA/S therefore recommend that supporting paragraph 12.1.4 of Policy DM11 is amended to read (additional wording underlined):***

***Community and education uses include Class D1 (Non-residential institutions) D2 uses (Assembly and Leisure) - e.g. health centres, dentists, schools & further education, spaces for the arts, museums, libraries, community halls and other public meeting venues, theatres, cinemas, policing facilities, indoor and outdoor sports facilities and places of worship.***

Policy DM11 states that the loss of any community/educational facility or use will only be acceptable in exceptional circumstances where new facilities of at least the equivalent quality or quantity are provided on the site or at an alternative location more accessible to users; or improvements are made to such facilities at other sites; or there is an excess of such facilities in the area.

***The MPA/S support this policy as it is consistent with national and strategic guidance which states that the net loss of community facilities must be resisted.***

*Policy DM12: New and existing employment sites*

This policy seeks to protect Employment spaces in the borough 'where viable'.

The MPA/S have identified the potential of employment sites in helping to deliver their operational objectives by providing strategic custody and patrol facilities on a Borough or Sub-Regional basis, or to provide Pan-London facilities, where appropriate. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similarly designated locations.

This approach is supported by Policy 3B.4 of the London Plan which in dealing with Industrial Locations states that policies in DPDs "*should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure.*" Furthermore, emerging Policy 2.17 of the draft London Plan which deals with Strategic industrial locations defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. It is clearly demonstrated above that particular policing uses are essentially industrial and that the Development Management Policies document should therefore reflect this.

It is also further demonstrated that certain policing uses will also fulfil the strategic requirement regarding the provision of social infrastructure. Policy CS8 of CgMs' representation letter submitted as part of the Core Strategy consultation provides a detailed policy justification for the provision of policing facilities on employment sites.

Mindful of the above and in order to comply with strategic policy in this regard, reference should be made after the third paragraph of Policy DM12 to the provision of social infrastructure, including policing, as appropriate alternative uses on employment land.

***The MPA/S therefore recommend that Policy DM12 should be expanded as follows (additional wording underlined):***

***... a suitable period of active marketing has been undertaken.***

***Where appropriate employment sites may also accommodate alternative employment-generating uses, including community uses.***

***Loss of office sites in town centres...***

*Policy DM14: Parking standards and travel impact*

This Policy seeks to apply the London Plan parking standards to all planning applications (excluding residential developments for which specific standards are set out). However, the MPA/S recommend that reference should be made within this policy to specialised land uses, where the parking requirement should be assessed on an individual basis. The policy should therefore be expanded to include reference to meeting operational need. This is supported by the schedule of early suggested textual changes to the draft London Plan (published in May 2010) which seeks to ensure that the provision for parking at ambulance, fire and policing facilities will be assessed on their own merit.

***The MPA/S recommend that the third paragraph of Policy DM14 be expanded to include (additional wording underlined):***

***Car parking provision should not exceed these standards. However, The parking requirements for specialised land uses, such as ambulance, fire and policing facilities will be assessed on an individual basis, having regard to the operational need of a particular use.***

***Parking proposals that detrimentally affect highway safety or residential amenity will be refused.***

We trust this is appropriate and the objectives of the MPA/S will be reflected in the emerging Development Management document. Please do not hesitate to contact myself or Sophie Jamieson should you have any queries.

Yours faithfully



**Alun Evans**  
**Senior Associate Director**

c.c. Metropolitan Police Authority

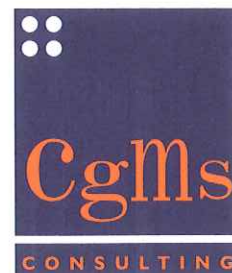
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26 November 2010

Dear Sir/Madam

**REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY/SERVICE  
CORE STRATEGY - PUBLICATION STAGE**

I write on behalf of our client the Metropolitan Police Authority/Service (MPA/S) with regard to the above document. The MPA/S provide a vital community service to the borough of Barnet and policing is now recognised within the 2008 London Plan as being an integral part of social infrastructure.

**Context to MPA's Representations**

CgMs made representations on behalf of the MPA to the Core Strategy Issues and Options document in September 2008 and the Core Strategy Direction of Travel document in January 2010. A meeting was also held on 2 September 2009 in which Nick Lynch and Philip Osei-Mensah from the London Borough of Barnet and Matthew Roe and Julieanne Saxty from CgMs.

During this meeting, the MPA/S' Estate Strategy was outlined in detail and future policing requirements for the borough discussed. Following this meeting, examples of draft policies supporting the provision of police facilities from other London Boroughs were provided.

I draw your attention 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 Barnet.



I therefore provide a synopsis of relevant Government Guidance and Planning Policy immediately below the full details of which were provided in CgMs' previous representation letters in respect of the Core Strategy.

#### 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.

It is clear therefore that a planning policy framework exists at National and strategic levels that protects and promotes policing as a community use. Government guidance within Planning Policy Statement 12 (PPS12) states that Local Development Framework Documents should reflect the strategic development plan (Para 4.2). The policy context above identifies the requirement for policing needs to be taken into consideration in the formulation of local policy documents and as such it is important for this policy context to be reflected within the emerging Core Strategy.

Mindful of the above, further representations regarding the Core Strategy which reflect policing needs and which ensure that the emerging policy document will reflect national planning guidance are made below.

#### **Representations to the Publication Stage document**

##### *Chapter 1- Introduction*

Paragraph 1.2.2 highlights the MPA as a Local Strategic Partner. ***The MPA/S support the opportunity to work alongside Barnet and therefore continue to support this reference.***

##### *Chapter 6 Vision and objectives*

Paragraph 6.2.1 highlights the core objectives to deliver the borough's vision. The MPA/S support the inclusion of policing as a recognised community facility under the heading '*to meet social infrastructure*'.

However, under the heading '*To promote strong and cohesive communities*' the MPA/S previously made representations to include reference to policing facilities, however this was not taken on board. The MPA/S wish to reiterate the need for appropriate policing facilities in the borough which will ensure safe and secure communities are created and maintained. This reflects the national guidance within PPS1 which states (paragraph 27 (iii)) that development plans should promote safe and crime free communities. PPS12 requires that emerging development plan policy reflects the strategic development plan (London Plan)

and mindful of this policy context (see above), it is clear that appropriate alterations are made to Paragraph 6.2.1.

***Recommendation: The MPA/S wish to make the following amendment to this bullet point in order that the emerging core strategy reflects national guidance (additional wording underlined):***

- ***To create the conditions for a safer and more secure Barnet by designing out crime and reducing anti-social behaviour, particularly in known 'hotspots', and through supporting enhancements to policing facilities.***

*Policy CS 5 - Protecting and enhancing Barnet's character to create high quality places*

The MPA/S continue to support the development of safe and attractive building layouts, and support the reference to 'Secured by Design' principles within the supporting text of Policy CS 5.

*Policy CS 6 - Promoting Barnet's town centres*

Policy CS 6 deals with uses in Barnet's town centres. As put forward in our previous representations, the MPA/S foresee the introduction of police facilities that enable better public access to police in town centres as an integral part of their future estate. They will increase opportunity for the community to interact with police officers and will increase accessibility for neighbourhood policing. Preferably these police facilities will be located in town and retail centres where footfall is high and they are therefore easily accessible to the public. Such police facilities will add to the vitality of town centres by providing an increased perception of safety and security.

Mindful of the above, it is considered that a planning policy basis to support community facilities such as police facilities that enable better public access to police in LB Barnet would not prejudice the supply of retail floorspace in town centres or the nature of these town centres in the Borough.

Further, such a planning policy basis complies with London Plan Policy 3A.18 which states policies in DPDs should assess the need for social infrastructure and community facilities, such as policing, in their area. It further states that policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport for the population that use them.

Both the LB of Havering and LB of Barking and Dagenham have included policing facilities as appropriate town centre uses within their emerging and adopted policy documents. For details of wording please refer to the attached Briefing Note which was sent to the LPA on 21 October 2009,

***Mindful of the above, the following alterations to Policy CS 6 is requested (additional wording underlined):-***

- ***We will ensure the efficient use of land and buildings in town centres, encouraging a mix of compatible uses including retail, managed affordable and flexible workspace, community facilities such as policing, leisure and residential that add to the vibrancy of the area whilst respecting character;***



### *Policy CS 8 - Promoting a strong and prosperous Barnet*

Chapter 13 highlights the borough's future strategy for employment land. The MPA/S are content in principle with the approach in Policy CS 8 - Promoting a strong and prosperous Barnet, which promotes the protection of employment sites in the borough however this is on the basis that policing facilities are considered acceptable on such land.

The MPA/S have identified the potential of relevant employment sites in helping them meet the goals of their estate strategy. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MPA/S' estate strategy. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similar locations.

Whilst falling outside the 'B' Use Class definition, these policing uses are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.

It is demonstrated above that the policy requirement to provide employment uses within designated existing employment sites can be met through the provision of appropriate policing facilities on such land. Mindful of this, policing uses can be appropriately located within existing employment sites. Furthermore, it is considered that a planning policy basis as suggested below to support appropriate policing facilities on employment sites in LB Barnet would not prejudice current or future employment land supply across the borough, as such uses are compatible with the requirement to provide employment opportunity. This is been accepted by a number of London Borough's which have approved policing facilities on employment/industrial land, including Enfield (Cambridge Business Park), Haringey (Quicksilver Place) and Greenwich (Warspite Road).

The LB of Havering have recognised policing facilities as appropriate uses within Strategic Industrial Locations as part of their adopted Core Strategy and Development Control Policies document. In addition, the LB of Merton have specifically made reference to the Metropolitan Police Estate as a suitable use within defined Employment Areas. As above, a Briefing Note containing extracts of these policies is attached.

This approach is supported by the strategic development plan within Policy 3B.4. Industrial Locations which states that policies in DPD's 'should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure.' Furthermore, Policy 2.17 Strategic industrial locations of the Emerging London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. It is clearly demonstrated above that particular policing uses are essentially industrial and that the emerging Core Strategy should therefore reflect this. It is also further demonstrated that certain policing uses will also fulfil the strategic requirement regarding the provision of social infrastructure.

In order to comply with strategic policy in this regard the following alterations to Policy CS 6 are recommended below.

**Recommendation: The MPA/S recommend that Policy CS 8 be amended to allow for policing facilities on surplus employment land (additional wording underlined).**

- **safeguarding existing employment sites that meet the needs of modern business and where appropriate, for that of emergency service providers. Development that improves or maintains the quality of existing employment provision and recognises employment-generating uses will be encouraged.**

*Policy CS 10 - Enabling Integrated Community Facilities and Uses*

This policy deals with the provision of community facilities. The MPA/S requested within their previous representations that policing facilities should be referred to within this section, in order to ensure the emerging Core Strategy reflects the London Plan. Unfortunately this was not taken on board and the MPA/S would therefore like to reiterate the importance of policing facilities being recognised as a community facility and the need to ensure that 'double counting' of replacement community facilities does not occur.

Policy 3A.18 of the London Plan includes police facilities within the definition of 'Community Facilities' and states that the *net* (my emphasis) loss of community facilities should be resisted. Mindful of this background, several London Borough's have made amendments to their emerging planning policy to support this approach, including Policy C2 of Greenwich's UDP (adopted 2006) and Policy CK 1 (section c, iii) of the Royal Borough of Kensington and Chelsea Core Strategy, which is expected to be adopted by the Council on 8 December 2010.

The MPA/S therefore recommend the following amendment to this policy to ensure this aspect of the emerging Core Strategy is consistent with the London Plan.

**Recommendation: The MPA/S suggest that the wording to this paragraph be changed to read (additional wording underlined):**

***The Council will work with our partners to ensure that community facilities including schools, policing facilities, libraries, leisure centres and pools, community meeting places and facilities for younger and older people are provided for Barnet's communities.***

**We will:**

- **'resist any development that would lead to a net loss of community facilities. Replacement community facilities elsewhere in the borough will be acceptable in line with a current strategy for re-provision'**

*Chapter 17 Making Barnet a safer place*

Paragraph 17.1.6 of this chapter states that the Borough will expect development proposals to reflect guidance in the government publication Safer Places: The Planning System and Crime Prevention (2004) and the principles of Secured by Design the official UK Police flagship initiative for 'designing out crime'. **The MP/S support this statement.**



Paragraph 17.1.7 states that greater collaboration with the Metropolitan Police and Barnet Safer Communities Partnerships is desired. ***The MPA/S support this statement.***

*Policy CS 12 (Making Barnet a safer place)*

Policy CS 12 highlights the Borough's strategy to make Barnet a safer place. ***The MPA/S support the 7 bullet points within this policy and support the reference to working alongside the MPA. However, one minor amendment is recommended to the third bullet point of the policy to ensure the future delivery of policing facilities in line with the MPA/S' Estate Strategy (additional wording underlined):***

- ***Support the work of Safer ~~Neighbourhood Teams~~ neighbourhood policing teams to make our neighbourhoods safer places to live in, work in and visit;***

*Chapter 20 Delivering the Core Strategy*

The MPA/S are continually monitoring their needs in Barnet and across London and they wish to have the flexibility to respond to policing needs if and when they arise. It is believed that purely relying on the formula based approach within the Community Infrastructure Levy at this stage is too simplistic and doesn't fully reflect the MPA's estate strategy.

One of the most effective ways to ensure the delivery of the aims of the Barnet's IDP is to secure the delivery of floorspace and other obligations through S106 agreements and to influence planning policy and development proposals. This has proven to be the most successful way of delivering the MPA's estate needs and providing police facilities where they are needed. As the Policy context evolves and CIL charging schedules are finalised, it may be appropriate to secure policing contributions in this manner, however it is essential that the emerging Barnet Core Strategy reflects current strategic policy.

Policy 3A.26 of the London Plan requires LPAs to ensure communities benefit from development including through Section 106 agreements and improving safety and security. The MPA/S therefore recommend that reference is made within Chapter 20 to planning obligations being secured through the traditional Section 106 route and the use of CIL, where appropriate in order to ensure that the impact of future large-scale development upon policing is mitigated. Reference to the use of S106 agreements or CIL will ensure that the local development plan policy reflects national and strategic policies and can therefore be judged 'sound'.

***Recommendation: The MPA/S recommend that the traditional S106 route for the provision for policing should remain alongside any introduction of CIL. Therefore the following alteration is recommended to section 20.7.1 (additional wording underlined):***

- ***'Negotiated planning obligations will still be possible for site specific issues including community uses and to allow for affordable housing to be delivered on site'.***

Part 20.8 of this section deals with Planning obligations. A list of proposed items for which planning obligations will be sought is outlined in section 20.8.3. The MPA/S are aware that significant additional development is likely to come forward

in the borough which may increase demands on community facilities such as police facilities. Policy 3A.18 of the London Plan states that policies in DPDs should assess the need for social infrastructure and community facilities (including police facilities) in their area, and ensure that they are capable of being met wherever possible. Policy 3A.26 of the London Plan also highlights the importance of '*ensuring communities benefit from development including through Section 106 agreements*' and improving safety and security. The MPA therefore request that the impact of development upon policing be taken into account in this section. This can be delivered through S106 agreements where these are consistent with the policy tests in Circular 05/05.

***Recommendation: In order to ensure the Core Strategy complies with the statutory development plan policy it is requested that an additional point is added to the list within section 20.8.3 to include (additional wording underlined):***

- ***policing;***

We trust this is appropriate and the objectives of the MPA/S will be reflected in the emerging Core Strategy. Please do not hesitate to contact myself or Sophie Jamieson should you have any queries.

Yours faithfully



**Alun Evans**  
**Senior Associate Director**

c.c. Metropolitan Police Authority

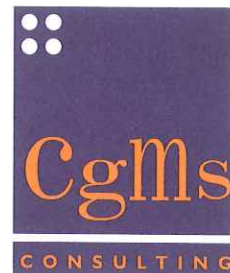


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8 June 2011

Dear Sir/Madam

**REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY/SERVICE  
DEVELOPMENT MANAGEMENT POLICIES DOCUMENT -  
SUBMISSION DRAFT**

I write on behalf of our client the Metropolitan Police Authority/Service (MPA/S) with regard to the above document. The MPA/S provide a vital community service to the borough of Barnet and policing is now recognised within the 2008 London Plan as being an integral part of social infrastructure.

**Context to MPA/S' Representations**

CgMs made representations on behalf of the MPA/S to the Core Strategy Issues and Options document in September 2008, the Direction of Travel document in January 2010 and most recently, to the Preferred Approach document in November 2010. Representations have been made on the Core Strategy Pre-Submission Amendments document which is out for consultation alongside the Development Management Policies DPD.

A meeting was also held on 2 September 2009 in which Nick Lynch and Philip Osei-Mensah from the London Borough of Barnet and Matthew Roe and Julieanne Saxty from CgMs attended.

During this meeting, the MPA/S' Estate Strategy was outlined in detail and future policing requirements for the borough discussed. Following this meeting, examples of draft policies supporting the provision of police facilities from other London Boroughs were provided.

The importance of adequate policing facilities and their recognition as a community facility are acknowledged in both national and strategic planning policy. I refer below to the relevant section within the Development Management Policies DPD and provide comment in order to ensure that the emerging policy reflects the strategic development plan in relation to policing.

## Representations

### *Policy DM14: New and existing employment sites*

This policy seeks to protect Employment spaces in the borough 'where viable'.

The MPA/S have identified the potential of relevant employment sites in helping them meet the goals of their estate strategy. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MPA/S' estate strategy. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similar locations.

Whilst falling outside the 'B' Use Class definition, these policing uses are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.

It is demonstrated above that the policy requirement to provide employment uses within designated existing employment sites can be met through the provision of appropriate policing facilities on such land. Mindful of this, policing uses can be appropriately located within existing employment sites. Furthermore, it is considered that a planning policy basis as suggested below to support appropriate policing facilities on employment sites in LB Barnet would not prejudice current or future employment land supply across the borough, as such uses are compatible with the requirement to provide employment opportunity. This is been accepted by a number of London Borough's which have approved policing facilities on employment/industrial land, including Enfield (Cambridge Business Park), Haringey (Quicksilver Place) and Greenwich (Warspite Road).

The LB of Havering have recognised policing facilities as appropriate uses within Strategic Industrial Locations as part of their adopted Core Strategy and Development Control Policies document. In addition, the LB of Merton have specifically made reference to the Metropolitan Police Estate as a suitable use within defined Employment Areas.

This approach is supported by the strategic development plan within Policy 3B.4. Industrial Locations which states that policies in DPD's 'should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure.' Furthermore, Policy 2.17 of the Emerging London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. It is clearly demonstrated above that particular policing uses are essentially industrial and that the emerging Development Management Policies DPD should therefore reflect this. It is also further demonstrated that certain policing uses will also fulfil the strategic requirement regarding the provision of social infrastructure.

Mindful of the above and in order to comply with strategic policy in this regard, reference should be made within Policy DM14 to the provision of social infrastructure, including policing, as appropriate alternative uses on employment sites.



***The MPA/S therefore recommend that point ii of Policy DM14 should be expanded as follows (additional wording underlined):***

***...Where this can be demonstrated the priority for re-use will be a mixture of small business units with residential use. Where appropriate employment sites may also accommodate alternative employment-generating uses.***

We trust this is appropriate and the objectives of the MPA/S will be reflected in the emerging Development Management Policies DPD. Please do not hesitate to contact myself or Sophie Jamieson should you have any queries.

Yours faithfully



**Alun Evans**  
**Senior Associate Director**

c.c. Metropolitan Police Authority



## **Appendix C**

### **Section 17 of the Crime and Disorder Act**



# Crime and Disorder Act 1998

## 1998 CHAPTER 37

### ARRANGEMENT OF SECTIONS

#### PART I

##### PREVENTION OF CRIME AND DISORDER

#### CHAPTER I

##### ENGLAND AND WALES

###### *Crime and disorder: general*

1. Anti-social behaviour orders.
2. Sex offender orders.
3. Sex offender orders: supplemental.
4. Appeals against orders.

###### *Crime and disorder strategies*

5. Authorities responsible for strategies.
6. Formulation and implementation of strategies.
7. Supplemental.

###### *Youth crime and disorder*

8. Parenting orders.
9. Parenting orders: supplemental.
10. Appeals against parenting orders.
11. Child safety orders.
12. Child safety orders: supplemental.
13. Appeals against child safety orders.
14. Local child curfew schemes.
15. Contravention of curfew notices.
16. Removal of truants to designated premises etc.

###### *Miscellaneous and supplemental*

17. Duty to consider crime and disorder implications.
18. Interpretation etc. of Chapter I.

#### CHAPTER II

##### SCOTLAND

19. Anti-social behaviour orders.
20. Sex offender orders.
21. Procedural provisions with respect to orders.
22. Offences in connection with breach of orders.
23. Anti-social behaviour as ground of eviction.
24. Noise-making equipment: police power of seizure.

#### CHAPTER III

##### GREAT BRITAIN

25. Powers to require removal of masks etc.
26. Retention and disposal of things seized.
27. Power of arrest for failure to comply with requirement.

#### PART II

"school" has the same meaning as in the [1996 c. 56.] Education Act 1996.

*Miscellaneous and supplemental*

**17 Duty to consider crime and disorder implications**

- (1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.
- (2) This section applies to a local authority, a joint authority, a police authority, a National Park authority and the Broads Authority.
- (3) In this section—
  - "local authority" means a local authority within the meaning given by section 270(1) of the [1972 c. 70.] Local Government Act 1972 or the Common Council of the City of London;
  - "joint authority" has the same meaning as in the [1985 c. 51.] Local Government Act 1985;
  - "National Park authority" means an authority established under section 63 of the [1995 c. 25.] Environment Act 1995.

**18 Interpretation etc. of Chapter I**

- (1) In this Chapter—
  - "anti-social behaviour order" has the meaning given by section 1(4) above;
  - "chief officer of police" has the meaning given by section 101(1) of the [1996 c. 16.] Police Act 1996;
  - "child safety order" has the meaning given by section 11(1) above;
  - "curfew notice" has the meaning given by section 14(6) above;
  - "local child curfew scheme" has the meaning given by section 14(1) above;
  - "parenting order" has the meaning given by section 8(4) above;
  - "police area" has the meaning given by section 1(2) of the [1996 c. 16.] Police Act 1996;
  - "police authority" has the meaning given by section 101(1) of that Act;
  - "responsible officer"—
    - (a) in relation to a parenting order, has the meaning given by section 8(8) above;
    - (b) in relation to a child safety order, has the meaning given by section 11(8) above;
  - "sex offender order" has the meaning given by section 2(3) above.
- (2) In this Chapter, unless the contrary intention appears, expressions which are also used in Part I of the [1991 c. 53.] Criminal Justice Act 1991 ("the 1991 Act") have the same meanings as in that Part.
- (3) Where directions under a parenting order are to be given by a probation officer, the probation officer shall be an officer appointed for or assigned to the petty sessions area within which it appears to the court that the child or, as the case may be, the parent resides or will reside.
- (4) Where the supervision under a child safety order is to be provided, or directions under a parenting order are to be given, by—
  - (a) a social worker of a local authority social services department; or
  - (b) a member of a youth offending team,the social worker or member shall be a social worker of, or a member of a youth offending team established by, the local authority within whose area it appears to the court that the child or, as the case may be, the parent resides or will reside.
- (5) For the purposes of this Chapter the Inner Temple and the Middle Temple form part of the City of London.

**CHAPTER II**

**SCOTLAND**

**19 Anti-social behaviour orders**

- (1) A local authority may make an application for an order under this section if it appears to the authority that the following conditions are fulfilled with respect to any person of or over the age of 16, namely—
  - (a) that the person has—
    - (i) acted in an anti-social manner, that is to say, in a manner that caused or was likely to cause alarm or distress; or
    - (ii) pursued a course of anti-social conduct, that is to say, pursued a course of conduct that caused or was likely to cause alarm or distress,to one or more persons not of the same household as himself in the authority's area (and in this section "anti-social acts" and "anti-social conduct" shall be construed accordingly); and
  - (b) that such an order is necessary to protect persons in the authority's area from further anti-social acts or conduct by him.
- (2) An application under subsection (1) above shall be made by summary application to the sheriff within whose

## **Appendix D**

### **Planning Inspectorate Note No.953**



## The Planning Inspectorate

# PINS NOTE 953

To: All Inspectors

Date of Issue: June 2005

Currency: until further notice

### SECTION 17 OF THE CRIME AND DISORDER ACT 1998

#### Background

1. PINS Note 717 informed Inspectors that [s17 of the Crime and Disorder Act 1998](#) is not a material planning consideration and its use in planning decisions may be ultra vires and potentially challengeable. This guidance was based on advice we received from DETR Legal. However, following further recent discussions with ODPM Legal we have learnt that this advice is not entirely correct.

2. We have now been advised that a LPA must have regard to s17 in exercising its functions as a planning authority. These will include the formulation of planning policy and the determination of planning applications. However, s17 does not bind the First Secretary of State as it relates to the exercise of functions by a LPA and the FSS is not under the same duty to have regard to it. He cannot therefore use s17 as a means of justifying a particular decision. Nevertheless, although s17 itself is not a material consideration as far as the FSS is concerned, its subject matter - crime prevention - can still be a material consideration in determining an appeal.

#### Action

3. In examining the soundness of a development plan it is in order for an Inspector to evaluate draft policies prepared by a LPA according to its duties under s17. However, s17 would not, in itself, be material to an Inspector's consideration of a planning application in cases where the LPA has relied on such policies. Where a LPA has referred to s17 as the basis for, or as one of the reasons for, reaching its decision, Inspectors should continue to make their decisions in accordance with [s38 \(6\) of the Planning and Compulsory Purchase Act 2004](#) but they should take crime prevention into account as a material consideration (where this is relevant) and should show that they have dealt with the issue on the basis of the advice in [PPS1: Delivering Sustainable Development](#) and [Safer Places: The Planning System and Crime Prevention](#).

4. It is suggested that in appeals where the parties have referred to s17 Inspectors should deal with the matter by saying the following :

*"I note that the [local planning authority or whichever party] has referred to s17 of the Crime and Disorder Act 1998 [as the basis for (or as one of the reasons for) reaching its decision]. However, s17 relates to the exercise of functions by a local planning authority and the First Secretary of State is not under the same duty to have regard to it. Nevertheless, while s17 is not, in itself, a material consideration for the First Secretary of State, its subject matter - crime prevention - may be a material consideration in determining an appeal."*

6. PINS Note 717 is hereby cancelled.