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12th October 2012

Dear Sirs

HARINGEY LOCAL PLAN: STRATEGIC POLICIES INSPECTOR'S TABLE OF MAIN MODIFICATIONS

COMMENTS ON BEHALF OF THE MAYOR'S OFFICE FOR POLICING AND CRIME (MOPAC)/METROPOLITAN POLICE SERVICE (MPS)

I write on behalf of our client, the Mayor's Office for Policing and Crime (MOPAC)/Metropolitan Police Service (MPS), with regard to the above document.

We previously submitted representations on behalf of the MOPAC/MPS in respect of the Core Strategy (now Local Plan: Strategic Policies) at each consultation stage and to the Examination in Public.

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

Representations and Comments to the Inspector's Table of Main Modifications

Policy SP8 Employment

The revisions set out to the Local Plan: Strategic Policies do not include any changes to Policy SP8 Employment or its supporting text in respect of allowing uses similar in nature to B Class uses, such as policing facilities, in Locally Significant Industrial Sites.

Since the submission of our written statement to the Examination on behalf of the MOPAC/MPS in June 2011 on this issue, the London Plan (July 2011) and National Planning Policy Framework (NPPF March 2012) have been published. It is considered that these combined with other material considerations justify such a change, and that the same change is now also necessary in respect of Strategic Industrial Locations (SILs).

When assessing Policy SP8 against the NPPF, it is considered that it does not meet the requirements of soundness (NPPF paragraph 182) in that the policy is inconsistent with national policy. It is also not effective in terms of being flexible to ensure the delivery of infrastructure to meet changing needs. The delivery of non B use class employment generating uses, which



are appropriate in SILs and LSISs is wrongly prohibited. It could result in the MOPAC/MPS having difficulty or being unable to deliver a facility where there is a need and is not considered to meet the requirements of the NPPF, as set out below.

National Planning Policy Framework (NPPF)

Paragraph 70 of the NPPF seeks to ensure the delivery of social facilities and services to meet the needs of the community. The third bullet point notes that planning policies should ensure that facilities and services are able to develop and modernise in a way that is sustainable, whilst the fourth bullet point requires planning policies to ensure an integrated approach to considering the location of community services.

Paragraph 157 of the NPPF highlights that local plans should plan positively for the development and infrastructure required in the area and be based on co-operation with public sector organisations. This is consistent with the final bullet point of paragraph 17 of the NPPF which requires local authorities to 'take account of and support local strategies to improve health social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs'.

Adopted London Plan (July 2011)

The following policies demonstrate the Mayor's support for the police and policing requirements. The Local Plan: Strategic Policies document must reflect this policy framework.

Paragraph 2.79 of the London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations.

Paragraph 2.84 states that development in SILs for non-industrial or related uses should be resisted other than as part of a strategically co-ordinated process of consolidation and some other cases and that '*Policing and other community safety infrastructure may also be appropriate uses in these locations.*' Paragraph 4.23 adds that the '*Redevelopment of surplus industrial land should address strategic and local objectives particularly for housing, and for social infrastructure such as education, emergency services and community activities.*'

Policy 3.16 Protection and Enhancement of Social Infrastructure states that '*London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population.*' It also states that '*Boroughs should ensure that adequate social infrastructure provision is made to support new developments.*' Paragraph 3.86 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.

London Plan (July 2011) paragraph 4.23 states that '*Redevelopment of surplus industrial land should address strategic and local objectives particularly for housing, and for social infrastructure such as education, emergency services and community activities.*' Policy DM17 does not currently conform with this. The London Plan in allowing redevelopment of industrial sites does not require the B Class Use to be reprovided on site.

Furthermore, Policy 7.13 states that the Mayor will work with relevant stakeholders and others to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related

hazards. Part C of Policy 7.13 requires local planning authorities to work with the Mayor and other stakeholders to ensure their LDF policies provide for the spatial aspect of London's emergency plans and safeguard them so that London remains resilient against, and well able to cope with, emergencies, with minimal loss of life or property.

Regard should also be had to other material considerations, such as the Crime and Disorder Act, Planning Inspectorate Note No. 953 and examples of where this policy approach has been found sound for other London boroughs, as detailed in the Hearing Statement.

Recommendation: The document can be made sound through recognition that policing facilities would be appropriate in Strategic Industrial Locations and Locally Significant Industrial Sites, ensuring consistency with national and regional policy.

I trust the above is taken on board. Should you have any queries or wish to discuss the nature of these comments and representations, please do not hesitate to contact either Vanessa Garner or myself at this office.

Yours faithfully



John N. Smith
Senior Associate Director

c.c. Metropolitan Police