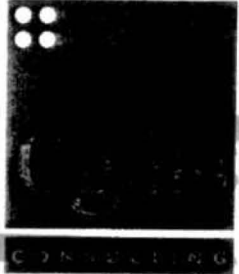


CGMS Consulting

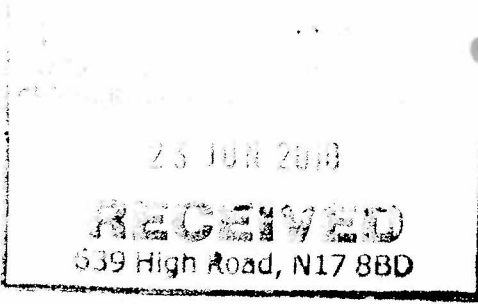
24



BY POST AND EMAIL ldf@haringey.gov.uk

Our Ref: JNS/VG/6349
Direct dial: 020 7832 1472
Email: john.smith@cgms.co.uk

Planning Policy
Freeport LON 11863
London Borough of Haringey
639 High Road
Tottenham
N17 8BD



Morley House
26 Holborn Viaduct
London EC1A 2AT
Tel: 020 7583 6767
Fax: 020 7583 2231
www.cgms.co.uk

Offices also at:
Birmingham, Cheltenham
Kettering, Newark

21st June 2010

Dear Sirs

CORE STRATEGY PROPOSED SUBMISSION, DEVELOPMENT MANAGEMENT POLICIES AND SITE ALLOCATIONS INITIAL CONSULTATION

REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE AUTHORITY (MPA)/METROPOLITAN POLICE SERVICE (MPS)

I write on behalf of our client the Metropolitan Police Authority (MPA)/Metropolitan Police Service (MPS) with regard to the above documents. CgMs previously submitted representations to the Core Strategy at the Issues and Options stage (31st March 2008) and the Preferred Options stage (30th June 2009) (copies attached).

Context to Representations

The Metropolitan Police provide a vital community service to the London Borough of Haringey and policing is recognised within the 2008 London Plan and the emerging London Plan as being an integral part of social infrastructure. Our previous representations to the Core Strategy have on the most part not been addressed by the LPA. The MPA/MPS consider that the minor changes proposed are required to ensure that the adopted Core Strategy is 'sound' and accurately reflects the most current MPA estate strategy.

Tests of Soundness - Core Strategy

PPS12 requires emerging development plan policy to be consistent with the adopted development and states that in order for a DPD to be sound it must be justified, effective and consistent with national policy. It further states that an Inspector is charged with checking that the submitted plan has regard to national policy, conforms generally to the Regional Spatial Strategy, and has regard to any sustainable community strategy for its area.

Therefore, in order to ensure that policies within the emerging Haringey Core Strategy comply with national guidance and the strategic development plan, thereby ensuring 'soundness', the relevant policy framework is set out. I then refer to the operational background in respect of particular policing uses and finally propose minor alterations to the policies. Where representations address the issue of soundness this will expressly stated, otherwise comments should be taken as comments.



Relevant Planning Policy

PPS1 states at paragraph 27 (iii) (Delivering Sustainable Development), 'in preparing development plans, planning authorities should seek to: promote communities which are healthy, safe and crime free...'.
'

London Plan Policy 3A.17 (Addressing the needs of London's diverse population) of the states: -

*'Policies in DPDs should identify the needs of the diverse groups in their area. They should address the spatial needs of these groups, and ensure that they are capable of being met wherever possible, both through general policies for development and specific policies relating to the provision of social infrastructure including healthcare and social care (Policy 3A.18), safety and security (Policy 4B.6), **policing facilities** (my emphasis), the public realm (Policy 4B.3)....'*

Policy 3A.18 (Protection and enhancement of social infrastructure and community facilities) states: -

*'Policies in DPDs should **assess the need for social infrastructure and community facilities in their area** (my emphasis), 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** (my emphasis), community halls, meeting rooms, places of worship, public toilets, facilities for cyclists, convenience shops, banking facilities and post offices (also see Chapter 3D). Adequate provision for these facilities is particularly important in major areas of new development and regeneration.'*

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.

London Plan Policy 3.B4 states: -

With strategic partners, the Mayor will promote, manage and where necessary protect the varied industrial offer of the Strategic Industrial Locations (SILs – Policy 2A.10), set out in Annex 2 as London's strategic reservoir of industrial capacity. Boroughs should identify SILs in DPDs, and develop local policies and criteria to manage Locally Significant and other, smaller industrial sites outside the SILs, having regard to (inter alia):

- *the potential for surplus industrial land (as defined in assessments) to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure and where appropriate, contribute to town centre renewal.*

Furthermore, emerging London Plan Policy 2.17 defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations.



Having outlined relevant government guidance and strategic development plan policies, the requested minor alterations are made within the context of the MPA's/MPS's operational need, below.

Proposed Changes to Submission Core Strategy

1.4 Challenges facing Haringey Crime and Safety

The MPA/MPS welcomes the identified need to tackle problems such as anti-social behaviour and create a safer place to live, and in 'designing out crime' (para 1.4.34-1.4.35). 402
7/1/14

2.1 Haringey's Spatial Strategy Mixed use developments

This seeks to ensure that increasing safety and security is achieved through mixed use development, and expects development proposals to contribute towards community facilities. The MPA/MPS support this, subject to community facilities including policing facilities. 403
7/2/14

SP1 - Managing Growth

This Policy sets out the predicted growth of the Growth Areas and Areas of Change within the Borough. The MPA/MPS welcome the recognition given to mitigate the impact of development including the delivery of new or replacement community facilities within these areas, and in Areas of Limited Change where major development is proposed in areas of local deficiencies (para 3.1.43). 405
7/3/14

SP5 - Water Management and Flooding

The MPA/MPS note that the Policy nor its supporting refer to the vulnerability of land uses, as set out in Table D.2 of PPS25, which is important in undertaking the Sequential and Exception Tests. We would wish to highlight that PPS25, has been amended to consider Police, ambulance and fire stations which are **not** required to be operational during flooding as a less vulnerable use. 406
7/4/14

Recommendation: The MPA/MPS therefore recommends that reference is included in the Core Strategy to the flood risk vulnerability classification set out in Table D.2 of PPS25.

SP7 - Transport

This Policy seeks to adopt maximum car parking standards. The MPA/MPS consider that for some uses there are operational requirements which need to be taken into account, and this should therefore be considered on an individual site basis. This is also not consistent with DMP12 which assesses parking on an individual site basis. 408
7/5/14

Recommendation: The MPA/MPS therefore recommends the following amendments (additional wording in italics) to the bullet points in SP7:

- Adopting maximum parking standard *wherever possible (to be considered on an individual site basis)*



SP8 - Employment

This Policy seeks to safeguard Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) for B uses. However it indicates in the supporting text that in LSISs it will seek to retain B uses or those that share strong similarities to this use (para 5.1.10). The MPA/MPS supports this approach for the reasons set out below.

The MPA have identified the potential of relevant employment space 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 industrial sites and therefore are ideally suited to Light Industrial Land and Employment Zone 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 light industrial land and employment zones can be met through the provision of appropriate policing facilities on such land. Mindful of this, policing uses can be appropriately located within employment designated land. To support appropriate policing facilities on designated industrial land in London Borough of Haringey 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), and Greenwich (Warspite Road), and Haringey itself (Quicksilver Place)

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 'B class' in nature 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 ensure consistency between the Policy and its supporting text the following alterations to Policy SP8 are recommended below.

Recommendation: The MPA/MPS therefore suggest the following amendments to SP8 (additional wording in italics):



...

Locally Significant Industrial Sites

The Council will safeguard the following site as Locally Significant Industrial Sites (LSIS) for a range of industrial uses (B1 (b), (C), B2, ~~and~~ B8 or uses that share strong similarities to these use classes) where they continue to meet demand and the needs of modern industry and business:

...

It also indicates that employment sites identified for alternative uses provide the opportunity to provide essential community infrastructure (para 5.1.12) and that flexibility will be shown for alternative uses that complement the employment uses or contribute to social infrastructure (para 5.1.18). The MPA/MPS support this approach, however is noted that social infrastructure is not defined with the Core Strategy, nor in the other Development Plan Documents.

Recommendation: The MPA/MPS therefore recommends that the term social infrastructure is replaced by community facilities (subject to this including policing facilities (see representations to the Glossary below)).

SP10 - Town Centres

This policy seek to promote and encourage development of a variety of uses within its centres including community facilities and services which meet community needs. The supporting text seeks to retain all A1 uses within primary frontage, but within the secondary frontages there may be greater flexibility about the proportion of non A1 uses that will be permitted (para 5.3.18). Community facilities are identified as one the preferred alternative uses to A1 (para 5.3.19).

The MPA/MPS support the flexibility to allow non A1 uses in secondary frontages, which would enable the provision of facilities which enable the public better access to policing, and the identification of community facilities as a preferred alternative to A1 uses, subject to this including policing facilities.

SP11 - Design

This Policy seeks the incorporation of solutions to reduce crime and the fear of crime, by applying the principles set out in 'Secure by Design' and achieve a high quality public realm that is safe to use. The MPA/MPS welcome the inclusion or reference to Secured by Design, however this has been spelled incorrectly. In addition, the MPA/MPS seek inclusion of reference to 'Safer Places'

Recommendation: The MPA/MPS therefore recommends the following amendments to Policy SP11 (additional wording in italics):

-
- Incorporate solutions to reduce crime and fear of crime by promoting social inclusion, and well-connected and high quality public realm that is easy and safe to use and by applying the principles set out in 'Secured by Design' and 'Safer Places';
- ...

SP12 - Conservation

This Policy highlights that development should protect, preserve and enhance listed buildings; preserve and enhance the character and appearance of



conservation areas and promote the conservation of locally listed buildings of merit. The MPA/MPS considers that the policy should be more flexible to take into account operational requirements.

The MPA/MPS estate within Haringey includes both listed and locally listed buildings, some of which fall within conservation areas. These designations already provide a degree of protection and in relation to conservation area or locally listed buildings the only permissible alteration without consent is for internal works.

Existing buildings have operational deficiencies including asbestos, insufficient space and small rooms and security issues. As operational police buildings it is preferable for necessary works that aid the buildings functionality to be permissible without undue restriction. In addition, to respond to the ageing estate the MPA/MPS have reviewed the delivery of their operational facilities and are looking to roll out refurbished, specialised, more appropriate premises to meet modern requirements. The future of existing facilities which are no longer fit for purpose will be released, as set out in the Asset Management Plan for Haringey. This release can be a benefit to communities as new beneficial uses can be found.

Recommendation: In light of the above, the MPA/MPS recommend that Policy SP12 should be more flexible to take account of operational need.

SP16 Community Infrastructure

This Policy seeks improvement and enhancements of community facilities and services and expects development that increases the demand for community facilities and services to make appropriate contributions towards providing new facilities or improving existing facilities. The MPA/MPS strongly support this approach, again assuming that policing facilities are considered a community facility. It is important that the impact of new development on policing is mitigated.

The MPA/MPS would also note that there is no reference within this policy or is supporting text of the need to ensure that there is no net loss approach to community facilities, as set out in London Plan Policy 3A.18.

Recommendation: The MPA/MPS therefore recommends that the no net loss approach to community facilities is incorporated into SP16, to ensure that it is in accordance with the London Plan.

Figure 8.2 Emergency Services

The MPA/MPS have reviewed the location of police facilities shown in Figure 8.2. The 5 Police Stations in the borough are all shown and in the correct location. However, there appears to be several issues with regards to the Safer Neighbourhood Teams, as set out in the table below:

Safer Neighbourhood Team Location	Comments
1 The Roundway, 472-480 Lordship Lane N17 7HA	Shown in the wrong location
The Collection, 73 Crouch Hall Rd, Crouch End N8 8HF	Shown in correct location
21-29 Tewksbury Road N15 6SE	Not shown
560-568 High Road, N17 9TA	Not shown
The Fishmongers Arms, 287 High Road, Wood Green N22 8HU	Not shown



9 Turnpike Parade, Green Lanes, N15 3EA	Shown in correct location
--	---------------------------

The MPA/MPS would also note that there is a Safer Neighbourhood Team located at Muswell Hill Police Station, and would therefore suggest the figure/key be amended to reflect this.

Recommendation: The MPA/MPS therefore recommend that Figure 8.2 be amended in line with the comments above.

8.2 Delivering and Monitoring the Core Strategy Planning Obligations

This indicates that planning obligations can be used to mitigate the impact of a development (para 8.2.12); that consideration will be given to adverse impacts that may arise from a development on emergency services and community facilities (para 8.2.13); and for planning obligations the Council will prioritise planning obligations, the list includes community facilities (8.2.15). Again, the MPA/MPS strongly support this approach, subject to community facilities including policing facilities.

Glossary

The MPA/MPS welcome the inclusion of a definition in the glossary of 'Secure by Design', but again would note that this should read 'Secured by Design' (see SP11 above).

The MPA/MPS seeks the inclusion of emergency services to include policing facilities within the definition of community facilities. This is critical to ensure that the current policy support within the Core Strategy for provision of community facilities does cover policing facilities within its remit. It is considered that at present the Core Strategy is unsound because it does not accord with the Strategic Development Plan which seeks to ensure that the need for social infrastructure and community facilities in the area is capable of being met wherever possible (Policy 3a.18), and includes specifically policing facilities. In addition a definition of emergency services could also be provided.

Recommendation: The MPA/MPS therefore recommend the following alterations to definitions in the Glossary (additional wording in italics):

- Community facilities: Community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, *facilities for emergency services, including police facilities*, education facilities, libraries, community halls, meeting rooms, places of worship and public toilets.
- *Emergency services: Includes Fire, Police, Ambulance services.*
- **Secured** by Design: The planning and design of street layouts, open space, and buildings so as to reduce the likelihood or fear of crime.

Proposed Changes to Development Management Policies DPD

DMP12 Parking for Development

This Policy seeks to apply the maximum parking standards. For larger developments the parking requirement will be assessed on an individual basis as part of the Transport Assessment or Statement. The MPA/MPS welcomes the



consideration of parking on an individual site basis, but the policy should be expanded to include reference to meeting operational need.

DMP14 Flood Risk, Water Courses and Water Management.

As with Core Strategy Policy SP5, the policy nor its supporting refer to the vulnerability of land uses, as set out in Table D.2 of PPS25, which is important in undertaking the Sequential and Exception Tests. We would wish to highlight that PPS25, which has been amended to consider Police, ambulance and fire stations which are **not** required to be operational during flooding as a less vulnerable use.

Recommendation: The MPA/MPS therefore recommends that reference is included in the Development Management Policies DPD to the flood risk vulnerability classification set out in Table D.2 of PPS25.

DMP16 Development Within and Outside of Town and Local Shopping Centres

This Policy indicates in f) that a mix of uses (i.e. not just retail but community facilities) should be included, where appropriate within the designated town and local shopping centres. The MPA/MPS supports this approach.

DMP17 Protection of Shops in Designated Shopping Areas

The MPA/MPS support the approach that community facilities are one of the preferred alternative uses to A1 (para 5.14), as in the Core Strategy. Paragraph 5.17 states that for parades and individual shops not identified in the Plan which no longer serve a function to the local community, the preferred non retail uses includes other uses of an appropriate size and scale for community purposes, including police facilities (5.17). The MPA/MPS welcomes the specific reference to police facilities in this regard. Such locations are ideal for policing facilities which enable the public better access to police services due to the high levels of footfall. They are considered to provide a similar footfall to an A2 unit and since the public can visit front counters, will not result in a dead frontage and therefore maintain the vitality and viability of frontages.

DMP19 – Employment Land & Premises

This Policy resists the redevelopment or change the use of land or buildings in employment land use. However if this would result in the retention of some permanent jobs as well as demonstrable wider regeneration benefits to the community it may be appropriate. The MPA/MPS support the ability to allow employment generating uses in such locations. For the reasons set out in response to Core Strategy Policy SP8 above, this would ensure that appropriate uses such as policing facilities could be delivered in such locations.

Para 5.31 indicates that flexibility will be shown for alternative uses that complement the employment uses and contribute to social infrastructure. The MPA/MPS supports this in part, principally because there is no definition provided in any of the Development Plan Documents for social infrastructure.

Recommendation: The MPA/MPS therefore recommends that the term social infrastructure is replaced by community facilities.

It is recognised in the supporting text that there is increasing demand for non employment generating uses, especially on surplus employment land, therefore, alternative uses such as community facilities may be appropriate (para 5.32).



Again, the MPA/MPS supports this approach, on the proviso that community facilities includes policing facilities.

DMP21 Quality Design

The MPA/MPS welcomes part 1) of this Policy which states that designing out crime and the fear of crime is an issue that should be addressed as part of the design of new development.

In the Policy nor its supporting text is therefore 'Secured by Design' or 'Safer Places'.

Recommendation: Since 'Secured by Design' has been included in the Core Strategy, it is considered that this document, which should contained detailed policies should include reference to this, as well as to 'Safer Places'.

Culture and Leisure

Paragraph 7.10 give a definition of community facilities it does not refer to policing specifically but does say '*...and those other uses that provide a service to the local community.*' The MPA/MPS seek to confirm that in this respect policing facilities are considered to be a vital service to the local community.

The MPA/MPS request that the above alterations are taken into account in the final Core Strategy and future versions of the Development Management Policies and Sites Allocations DPDs. 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

PP V Garner

John N. Smith
Senior Associate Director

c.c. Metropolitan Police

enc. Letter to LB of Haringey dated 31st March 2008
Letter to LB of Haringey dated 30th June 2009

