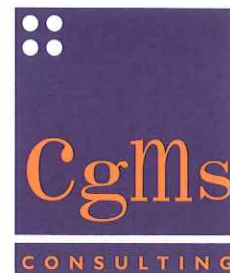


**BY POST AND EMAIL: [ldf@merton.gov.uk](mailto:ldf@merton.gov.uk)**

Our Ref: AE/BC/6214

Direct dial: 020 7832 1497  
Email: [alun.evans@cgms.co.uk](mailto:alun.evans@cgms.co.uk)

Strategic Policy and Research  
Future Merton  
London Borough of Merton  
12<sup>th</sup> Floor Civic Centre  
London Road  
Morden  
SM4 5DX



Morley House  
26 Holborn Viaduct  
London EC1A 2AT

Tel: 020 7583 6767  
Fax: 020 7583 2231

[www.cgms.co.uk](http://www.cgms.co.uk)

Offices also at:  
Birmingham, Cheltenham,  
Dorset, Kettering,  
Manchester, Newark

23 March 2012

Dear Sirs

**REPRESENTATIONS ON BEHALF OF THE MAYOR'S OFFICE FOR  
POLICING AND CRIME / METROPOLITAN POLICE SERVICE  
MERTON DRAFT SITES AND POLICIES DEVELOPMENT PLAN  
DOCUMENT AND DRAFT PROPOSALS MAP - CONSULTATION  
DRAFT**

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

The Mayor's Office for Policing and Crime and the Metropolitan Police Service provide a vital community service to the London Borough of Merton. It is essential that this key DPD supports the continued provision of policing to ensure a safe and secure borough.

**Policy context to representations**

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

*National Policy*

- PPS1 – paragraph 27 (iii) in development plan preparation the need to promote communities which are healthy, safe and crime free is highlighted. Paragraph 16 states that policy should deliver safe, healthy and attractive places to live.
- PPS4 – encourages LPAs to plan for centres and promote the location of town centre uses within designated centres.
- 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.
- Draft National Planning Policy Framework (July 2011) – one of the objectives of the NPPF is to deliver the right community facilities to meet local needs (para 124).

### *London Plan Policies*

- Policy 2.15 recognises police facilities as appropriate uses in town centres.
- Policy 2.17 includes policing facilities as acceptable uses within Strategic Industrial Locations.
- Policy 3.16 requires development proposals to support the provision of social infrastructure and resist the net loss of social facilities. Policing is included within the definition of social infrastructure.
- Paragraph 3.86 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.
- Policy 4.4 highlights the potential for surplus industrial land to help meet social infrastructure needs in appropriate locations.
- Policy 7.3 focuses upon the creation of safe and secure environments and seeks to ensure that developer adheres to the principles of Secured by Design.
- Policy 7.13 states that Boroughs should work with stakeholders to ensure London remains resilient to emergency and the subtext states the Metropolitan Police should be consulted as part of major development proposals.
- Policy 8.2 requires development proposals to address strategic as well as local priorities in planning obligations. Boroughs should set out a clear framework for negotiations on planning obligations in their LDF to ensure that *'it will be a material consideration whether a development makes an appropriate contribution or other provision (or some combination thereof) towards meeting the requirements made necessary by, and relating to, the proposed development'*.

### *Merton Core Strategy*

- The Spatial Vision (Section 7), Criterion (i), includes supporting local community life through... other infrastructure that meets local needs.
- Strategic Objective 3 - provide new homes and infrastructure within Merton's town centres and residential areas. Point d highlights the importance of *'delivering community services and infrastructure to support new homes through development and the effective use of space'*.
- Policies CS 1 – 6 refer to the defined Merton Town Centres and promote community facilities in line with their roles as town centres. This is also reflected in Policy CS 7.
- Policy CS 11 Infrastructure requires new development to provide for any necessary infrastructure. Part g states that Merton will accommodate population growth by: *'Supporting the provision of emergency services as promoted by the Metropolitan Police Asset Management Plan and other emergency service providers'*. This is expanded upon in section 19.23.
- Policy CS 14 Design outlines design considerations for the borough. The supporting text, in section 22.17, promotes the Secured by Design initiative.

### **Comments and proposed changes**

In light of the overarching policy and the MOPC/MPS Estate Strategy, the following representations are made. Parts I, II and III are dealt with in turn.

## Part I – Draft detailed Planning Policies

### **DM R1: Location and scale of development in Merton's town centres**

The MOPC/MPS Estate Strategy identifies the importance of Police Shops in providing an accessible and safe location for the public to interact with police officers. These facilities are best located in areas of high accessibility such as town centres. Adopted Merton Core Strategy Policies CS1- 7 promote community facilities within defined centres. It is therefore essential to ensure the emerging Policy DM R1 reflects this policy, which also complies with the London Plan by assisting in creating a safe and secure borough.

Mindful of the overarching policy requirement, the following change is recommended to section a), parts i and ii. of Policy DM R1 in order to ensure the emerging document complies with relevant policy (additional wording in bold):

- i. *Development that provides a range of unit sizes, including large (floor space generally between 280sq.m and 1000sq.m) and major town centre type uses **including community facilities** (generally over 1000sq.m gross floor space) in...*
- ii. *'Development up to 1,000sqm per unit of floorspace for shops, services, offices ~~and~~ business uses **and community facilities** **which provide an active use** in the designated local centres of...*

The supporting text in section 1.5 should be amended as follows:

*'Merton's town centres and neighbourhood parades provide shops and services that meet different needs of residents. But these town centres and neighbourhood parades also have different characteristics and levels of capacity to grow in the future. The council encourages more retail shops and services, cafes, restaurants, leisure and entertainment facilities, **community facilities** and offices to locate in Merton and will support growth that is appropriate to the centre / neighbourhood parade and the surrounding area'*

### **DM C1: Community facilities**

Policy DM C1 is broadly welcomed however minor alterations are recommended to ensure the policy reflects the London Plan Policy 3.16 and Merton Core Strategy CS11 (f) restricts the **net** loss of community facilities and social infrastructure, while Core Strategy CS11 specifically notes that support will be given to the Metropolitan Police in support of the Estate Strategy. This highlights the possibility of disposal of some older facilities which are no longer suitable for effective policing uses. This may involve the disposal of outdated policing facilities and the re-provision of policing in its constituent parts, namely: police shops, community policing facilities, patrol bases, custody centres and offices. While there are currently no plans to redevelop any properties in Merton, this situation may change in the lifetime of the plan. Redevelopment of these sites will allow the MOPC/MPS to improve the provision of replacement police facilities where these are needed.

Mindful of the 'no net loss' test, there is no policy requirement to re-provide further community facilities or social infrastructure on a specific site. In accordance with the Strategic Development Plan and in order to reflect the

adopted Core Strategy it is therefore recommended that Policy DM C1 is altered in order to facilitate the loss of outdated and life-expired policing facilities while ensuring improved policing and police facilities across the borough. The proposed wording is as follows:

**Planning permission which would result in the loss of community facilities through change of use or redevelopment, will only be granted where:**

- i) Alternative community facilities of a similar nature are provided locally in the area within which that facility serves; or***
- ii) it would enable the implementation of a strategy for the provision of a community service in the Borough; or***
- iii) the site is either demonstrably unsuitable for continued use as a community facility or is vacant and no community use is forthcoming despite active site marketing on realistic terms***

**Provided that:**

- (iv) the alternative or remaining community facilities are easily accessible for those they are intended to serve by foot, cycle, public transport and people with disabilities; and***
- (v) the needs of disadvantaged groups or areas of deprivation have been taken into account.***

The subtext to this policy in Section 3.6 does not take account of the 'net loss' caveat detailed in the London Plan and Core Strategy. It is proposed a caveat is introduced to allow no net loss of community facilities in line with the policy hierarchy. A fifth point should be added, proposed wording is as follows:

- Where no net loss of the community facility occurs, the marketing requirements outlined above will cease to apply.**

#### ***DM E1: Employment areas in Merton***

The MOPC/MPS have identified the potential of relevant employment generating sites in helping them meet the goals of their Estate Strategy in improving the police estate across London. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MOPC/MPS estate strategy and thus effective borough based policing. Furthermore, a number of Metropolitan Police facilities are already located in business parks across the borough (such as Deer Park). 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.

This approach is supported by the London Plan within paragraph 2.84 of policy 2.17 (Strategic Industrial Locations) which states that 'policing and other community safety infrastructure may also be appropriate uses in [Preferred Industrial] Locations'.

Mindful of the above, and in order to comply with the strategic policy in this regard, reference should be made within this section of the emerging document to the provision of employment generating uses, such as policing, as appropriate alternative uses on employment sites. The following amendment to policy DM E1 is recommended:

*Proposals relating to employment sites will only be supported that*

*a) Retain existing employment land and floorspace. The council will support proposals for the redevelopment of vacant and underused existing employment land and floorspace for employment use (B use class **and facilities for emergency services where appropriate**)*

*f) Provide research and development (B1[b] Use Class), light industrial (B1[c] Use Class), light industrial (B2 Use Class), and storage and distribution (B8 Use Class) **and facilities for emergency services where appropriate** in the designated industrial areas; strategic Industrial Locations and Local Industrial Sites*

**DM D1: Design considerations in all developments / DM D4: Urban design and the public realm**

Secured by Design is an important initiative promoted by the Metropolitan Police to ensure a safe and secure environment is created within development proposals. Section 16 of PPS1 states that plan policies should deliver safe, healthy and attractive places to live. It is recommended that Secured by Design Principles are also referred to in Policy DM D1 and DM D4 so the document fully reflects national guidance and advice from the MOPC/MPS and therefore can be considered sound and practical. This would also ensure the emerging document is consistent with the overarching policy.

Therefore additional wording is required in Policy DM D1, section a, sub section (iii) to make reference to Secured by Design:

*'(iii) Provide layouts that are safe secure and take account of crime prevention **and are developed in accordance with Secured by Design Principles**'.*

An additional section should also be added at section (j) of Policy DM D4:

*'(j) **All development should be constructed in accordance with Secured by Design Principles***

**DM F1: Support for flood risk management**

The MOPC/MPS have identified the potential of land within flood risk zone may have in providing land for some of the lower risk, non emergency facilities which the MOPC/MPS provide. We therefore welcome the provision within policy DM F1 and the supporting text and appendix G to support the provision of police facilities which are not required to be operational during flooding within areas of flood risk.

**DM T3: Applying relevant car parking and servicing standards**

Operational vehicle parking for policing plays an important role in the safety and security of the borough. The London plan states in section 6A10 Parking for emergency services facilities: *'provision for parking at ambulance, fire and policing facilities will be assessed on their own merits'*.

In light of the above policy it is clear that an additional specific point should be added to policy DM T3 to reflect the London Plan position above:

***h) provision for parking at ambulance, fire and policing facilities will be assessed on their own merits.***

## **Part II – Potential Sites For New Uses**

The sites outlined in Part II have been assessed and it is noted that a number of them have the potential to facilitate development on a scale which would potentially have an impact on the policing needs of the area. Consequently, it is considered that this policing impact should be mitigated through policy within the emerging document, which would therefore comply with Policy 8.2 of the London Plan. This notes that local priorities (other than those strategically identified) should be addressed. Mindful of London Plan Policy 7.13 to create a safe and secure environment across London, it is considered that any development impact upon policing provision is recognised within this element of the emerging plan.

The sites which are considered to have the potential for development which may impact on the policing needs are outlined below:

- **01 - 'P3' Hartfield Road Car Park**, Car Park Site of No. 66-84, Hartfield Road, Wimbledon SW19 3TB
- **17 - Worsfold House / Chapel Orchard**, Church Road, Mitcham, CR4 3BE
- **19 - Nelson Hospital (including car park)**, 220 Kingston Road, Raynes Park, London SW20 8DB
- **20 - Wilson Hospital**, Cranmer Road, Mitcham, Surrey, CR4 4LD
- **21 - Birches Close**, 1-7 Birches Close, Mitcham, Surrey, CR4 4LQ
- **36 - Chaucer Centre**, Canterbury Road, Morden, Surrey, SM4 6QB
- **37 - Wimbledon Greyhound Stadium**, Plough Lane, Tooting, London, SW17 0BL
- **38 - Thames Water Site**, Byegrove Rad, Colliers Wood, SW19 2AY
- **48 - Land at Bushey Road**, 80-88 Bushey Road, Raynes Park, London, SW20 0JH
- **58 - Sainsbury's (Peel House) Car Park**, Car Park RO 127-149 Kenley Road, Morden, SM4 5BE

It is recommended that the proposed uses section of these sites is amended to include community facilities such as policing. In the cases where this is already the case, the provision of community facilities is supported.

## **Part III – Draft proposals map**

The changes to the proposals map impact upon one MOPC/MPS site in particular: No 22 Tarbor Grove. This site is used by the MOPC/MPS as a training centre and for ancillary offices.. The changes to the defined Wimbledon Town Centre area seek to remove it from the town centre designation. Tarbor Grove is mainly commercial with some residential in nature and comprises a significant amount of commercial and employment generating uses.

PPS 4 Planning for Sustainable Economic Growth deals in Policy EC3 with Planning for Centres. Point F notes that the LPA should: *'at the local level, encourage residential or office development above ground floor retail, leisure or other facilities within centre'*.

It is clear that the uses described in PPS 4 include employment generating uses as appropriate town centre uses. This is reiterated in the glossary of the adopted Core Strategy which lists a wide range of employment generating uses as being suitable town centre uses. Given the nature of this part of the Borough and the current range of uses, it is proposed that the draft town centre boundary is retained as existing.

I trust this is appropriate and the objectives of the MOPC/MPS will be reflected in the forthcoming documents. Please do not hesitate to contact Brian Coughlan or me at this office should you have any queries or require any further information.

Yours faithfully

P.P. BRIAN COUGHLAN

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

Cc. Mayor's Office for Policing and Crime / Metropolitan Police Service