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Strategic Policy and Research
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24 July 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 - STAGE 2A
CONSULTATION DRAFT**

I write on behalf of our client the Mayor's Office for Policing and Crime / Metropolitan Police Service (MOPAC/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 Planning Policy Framework

- Paragraph 70 requires the delivery of social facilities and services to meet the needs of the community.

London Plan Policies

- Paragraph 3.86 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 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.



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- 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 MOPAC/MPS Estate Strategy, the following representations are made in relation to Part II Potential Additional Sites for New Uses.

Part II – Potential Additional Sites For New Uses

The additional 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 or they are sites which may be able to provide policing floorspace.

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 or which may be suitable for policing uses are outlined below:

- **37 – Wimbledon Greyhound Stadium**, Plough Lane, Tooting, London, SW17 0BL
- **71 – Land on Corner of Weir Road and Durnsford Road**, Homebase and Vantage House, 1 Weir Road, Wimbledon, SW19 8UG
- **75 – Former Mitcham Gasworks**, 49 Seagas House, Western Road, Mitcham, CR4 3ED
- **81 – Moat Housing Estate**, Berkshire Way, Brecon Close, Caernarvon Close, Cheshire Close, Glamorgan Close, Huntingdon Close, Kent Close, Lindsey Close, Monmouth Close, Montgomery Close, Radnor Close, Shropshire Close and Southlodge Avenue, Mitcham, CR4

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

Please note that these representations are in addition to those made on 23 March 2012. While the NPPF has been adopted in the meantime, it is considered that these representations are still valid as the change in documentation did not constitute a sea change in the national planning policy position.

I trust this is appropriate and the objectives of the MOPAC/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



John Smith
Senior Associate Director

Cc. Mayor's Office for Policing and Crime / Metropolitan Police Service
Encl. Letter dated 23 March 2012