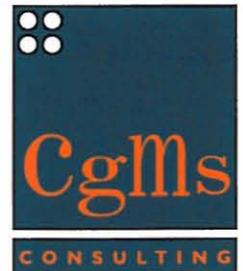


BY POST AND EMAIL: planningpolicy@rbkc.gov.uk

Our Ref: AE/BC/5990

Direct dial: 020 7832 1497
Email: alun.evans@cgms.co.uk

Mr Peter Lerner
Executive Director of Planning and Borough Development
f.a.o. The Planning Team
The Town Hall
Hornton Street
W8 7NX



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

17 December 2009

Dear Mr Learner

**REPRESENTATIONS ON BEHALF OF METROPOLITAN POLICE
AUTHORITY
ROYAL BOROUGH OF KENSINGTON AND CHELSEA CORE
STRATEGY - PROPOSED SUBMISSION**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above draft document. CgMs previously submitted representations to the Core Strategy at several stages, most recently at 'Towards Preferred Options' stage in October 2008, the Strategic Sites in June 2009 and the draft Core Strategy in September 2009 (letters attached).

Context to Representations

The Metropolitan Police Service provide a vital community service to the Royal Borough of Kensington and Chelsea 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 have largely been appropriately addressed by the LPA and this is reflected in the Proposed Submission Core Strategy. The MPA therefore welcome the alterations to the document but some minor changes are proposed in order to ensure that the adopted Core Strategy is 'sound' and accurately reflects the most current MPA estate strategy.

Tests of Soundness

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 Policies CF5 and CK1 of the emerging RBKC Core Strategy comply with the 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 Policies CF5 and CK1.

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.*

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 operational need, below.

Proposed Changes Submission Core Strategy

Policy CF5 Location of Business Uses

The MPA are content in principle with the approach in Policy CF5 Location of Business Uses which promotes the protection of Light Industrial land and Employment Zones in the borough however this is on the basis that policing facilities are considered acceptable on such land. The National and Strategic policy framework supporting this is referred to above.

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. Furthermore, it is considered that a planning policy basis as suggested below to support appropriate policing facilities on designated employment and industrial land in RB Kensington and Chelsea 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 the Strategic Development Plan in this regard the following alterations to Policy CF5 are recommended below.

Recommended Alteration

It is recommended that the following change is made to Policy CF 5 (additional wording in italics) to ensure that surplus employment and industrial land can be used for police uses:

- m. promote employment zones as locations for small businesses, *and for workshops (whether stand alone or part of a large business centre) and for police and emergency service uses where appropriate.*

Policy CK 1 Social and Community Uses

Policy CK 1 is broadly welcomed, however minor alterations are recommended to ensure the policy reflects the Strategic Development Plan. The MPA's estate strategy highlights the possibility of disposal of some older facilities which are no longer suitable for effective policing use. Redevelopment of these sites will allow the MPA to improve the provision of police facilities in the borough. Policy 3A.18 of the London Plan prevents against the **net** loss (my emphasis) of social infrastructure and community facilities. It is therefore recommended that Policy CK1 is altered in order to facilitate the loss of outdated and life-expired policing facilities, ensuring improved policing across the borough and further ensuring that the emerging policy reflects the Strategic Development Plan in this regard.

Recommended Alteration

In order to ensure the emerging policy reflects the Strategic Development Plan it is recommended that the following point is added to policy CK 1, part c: -

- iv. *Permit change of use where the last use was a social or community use where:-*
 - *alternative community facilities of a similar nature are provided locally in the area within which that facility serves;*
 - *it would enable the implementation of a strategy for the provision of a community service in the Borough; or*
 - *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.*

Other Representations

It is recommended that reference to 'Safer Neighbourhood Team Bases' is replaced with '*Neighbourhood Policing Facilities*' in line with current MPA terminology.

The MPA request that the above alteration is taken into account in the final Core Strategy. Should you have any comments or queries please contact either Brian Coughlan or me to discuss them further.



Yours faithfully

A handwritten signature in black ink, appearing to read 'Alun Evans'. The signature is fluid and extends to the right across the page.

Alun Evans
Senior Associate Director

cc: Metropolitan Police Authority

Enc: Representations to Core Strategy 'Towards Preferred Options', letter
08.10.08

Representations to Core Strategy - Strategic Sites, letter 16.06.09

Representations to draft Core Strategy, letter 04.09.09

Metropolitan Police Authority RBKC Asset Management Plan (Nov 07)