



**MATTER 2 - ISSUE 1**

**REPRESENTATION NO.  
45**

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**WRITTEN  
REPRESENTATIONS  
IN RESPECT OF THE  
EMERGING  
DEVELOPMENT (CORE)  
STRATEGY**

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In respect of

**THE LONDON BOROUGH  
OF EALING'S  
DEVELOPMENT  
STRATEGY SUBMISSION  
DOCUMENT**

On behalf of

**METROPOLITAN POLICE  
AUTHORITY/SERVICE  
(REPRESENTOR NO. 11)**

CgMs Ref: SJ/AE/6359

Date: October 2011

**Author:**  
**Sophie Jamieson**

**Approved by:**  
**Kevin Goodwin/Alun Evans**

**Report Status:**  
**FINAL**

**Issue Date:**  
**10/10/2011**

**CgMs Ref:**  
**SJ/AE/6359**

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2010)

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## **1.0 PURPOSE OF STATEMENT**

- 1.1 This statement has been prepared by CgMs on behalf of the Metropolitan Police Authority/Service (MPA/S). The MPA/S wish to make further representations in respect of the Council's Submission Development (Core) Strategy concerning Matter 2 - Issue 1: *'Are the Vision and Strategic Objectives soundly based and appropriate for this Borough, consistent with national policies, reflecting community views and locally distinctive, and do they provide a sound basis for the overall spatial strategy and strategic policies in the Core Strategy?'*
- 1.2 It is considered that part (b) of Policy 1.2 (Delivery of the Vision for Ealing 2026) is unsound because it is not consistent with national policy, nor effective in terms of being flexible to ensure the delivery of infrastructure that would accompany the delivery of any development, as set out in para 4.33 of PPS12.
- 1.3 This statement details the background to the MPA/S' representations to the Development Strategy including an overview of the MPA/S' Estate Strategy. It then demonstrates why part (b) of the Council's draft Policy 1.2 (Delivery of the Vision for Ealing 2026) is unsound and suggests appropriate amendments to ensure soundness.

## **2.0 BACKGROUND TO THE MPA/S' REPRESENTATION**

- 2.1 MPS Property Services Department (PSD) have been actively involved with the GLA, London Boroughs and others in developing a planning strategy to help deliver effective policing for London. Through representations on behalf of the MPA/MPS planning policies across London are now reflecting these positive discussions.
- 2.2 It is however vital that planning policy continues to reflect the need for the MPA/S to deliver a co-ordinated, sustainable and cohesive pan-London estate strategy to facilitate the delivery of effective policing.

### ***The MPA/S' Estate Strategy***

- 2.3 The MPA/S is evolving. It is the single largest employer in London, with over 50,000 staff, and by necessity requires a large property estate across the entire

Greater London area which includes approximately 900 buildings, ranging from offices, police stations, training facilities and specialist facilities, totalling nearly 1,000,000sq.m.

- 2.4 This, together with the ever-changing built and social environment in London, places huge demands on the police estate. In response, MPS PSD is taking forward an unparalleled programme of change, with an emphasis on providing a more effective and locally based service delivery.
- 2.5 The MPA/S have set out a pan-London estate strategy for the period 2010-2014 (Appendix A). Essentially, the aim is to modernise the estate to meet current requirements of the police, staff and Londoners alike.
- 2.6 Currently, police buildings are multi-functional and can include custody, front counters and office accommodation under one roof. This is replicated across each borough. Changes in patterns of crime along with new housing, retail or other developments can mean police stations are not in the most convenient locations for public or police access.
- 2.7 Accommodation is required that enables a more accessible, flexible and effective police service across London. The estate strategy seeks to rationalise operational policing facilities into single or dual role functions providing both public facing and non-public facing facilities. These can be defined as follows:
- Public facing facilities - places where the public can make face-to-face contact with police officers in easily accessible locations by public transport or on foot.
  - Non-public facing facilities - such as police training facilities, forensic research establishments, vehicle maintenance, custody provision, call centres and office buildings for the MPS business support services.

### ***Implications for the London Borough of Ealing***

- 2.8 The London Borough of Ealing is expected to experience significant future growth and change. It is therefore essential that the planning policy framework supports the additional infrastructure need, in line with relevant national guidance and strategic development plan policy, as discussed in the following paragraphs.

### 3.0 MPA/S' PREVIOUS REPRESENTATIONS TO THE DEVELOPMENT STRATEGY

3.1 The MPA/S have sought to ensure a collaborative partnership with each London Borough when submitting representations in order to fulfil the planning policy requirements of their estate strategy and operational needs. This is evident by the number of previously submitted representations on behalf of the MPA/S regarding the Issues and Options for Spatial Planning (31 March 2006), New Issues and Options (17 October 2007), Initial Proposals (16 October 2009) and Final Proposals (30 November 2010) of Ealing's Development Strategy (all attached at Appendix B).

3.2 The Council has accepted neither of the two representations submitted at the previous consultation, as outlined within the table below:

<b>Representations at Proposed Submission stage</b>	<b>Policy</b>	<b>Accepted?</b>
Allow development similar in nature to B Class Uses in Locally Significant Industrial Sites	Part B of Policy 1.2 - Delivery of the Vision for Ealing 2026	No <i>Subject to this EIP Statement</i>
To include reference to Secured by Design principles	6.1 – Physical Infrastructure	No <i>No further action</i>

3.3 The Council's response notes that any plans to re-provide or relocate existing premises will be assessed on the individual merits of that application, having regard to relevant statutory plans, policies and objectives.

3.4 The provision of policing facilities on surplus industrial/employment sites remains an outstanding issue between both parties. The MPA/S therefore hereby submit further written representations for consideration by the Inspector at the forthcoming Examination in Public.

#### **4.0 POLICY 1.2 – DELIVERY OF THE VISION FOR EALING 2026 (PART B)**

- 4.1 The MPA/S sought amendments to part b of emerging Policy 1.2 (Delivery of the Vision for Ealing 2026) in order to enable the potential future provision of appropriate policing facilities in designated employment areas within Ealing. This can be achieved by making specific reference to the provision of social and community infrastructure as an acceptable alternative land uses on employment uses.
- 4.2 The nature of these uses are similar to that carried out on most industrial sites and therefore are ideally suited to such locations, which generally possess easy access to the strategic road network.
- 4.3 Whilst falling outside the 'B' class definition, policing uses are employment generating. Generally the policing uses represent no material external change from an Employment (B1) or Warehousing (B8) use, they possess an employment density similar to or in excess of 'B' class uses and can operate from warehouse type industrial buildings.
- 4.4 Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres.

#### **5.0 SOUNDNESS**

- 5.1 When assessing Policy 1.2 (Delivery of the Vision for Ealing 2026) against PPS12's '*tests of soundness*' it is clear this policy is found to be unsound because it is not effective, defined as deliverable, flexible and able to be monitored (PPS12 paragraph 4.42), nor consistent with national policy (as required by PPS12 paragraph 4.52). The policies which the Development Strategy is not considered to be consistent or in general conformity with are set out below.

##### *Planning Policy Statement 1 – Delivering Sustainable Development*

- 5.2 Paragraph 23 states that planning authorities should '*ensure that infrastructure and services are provided to support new and existing economic development and housing*'. Further, paragraph 27 (iii) (Delivering Sustainable Development),

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*'in preparing development plans, planning authorities should seek to: promote communities which are healthy, safe and crime free...'*

*Planning Policy Statement 4 – Planning for Sustainable Economic Growth*

5.3 Paragraph 4 states that *'economic development includes development within the B Use Classes, public and community uses and main town centre uses. The policies also apply to other development which... provides employment opportunities'*. Policy EC10 requires local planning authorities to *'adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably'*.

5.4 The following are considered material considerations:

*Crime and Disorder Act 1998*

5.5 The Act was introduced to further the government's aim of *'putting crime prevention at the heart of decision making'*. Section 17 (**Appendix C**) imposes a duty on every police authority, local authority and other specified bodies to consider the prevention of crime and disorder in the exercise of all their functions. Specifically it states: *17(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.*

5.6 Planning Inspectorate Note No. 953 (**Appendix D**) states that the subject matter of Section 17 - crime prevention, can be a material consideration for the Inspector in reaching a decision.

*Adopted London Plan (July 2011)*

5.7 The following policies demonstrate the Mayor's support for the police and policing requirements. The emerging Development Strategy is required to reflect this policy framework.

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

5.9 In addition, paragraph 2.84 of Policy 2.17 (Strategic Industrial Locations) states that '*Policing and other community safety infrastructure may also be appropriate uses in [Preferred Industrial] Locations*'.

*London Borough of Ealing's Emerging Development Strategy*

5.10 It is clear that national and strategic guidance acknowledges policing needs as part of the wider social infrastructure requirement. At the local level policing is defined as social infrastructure in the London Borough of Ealing's emerging Development Strategy.

**6.0 EXAMPLES OF POLICING FACILITIES APPROVED IN EMPLOYMENT AREAS AND POLICY REFERENCES IN OTHER LONDON BOROUGHES**

6.1 Similar representations made to other London Boroughs seeking the potential use of surplus employment land for policing facilities have been found sound by Inspectors at other examinations. An example includes adopted Policy DC9 (Strategic Industrial Locations) of the London Borough of Havering's Development Control Policies DPD which states:

*'Police Patrol Bases are considered acceptable uses within Strategic Industrial Locations due to employment density levels and the nature of the use.'*

6.2 Policy DC E 1 (Designated Employment Areas) of the London Borough of Merton's Development Control Policies DPD (Preferred Options) states that '*within the Main Employment Areas, planning permission will only be granted for light and general industry, research and development, warehousing and storage, office development, and activities associated with the Metropolitan Police estate development strategy.*'

6.3 In terms of physical works on employment land we would highlight that London Borough of Haringey have a Patrol Base facility located on employment land at Quicksilver Place. Temporary planning permission was granted in 2006 for a period of three years and renewed in 2009 for a further period to 2012.

- 6.4 Other designated employment land which contain policing uses with similar characteristics to B class uses include a police facility at Deer Park Road, Wimbledon; a Custody Centre at Windmill Road, Croydon; and a Patrol Base at Great Cambridge Road Primary Industrial Estate, Enfield.
- 6.5 Planning permission was also approved by the London Borough of Hammersmith and Fulham in November 2010 for a specialised police operations base on employment land at Lillie Road. The facility provides office accommodation, storage, training rooms, writing rooms, meeting and briefing facilities, locker and shower rooms and parking for operational vehicles.
- 6.6 The above examples have all been successfully implemented on existing employment sites.

## 7.0 CONCLUSIONS

7.1 The MPA/S consider that part (b) of Policy 1.2 (Delivery of the Vision for Ealing 2026) of the Development Strategy is unsound as i) it is not consistent with national policy, specifically PPS1 and PPS4; ii) it is not effective in terms of being flexible to ensure the delivery of infrastructure that would accompany the delivery of any development, as set out in para 4.33 of PPS12; and iii) does not make suitable provision for employment in the interest of the local economy and that of London as a whole.

7.2 The Development Strategy can be made sound through recognition that policing facilities that do not require public access can be appropriately located on surplus employment/industrial land, ensuring consistency with national and regional policy. This would be achieved through an amendment to part b of Policy 1.2 as set out below (additional wording underlined):

*Managed release of employment sites will involve categorising employment sites into three broad categories: -*

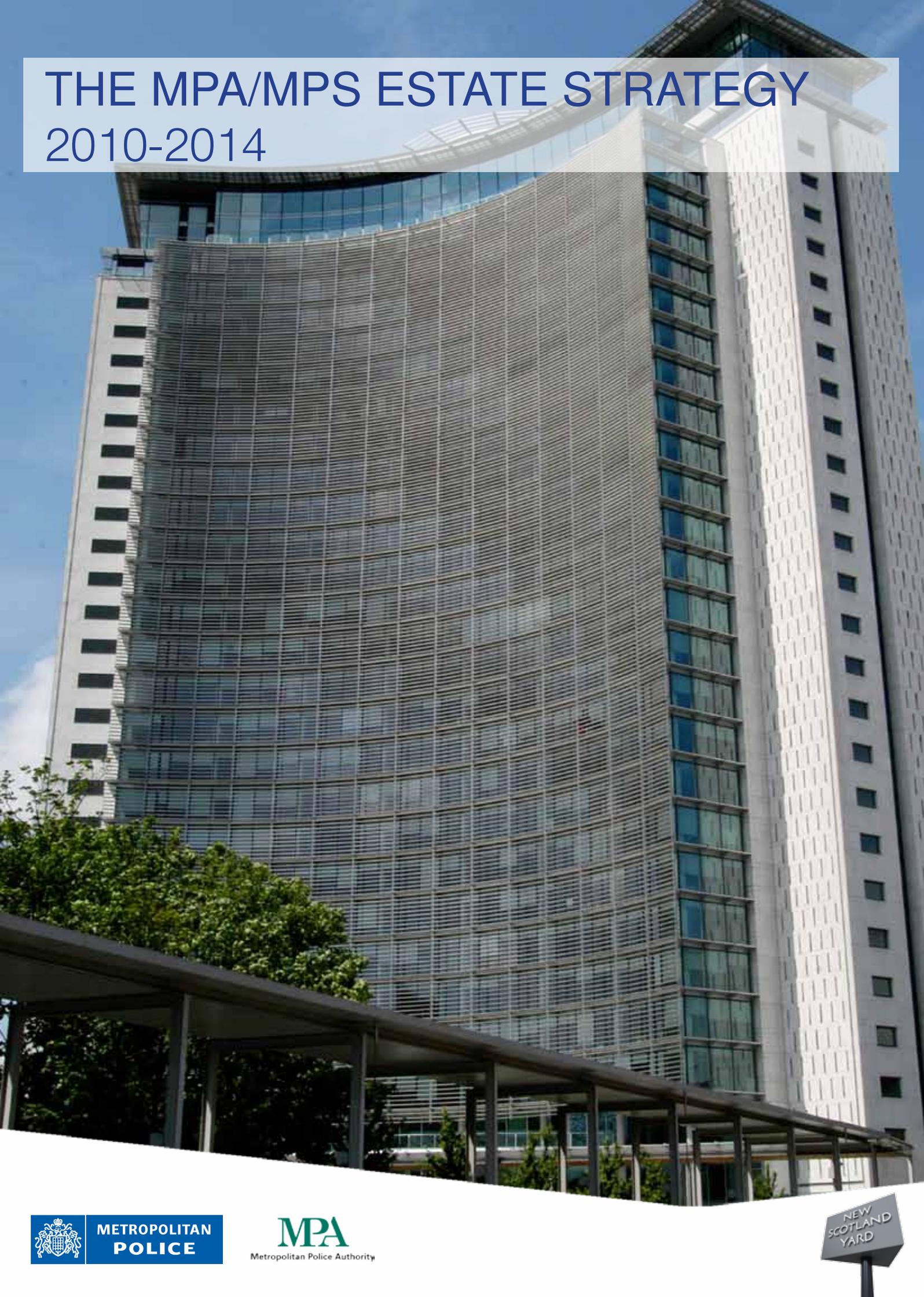
- *Long-term protection – Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) comprise the borough’s strategic employment land and are the primary focus for general industrial and warehousing land. Where appropriate these sites may also accommodate office development and alternative employment-generating uses, including community infrastructure, where appropriate.*
- *Medium-term release - ... [As proposed text]*

7.3 For the above reasons it is demonstrated that the suggested amendment to part b of Policy 1.2 (Delivery of the Vision for Ealing 2026) of Ealing's Development Strategy be made in order to ensure that the policy is compatible with the adopted development plan and to ensure that effective policing can be maintained.

## **Appendix A**

### **The MPA/MPS Estate Strategy 2010 - 2014**

# THE MPA/MPS ESTATE STRATEGY 2010-2014



**METROPOLITAN  
POLICE**

**MPA**

Metropolitan Police Authority

NEW  
SCOTLAND  
YARD

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# Foreword: Kit Malthouse

The Metropolitan Police Authority (MPA) is responsible for the Metropolitan Police estate and we recognise the vital role our buildings play in supporting the delivery of effective and efficient policing for communities across the capital. We are committed to providing Londoners with a customer focussed, effective, value for money service that is constantly responsive to the needs of the communities we serve. This means we need to modernise and adapt our buildings to accommodate up-to-date policing practices and functions.

The MPA owns a lot of property. In our view too much, especially since a lot of it is old and outdated, is very expensive to maintain and much is not used particularly efficiently. We need to sell some of it and modernise the rest. We also need to make sure our buildings are in the right place.

But buildings often represent something important, especially the local nick. The police station has become a powerful symbol of police presence and a threat of closure can often spark outrage and strong views. We are sensitive to this. In fact, we want a greater police presence and to make access to services easier. More cops on the street and front counters in better places such as supermarkets and libraries for example, will actually make contact with the police easier. We can then move all the other functions behind the front counter into efficient, cheaper buildings so we can spend even more money on blue uniforms to patrol your street.



The previous estates plan caused alarm bells to ring across the capital. So we tore that up and started again. This one has had a lot more work and thinking by a team from the MPA and MPS who we thank for their diligence. I hope it makes sense to you and that from it you can see that our aim is to drastically improve the service we offer London and release money for fighting crime.

Kit Malthouse  
**Chair of the MPA**

# Foreword: Anne McMeel

The Metropolitan Police Service faces many changes over the next few years – responding to a growing and diverse population, collaborating with new partners and working within increasingly difficult financial constraints. These challenges will impact on the whole service, including how we use the buildings and facilities from which we all work.

In doing this we can also have the flexibility we need to continue to be in the right place, at the right time, responding from the right locations to the needs of Londoners 365 days a year.

We have come a long way and made real progress – developing new facilities, working with partner organisations and providing more accessible policing, whilst at the same time improving existing buildings, and disposing of selected buildings which are no longer needed for policing in London today.



Times have changed, there is more pressure on resources and we need to make the estate work harder for us. This is not just about delivering savings but providing property services to policing colleagues and doing all we can to maintain our operational capability on front line policing. By making our estate work harder we can make it work more efficiently and effectively for the staff and officers who use it every day. We need to work smarter, making the estate a more dynamic asset that responds to operational need whilst delivering value for money for Londoners.

But there is also some way to go if we are to deliver our vision of an efficient, flexible and value for money estate. We will continue to respond professionally to deliver the policy needs of the Service at every level – from training and patrolling, to Safer Neighbourhoods bases and custody provision. Our buildings represent a real policing presence in our communities. This Estate Strategy sets out our vision for the estate in supporting the delivery of an effective policing service to London in a way that increases public confidence and safety.

Anne McMeel  
**Director of Resources**

In following the Corporate Real Estate model we are working in the same way as many other large property occupiers, ensuring that Metropolitan Police Service Property Services is, in the short term, looking at solutions and opportunities whilst working to a longer term vision to deliver the right property solution to meet operational needs.

# 1. Context: challenges facing the Metropolitan Police Service

The Metropolitan Police Service (MPS) serves a population of over 7.5 million living in an area of 1,579 sq kms. The population is expected to rise to 8.1 million by 2016 and as well as residents, London has a significant number of commuters and visitors who impact on the dynamics of the city.

Policing in London is a 24 hour/7 days a week operation delivered by over 50,000 people.

Each year the MPS deals with 7 million telephone calls and recorded crimes are in the order of 830,000 a year.

The MPS aims to build public safety and confidence by:

- Convincing communities we are on their side.
- Reducing crime and catching criminals.
- Being intolerant of violence.
- Delivering security on the streets of London.
- Delivering the right services at the right price.

The MPS's mission is "to make London the safest major city in the world". What needs to be done and how the MPS works as an organisation to deliver that mission over the medium term can be summarised as follows:

To deliver SAFETY and CONFIDENCE

Our PRESENCE must be felt across London  
Our PERFORMANCE must be outstanding  
Our PRODUCTIVITY must be high, and  
Our PROFESSIONALISM must be a cause for PRIDE

The MPS vision is supported by the corporate themes of safety, confidence and improvement.



Bromley Police Station - a modern multi-purpose building



New Scotland Yard

## Safety

In promoting safety for those who live, work and visit London, the MPS is committed to reducing crime and catching criminals, being intolerant of violence and delivering security on the streets of London.

## Confidence

The MPS, in all that it does, is working to convince communities in London that it is on their side and to improve people's experience of its services.

## Improvement

The MPS aims to provide the right services at the right price thus ensuring the efficient, effective and economic use of all the resources entrusted to it.

More details about these themes can be found on the MPA and MPS websites, notably in the MPA/MPS Policing Plan and the MPA Met Forward documents.

[www.mpa.gov.uk](http://www.mpa.gov.uk)

[www.met.police.uk](http://www.met.police.uk)

## 2. How do we police London?

London is a vibrant international city, home to 7.6 million people and many languages. Millions more work in, and visit, the city each year. It is a multi-layered world, shifting shape and size constantly.

The MPS protects London 24 hours a day. It is as dynamic as the city and is geared to respond to the public's calls for help, and to threats to public safety, from wherever they emerge.

The MPS makes its presence felt when and where it matters. Its workforce of more than 32,000 police officers, over 4,000 Police Community Support Officers (PCSOs) and over 14,000 support staff work across a number of inter-linked levels.

The MPS's interaction with the public takes place in a number of different ways:

- Command Control Call Centres take telephone calls and may be the first point of contact for some people.
- Front counters offer face to face contact for those reporting crime or collecting and returning forms.
- Safer Neighbourhoods bases serve local wards.
- Kiosk/information points with touch screens linked to the local team can be found in shopping centre locations.
- Mobile police stations serve local communities as required.
- The MPS is also contactable by email and emergency and non emergency telephone numbers.

- In wards and neighbourhoods, the MPS is present in local policing teams. London has 625 electoral wards, each with around 20,000 households. Every ward has a local team which enhances police presence in local communities.
- In the 32 geographical borough commands, which match local authority boundaries, the MPS organises its 999 response teams and runs local Criminal Investigation Department (CID) teams. Borough Commanders are the link with councils and other agencies.
- On a pan-London level, the MPS runs murder squads, public order units, firearms teams, forensics support and other highly trained specialist units required to police a modern major city, such as squads to target drug traffickers.
- London has one of the world's busiest transport networks. The MPS operates a pan-London Safer Transport Command, which works closely with British Transport Police and Transport for London, and road policing.
- At a national and international level, the MPS leads the British policing response to terrorism and protects politicians, the royal family and visiting heads of state. It is an important player in the fight against international organised crime.
- In the sphere of terrorism, the work by police and other agencies at grass-roots level, with young people in schools and youth clubs in London, may be the key to disrupting the plans of terrorist groups based thousands of miles away. Counter-terrorist investigators find their inquiries stretching from a London neighbourhood to the international arena.
- The work at all these levels, from Scotland Yard specialist units to PCSOs, is part of an integrated approach, because the criminals and those who threaten the safety of the population recognise no levels or boundaries.
- Much of what the MPS does is visible and overt. Its uniformed response teams turn up to 999 calls from the public. In neighbourhoods and town centres across London, the MPS provides a visible, uniformed and reassuring police presence.



A Met Police vehicle patrolling London

- The MPS is on display to the world as its uniformed officers police more than 4,500 public order events each year, ranging from the Notting Hill Carnival, through to football matches and the planned policing of the 2012 London Olympic and Paralympic Games.
- However, much of its most important protective work is 'invisible'. The public may benefit from a safer London but will not see the work of counter-terrorist detectives, child protection teams, e-crime specialists, surveillance units and other specialist squads, or the work MPS officers and staff carry out to ensure offenders are put into the criminal justice system.
- Some of the property the MPS uses is publicly identifiable and visible. Many response officers and some neighbourhood teams are based in 'traditional', multi-functional police stations, alongside custody suites and CID units.
- However, in recent years, neighbourhood teams have been based in non-police premises, including council offices. The key is to be based in or very close to their wards.
- Increasingly, as older buildings are replaced, the emphasis is on ensuring police officers are based in locations which allow them to get to the public, in need and distress, as quickly as possible. This may mean building separate custody bases and putting response or local policing teams in premises at the heart of the areas they police.
- Police officers and staff do not wait in stations for calls to respond to. They are out, on the streets and in communities, patrolling. Increasingly, with police officers patrolling on their own, the 'footprint' they cover in London is bigger.
- What matters is not the buildings the officers gather in for their shifts or their locations, but that they are well-briefed and that they know their areas. What matters is that they have the right equipment to get to the public, when they are needed, as quickly as possible.
- Equally, some of the MPS's most vital units, such as surveillance teams working against armed gangsters, are in anonymous buildings.
- Working at a computer, in an office, to identify those cyber-trafficking child abuse images may lead to the rescue of children in London from abuse. Invisible, covert policing plays a major role in keeping London safe.
- Increasingly, the handling of detainees in custody is moving from the older, traditional stations to purpose built custody centres. This will make little difference to the public whose main concern is that offenders are arrested.
- The key to all of the MPS's plans is that it can get to people who need its help quickly, where and when it counts, and that people are able to call on it for help - by phone, SMS, email, across the internet or in person.





### 3. Context: challenges facing the Metropolitan Police estate

Overall responsibility for the estate is vested in the Metropolitan Police Authority (MPA), the statutory organisation responsible for ensuring an efficient and effective police service for London. Day-to-day management of the estate is delegated by the MPA to the MPS which occupies the estate. The Property Services Department, within the Resources Directorate, has delegated responsibility for the management of the estate.

The estate currently comprises just under 1,000,000 sq m and in the order of 900 buildings. It can be categorised in various ways but from a public perspective the most important differentiation is between public facing and non-public facing functions.

**Public facing facilities** include places where the public can make face to face contact with police officers whether they are victims or witnesses of crime, offenders, or using the police services in another way.

**Non-public facing facilities** include police training facilities, forensic research establishments, call centres and office buildings for the MPS business support services (finance, human resources, etc).

The MPS also has residential facilities including blocks of flats, individual houses and single flats, or hostel style 'section house' accommodation allocated under specific criteria to staff and officers.

The key challenges facing the estate are:

- Responding to the speed of change and the increasingly dynamic nature of policing.
- Having the right buildings, of the right size, in the right place.
- Being able to accommodate new policing operations at short notice.
- Accommodating new functions into existing buildings without disrupting current operations.
- Working with a range of other public sector partners.
- Working within increasingly difficult financial constraints and ensuring the MPS is making the best use of its assets.

## 4. Meeting the challenge

Along with people, information technology and vehicles, property is one of the key resources which supports operational policing. To ensure efficiencies in the use of property, the MPA and the MPS regularly review their Estate Strategy and supporting plans for implementing it.

In the last few years the MPS has concentrated on the provision of Safer Neighbourhoods bases, new custody facilities and new patrol bases across the capital. Whilst the estate has expanded in terms of numbers of buildings, selected properties have been sold where they are no longer needed for operational delivery.



Enfield Patrol Base

The MPA and the MPS now need to rationalise the estate to ensure it meets service needs in the most cost effective manner. The MPS will work to agreed space standards and co-locate functions in order to operate from fewer properties, but will ensure that it maintains operational policing capability.

The current Estate Strategy comprises three core elements:

- The Property vision.
- Property objectives.
- Key themes for change and targets.

In addition, the MPS has a range of implementation plans.

## 5. The property vision

### VISION

Continually improving the use of the estate.

We will optimise the use of the estate to achieve MPA/MPS objectives through prioritised spending and ensuring value for money. We will achieve this using a framework that supports inclusion and recognises the diversity of the communities we service.

The Property Services team supports the MPA and MPS in the strategic planning, delivery, management and operation of the estate. The Property vision is in line with other public bodies with an operational or service focus, where property is a supporting function. The planning, delivery, operation and review of property must flow from the operational need. However, this does not stop the MPS from challenging and reviewing the operational need to ensure value for money from its resources. The aim is to provide a well planned property portfolio which:

- Meets current and future service needs in terms of confidence, safety and value for money.
- Is in good condition with minimal maintenance backlog.
- Rationalises property wherever possible in line with future needs (e.g. crime, risks, changing population, growth areas, changing patterns of service delivery, work style of the MPS staff).
- Provides working conditions that support good service performance.
- Capitalises upon co-location opportunities within London and exploits the synergies of partnerships.
- Releases capital for reinvestment where appropriate.
- Is regularly reviewed using agreed criteria.
- Allocates investment in future property according to a robust corporate prioritisation framework.
- Continues to drive energy efficiency and uphold high environmental standards.

# 6. Property objectives

The property objectives are aligned with the MPS objectives of safety, confidence and value for money. The following high level property objectives have been developed:

## Safety

- Provide safe and secure facilities throughout the estate for those using or visiting the MPA/ MPS properties.
- Provide accommodation that meets statutory and regulatory requirements in terms of health and safety and accessibility.
- Provide accommodation in appropriate locations supporting operational imperatives.

## Confidence

- Provide accommodation in support of the Safer Neighbourhoods programme and separately the provision of front counter facilities.
- Provide good quality accommodation for service needs in appropriate locations.

## Value for Money

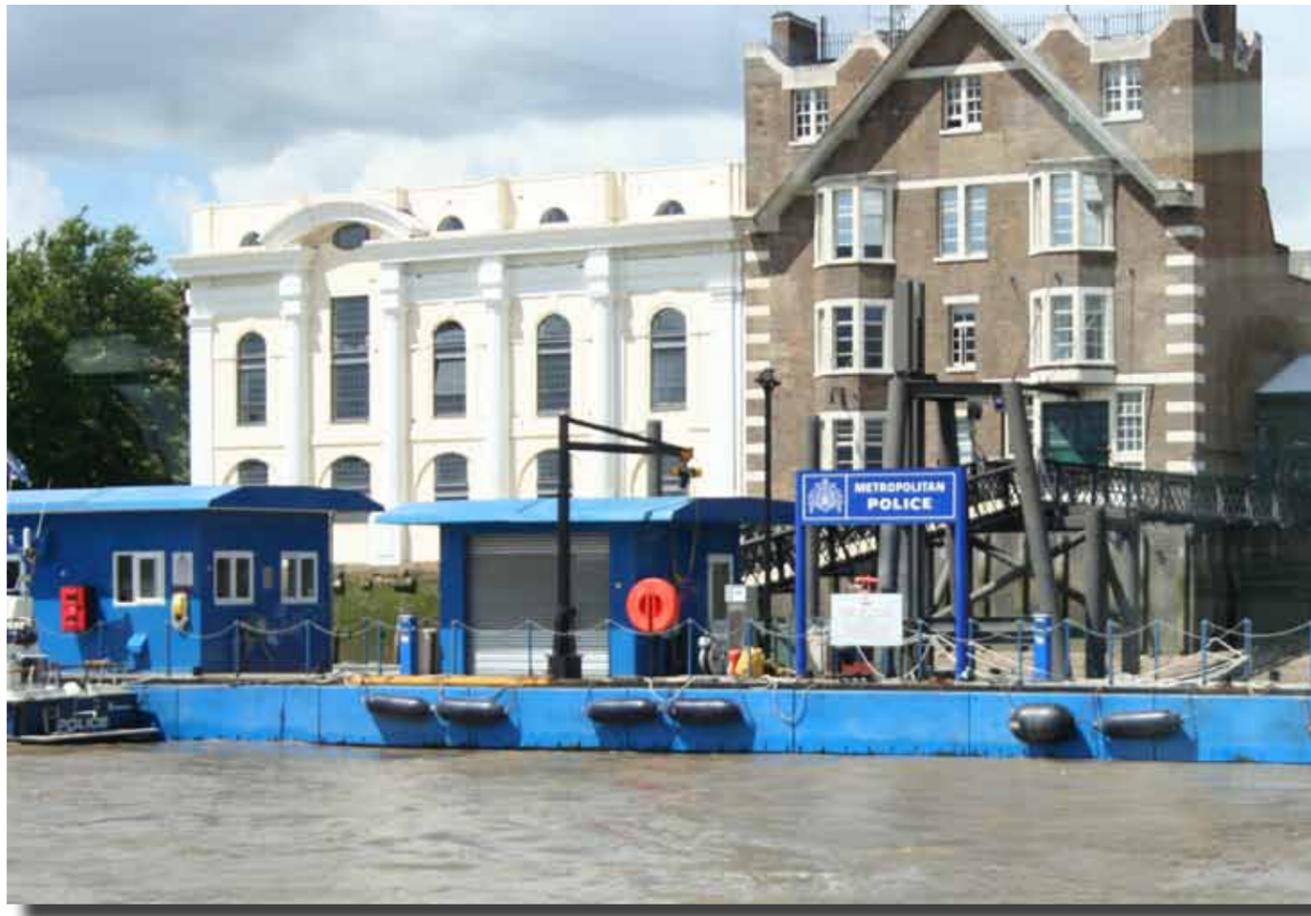
- Ensure maximum use of real estate assets whilst minimising operational cost.
- Offer an efficient working environment for staff supporting high performance.
- Co-locate services to capitalise on the opportunities of partnership working.
- Promote sustainable and environmentally friendly provision and use of property.



# 7. Framework for estate change

The framework for change consists of:

- Real estate - the physical estate and buildings.
- Process - the process change required to support an effective and efficient estate.
- Service - how Property Services, together with colleagues from across the MPS, respond to the estate challenges.



Wapping Pontoon and Police Station houses the Metropolitan Police river fleet

# 7.1 Real estate: fit for purpose estate

## Condition

The current operational estate is highly diversified and has a significant backlog of maintenance issues. The ongoing programme of condition surveys will ensure that the MPS updates the backlog costs and provide a revised programme of repairs, redevelopments and building disposals.

## Sufficiency

The MPS has an ongoing programme to gauge the size of the estate relative to the operational needs. It has also developed policies that allow it to provide suitable front counter facilities or reception areas and Safer Neighbourhoods bases for the communities it serves.

## Capital programme

There is an ongoing programme of new building development to replace the older and unsuitable buildings in the estate. A matrix, which prioritises new capital projects against the Policing London Business Plan's priorities, has been developed.

## Suitability

In a number of cases, buildings are not being used for the original purpose they were designed for. The MPS is therefore pursuing a programme, as new buildings come on stream, to move business units to more fit for purpose premises.

A planned exit strategy has already been developed in regard to the residential estate, where it is anticipated that core property holdings will be a maximum of 200 units.

Property Services are developing work programmes to optimise the utilisation and re-profiling of the estate. Part of this programme is the development of appropriate standards and protocols for the use of property.

To deliver a leaner, more effective estate, business processes and operational demand are being analysed within properties primarily used for office, storage and training purposes. The overarching aim is to meet operational need while reducing cost and generating capital receipts which can be invested in operational policing and public facing buildings.

# 7.2 Process

## Corporate Real Estate approach

The MPS has moved to a more corporate approach to the planning, delivery, operation and use of property. Property Services are the professional lead for real estate and will advise MPS Management Board so that property related decisions can be taken in the overall corporate interest of the service. All business groups have been consulted and are supportive of this strategy which will help to bring about more effective use of property.

Property Services are also putting the Corporate Real Estate approach at the heart of the delivery of property services within the organisation.

## Collaboration

In financially challenging times it is even more important that the MPS works closely with other public agencies and private sector partners and, where practical, looks to share services with partners.

Its key regional public partners are the other members of the Greater London Authority - Transport for London in particular.

At a local level the MPS interfaces with the borough councils and the Primary Care Trusts through the Local Strategic Partnerships (LSP).

Through the Safer Neighbourhoods programme the MPS has located a number of units within assets owned by other public partners, e.g. local authorities. The MPS is keen to continue this initiative so it is currently working with a number of London councils to develop joint solutions to some of its property challenges.



Safer Neighbourhoods Base - Bromley

## Criteria for retention, rationalisation and acquisition of property

To achieve value for money in its estate and reach optimal cost levels, the MPS needs to be thorough in challenging its need for property and its intensity of use.

The MPS recognises that it will need to provide for the property and accommodation needs of existing, new and improved public services and the needs of its workforce. At the same time it needs to release significant capital from, and reduce the revenue costs of, the estate. This will be done through regular service property reviews and area property reviews. The MPS has a decision matrix to determine whether to hold or dispose of properties and this is continually reviewed against the changing operational policing priorities. Whilst the criteria are continually reviewed, particularly operational related matters, the issues under consideration include, but are not limited to:

- Impact on operational capability (e.g. single site patrolling, custody provision, front counter provision).
- Annual revenue costs.
- Projected capital investment.
- Public footfall (where appropriate).
- Carbon footprint / energy performance/ Display Energy Certificate (DEC) rating.
- Utilisation of facilities / workspace.
- Options for lease termination.
- Availability of alternative building solution.
- Presence of Information, Communications and Technology (ICT) notes.
- Current building condition.
- Building and location suitability.

The MPS also has priority lists for new capital projects which are reviewed against agreed criteria. This results in a comprehensive investment plan for property.

## Corporate Social Responsibility (CSR)

As with town planning, the MPA and the MPS are developing a separate CSR strategy. The MPA and the MPS have a very strong commitment to the principles of social, economic and environmental sustainability. These are corporate responsibilities which business units uphold and the Resources Directorate, including Property Services, drive through the estates vision, strategy and plans.

In the long term re-profiling of the estate, the following are being taken into account:

- Energy costs of buildings.
- Responsibilities towards Carbon Reduction Commitment (CRC).
- Travel patterns of the public as well as employees .
- Environmental targets set by central government as well as the Greater London Authority (GLA).

## 7.3 Service

### Olympics and the Thames Gateway

The London 2012 Olympic and Paralympic Games and the Thames Gateway are two significant programmes of work. The MPS has an Olympic Programme team as well as a Thames Gateway Programme Board. The MPS is closely monitoring any new processes and operational plans being adopted in these two programmes and feeds any improved processes, systems and ideas into its future plans.

### Multiple clients, single source of advice

Property Services' current structure provides for a dedicated single point of contact for each MPS business group. Through these individuals, the MPS coordinates the collective operational demands of the service so it can plan the estate on a corporate basis. This way it can bring about synergies across the various MPS business groups.

### Value for money

The MPS is very focussed on achieving year on year value for money improvements in the estate. Driven by the need to make better use of the estate, it should be able to reduce its size which in turn will drive down running costs and release surplus assets for disposal.

The MPS strives to develop as well as follow best practice in everything it does. It participates in a number of property industry groups, as well as police specific groups, which share and disseminate these skills and information. It has also shared with the Home Office some of its evolving design standards and, through its relationship with Transport for London, shares information and good practice.

### Town planning

The MPS has a separate town planning strategy - *Planning for Future Police Estate Development*.

Town planning is an important tool for the MPS to use in a proactive as well as a reactive way. The MPS articulates to regional and local government the policing demands in terms of property. It also responds to requests from local authorities on large scale development opportunities where the development justifies a dedicated police facility or contribution to the local policing function. The MPS therefore influences the Mayor's London Plan as well as individual borough's Local Development Frameworks (LDF).

Under the Secure by Design initiative the MPS has a number of Crime Prevention Design Advisors, who provide input at a design stage into large scale regeneration projects.

The MPS will continue to input into the emerging Community Infrastructure Levy (CiL).



A new Custody Centre - Waltham Forest

# 8. Performance measurement and improvement

To support the objectives and key themes the MPS has a range of implementation plans. The MPS will:

- Set targets and the owners allocated will monitor progress on these commitments. These will be reported through our performance monitoring framework.
- Have a strong commitment to improving data collection, systems and management. It is reviewing its internal data management systems and will determine future need against this strategy.
- Continue to conduct post occupancy evaluation of all programmes and projects to ensure benefits are being realised and lessons are fed back into new programmes.

In addition to these internal measures, the MPS takes part in a number of voluntary and mandatory benchmarking exercises. Through the Police Property Managers Group and its internal systems, the MPS will continue to monitor the performance of the estate.



## Glossary

CiL	Community Infrastructure Levy
CRC	Carbon Reduction Commitment
CSR	Corporate Social Responsibility
DoR	Directorate of Resources
FM	Facilities Management
GLA	Greater London Authority
HMIC	Her Majesty's Inspectorate of Constabulary
HR	Human Resources
ICT	Information Communications Technology
KPI	Key Performance Indicator
LSP	Local Strategic Partnership
MPA	Metropolitan Police Authority
MPS	Metropolitan Police Service
PSD	Property Services Department
SIP	Service Improvement Programme
TfL	Transport for London

## Contact

Director of Property Services  
 Metropolitan Police Service Property Services  
 12th Floor, Empress State Building  
 Empress Approach  
 Lillie Road, Earls Court  
 London  
 SW6 1TR

## **Appendix B**

**Letters of Representation to Issues and Options for Spatial Planning (31 March 2006), New Issues and Options (17 October 2007), Initial Proposals (16 October 2009) and Final Proposals (30 November 2010)**

**BY EMAIL AND POST: panpol@ealing.gov.uk**

Our Ref: MR/6359  
Direct dial: 020 7832 1475  
Email: [matthew.roe@cgms.co.uk](mailto:matthew.roe@cgms.co.uk)

Planning Policy Team  
Environment Group  
London Borough of Ealing  
Percival House  
14/16 Uxbridge Road  
London  
W5 2HL

31<sup>st</sup> March 2006

Dear Sir

**ISSUES AND OPTIONS PAPER FOR SPATIAL PLANNING  
REPRESENTATION ON BEHALF OF METROPOLITAN POLICE  
AUTHORITY**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above draft document. CgMs and representatives of the Property Services Department are seeking a meeting with the Council in the near future to discuss the spatial planning implications of: i) the MPA's recent changes to their estate and ii) the proposed future growth in Ealing.

Having regard to the Issues and Options Paper, the MPA have a number of brief comments at this stage.

**Urban Design**

The MPA are mindful that Central Government policy in Planning Policy Statement 1 states development plan policies should seek the creation of safe and accessible environments where crime and fear of crime does not undermine the quality of life or community cohesion. PPS1 also advocates adoption of the principles of the ODPM publication '*Safer Places*'. Within this context, the MPA request that the Council's policies recognise the need for the design of all development to reduce crime and the fear of crime, and encourage developers to incorporate Secured by Design principles from the conception of development schemes.

**Housing**

Significant levels of new development are proposed in Ealing over the next ten years. The Mayor's draft Proposed Alterations to the London Plan specifies an annual target of 845 dwellings over this period. This scale of development will increase demands on police resources in seeking to deliver safe communities. Policing needs should therefore be a consideration in the determination of major development schemes and the Council's policies should reflect this need.

The MPA have a shortage of suitable, available residential accommodation for young police officers. The MPA are therefore keen for the quantum of intermediate housing suitable for key workers, and therefore police officers, to be maximised by the Council's LDF policies consistent with national and London Plan guidance.

### **Business**

As a result of review of MPA's estate strategy there is a potential need for the development of a patrol base and custody centre within Ealing. Both facilities operate 24/7 and require good accessibility to the local road network. In other London Boroughs patrol bases have been introduced in employment areas and such locations are being explored for custody centres. The Council's policies for allocating employment land for future development should take into account these potential needs.

### **Shopping and Town Centres**

A key part of the MPA's estate review is to introduce police '*shops*' into locations with good accessibility. The purpose of the police '*shops*' are to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. Therefore, the Council's policies should allow the introduction of police '*shops*' in the main shopping frontages of the town centres.

The MPA propose to introduce Safer Neighbourhood Teams into every Ward across the Borough. These Teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police '*shops*'. The MPA request the Council's policy recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.

I trust these comments will be taken into consideration in developing the Council's LDF and look forward to receiving details of the consultation on future documents. If, in the interim, you have any queries please do not hesitate to contact me.

Yours faithfully

**Matthew Roe**  
**Senior Associate Director**

c.c. Metropolitan Police Authority

**BY POST AND EMAIL: [brian.capon@ealing.gov.uk](mailto:brian.capon@ealing.gov.uk)**

Our Ref: MR/SC/6359

Direct dial: 020 7832 1475  
email address: [matthew.roe@cgms.co.uk](mailto:matthew.roe@cgms.co.uk)

Mr Brian Capon  
London Borough of Ealing  
Planning Policy and Development Advice  
Perceval House  
14-16 Uxbridge Road  
London  
W5 2HL

19 October 2007

Dear Mr Capon

**REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY (MPA) TO EALING'S NEW ISSUES AND OPTIONS**

I write on behalf of our client, the Metropolitan Police Authority (MPA), with regard to the Council's consultation on the New Issues and Options for the Core Strategy and Site Specific Allocations DPDs of the Local Development Framework (LDF).

CgMs have previously submitted representations on behalf of the MPA at the original Issues and Options stage of the Spatial Planning paper by way of letter dated 31 March 2006, in which we set out the background to the MPA's representations and made a number of comments in regards to Urban Design, Housing, Employment Areas and Town Centres.

The Council have now published their New Issues and Options paper following the introduction of a new political administration in Ealing Town Hall in May 2006 and the MPA are pleased to note that Community Safety has been included as one of the ten borough-wide objectives.

***Core Strategy***

Chapter 4 considers the issues and options on how to achieve each of the the borough-wide objectives. For each issue three alternative options have been provided, we have therefore highlighted the most appropriate in each case to meet the MPA estate needs.

***Objective 4 'Ensuring sufficient, high quality accommodation for all Ealing's residents'***

Issue 4.1 asks 'How can we improve housing in Ealing?' The MPA support option **4.1(b)** which seeks to promote comprehensive regeneration of the Council's social housing stock, and encourage higher density and mixed use development.

Issue 4.2 asks 'How can we maintain an adequate supply of housing in the borough?' The MPA support option **4.2(b)** which seeks to identify additional housing sites and plan for delivery over five year periods.



Morley House  
26 Holborn Viaduct  
London  
EC1A 2AT

Tel: 020 7583 6767  
Fax: 020 7583 2231

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N. Doggett BA, PhD, CertArchaeol, MIFA, IHBC  
J. Edis MA, PhD, MIFA, IHBC  
J. Forbes Marsden BA, MA, CertArch, MIFA  
D. Hawkins BA, MIFA  
C. Hicks BSc (Econ), MCD, MEI, MRTPI  
M. Honour BLE, MRICS, MRTPI  
A. Hubbard BA (Hons), DipUP, MPhil, MRTPI  
D. Keyte BA, MRTPI  
J. Lowe BA, Arch  
G. Pugh BA, MIFA  
M. Roe BA, MTP, MRTPI  
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N. Lawrence MTPC (Hons), MRTPI  
N. McLoughlin BSc, DipTP, MRTPI  
R. Meager BA, MA, AIFA  
D. Pickard  
W. Thompson BA, Dip TP, MRTPI  
S. Watt BA, PGDipArchaeol, DipEnvPol(Open), AIFA  
Consultants  
N. Balaam MSc, MIFA, FSA  
A. Bowhill MA, LL.M, LL.B, BSc, FRICS, FRTP  
P. Copeland BA, BSc, MRICS  
P. Shelley FRICS, FRTP  
J. Thompson MA, MBA, DipM

CgMs Limited  
Registered in England:  
No 3303376  
Registered Offices:  
5-11 Mortimer Street, London  
W1T 3HS



Issue 4.3 asks 'How can we maximise affordable housing?' The MPA have a shortage of suitable, available residential accommodation for young police officers. The MPA are therefore keen for the quantum of intermediate housing suitable for key workers, and therefore police officers, to be maximised by the Council's LDF policies consistent with national and London Plan guidance. The MPA support option **4.3(c)** which seeks to encourage 50% affordable housing on all sites capable of accommodating 10 units or more.

Issue 4.4 asks 'How can we achieve the range of house sizes and types to meet Ealing's housing needs?' Significant levels of new development are proposed in Ealing over the next ten years. The Draft Mayor's Housing Strategy (September 2007) indicates that the London Plan annual housing target for Ealing is 915 dwellings over the Plan period. This scale of development will increase demands on police resources in seeking to deliver safe communities. Policing needs should therefore be a consideration in the determination of major development schemes and Council's policies should reflect this need. The MPA therefore support option **4.4(a)** which seeks to regulate planning applications so that residential development reflects local housing need and contributes to the achievement of balanced residential communities.

***Objective 7 'Designing out crime and making Ealing's environment safe, attractive and accessible for all'***

Issue 7.1 asks 'How best to design for protecting the public?' The MPA are mindful that Planning Policy Statement 1 (PPS1) states that development plan policies should seek the creation of safe and accessible environments where crime and fear of crime does not undermine the quality of life or community cohesion. PPS1 advocates adoption of the principles of the ODPM publication 'Safer Places'. Within this context, the MPA request that the Council's policies recognise the need for the design of all development to reduce crime and the fear of crime, and encourage developers to incorporate Secured by Design principles from the conception of development schemes. The MPA support option **7.1(a)** which seeks to only permit new development where the layout and design is based on the promotion of a safe and secure environment, including the maximum possible adoption of natural surveillance of public space. The MPA believe it is pertinent to incorporate reference to the objections and principles of both 'Safer Places' and Police 'Secured by Design' concepts in the Preferred Options policies for the design of development.

Issue 7.2 asks 'What sort of crime prevention proposals should we introduce?' The MPA support option **7.2(b)** which seeks to introduce a comprehensive programme of proposals based on a survey of high crime areas and the characteristics of crime in those areas. The MPA suggest that in assessing proposals the implications for policing are taken into consideration through liaison with the Metropolitan Police Department.

Issue 7.3 asks 'What facilities should be provided for the police and judiciary?' The MPA strongly support option **7.3(b)** which seeks to provide a borough-wide police patrol base and custody centre with good access to the strategic road network, introduce 'police shops' in town centres, provide accommodation for Safer Neighbourhood Teams in regeneration areas, as this is consistent with their established strategy as outlined in our previous representations.



### **Site Specific Allocations**

The MPA have a number of recommendations regarding the following site specific designations:

Site designation A03, Morrison's Superstore, King Street is a town centre retail site. The MPA support options **B**, which seeks to create a landmark gateway with more intensive use, including Community Hub as part of the redevelopment of Morrison's superstore with residential above and **C**, which seeks to make use of the site while retaining the existing building including provision of community hub uses alongside the retail store. The MPA would like to retain the existing Safer Neighbourhood presence in the immediate term in this location.

Site designation E15 which consists of selected sites along the south side of Uxbridge Road between Barnes Pickle and Culmington Road. The MPA support option **A** which seeks to promote a high density office redevelopment, with possible leisure/restaurant use on ground floor and subject to consolidation of town centre employment/office, tertiary education and civic functions - some mixed use of sites for residential will be considered. Pedestrian permeability is important and there is an opportunity for landmark, but the height of buildings and the residential impact will need to be examined.

Site designation G02 which consists of numbers 19-25 Oldfield Lane South, Greenford Hall, Greenford Methodists Church and 2-12 Ruislip Road. The MPA support options **A** and **B**. The town centre site forms part of the wider UDP development site, reference 87. Option A seeks to redevelop the site for community uses (including library, police, health, meeting/conference space, open space), retail, leisure, housing. Dependent with the retention and enhancement or satisfactory relocation of all existing community and faith facilities. Option B seeks to redevelop the site as a new Community Hub serving Greenford, including a range of facilities and an element of residential use.

Site designation S13 along Beaconsfield Road and South Road, Southall. The MPA support option **A** which promotes the retention/enhancement or relocation of all community, education occupants and uses in line with UDP development site 44.

I trust this is appropriate and will be taken into account during the Council's consideration of the New Issues and Options, and in particular in the Preferred Options version of the document. Please do not hesitate to contact either Sam Chisholm or myself should you have any queries.

Yours sincerely

**Matthew Roe**  
**Director**

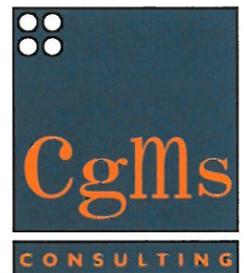
c.c. Metropolitan Police Authority

**BY POST AND EMAIL**

Our Ref: JAS/AE/6359

email address: alun.evans@cgms.co.uk  
Direct Dial: 02078321497

Planning Policy Department  
London Borough of Ealing  
Perceval House  
14-16 Uxbridge Road  
Ealing  
London  
W5 2HL



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  
Kettering, Newark

16 October 2009

Dear Sirs

**LONDON BOROUGH OF EALING  
DEVELOPMENT STRATEGY 2026 INITIAL PROPOSALS: ISSUES AND  
OPTIONS  
DEVELOPMENT MANAGEMENT POLICY DOCUMENT: ISSUES &  
OPTIONS  
REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY**

I write on behalf of our client the Metropolitan Police Authority (MPA) with regard to the above documents. The MPA provide a vital community service to the Borough of Ealing and policing is recognised within the 2008 London Plan as being an integral part of social infrastructure. Acknowledging this strategic policy context, the MPA have a number of representations concerning the Council's Development Strategy Initial Proposals: Issues and Options report and the Development Management Policy Document: Issues and Options.

Initially I provide some context to the MPA's representations, then detail established planning policy framework supporting the provision and development of policing, before outlining a number of specific comments and proposed alterations in order to ensure the Development Strategy 2026 and the Development Management Policy Document complies with the strategic development plan.

**Context to MPA's Representations**

The MPA previously made representations to the Issues and Options paper for Spatial Planning on 31 March 2006 and later to Ealing's New Issues and Options document on 17 October 2007. CgMs also met with Aileen Jones, Peter Lee and Anita Longworth from the London Borough of Ealing on 14 June 2006 in which the MPA's Estate Strategy and emerging Asset Management Plan (AMP) was discussed.



## Relevant Planning Policy

### *National Policy*

The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities. Also Circular 05/05 paragraph B9 advises developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision which would not have been necessary but for their development.

### *Strategic Policy*

At the strategic level, paragraph 3.99 of the London Plan (Consolidated with Alterations since 2004) states '*initiatives relating to policing and community safety and crime reduction are seen as increasingly important in improving the quality of life of many Londoners*'.

Policy 3A.17 Addressing the needs of London's diverse population states that the diverse populations needs should be met through the general and specific policies relating to the provision of social infrastructure including '*policing facilities*'. This policy has been altered from its original form in the 2004 version of the plan to recognise that the provision of police facilities is defined as an element of social infrastructure.

This is also reflected in Policy 3A.18 which states: '*Policies in DPDs should assess the need for social infrastructure and community facilities in their area, 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, community halls, meeting rooms, places of worship, public toilets, facilities for cyclists, convenience shops, banking facilities and post offices (also see Chapter 3D)*'. 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.

Policy 3A.26 also highlights the importance of '*ensuring communities benefit from development including through Section 106 agreements*' and improving safety and security.

Policy 3B.4 (Industrial locations) highlights the potential for surplus industrial land to help meet the strategic and local need for other uses such as social infrastructure.

The London Plan (Consolidated with Alterations since 2004) defines policing as a material consideration when assessing the impact of significant development upon policing and when formulating relevant development plan policy. It is therefore appropriate to ensure that the needs of the MPA are reflected within forthcoming Development Strategy and Development Management Policies document.

Mindful of this background, a number of representations are hereby set out below which take into consideration the policy context and MPA's objective.



## **Metropolitan Police Estate- Asset Management Plan London Borough of Ealing**

The need for additional policing facilities are highlighted in the Metropolitan Police Authority's AMP (copy attached) for the London Borough of Ealing and gives a summary of police requirements in the Borough.

## **Representations concerning Development Strategy 2026 Initial Proposal Document**

Mindful of the planning policy framework and the AMP referred to above, the following paragraphs detail the MPA's specific representations both in support of the emerging Development Strategy and, where appropriate, suggesting alterations. This is to ensure the Development Plan Document is 'sound' when submitted for examination in compliance with PPS12 since to achieve 'soundness' the document should be consistent with Government Guidance and the Strategic Development Plan.

### ***Executive Summary***

Bullet point 3 highlights that by 2026 Ealing will have enhanced existing and created new successful places and communities that have the necessary physical, social, community and green infrastructure and services. The MPA support this statement and are keen for its retention within the emerging Development Strategy.

#### Chapter 1

Within this opening paragraph, bullet point 2 states that one of the Borough's visions is to make Ealing one of the safest places in London. This vision complements the MPA's objective of delivering a safer London. The MPA support this statement and are keen for its retention within the emerging Development Strategy.

### ***Initial Proposal 1.1***

Sub-section (g) seeks to ensure community facilities are provided where and when they are needed. The MPA consider the description of community facilities as set out at section 6.2 of the Development Strategy is referred to at this point.

### ***Initial Proposal 1.2***

This section highlights the 'Delivery of the Vision for Ealing 2026' and point (e) supports the appropriate provision of social, physical and green infrastructure in the right locations and at the right time to support the level of housing and employment growth proposed for delivery in Ealing. This will be delivered through the Infrastructure Requirements and Delivery Plan.

This statement is consistent with London Plan policy 3A.18 which emphasises the need for social infrastructure and community facilities to be included within DPDs. Policing facilities are recognised as Social Infrastructure within the London Plan.

The MPA support this statement and note that the Infrastructure Requirements and Delivery Plan document is currently being prepared by the LPA and will be out for consultation towards the end of 2009, at which stage the MPA will make more detailed comments.



### ***Initial Proposal 6.1***

This section refers to Physical Infrastructure. The third bullet point within this section refers to the 'Public Realm'. The MPA suggests that this should include reference to 'Secured by Design' principles in line with the Metropolitan Police's 'Secured by Design' accreditation.

### ***Initial Proposal 6.2- Social Infrastructure***

This section identifies the police as a community service and identifies a number of requirements to specific services.

Chapters 2-4 highlight significant regeneration and growth with Ealing. In order for the Development Strategy to comply with Policy 3A.18 of the London Plan which seeks to ensure appropriate social infrastructure and community facilities are provided, it is recommended that an additional criterion is added, to ensure the successful delivery of the MPA's AMP.

**Recommendation: The MPA suggest that an additional bullet point is included within this section which reads:**

- **Police- Ensure adequate policing facilities are provided where appropriate to mitigate the impact of proposed borough growth upon policing. The MPS' Asset Management Plan (or revision thereof) will be used as guidance of the Borough based policing requirements for Ealing Borough.**

### ***Planning Obligations and Legal Agreements***

This section states that Section 106 agreements can be used to not only support the provision of community facilities, but also their maintenance or improvement. It also highlights the possible use of a Community Infrastructure Levy (CIL) for the provision of identified community infrastructure requirements.

In order to reflect CIL Guidance published by the Communities and Local Government Department, it is prudent to emphasise the necessity for securing planning obligations under Section 106 (Town and Country Planning Act 1990) to run parallel with the CIL.

Section 64 of the CIL guidance states that planning obligations sought through Section 106 will complement CIL, and notes in some cases planning obligations may be the only suitable tool to secure site specific benefits in particular. For example, whilst CIL will rely upon future forecasting of infrastructure requirements, policing requirements are generally influenced by geographic location, demographics, accessibility and the economy; all of which are factors outside of the MPA's control. The MPA's requirements are therefore difficult to forecast.

Accordingly, the MPA support the reference within the emerging Development Strategy to both planning obligations being secured through the traditional Section 106 route and the use of the CIL, where appropriate.



## **Representations and comments to the Development Management Policy Document**

Having made representations to the emerging Development Strategy, I now refer to those in respect of the Development Management Policy Document- Issues and Options, mindful of the policy framework set out above and the MPA's AMP.

### **Chapter 2: Living in Ealing**

#### ***Communities***

##### *Initial Proposal 5*

Initial Proposal 5 states that developers will be required to submit a social impact statement to address any increase in demand for community facilities, and that the Council will negotiate planning obligations with developers to mitigate against any increased demand for community services in the area. This approach is consistent with Planning Policy Statement 1 (PPS1), Circular 05/05 and the London Plan Policy 3A.18 in particular, and is generally supported by the MPA.

However it is noted within Initial Proposal 5 that the Council will generally resist development that would lead to the loss of community facilities. The proposal should be amended to ensure that there will be no requirement for developers to re-provide community facilities on sites where the former community facility has been successfully relocated.

This approach is supported by Policy 3A.18 of the London Plan which states that the *net* loss of community facilities must be resisted. To ensure this aspect of the emerging Development Management Policy document is consistent with the London Plan and reflects the MPA's Estate Strategy, the following amendment is suggested.

**Recommendation: The MPA suggest that the wording to this paragraph be changed to read (additional wording underlined):**

**'The Council will resist any development that would lead to a net loss of community facilities unless it can be demonstrated that there is no longer a need for community facilities at that location'**

#### ***Communities- New Issues and Options***

##### *Issue 5- Improved community facilities*

Mindful of the representations above (Initial Proposal 5), the MPA believe that an alternative approach through Option 5D should be provided within the Development Management Policies Document:

**Recommendation: Alternative wording for Option 5D (additional wording underlined):**

**Ensure either existing or replacement community facilities are upgraded or adequately provided to mitigate the impact of the future development.**



### *Issue 6- Alternative Development*

The MPA generally support Option 6B which states that where it can be shown that there is no need to retain a community facility on a site, consideration of alternative development is an option. This allows greater flexibility for sites within the Borough. However it is recommended that it is altered to reflect our representations to Initial Proposal 5 above. This will ensure compliance with London Plan Policy 3A.18 which allows for the *net* loss of community facilities, i.e. a replacement facility should be provided in proximity to that which is disposed.

### *Issue 7- Location of community facilities*

The MPA support option 7A for the provision of ward based Safer Neighbourhood Team Bases. The MPA also suggest under option 7D that reference to the provision of policing facilities is considered an acceptable use within employment areas, where their use is similar to B Class uses such as Patrol Bases doe example. This correlates with the recommendation below.

## **Chapter 3: Working in Ealing**

Initial Proposal 6 highlights four criterions which will be considered for proposals in defined employment locations, employment sites and the central Ealing office area. Whilst these allow for some degree of flexibility for alternative uses to be located in these areas, the MPA recommend that a specific criterion should be included which allows for alternative uses such as social infrastructure and housing. This will ensure consistency with London Plan Policy 3B.4 (Industrial Locations) which supports the use of surplus industrial sites for such uses.

**Recommendation: The MPA recommend that an additional point be included within this section of the document which reads (additional wording underlined):**

**v) consider alternative, non-employment designated uses such as social infrastructure, or where appropriate housing-led mixed-use development, within surplus employment land.**

## **Chapter 6: Climate Change**

### *Initial Proposal 19*

This proposal refers to development within Flood Zones, and in particular requires development within Flood Zone 3 to relocate to areas with a lower flooding probability.

Whilst the MPA support the principle of this approach, it is pertinent to note that the draft policy proposal does not reflect emerging Government Guidance within the proposed amendments to Table D2 of PPS25 – Flood Risk Vulnerability Classification. This highlights that police facilities which are not required to be operational during flooding can be appropriately located in Zone 3 if required.

Mindful of this context, and in order that the emerging Development Management Policies Document is consistent with Government Guidance, Initial Proposal 19 should be amended accordingly.



**Recommendation: We recommend Initial Proposal 19 is amended to include an additional criterion (additional wording underlined):**

- (iii) **allow 'Less Vulnerable' Uses, as defined within PPS25, where it can be demonstrated that such uses are not necessarily required to be operational during periods of flooding.**

## **Chapter 7: Design for Ealing**

### *Issue 18- Community Safety (Secured by Design)*

The MPA support option 18A and encourage the retention of UDP Policy 4.4 and supports the strengthening of 'Secured by Design' principles.

### **Conclusion**

Mindful of the draft consultation documents and overarching planning policy, the MPA would like to reiterate their main policing concerns which should be implemented within this document, including:

- I. Overarching Policy Support For Policing;
- II. Support for policing facilities to be located on surplus industrial/employment sites and in town, neighbourhood and local centres; and
- III. Policing facilities are adequately provided in response to growth and large-scale developments;

I trust the above is taken on board by the Council in formulating the next draft of the Development Strategy and the Development Management Policy documents. Should you have any queries or wish to discuss the nature of these comments and representations, please do not hesitate to contact either Matthew Roe, Julieanne Saxty or myself at this office. I would be pleased to hear the LPA's response to the proposed amendments during preparation of the next draft.

Yours faithfully

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

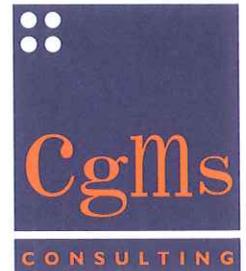
c.c. Metropolitan Police Service

**BY POST AND EMAIL**

Our Ref: SJ/AE/6359

email address: alun.evans@cgms.co.uk  
Direct Dial: 02078321497

Planning Policy Department  
London Borough of Ealing  
Perceval House  
14-16 Uxbridge Road  
Ealing  
London  
W5 2HL



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  
Kettering, Newark

30 November 2010

Dear Sirs

**LONDON BOROUGH OF EALING  
DEVELOPMENT STRATEGY 2026 FINAL PROPOSALS DOCUMENT  
REPRESENTATIONS ON BEHALF OF THE METROPOLITAN POLICE  
AUTHORITY/SERVICE**

I write on behalf of our client, the Metropolitan Police Authority/Service (MPA/S), with regard to the above document.

**Context to Representations**

The MPA/S previously made representations to the Issues and Options paper for Spatial Planning on 31 March 2006, to Ealing's New Issues and Options document on 17 October 2007 and most recently to Ealing's Development Strategy 2026 Initial Proposals document on 16 October 2009. For reference purposes, a copy of our October 2009 representations are attached.

As set out in our previous representations the Metropolitan Police provide a vital community service within the Borough of Ealing and policing is recognised within the 2008 London Plan as being an integral part of social infrastructure. Acknowledging this strategic policy context, the MPA/S have a number of representations concerning the Council's Development Strategy Final Proposals document.

Initially I provide some context to the MPA/S's representations, then detail established planning policy framework supporting the provision and development of policing, before outlining a number of specific comments and proposed alterations in order to ensure the Development Strategy 2026 complies with the strategic development plan.

## **Relevant Planning Policy**

I draw your attention in particular to the policy background which supports the provision of policing. It is essential to ensure that the LPA understand the planning policy background which supports the MPA/S' representations. Provision for policing and supporting the MPA/S' objectives is a key strategic requirement in order to ensure that safe and secure communities are developed across the Ealing.

I therefore provide a synopsis of relevant Government Guidance and Planning Policy immediately below (full details were provided in CgMs' representation letter to the Issues and Options draft Development Strategy (letter dated 16 October 2009, as attached).

### Relevant Planning Policy

#### *National & Strategic Policy*

- PPS1 - paragraph 27 (iii) development plan preparation the need to promote communities which are healthy, safe and crime free is confirmed.
- 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.
- Adopted London Plan (2008) – Policies 3A.17, 3A.18, 3A.26, 3B.4, 4B.6 and supporting text ref 3.99 support the provision of relevant social infrastructure, which specifically refers to policing within its definition.
- Emerging London Plan (2009) – further reinforces the need for adequate policing facilities across London within Policies 2.6, 2.13, 2.15, 3.17, 4.4, 4.6, 7.3 & 7.13.

## **Representations concerning Development Strategy 2026 Final Proposals Document**

Mindful of the planning policy framework and the Council's response to our previous representations, the following paragraphs detail the MPA/S's specific representations both in support of the emerging Development Strategy and, where appropriate, suggesting alterations. This is to ensure the Development Plan Document is judged 'sound' when submitted for examination in compliance with PPS12. The guidance confirms 'soundness' is achieved by ensuring the emerging development plan is consistent with Government Guidance and, in particular the Strategic Development Plan.

### **Final Proposal 1.1 – Spatial Vision for Ealing 2026**

Eleven strategic objectives are set out in this proposal. Sub-section (e) makes a commitment to creating a healthy and safe place to live and ensure the necessary physical, social and green infrastructure and services as identified in the Infrastructure Delivery Plan are provided and enhanced. The MPA/S supports this statement and are keen for its retention within the emerging Development Strategy.

Sub-section (h) sets out the vision for ensuring excellence in urban design and makes reference to designing out crime. The MPA/S generally supports this vision however, we strongly recommend that reference (or cross reference to section 6.1) is made to 'Secured by Design' principles in order for the Strategy to

be consistent with the requirements set out by both national and strategic policy. In particular, the Development Strategy should be consistent with PPS1 which states that 'Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities' and with paragraph 4.114 of the London Plan which seeks to ensure that 'developments are secure, taking into account the objectives of 'Secured by Design''.

### **Final Proposal 1.2 - Delivery of the 2026 Vision for Ealing**

Final Proposal 1.2(b) seeks to manage the release of employment land in terms of their long-term protection, medium-term release and short-term release. The MPA/S have identified the potential of employment sites in helping to deliver their operational objectives by providing strategic custody and patrol facilities on a Borough or Sub-Regional basis, or to provide Pan-London facilities, where appropriate. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similarly designated locations. Indeed, the Council have previously approved policing facilities on employment designated land, at Perivale and Greenford Industrial Estates.

This approach is supported by Policy 3B.4 of the London Plan which in dealing with Industrial Locations 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, emerging Policy 2.17 of the draft London Plan which deals with Strategic industrial locations 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 Development 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 strategic policy in this regard, reference should be made within this section to the provision of social infrastructure, including policing, as appropriate alternative uses on employment land.

#### *Recommended Alteration (Additional text in Italics and Underlined)*

Managed release of employment sites will involve categorising employment sites into three broad categories: -

- Long-term protection - these sites are the core employment sites which should be the Borough's primary focus for general industrial and warehousing land. Where appropriate these sites may also accommodate office development and alternative employment-generating uses, including community infrastructure, where appropriate.
- Medium-term release - ... [As proposed text]

Final Proposal 1.2 (c) supports the provision of appropriate physical, social and green infrastructure in the right locations and at the right time to support the levels of housing and employment growth to be delivered in Ealing, and maintenance of an Infrastructure Delivery Plan and Schedule, indicating the phasing and funding of infrastructure development. This policy is consistent with national and strategic policy which seek to ensure that appropriate infrastructure is provided to mitigate the impact of new development. The MPA/S

support this statement and are keen for its retention within the Development Strategy document.

### **Final Proposal 6.1 - Physical Infrastructure**

In our previous representations to the Initial Proposals document we referred to the third bullet point within this section entitled 'Public Realm'. The MPA suggested that this should 'include reference to 'Secured by Design' principles in line with the Metropolitan Police's 'Secured by Design' accreditation. The 'Public Realm' has now been removed from this proposal all together. In order to ensure the emerging Development Strategy complies with the London Plan (as per our representations above), we strongly recommend that it be reintroduced with the addition of reference to 'Secured by Design', as per our previous representations.

### **Final Proposal 6.2- Social Infrastructure**

This section identifies the police as a community service and identifies a number of requirements to specific services. The MPA/S support the reference to community services, and inclusion of policing as part of 'social infrastructure', which is consistent with national and strategic policy requirements.

### **Final Proposal 6.4 – Planning Obligations and Legal Agreements**

This section outlines the Council's strategy in terms of planning obligations and legal agreements. It states that contributions will be sought towards appropriate infrastructure where the impacts of a development need to be addressed. This approach reflects adopted and emerging Strategic Development Plan (London Plan) policy and therefore the policy can be considered 'sound'. The MPA/S support the reference within the emerging Development Strategy to both planning obligations being secured through the traditional Section 106 route and the use of the CIL, where appropriate. This complies with the Adopted and emerging London Plan and thus should be retained within the adopted policy.

### **Appendix Four - Infrastructure Delivery Schedule**

The Infrastructure Delivery Schedule (IDS) summarises the planned infrastructure, phasing, delivery mechanism and contingencies outlined in the Infrastructure Delivery Plan (IDP).

Within the IDS reference is made under the 'Emergency Services' category to the planned provision of additional neighbourhood police bases, office space and centralised police base and custody centre. The MPA/S supports the inclusion of policing facilities as part of the IDP however, in order to ensure the future delivery of policing facilities across Ealing, the MPA/S recommend that the IDP be updated to reflect the MPA/S' current Infrastructure Plan (attached).

I trust the above is taken on board by the Council in formulating the final Development Strategy document. Should you have any queries or wish to discuss the nature of these comments and representations, please do not hesitate to contact either Matthew Roe, Sophie Jamieson or myself at this office. I would be pleased to hear the LPA's response to the proposed amendments.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Alun Evans', followed by a long horizontal line extending to the right.

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

c.c. Metropolitan Police Service

## **Appendix C**

### **Section 17 of the Crime and Disorder Act**



# Crime and Disorder Act 1998

## 1998 CHAPTER 37

### ARRANGEMENT OF SECTIONS

#### PART I

##### PREVENTION OF CRIME AND DISORDER

#### CHAPTER I

##### ENGLAND AND WALES

###### *Crime and disorder: general*

1. Anti-social behaviour orders.
2. Sex offender orders.
3. Sex offender orders: supplemental.
4. Appeals against orders.

###### *Crime and disorder strategies*

5. Authorities responsible for strategies.
6. Formulation and implementation of strategies.
7. Supplemental.

###### *Youth crime and disorder*

8. Parenting orders.
9. Parenting orders: supplemental.
10. Appeals against parenting orders.
11. Child safety orders.
12. Child safety orders: supplemental.
13. Appeals against child safety orders.
14. Local child curfew schemes.
15. Contravention of curfew notices.
16. Removal of truants to designated premises etc.

###### *Miscellaneous and supplemental*

17. Duty to consider crime and disorder implications.
18. Interpretation etc. of Chapter I.

#### CHAPTER II

##### SCOTLAND

19. Anti-social behaviour orders.
20. Sex offender orders.
21. Procedural provisions with respect to orders.
22. Offences in connection with breach of orders.
23. Anti-social behaviour as ground of eviction.
24. Noise-making equipment: police power of seizure.

#### CHAPTER III

##### GREAT BRITAIN

25. Powers to require removal of masks etc.
26. Retention and disposal of things seized.
27. Power of arrest for failure to comply with requirement.

#### PART II

"school" has the same meaning as in the [1996 c. 56.] Education Act 1996.

*Miscellaneous and supplemental*

**17 Duty to consider crime and disorder implications**

- (1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.
- (2) This section applies to a local authority, a joint authority, a police authority, a National Park authority and the Broads Authority.
- (3) In this section—
  - "local authority" means a local authority within the meaning given by section 270(1) of the [1972 c. 70.] Local Government Act 1972 or the Common Council of the City of London;
  - "joint authority" has the same meaning as in the [1985 c. 51.] Local Government Act 1985;
  - "National Park authority" means an authority established under section 63 of the [1995 c. 25.] Environment Act 1995.

**18 Interpretation etc. of Chapter I**

- (1) In this Chapter—
  - "anti-social behaviour order" has the meaning given by section 1(4) above;
  - "chief officer of police" has the meaning given by section 101(1) of the [1996 c. 16.] Police Act 1996;
  - "child safety order" has the meaning given by section 11(1) above;
  - "curfew notice" has the meaning given by section 14(6) above;
  - "local child curfew scheme" has the meaning given by section 14(1) above;
  - "parenting order" has the meaning given by section 8(4) above;
  - "police area" has the meaning given by section 1(2) of the [1996 c. 16.] Police Act 1996;
  - "police authority" has the meaning given by section 101(1) of that Act;
  - "responsible officer"—
    - (a) in relation to a parenting order, has the meaning given by section 8(8) above;
    - (b) in relation to a child safety order, has the meaning given by section 11(8) above;
  - "sex offender order" has the meaning given by section 2(3) above.
- (2) In this Chapter, unless the contrary intention appears, expressions which are also used in Part I of the [1991 c. 53.] Criminal Justice Act 1991 ("the 1991 Act") have the same meanings as in that Part.
- (3) Where directions under a parenting order are to be given by a probation officer, the probation officer shall be an officer appointed for or assigned to the petty sessions area within which it appears to the court that the child or, as the case may be, the parent resides or will reside.
- (4) Where the supervision under a child safety order is to be provided, or directions under a parenting order are to be given, by—
  - (a) a social worker of a local authority social services department; or
  - (b) a member of a youth offending team,the social worker or member shall be a social worker of, or a member of a youth offending team established by, the local authority within whose area it appears to the court that the child or, as the case may be, the parent resides or will reside.
- (5) For the purposes of this Chapter the Inner Temple and the Middle Temple form part of the City of London.

**CHAPTER II**

**SCOTLAND**

**19 Anti-social behaviour orders**

- (1) A local authority may make an application for an order under this section if it appears to the authority that the following conditions are fulfilled with respect to any person of or over the age of 16, namely—
  - (a) that the person has—
    - (i) acted in an anti-social manner, that is to say, in a manner that caused or was likely to cause alarm or distress; or
    - (ii) pursued a course of anti-social conduct, that is to say, pursued a course of conduct that caused or was likely to cause alarm or distress,to one or more persons not of the same household as himself in the authority's area (and in this section "anti-social acts" and "anti-social conduct" shall be construed accordingly); and
  - (b) that such an order is necessary to protect persons in the authority's area from further anti-social acts or conduct by him.
- (2) An application under subsection (1) above shall be made by summary application to the sheriff within whose

**Appendix D**

**Planning Inspectorate Note No.953**

**The Planning Inspectorate**  
**PINS NOTE 953**

To: All Inspectors

Date of Issue: June 2005

Currency: until further notice

**SECTION 17 OF THE CRIME AND DISORDER ACT 1998**

**Background**

1. PINS Note 717 informed Inspectors that [s17 of the Crime and Disorder Act 1998](#) is not a material planning consideration and its use in planning decisions may be ultra vires and potentially challengeable. This guidance was based on advice we received from DETR Legal. However, following further recent discussions with ODPM Legal we have learnt that this advice is not entirely correct.

2. We have now been advised that a LPA must have regard to s17 in exercising its functions as a planning authority. These will include the formulation of planning policy and the determination of planning applications. However, s17 does not bind the First Secretary of State as it relates to the exercise of functions by a LPA and the FSS is not under the same duty to have regard to it. He cannot therefore use s17 as a means of justifying a particular decision. Nevertheless, although s17 itself is not a material consideration as far as the FSS is concerned, its subject matter - crime prevention - can still be a material consideration in determining an appeal.

**Action**

3. In examining the soundness of a development plan it is in order for an Inspector to evaluate draft policies prepared by a LPA according to its duties under s17. However, s17 would not, in itself, be material to an Inspector's consideration of a planning application in cases where the LPA has relied on such policies. Where a LPA has referred to s17 as the basis for, or as one of the reasons for, reaching its decision, Inspectors should continue to make their decisions in accordance with [s38 \(6\) of the Planning and Compulsory Purchase Act 2004](#) but they should take crime prevention into account as a material consideration (where this is relevant) and should show that they have dealt with the issue on the basis of the advice in [PPS1: Delivering Sustainable Development](#) and [Safer Places: The Planning System and Crime Prevention](#).

4. It is suggested that in appeals where the parties have referred to s17 Inspectors should deal with the matter by saying the following :

*"I note that the [local planning authority or whichever party] has referred to s17 of the Crime and Disorder Act 1998 [as the basis for (or as one of the reasons for) reaching its decision]. However, s17 relates to the exercise of functions by a local planning authority and the First Secretary of State is not under the same duty to have regard to it. Nevertheless, while s17 is not, in itself, a material consideration for the First Secretary of State, its subject matter - crime prevention - may be a material consideration in determining an appeal."*

6. PINS Note 717 is hereby cancelled.

Cgms

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