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Title	MPS Response to the Draft London Plan 2019-2041
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Summary	MPS Response to the Draft London Plan including background and suggested changes
Creating Branch, Code & OCU	TP CPIC – Prevention and Partnerships Team
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BRIEFING NOTE

Draft Forthcoming London Plan 2019 - 2041

Report by Design Out Crime Officers on behalf of the MPS

EXECUTIVE SUMMARY

The London Plan is a strategic plan which shapes how London evolves and develops. All planning decisions should follow London Plan policies, and it sets a policy framework for local plans across London. Consultation on the plan is open and comments must be received by 5pm on Friday 2 March 2018. Full details are available online:

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

We believe the draft wording of the new London Plan will hinder our ability to reduce crime and demand by adapting the built environment. We have made recommendations in part 2 of this document to ensure this can continue.

This submission comes at a time when operationally we continue to work even harder to reduce violent crime on our streets, push safeguarding to the top of the agenda and the tempo of counter terrorism work remains high. The MPS needs the support from within the London Plan to maximise the effectiveness of the cost effective prevention work that we are doing. Our proposals are outlined in Part 2 and without these our ability to continue this good work will be hindered.

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Part 1: Background. **Part 2:** Proposed Wording changes with explanatory notes

Part 1: Background



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The London Plan is a strategic plan which shapes how London evolves and develops. All planning decisions should follow London Plan policies, and it sets a policy framework for local plans across London. Consultation on the plan is open and comments must be received by 5pm on Friday 2 March 2018. Full details are available online:

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The Metropolitan Police Service (MPS), along with many other public sector organisations, is facing huge challenges with rising demand in a tight financial situation and we are highly scrutinised in the work that we do. It is therefore vital that the MPS are able to use its people and resources in the most efficient and effective way possible to serve the people of London.

The existing London Plan plays an important role in our ability to work in this current climate and reduce demand. The MPS has specially trained, Design Out Crime Officers (DOCOs), who currently work with developers, local authority planning departments and architects on residential and commercial developments across London. We do this by 'designing out crime' within the built environment, utilising the guidance, principles and initiatives of the MOPAC owned 'Secured by Design' (SBD).

The MPS has successfully worked with London borough planning policy departments, to ensure that local policy incorporates designing out crime advice and Secured by Design. We are able to do this with the wording of the existing London Plan and this enables us to ensure new and refurbished buildings in London are safe and secure. This is not only in terms of real reductions in crime and anti-social behaviour but also reducing the economic, social and environmental impact of crime.

The SBD work conducted so far by the MPS DOCOs has resulted in huge future cost savings for the MPS:

- Value of future residential burglaries prevented = £2m
- Value of future commercial burglaries prevented = £870k
- Values of future crimes in car parks prevented = £690k

With other minor cost savings this represents a total cost saving of £3.5m

These cost savings do not include the wider economic, social and environmental costs of crime to society.

We acknowledge and fully support the submission made by Police Crime Prevention Initiatives Ltd under the trading name of Secured by Design, but believe that the MPS should make its own submission as part of the consultation process. Adapting the physical environment to prevent crime happening in the first place is not only vital to the MPS but more importantly to the people of London. The MPS has made a huge investment in Design Out Crime Officers and this is testament to our dedication to the principles of designing out crime.

We believe the draft wording of the new London Plan will hinder our ability to reduce crime and demand by adapting the built environment. We have made recommendations in part 2 of this document to ensure this can continue.

This submission comes at a time when operationally we continue to work even harder to reduce violent crime on our streets, push safeguarding to the top of the agenda and the tempo of counter terrorism work remains high. The MPS needs the support from within the

London Plan to maximise the effectiveness of the cost effective prevention work that we are doing. Our proposals are outlined in Part 2 and without these our ability to continue this good work will be hindered.

Part 2: Proposed Wording changes with explanatory notes

Strategic Policy D1 London's form and characteristics:

Development Plans, area-based strategies and development proposals should address the following:

A The form and layout of a place should:

5) achieve safe and secure environments –

The MPS ask that this be amended to: “achieve safe environments that are resilient to crime and anti-social behaviour, by actively engaging in the police Secured by Design process”.

6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.

The MPS agrees in principle.

8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area

The MPS ask this paragraph be amended to: “encourage and facilitate crime free active travel through the provision of safe and secure infrastructure with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area, especially during the hours of darkness”

B Development design should:

3) aim for high sustainability standards

The MPS agree in principle, as successful Secured by Design certification and the use of enhanced certified security products actively promotes sustainability in terms of reduced carbon costs over time

3.1.5 Measures to design out crime should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.

The MPS ask this paragraph be amended to: “Measures to design out crime according to the Secured by Design scheme, should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety in a sustainable and positive manner. Developments should include good

natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.”

Policy D2 Delivering good design Initial evaluation

E Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.

The MPS supports this as it actively encourages early consultation with DOCOs during the design process.

Maintaining design quality

H The design quality of development should be retained through to completion by:

- 1) having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments
- 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design

The MPS supports this policy as it not only promotes consultation with DOCOs but also encourages inclusion of key specifications and standards at design stage.

3.2.8 The scrutiny of a proposed development’s design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.

The design and access statement should explain the approach taken to these design issues and be used to consider if a scheme meets the requirements of Policy D1 London’s form and characteristics (see also requirements of Policy D3 Inclusive design).

The MPS agree with this in principle as a Design and Access statement allows the developer to explain at any early stage how crime and ASB issues will be addressed in their proposal and the incorporation of Secured by Design measures.

3.2.10 It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish 24. Consideration should be given to securing the design team’s ongoing involvement as a condition of planning permission, or as a design reviewer where this is not possible. (24 Mayor’s Design Advisory Group. Shaping London: How can London deliver good growth? 2016)

The MPS supports this as it encourages continuity through the entire design and build process and enables the effective integration of Secured by Design measures. This strategic approach to crime prevention will also enhance sustainability.

Policy D3 Inclusive design

A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:

- 1) can be entered and used safely, easily and with dignity by all
- 2) are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment

MPS DOCOs liaise with Occupational Health professionals to deliver inclusive secure environments.

B The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.

The MPS support this; early consultation with the Secured by Design process can be included in a Design and Access statement

3.3.3 Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion.

The MPS ask this be amended to: “Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion. To achieve this, consultation with Designing Out Crime Officers is necessary at an early stage.”

3.3.4 Entrances into buildings should be easily identifiable, and should allow everyone to use them independently without additional effort, separation or special treatment. High and low level obstructions in buildings and in the public realm should be eliminated. The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.

The MPS ask this be amended to “Entrances into buildings should be well sited and lit, accessible from the street (where possible), enjoy plenty of natural surveillance and should allow everyone to use them independently without additional effort, separation or special treatment. High and low level obstructions in buildings and in the public realm should be eliminated. The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.”

3.8.9 Safety considerations must be central to the design and operation of tall buildings. Policy D10 Safety, security and resilience to emergency provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, and other hazards and Policy D11 Fire safety sets out specific requirements to address fire risk.

The MPS ask this be amended to “Safety considerations must be central to the design and operation of tall buildings. Policy D10 Safety, security and resilience to emergency provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, crime and other hazards and Policy D11 Fire safety sets out specific requirements to address fire risk.”

This includes a specific reference to crime as a hazard that can be minimised.

Policy D10 Safety, security and resilience to emergency

The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.

A) Boroughs should work with their local Metropolitan Police Service ‘Design Out Crime’ officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport

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Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment.

The MPS ask this be amended to “Boroughs should actively engage with their local Metropolitan Police Service ‘Design Out Crime’ officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area, and to support provision of necessary resilient buildings and infrastructure that maintain a safe and secure environment and reduce the fear of crime.”

B) Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

The MPS ask this be amended to “Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should always seek to include measures to design out crime that – in proportion to the threat – deter, detect and mitigate terrorist activity and its effects. These measures should be considered at the start of the design process to ensure they create a coherent, interlinked security regime that is (where required) aesthetically integrated into the development and the wider environment.”

3.10.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process (31.) This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

The MPS ask this be amended to “Measures to design out crime, according to the Secured by Design Scheme, including counter terrorism measures, should be integral to development proposals and considered early in the design process. (31.) This will ensure they provide adequate protection, and cost effectiveness does not compromise good design, or shift vulnerabilities elsewhere. In order to be effective, the measures to be incorporated into the development proposals must be proportionate to the assessed threat of or potential risk of an attack and the likely consequences of one.”

DOCOs act as first points of contact and will refer developers and architects to Counter Terrorism Security Advisors where appropriate

3.10.4 New development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of detecting intrusion, and delay any attempts at disruption until a response can be activated. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain

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appropriate design solutions, which respond to the potential level of risk whilst ensuring the quality of places is maximised.

The MPS ask this be amended to: “New development, including streetscapes and public spaces, should focus on creating effective protective security environments by drawing upon current Counter Terrorism principles. This comprises of designing in measures that deter terrorists, maximises the probability of their detection, and delaying/disrupting their activity until an appropriate response can be deployed. When considering appropriate protection against terrorist attack, there is an expectation that Metropolitan Police (Design Out Crime Officers and Counter Terrorism Security Advisors) will be consulted at an early stage, to ensure major developments contain design solutions, that are appropriate and able to mitigate the potential level of risk, whilst ensuring that good quality urban and environmental design principles are maintained.”

Policy D11 Fire safety

A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:

- 3) provide suitable and convenient means of escape for all building users
- 4) adopt a robust strategy for evacuation which all building users can have confidence in
- 5) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 4) how provision will be made within the site to enable fire appliances to gain access to the building.

3.11.2 The subject of fire safety is covered by Part B of the Building Regulations.

The MPS fully support this but ask the following addition is made to the last line of this policy: “Fire safety and security measures can be reconciled by early contact with a Designing Out Crime Officer at an early stage in the design process”

Policy S4 Play and informal recreation

5.4.3 Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads.

Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.

The MPS ask that the second paragraph of the above be amended to the following: “It is important for play and recreation space to be easily accessible through safe, well overlooked pedestrian routes with supervision from nearby dwellings. However, it is vital to reduce the potential for unnecessary footpath links throughout developments as they can significantly increase the likelihood of crime and anti-social behaviour.”

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To achieve this, placement of play and recreation space and any associated footpaths should be designed in from the outset as an integral part of the overall development and not an afterthought utilising unused plots of land”

5.4.4 There should be appropriate provision for different age groups, **including older children and teenagers. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs.** The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.

The MPS advises that communal areas such as playgrounds have the potential to generate crime and ASB; these areas should be well overlooked to allow supervision from nearby buildings and designed to provide facilities for all ages to use the area together with mutual respect. Early consultation with a DOCO is essential to ensure this.