



Mayor of London's "Draft New London Plan" 2019 – 2041: Consultation Response from 'Police-CPI - Secured by Design'.

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Introduction:

This response has been submitted by Ann Burroughs, on behalf of ANNBURR Consulting Ltd, who are acting as consultants for "Police Crime Prevention Initiatives-Secured by Design". (PCPI - SBD) [REDACTED]

A representative from Secured by Design will attend the public hearing if requested.

Police Crime Prevention Initiatives Limited is a 'not for profit' organisation which is now owned by MOPAC (Mayor's Office for Policing and Crime, London) and is focussed on preventing crime in the UK.

'Secured by Design' is the trading name of a number of crime prevention initiatives undertaken by Police CPI. PCPI's activities are wholly self-funded and reduce demands upon Police Services.

Established in 1989, Secured by Design is the title for a group of national police projects focusing on the design and security for new and refurbished homes, commercial premises, communal spaces, car parks and associated public realm.

Summary:

The forthcoming 'London Plan' is an important document for the region, setting the 'spatial development strategy' for the Greater London Area until 2041. In preparation for an increasing level of growth, density and footfall, this plan will provide strategic direction and guidance to all tiers of the planning system and prospective developers in the region.

Strategic Policy 7.3 "*Designing out Crime*" in the current London Plan, places a clear expectation that on a strategic level, "*Boroughs should seek to create safe, secure and appropriately accessible developments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion*" and "*developments should reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating*".

The Secured by Design initiative is clearly endorsed in supporting paragraph 7.10

The 'Integrated Impact Assessment' for the new London Plan, identified "*Crime as a key message and consideration that needs to be addressed*".



However, existing policy 7.3 and the endorsement of the Secured by Design initiative, have been deleted from the consultation draft. So, the Mayor's future strategy for 'Designing out Crime in the Built Environment' will be outlined by just five lines in supporting paragraph 3.1.5: Policy D1, 'London's form and characteristics'.

Secured by Design are extremely concerned that the proposed deletion of strategic policy 7.3 and its supporting paragraphs will have a lasting detrimental effect. Designing out Crime and ASB is a spatial planning issue, and should remain as strategic policy in the regions forthcoming 'spatial development strategy'.

Secured by Design is a nationally recognised police initiative with a proven track record, which is supported by the Home Office and specifically mentioned in the 'Modern Crime Prevention Strategy'. SBD is delivered by the Metropolitan Police Service - DOCO group and this framework provides an effective medium to deliver "Designing out Crime and ASB" in London.

The British Crime Survey and analysis of 'Police.uk' shows that there is an increase in reported and unreported crime. This includes crimes such as robbery, knife crime, youth related crime, rape, violence and sexual offences.

To mitigate, 'Designing out Crime' methodology can be applied in any development and the public realm and will provide crime solutions across all crime groups, significantly reducing opportunities for crime to occur.

Implementation of SBD guidance, will deliver reductions in reported and unreported crime locally and on a wider scale. For example, youth violence, knife crime and moped enabled crime are not restricted to a particular development or space. If the local environment enables a youth gang to operate, that gang will have an impact across a wider area, ward or borough. Adverse effects of the gang will also be apparent in the local area and potentially in nearby schools and colleges, buses, parks, streets and public realm.

Youth gangs are known to target vulnerable youth, either as victims of crime or potential gang members. 'Secured by Design' design principles are effective in all environments and by integrating them into the regions' infrastructure and major developments, communal areas, parks, associated public realm and education buildings, the Mayor will protect young people by reducing opportunities for "youth gangs" to influence and commit violent crime or anti-social behaviour.

'Designing out Crime' at an early stage will provide safe sustainable places where youth feel comfortable and promote safe play and leisure facilities. The combined effect of this will be to enhance 'safeguarding' and encourage more youth to socialise and exercise and spend less time on the internet, reducing their vulnerability to internet crime.

It is crucial that proportionate 'Designing out Crime' and 'Secured by Design' methodologies are embedded as strategic policy throughout the forthcoming London Plan. Furthermore, for this strategic policy to be applied and monitored effectively, it should include concise information on how to implement it.



Supporting Statutory Framework:

The purpose of the 'London Plan' and the wider planning system, is to contribute to the achievement of "sustainable development", which is defined as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*". (Resolution 42/187; United Nations General Assembly.)

- a) **"Integrated Impact Assessment"** (IIA) for the London Plan: February 2017, provides the baseline assessment for the forthcoming 'London Plan.'

The review of relevant plans, programmes and policies has identified a number of key messages that need to be taken into consideration when developing the London Plan and IIA objectives. "*Crime, Safety and Security – the design of the built environment and the mix of activities can significantly impact on fear and actual crime.*" (4.2.1)

Figure 5.1: "*Crime, Safety and Security*" directly impacts upon the following strategic objectives: Sustainability (SA), Equalities (EQIA), Health (HIA) and Community Safety (CSIA).

"The design of the built environment can significantly impact on people's fear of and actual crime. Suggested IIA objectives should be - to contribute to safety and security and the perceptions of safety". (5.5.16: Flowchart)

In conclusion, the IIA, identified "*Objective 4 - Crime*" as a key message and consideration that needs to be addressed in the New London Plan.

- b) **National Planning Policy Framework - 2012:** This national document defines, the "*three dimensions to sustainable development as economic, social and environmental, each being mutually dependent upon the other.*" (NPPF page 2)
- c) Section 7, paragraph 58 requires local authorities to produce 'Local and Neighbourhood plans' with a specific aim to "*create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion*".
- d) Furthermore, in Section 8, paragraph 69 the government has repeated this statement and supplemented it by adding that planning policies and decisions should ensure "*safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas*".
- e) **National Planning Policy Guidance:** This guidance accompanies National Planning Policy Framework and reiterates that designing out crime and designing in community safety should be central to the planning and delivery of new development. Practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation.
- f) **Section 17, Crime and Disorder Act -1998:** This legislation "*requires local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder*".
- g) **"Modern Crime Prevention Strategy - March 2016":** Home Office policy document excerpt(s) highlight that,
 - 1 "*there is conclusive evidence that crime increases when there are more opportunities to offend, and falls when the number of opportunities is*



reduced” so “the modern crime prevention strategy – is based on removing opportunities to commit crime”.

- 2 “Our new approach is based on targeting those six key drivers of crime: Opportunity, Character, Effectiveness of the Criminal Justice System, Profit, Drugs and Alcohol.*

The Modern Crime Prevention Strategy refers to ‘opportunity’ as the primary key driver of crime. Secured by Design achieves impressive reductions in crime because the focus is on “removal of opportunity” by proven crime prevention methodology.

- 3 We are working with the police to maintain the ‘Secured by Design’ brand, which is an important source of advice on how design of, for example, housing estates or shopping precincts can prevent crime and anti-social behaviour.”*

In summary, there is a raft of legislation, national policy and guidance that addresses the strategic need to reduce opportunities for crime, anti-social behaviour and terrorism in the built environment.

Crime is an ongoing issue in the city and has a direct impact on all three dimensions of sustainability. The effective mitigation of crime, anti-social behaviour and terrorism throughout the planning process, will enhance sustainability by positively impacting on people’s health and well-being, as well as the places they visit, work and live.

Independent, academic, evidence-based research, shows that Secured by Design has a huge impact on the alleviation of opportunity and ongoing reductions in crime. The planning system has a crucial part to play to support this and in turn, fulfil its role to ‘achieve sustainable development’ in London.

SBD urge you to reassess and include Secured by Design and Designing out Crime as a spatial planning strategic policy.

Secured by Design (SBD):

The Secured by Design initiative continues to promote new research, updating guidance documents to reflect changes in technical standards and technology and to ensure that the guidance and standards remain current. SBD offers guidance and standards that are compatible with all types of development.

There are three SBD development awards, Gold, Silver and Bronze. The latest version of SBD now incorporates several differing levels of security, starting at the highest level, SBD Gold which incorporates the security of the external environment together with the physical security specification. SBD Silver offers those involved in new developments, major refurbishment the opportunity to gain an award in the level of physical security provided. SBD Bronze offers a route to achieve a reasonable level of physical security for bespoke or refurbished properties or where a traditional enhanced security product is not available, or cannot be utilised due to listed building or other conservation status.

SBD design principles and official UK and EU physical security standards are nationally recognised, they can be integrated into any new development and achieve best results when implemented together.



This is important because implementation of this national initiative, enables the Mayor to set an expectation that every development addresses these issues and achieves where possible, a Gold development award. Setting this standard provides a means to identify and assess the extent of 'designing out crime' and 'security measures' implemented.

Monitoring would appraise the contribution to place making and development, as well as crime reduction and changes to perception of safety achieved across London.

Context dictates the conceptual ideas for design, layout and often the proposed planning use. Assessment of the environmental context, community safety and crime trends at concept design stage, enables 'secured by design principles and standards' to be integrated when defining masterplans and local plans as well as throughout design, build and commission of developments. This approach is proven best practice and will achieve the best possible outcome, without stifling creativity or architectural vision.

A Police Scotland study has found that 3,000 homes built to nationally recognised police crime prevention standards in more than 150 Kingdom Housing Association (KHA) developments in Fife experienced 87% fewer reported crimes compared to properties not similarly designed and protected. (Kingdom Housing Association – September 2017)

Anti-social behaviour is a significant issue in the London region. Some people may be particularly vulnerable to this and the ongoing stress can quite literally blight their lives. A victim of anti-social behaviour, may experience distress, a lack independence, mobility and ability to access support, they may not feel safe or want to go out and ultimately their well-being or mental health may be affected.

Strategic implementation of Secured by Design in Greater London will significantly reduce opportunities for crime and ASB to occur in the first place, improve the local environmental context for people living and working there and reduce subsequent demands placed on the MPS, local authorities and support agencies.

SBD - National Building Approval (NBA) is a scheme where some of the largest developers are joining to enable them to, integrate designing out crime into their developments whilst meeting the requirements of Building Regulation Part Q-Security and delivering all of the associated benefits for their clients, end users and London. Like the SBD development awards scheme, the NBA promotes sustainability and the new London Plan should include this as good practice.

Recent Case Study in South London:

The following case study (courtesy of the MPS – DOCO Group) highlights the positive impact of Strategic Policy 7.3 in the current plan, in one regeneration scheme in South London.

Design out Crime Officers worked collaboratively with the project team on the regeneration of an estate in South London. Prior to the regeneration, there were five tower blocks with inactive ground floors and lower ground parking.



1,000 residents lived mainly in bedsits with no private outside space. The area suffered a poor reputation with 50% of the units unoccupied and it was a significant crime generator focused on drugs, violence and gang related crimes on what is a relatively low crime borough.

£140m regeneration project was to provide homes for 3 000 people by mixing tenures, games pitches, a children's playground, a nature reserve and bike track.

The design of the regenerated development incorporated Secured by Design guidance, including active overlooking onto all public areas and car parking, private areas that are well lit, clearly identifiable and avoided unnecessary alleyways.

For physical security, the houses all have security rated doors and windows, external lighting, secure & climb resistant fencing. The apartments all have security rated doors and windows, access into the building and residential floors is by an access control system capable of being monitored by the housing association. All communal areas such as corridors, bin and bicycle storage are behind security rated doors.

The local ward records relatively low crime trends for London. There are 11 000 residents in the ward and 3 000 of those residents now live on the regenerated development.

In October 2017, analysis of recorded crime showed that in the previous 12 months, there were no burglaries, drug related crime, robberies, or weapons offences reported on the regenerated development.

Crime Type:	Ward Crime Profile:	Development Crime Profile:
Violence and Sex Offences.	20.6 per 1000 residents	3.3 per 1000 residents
Anti-social behaviour.	18.75 per 1000 residents	2 per 1000 residents
Overall crime	77 per 1000 residents	12.6 per 1000 residents.

The development has achieved full SBD certification (now SBD Gold) on completion of the first phase and this case study not only shows the success of Policy 7.3. It also confirms that SBD guidance is applicable whatever the environment and that by designing and equipping 'sustainable' developments, they will be safer, and opportunities for crime and anti-social behaviour to occur, are substantially reduced.

Secured by Design are considering commissioning further research on these findings.



Design out Crime Officers (DOCOs) – Delivery of SBD in London:

The Metropolitan Police Service (MPS), have recognised how effective ‘Designing out Crime’ and ‘Secured by Design’ is in the delivery of crime prevention, demand reduction, community safety and counter terrorism. It employs specialist DOCOs to implement this work with local authorities and the construction industry and act as non-statutory consultees during the planning process.

The MPS DOCO Group administers Secured by Design initiative, by offering ongoing consultation and liaison with planning authorities and prospective developers. DOCOs are the primary contact for enquiries in London and they focus on a collaborative approach with stakeholders, aimed at preventing crime, anti-social behaviour (ASB) and reducing the perception of crime in an area. With the long-term effect of achieving demand reduction for the Metropolitan Police.

To achieve this, DOCOs administer the SBD development awards, promoting the implementation of SBD design principles and physical protection standards in the built environment.

DOCOs are implementing SBD and Safer Parking principles in their work with Transport for London (TFL) to improve sustainability across the regions transport network. They support the “Vision Zero” initiative which aims to provide a secure transport infrastructure, improved lighting and safety on roads and cycle paths together with secure storage facilities for cycles and mopeds.

Commuter cycle crime in London has increased by 5%. Reducing cycle related crime and the fear of crime in London, will encourage commuters to cycle to and from work, thus reducing burden on the transport network whilst improving their fitness, health and well-being.

The SBD guidance documents and certification process, actively supports and compliments NACTSO “Crowded Place” guidance. DOCOs are the first contact, and when appropriate they refer consultees for specialist Counter Terrorist Security Advice.

Counter Terrorism Security Advisors (CTSAs): CT delivery in London.

National Planning Policy Guidance, paragraph 11: *“the UK faces a significant threat from international terrorism”* and that *“Taking proportionate security measures should be a central consideration to the planning and delivery of new developments and substantive retrofits. Crime includes terrorism, and good counter terrorism protective security is also good crime prevention.”*

Planning should promote appropriate security measures. *“Pre-application discussions between security advisors such as Counter Terrorism Security Advisors and police Crime Prevention Design Advisors will ensure that applicants are aware right at the beginning of the design process of the level of risk and the sorts of measures available to mitigate this risk in a proportionate and well-designed manner.”*

The ‘Modern Crime Prevention Strategy’ also endorses the work undertaken by the National Counter Terrorism Security Office, (NACTSO). Counter Terrorism security



advice is delivered by specialist Counter Terrorism Security Advisors from the Metropolitan Police.

A 'Memorandum of Understanding' (MOU) exists between the two disciplines whereby initial assessment of planning applications is undertaken by Design out Crime Officers during their consultation and they refer to the CTSA as necessary.

MOPAC:

The Mayor's Office for Policing and Crime (MOPAC) is directly accountable for police performance in the capital, setting out strategic direction and allocating resources across London in its 'Police and Crime Plan'.

"The primary objective of an efficient police is the prevention of crime: the next that of detection and punishment of offenders if crime is committed. To these ends all the efforts of police must be directed. The protection of life and property, the preservation of public tranquillity, and the absence of crime, will alone prove whether those efforts have been successful and whether the objects for which the police were appointed have been attained." Sir Richard Mayne, 1829.

The above statement defined the primary objectives of the Metropolitan Police Service when established in 1829. Times have changed considerably since then however, the prevention of crime, protection of life and property and preservation of public tranquillity are all highly relevant strategic objectives for the Police, MOPAC and the Mayor of London.

The Mayor Sadiq Khan has recently published the new "Police and Crime Plan for London" which sets out his ambitions for the safety of our capital. "A safer city for all Londoners" sets the current situation and priorities for London:

"After years of reductions, crime is on the rise in England and Wales, including in London. Crime is also changing. As crimes such as burglary and robbery have decreased, reports of the most serious and complex offences, including sexual abuse and domestic violence, have increased. Online offences have quickly grown to become one of the most common types of crime."

Very recent research published in January 2018 reports that police recorded crime figures are actually up however, experience tells us that even in circumstances where crime has been reduced, focus should not be lost, as when this begins to happen, it can often be the catalyst for increasing crime rates. If the strategic policy on Secured by Design and Designing out Crime is deleted, this could be the outcome across numerous crime groups.

The Metropolitan Police Service are due to lose 10% or 3 000 officers over the next three years and make further savings of up £400 million. The MPS are currently working towards merging boroughs and support services to streamline costs as well as exploring ways to take demand out of the system. In this environment, alternatives to demand policing must be found.

Legislation and national planning policy all present clear directives on the importance of a strategic approach to designing out crime in the planning system. This should be reflected in the New London Plan by including effective strategic policy requiring



Designing out Crime and SBD to be integrated into all major developments throughout London.

‘Secured by Design’ is a national initiative, which is owned by MOPAC and endorsed by the Home Office in the Modern Crime Prevention Strategy. Evidence based academic research has proven that the integration of ‘Designing out Crime and Secured by Design’ will help to deliver sustainable developments. SBD development awards provide a recognised standard and framework and implementation can be monitored to assess effectiveness.

Economic and social costs of crime:

In terms of costs, just one incident of crime can incur a range of personal, economic and environmental costs, immaterial of where the crime is committed.

- a) The victim may experience considerable distress, increased fear of crime and/or a lack of independence, inconvenience and economic loss.
- b) There may be ongoing costs for support agencies including healthcare and social services.
- c) Local policing costs for victim care, investigating the crime and any subsequent criminal justice proceedings.
- d) Where property is damaged, maintenance costs incurred to repair or replace the item, as well as associated environmental costs incurred by manufacture, transportation and installation.

Environmental impact of crime:

Academic research conducted over a number of years, conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO₂ per annum. This is roughly equivalent to the total CO₂ output of 6 million UK homes.

The environmental benefits of Secured by Design are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage.

Both of the above statements are supported by independent, academic research that is evidence based.

This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards. These impressive reductions highlight that the crime reductions are achieved not only inside the buildings but in the external environment as well.

Existing London Plan:

As explained in the summary above, the current “London Plan” (Policy 7.3) does refer to and promote the ‘Secured by Design initiative’ (paragraph 7.10) and sets an expectation that prospective applicants and developers consult with Metropolitan Police “Design out Crime Officers” pre-planning to address crime prevention. However, there is no requirement for SBD design principles and physical security standards to be incorporated into the design or build and no mechanism to measure the extent of uptake or effectiveness.



In the current 'London Plan', strategic policy 7.13 "Safety, security and resilience to emergency" requires all stakeholders to maintain an environment that is resilient against emergencies including fire, flood, weather, terrorism and related hazards set out in the 'London Risk Register'.

This policy, which includes terrorism is retained in the consultation draft as Strategic Policy D10 but, there is no reference to mitigation of crime or anti-social behaviour.

Forthcoming London Plan:

The draft consultation document for the forthcoming London Plan places great emphasis on the importance of good design however, the previous endorsement of the nationally recognised Secured by Design framework has been deleted.

Strategic policy 7.3, has been replaced with a broad reference to "designing out crime" principles in supporting paragraph 3.1.5. This presents a vague, unclear message regarding the strategic mitigation of 'Crime, ASB and Designing out Crime' in the regions planning system.

In the introduction to the draft consultation document, Sadiq Khan states "*This London Plan is fundamentally about taking a holistic approach and utilising all the levers we have in London to shape our city for the better, built around the needs, health and wellbeing of all Londoners. It combines a purpose and a vision. This new approach sets us up for some exciting and innovative times ahead as our population grows. But we need everyone to do their bit, including boroughs, developers, land owners, existing residents, architects and, of course, the Government.*"

The London Plan encourages collaborative working, but to enable "*everyone to do their bit*", the development plan needs to include sufficient information to enable all stakeholders to know what exactly is required of them. SBD urge you to reassess and include 'Secured by Design and Designing out Crime' as a spatial planning strategic policy.

Independent research shows that Secured by Design has a significant impact on the alleviation of opportunity and ongoing reductions in crime. The new London Plan will be the regions strategic spatial planning strategy and the ideal forum to set an expectation about SBD implementation in London. Inclusion of a strategic policy on Designing out crime, will enable the planning system to fulfil its purpose and 'achieve sustainable development' in London.

With regard to the consultation draft policies D1: A (5) & (8) & B and supporting paragraph 3.1.5. AND Policy D10 with supporting paragraphs 3.10.3 & 3.10.4. The SBD position is that they do not offer clear guidance on the issues. In their present form they are unclear, open to individual interpretation and difficult to measure or evaluate.

(SBD have appended a separate more detailed response on the draft consultation policies and supporting paragraphs below.)



Conclusions:

1. London is experiencing significant increase in growth and this is set to continue. Meanwhile London Boroughs and the MPS are experiencing major cuts to funding streams. In addition, crime is rising and there is an increase in the terrorism threat level nationally. MPS Commissioner Dick, described these factors as 'unprecedented' and stated that 'there is a need to take demand out of the system'.
2. To help achieve this, the Mayor and the new London Plan should continue to recognise the strategic value of the Secured by Design initiative and the work of DOCOs, across all types of development in London.
3. The forthcoming London Plan seeks to enable a planning system where *"everyone does their bit"* when setting policy, place-making and planning development(s). To accomplish this, there is a need for separate robust strategic policies for 'Designing out Crime and SBD' and Counter Terrorism Security Advice and NACTSO'.
4. Both policies should include an endorsement of the SBD development awards scheme, which will provide a consistent, nationally recognised set of design principles and official security standards for professionals to apply, having regard for the spatial and environmental context of each development.
5. For major development, developers should be expected to conduct early design stage consultation with DOCOs regarding the implementation of 'Designing out Crime', and wherever possible achieve the requirements set out in the SBD Gold development award.
6. It is essential that the Mayor takes a strategic approach to reduce opportunities for crime, anti-social behaviour and terrorism to occur in London. Whilst prevention of crime and terrorism are intrinsically linked, they should be addressed separately however, each policy should complement the other.

Recommendations:

To achieve this Secured by Design recommend that the New London Plan should:

- a) Include in strategic policy an expectation for planning authorities to integrate 'Secured by Design' and 'Designing out Crime and ASB' into their local plans, planning development policy and guidance documents.
- b) Clearly define in strategic policy 'Crime Prevention, Designing Out Crime & ASB in the Built Environment'. This policy should provide informative guidance for all parties in the development process, on how to satisfy its objectives and include an endorsement of the SBD development awards, as an appropriate means of delivery.
- c) Include clear guidance in the strategic policy, setting an expectation that having regard for their individual context, all major developments are to appraise and integrate the same nationally recognised SBD design principles and physical security standards (SBD Gold) during design, build and commission and that these measures be maintained there-after.



- d) Defining SBD as the standard in strategic policy provides the potential for ongoing monitoring, whereby the Mayor can identify and assess the extent of Secured by Design guidance implemented in the region, and the associated benefits achieved.
- e) Endorse Secured by Design (design principles and official physical security standards) as best practise to promote sustainability in the regions 'Smaller Developments'.

Part 2: Specific responses on Policy Statements and Supporting Paragraphs in the consultation draft.

In addition to the response and associated recommendations submitted above, Secured by Design also provide specific additional comment and recommendations for your consideration regarding a number of policies and sections in the draft forthcoming London Plan.

Whilst SBD assert the need for a dedicated strategic planning policy on Designing out Crime and ASB, we have provided this commentary on the existing draft to pinpoint areas where the initiative can support the plans aims and objectives, and to highlight areas where SBD recommend the inclusion of more detail or direction.

Comments and recommendations are for your consideration and are shown below:

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"

Secured by Design recommend that paragraph D1. A 5) includes the following: "achieve safe environments that are resilient to crime and anti-social behaviour, by actively engaging in the Police-CPI: 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."

Secured by Design agree and highlight the need for this relationship through all hours including night time economy times.

"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."

Secured by Design recommend that paragraph D1. A. 8) includes the following provisions:



“encourage and facilitate safe and 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”

Secured by Design support this policy and emphasise the fact that early implementation of the Secured by Design development awards, actively enhances sustainability. SBD continue to promote research into sustainability including British standards like BS 6375 “Performance for doors and windows” and refer you to the paragraph “the environmental impact of crime” above.

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.”

Secured by Design recommend that paragraph D1. B.3.1.5) includes reference to the ‘Police-CPI - Secured by Design’ initiative as a framework to apply when designing out crime and ASB, together with guidance for all parties on how the measures can be achieved. This will contribute to a sense of safety in a sustainable and positive manner.

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.”

Secured by Design support this policy as this encourages best practise in the form of 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.”

SBD supports early consultation with DOCOs and encourages inclusion of Secured by Design 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).”

SBD support the use of Design and Access statements. They provide an ideal forum for the applicant to explain to the planning authority, how they have addressed ‘Designing out Crime and ASB and Secured by Design’ during the design stages.

6.2.10 “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.”

This promotes an approach which encourages consistency and early commencement of an ongoing consultation with DOCOs, to enable effective integration of the Secured by Design Scheme.

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.”

On behalf of SBD, the Police DOCOs liaise with Occupational Health professionals to deliver inclusive environments.

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

Early consultation regarding the Secured by Design scheme is imperative and it should be included in the inclusive design 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.”

Secured by Design recommend that paragraph D3. B.3.3.3) includes reference to “consultation with Designing out Crime Officers 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.”

In addition to above, Secured by Design recommend that paragraph D3. B.3.3.4) includes “that entrances to buildings should be well sited and lit, accessible from the street (where possible) and enjoy with plenty of natural surveillance”.

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.”

In addition to above, Secured by Design recommend that paragraph D3. B.3.3.4) includes best practice to minimise the threats from ‘crime’ as well as fire, flood, terrorism and other hazards.

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 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.”

Having regard for the primary response above, Secured by Design recommend that if retained, the proposed draft Policy D10.A, includes reference to the provision of resilient buildings and infrastructure. This is to maintain a safe and secure environment but also to reduce the fear or perception 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.”

Having regard for the primary response above, Secured by Design recommend that if retained, the proposed draft Policy D10.B, includes reference to minimising physical risks from criminal activity.

In addition, there should be a clear expectation that development “always seek to include” design out crime measures that deter, detect and mitigate terrorist activity and its effects whilst remaining proportionate to the threat.



Early consideration is essential 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. 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.”

Having regard for the primary response above, Secured by Design recommend that if retained, draft paragraph D10: 3.10.3) be expanded to include specific reference to ‘implementation of measures to design out crime and ASB’ according to the ‘Police-CPI - Secured by Design scheme’.

Early consultation with DOCOs will reduce potential for cost effectiveness shifting vulnerabilities or compromising good design.

In order to be effective, the measures incorporated into the development proposals must be proportionate to the assessed threat or potential risk of an attack and the likely consequences of one.

SBD guidance and development awards, actively supports and compliments NACTSO “Crowded Place” guidance. DOCOs are the first point of contact, and if appropriate they refer consultees for specialist Counter Terrorist Security Advice.

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

Having regard for our response above, Secured by Design recommend that if retained, draft paragraph D10: 3.10.4) places a specific expectation that the Metropolitan Police (Design Out Crime Officers and Counter Terrorism Security Advisors) will be consulted at an early stage, to enable the provision of protective security environments by drawing on current designing out crime and counter terrorism security principles.

When required, major developments are expected to 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.

The measures designed in should deter terrorists, maximise the probability of their detection, and delay or disrupt their activity until an appropriate response can be deployed.



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.”

Secured by Design are committed to maintaining current guidance and up to date standards. Therefore, SBD has been working with the London Fire Brigade and Building Regulations to ensure that effective security is maintained in buildings and development without prejudicing other requirements and / or regulations.

This commitment and collaboration is ongoing and to facilitate this SBD recommend inclusion of “fire safety and security measures can be reconciled by contact with a Designing Out Crime Officer at an early stage.”

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.”

SBD recommend a content review of the statement ‘It should integrate into the wider network of open space’ and inclusion of the following:

It is important for the 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 potential for unnecessary footpath links throughout developments as they can significantly increase the likelihood of crime and anti-social behaviour.

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.”

“Communal areas, such as playgrounds and seating areas have the potential to generate crime, fear of crime and anti-social behaviour. They should be designed to allow supervision from nearby dwellings with safe routes for users to come and go and prevent child abduction”. Secured by Design – Homes 2016: Section 1:9.1.

Communal areas should as far as possible, be well defined, overlooked and designed to provide facilities for all ages to use the area together with mutual respect.

Policy HC6 Supporting the night-time economy:

“A Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), building on the Mayor’s Vision for London as a 24-Hour City.

B In Development Plans, town centre strategies and planning decisions, boroughs should:

- 1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available
- 2) improve inclusive access and safety, and make the public realm welcoming for all night-time economy users and workers.
- 3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums
- 4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas
- 5) ensure night-time economy venues are well-served with safe and convenient night-time transport
- 6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.

C Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and residents.”

Secured by Design are committed to collaborative working with a range of partners including Planning, Community Safety and Licensing Professionals to promote safety and security in the night time economy and a new design guide for Licensed Premises is currently being produced.

7.6.1” The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning,



wholesale and distribution, transport and medical services, which employ a large number of night-time workers.”

The hours of the night time economy are relevant when “Designing out Crime and ASB” and applies equally in other areas of the plan, including design, layout and travel. Early consideration and implementation of SBD principles at design stage, can mitigate many of the potential issues created by the night time economy and associated travel.

7.6.6 “There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, and making town centres safer by increasing activity and providing passive surveillance. Managing issues such as transport, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment.....”

As in Policy D1(8) above; Secured by Design principles can be integrated at design stage to encourage and facilitate safe and crime free active travel, through the provision of safe and secure infrastructure and legible entrances to buildings, that are well lit and aligned with peoples’ movement patterns and desire lines in the area”.

“Routes for pedestrian, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime and anti-social behaviour.” SBD - Homes:2016 Section 1:8.6.

Ann Burroughs.

on behalf of ANNBURR CONSULTING LTD.

