

FutureMerton team,
London Borough of Merton
London Road,
Morden,
SM4 5DX

Designing Out Crime Officer

Teddington Police Station
18 Park Road
Teddington
TW11 0AQ

Telephone: 020 8247 5834
Email: Pat.A.Simcox@met.police.uk
www.met.police.uk

14th December 2020

Dear Sir/Madam,

Re: Response to Merton's new Local Plan

Thank you for allowing me to comment on Stage 2a New Local Plan for Merton. I am a Designing Out Crime Officer (DOCO) with the Metropolitan Police Service (MPS) responsible for Merton borough. I administer the Mayor's Office for Policing and Crime (MOPAC) 'Secured by Design' (SBD) scheme.

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'.

SBD is a national, official police security 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 SBD will help to deliver sustainable developments. SBD development awards provide a recognised standard and framework and implementation can be monitored to assess effectiveness.

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 SBD 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 finest possible outcome, without stifling creativity or architectural vision.

The MPS, has recognised the efficacy of Designing out Crime and SBD 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.

By providing ongoing consultation focused on a collaborative approach with stakeholders, our team has a proven track record, backed by academic research, of reducing crime, anti-social behaviour (ASB) and reducing the perception of crime in an area, in new, and refurbished developments by working with planners, architects and developers at the design and planning stage. With the long-term effect of achieving demand reduction for the Metropolitan Police. To achieve this, DOCOs administer the SBD development award scheme, promoting the implementation of SBD design principles and physical protection standards in the built environment.

The SBD guidance documents and certification process, also 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 (CTSA). A 'Memorandum of Understanding' (MOU) exists between the two disciplines whereby initial

assessment of planning applications is undertaken by DOCOs during consultation and referred to the CTSA as necessary.

The consultation documents were forwarded to the CTSA's for their perusal, who have asked for the following to be included:-

Counter Terrorism Security Advisors (CTSAs) work with a range of stakeholders, notably Designing Out Crime Officers(DOCOSs) to create safer places and buildings, that are less vulnerable to terrorist attack and, should an attack take place, where people are better protected from its impact; many of which may be crowded places. Crowded places may be found in a wide range of locations, including sports stadia, pubs, clubs, bars, shopping centres, high streets, visitor attractions, cinemas, theatres and commercial centres.

Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to crime and disorder, and to do all they reasonably can to prevent crime and disorder. Crime for these purposes includes terrorism, and good counter-terrorism protective security is also good crime prevention.

In 2017, The Chief Planning Officer reminded local planning authorities of the important role the planning system plays in ensuring appropriate measures are in place in relation to counter-terrorism and crime prevention security.

The Stage 2a Draft Local Plan makes limited reference to 'anti-terrorism' alongside designing out crime, we would strongly recommend that strategic counter terrorism considerations have a more prominent position within the plan.

This is especially pertinent as the threat we face from terrorism is significant. Creating safer publicly accessible places and buildings, that are less vulnerable to terrorist attack, especially where they become crowded, should be the aim; this can be achieved by timely liaison with Designing Out Crime Officers (DOCOS) and Counter Terrorism Security Advisors (CTSAs).

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:

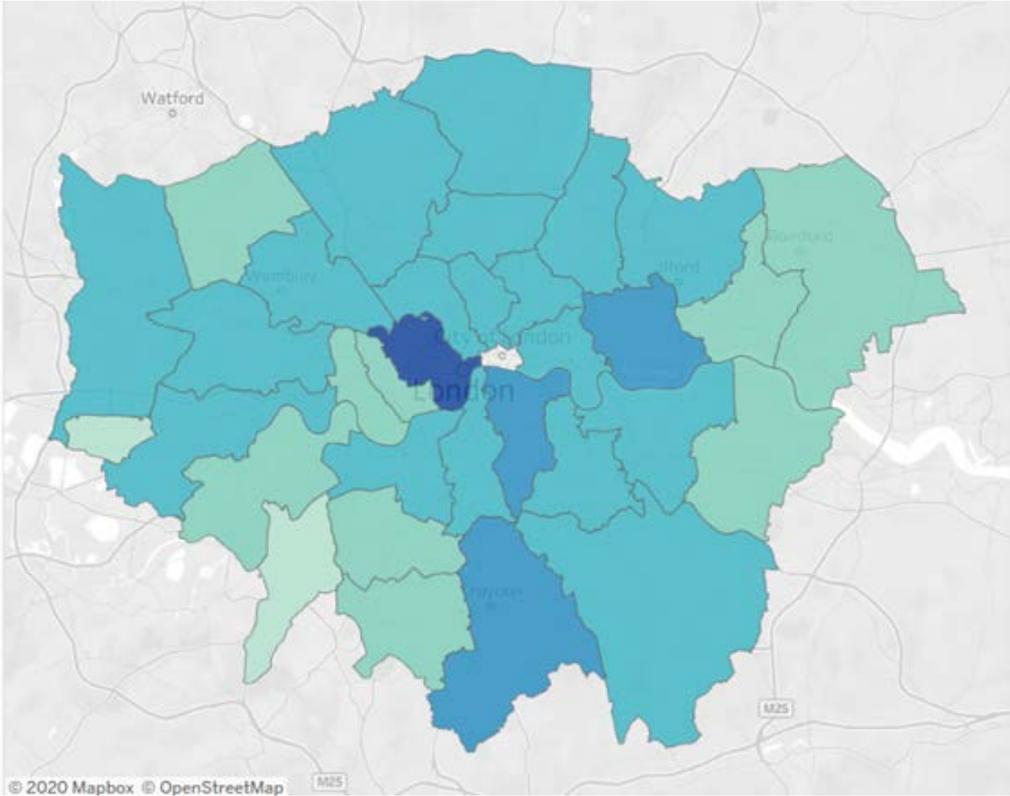
Academic research conducted over a number of years, conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO2 per annum. This is roughly equivalent to the total CO2 output of 6 million UK homes.

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.

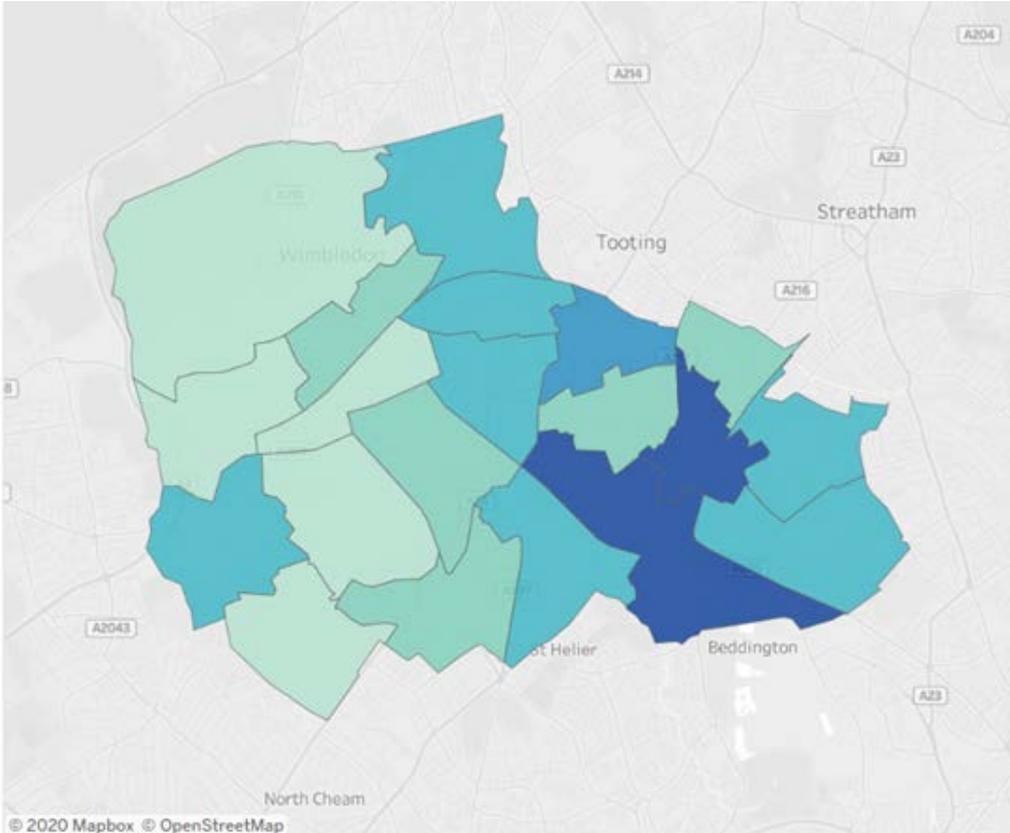
Both of the above statements are supported by independent, academic research that is evidence based.

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.

For the time period of December 2019 to November 2020 the crime rate in Merton compared with other boroughs in Metropolitan Police Service area is shown in the diagram below. Merton has a below average crime rate indicated by the lighter colour. The darker the shade for higher the crime rate. London has a crime rate of 89.47 per 1000 population with a crime count of 805,100. Merton has a crime rate of 66.41 per 1000 population with a crime count of 13,677. These values do not include ASB.



The map below shows the Merton borough divided into wards for the time period of December 2019 to November 2020. Although Merton borough, as a whole, has a below average crime rate Figges Marsh and Cricket Green ward has high crime rates and, Colliers Wood ward has an above average crime rate.

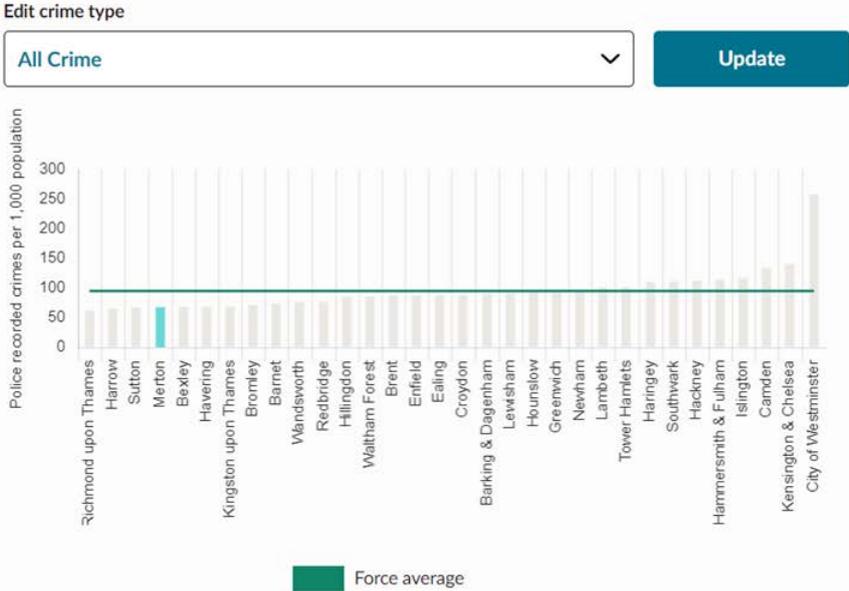


(Maps obtained 14th December 2020 from www.met.police.uk)

Below is a graph that compares the crime rate in Merton to the average crime rate across all the boroughs in the MPS area. It shows the total number of crimes over a twelve month period per thousand residents for all crime for the year ending June 2020. The force average crime rate is 94.78 and Merton crime rate is 67.50.

Crime in Merton compared with crime in other areas in the Metropolitan Police force area

In the year ending June 2020, the crime rate in Merton was lower than average for the Metropolitan Police force area.



(Statistics obtained 23rd December 2020 from www.police.uk)

The ten most prolific crime types in Merton borough for the month of November 2020 are listed in the table below. Far the greatest are anti-social behaviour and violence and sexual offences.

Crime type	Count
Anti-social behaviour	4836
Violence and sexual offences	4236
Vehicle crime	1871
Other theft	1079
Criminal damage and arson	1035
Drugs	782
Burglary	716
Public Order	703
Robbery	496
Shoplifting	430

(Figures obtained from www.police.uk on 24th December 2020)

By far the most common types of criminality in the built environment have historically been a variety of offences that come under Anti-social behaviour (ASB) as can be seen in the table above. Typically these can occur in new and existing developments and are costly, time consuming and difficult to resolve without input of public finances and a concerted multiagency partnership approach. ASB is a significant issue in Merton and it is worth noting that ASB has a marked impact on some of our most vulnerable residents the ongoing stress can quite literally blight their lives. A victim of ASB 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 which can often lead to depression and the perception that there is an increased fear of crime. In Merton we also have high levels of what is known as opportunistic criminality, this can be cycle theft, vehicle damage, theft of mail and any crime where an easy opportunity exists.

It is positive to see that security considerations appear embedded throughout multiple sections of the Local Plan for both existing and new developments with the Borough however we do have a few extra recommendation to the plan for consideration below.

On reviewing your consultation document, and paying particular consideration to prioritising the tackling of major crimes within Merton borough within the Strategic vision and objective of each topic and the six Neighbourhoods I would request the following statement be a consideration within all those areas.

The design and layout of the physical environment and physical building security is key to creating safe environments and reducing crime and disorder. Designing out crime 'Secured by Design' accreditation and the incorporation of its principles should be core, and form part of planning any new development, town centres, public spaces, transport hubs and streets.

It is noted from the proposals that 'Merton will experience notable change' (page 7 Good Growth Strategy) with 'the broad locations of Merton's growth area namely the Wimbledon/Colliers Wood/South Wimbledon Opportunity Area (OA) and Morden town centre' (page 11 Good Growth Strategy). 'The London Plan ambition for our OA is to provide 5000 new homes and 6000 new jobs over 10 years. Morden is expected to deliver circa 2000 new homes' (page 13 Good Growth Strategy). Development will take place in other areas across the borough on a smaller scale. There will be continued mixed use developments with commercial and residential aspects, high rise buildings with large density populations living within them and unused buildings/land repurposed for residential usage. There are also plans to encourage people into the Borough by improving the overall infrastructure connecting all areas within Merton and by the introduction of greener spaces/town squares within the new builds. The Borough is already improving its public transport and cycle provisions/routes and the current proposal seeks to further encourage means of alternative transport over cars by making car free developments where possible.

There is a risk of increased levels of crime and ASB if the proposed sites within this document are not properly designed. The increase in connectivity across the Borough could have impacts on the opportunities for crime (e.g. creating multiple escape routes or drug dealing/robbery hotspots) if the environment and mitigation measures are not fully considered. Whilst the increase in natural surveillance will be positive through introducing different-use designs and promising well-used pathways; if the spaces are not suitably controlled and owned through sensible design there is the likelihood that they could become misused instead. It will be paramount that early and continuing consultation with our unit to design out crime will help to ensure that town centres, public spaces, transport hubs, residential/commercial spaces and streets are as safe as possible for residents, visitors, and workers within these sites. The use of SBD Conditions to ensure compliance with the SBD Scheme will be especially important.

Page 5 of Chapter 02 Good Growth Strategy covers Crime and Safety and states:

Crime and safety

Merton is one of London's safest boroughs but has some of the same experiences of crime and disorder common with other London boroughs. The fear and the perception of crime within our residents is high with antisocial behaviour a major concern. The challenge we face is to make the borough a safer place using the tools such as Secured by Design approaches whilst ensuring it keeps the vibrancy that makes it such an attractive place to live, work and visit.

This paragraph is somewhat ambiguous, it should be recomposed to:

Merton is currently one of London's safest boroughs but it should be noted that it experiences the same crime trends and public disorder common throughout other London boroughs. The fear and the perception of crime within our residential

community is high, with antisocial behaviour a prevalent concern. The challenges of creating a safer environment in the borough is in part delivered by the principles of crime prevention and creating a safer physical place by using proven approaches, such as Secured by Design. By maintaining appropriate standards and the guiding principles in design we can ensure the borough maintains the vibrancy that makes it such an attractive place to live, work and visit.

I am greatly encouraged by item f. in the Chapter 03 Urban development objectives and vision

- f. Working with key stakeholders such as our local Metropolitan Police Service 'design out crime' officers and planning teams, Emergency Planning Authority and British Transport Police to identify community safety needs, policies and sites required for their area and support provision of necessary infrastructure to maintain a safe and secure environment**

New developments are expected to have a design lifespan of around 100 years plus and typically once the developer has finished the building their legal responsibilities pass onto the local authority or housing management team to rectify. Merton borough has an ambitious program of redevelopment and refurbishment in the housing estates, and new build regenerations of Wimbledon and Morden town centres. There are positive changes to increase housing stock, school places and the availability of high quality community facilities. If a bad design is built and then suffers crime issues, the ramifications for residents mean that any changes or retrofit security improvements become their responsibility with a commensurate increase in service charges or taxpayer/ council funded contributions to rectify.

Increased crime can also negatively impact on the environment and an effective crime prevention strategy can put in place appropriate low energy lighting for example that does not necessarily increase CO2 emissions. Crime prevention strategies can also implement effective secure cycle provision and the provision of electric vehicle charging points at the developers cost and this can also help the borough's future strategy to enhance and encourage sustainable transport for example. By having a considerate and appropriate set of policies specifically for Crime Prevention in place within the local plan for Merton these elements will have a long term cost saving for the borough and the taxpayer.

By working with our partners in the Development Control Department of Merton Council incorporating effective measures within buildings at the design and planning stages and using our collective experience we can better advise councillors and together contribute to an effective reduction in crime.

Any reduction in low level criminality will see a tangible benefit to our local and wider economy and a reduction in demand from front line and community Policing officers who can concentrate on investigating and prosecuting priority crime. Within the framework of Designing Out Crime we can address most of these emerging issues and put in place design strategies and physical security to reduce criminal opportunity and ensure sustainable development within the borough. Ongoing maintenance and management for the development is often overlooked and we can ensure that future issues are minimised and operating costs are kept reasonable so that monthly service charges for residents do not become contentious.

We work to Section 7 of the Mayor's London Plan: Living Spaces Policy (Below)

Policy 7.13 Safety, security and resilience to emergency

7.46 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process ^[21]. This will ensure they provide adequate protection, do not compromise good design, do not shift the vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat by way of the risk of an attack and the likely consequences of one. New development should incorporate elements that deter terrorists, maximise the probability of detecting intrusion, and delay any attempts at disruption until a

response can be activated (see also Policy [7.3](#) on designing out crime). Consideration should be given to physical and electronic security (including detailed questions of design and choice of material, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police should be consulted to ensure major projects contain appropriate design solutions, which respond to the potential level of risk whilst ensuring the quality of places is maximised.

The proposed New Local Plan provides information in Chapter 16 Place and spaces in a Growing Borough Strategic Policy LP D5.1 (Placemaking and design) and D5.3 (Design considerations in all developments) with the following directions to Architects and Developers shown below:-

- e. Designing out crime, anti-terrorism, dementia friendly, green infrastructure and measures to help manage flood risk should be actively considered at the earliest stage of planning the public realm depending on the location, scale, and setting of the development.

- c. Provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles;

I welcome the introduction of anti-terrorism into the document; alongside my CTSA colleagues comments earlier I would recommend that strategic counter terrorism considerations have a more prominent position within the plan.

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 Local Plan by including effective strategic policy requiring Designing out Crime and SBD to be integrated into all major developments throughout Merton. I would strongly recommend that all developments within the Borough are to achieve SBD accreditation and not just “developed in accordance with Secured by Design principles” as in the current Local Plan, as this wording does not necessarily guarantee that any consultations with a DOCO may occur or if one does that any further interaction will occur or any recommendations made will be implemented.

In this regard, due consideration should be paid to Section 17 of the Crime and Disorder Act 1998 which places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Embedding designing out crime and SBD within the document fits fully with this obligation.

The Secured by Design scheme can deliver safe and sustainable homes and businesses through techniques in crime prevention utilising independently tested products proven to resist forced entry. My colleagues and I strive to ensure that new developments across London reach the highest possible security standards, mainly through partnership working with the relevant Planning Departments and requesting conditions to comply with Secured by Design. By including a requirement in your new Local Plan that new applications must evidence how they will **comply** with Secured by Design, after proper consultation with Designing out Crime Officers, we will be better placed to deliver secure developments and schemes across the London Borough of Merton.

On a further note there is no definition in the Glossary for CTSA, DOCO or SBD.

Future objectives

My DOCO colleagues and I would like to propose that the following are part of our future objectives we would like to achieve for the Local Plan

- 1) **We feel that a specific Supplementary Planning Guidance Document dedicated to Designing out Crime and Terrorism would be useful in informing partners and assisting in the planning process to reduce crime in the long term.**
- 2) **We would like an updated planning condition relevant to Designing out Crime.**

Thank you again for seeking my opinion in relation to this important document. If you require any clarification of any of my comments, please do not hesitate to contact me at the above address.

Yours sincerely,

A handwritten signature in black ink that reads "Pat Simcox Doco". The signature is written in a cursive, slightly slanted style.

PC Pat Simcox,
Designing Out Crime Officer – SW

Sources

Crime statistics at www.police.uk and www.met.police.uk
Secured by Design information from www.securedbydesign.com
London Plan information from www.London.gov.uk
Crime and Disorder Act information from www.legislation.gov.uk
National Planning Policy Framework information from www.gov.uk

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

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