
Good morning all,

Please find attached the Metropolitan Police Designing Out Crime Office response to the Merton Character Study SPD consultation.

Please do not hesitate to contact me if there are any questions relating to this response.

Kind regards

| Designing Out Crime Officer | Metropolitan Police Service CPIC

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Crime Prevention Advice: [MPS Crime Prevention Advice](#)

MetSec Code: **OFFICIAL** (Unless otherwise marked)

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

Designing Out Crime Officer

Teddington Police Station
18 Park Road
Teddington
TW11 0AQ

www.met.police.uk

22nd February 2021

Dear Sir/Madam,

Re: Merton Character Study Supplementary Planning Document

Thank you for allowing me to comment on Merton Character Study SPD. 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.

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 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 (DOCOs) 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.

This is especially pertinent as the threat we face from terrorism is significant. Creating safer publicly accessible locations 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).

Given that the final adopted version of the Supplementary Planning Document (SPD) will influence future planning applications as well as neighbourhood plans and some Council decisions, we strongly recommend that strategic Counter Terrorism (CT) considerations be included within the document; currently there is no reference made to CT.

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.

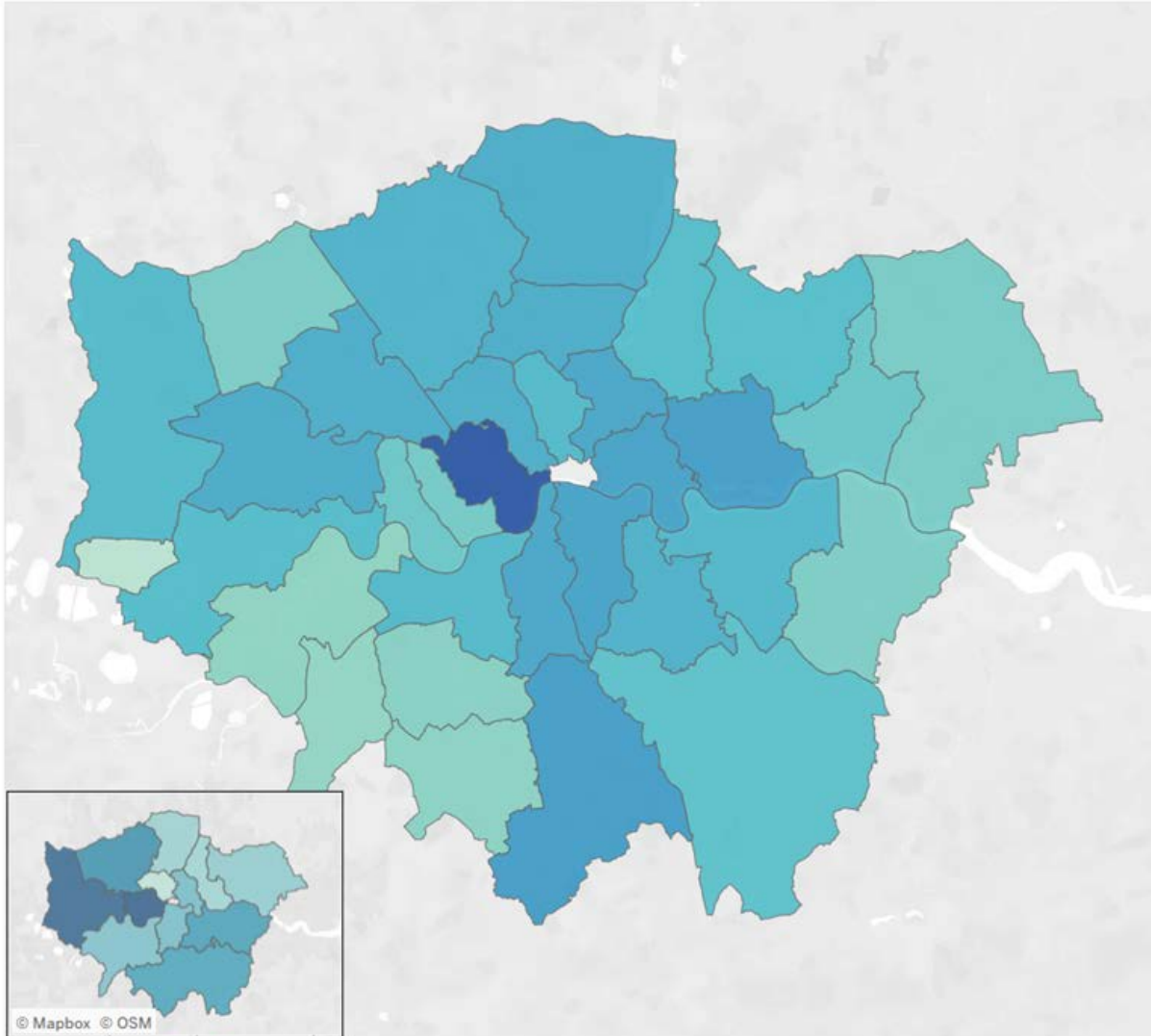
- a) The victim may experience considerable distress, increased fear of crime and/or a lack of independence, inconvenience and economic loss.
- b) There may be ongoing costs for support agencies including healthcare and social services.
- c) Local policing costs for victim care, investigating the crime 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:

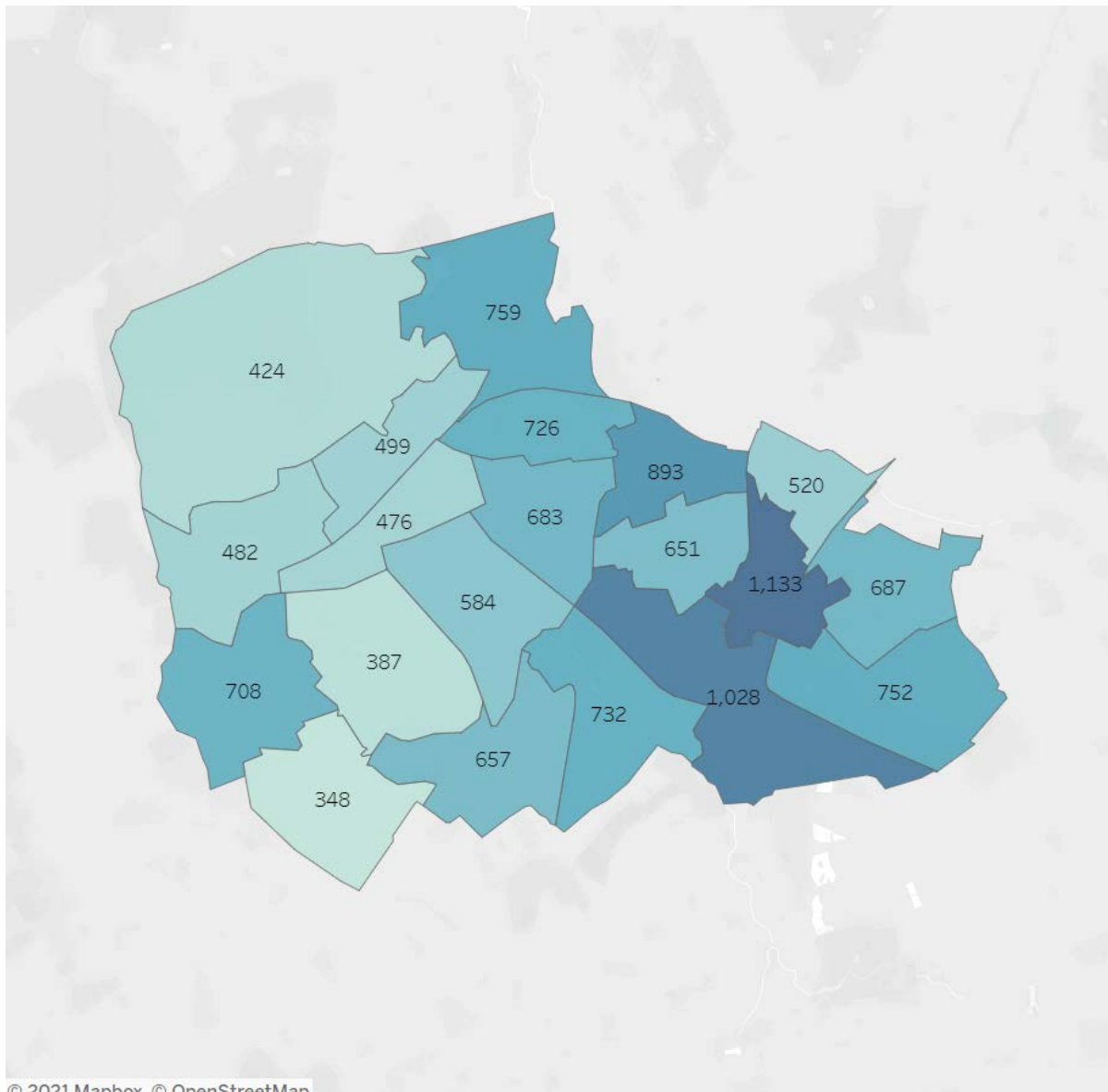
Academic research conducted over a number of years, conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO₂ per annum. This is roughly equivalent to the total CO₂ output of 6 million UK homes.

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, evidence based academic research. The crime reductions have 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 February 2020 to January 2021 the crime rate in Merton compared with other boroughs in Metropolitan Police Service area is shown in the above diagram. 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 85.21 per 1000 population with a crime count of 766,768. Merton has a crime rate of 63.90 per 1000 population with a crime count of 13,129. These values do not include ASB.



© 2021 Mapbox © OpenStreetMap
 (Maps obtained 24th February 2021 from www.met.police.uk)

The map above shows the Merton borough divided into wards for the time period of February 2020 to January 2021. 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.

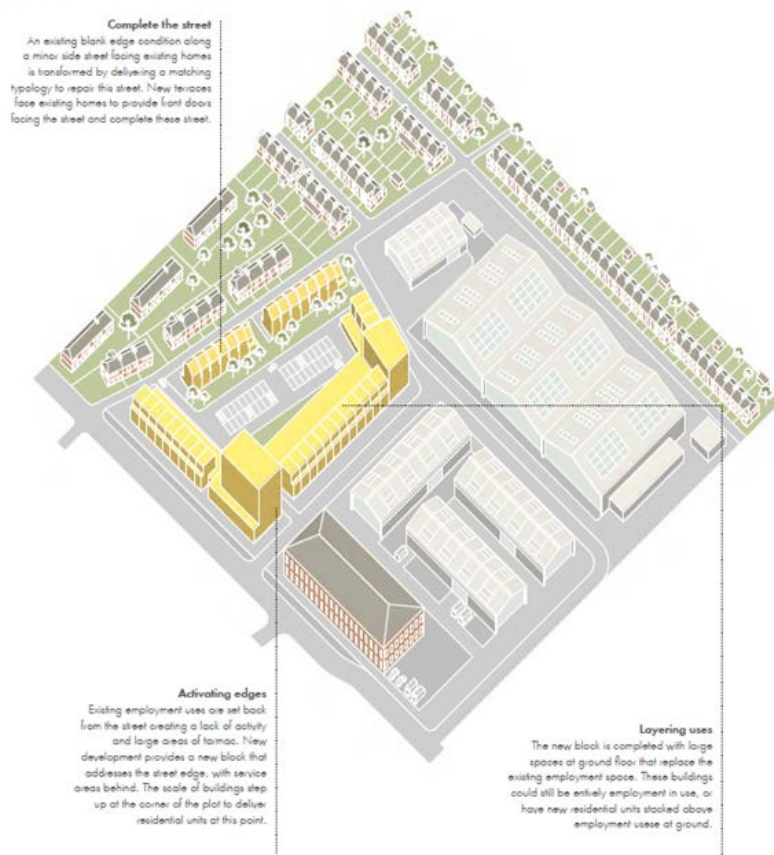
By far the most common types of criminality in the built environment have historically been a variety of offences that come under Anti-social behaviour (ASB). Typically these can occur in new and existing developments and are costly, time consuming and difficult to resolve without input of public finances 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.

There are **no references** of counter terrorism or crime in the Merton Character Study document. There is only one mention of security within *item 1 Safety and management* (page 133) of *A framework for character-led tall buildings*. Safety is also mentioned in *A framework for character-led tall buildings* and has numerous mentions as a category in the residential survey for the Character Study, residents in some areas of Merton felt safer than

others. Residents in the Morden area scored safety an average of 6, residents in Mitcham scored mainly 5 with some as low as 3, while Raynes Park residents scored 7-8 and the Wimbledon neighbourhoods scored safety between 6 and 9. Noted: the higher the value the more satisfied residents are with safety in their area.

Due the very low number of references, I feel this document does not show an adequate level of commitment to the existing and future residents of the borough. I believe it would be essential for safety, crime, security and counter terrorism to be taken as a significant factor within the Character Study.

After: A potential range of opportunities for context-led growth within the campus typology. Yellow indicates indicative proposals



Further to this P127 shows a potential campus typology creating a central rear car parking courtyard, this style of car parking arrangements are known to lead to problems with youths causing annoyance, criminal damage, violent crimes such as assault, and impact any feelings of safety amongst residents. (1) If the courtyard is isolated and lacking natural surveillance there is increased risk of crime and anti-social behaviour so should be avoided. Where communal parking is necessary it should of a small number of bays; be in viewing distance of active rooms of the adjacent properties; and gated.

Page 142 of the Merton Character Study 'identifies how the growth needed can be absorbed in a way which reinforces local character and allows it to evolve in response to need', shown below. **There is a risk of increased levels of crime and ASB if the proposed new sites within Character Study areas are not properly designed. The increase in intensification and 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.**

K FUTURE MERTON

The nature of growth for Merton

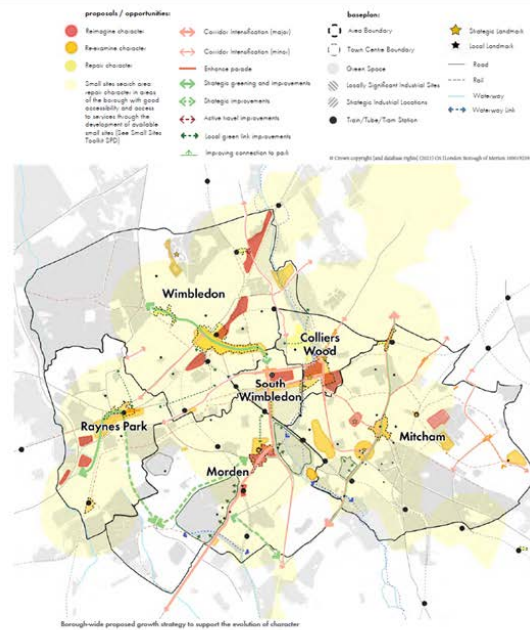
The pressure for growth and the need for homes applies to every London borough and Merton must play its part in supporting good growth. Every borough is different and the way in which it can accommodate targeted growth is also therefore different. As an outer London borough with a largely suburban character, Merton faces particular challenges in accommodating a step change in housing numbers.

This character study identifies how the growth needed can be absorbed in a way which reinforces local character and allows it to evolve in response to need. For Merton this means:

- An emphasis on supporting and reinforcing the role and character of town centres in the borough. This means reinforcing the existing character and qualities in most town centres whilst accommodating new functions – so allowing centres such as Wimbledon to intensify within acceptable limits and with a strong emphasis on environmental enhancement alongside growth.
- In two key centres, Morden and Colliers Wood, there is the opportunity to shape growth in a way which supports an evolution of these places with a more transformational impact. Both centres have elements of a strong town structure and can use interventions to enhance and evolve existing character – enabling them to grow into vibrant community hubs for the surrounding neighbourhoods.
- Reinforcing historic routes as the backbone of the borough, emphasising their importance as sustainable corridors, attractive environments and logical locations for investment. Many of these routes are ancient high roads and with investment can again be the focus for activity in the borough.
- Celebrating the borough's green infrastructure assets and network. The borough is blessed with a wealth of high quality green spaces that vary from wild resources to Green Flag Award winning recreational spaces that are cherished by residents. Many of the

housing neighbourhoods in the borough were planned around a network of green infrastructure, ensuring residents had access to sports grounds, formal gardens and biodiversity rich woodlands and heaths. Re-emphasising this built-in green infrastructure as well as promoting zones of green streets as green / active travel corridors could significantly enhance the character of the borough's neighbourhoods and their sustainability.

- Revitalising waterways as blue corridors and continuous walking and cycling spines could provide opportunities for both landscape restoration as well as new waterwise development. Broads and streams run through and alongside areas for future development and offer character-led opportunities for environmental enhancements and climate resilience.
- Strengthening the role of local parades and smaller centres as local hubs of activity has multiple benefits. Such an approach reinforces the identity and resilience of local neighbourhoods, allows intensification to happen in appropriate locations within suburban neighbourhoods, whilst also supporting local patterns of movement and the viability of commercial and community uses.
- Overcoming the barriers created by rail and road infrastructure through exploring opportunities for new development/uses and introducing new crossings could both enhance the accessibility and character of neighbourhoods and local centres. Improving existing crossings and introducing new crossings could transform how neighbourhoods are integrated.
- Managing transitions between areas through sensitive approaches to density and mixing as well as environmental enhancements. This will be particularly important for centres such as Morden and Colliers Wood, but also between industrial and residential areas to better support both activities. It will be important to value existing industrial/employment spaces such as along the River Wandle whilst looking for opportunities to ease the transition between areas and raise environmental quality generally.



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 Colliers Wood and Morden town centres mentioned in this document. 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.

Any planning proposals should demonstrate how designing out crime standards have been considered. SBD accreditation on developments will and is proven to reduce crime and its fear for residents and businesses. It is also vital in today's world of demand reduction, cost savings, and the drive for sustainability.

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.

On reviewing your consultation document, and paying particular consideration to prioritising the tackling of major crimes within Merton Character Study I would request the following statement be a consideration within all the neighbourhoods.

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.

Alongside my CTSA colleagues comments earlier I would recommend that strategic counter terrorism considerations have a 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 Merton Character Study by including effective strategic policy requiring Designing out Crime and SBD to be integrated into all major developments throughout Merton.

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 and 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, Counter Terrorism, DOCO or SBD, these need to be included.

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,

Designing Out Crime Officer – SW

Sources

Crime statistics at 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

(1) Armitage R. (2013) The Impact of Car Parking Design on Levels of Crime and Fear of Crime. In: Crime Prevention through Housing Design. Crime Prevention and Security Management. Palgrave Macmillan, London. https://doi.org/10.1057/9781137316059_9

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