
Good morning all,

I hope you are keeping well.

Please find attached the Metropolitan Police Designing Out Crime Office comments relating to the Small sites toolkit SPD consultation.

Please do not hesitate to contact me if there are any questions regarding these comments.

Kind regards

Designing Out Crime Officer | Metropolitan Police Service CPIC

Address: Teddington Police Station, 18 Park Road, Teddington, TW11 0AQ

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

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

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22nd February 2021

Dear Sir/Madam,

Re: Merton Small Sites Toolkit Supplementary Planning Document

Thank you for allowing me to comment on Merton Small Sites Toolkit Supplementary Planning Document including the Small Site Design and Access Statement Template and the Strategic Environment Assessment (SEA). 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 (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.

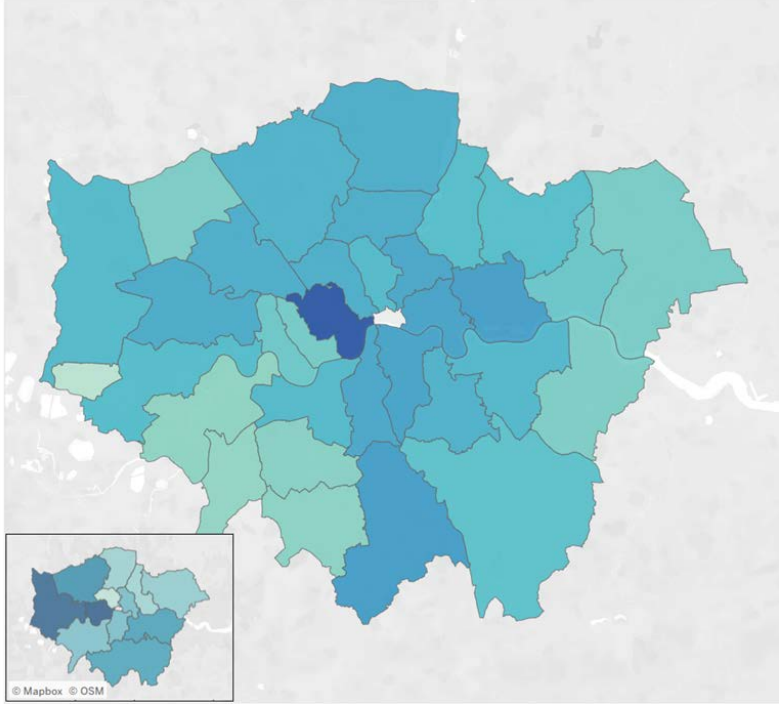
- a) The victim may experience considerable distress, increased fear of crime and/or a lack of independence, inconvenience and economic loss.
- b) There may be ongoing costs for support agencies including healthcare and social services.
- c) Local policing costs for victim care, investigating the crime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

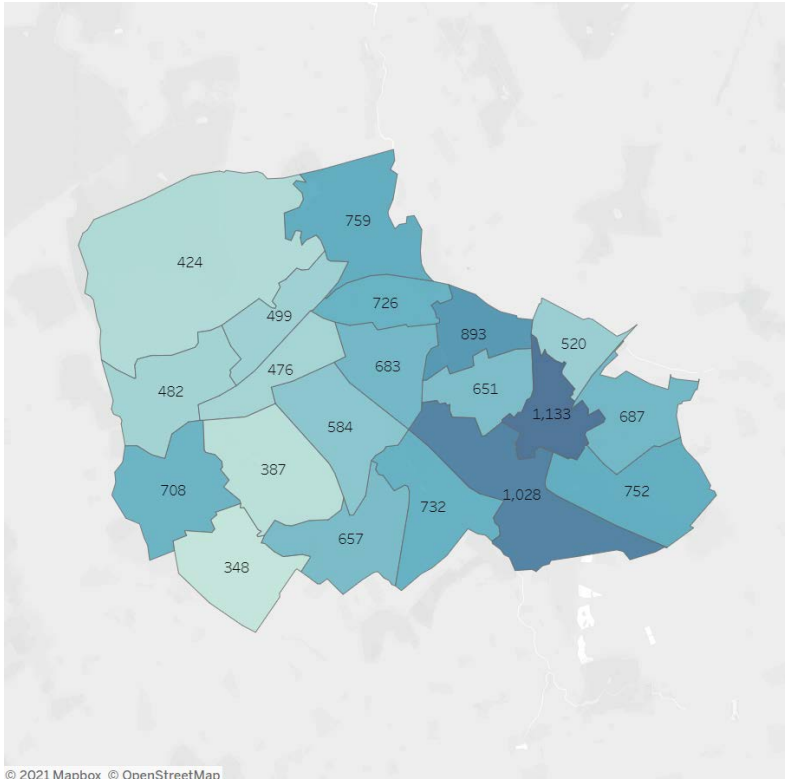
Academic research conducted over a number of years, conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO₂ per annum. This is roughly equivalent to the total CO₂ output of 6 million UK homes.

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 diagram to the left. 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 to not include ASB.



The map to the left 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.

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

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 many excellent points Merton Small Sites Toolkit SPD document relating to security and safety, however there are **no references** of counter terrorism.

Page 45 contains *How does your proposal promote safety?* Within section 6.1.28 mentions PCPI Secured By Design with a link to the Homes 2019 brochure.



ins, Evington

How does your proposal promote safety?

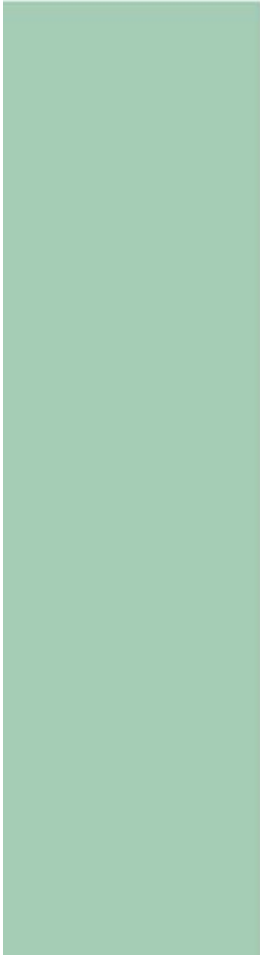
- 6.1.25 Your proposal should position windows to habitable rooms overlooking streets and shared access routes. This will help to animate the façades of the houses and improve natural surveillance.
- 6.1.26 The front entrance to a home acts as a threshold that accommodates a variety of everyday activities from collecting post to storing outdoor clothing. Entrances should be well lit, sheltered and safe in order to accommodate these functions. See PCPI Secured By Design: Homes for more details. Lighting should be designed and selected so that it does not adversely affect biodiversity and wildlife such as bats and birds. See Lighting: Threats to Bats by the Bat Conservation Trust for more details.
- 6.1.27 You must ensure that all exterior lighting meets the relevant UK standards for both minimum and average luminance. All new street lighting must minimise light pollution in line with current environmental requirements.
- 6.1.28 There are increasing crime problems associated with letterboxes, such as arson and 'fishing' for personal items like vehicle and house keys, credit cards, etc. In order to address such problems, where possible, incorporate mail delivery via a secure external letterbox or delivery 'through the wall' into a secure area of the dwelling.
- 6.1.29 Large developments sharing a communal entrance must have an access control system able to capture images of people using the door entry panel. Additional CCTV cameras may be installed as required covering communal entrances and lobbies, enabling visitors to be viewed from each residential dwelling. Also consider the incorporation of a secure airlock in your entrance area.



Fig.6.23 - This extension to an existing terrace promotes a sense of security by incorporating defensible space fronting the street. (Corner House, Southwark by 31/44 Architects) [Credit: Rory Gardiner]



Fig.6.24 - Airlock lobbies in larger buildings provide safety to reduce opportunities for intruders. (Mapleton Crescent, Wandsworth Metropolitan Workshop) [Credit: Simon Kennedy]



4. LAYOUT AND USE

How will the building layout provide safety and security?



In section 4 layout and use of the Merton small site design and access template (page 17) there is a section for *How will the building layout provide safety and security?* These references to security and Secured by Design are greatly welcomed.

Mention should be made in both documents to contacting the DOCO office, a free service, to discuss the incorporation of Designing Out Crime and Secured by Design within their designs.

There is a risk of increased levels of crime and ASB if the proposed new sites 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 is 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.**

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 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 Small Sites Toolkit 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 particularly in relation to the designated venues.

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 Small Sites Toolkit 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

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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