

Waltham Forest Planning Control

Designing Out Crime Office
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Email: matthew.fletcher2@met.police.uk
Dated: 14/09/23

Re: London Borough of Waltham Forest Local Plan LP1 “Shaping the Borough”- Consolidated Schedule of main modifications to Local Plan LP1 Post March 2023 Hearing Sessions.

Dear Waltham Forest Planning,

Thank you for allowing us to comment on the above planning policy document updates. We currently work in the Metropolitan Police Service Unit of Designing Out Crime Officers. Our unit administers the MOPAC ‘Secured by Design’ (SBD) scheme which is proven to reduce Crime and ASB in developments where it is successfully implemented. Our Team currently work in the North East Division, of which Waltham Forest is one of the 9 Boroughs that our team covers. **This follows on from our response provided on 14/12/20, the subsequent review by the Inspectorate and further internal consultation within Waltham Forest Planning Departments. We have the following comments:**

- 1) Page 140 of the amended Local Plan provides information on changes to original Policy 60 (Making Places Safer and Designing Out Crime) with the following direction to Architects and Developers:**

MM126	140	60	<p>Policy 60 - Making Places Safer and Designing Out Crime</p> <p>To improve community safety and cohesion Waltham Forest <u>the Council</u> will work with partners to:</p> <p>A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate 'Designing out Crime' and <u>Secured by Design principles</u>, and <u>require requiring</u> all major developments to <u>apply for development to achieve Secured By Design</u> accreditation via the Secured by Design scheme;</p> <p>B. Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder; <u>and</u></p> <p>C. Promote safer streets and public realm improvements throughout the Borough <u>borough</u>, where necessary in liaison with the Metropolitan Police <u>Designing out Crime Officers</u></p>	To combine the similar Policy 52 (Making Safer Places) With Policy 60 (Designing out Crime)
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Chapter 14: Creating High Quality Places				
Ref	Page	Policy / Paragraph	Modification	Reason
			(DOCOs), Counter Terrorism Security Advisors (CTSAs), Traffic Management <u>Unity Unit</u> (TMU) and with the British Transport Police (BTP).	

- 2) Having reviewed the amended documents we can confirm that the Borough has continued to show consistent and positive considerations throughout in regards to security and Designing Out Crime.** Security considerations are embedded throughout multiple sections of the updated Local Plan (See Appendix 2) for both existing and new developments within the Borough. **We agree that the merging of original Policies 52 and 60 makes sense considering the aims of both policies.**
- 3) We understand from Page 280 (New Appendix) that due to other changes within the document that Policy 60 is likely to be known going forward as Policy 58 – “Making Places Safer and Designing Out Crime”.** However as parts of the existing document still make reference to Policy 60: where Policy 58 or 60 is mentioned in this document, it is specifically referring to the security Policy of “Making Places Safer and Designing Out Crime”.
- 4) We are supportive in particular of Policy 58/60 (“Making Places Safer and Designing Out Crime”)** which specifically requires ensuring Crime Prevention Measures to Design Out Crime are incorporated for all developments.

- 5) **We are supportive that the wording changes previously requested in Policy 58/60 have been incorporated to strengthen the importance of SBD (e.g. “achieve Secured by Design accreditation” rather than “apply for”). This guarantees that SBD Conditions will be added at planning stages and ensure a proven crime-reduction MOPAC endorsed scheme is used across the whole Borough for a holistic view of crime prevention.**
- 6) **We do have a few extra minor recommendations for consideration below to help ensure that there is no ambiguity or conflict in any areas of security through the Local Plan.**

Further Considerations:

- A) Policy 9 Section I (South Waltham Forest) references for existing spaces “Improvements...that...incorporate Designing Out Crime and Secured by Design Principles (see Policy 60...)”. However this does not appear within Policy 10 (Central Waltham Forest) or Policy 11 (North Waltham Forest). **It is recommended that this link to Policy 58/60 is included in Policy 10 and 11 as well to ensure this consideration for the whole Borough not just the area that is expected to have the most growth and development.**
- B) **It is recommended that Policy 78/80 (Parks Open Space and Recreation) also references Policy 58/60 to ensure that improvements to such spaces are designed to ensure they are safe and welcoming for all users.**
- C) We also previously gave comment over concerns relating to Policy 66/68 – “Managing Vehicle Traffic” - in particular around the vulnerabilities for Car Clubs where there is the potential for sites to include public access within them. This has now changed to Policy 68 but Section O and P advise that Car Club recommendations “should be flexible for different users and adaptable for future repurposing to benefit the whole community” and be “Providing accessible spaces on site or contributions to deliver bays on-highway”. **There are concerns over secure sites providing potential public/non-resident access at any time and the associated increase in risks of Crime and ASB in such locations. Where Car Clubs are proposed, it is strongly recommended that these are within the Public Realm or are specific to the residential blocks and private use if in secured spaces.**
- D) For Policy 61/63 – “Active Travel” Section G it advises that sites should “Ensure the provision of secure public and on-site cycle parking facilities for occupiers and visitors, that are compliant with Waltham Forest Parking Standards, London Plan (2021) requirements and London Cycling Design Standards (LCDS), at prominent locations within the development site”. **It should be noted that whilst the LCDS guidance is currently being re-written, some of the advice within the existing document is outdated and can contradict current crime prevention best practice and may result in sites becoming insecure/more likely to suffer from Crime and ASB. A few examples are: double doorsets create a passive-leaf vulnerability if accidentally/purposefully left unlocked and are harder to manage with lots of users; double doorsets being cumbersome to gain entry through as a cyclist; motorised doorsets that can make tailgating easier/cycles more vulnerable and; cycle stores being accessed via the main residential lobby that can make the whole of the residential lobby space easier to gain entry into and may not be fire safety compliant).**

More recent guidance conducted by SBD, DfT, TfL, Sustrans and the Cycle Rail Working Group can be found at: <https://www.securedbydesign.com/images/05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf> .

It is recommended that Policy 61/63 also references Policy 58/60 to ensure that from a security perspective, current SBD and Crime Prevention advice in relation to cycles is given suitable weight for developments and a suitable compromise can be reached.

E) We previously gave comment in relation to the definition in the Glossary for SBD (see current below). This was to put emphasis on the fact that the scheme is not just about the shell of the building (e.g. “windows and doors”). **SBD incorporates a holistic approach to crime prevention to ensure that it includes the landscaping, public/amenity spaces, defensible space, access control, CCTV, lighting and the security rated and products for a development (more details can be found at www.securedbydesign.com). As this response is specific to the Policies and not the Glossary it unclear if this has been noted and changed/amended.**

Secured by Design- police flagship initiative supporting the principles of designing out crime; e.g. windows and doors that carry secured by design approval and have been assessed to provide a high degree of resistance to break-ins.

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 Core Planning Strategy that new schemes comply with Secured by Design after proper consultation with Designing out Crime Officers, we are better placed to deliver secure developments across the London Borough of Waltham Forest.

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

Yours sincerely,

Matthew Fletcher 2098CO
Designing Out Crime Officer
Metropolitan Police Service

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.

- **The National Planning Policy Framework (NPPF)**

Section 8 states

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion..."

Section 12 states

"Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

- **Section 17 of the Crime and Disorder Act 1988**

"It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it's area", as clarified by PINS953.

- **Policy CS16 - Making Waltham Forest Safer**

The Council will aim to improve community safety and cohesion by working with partners to:

- A) Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate principles and practices of 'Designing out Crime' and Secured by Design;
- B) Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder;
- C) Promote safer streets and public realm improvements throughout the Borough

19.3 -Section 17 of the Crime and Disorder Act 1998 places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Reducing crime is therefore not solely the responsibility of the Police.

19.6 - The design and layout of the physical environment is key to creating safe environments and reducing crime and disorder. 'Designing out crime' and designing in community safety should be core principles in planning any new development, town centres, public spaces, transport hubs and streets

19.14 -The Council will ensure that community safety measures are implemented in the Borough by ensuring that planning applications for new developments demonstrate how a development will incorporate the principles and practices of 'Secured by Design' and 'Designing out Crime'. Such measures could be highlighted through a supporting planning statement or design and access statement. These considerations will be particularly important in new schemes".

- **The London Plan 2021**

Policy D11 Safety, security and resilience to emergency states

B - 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 Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

C - Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, 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.

3.11.3 - Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police. Further guidance is provided by Government on security design. This will ensure development proposals 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.

3.11.4 - By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. 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 mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Strategic Objectives (Pg 13)

- 4. Support Waltham Forest's thriving, safe and attractive town centres
- 8. Improve the health and wellbeing of all who live, study and work in Waltham Forest.
- 9. Improve active and sustainable transport choices across the borough and beyond building on the success of the 'Enjoy Waltham Forest programme' and encouraging wider fully integrated walking and cycling routes.
- 9. Promote exemplary standards of design in place-making and the highest quality of development.
- 16. Ensure that engagement in plan-making is effective and actively involves residents, local organisations (such as community groups), businesses, infrastructure providers and statutory consultees.

Policy 6 (Ensuring Good Growth - Pg 26)

In ensuring good growth, development proposals will be expected to satisfy the following requirements, unless demonstrably impossible to do so:

- J. Create safe environments, which incorporates appropriate design solutions and crime prevention measures that assist in reducing crime, the fear of crime and anti-social behaviour (Chapter 14 'Creating High Quality Places');

Policy 9 (South WF Pgs 35-36)

As the priority area for regeneration and good growth, proposals will be supported where they:

- I. Deliver improvements at Lea Bridge and Bakers Arms that improve safety and incorporate Designing Out Crime and Secured by Design principles (see Policy 60 'Making Places Safer and Designing Out Crime');

Policy 30/31 (Co-Location Design Principles – pg 82)

To be supported, proposals involving co-location will need to demonstrate:

- B. Appropriate design mitigations which address the following:
 - i. Safety and security

Policy 40/41 – (Revitalisation, Adaptation and Regeneration in Designated Centres and Parades - Pg 103)

Development proposals involving the revitalisation, adaptation and regeneration of the borough's designated centres/retail parades and other non-designated areas will be encouraged where they seek to achieve the following planning objectives:

- D. Conversion of vacant upper floors of ground floor commercial buildings for housing purposes, where a high quality living environment offering good levels of residential amenity, low noise levels, safe streets and personal security can be created without impeding the development of primary town centre uses such as retail, office and leisure uses;

Policy 44/46 (Evening and Night-time Economy Uses – pg 109)

Proposals for evening and night-time economy uses that contribute to the vitality and viability of the borough's designated centres in particular, Walthamstow Town Centre will be encouraged where:

B. The design of the development particularly focuses on public safety, crime prevention and the reduction of anti-social behaviour;

Policy 45 (Shopfronts and Signage – pg 111)

Permission will be granted for new shop fronts and signs which comply with all of the following:

D. Principal entrances to upper floor accommodation avoid the rear of buildings where practicable as this can give rise to personal safety and security issues;

Policy 52/55 (Betting Shops and Payday Loan Shops - pg 130)

Proposals for new betting shops and payday loan shops will be carefully controlled in the borough. New proposals will be assessed with regard to the following factors:

D. The implications for community safety, crime and anti-social behaviour (see Policy 60 - 'Making Places Safer and Designing out Crime').

Section 14 (Creating High Quality Places - Pg 132)

Promote exemplary standards of design and place-making, and deliver the highest quality of development.

In accordance with the NPPF, development that is not well-designed will be refused, especially where it fails to reflect local design policies and guidance, and other regional and national guidance on design.

Policy 53/56 (Delivering High-Quality Design - Pgs 132)

Development proposals will be supported where they:

I. Provide appropriate safe and legible physical and visual connections that knit well into surrounding streets, routes and public realm, including, where appropriate, neighbouring development proposals;

J. Incorporate high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological value in accordance with Policy 79 'Green Infrastructure and the Natural Environment', Policy 80 ' Parks, Open Spaces and Recreation ', Policy 81 'Biodiversity and Geodiversity' and Policy 82 'Trees';

K. Provide a coherent layout and block structure with active street frontages onto the public realm;

L. Establish a clear distinction between public and private spaces;

M. Provide an appropriate amount of well-designed, suitably located and usable private and communal amenity space;

O. Facilitate inclusive, safe and accessible environments for all;

T. Maintain approved design quality from the granting of planning permission through to completion of the scheme

Policy 56/58 (Residential Space Standards – pg 139)

D. All external amenity space should be well-designed, appropriately located and usable.

The most important design factors to consider with both private and communal external amenity spaces are:

viii. Security;

x. Good levels of natural/passive surveillance;

Policy 57/59 (Amenity – pg 140)

New development should respect the amenity of existing and future occupiers, neighbours and the surrounding area by:

C. Providing sufficient facilities for the storage, collection and disposal of refuse, considering the level and type of provision, its location, and any negative impacts it may have on visual amenity, access, health and security.

Policy 62 (Promoting Sustainable Travel - pg 144)

New development will be expected to contribute to the Council's objective to deliver more attractive, accessible, healthy and safe streets, places and neighbourhoods for all residents in Waltham Forest. As such, development proposals will be supported where they:

A. Create an environment where residents and visitors actively feel welcomed and choose to walk, cycle or use public transport as part of their everyday life;

B. Contribute towards enhancing streets to meet 'Healthy Streets' indicators across the public realm in the borough;

D. Improve the quality and resilience of the public realm, ensuring accessible and adaptable public space for people and activities from all walks of life;

E. Create safe neighbourhood environments, including reducing road danger, improving personal security and meeting the Mayor of London's Transport Strategy objective for 'Vision Zero';

Policy 71/73 (Listed Buildings – pg 169)

16.15 Appropriate temporary uses will also be considered that could prevent further decay of the asset, provide improved security and allow an increased prospect of sustainable re-use. The Council may also be able to offer assistance and advice on external grant giving bodies.

Policy 78/80 (Parks Open Space and Recreation - pg 181)

Existing parks and open spaces will be preserved and enhanced and access for leisure, sporting activity and recreation across the borough will be improved by:

A. Ensuring adequate provision, protection, enhancement and quality of play and recreational spaces, indoor and outdoor sports facilities and parks for all sections and age groups of the community;

17.17 Access to high quality sports facilities, both outdoor playing fields and pitches, and indoor sports halls and swimming pools are important in developing and maintaining healthy communities. The Playing Pitch Strategy (50) acknowledging the projected rise in the borough's population over the plan period, recommends improvements to outdoor sports facilities such as improvements to pitch quality, security, floodlighting and better changing facilities.

Cycle security – pgs 226-227

1.13 There is a wide range of cycle parking racks available, and the Council does not wish to be too prescriptive. However, 'butterfly' type racks, or concrete blocks, which simply grip one or both wheels and do not allow the frame to be locked, are inadequate from a practical and security point of view and will not be acceptable. Vertical racks pose a safety hazard and are inaccessible for many users, so these will not be acceptable.

1.14 For short-term parking (e.g. outside shops, services etc.) the preferred type is the 'Sheffield' stand or a variation of it, which supports the bicycle and allows the frame and both wheels to be locked to a fixed bar. Such racks/stands should be securely fixed to the ground.

For longer term cycle parking, and where security is a particular issue, a range of cycle lockers, sheds and shelters are available which offer a greater level of security. Two-tier stands, while space efficient, are not suitable for all users and all types of cycle. They should therefore be used in conjunction with other types of stand, with signposting to more accessible stands as necessary.

Guidance on the spacing of different types of cycle parking can be found in the London Cycling Design Standards.

1.16 Cycle parking should be located as close as possible to the main entrance(s) to the building it serves without obstructing pedestrians, and easily accessible from the highway/site entrance, by dropped kerb where necessary. Cycle parking should be clearly signed, in a prominent position visible from the building and/or security lodge, well-lit and covered by natural surveillance or CCTV. Cycle parking should ideally be under cover, particularly that used for longer periods such as school/college/workplace and station parking.

1.18 For new build developments, cycle parking should be incorporated into the design of the building from the outset and not be seen as an 'add-on' at the end. New developments must overcome the barriers to cycling for their prospective residents and for visitors wherever possible. Good quality cycle parking will attract new buyers, occupiers and customers.

1.19 For residential purposes, cycle parking should be within an accessible, covered and lockable enclosure. Ideally a proportion of cycle parking should include secure lockers as a preventative measure against cycle thefts. For individual houses cycle parking could be in the form of a shed or garage. For flats or student accommodation either individual lockers or cycle stands within a lockable, covered enclosure are required. The cycle parking should be easily accessible and convenient to use.

1.20 In large developments, the cycle parking facility should be covered. Sheffield stands are usually fit for purpose for this use. Where cycle parking for staff and visitors is mentioned, the long-stay parking for staff should ideally be separate and in a more secure and covered location than that for visitors.

Car Security – pgs 230-231

1.45 Large unbroken expanses of surface parking are unattractive, represent a poor use of available land and can.

1.46 Attract anti-social behaviour. To overcome this, surface car parks should be designed with driver and pedestrian safety in mind (preferably overlooked), well-lit, suitably screened and landscaped. Appropriate Car Park Design Standards should be used. The Council will require the use of permeable/pervious paving as this helps manage run-off in extreme weather.

Motorcycle Parking Security – pg 236

One motorcycle space should be provided for every 20 car parking spaces. A minimum area of 2m x 1 m should be allowed per motorcycle. Motorcycle parking should be sited close to the entrance of a building, visible, and ideally covered by CCTV. Wherever possible, there should be a secure metal bar to which to lock motorcycles.