

Response to the Inspector Led Consultation – Metropolitan Police

Thank you for allowing the Metropolitan Police Service to make further comments in respect of the Barnet Local Plan examination.

I am grateful to the planning authority for their reference to Secured by Design (SBD) in the proposed Barnet Local Plan and to the planning inspectorate for their consideration for this element to remain as a part of the overall local plan. However, certain amendments under the 'EXAM 68' document as recommended by the independent planning inspectorate are of great concern.

In relation to document 'EXAM 53', having reviewed the notes for policy **CHW03** – this is very welcome and pre-application engagement is very beneficial in order to allow a police Designing Out Crime Officer (DOCO) to engage with applicants within the planning process in order to review the proposed scheme. This then allows the police DOCO to highlight any potential vulnerabilities from a safety and security perspective at this very early stage in order to help to design out the opportunity for crime to occur. This includes many aspects such as the design and orientation of buildings to help to increase levels of natural surveillance and to design out some elements that can increase crime and the fear of crime such as dog-legged alleyways, areas of isolation that could very easily become misused "no-go zones" for groups/gangs to loiter and so on. With priorities such as the prevention of violence against women and girls (VAWG), serious youth violence and so on, the DOCO can help advise on many different crime prevention measures from the Secured by Design (SBD) process and other proven crime prevention methods.

Secured by Design (SBD) is a police initiative to guide and encourage those engaged within the specification, design and build of all new homes (regardless of the scale of the development) and those undertaking major or minor property refurbishment, to adopt crime prevention measures. SBD advice given has been proven by independent academic research to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office. Building Control Departments in England (Part Q Security – Dwellings), Scotland (Building Standard 4.13) and Wales (Part Q Security – Dwellings) all reference SBD as a means of compliance with Building Regulations. This advice also extends to commercial premises, educational premises, medical premises as well as the wider environment such as those within the public realm.

The environmental benefits of SBD 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. It also has a significant impact on anti-social behaviour (ASB). Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor quality doors, windows and of stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards. Research documentation can be found on the SBD website (www.securedbydesign.com).

In relation to document 'EXAM 68' having reviewed the notes for policy **CDH01** (specifically Section 17, MM137, paragraph 6.6.1), I am very concerned about the wording introduced by the planning inspectors and would strongly advise that the suggested wording reverts back to that as recommended by the local planning authority for the following reasons; anti-social behaviour (ASB), crime and disorder can occur anywhere, at any time and in any place. It is not only applicable to larger scale developments. Smaller sites can often be some of the most problematic in respect of ASB, crime and disorder such as 'in-fill sites' on dilapidated garage blocks that are often blighted by ASB, rear

service roads that lack any acceptable levels of legitimate activity and natural surveillance, narrow alleyways that can generate crime and the fear of crime and so on. Examples of these smaller sites are present throughout the London Borough of Barnet. For instance, the electoral ward of Burnt Oak continues to be a focus for high levels of ASB, in particular the rear service roads behind both sides of Watling Avenue (Back Lane and Market Lane). Bakery Path in Edgware continues to be a crime generator (robbery) and focus for anti-social behaviour (street drinking, drug misuse, urination & defecation) due to its original design (dog-legged alleyway) and a police audit of the site was requested by Barnet Council's community safety team due to community concerns. Other alleyways such as those in Booth Road (Colindale – serious youth violence, ASB), The Burroughs (Hendon - crime and the fear of crime, mainly due to length and location of alleyways), Haldane Close (Friern Barnet - gang activity, crime including arson), Pennine Parade (Cricklewood – drug supply/use) are just a few examples of where the original design (with no known police designing out crime input) has led to serious problems with crime and disorder experienced by the community. Formal objections by the MPS have previously been made to some very small planning applications in Barnet such as the application to build one dwelling in East Finchley, with its only point of entry/exit being halfway along a dark and narrow unrestricted rear service road/alleyway between High Road and Fairlawn Avenue - a completely unacceptable proposal from a crime prevention perspective. Even in newer developments that have had no crime prevention input from police designing out crime officers such as Clare Court/Electra Court/Pegasus Court (outside Barnet Council offices on Bristol Avenue) are suffering from issues including anti-social behaviour and theft offences in communal areas. The local housing association has requested police assistance due to its original design and lack of Secured by Design/crime prevention measures that are now generating multiple issues for local residents. Some smaller blocks located in Barnet (such as Heracles on Grahame Park Estate – approximately 12 flats only dating to the 1970s) have no adequate crime prevention measures and these are now the subject of urgent partnership work due to the extensive issues within these communal areas including serious Class A drug supply and misuse (with discarded needles etc) directly outside of residents' front doors. The 1930s Aeroville estate (Colindale North) is a smaller estate that is also the subject of issues with ASB, crime and disorder due to the lack of crime prevention measures. Newer residential blocks such as those along Charcot Road (Colindale) also suffer with issues within the communal areas and areas such as insecure refuse stores or inadequate cycle stores. The larger developments within Beaufort Park and Colindale Gardens also suffer from multiple issues including very high levels of burglary due to the lack of Secured by Design engagement by the developer and have been the subject of subsequent police audit visits, where access was easily gained via what should be secure lobbies and residential areas. **Therefore the implementation of the Secured by Design scheme and proven crime prevention measures is essential for any development, large or small.**

To quote advice from the national crime prevention initiative, Secured by Design (SBD) residential homes development guide 2023: *"The changes to the English Planning and Building Control regulations following in-depth reviews by the Department for Levelling Up, Housing and Communities (previously: Ministry for Housing, Communities and Local Government) have underlined the importance of the police advice delivered over the past 30 years; specifically in the form of the Secured by Design (SBD) initiative. The references within the National Planning Policy Framework (NPPF) and the accompanying National Planning Practice Guidance (NPPG) along with those in Scotland (Scottish Planning Policy – PAN 77) and Wales (Planning Policy Wales – TAN 12) have sought to reinforce the need and importance of a safe and secure external environment and to this end there are specific references to police service advice and the [Police.uk](https://www.police.uk) website in particular. Indeed, the government's Chief Planning Officer Steve Quartermain, wrote to all planning authorities reminding them of the important role the planning system plays in ensuring appropriate measures are in place in relation to crime prevention and security. Further information is available at www.securedbydesign.com."*

It goes on to further mention: "The requirements and recommendations... are based upon academically sound research findings that have proven SBD to deliver significant crime reductions and cost efficiency savings for a wide range of stakeholders including local authorities, housing associations, landlords, residents and the police service. The police service continually re-evaluates the effectiveness of Secured by Design and responds to emerging crime trends and independent research findings, in conjunction with industry partners, as and when it is considered necessary and to protect the public from crime."

This advice does not differentiate between large-scale projects and smaller projects, the crime prevention approach remains the same regardless of the size of the development; it is therefore requested that the local plan for Barnet should not differentiate between the size of the project. What is the definition of a larger-scale development? This is an ambiguous paragraph and one that can be potentially exploited by developers. It is a sad but true reflection (within Barnet and beyond) of some unscrupulous developers whom will seek to "value engineer" safety and security measures on new build or refurbished developments. The police service has often seen developers undermine police advice, for example by installing non-security rated doors that have failed to keep the development safe from crime and disorder. The SBD process ensures that developers are held to account if they fail to follow police safety and security advice and would therefore fail the SBD process unless they follow the correct recommendations to comply with SBD. With the local plan requiring SBD consultation and a resultant planning condition to achieve SBD prior to occupation when deemed appropriate by the planning officer, ensures that this unacceptable process is not applied by unscrupulous developers active within the borough. Removing the ambiguity and allowing police DOCO consultation to applications of any size will undoubtedly help to prevent crime through environmental design.

There is all too often a challenge from developers to engage with Secured by Design but this process is in place to help to install levels of crime prevention and physical security to those future residents whom do not currently have a voice. Crime prevention can also assist with a whole host of different factors such as accessible and inclusive design for disabled and/or elderly people for instance. SBD continues to conduct partnership work with housing occupational therapists when designing and issuing guidance. The police service places great emphasis upon the need to build sustainable and inclusive communities and to raise awareness of the significant impact that low crime makes to the ongoing and long-term sustainability of a development.

Any adoption of the proposed amendment to the wording of policy CDH01 (EXAM 68 - Section 17, MM137, paragraph 6.6.1) concerning 'Secured by Design' only being applicable to "large scale applications" will have an extremely serious and detrimental effect to all of the efforts being made by the local planning authority, council community safety and violence reduction teams, the police service and all other key partners involved in the prevention of anti-social behaviour, crime and disorder within the London Borough of Barnet. These types of issues can destroy entire communities and it is only by this partnership approach and the adoption of professional Secured by Design and crime prevention advice in the planning, design and construction stage for developments of all sizes that we can seek to address all of the negative implications that ASB, crime and disorder can create in an urban environment.

Therefore I would urge those responsible for the approval of the Local Plan to retain the wording as originally proposed by Barnet Council local planning authority under Section 17, MM137, paragraph 6.6.1) and remove any reference to "large scale development/applications" only.

I would be happy to discuss any of the above comments further if necessary.