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Your ref: 18/AP/1604

Our ref: SE / 2932

Date: 22nd June 2018

Re: **CANADA WATER MASTERPLAN - LAND BOUNDED BY LOWER ROAD (WEST), REDRIFF ROAD (SOUTH), QUEBEC WAY (EAST), SURREY QUAYS ROAD AND CANADA WATER DOCK (NORTH), AND SITE AT ROBERTS CLOSE, LONDON SE16**

Dear Michael,

Thank you for your correspondence on the 8th June 2018 in connection with the above planning reference for:

Hybrid application seeking detailed planning permission for Phase 1 and outline planning permission for future phases, comprising:

Outline planning permission (all matters reserved) for the demolition of all existing structures and redevelopment to include a number of tall buildings (up to 162m AOD) and up to 656,200sqm (GEA) of floorspace comprising the following mix of uses: retail (Use Classes A1-A5), workspace (B1), hotel (C1), residential (C3), assisted living (C2), student accommodation, leisure (including a cinema) (D2), community facilities (including health and education uses) (D1), public toilets, nightclub, flexible events space, an energy centre, an interim and permanent petrol filling station, a primary electricity substation, a secondary entrance for Surrey Quays Rail Station, a Park Pavilion, landscaping including open spaces and public realm, works to the Canada Water Dock, car parking, means of access, associated infrastructure and highways works and demolition or retention with alterations of the Press Hall and Spine Building of the Printworks; and

Detailed planning permission for the three Plots in Phase 1:

- **Plot A1 (south of Surrey Quays Road and west of Deal Porters Way) to provide uses comprising retail (A1-A5), workspace (B1) and 186 residential units (C3) in a 6 and 34 storey building (129.4m AOD), plus a basement;**

- **Plot A2 (east of Lower Road and west of Canada Water Dock) to provide a leisure centre (D2), retail (A1-A5), and workspace (B1) in a 4, 5 and 6 storey building plus a basement.**
- **Plot K1 (east of Roberts Close) to provide 84 residential units (C3) in a 5 and 6 storey building.**

Each plot with associated car parking, cycle parking, landscaping, public realm, plant and other relevant works.

I am encouraged to see that the page 266 of the Design and Access Statement for Phase 1 Plot A1, and page 200 of the Design and Access Statement for Plot A2 both refer to Secured By Design. I met with QCIC on 18th August 2017 about Phase 1, and overall Secured By Design requirements and standards were discussed. Detailed minutes were agreed at the time between both parties. I am encouraged to see that Crime Prevention Through Environmental Design and Secured By Design are integral components of this masterplan development. Follow-up meetings are to be arranged throughout the development, for each phase and plot.

Key principles of Secured By Design are to be incorporated for this superscale development. This includes adhering to the requirement of compartmentalisation for security, and keeping the various uses for this development separate. The use of tested and accredited products in the name of the fabricator namely doorsets, windows, and gates is essential, as is access control, CCTV where required, secure cycle stores and bin stores, and secure perimeter treatments.

Overall, I feel that the development could achieve the security requirements of Secured By Design, as long as it installs security rated products and upscales the security on any bespoke products. Achieving Secured By Design should be welcomed, especially as it is in a high crime area. **Southwark is currently the 3rd highest London Borough in respect of crime**, suffering from incidents of Burglary, Robbery, Assaults, Criminal Damage, Motor Vehicle Crime, Theft and Anti-Social Behaviour including drugs. Rotherhithe Ward has had **2276 recorded crimes** in the year May 2017 to April 2018, detailed crime figures are shown here <https://www.police.uk/metropolitan/E05000549/crime/stats/>

It is also important to note that policies relating to the design and layout of a new development, which aim to reduce crime and disorder, remain unaffected use. It is also especially important, given the guidance within NPPF paragraphs 58 and 69 which state:-

Paragraph 58 of National Planning Policy Framework clearly states that local and neighbourhood policy should 'create safe and accessible environments where the fear of crime does not undermine quality of life or community cohesion.'

Paragraph 69 of this document 'promoting Healthy Communities' underlines this statement by encouraging the planning system to play an important part in facilitating 'safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'

Policy 3.14 of Southwark Planning Policy 2007, as saved during the 2013 review, states 'Designing out crime is the process whereby streetscape, open spaces, buildings and transport infrastructure are positively influenced by practical design solutions to reduce the occurrence of crime and provide a safer and more attractive urban environment. Small changes such as creating well-lit, overlooked spaces, can significantly reduce opportunities to commit crime as well as fear of crime... Implementing this policy will contribute to the LPA meeting its obligations under Section 17 of the Crime and Disorder Act 1998 and Circular

5/94 Planning Out Crime. PPS1 (paragraph 37) states that in planning for high quality and inclusive design, local authorities should have regard to good practice guides e.g. Safer Places – The Planning System and Crime Prevention (ODPM/Home Office), Feb 2004.’

As stated previously, I feel that should this application proceed, it should be able to achieve the security requirements of Secured by Design. This will require the guidance of **Secured By Design Homes 2016 and Secured By Design Commercial 2015 guides**. This is alongside continued consultation throughout the design and build of this development with the South East Designing Out Crime Office to ensure that Secured by Design standards are implemented correctly. I feel that the adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment.

Whilst I accept that with the introduction of **Approved Document Q** of the Building Regulations from 1st October 2015 it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards, I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject area.

That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website www.securedbydesign.com .

This development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards, I would seek to have a condition stating, ‘The development must adhere to the principles and physical security requirements of Secured By Design’ attached to any permission that may be granted in connection with this application. For larger developments such as this, I would seek for this to be a two-part condition, pre-commencement works and pre-occupation.

I feel that the benefits of certified products should be pointed out to applicants and that the Local Authority encourages applicants to achieve this more appropriate standard. It is also important to note that policies relating to the design and layout of a new development, which aim to reduce crime and disorder, remain unaffected.

I trust these comments are of assistance and I request to be kept informed as to the status of this development.

Yours Sincerely,

Laura Flux - Designing Out Crime Officer

SE DOCO Team - Metropolitan Police Service