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Your ref: 19/AP/1203

Our ref: SE / 3801

Date: 31<sup>st</sup> May 2019

**Re: 39B CONSORT ROAD, LONDON, SE15 2AA**

Dear Lasma,

Thank you for your correspondence on the 31<sup>st</sup> May 2019 in connection with planning application reference 19/AP/1203 for: **Demolition of some of the existing buildings together with retention and restoration of the former workshop (the eastern most building) to be converted into commercial space. Construction of four part two, part three storey 3-bedroom family homes, and a four storey building to provide six new flats (2 x 1-bedroom, 3 x 2-bedroom and 1x 3-bedroom units). Construction of a part one, part two storey commercial building, to provide an overall total of 349 sqm of flexible A1, A2, B1, D1 and D2 floor space together with associated landscaping, refuse stores and cycle parking.**

Unfortunately I cannot find any mention to security or Secured By Design in the Design and Access Statement or Planning Statement for this development. There has been no contact made by the architects or developers for this proposal with the Designing Out Crime Unit. Therefore, security layout, requirements, and products have not been discussed.

This development should readily achieve Secure By Design with the use of tested and accredited products with third party certification, mainly for doorsets, windows and glazing. From looking at the plans, the separation between residential and commercial units has been achieved, including separate bin stores and cycle stores.

It is important that all bin stores and cycle stores, including that of the commercial units, are secured so that only those with authorisation can gain access. I would recommend relocating the residential cycle store so it is closer to the residential block and therefore better surveyed. I would also recommend moving the commercial cycle storage to a more overlooked location rather than where it is currently located, more shielded from view. Cycle stores require an increased level of security due to the high volume of cycle theft in Southwark (1600 cycles reported stolen per year, and only 1 in 4 thefts are reported). Each cycle store must have a tested and accredited doorset and CCTV within the stores.

The layout of the residential units looks well thought out, with a secure groundfloor lobby for the flat block, and private amenity space for the houses. The boundary treatment for these private amenity spaces will need to comply with Secured By Design standards. The other thing to note is that there needs to be a defined boundary on the rooftops of the residential properties, and the skylights must be tested and accredited products, to prevent burglary and trespassing.

Overall, I feel that the development could achieve the security requirements of Secured By Design. Achieving Secured By Design should be welcomed, especially as it is in a high crime area. Southwark is a high crime borough, suffering from incidents of Burglary, Robbery, Assaults including violent crime and knife crime, Criminal Damage, Motor Vehicle Crime, Theft, gang crime, and Anti-Social Behaviour including drugs. Nunhead and Queen's Road Ward has had **2015 recorded crimes** in the year April 2018 to March 2019, detailed crime figures are shown here <https://www.police.uk/metropolitan/00BEGP/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 sections 8 and 12 which state:-

**Section 8 of National Planning Policy Framework** 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 of National Planning Policy Framework** 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.'

**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 the **Secured By Design Homes 2019 and Commercial 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.

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.

I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application. 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](http://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. I would seek for this to be a two-part condition: pre-commencement of 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