



Victoria Lewis
Team Leader
Chief Executive's Department
Planning division
Development management (5th floor - hub 2)
PO Box 64529
LONDON SE1P 5LX

PY - Bromley Borough
PR - Bromley Police Station
Bromley Police Station
High Street
Bromley
BR1 1ER
Telephone: 0208 2848889
Facsimile:
Email:laura.r.flux@met.police.uk
Your ref: 17/AP/4797

Our ref: SE / 3153

Date: 12th February 2018

Re: BURGESS BUSINESS PARK, PARKHOUSE STREET, LONDON, SE5 7TJ

Dear Victoria,

Thank you for your correspondence on the 2nd February 2018 in connection with the above planning reference for: **Demolition of the existing buildings and redevelopment of the site to provide 505 residential units, up to 3375 sqm (GIA) of Class B1 commercial floorspace, up to 117 sqm (GIA) of Class D2 leisure floorspace and up to 570 sqm (GIA) of Class A1-A3 floorspace (retail / financial and professional services / cafe / restaurant) within 13 blocks of between 3-14 storeys (max AOD height 50.74m) with basement, car and cycle parking and associated hard and soft landscaping.**

I am encouraged to see that mention has been made to Secured By Design on page 141 of the Design and Access Statement. Designing Out Crime Officer PC Mark O'Callaghan met with Natalia Santarelli from HTA Design on 11th December 2017 to discuss Secured By Design for this development. We still await meeting minutes, for amendment and confirmation of the meeting. A summary of the meeting has been outlined in the Design and Access Statement.

This development will require security compartmentalisation as more than 25 units will be served off each core. Access control will be enabled throughout the development. For compartmentalisation, each groundfloor will be access controlled. It is preferred that each residential floor will have a secure lobby which will also be on access control, for residents and visitors. Lobbying each floor would be better for controlling access and for security onto the communal decks and podiums. Overriding this access control system in the event of a fire was also discussed, and the applicants must take direction from Building Control. The proposed strategy to be adopted for compartmentalisation will be discussed in more detail at a later meeting.

All ground floor, and 'easily accessible' (within 3.5 metres), doors and windows will need to be tested and accredited products without any retrofitting. The doors and windows on the podium and deck levels will also require to be to a security rated tested and accredited standard. All residential floors, and doors leading into the fabric of buildings, required to be to a security rated tested and accredited standard. Residential properties will have defensible

space where necessary, in order to clearly define public and private spaces. Internal access to the basement level will require access control fobs.

The notes make reference to Secured By Design mailboxes, and that CCTV is required to cover the mailboxes, undercroft parking areas, and inside cycle stores. I would require for the cycle stores to be divided to accommodate small numbers, of up to 70 bikes maximum in each store. The doorsets to cycle stores must be to a tested and accredited standard. Cycle stores require a high level of security due to the high level of cycle crime in Southwark (1603 reported cycle thefts between October 2016 and September 2017).

The residential and commercial uses are to be kept completely independent of one another, and access control and security tested and accredited doorsets will be utilised to enable this. Direction to use the Secured By Design Commercial 2015 guide was given for the shell and core development of the commercial uses. Requirement of security tested and accredited doors and windows was discussed, and direction was given regarding Chapter 51 for curtain walling requirements.

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 8th 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. Brunswick Ward has had **1371 recorded crimes** in the year January 2017 to December 2017, detailed crime figures are shown here <https://www.police.uk/metropolitan/E05000543/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 guide, and reference to Secured By Design Commercial 2015 guide**. 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 follow the principles and physical security requirements of Secured By Design' attached to any permission that may be granted in connection with this application.

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