

From: Smith, Vic 14410 [REDACTED]
Sent: 14 February 2023 14:07
To: Town Planning
Subject: 2022/3796 Oatlands Drive

 External email >

Dear Ms Adamson

Re: Development of 2 detached blocks comprising 33 flats with new vehicular access, associated parking, cycle storage, refuse storage and amenity areas with hard and soft landscaping, and associated engineering and infrastructure works, following demolition of existing houses.

At: 16 – 18 Oatlands Drive Weybridge Surrey KT13 9JL

Thank you for the opportunity to respond to this application. Planning guidance states that local planning authorities will need to consider whether there are planning policy reasons to engage other consultees who – whilst not designated in law – are likely to have an interest in a proposed development (non-statutory consultees). Local planning authorities need to identify the particular types of development or areas in which non-statutory consultees have an interest, so that any consultation can be directed appropriately, and unnecessary consultation avoided.

On behalf of the **Police and Crime Commissioner**, the role of the Designing Out Crime Officer (DOCO) is to observe, recommend and provide justification for the recommendations: to scrutinise planning proposals for security and safety issues in relation to crime, potential crime and the ‘fear of crime’. The DOCO’s role in interpreting plans is to identify security issues and provide appropriate security advice. Features that are required to be built into the design as principles of Crime Prevention Through Environmental Design (CPTED) include: access control, natural surveillance, defensible space, the environmental quality (of the landscape and buildings) and physical protection.

These recommendations can contribute to the overall aim of the National Planning Policy Framework and help to support the ‘presumption in favour of sustainable development,’ considering the security of the built environment, for those that live and work in it and the services it provides.

Elmbridge Core Strategy CS17 (Local Character, Density and Design) states that ‘New buildings should be physically integrated into the community through safe permeable access routes which minimise opportunities for crime’ and that the ‘Design and Character SPD will look at how development can be built in accordance with Secured by Design principles’.

*This is a compact residential development within an existing residential landscape close to retail and transport facilities. The general crime situation is one of low-level acquisitive crime and antisocial behaviour, but includes thefts from and damage to parked vehicles at an increasing rate. Inadequate levels of parking places an additional burden on parking within the immediate area of new developments. This has the potential to cause frustration, conflict and antisocial behaviour as it provides the catalyst for criminal damage and neighbour disputes. Since **April 2019 to date** there have been a relatively low number (**55**) of vehicle-related crime incidents. Residential burglaries are also experienced and in the same time frame a high number (**116**) of residential burglaries have been reported within the local KT13 9** community. Entry is invariably gained by either smashing glazing or forcing open easily accessible rear doors and windows of houses without adequate physical security. Sheds and garages are also a target for the theft of bicycles*

(although a low 15 – some burglaries involved the theft of cycles), gardening and power tools. Apartment accommodation can be particularly vulnerable. These crime patterns and trends can all be addressed by encompassing the recommendations of Secured by Design (SbD).

The layout provides an element of natural surveillance across the development from active rooms and increased use of the new environment but attention to detail is required to ensure that the landscaping does not provide somewhere for offenders to hide or contribute to any ‘fear of crime’. As mentioned in the Design and Access Statement this can be achieved through the use of appropriate lighting to enhance the safety of residents, deter criminality and antisocial behaviour and reduce opportunities that might create any ‘fear of crime’. Potential CCTV and lighting need to be considered as integral to the overall scheme. Appropriate compartmentalisation through the use of access control systems is required to reduce unauthorised access into and within the building; stairwell and lift lobbies for example.

- As the buildings comprise three or more floors an access control system should be installed.
- The method of postal delivery will need to be considered, as ‘Trades buttons’ are not recommended.
- The communal doors and apartment doors should be to recognised certificated security standards i.e. PAS24:2022 as a minimum to also include laminated glazing if not to an LPS or similar standard. As the main modus operandi to force entry is to simply smash safety glazing in doors and windows, all ground floor windows should include laminate glazing.
- Gates or fences should be installed as close to the building lines as possible to remove easy access to the rear of the blocks or around the blocks forming the development.
- Consideration should be given to securing the basement parking areas with a gate or shutter, as these areas have proven vulnerable to theft locally.

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. The inclusion of proven physical security and informed landscaping will ensure that the development does not attract further criminality within the new or the existing community. In this way, it can be shown that the development is safe, secure and sustainable; and will have little or no impact on the local community.

There is no charge for applying for the Secured by Design award. Secured by Design products will satisfy and exceed Approved Document Q (ADQ) requirements (see below).

- To support the assessment of these aims I request consideration of a planning condition to demonstrate through accreditation that the development achieves the principles of Secured by Design.
- An early meeting with the developers will ensure the aims of SBD can be met.

Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. Crime for these purposes includes terrorism.

Good design that considers security as an intrinsic part of a masterplan or individual development can help achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience. However, good security is not only about physical measures and design; it requires risks and mitigation to be considered in a holistic way.

National Planning Policy Framework (updated July 2021)

2. Achieving sustainable development

- At paragraph 8: A social objective – ‘to support strong, vibrant and healthy communities...by fostering well-designed beautiful and safe places’.

8. Promoting healthy and safe communities

- At paragraph 92: Promote social interaction – including ‘street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages’; and ‘are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion’.
- At paragraph 97: Planning policies and decisions should promote public safety and take into account wider security and defence requirements...This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security;’

9. Promoting sustainable transport

- At paragraph 104 (e) ‘patterns of movement, streets, parking and other transport considerations are integral to the design of scheme, and contribute to making high quality places’.
- At paragraph 106 (d) ‘provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking’.
- At paragraph 112 (c) ‘create places that are safe, secure and attractive – which minimise the scope to conflict between pedestrians, cyclists and vehicles...’

12. Achieving well-designed places

- At paragraph 130 (f) 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.

Approved Document Q (ADQ) states that the building must be designed and constructed in such a way that it adequately resists: unauthorised access from outside the building and: unauthorised access from within the building to flats within the building. This applies to all new homes, extensions to homes and dwellings; external doors, windows and roof lights; doors to individual flats; communal entrance doorsets; and garage doors where there is an interconnecting door within the garage. Annex B provides the specification for ‘bespoke’ timber doors.

- There is a technical difference between the security requirements of ADQ and Secured by Design. The former seeks ‘tested’ products, whilst the latter is assessed on ‘certificated’ products.
- Please note that it must be the fabricators who provide evidence of certification – not the systems companies. Buyers should be notified of this requirement.
- Products sourced from SbD licensed companies via the website can only be from the accredited range.

Secured by Design does not necessarily hold evidence of independent third party certification for these products in relation to its Fire Performance, although dual-certification is becoming more available. We strongly advise that such evidence is obtained from the manufacturer to ensure suitability to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department

for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire. BS 7273 fire protection standards will also be applicable.

There are now three levels for Secured by Design Homes. The Gold Award is for new developments or refurbishment schemes that achieve compliance with Section 1, together with the requirements of Section 2a and relevant Section 3 requirements. Secured by Design Silver Award is for those developments that achieve the requirements of Section 2a. The Silver Award can also be achieved by bespoke developments that achieve Section 1, 2b and relevant Section 3 requirements. The Bronze Award is for bespoke developments that achieve Section 2b only.

Full details can be found at www.securedbydesign.com

Best Regards

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