

From: Christie, Angela 13227 [REDACTED]
Sent: 20 June 2023 08:31
To: Town Planning
Subject: Planning Application ref: 2022/3525

Follow Up Flag: Follow up
Flag Status: Flagged

 External email >

Planning Application ref: 2022/3525
The Molesey Venture Sundial House Orchard Lane East Molesey Surrey KT8 0BN
FAO: Jack Trendall Case Officer Elmbridge Borough Council
16/06/2023

Dear Mr Trendall

Proposal: Development comprising 3 detached buildings containing 74 residential units with underground and surface level car and cycle parking, mechanical plant, soft and hard landscaping and associated diversion of Thames Water pipe following demolition of existing buildings.

At: The Molesey Venture Sundial House Orchard Lane East Molesey Surrey KT8 0BN

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.

To support the 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.

The National Model Design Code states:

P.3.i Secured by Design

144. Neighbourhoods need to be designed to make all people feel safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design.

145. Insecure places can disproportionately affect some of the groups with protected characteristics. Local authorities will need to take this into account when devising and implementing design principles, having

regard to the Public Sector Equality Duty, under the Equality Act 2010, which includes the need to have due regard to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act.

The superseded Design and Access Statement mentions at 6.9 the aim to achieve Secured by Design. I note that this has been dropped from the current Design and Access Statement. I would therefore like the opportunity to add the following:

- 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.
- **CONDITION:** Prior to any above-ground works, details of full 'Secured By Design' Accreditation shall be submitted and approved in writing by the Local Planning Authority. The details shall demonstrate consultation with Surrey Police Designing Out Crime Officers and that each building or part of a building can achieve accreditation. The development shall only be carried out in accordance with the approved details and maintained thereafter.
- **CONDITION:** Prior to the first occupation of each building or part of a building or use, a 'Secured By Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.
- **REASON:** To ensure safe and secure development and contribute to reducing crime, in accordance with the Elmbridge Local Plan, the Emerging Local Plan and the NPPF.
- An early meeting with the developers will ensure the aims of SBD can be met.

The residential proposal is set 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 MAY 2020 to May 2023 there have been a relatively low number (30) of vehicle-related crime incidents. Residential burglaries are also experienced and in the same time frame (33) of residential burglaries have been reported within the local KT8 0** 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, 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).

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'. This can be achieved through the use of appropriate lighting to enhance the safety of residents, deter criminality, 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 use of access control systems is required to reduce unauthorised access into and within the building; stairwell and lobbies for example.

- The communal doors and apartment doors should be to a recognised certificated security standard i.e. LPS 1175 issue 7.2.2014 SR2+ / PAS24:2022 / LPS 2081 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 and easily accessible windows should also include laminate glazing. Indeed, single points of entry such as front, back and side doors should be certificated security standard i.e. LPS 1175 issue 7.2.2014 SR2 / PAS24:2022.
- As the residential blocks are over 2 storeys access control will be required, along with visitor door entry systems. Access control from communal spaces will need to be considered in relation to Building A. Security compartmentation of developments incorporating 26 or more flats, apartments, bedsits or bedrooms should be considered to prevent unrestricted access to all areas and floors of the building. Either

lift and stairwell access controlled separately or lift and stairwell access jointly controlled via an additional secure doorset.

- The method of postal delivery will need to be considered, as 'Trades buttons' are not recommended.
- Where there is the provision for underground parking this should incorporate the use of access control to all vehicular and pedestrian entrances to an appropriate rated/certificated level to prevent unauthorised access into the underground parking.
- Provision of cycle storage – cycle storage should be robust and secure as cycle theft continues to be an issue. Bicycle parking facilities should be incorporated into any existing access control and monitoring systems.

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).

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 & Smoke Performance, although triple-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

Angela Christie

North Division Designing Out Crime Officer , Surrey Police

Postal Address PO Box 101 Guildford Surrey GU1 9PE

Tel: 01483 631632



Visit the "Secured by Design" website for DOCO contact details, design guides, licence holders and application forms: www.securedbydesign.com

The content of this email is OFFICIAL

DOCO 13227 CHRISTIE

Northern Division

Surrey Police





Click [here](#) to report this email as spam.