Sara Chiong

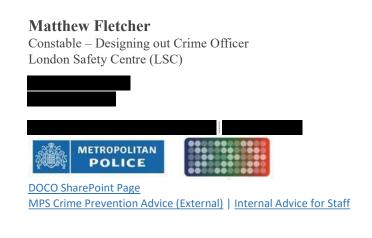|	
From:	██████████████████
Sent:	19 September 2024 09:36
To:	Local Plan
Subject:	Draft Submission Local Plan Reg 19 June 2024 DOCO response
Attachments:	Newham Draft Local Plan June 2024 DOCO response.pdf

Follow Up Flag:	Follow up
Flag Status:	Flagged

Dear Local Plan representatives,

Please find attached our response to the Draft Local Plan Reg 19 June 2024 with our representations. If there is anything you wish clarity on from my response, please contact me to discuss.

Regards,

Matt

Matthew Fletcher
Constable – Designing out Crime Officer
London Safety Centre (LSC)

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METROPOLITAN POLICE

DOCO SharePoint Page
MPS Crime Prevention Advice (External) | Internal Advice for Staff

Newham Planning Control

Designing Out Crime Office

Email: ███████████████████

Dated: 19/09/24

Re: Draft Newham Local Plan – June 2024

Dear Newham Planning,

Thank you for allowing us to comment on the above planning proposal. We have noted the Borough's plans (between 2019 to 2029) for Newham to include 47,600 new homes and a minimum of 425,000 square metres of industrial and commercial floor space. We currently work in the Metropolitan Police Service Unit of Designing Out Crime Officers (DOCOs). Our unit administers the MOPAC 'Secured by Design' (SBD) scheme. Our Team currently work in the North East Division, of which Newham is one of the 9 Boroughs that we cover. **This follows on from our response provided on 23/01/23 and we have the below further comments:**

1)   We are supportive of Policy D1, but would still recommend that Policy D1, Section 3 (page 48) is reworded to include specific mention of other Policing Units that do not necessarily administer the SBD Scheme but are nonetheless vital for overall safety and security.

Whilst we are supportive of the requirements for sites to achieve SBD accreditation, we would request that the mention of the Silver award is removed and only mentions accreditation. This helps to remove the difficulties that sites with Heritage aspects can have in achieving Certification (as they may only be able to attain Bronze) and helps to encourage sites wherever possible to try and attain Gold (rather than immediately going for Silver).

We would recommend wording as follows:

"Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings via early and ongoing engagement with the Metropolitan Police Designing out Crime Officers (DOCOs), Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP)."

2)   We are supportive that in the Policy Implementation section D1 (page 52) it links early engagement and discussion to MPS Units: *"Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure). Secured by Design accreditation for the physical security features for buildings will be expected for all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). Developments should aim to achieve Silver Award level. Early engagement with the Metropolitan Police Service is encouraged to ensure the proposal can meet this level of accreditation."*

As per point 1, our recommendations regarding the removal of just mentioning the Silver award would also be recommended for this section.

3)   We are supportive of Policy W4: Utilities and Digital Connectivity Infrastructure section 6c where it states "*Major development proposals (including those within employment areas) must improve digital connectivity by… Undertaking effective engagement with Counter Terrorism Security Advisors at the pre-application stage to ensure security is appropriately considered.*"

4)   We would recommend any Policies that propose changes/improvements to the below areas also reference early engagement with the CTSAs:

- **Crowded Places**
- **Transport Infrastructure**
- **Class A Licenses Premises**
- **Utilities**
- **Storage of Hazardous Materials**
- **Iconic Buildings and;**
- **Tall Buildings**

An example would be Policy HS2: Managing new and existing town and local centres (pages 124-125) where this could be referenced in the Policy itself Section 9 (page 125) or within the Implementation Section HS2.9 (page 134).

5)   We are supportive in Policy D2: Public Realm Net Gain Section 1d (page 54) that mentions the need to "*Promote a feeling of safety through good design for all times of day and night.*"

We support the need for good wayfinding and connectivity; but would urge caution in designs creating excessive permeability that can create robbery hotspots, multiple escape points for offenders and reduce overall natural and active surveillance by reducing the number of people using each route. Wide, visually open and straight routes are encouraged in design to help ensure that people have the earliest opportunity to assess how safe a route feels.

6)   We would recommend that in Policy D2: Public Realm Net Gain Section 1d that where it states "*CCTV, should be included only where necessary*", it also includes immediate reference to the comments in the Planning Obligations where it states "*Security and safety contributions identified as a requirement via consultation with the Newham Community Safety Team and/or the Metropolitan Police Service and where linked to the nature of the development may be required.*"

7)   It is recommended that Policy H9 Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living (page 251) that are approved are also required to meet the SBD requirements as per Policy D1. This is to ensure physical measures alongside the proposed Management Plans mentioned in H9.1 (page 253) will ensure the best safety for all users of the development.

8)   Where Car Clubs are mentioned in Policy T2 (page 351) section 2c, it is worth confirming that these will be within the public realm to avoid non-residents potentially having access into private car parking areas which can be a major source of Crime and ASB.

9)   We are supportive of Policy T3: Transport Behaviour Change (page 356) section 4a that ensures "Storage should be safe, secure, well lit, clean and prominent" and allows for measures to comply with this to be "in line with, or higher than, London Plan standards".

Following further technical advice, it is recommended that within sections 5 and 6 or as an addendum the following is noted in relation to Electric Vehicle Charging Points:

"Where developments may require the charging and storage of Lithium-ion powered vehicles or devices, the developer or developer's agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified."

10)   We would still recommended that in the Glossary and Abbreviations (pages 573-588), Designing Out Crime Officers (DOCOs) and Secured by Design (SBD) are included to ensure that there is no confusion as to what these roles are and how to contact them as per Policy D1 requirements. Our unit would be willing to help write these if required, but more information can be found at www.securedbydesign.com.

11)   Any separate comments from the MPS Estates Management Team should be given due consideration and be read alongside the comments provided in this response.

Thank you again for seeking our opinion in relation to this important document. If you require any clarification of any of the comments made, please do not hesitate to contact us at the above address.

Yours sincerely,

Matthew Fletcher 2098CO
Designing Out Crime Officer
Metropolitan Police Service

Draft Submission Local Plan (Regulation 19 June 2024)

Vision and Objectives page 22

4. Safer Newham where no-one feels at risk of harm

Crime and fear of crime will be reduced and safe spaces and streets will be created through better, more inclusive, design of the public realm, including green and open spaces.

Policy D1: Design Standards page 48

1. All developments should have regard to the Newham Characterisation Study (2024) and any further, relevant Council-led design guidance and/or code and apply all of the following qualities of good design where applicable:

a. Create welcoming buildings and spaces that are well integrated socially, ecologically and physically into their neighbourhoods. Avoid creating isolated and disconnected places that are not easy to move through and around.

c. In public realm and communal spaces, ensure clear sight lines and visual permeability to help feelings of safety, legibility and wayfinding.

f. Promote a sense of enclosure and definition that supports the role of the public and communal space(s).

g. Provide natural surveillance for public and communal spaces through overlooking from neighbouring buildings and/or activities taking place within the space.

3. Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings (Silver award).

4. Temporary buildings that are likely to be used for three years or more (including years already in use) should be designed to a high standard, with particular attention to enabling accessibility, promoting active travel, providing high quality landscaping, and mitigating amenity impacts.

5. The quality of design should be clearly demonstrated at application stage. Major developments fitting the terms of reference of the Newham Design Review Panel should be assessed by the panel and any community and/or youth design review panel appointed by the Local Planning Authority.

Policies Implementation page 52

D1.3 When developing the scheme's design, careful consideration should be given to security features so that they do not onerously impact on opportunities for creating quality public realm, including seating, shelter and greenery which contribute to the promotion of healthy, active lifestyles and social integration.

Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure). Secured by Design accreditation for the physical security features for buildings will be expected

for all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). Developments should aim to achieve Silver Award level. Early engagement with the Metropolitan Police Service is encouraged to ensure the proposal can meet this level of accreditation.

Policy D2: Public Realm Net Gain page 48

1. All new and refurbished public realm should be designed, managed and maintained to fulfil all of the below criteria:

d. Promote a feeling of safety through good design for all times of day and night. Surveillance solutions, such as CCTV, should be included only where necessary.

Policies Implementation pages 59-63

D.2.1 The arrangement of buildings and other features within a development should be organised so that inclusivity and safety are promoted from the outset of the design process. Design can have a significant impact of creating environments that discourage crime and help people to feel safe. Design solutions should be optimised first and foremost before any additional security interventions are considered. Features of good design that promote safety and comfort include: imbedding the knowledge gained through local engagement (particularly with focus on under-represented groups such as women, young people, and people with disabilities); designing for multi-group activation (i.e. welcoming to and usable by a range of different demographics); good permeability and connectivity (i.e. creating choice of routes, while avoiding unnecessary connections such as back alleys); clear sight lines along key routes; adequate enclosure and natural surveillance from neighbouring buildings; and good quality context-sensitive lighting.

The British Standards Institute's BS 5489-1:2020 'Code of practice for the design of road lighting – Part 1 Lighting of roads and public amenity areas' should be considered.

Early engagement with London Borough of Newham Community Safety Team and the Metropolitan Police Service in relation to major schemes will identify known safety concerns in relation to the site, and any need for security infrastructure. Where CCTV is proposed, a Data Protection Impact Assessment should be undertaken and form part of the site's Public Realm Management Plan (see Part 5 of this policy).

Art installations (including murals): should be directed to town and local centres, along other sections of major roads that demonstrate high footfall, and in the setting of cultural or physical heritage (including known archaeological assets). Opportunities for public art in open spaces should be considered at an early stage to ensure that it is satisfactorily integrated into the design of development and applicants should work with artists and consult the local community at an early stage of design. Where possible, artists should be local to or have a connection to Newham or to East London. These should be designed and positioned so as not to obstruct pedestrian or cycle movements, and to make a positive contribution to the character of the local area, including recognition of local cultural or built heritage assets. Where works of public art are sited in the public realm, their appropriate maintenance must be secured in perpetuity.

Creative/interactive public lighting: should be prioritised in town and local centres, along major roads with high footfall (including underpasses and bridges), along public rights of way (including along waterways) and in the setting of cultural or physical heritage where it would protect and enhance its significance. The interactive/creative lighting should ensure it complements and broadly retains lighting uniformity, coverage and consistency for longer distances/routes.

As and when any conflicts arise from the set of guidance, priority should be given to addressing inclusivity and accessibility (which includes consideration of feeling safe), while also recognising and balancing the different, sometimes conflicting needs of a range of people.

The document also references the Public Realm Design Guide for Hostile Vehicle Mitigation, National Protective Security Authoirty for HVM considerations.

Policy D5: Shopfronts and advertising page 86

1. Shopfronts and signage incorporated within frontages should be designed in a way that maintains active frontages and that meets all of the following criteria as relevant to the proposal:

c. Principally retains visual permeability through the ground floor shopfront by minimising signage and carefully addressing the visual impact of security measures, louvers, shutters and any integrated plant equipment.

f. Inset entrances on shopfronts are transparently glazed and well-lit.

Implementation Policies page 87-88

D5.1 Required security measures should be designed to limit their visual impact on shopfronts, and where possible should be internal. Where shutters are necessary, they should be perforated to enable visibility into the shop and passive surveillance. On new developments, internal shutters are preferable, and shutter boxes should be designed in from the outset to avoid them being added retrospectively.

To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. At least 50% of the shopfront glazing, and preferably a higher percentage for the doorway(s), should retain transparency during hours of operation. Any shutters used during closing times should also retain a good level of visibility into the unit (e.g. use of perforated shutters). The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.

Policy D6: Neighbourliness page 90

1. All development is expected to achieve good neighbourliness from the outset by avoiding negative, and maximising positive, social and environmental impacts of its design and function on neighbours on and off the site. This includes a requirement to:

a. create a safe and secure environment by reducing the likelihood of antisocial behaviour, promoting public safety (including road safety), improving security and lessening the fear of crime;

Implementation Policies pages 91-92

D6.1 Early consideration of neighbourliness matters will be encouraged through pre-application advice/design review, and as part of masterplanning of large sites where detailed designs will be addressed at a later stage.

Development has the potential to positively or adversely affect the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes should improve accessibility for those with disabilities by reducing glare and excessive contrast. Lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security, and this should be balanced with the need to avoid light spillage onto urban green spaces to protect biodiversity. Well-designed lighting schemes on commercial properties can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.

The temporary impact of construction works on perceptions of safety will also be important to address through the design of hoardings and the construction and logistics management plan.

Policy HS2: Managing new and existing town and local centres pages 124-125

1. All development within the borough's town and local centres should meet all the below criteria as proportionate to the type and scale of development proposed:

d. Provide attractive, active frontages, and accessible and safe access.

f. Be well managed and maintained.

3. Within town and local centres, development proposing the shared use of a space or a building by multiple uses/businesses engaged in main town centre uses is encouraged, including on upper floors, subject to all the following:

b. Active frontages, and particularly shopfronts, are retained.

9. In line with public realm net gain principles of Local Plan Policy D2, developments in town and local centres should demonstrate how their proposals help achieve all of the below, as relevant to the scale and context of the development:

a. An accessible, comfortable, greener, safe and well maintained public realm at all times of the day and night.

b. Improved connectivity with and accessibility from neighbourhoods within the centre's catchment;

Implementation Policies page 134

HS2.9 The principles and objectives of public realm net gain are set out in Local Plan Policy D2. Pavements should be generous and designed to comfortably and safely manage high footfall levels, and include enlarged pavement for 'spill-out' space in front of clusters of food and drink leisure or cultural uses or community facilities such as libraries. Providing at least one small local square is encouraged along pedestrian-busy major roads, and could include meeting/gathering points, areas of respite or play, and potential for outdoor meanwhile uses such as markets or local cultural events. The Newham Characterisation Study (2024) Chapter 9 Borough-wide Design Principles includes further design recommendations (primarily under section 9.2.1 Provide local uses that support 15minute neighbourhoods).

Wayfinding and digital infrastructure (such as USB charging points and Wifi hotspots) incorporated into the public realm of centres is encouraged, and should ensure these are located and designed for safe access during the day and at night, with particular attention to designing for comfortable use by women and girls.

Early engagement should take place with the Council's Highways, Public Realm Management, and Regeneration teams to help identify opportunities where correlating designs or pooling resources would add value to planned public sector investment in the public realm of the respective centre.

Policy H9: Houses in multiple occupation and large-scale purpose-built shared living page 251

1. Developments for houses in multiple occupation and large-scale purpose-built shared living developments should include a detailed and resourced residential management plan.

Implementation Policies page 253

Residential management plans should contain:
- management practices that minimise safeguarding risks; and
- opportunities for residents to create and sustain social networks; and
- measures that will minimise the housing's amenity impacts; and
- security and fire safety procedures.

Policy T2: Local transport page 351

1. Development should support a network of well-connected neighbourhoods, improve air quality, maximise health benefits, improve accessibility, reduce carbon emissions and deliver sustainable growth. This will be achieved through:

2. Major development should provide or contribute towards:

a. Wayfinding in the local area, including through contributions towards Legible London. Large scale development, as well as sites delivering their own streets or multiple blocks of housing should also deliver high quality wayfinding on site.

c. Car clubs, providing an appropriate number of car club parking bays, taking into account the scale of development, existing local car club bays and local parking demand.

Implementation Policies pages 353-354

T2.1 Developments should seek to reduce barriers to movement, benefiting pedestrians and cyclists in particular. Large buildings and development sites can also act as barriers, so masterplanning should consider optimal routes to, from and around sites. Developments should demonstrate that sites are accessible for all residents, with pavements free of trip hazards/obstructions. Immediate access to a site should also be considered, with the provision of dropped kerbs at junctions or removal of pavement parking.

T2.2 The Council's emerging Car Club Strategy and the Sustainable Transport Strategy outlines the preferred approach towards car clubs. Applicants should work in partnership with London Borough of Newham, Transport for London and car club providers to understand the proposed level of car club bays and level of contributions required. This should take into account the scale of development, existing local car club bays and local parking demand. Car club parking bays should be accessible to members of the public, not restricted to certain occupiers or residents of a development.

Policy T3 – Transport behaviour change page 356

4. All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan standards) and should meet the following requirements, as relevant:

a. Storage should be safe, secure, well lit, clean and prominent.

Implementation Policies pages 360-361

T3.3 Or where including parking inside podium structures, in a basement or otherwise inside a building, it should:
- Be capable of changing and evolving over time,
- Ensure that car parking cannot block or hinder access to sustainable transport storage,
- Ensure that access to/from parking is easy and clear,

- In larger parking structures, consider use of supergraphics and other wayfinding signage elements,
- Use high quality lighting and consider of blind spots,
- Provide CCTV for security.

T3.4 Cycle parking should meet London Cycle Design Standards. The Sustainable Transport Strategy outlines that a minimum of five per cent of cycle parking should be dedicated to larger non-standard cycle parking. This larger non-standard cycle parking should preferably be provided in the same location as standard cycle parking. It should accommodate a range of non-standard cycles, through provision of sufficient space to park and manoeuvre and step-free access.

Where standard parking is provided in the form of Sheffield Stands, the end stands can be dedicated to non-standard cycles if there is sufficient space at either side. Other stand options could include ground anchors or lower and extended Sheffield Stands. All larger non-standard cycle parking should be clearly labelled to state that it is dedicated to larger non-standard cycles only.

Applicants should demonstrate in a Design and Access Statement that they have considered the following to ensure delivery of high quality sustainable transport storage:
- Who will use the storage – residents, shoppers, employees, children etc,
- Security of the storage, and how it's accessed,
- Consideration of routes to and from the storage– to the street, interior of the building and other facilities,
- Avoiding sharp corners that a larger non-standard bike would be unable to use,
- Consideration of ease of use for all, including older people, children and disabled people,
- High quality lighting and consideration of blind spots,
- Clear, obvious signage,
- In larger parking structures, consideration of supergraphics and other wayfinding signage elements,
- Potential provision of ancillary equipment – such as a manual air pump, stand and basic tools,
- Provision of CCTV for security,
- Accessibility for all mobility options,
- Where applicable, location and access to sufficient supporting facilities including lockers and showers, with this located close by.

Policy W4: Utilities and Digital Connectivity Infrastructure page 382

6. Major development proposals (including those within employment areas) must improve digital connectivity by:

c. supporting digital connectivity infrastructure projects. Undertaking effective engagement with Counter Terrorism Security Advisors at the pre-application stage to ensure security is appropriately considered.

Implementation Policy Pages 384-385

W4.6 The provision of high quality digital infrastructure and communications infrastructure is an essential component of modern neighbourhoods and the delivery of sustainable and inclusive growth in Newham. Proposals must improve digital connectivity and should focus on affordability, security, sufficiency of power and resilience to ensure provision of digital infrastructure meets the current and future needs of Newham and London.

Further guidance on planning for digital infrastructure will be set out in the emerging Greater London Authority's sub-regional Digital Strategy and Digital Connectivity Infrastructure London Plan Guidance.

Applicants must proactively engage with Counter Terrorism Security Advisors of the Metropolitan Police at the pre-application stage to ensure security is appropriately considered at the earliest opportunity. Contact information of a Counter Terrorism Security Advisors can be found on Police.UK.

Appendix 2: Current National and Local Policy

The National Planning Policy Framework (NPPF)

Section 8 - "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 - "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"

The London Plan 2021

Policy D11 Safety, security and resilience to emergency states

B - Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

C - Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

3.11.3 - Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police. Further guidance is provided by the Government on security design. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

3.11.4 - By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Newham Local Plan 2018

Core Policy SP3 Quality Urban Design within Places

2a - Any new development, town centres, public spaces, transport hubs and streets should incorporate the principles of and achieve Secured By Design (SBD) accreditation; and

b - Designs should be accompanied by sufficient technical and financial detail to demonstrate that a satisfactory design quality will be realised and sustained, including provision for continuity of the project architect to completion stage, and details of proposed public realm and open space management and maintenance.

Section 17 of the Crime and Disorder Act 1988

"It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in its area", as clarified by PINS953.