

**Re: - Enfield New Local Plan**

Dear Planning Team

Thank you for providing the Metropolitan Police Service (MPS) with the opportunity to comment on the Enfield Draft Local Plan. This response is following on from my previous letter on 14th February 2019. You will be aware that the MPS also responded to your previous consultation on 28th February 2019, drafted by Lambeth, Smith and Hampton on our behalf. That response related to policing infrastructure and use of Section 106 funds. This response will again solely refer to **Crime Prevention and Designing out Crime, through our delivery of the National Police Service Secured by Design scheme**. You may receive responses from other areas of our organisation, where the draft plan interacts with that particular area of business.

We have some specific observations on sections of the draft plan and also some further observations in relation to the Secured by Design scheme. We hope you find our comments useful. However, if you have any issues or queries please don't hesitate to contact us.

Safe Urban areas & Health and Wellbeing:

The MPS is supportive of the multiple references throughout the plan, which express the desire to achieve **safe** urban environments and communities. In reference to Town Centres, (SP TC1) it is stated that Urban environments **"are safe and accessible to all, and which promote health and wellbeing of the population"**. Regarding the safe environment, but also health and wellbeing, the MPS and the Secured by Design scheme can play a huge role in this. Research has consistently shown that crime, the fear of crime and health are related (Crossman & Rader, 2011; McKee & Milner, 2000; Stiles et al., 2003; Whitley & Prince, 2005).

CL4 – Promoting sporting excellence (12.4.4), T1 – Sustainable transport (13.15) and SS2 – Making good spaces, all also make good references to safe spaces and security. Indeed SS2 at 2.4.10, mentions schools, community centers and workplaces, which are 'safe and secure' including for the elderly, children and those with health conditions or impairment.

Placemaking areas:

The MPS notes the detail in the 10 proposed place making areas, particularly that these places have been prepared in the context of the NPPF and the London Plan. For Angel Edmonton, (Para 3.4.7) the crime concerns have been referenced with a clear willingness to address these issues through 'good design'. The MPS would like to see greater reference of this willingness to ensure **ALL** the 10 proposed place making areas are addressed with good design and indeed with the support of MPS Designing Out Crime officers and the Secured by Design Scheme. This is not reflected within Chapter 3 and would like to draw attention to two areas of the new London Plan;

London Plan Policy D11: Safety, Security and Resilience to Emergency

Paragraph 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.... 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.*

Paragraph 3.11.4

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.

Strategic Policy SP DE1:

The MPS welcome the reference to Secured by Design on major developments and would like to see further encouragement for applicants to engage with the MPS designing out crime team at the earliest opportunity. The MPS has failed to achieve Secured by Design conditions (with no design conflict) on recent major developments and so its reference here is welcomed. A secured by design condition will ensure that within those 10 placemaking areas, the commitment to safe communities will be realised.

We do have a concern however regarding the layout used within the document as shown in the text box below. It does not allow for easy viewing of the statement and would like to see it with its own numerical title and separated from the interactive maps wording.

7.1.4 The high-level outputs from stages 1 and 2 of the assessment can be seen in **Figure 7.1** and in the accompanying Character of Growth study. Interactive maps of the outputs of the study are also available to view in more detail at <https://new.enfield.gov.uk/services/planning/evidence-base/>. The Council will consult the Metropolitan Police on all applications involving major development. In areas with high crime rates, achieving secured by design certification may be required as a condition of planning consent. Where a conflict exists between secured by design principles and other urban design objectives, applicants must explain their reasoning behind the compromises made in their design and access statement

We would also like to see the wording adjusted to read: *'The Council will consult the Metropolitan Police on all applications involving major development. In areas with high crime rates, achieving Secured by Design certification may be required as a condition of planning consent. Applicants should consult with the Metropolitan Police designing out crime officers at the earliest opportunity and include details of security and secured by design compliance on the Design and Access statement. Where a conflict exists between Secured by Design principles and other urban design objectives, applicants must explain their reasoning behind the compromises made in their design and access statement.'*

In this regard due consideration should be paid to Section 17 of the Crime and Disorder Act 1998 which places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Embedding Secure by Design principles fits fully with this obligation and the benefits of the scheme are summarised here;

The Secured by Design scheme has proven results in reducing crime and the fear of crime, with up to 87% reduction in Burglary and 25% reduction in criminal damage on new build projects, and 61% in major refurbishment projects (2009). The scheme is also successful at reducing anti-social behaviour, through a raft of measures including robust communal door standards, access control and careful design / layout of new homes. High crime can be a factor in why people move home and in Enfield, where a higher than average proportion of residents receive Housing Benefit, security improvements may well be outside their budget. This will place residents at greater risk of repeat victimisation and is in no way sustainable.

The Secured by Design scheme can deliver safe and sustainable homes and businesses through a range of techniques in crime prevention, including utilising independently tested products proven to resist attack and misuse.

Thank you again for the opportunity to comment on this plan. The MPS Designing Out Crime Team strive to ensure that new developments across London reach the highest possible security standards, mainly through partnership working with the relevant Planning Departments and requesting conditions to comply with Secured by Design. By including a requirement in your core planning strategy that major new schemes will require Secured by Design accreditation, after proper consultation with Designing out Crime Officers, we are better placed to deliver secure developments across the London Borough of Enfield.

I would finally like to reference one final section of the London Plan when considering our comments above.

London Plan: Policy D11: Section 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.

The MPS have a dedicated Designing out Crime Officer for Enfield, Pc Les Gipps, who can be contacted on the email address above.

Yours sincerely