

Appendix 2 - Responses to SPD consultation

Safer Built Environments

No	Name	Comment	Response
EXTERNAL			
Home Builders Federation Ltd			
1		The HBF does not have any formal comments.	Noted
2		As a personal observation, I wonder whether such guidance might not lead to the creation of standardised and bland environments. The stuff about planting, and avoiding 'thick' foliage and foliage below 2 metres on trees, seems very unfortunate (important as carbon sinks, reducing the heat island effect but more especially for good old aesthetic reasons) and I wonder whether we're not in danger letting the 'politics of fear' and our fears about personal safety, spoil our lives?	Accept - Paragraph 6.1 amended to read: Landscape design plays an important role in creating an attractive and welcoming environment and should be considered from the outset of any design as an integral component of any scheme. Planted areas can provide a comfortable external environment for all to enjoy as well as aiding in the creation and definition of useable spaces and the interface between private and public realm.
GLA			
		GLA has no comments.	Noted
English Heritage London Region			
3		The policies included within the SPD do not reflect those assessed in the SA.	Accept – Error corrected and amendments made to ensure each contains a consistent list of policies.
4		Para should be inserted that makes reference to the careful consideration of the heritage assets and the wider historic environment when developing interventions for a safer environment.	Accept - Paragraph 2.1 amended to read: 'The design of safer environments needs to respond to the local context to provide clear pedestrian and vehicular connections and a simple layout of buildings with the aim of improving natural surveillance and clearly defining public and private space. A mix

			of uses can generate activity and a well maintained public realm can increase a perception of safety. Care needs to be taken to ensure that when developing interventions for a safer environment to avoid harm to the special qualities of heritage assets, their setting and the wider historic environment....'
5		Should refer to PPG15	Accept - Reference to PPG: 15 added to list of polices in Section 2
	Russ Curlew, Building Design Consultant		
6		Considers the document adequate for its purpose.	Noted
	Brixton Market Traders Federation		
7		Shop awnings should be removed or made smaller in areas of high crime where good CCTV coverage is needed	Not Accepted - Traditional awnings often contribute to the character of shopping areas and have an important functional role. They are usually retracted after shops close. In practice this suggestion would not be practicable either as crime rates can vary. A direct relationship between crime incidences and awnings would have to be established.
	Mr D Hart – Local Resident		
8		Need to emphasise compliance with DDA. For instance removing obstacles on street pavements	Not Accepted - this is not within the remit of this SPD.
	Area Crime Reduction Officer & Counter Terrorism Security Advisor, Met Police (London Underground)		
		No comments.	Noted
	INTERNAL		
	Community Safety Partnership, Environment, Culture & Community Safety		
9		Reference to the Safer Places, Secured by Design and	Not Accepted - References are made in all sections of the

		CABE Space are applauded, there needs to be reference made throughout the document to these documents and the appropriate level of minimum standards we require.	document to guidance documents e.g. Safer Documents and Secured By Design. Balance to be struck between ease of use and technical information, with links to further information and contacts provided at the end of the SPD. Additionally the SPD is based on information drawn from these documents.
10		Para 3.5, talks about pedestrian and cyclist routes, but fails to reference cycle parking, and linking in with a transport strategy and green agenda re sustainable transport. Pathways and routes lead to shops and businesses, areas where people congregate and these areas should be considered at the planning stage.	<p>Partial Acceptance - reference to the provision of secure cycle storage included in section 3.5 as follows:</p> <p><i>"..... In order to encourage cycle use it is essential to provide secure cycle storage that is accessible, well surveyed and at a convenient locations for users. "</i></p> <p>Linking into the transport strategy does not fall within the remit of the document.</p> <p>Sections 3 & 4 already note the need to connections between places.</p>
11		Section 4 could have more information and make cross reference to other documents and polices. 4.1 and 4.2 makes reference to 'a clear definition between ... public and ... private' areas and that 'rear gardens should back onto rear gardens'; there are reasons given why this should be and no reference to any other sources of information. I would like to see reference to secured by design in this section.	Not Accepted - No need for additional references in as these are provided at the beginning and end of the document. The layout of the document aims at reducing duplication and repetition.
12		Section 5 (5.5) makes a bland statement about lighting levels being consistent and an intensity appropriate to the area; while this works well within the street scene it is not the same for public areas, parks and children's play areas. Clarity needs to be given to the planner/designer/developer re the requirement to reduce Anti Social Behaviour and the impact the built environment can have on crime and disorder. Lighting is a critical component and should be planned in consultation with a qualified CPDA and Lighting Engineer.	<p>Accept - LB Lambeth has to install lighting to the required National and European standards.</p> <p>"Lighting requirements differ depending on their location and the individual use of spaces and as such standard approaches may not be appropriate. Advice should be sought from the Police Crime Prevention Design Advisor and a qualified Lighting Engineer at an early stage and a lighting strategy should form an integral part of the overall design. All new lighting proposals should be compliant with the relevant British & where appropriate European Standards."</p>

13		Section 6 (6.6) 'side and rear boundaries' should note that walls, fences and railings need to reduce the chances of a crime taking place and should not encourage social gatherings near the curtilage of properties.	Accept - Paragraph 6.6 has been amended to ensure a balance is struck between strongly defining interface between public and private space and reducing the fear of and incidence of crime. It now reads as follows: "The use of negative design measures such as razor and barbed wire should be minimised. Materials should be vandal resistant and higher quality materials that last longer will help reflect a positive image of well maintained buildings and spaces. The design of side and rear boundaries should not result in spaces and layouts that encourage unwanted social gatherings that would increase the fear of or incidence of crime."
14		The Document needs to point to key experts and advisers throughout in order to offer guidance without compiling a large and unreadable policy.	Not Accepted - this is provided in-depth within section 8 of the document. The layout of the document aims at minimising repetition.
15		I like the checklist near the back of the document and feel that there should be more technical information and signpost towards the relevant specialist.	Not Accepted - a balance needs to be established between making the document readable and a reasonable size and containing sufficient technical information. Links are provided to sources of further information and specialist advisors.
		Crime Prevention Design Advisor, LB Lambeth Police Division	
16		More emphasis within the Document placed on the National "Secured by Design" scheme	Accept - the SPD already contains a significant number of references to Safer Places produced by ODPM/Home Office (paragraphs 2.1, 3.4, 3.5, 4.3, 4.5, 5.3, 5.4 & 6.5). Secured by Design references have been included throughout the document and a specific section has been created in Section 2 outlining the Secured by Design scheme.
17		Lambeth should reinforce the need for applicants to include within their Design and Access statement some detail regarding how they have addressed Safety and Security considerations throughout their design proposal.	Accept - Paragraph 2.2 added: 'When preparing the accompanying Design & Access Statement for planning applications clear reference should be made as to how safety and security concerns have been addressed as part of

			the design process and with specific reference to the guidance provided within this SPD.'
18		Stronger emphasis placed on the Home Office approved "Secured by Design" Crime Prevention Initiative run by ACPO and the specific "minimum Standards"	Accept - a specific section has been created in Section 2 outlining the Secured by Design scheme.
19		Stronger emphasis within the guidance stressing the importance in consulting the Police Crime Prevention Design Advisor at the earliest possible design stage	Accept - Paragraph 1.4 added: This SPD should be used during pre-application discussion and negotiation of proposals. Early consultation with all relevant stakeholders during the design process is important and applicants should make contact with the Police Crime Prevention Design Advisor who will be able to provide detailed input into the Secured by Design initiative and measures to enhance safety and security and to reduce the fear of and incidence of crime.
20		We would also have liked to see a direct reference at this point to the Website or even the direct Internet link to enable easy access to the relevant information rather than at the back of the document in other references.	Not Accepted - This would result in repeated references throughout the document and the document would become overly biased and dominated by this one initiative. The link/reference is included in a dedicated section with all other references/contacts.
		Cllr Jackie Meldrum	
21		One of the difficulties in connection with gated properties where officers have difficulty in accessing either mail boxes or, indeed, the properties themselves. The SPD should reflect UDP Policy 32 and discourage gated development for this reason.	Accept – the following text has been inserted into para 4.4: - "Gated developments should be avoided as they result in hostile public environments and reduce permeability."

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