



London Borough of Haringey
Planning and Building Control
6th Floor River Park House
225 High Road
Wood Green
N22 8HQ

Your ref: HGY/2024/1456

Designing Out Crime Office
Bow Road Police Station
111-117 Bow Road
Tower Hamlets
E3 2AN

Telephone: 0208 217 3813
Email: lee.j.warwick@met.police.uk

Dated: 15/08/2024

Planning Case Officer : Gareth Prosser

Our ref: NE 8270

Re: Planning Application at:

30-48 Lawrence Road, Tottenham, London, N15 4EG

Proposal:

Alterations and extension to existing building (Class E) and erection of residential building (Class C3) including ground floor commercial (Class E), cycle and car parking, hard and soft landscaping, and all other associated works

Dear Haringey Planning,

Section 1 - Introduction:

Thank you for allowing us to comment on the above planning proposal.

With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.

It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).

We have not met with the original project Architects but it has been demonstrated within the Design and Access statement that they intend to follow Secured by Design Guidelines. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early stage.

Metropolitan Police Service Designing out Crime Group do not provide a consultation service solely for the purposes of meeting the BREEAM Security Needs Assessment. However, the Metropolitan Police Service Designing out Crime Group can assist the developer to achieve the relevant BREEAM credit for Safety and Security via an application for Secured by Design accreditation (SBD). A signed and dated SBD Commercial application form should be emailed to the above email address. Please note full submissions should be accompanied with full product details – to include all door and window specifications etc.

At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

To ensure that Secured by Design can be achieved, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects and developer ensure that the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.

The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative:

In light of the information provided, we request the following Conditions and Informative:

Conditions:

- A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve **'Secured by Design' Accreditation**. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development.

The development shall only be carried out in accordance with the approved details.

- B. Prior to the first occupation of each building, or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

Reason: In the interest of creating safer, sustainable communities.

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

Note - Separate applications and subsequent certificates will be required for both residential and commercial elements of the developments

Section 3 - Conclusion:

We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decision Notice**, with attention drawn to any changes within the development and any subsequent condition that has been implemented with crime prevention, security and community safety in mind.

Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.

Yours sincerely,

Lee Warwick 1977CO

Designing Out Crime Officer
Metropolitan Police Service

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

Appendix 1: Concerns and Comments

In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised when reviewing the application plans and the location of the development.

Note - That the pre-application phase concentrated on the design of the layout of the development, the following also provides the material aspect of the physical target hardening requirements to achieve Secured by Design accreditation and this has not been discussed in detail with the architects or developers.

Boundary Treatment	
Gating	Designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment or minimum of 2.1-2.4 metres. Note if the gating is within an undercroft then the full gap from floor to ceiling is to be infilled with either gating (depending on vehicle height) or gate to prevent unauthorised entry over the top.
Recess	Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm.
Anti- Climb	If anti-climbing measures are introduced then signage should be used to comply with occupiers liability Act 1984.
Fencing Type	Any boundary treatments should be UKAS certified as recommended by a DOCO
Low Height boundaries	All low defensive wall/railings to be designed to deter sitting, loitering and climbing.

Access Control	
Communal Entrance	All communal entrances should include a primary and secondary secure line and be developed in conjunction with any access control system and strategy.
Communal Door Accreditation	All communal entrance door set/s are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SRB or Equivalent certification *Communal door/s should be self-closing, self-locking single doors*

Doorset Preferred Locking Mechanism	Magnetic locks (Communal areas) - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom.
Access Control	Access control is required to maintain compartmentation in communal areas. All panels to have audio/visual capability.
Access Panel	Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293.
Trades Button	No Trades Button on control panel
Audio/Visual Entry (Camera)	DDA (Part M) compliant camera alone is insufficient for first entry door. Primary camera location on access control panel to be considered to capture all visitors. Secondary camera will be required to the side/height that provides the resident a clear image of the visitor.
Data Retention Fob Access	Data retention of access control activations should be utilised throughout the site with the facility to store data for one calendar month before over writing. This data should be available to Police within 24 hours for evidential purposes should it be required. *Consideration to be given to appropriate and sufficient hard drive storage*
Integrated (Part B/ ADQ) Compliance	Access control systems should be Integrated to utilise both fire and security systems.
Emergency Release (Push To Exit)	Primary egress routes that are required to have an emergency escape mechanism, then these are to be self-resetting, shrouded and in best practice, alarmed.
PAS 24 Compliance	All PAS 24, UKAS certified door sets and windows are required to have a non-removable identifying label as set out in current SbD Homes guide.
Plant Room/ Service Rooms	All service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * Service/plant door/s should be self-closing, self-locking single doors*
Internet Of Things (IoT)	Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT.

ACB (Access Control Box) / Fire Access - Apartment Entrance

Access Control Box (ACB)	Situated within 2m of the main entry door (externally) at a height of at least 2.100m or above. An external fire over ride switch (FOS) should protected with the use of an accredited security product such
---------------------------------	--

	as a Gerda Box. Consideration to other suppliers of this type of fire switch protection method should be given, check SbD web site. In addition to the use of an ACB see below re Premises Information Box (PIB). https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/access-control-box-(acb).aspx
Premises Information Box (PIB)	Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance).
DropKey Protection Box(DPB)	If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made. The project fire consultant should be made aware of any Part B Security v's Safety conflicts https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx

Doors	
Recessed Areas	Any recesses should not exceed 600mm, but consideration can be given to the Disability Discrimination Act (DDA) requirements. Be advised further by borough occupational therapist.
External Communal Door Set/s	All communal entrance door set/s are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO (as per B2): LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SRB or Equivalent certification *Communal door/s should be self-closing, self-locking single doors*
Secondary Lobby door	Any Internal Communal Access Door/s that provided a safety and security aspect are required to be dual certified to the following minimum standards: PAS24:2016 (Subject to crime risk assessment) Part B Fire resistance must be taken into Consideration for the door.
Accessible Doors Apartment and Townhouses	All accessible Residential Doors are required to be the following UKAS certified minimum standard: PAS24:2016 This includes sliding and bi-fold door sets not designated as the primary access/egress routes.
Street Opening Front Doors	Flat/Duplex/House front doors to meet a minimum standard of PAS24:2016 and ideally have a split spindle handle mechanism (requires key to gain access from outside of property) with internal thumb turn.
Residential Door Fittings	The security door viewer should be integral to the product specification. Awareness to DDA requirements for height and

	number of door viewers.
	The door chain or opening limiter should be affixed to the door set framing not cosmetic architrave.
	Any mail delivery letter plate with-in a PAS24:2016 door set should be compliant to TS008 and where possible incorporate an anti-fish cowl.
Locks	All locks are to be part of the accredited PAS24:2016 specification.

Postal Strategy

Internal Lobby and Certified Through The Wall System	Due to crimes associated with letter plate apertures, such as Arson, Hate Crime, Lock Manipulation & fishing, Secured by Design strongly recommends where possible, mail delivery via a secured lobby, letter box TS009. It would be advised that all post is delivered into an airlock (preferred) or through the wall to reduce the likelihood of tailgating and postal theft. Through the wall letter plates should incorporate a sloping chute and anti-fishing attributes to mitigate against mail theft and meet TS008 standard. If post is to be delivered into an airlock then these should be securely surface mounted and meet TS009 standard.
MPS Mailbox Specification	TO COMPLY WITH DEFINITION OF ROBUST REQUIREMENTS • A minimum of 1.5mm thick galvanized steel construction. Its depth and width must allow mail to fall below the fishing plate unrestricted. • Fitted with a 3-point locking mechanism supported with a minimum five pin cam lock. • BS EN 1303:2005 (Inc corrigendum Aug 2009) compliant five/six pin camlock must have anti-drill, anti-bump and anti-pick lock attributes. • Gap restricting aperture (anti-fishing max 260mmx40mm) The anti-fishing plate must be fabricated as part of the post box construction and extend into and across the full length of the letterbox opening to defend against the interference of mail, anti-leverage surrounding trim, welded claw on retrieval door to negate the ability to gain a leverage point and compromise the security of the mailbox.

Windows

Accessible Windows & Roof Lights	All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either: *PAS24:2016 with BS EN356:2000 min. P2A glazing (consider P3A) *STS204 Issue 6:2016, *STS202 Issue 7:2016 Burglary Rating 1 *LPS1175 Issue 7.2:2014 Security Rating 1 or
---	--

	*LPS1175 Issue 8:2018 A1 Security Rating 1 or *LPS 2081 Issue 1.1:2016 Security Rating A. Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)
Glazed Apertures	All glazing in and adjacent to:
	*Residential, communal, front, back doors and ground floor windows
	*Communal windows that are easily accessible above ground floor level
	Should incorporate security glazing to the equal standard of the agreed door specification.
Lockable Window Handles	Any window within 2m of an accessible surface should have key operated locks. Where windows form an escape route, Part B (Fire) compliance should be adhered to. All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access.
Curtain Walling	Where curtain walling systems are proposed they should be certificated to either: *LPS1175 SR2 *BS EN1627 RC3. (With minimum of BS EN356:2000.P4A Glazing) *PAS24:2016 Curtain wall systems are non-structural cladding systems for the external walls of buildings. Typically curtain wall systems comprise a lightweight aluminium frame onto which glazed or opaque infill panels can be fixed. These infill panels are often described as 'glazing' whether or not they are made of glass.
Compartmentation	
Access Control Layers	Access control layers apply to both residents via fob and visitors via controlled access
	Meet and Greet is NOT an option
	Southern block Communal Entrance – • Layer one - Into main lobby reception at front entrance – Fob and A/V control for visitors • Layer Two- lobby door to lifts and stair cores with fob and AV or Audio control for visitors, this will also control lift destination to each floor • Stair core - fob only on ground floor with push to exit, fob only onto the residential threshold from stairs Norther block communal entrance – • Layer one – Gated entrance for both commercial and residential – Fob for residents and A/V control for visitors for both and commercial and residential • Layer Two - lobby door to lifts and stair cores with fob and AV or Audio control for visitors, separate control Audio control panel to control lift destination to each floor • Stair core - fob only on ground floor with push to exit, fob only

	onto the residential threshold from stairs Vehicle Gate entrance – Audio/Visual access control for visitors and fob access for residents (no induction plate to be used) All resident access doors (refuse, bikes) to be fob access only
CCTV	CCTV can be used to support access control measures where access is gained into communal areas such as the rear garden and the front entrance

Refuse Stores

Building Access	Ideally should not allow access into the building from the refuse store. If such access is required then door to be fob both ways an minimum of PAS24:2022
Street Access	Door/s (single leaf where at all possible) into stores from street should be either • LPS1175 SR2 or • STS202 BR2/B3 Note - Single leaf doors are available up to approx. 1500mm and will facilitate 1100cc bins in LPS and STS. This will eliminate the weakness of the passive leaf manually operated locking system which leaves double doors more vulnerable.
Doors	Single leaf, self-closing and self-locking with access control, ideally using magnetic locks to the previous documented standard. (2 x 500kg resistance (1200lbs/psi) positioned 1/3 from the top and 1/3 from bottom).
louvre	If louvre doors are used, these should be of robust construction (ideally steel) supported with a layer of steel mesh to the rear to prevent unauthorised access to the locking mechanism and prevent general misuse.
Lighting	A suitable level of lighting to be present within refuse store, ideally low level at times of inactivity and full level illumination when in use. To compliment any CCTV. External lighting to be Dusk to Dawn covering door set.
Signage	No signage to be erected externally which would provide opportunity for other building users or passers-by to dump their rubbish or fly tipping.
Water Supply	Any water supply, should be protected from misuse. This can be either by a lockable housing or a Lock shield bib-cock tap.
Positioning & Materials	Positioning - Consideration be given to position of external store as not to create hiding places, climbing points or assist general misuse. Attention should be given to fire risk.
CCTV	Where at all possible CCTV should be present (Consideration should be given to location of camera/s and how internal elements may restrict coverage)

Cycle Stores

External Cycle and Bulk Storage	Positioned as not to provide climbing aids to other vulnerable areas such as accessible window/s, door/s, balconies, flat roofs and podiums.
Public Realm Access Doors	Street access doors, to be either: LPS1175 SR2/B3 (issue 8) or STS202 BR2 or LPS 2081 B Rating. Must be single leaf, self-closing and self-locking with access control ideally using magnetic locks.
Cycle Storage Lighting	Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected.
Signage	No signage to be erected externally which would provide opportunity for offenders to identify cycle storage.
Bicycle Registry Management	Access to the cycle store should be prohibited. Only residents or users that register (name, address etc.) that information should be given access to the storage facility.
CCTV	CCTV must be installed in cycle stores. Should have unhindered views of the racking at all times and should be vandal resistant.
Locking Points	There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
Viewing Panel	Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set).
Internal Signage	Ideally signage should be placed inside the store to reinforce importance of securing cycles by residents.

J - Roof Access

AOV	AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access.
Hatch & Ladder/s	Any Hatch should be secured with a minimum of Sold Secure Gold padlock. Fixed Ladders should be avoided as they will require mitigation measures. Any access should be facilitated by the maintenance team own equipment.
Roof Lights	Easily accessible roof lights should be a one of the following standards: • PAS24:2016 or • STS 204 (issue 6: 2016) or • LPS1175 (issue 7: 2014) SR1 or

	• LPS1175 (issue 8: 2018) SR1 / A1 or • STS202 (issue 7: 2016) BR1 or • LPS2081 (issue 1.1: 2016) SR A
Roof Door Access	If door access is required for “maintenance only” the door should be PAS24:2016 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only.

Balconies / Terraces & Door Canopies

Balconies	Enclosures to balconies at all levels should be designed to exclude handholds and to eliminate the opportunity for climbing up, down or across between balconies. If a free standing/bolt on balcony system is to be used, consideration must be given to the risk posed by climbing. To prevent this the design should incorporating physical obstructions to frustrate the climber.
Raised Planters	Raised planters should be designed to avoid space beneath to store items such as drugs or weapons and so they do not provide climbing aids to vulnerable areas or balconies
Door Canopies	Where possible, door canopies should be free standing and offer no means of climbing. They also should be of lightweight construction that would not support a person if climbed. If canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A.

Lighting

Public Realm lighting	Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard.
Declaration of Conformity	Should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance.
Internal lighting	Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected)
Lux levels	Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below: • Office interior (security) 05 Lux • Private car parks 10 Lux • Exterior Rural location 10 Lux • Exterior Urban location 20 Lux • Walkways 30 Lux • Loading bays 50 Lux Further guidance is available in the “Lighting against crime” manual.

Uniformity (Uo)	The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following: • Values of between 0.25 and 0.40 • Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index. • Good lighting will use energy efficient lamps in suitable luminaries.
Dusk-Till-Dawn Lighting	Lighting, where possible should consist of white light which is evenly distributed In Communal areas: • All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically. On Residential units: • All residential entrances (front, back, side doors) should also have dusk till dawn lighting, via a photo electric cell with a manual override. Allowing residents/the user local control.
Bollard lighting	Shall be avoided due to its history of vandalism and ease covering. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination.
Directional lighting	Can be used to support pedestrian routes. Should robust and vandal resistant and be part of an overall lighting strategy (as shown above) Directional lighting should not be a standalone solution to illumination.

Climbing Points

Rain Water Pipes	External rain water pipes should be square/rectangular, flush to the wall or recessed – if round they should be shrouded up to 3m minimum from ground level and have close/flush fitting brackets.
Balcony to Balcony vulnerabilities	Consideration should also be given for opportunities to climb balcony to balcony both up and across Balustrade should be secured to the floor of the balcony and flush to the front removing any vulnerable grip points.
Balconies and adjacent features	Consider vulnerability of balconies by boundary walls along with • Trees. • Door canopies. • Street furniture. • Neighbouring properties. • ACB and utility meters. • Any outbuildings such as cycle and refuse store. • Vehicles in parking areas.

Utility Meters

Utility Meters	All utility meters should be positioned where possible in external risers or cupboards removing the requirement for an official to enter the building to read them. Smart meters should be the default requirement for all developments.
-----------------------	---

Management Plan	If utility meter is to be located within residential unit representatives must have a scheduled appointment made with the concierge or Management Company to gain access to the building.
------------------------	---

Car Parking	
Location	Positioned as close as possible to buildings and overlooked by active windows. Should not be located close to boundary walls allowing vehicles to be used to climb into properties.
Lighting	Should be well lit to the latest standard of BS5489 (consider Park Mark guidance) https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf
C.C.T.V	All car park areas should be covered by CCTV.

Alarm / C.C.T.V	
Alarm Consideration	If an alarm is to be installed it should meet BS EN 50131 (as minimum) which can include wireless systems. If an alarm is not fitted installers should provide a labelled 13amp fused spur on consumer unit for future use. https://www.policesecuritysystems.com/
CCTV Installation	Please note where a development requires CCTV, this facility is to compliment other security measures, not to replace them. As a minimum police recommend coverage of the following areas: • Entrance & exit points including secondary coverage of call points, • Foyer / Lobby areas, • Post boxes and Postal rooms, • Cycle stores,
	• Refuse stores, • Underground or covered parking areas, • Top of stair cores
	Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site specific risk assessment.
	Homes 2019 (55.3.7) requests the system conforms to BS EN 62676: 2014 - video surveillance systems - and where applicable BS7958: 2015 CCTV management and operation codes of practice (COP) as outlined by the requirements of the Information Commissioner's Office.
Quality	Should be of good facial recognition and colour HD quality in both daylight and night vision.
Housing &	CCTV housing to be anti-vandal and potentially shrouded. Signage

Signage	highlighting use of CCTV should displayed throughout the development.
Storage & Access	Footage should be preserved for a minimum of 31 days.
	Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office.
	To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2016 door or SR1 lockable steel cabinet.
	Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.

Party Walling

Communal to Apartment Walling Preferred System	Light weight framed walls either side of a secure door set (including 600mm around the whole door set) and partitioned walls between two dwellings or communal space shall meet the requirements below: • LPS1175 (Issue 7.2) SR1 • LPS1175 (Issue 8) SR1/A1 • STS202 Issue 7 BR1
Apartment to Apartment Party Walling Alternative	All avenues must be explored to meet the standards above, however the following are potential alternatives if the above cannot be achieved. To be agreed by DOCO. • E-WT-2 Timber Wall • E-WS-3 Light Steel Wall • E-WM-20 Masonry Wall Installation of 9mm (min) timber sheathing or expanding metal in the areas concerned. Wherever possible C-Studs should have 300mm staggered centres.

Public Realm & Landscaping

Permeability	Routes for pedestrians, cyclists and vehicles must be open, direct and not unnecessarily separated from one another.
	Footpaths should not run to the rear of, and or provide access to gardens, rear yards or dwellings. If this is the case further mitigation will need to be discussed with the DOCO.

Communal Areas	Communal areas such as playgrounds, seating or amenity areas should be designed to allow natural surveillance from nearby dwellings with safe routes for users to come and go. • Located to allow natural surveillance from nearby dwellings. • Clear signage stating age restrictions for specific areas and equipment (i.e. under 5's). • Ideally be fully enclosed with 1.2m open top railings or planting, to prevent casual users. • Should be a single dedicated entrance/exit point to enable parent/guardian supervision • Dedicated entrance/exit point to be gated with self-closer. • Ideally designed to be secured at night, if so boundary heights to be raised. • Vandal resistant equipment to be installed. • Historically playgrounds located at the rear of dwellings create ASB flashpoints and where possible should be avoided. • Lighting needs to be a consideration. 24/7 lighting implies a suggestion of use out of hours (Site specific)
Landscaping Scheme	A full landscaping scheme plan should be submitted and discussed with the DOCO.
Sight lines	Bushes and shrubs maximum 1m high.
	Trees should a canopy height of 2m minimum and maintained to allow clear sight lines.
	Landscaping and trees, should be designed to complement CCTV or lighting plans with long term maturity a consideration.
Defensive Planting	Used to create distance from vulnerable areas such as patios, balconies and windows. The usage of defensive planting can complement perimeter boundaries. Defensive planting recommendations: • Plants with flowers for aesthetics and to deflect harsh appearance. • To be mature planting from installation and reach a maximum height of 1m where sight lines need to maintained. Depth of planting will be site specific recommendations. • Positioned beneath windows and next to fences to deter potential offenders. • Require regular maintenance to prevent getting overgrown. • May require signage to warn of risk of injury (Occupiers Liability Act).

Further concerns

Disabled parking - It is unclear if the disable parking is for residents or the commercial element, if resident then the developer needs to clarify how they intend to provide a safe route for the resident to get to their apartment.

North Elevation access – This access is via a fenced area and at present does not show gated access which would be required to reduce ASB and crime in the alley

Appendix 2: Planning Policy

London Plan 2021

Policy D11: Safety, Security and Resilience to Emergency

This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.

Section B of policy D11

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.

Section C of policy D11

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.

The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism.

New buildings should therefore be **resilient** to all of these threats.

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.

Paragraph 3.12.10

Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

DMM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"

DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design".
The latest published guidance in this respect should be referred."

An Independent Sustainability report by AECOM on Tottenham area action plan states:

"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".

12.3 of same report states:

- Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.
- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- There are no references to crime in the **neighbourhood area sections**; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

Appendix 3 : Crime Figures

The crime figures provided below are publicly available on the Internet at <http://www.met.police.uk/>. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.

Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:

