



**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

Ian Smith
Development Management
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Kent

PY - Bromley Borough
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BR1 1ER
Telephone: 0208 2848889

Email: Mark.A.P.Headley@met.police.uk
Your ref: 19/03072/FULM
Our ref: SE 4531
Date: 8th December 2020

Re: 2, 4, 6 And 8 Danson Road Bexleyheath Kent

Dear Ian Smith,

With regards to:

Reference No: 19/03072/FULM

Address: 2, 4, 6 And 8 Danson Road Bexleyheath Kent

Proposal: Demolition of the existing dwellings and erection of a part 1/2/3 storey plus basement building to provide a 70 bedroom nursing home, with associated access

Thank you for contacting me with regard to this application, and the opportunity to offer comment on it.

I have reviewed the design and access statement and other documents provided with this application, and note the only reference to site security or security measures below:

Security

The development as a whole has been carefully planned so that it takes due account of recognised good practice relating to its overall design and relationship to the outside. All parking areas will be overlooked with windows from the elderly home. There will be appropriate internal security measures with window locks and doors appropriately alarmed throughout. Blank corners or blind spots are avoided wherever possible.

The extension uses an external lighting scheme which improves the quality of the external spaces after dark. Gates to the access routes at the north and south of the building will have a keypad enabling secure access to a safe and secure residents garden which has a 1.8m high fence integrated as part of the landscaping around its perimeter.

Whilst I am encouraged by this statement, the aims and principles of Secured by Design should be fully incorporated, as this development will house some of the most vulnerable members of the community and the above measures do not sufficiently address this.

From this statement, this does not appear to be a secure or safe garden, as 1.8m fence bordering open parkland should as a minimum be security rated, or be topped with a further 300mm of trellis to deter climbing.

Properties bordering open land, parks or railways are more likely to be subject to criminal interest, and should be protected accordingly. Further if the intended residents suffer dementia providing a secure environment must also be a consideration.

Suitable gating, on the building line should also be present to match the secure boundary treatments.

Keypad locking systems are not secure and can easily be defeated, these types of locks are subject to numerous internet videos, and once the codes are known can quickly become common knowledge amongst criminal elements, and are therefore not compliant with Secured by design.

From review of the supplied documents the support or back of house facilities appear limited, only featuring kitchens, staff changing areas and two admin offices, suggesting a more independent occupancy. So clarification as to the proposed level of care and staffing, including nursing and monitoring stations would be expected.

From the Carebase document, this building would be for residents who require full time care and assistance 24/7, so the on-site staff levels and monitoring of the documented alarmed doors and windows should be confirmed.

I believe this development, in this location, should be developed with the safety and security of residents and staff in mind, and the aims and principles of Secured by design should be fully incorporated.

There also remain several points, which for the personal safety of the occupants, visitors, and staff and for the security of the development as a whole I believe also need attention and clarification.

These include, but are not limited to;

The access control and movement throughout the building and grounds should be clarified and discussed. With additional security features on refuse store doors and communal access.

Recesses, blind corners and possible loitering places should be removed or provided with suitable monitored mitigation.

I would also seek clarification with regard to lighting and the glazing standards required on windows facing vulnerable areas.

Other considerations include the provision for secure mail delivery, the visitor strategy into the building, secure cycle storage, and the incorporation of 3rd party tested and accredited doors and windows into the fabric of the building should also be included.

In order to address these matters, as has been the case on a number of other care homes, I would request a Secured by Design condition be attached to ensure working with the SE design out crime office, and the incorporation of guidance from Homes 2019 which can be found at www.securedbydesign.com

The adoption of Secured by Design standards will help to reduce the opportunity for crime, creating a safer, and a more secure and sustainable environment.

The National Planning Policy Framework (NPPF)

Section 8 states

"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 states

"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 Bexley supplemental planning document "Design for living" as adopted in 2006 states:

"It is important for housing design schemes to embrace designing-out-crime principles including defensible space, natural surveillance, visibility, lighting and other security measures.

Secured by Design is the minimum standard considered suitable by the police service for safety and security. Local conditions may require additional or alternative measures.

Good design helps prevent crime, and early liaison with the Local Crime Prevention Officer is recommended."

I can confirm that at this time I have not spoken or discussed the security requirements for this site, and should a Secured by Design condition be attached, would request my contact details be passed to the applicant.

To assist the development in achieving Secured by Design accreditation, I would seek to have 'Secured by Design' conditions attached to any permission that may be granted in connection with this application. The wording such that the development will follow the principles and physical security requirements, to be agreed pre-commencement, and will achieve Secured by Design accreditation prior to occupation.

It is important to note that Secured by design has been applied successfully to a number of other similar care homes across London. The SE Design out Crime officers will provide advice on the whole design and layout of a development, with the aim of reducing the potential for crime and disorder, and I would encourage the planning authority and applicant to note the experience gained by the UK police service over the past 30 years in this specific subject area.

I trust these comments are of assistance

Yours Sincerely,

Mark Headley

Designing Out Crime Officer
SE DOCO Team - Metropolitan Police Service