



**METROPOLITAN
POLICE**

TOTAL POLICING

Territorial Policing

Enfield Planning Team
c/o [REDACTED]

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

[REDACTED]
[REDACTED]

Your ref: 24/00987/FUL

Related

Our ref: NE 7728

Date 23rd July 2024

Re: Planning Application at - Whitewebbs Park Golf Course Enfield EN2

Dear Enfield Planning Team,

Proposal - *Change of use of former golf course (Use Class F2) to provide a football training centre (Sui Generis) and parkland (Use Class F2), comprising of football pitches and associated infrastructure; change of use, modification and extension of the existing Northern Clubhouse building to provide football training centre and associated uses (Sui Generis); restoration and enhancement of parkland landscape, including new footpaths; reinstatement of historic carriageway in Whitewebbs Wood; modifications of existing Southern Clubhouse to form a replacement cafe and public toilets, alongside a part change of use to include a flexible community space (Use Class F1/F2/Class E); demolition of existing grounds maintenance building and construction of replacement grounds maintenance building; construction of gatehouse; hard and soft landscaping works to include land reprofiling; new vehicular and pedestrian access, including formation of a link to land to the east, and modifications to existing vehicular and pedestrian access and parking; restoration of Whitewebbs Pond; and associated works.*

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

With reference to the above application I have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on available information, including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.

It is my professional opinion that crime prevention and community safety are material considerations, because of the proposed use, design, layout and location of the development proposed. To ensure the delivery of a safer development in line with The London Plan 7.3, The NPPF and the Local Development Framework policies DMD 37, CP30, CP9, (See Appendix for details of these policies), I have highlighted some of my main areas of concern in Section 2.

The available content within the LB Enfield planning portal planning has been reviewed in regards to the above application and the position remains in that there has been no contact from the project design team or the applicant.

The DAS does now mention a security hub, but that's where the safety, security crime prevention plan ends.

We continue to hold serious concerns regarding safety, security and crime prevention for the site staff, the players, staff and the families that will attend the venue, and seek your assistance in encouraging the applicant's design team to contact us so that crime preventative mitigation can be reviewed.

Should the project receive planning permission I would seek the attachment of a Secured by Design condition being applied (Section 3). If the Conditions are applied, we request the completion of the relevant Secured by Design application forms at the earliest opportunity.

Section 2 - Design Comments/Concerns:

In summary we have site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations from the Plans. Site specific advice may change depending on further information or site limitations as the project develops:

- **Door/Window Specifications – more information required**
- **Access Control- type - more information required**
- **Postal Strategy- more information required**
- **Boundary Treatments – more information required**
- **Emergency Services Egress - more information required**
- **Bin Storage – more information required**
- **Cycle Storage – more information required**
- **Car Parking – more information required**
- **Roof make up – more information required**
- **Fuel Storage – more information required**
- **Machinery/Plant Storage – more information required**
- **Lone Women, Vulnerable young girls and young adults safety/security plan – more information required**
- **Lighting** – It is unclear what levels of illumination will be provided. A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots. It is advised that this reaches a level of 40% uniformity and is to BS 5489:2020. Dusk till dawn photoelectric cells with ambient white lighting is advised for best lighting practice. Bollard lighting as a primary light source is not recommended as it does not provide suitable illumination and creates an “up lighting effect” making it difficult to recognise facial features and thus increase the fear of crime.
- A Certificate of Competence will be required to sign off the lighting scheme.

CCTV – We recommend that colour HD CCTV is installed to provide coverage of vulnerable areas including the covered space at the building entrance, entrance lobby, post boxes, cycle store, and refuse store. Cameras installed in these locations should provide footage of sufficient detail to enable

identification* of an individual within the area concerned. (**Identification as defined within the DORI standard, based on IEC EN62676-4: 2015*). Any imagery must be stored for a minimum period of 30 days either in a secure facility within the building or within a 'Cloud' based system." This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinate with the planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use.

Crime prevention and community safety are material considerations. **If the L.B. Enfield are to consider granting consent, I would ask that the condition(s) and informative detailed below be attached.** This is to mitigate the impact and deliver a safer development in line with national, regional and local planning policies. The conditions satisfy the six tests detailed in Circular 11/95;

- (i) Necessary
- (ii) Relevant to planning
- (iii) Relevant to the development to be permitted
- (iv) Enforceable
- (v) Precise and
- (vi) Reasonable in all other respects.

The measures reflect the priorities in the LB Enfield' Partnership Plan 2017-2021 which are:

Reducing burglary and keeping people safe at home

Tackling violent crime – in all its forms

Keeping young people safe and reducing their risks from crime

Promoting cohesion and tackling hate crime

Dealing with anti-social behaviour

Section 3 - **Secured by Design Condition and Informative**

In light of the comments made, we request the following Condition and Informative:

Condition:

Prior to occupation, the development shall achieve a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police. The development shall be carried out in accordance with the approved details and thereafter shall be fully retained and maintained as such for the lifetime of the development.

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

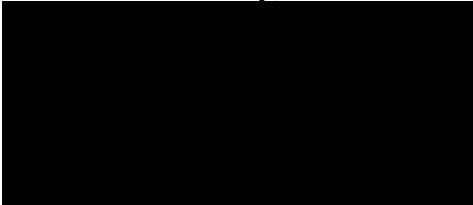
Informative:

In aiming to satisfy the condition the applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via [REDACTED] or [REDACTED]

Section 4 – Conclusion

We would ask that my interest in this planning application is noted and that we are kept apprised of developments. Should the Planning Authority require clarification of any of the above comments please do not hesitate to contact us at the above office.

Yours sincerely,



**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.

Legislation & SBD Guidance:

<u>Appendix 1: Local Policy</u>
--

- **The London Plan**

A The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.

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.

Other London Plan Policy considerations D11, D12 D8, D9, H16,

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 considers counter terrorism measures:

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.

- **The National Planning Policy Framework (NPPF)** states:-

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.

- **London Borough of Enfield Development Management Document 6.1**

DMD 37 from the L B Enfield Development Management Document (adopted Nov 2014) Achieving High Quality Design-Led Development

- **Core Policy 30 Maintaining & Improving the Quality of the Built & Open Environment.** All development and interventions in the public realm must be high quality and design-led, having special regard to their context, They should help to deliver Core Policy 9 (Supporting Community Cohesion) by promoting attractive, safe, accessible, inclusive and sustainable neighbourhoods, connecting and supporting communities and reinforcing local distinctiveness
- **Core Policy 9 Supporting Community Cohesion** contributing towards reducing crime, fear of crime, and anti-social behaviour by using design principles that create environments which promote community safety & discourage offending in accordance with Core Policy 30

The **Supplementary Planning Documents ‘Designing Safer Places’** and **‘Landscaping’** provide further additional guidance supporting the recommendations.

- **Section 17 of the Crime and Disorder Act 1988** states “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.
- **The National Planning Policy Framework (NPPF)**

“Planning policies and decisions should aim to ensure that developments create: Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.”

We strongly advise that independent third party certification is obtained from a manufacturer to ensure the fire performance of any of their door sets in relation to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire

This application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. 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.