

Schedule of Responses to the Draft Designing Out Crime SPD

REF	Name	Comment	Response
1	Anonymous	<p>There is no reference to crimes committed by drivers e.g. speeding and dangerous driving.</p> <p>There is no reference to antisocial behaviour from drivers e.g. illegal parking, double parking, idling, blocking pedestrian crossings, failing to give way at crossings.</p> <p>There are design principles that can address these issues and that should be part of "designing out crime" planning document.</p>	<p>Noted – no changes.</p> <p>This document relates to designing out crime within the planning process. Section 85 of the Traffic Management Act 2004 gives builders the lawful authority to double park in the road if they are loading or unloading or continually engaged in construction activity. Where a vehicle creates an obstruction on the highway only the Police have the power to instruct the driver to move or to enforce using Fixed Penalty Notices (FPN) (as the Council does not have the power to direct traffic or bring proceedings in response to an obstruction, no matter how egregious).</p> <p>Our parking enforcement colleagues act against illegally parked vehicles and issue thousands of Penalty Charge Notices annually.</p> <p>Local Plan Policy TR1 states, “development that changes the existing street network, including the addition or modification of accesses, street layouts and road crossings must serve to</p> <p>(i) improve street safety in line with the Vision Zero approach”.</p>

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			Section 3.6 'Vehicle Parking' (page 16) deals with minimising the opportunity for crime in relation to car park design.
2	Counter Terrorism Advisor MPS	<p>It was good to meet with you yesterday and thank you for adopting many of my suggestions throughout the Designing Out Crime Planning Document.</p> <p>There are a few suggestions and changes that I include in this email to assist with the effective delivery of Counter Terrorism protective security messaging.</p> <ol style="list-style-type: none"> <li data-bbox="533 767 1339 858">1. Pg. 7: Physical Protection / Target Hardening Can best practice language be adopted in this paragraph? <p><i>Suggestion</i> Developers to consult Local Counter Terrorism Security Advisors (CTSAs) at the pre-planning stages to ensure that adequate protective security measures are included from the outset in the design.</p> <ol style="list-style-type: none"> <li data-bbox="533 1050 1339 1157">2. Pg. 9 "For major developments has the Counter Terrorism Security Advisor been referred to?" Please could referred to be changed to been consulted? I would also like two further points added: <li data-bbox="533 1241 1339 1348">3. Has a Threat and Vulnerability Risk Assessment been conducted? And if not, why not (reasons recorded for corpocracy) 	<p>Suggestions noted, no changes:</p> <ol style="list-style-type: none"> <li data-bbox="1420 564 2029 778">1. P7: Physical Protection & Target Hardening: This page describes what physical protection and target hardening is, consultation with CTSAs is included in section 3.11 Crowded Places and Counter Terrorism, page 21. <li data-bbox="1420 783 2029 1029">4. <i>"For Venues and Public Spaces with a capacity of 200 and over, a TVRA should be conducted and the CTSA consulted at the earliest stages of planning."</i> This is included in the counter-terrorism section, page 21, that where relevant this should be conducted. <p>Suggestions noted, changes made:</p> <ol style="list-style-type: none"> <li data-bbox="1420 1209 2029 1383">2. P9: Checklist - Physical Protection amend <i>"has the Counter Terrorism Security Advisor been referred to?"</i> to <i>"has the Counter Terrorism Security Advisor been consulted"</i>

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		<p>4. For Venues and Public Spaces with a capacity of 200 and over, a TVRA should be conducted and the CTSA consulted at the earliest stages of planning. (This is in reference to Martyn’s Law, without explicitly naming it) For more information on Martyn’s Law please see: www.protectuk.police.uk/martyns-law/martyns-law-overview-and-what-you-need-know</p> <p>5. Pg. 20 <i>MPS Counter Terrorism officers</i> should read: Counter Terrorism Security Advisors</p> <p>6. Pg. 21 Please consider amending this passage to: “<i>The presence of Nationally iconic and Internationally recognisable tourist attractions and destinations within the Borough, which draw vast crowds makes these venues and public spaces attractive to hostile actors who seek to commit terrorist attacks.</i>”</p> <p>The 3rd paragraph has a few errors. Please amend with the following:</p> <p>7. The National Counter Terrorism Security Office (NaCTSO) – ProtectUK, National Protective Security Authority (NPSA) formerly Centre for Protection of National Infrastructure (CPNI), Counter Terrorism Security Advisors (CTSA) (please see links on pg 22)</p> <p>8. Pg. 22 Under the NPSA website please include: www.npsa.gov.uk/public-realm-design-guide-hostile-vehicle-mitigation-0</p> <p>Under the NaCTSO heading should be this website: www.protectuk.police.uk</p>	<p>3. Add “<i>Has a Threat and Vulnerability Risk Assessment been conducted?</i>”</p> <p>5. P20: change: “<i>MPS Counter Terrorism Officers</i>” to “<i>Counter Terrorism Security Advisors</i>”</p> <p>6. P21: change: “<i>The presence of popular tourist attractions and destinations within the Borough, and the vast crowds that can accompany them, can potentially render such areas more vulnerable to terrorist attacks</i>” to “<i>The presence of Nationally iconic and Internationally recognisable tourist attractions and destinations within the Borough, which draw vast crowds makes these venues and public spaces attractive to hostile actors who seek to commit terrorist attacks.</i>”</p> <p>7. CT agencies to be corrected/updated.</p> <p>8. Add suggested links</p>

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		<p>Counter Terrorism Security Advisors (CTSAs) <u>PSO-CTSASupervisors@met.police.uk</u></p> <p>Please may I ask that no named reference to me be recorded on the public document.</p> <p>I hope this helps with comprehensive updates and I need to re-iterate how heartening it is that you have adopted Counter Terrorism Protective Security Measures in this document. It certainly is what we would consider best practice.</p> <p>If you require any clarification or have any questions at all, please contact me, I am happy to help.</p>	
3	<p>Paul Bird</p> <p>Police Constable</p> <p>MPS DOCOs</p>	<p>Thank you for meeting with my colleagues and I to discuss the draft RBKC Designing Out Crime supplementary planning document.</p> <ol style="list-style-type: none"> 1. As discussed, we very much appreciate all the references to the Secured by Design Scheme and intention to include an SBD condition on applications that meet the relevant criteria. I recommend all major planning applications as defined by the Town and Country Planning Order 2015 continue to be sent to my office for consultation and we will request an SBD condition if an award is achievable. Can I ask that my office be notified when an application is approved and an SBD condition is attached. I would also ask that the applicant be advised to contact my office at their earliest opportunity. 	<p>Noted. No change:</p> <ol style="list-style-type: none"> 1. Response to request for revision of example condition: Page 4: The wording within the SPD is for an example condition that could meet the necessary tests for a planning condition. The exact wording of any formal condition attached to a planning decision will be recommended by the individual case officer at the time of decision making, following stakeholder consultation. 5. Page 9: This is a high-level quick guide and there is a bullet point in the same section that makes reference to Secured by Design guides on window, door and lock design. Bullet removed

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		<p>Please find below feedback from the Metropolitan Police Service Design Out Crime Team. I have highlighted the relevant sections / text in yellow on the attached PDF for your convenience:</p> <p>Page 4: Example condition wording: Although this example wording was previously provided by my office, I ask that the below more concise alternative wording for the SBD condition and informative be considered:</p> <p>Condition: <i>Each building, or part of a building, shall obtain a ‘Secured by Design’ accreditation prior to first occupation of each building or part of a building, or use. The development shall only be carried out in accordance with the approved details and maintained thereafter.</i></p> <p>Informative: <i>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 docomailbox.sw@met.police.uk.</i></p> <ol style="list-style-type: none"> 2. Page 4: Paragraph 1 - MPS crime prevention design advisors should be changed to MPS Designing out Crime Officers (DOCOs) 3. Page 4: Heading 1.4 - Secured by Design & Designing Out Crime Advisors should be changed to Secured by Design & Designing Out Crime <u>Officers</u> 4. Page 9: Physical Protection: Has the Crime Prevention Adviser been referred to for advice? Design out Crime Advisors should be changed to Designing out Crime <u>Officers</u> (DOCOs) 	<ol style="list-style-type: none"> 6. Page 9: Intercoms and audio-visual entry systems are not planning matters. <p>Requests for amendments to the following accepted:</p> <ol style="list-style-type: none"> 2. Page 4: Change text to read: <i>MPS Designing Out Crime Officers (DOCOs)</i> 3. Page 4: Change heading text to read: <i>1.4 Secured by Design & Designing Out Crime Officers</i> 4. Page 9: Change text to read: <i>Has the Metropolitan Police’s Designing Out Crime Officer been referred to for advice?</i> <p>7. Page19: Request to add link to main text of section 3.8. This will be added to the appendix:</p> <p>https://www.securedbydesign.com/images/CONSTRUCTION_SITE_SECURITY_GUIDE_A4_8pp.pdf</p> <ol style="list-style-type: none"> 8. Page22: Old contact details to be removed.

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		<p>5. Do windows comply with BS 7950: 1997, and doors to PAS23/24-1: 1999? – These are out of date standards - Suggested wording, <i>‘Do the doors and windows comply with GB Building Regulations as well as being tested and certificated by an independent third party, accredited by a United Kingdom Accreditation Service (UKAS) Notified Body’</i></p> <p>6. Has a visual audio entry system been provided for development of over eight households? – SBD guidance on this point is, communal entrance doors that serve 4 dwellings or more in buildings that are more than two storeys in height are required to be connected to a visual audio access control system</p> <p>7. Page 19: Reducing Crime During Development Works – Can the SBD <i>Construction Site Security Guide 2021</i> be included as a point of reference: https://www.securedbydesign.com/images/CONSTRUCTION_SITE_SECURITY_GUIDE_A4_8pp.pdf</p> <p>8. Page 22: Heading 4 Further information 4.1 contacts - Crime Prevention Design Advisor, Metropolitan Police Kensington Police Station, 72 Earl’s Court Road London W8 6EQ, Tel: 020 8246 0757, Email: Web: www.met.police.uk/kensingtonandchelsea - This contact should be removed as the post no longer exists, please just leave the DOCO contact details.</p>	
4	Miles Watson Urban Eye	<p>Q1: Do you have any comments on the Draft Designing Out Crime SPD?</p> <p>Thank you for drawing up The Supplementary Planning Document “Designing Out Crime”. It is such an important aspect for residents in North Kensington.</p>	Noted.

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		<p>My comments relate to point 3.4 Lighting.</p> <p>I agree that good lighting is an important tool for designing out crime. I started a local charity in 1999 (Urban Eye) initially with the aim of improving the painting and lighting under the Westway Flyover. When the lighting was installed, it changed the whole feel of the area. The sense of safety increased.</p> <p>Since then, Urban Eye has received grants and funding to deliver other projects in RBKC. Attached are six PDFs (just one page each) where lighting plays a major part in discouraging crime and improving the appearance of places at night. From our experience, involving the community in local projects had a tremendous effect in the artworks being respected and remaining tag free. And the lighting, we strongly believe, helps in its own way in designing out crime.</p>	
5	<p>Sharon Jenkins</p> <p>Assistant Officer</p> <p>Natural England</p>	<p>Thank you for your consultation request dated and received by Natural England on 28th November 2024.</p> <p>Draft Designing Out Crime Supplementary Planning Document (SPD) for Kensington and Chelsea Royal Borough Council</p> <p>Thank you for your consultation request on the above dated and received by Natural England on 28th November 2024.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	Noted.

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		<p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>Natural England does not have any specific comments on the draft Designing out Crime SPD for Kensington and Chelsea Royal Borough Council.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance</p>	

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		with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.	
6	Michelle Stratton Historic England Planning Advisor London and Southeast Region	<p>Thank you for the opportunity to comment on draft Designing Out Crime Supplementary Planning Document (SPD). As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</p> <p>We welcome and support that the draft SPD recognises that designing out crime requires consideration of the historic environment. Nonetheless, we would encourage further integration of the topic as per our comments below.</p> <p>At section 1.6 (p. 5) 'RBKC Historic Context' we recommend the following amendments:</p> <ul style="list-style-type: none"> • 1. The reference to 'Scheduled Ancient Monuments' should be changed to 'Scheduled Monuments', which is now common parlour in light of not all scheduled monuments being 'ancient'. • 2. The reference to 'listed structures' should be amended to 'designated assets' as, technically speaking, only buildings/structures are listed. • 3. We advise expanding the first paragraph of section 1.6 to note that: • 'great weight' is given to the conservation of heritage assets. • 4. not all heritage assets designated, and that the borough is also rich in non-designated heritage assets. 	<p>Response noted.</p> <p>Accepted changes/additions to be made:</p> <p>Page5, section 1.6 RBKC Historic Context</p> <p>1.6. To now read: The Borough is home to 39 conservation areas and approximately 4,000 designated assets, which include listed buildings, scheduled monuments and other heritage assets as well as a vast number of non-designated heritage assets.</p> <p>Interventions should seek to 'conserve and enhance' the significance of heritage assets. When considering the impact of a proposed intervention in the interests of designing out crime great weight should be given to the asset's conservation, and any proposal should be informed from the outset by an understanding of the significance of any heritage assets potentially affected. Where heritage assets may be affected heritage impact assessments are likely to be needed, and early engagement with the borough's conservation officers, the Greater London Archaeological Advisory Service, Historic England and the Gardens Trust, as appropriate should be made.'</p>

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		<ul style="list-style-type: none"> • We advise expanding the second paragraph of section 1.6 to note that: • 5. Interventions are informed from the outset by an understanding of the significance of any heritage assets potentially affected. • 6. Interventions should seek to ‘conserve and enhance’ the significance of heritage assets. • To highlight that where heritage assets may be affected heritage impact assessments are likely to be needed, and encourage early engagement with the borough's conservation officers, the <u>Greater London Archaeological Advisory Service</u>, <u>Historic England</u> and the <u>Gardens Trust</u>, as appropriate. • To highlight that works with the potential to affect the significance of listed buildings, • The reference to ‘special regard’ currently only applies to listed buildings and conservation areas. It would be better to use the language of the NPPF (e.g. ‘great weight’ to the conservation of heritage assets) as this is more universal in application to all designated heritage assets. <p>At section 2.2 ‘Checklist of Design Principles - A Quick Guide’ (p.9) we note that the ninth bullet point under Physical Protection is: ‘Has the potentially negative visual impact of crime measures been ameliorated by good design?’ It is unclear if this is intended to cover effects to the historic environment, but, if so, we would highlight that there is the potential for a wider range of effects than just visual ones and that good design is not necessarily going to avoid or mitigate them. Given this, we would advocate that an additional bullet point is added which questions whether impacts</p>	<p>2.2 Add bullet under physical protection: Have the impacts to the significance of heritage assets have been avoided and minimised?’</p> <p>3.2 Amend bullet point to read <i>“Respect historic character and significance (including any contribution made by setting) where present”</i></p> <p>3.3 Landscaping Add below main text- ‘Consideration should be given to the conditions of the walls and appropriate fixings’</p> <p>New paragraph below to be added: ‘Lighting is an is an experiential component of setting and can contribute to a heritage asset’s significance and/or its appreciation. Therefore, change to lighting must be carefully considered to ensure that the significance of an asset is not harmed, and to consider whether there are opportunities to enhance the understanding/ appreciation of a heritage asset’s significance.</p> <p>Add bullet: ‘Conserve and enhance the significance of heritage assets’</p> <p>CCTV – amend 4th bullet point to read</p>

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		<p>to the significance of heritage assets have been avoided and minimised.</p> <p>At section 3.2 'Boundary Treatments' (p.12) we welcome and support that the historic environment is considered at the last bullet point in the section on developer's considerations. However, as when talking about setting we are really taking about significance, we advise rewording it to: '<i>Respect historic character and significance (including any contribution made by setting) where present</i>'.</p> <p>In relation to section 3.3 Landscaping (p.13), we would highlight that any support for climbing plants on listed buildings should seek to be attached to the mortar joints, or it may need listed building consent. Alternatively, if ivy is considered then it will be self-attaching, and the key consideration would be ensuring that the wall is in good condition as it could exacerbate any existing issues (please see our webpage – Ivy on Walls).</p> <p>In relation to section 3.4 'Lighting' (p.14), we advise highlighting that lighting is an is an experiential component of setting and can contribute to a heritage asset's significance and/or its appreciation. Therefore, change to lighting has to be carefully considered to ensure that the significance of an asset is not harmed, and to consider whether there are opportunities to enhance the understanding/ appreciation of a heritage asset's significance (see our External Lighting of Buildings webpages and Streets for All Guidance for more information). This additional text would work well coming after the point that lighting can improve the appearance of places at night, but that this needs to be balanced against potential impacts (which should include the</p>	<p>'Consider the effect on the appearance of a place in their design and location and consider the impact on the significance of any heritage assets'</p> <p>3.7 Streetscape and Street furniture</p> <p>Add new para:</p> <p>Streetscape and Street Furniture can be important components of historic character, with some elements constituting heritage assets in their own right and contributing to the significance of nearby heritage assets as part of their setting. Guidance can be found in Historic England's 'Streets for All' guidance, which considers how improvements can be made to public spaces without harm to their valued character, including specific recommendations for works to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements.</p> <p>Link added to end of document.</p> <p>3.10</p> <p>Amend first sentence to read:</p> <p>The Borough contains some of London's iconic high streets, with many shopfronts that date from mid-19th Century. It is important that any design for improving security does not detract from this historic character and conserves their significance.</p>

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		<p>historic environment). We also suggest that the point is added to the 'Proposals for new lighting' checklist either as a separate requirement to 'conserve and enhance the significance of heritage assets' or 'Avoid and minimise harm to the significance of the heritage assets.</p> <p>At section 3.5 'CCTV' (p.15), we welcome and support the consideration of the impact on the historic environment and advise that this is carried through to the CCTV checklist. The fourth bullet point currently reads as: 'Consider the effect on the appearance of a place in their design and location'. However, the historic environment is managed in relation to 'significance', a universal framework that translates the requirements of legislation for individual asset types (e.g. the need to consider the character and appearance of conservation areas or special interest of listed buildings). We therefore suggest that this bullet point is expanded to include the need to consider the impact on the significance of heritage assets.</p> <p>We would highlight that Streetscape and Street Furniture (discussed at Section 3.7, p. 18) can be important components of historic character, with some elements constituting heritage assets in their own right and contributing to the significance of nearby heritage assets as part of their setting. As this requires careful management, we would welcome a reference being added here to our '<u>Streets for All</u>' guidance, which considers how improvements can be made to public spaces without harm to their valued character, including specific recommendations for works to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements. We would also</p>	

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		<p>ask that this guidance is added to section 4.2 'Useful websites and documents'(p.22).</p> <p>We welcome the recognition at Section 3.10 'High Streets, Retail and Commercial Premises' (p.20) that the borough contains important historic shopfronts. However, we would ask that the second sentence is amended to refer to the need to conserve significance, in addition to historic character.</p> <p>We hope that the information provided herein is helpful and encourage you to get in touch should you have any queries or wish to further discuss any points raised. Please note that the advice provided herein is based on the information that has been provided to us within the consultation documents. It does not affect our obligation to advise on, and potentially object to any specific proposal subsequently arising from these documents, should it have adverse effects on the historic environment.</p>	
7	<p>Maeliosa Hardy Planning Consultant</p> <p>Port of London Authority</p>	<p>Thank you for the invitation to comment on the above consultation on the RBKC Designing Out Crime SPD. We have now had the opportunity to review the document and have the following comments to make.</p> <p>The PLA's key interests with regard to this consultation are on the health and safe use of the river and to enable the safe use of the Tidal Thames alongside any forthcoming development.</p> <p>The PLA have published 'A Safer Riverside' guidance for development on and alongside the river (https://www.pla.co.uk/assets/asaferriversidev15.pdf), which</p>	<p>Noted response and request for an amendment to the sections on natural surveillance and lighting to include consideration of aquatic habitats to be added to the SPD. Amendment to be added to lighting section of SPD.</p> <p>1. New paragraph page 14:</p> <p><i>The borough benefits from being home to various bodies of water and as such a careful balance needs to be struck between providing sufficient levels of illumination of a riverside path or bridge with even distribution of light across the area being</i></p>

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		<p>includes a series of recommendations that must be considered as part of all development alongside or on the tidal Thames.</p> <p>We are supportive of the measures set out in Chapter 2 (Planning an Attractive and Safe Environment); however, we would ask the Council to consider some additional text within the Checklist of Design Principles (2.2). In relation to ‘Natural Surveillance’, we would suggest that</p> <p>item 7 (Is the lighting design sensitive to its environment and sustainable yet effective in crime prevention?) is reworded or an additional point is included to provide specific reference to aquatic habitats and navigational lighting within a riverside context. A careful balance needs to be struck between providing sufficient levels of illumination of a riverside path or bridge with even distribution of light across the area being illuminated, to provide a safe riverside environment but avoiding high levels of illuminance and glare that could negatively impact on ecology and vessel navigation. This could also be reflected in section 3.4 on lighting.</p>	<p><i>illuminated, to provide a safe riverside environment but avoiding high levels of illuminance and glare that could negatively impact on ecology and vessel navigation.’</i></p> <p>2. Amend bullet 7 in 2.2 - Natural Surveillance to read:</p> <p><i>Is the lighting design sustainable, appropriate for and sensitive to its environment, yet effective in crime prevention?’</i></p> <p>This is a high-level quick guide, and the bullet point now makes it clear that lighting design should be “sustainable, appropriate for and sensitive to its environment”</p>
8	<p>Lots Village Chelsea Resident’s Committee</p>	<p>Without needing to complete the whole form, we just wanted to comment on balconies The draft mentions making sure they are not easy to climb onto, but we have another concern</p> <p>We are in Lots Village. On Lots Road South it is proposed that the flats have balconies (to give each unit outside space). Whilst this is acceptable within the plot on the estate itself, we felt that the proposal for Lots Road itself is unacceptable as the building would be directly into the pavement, then obviously onto the road which is a bus route.</p>	<p>Response noted. No change:</p> <p>This response specifically relates to the design of balconies and the potential risk of ASB in the Lots Road development. This SPD is a borough-wide document that addresses best practice in designing out crime, and specific interventions such as this would not be appropriate for such a document. Amendment is unlikely to be adopted within this SPD.</p>

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		<p>We have pointed this out to the developers/the council.</p> <p>We have heard from other Associations that their estate balconies cause a great deal of ASB. Pizza boxes thrown, general debris and even televisions. We think this presents a considerable danger to the general public and this should be designed out of schemes.</p>	
9	Cllr Adourian	<p>Thanks for sharing this draft for consultation. I'd like to highlight several areas where the document could be strengthened:</p> <ol style="list-style-type: none"> 1. Whilst the SPD touches on ASB generally, there is scope to expand on specific types, such as loitering, begging, aggressive behaviour, and vandalism. Additionally, more detailed strategies to address drug-related issues—such as designing out concealed areas prone to loitering—would add value. 2. The SPD would benefit from guidance on addressing rough sleeping in public spaces, e.g. spaces should incorporate features that discourage this from taking place. 3. While the SPD focuses mainly on new developments, it would be helpful to explicitly extend its principles to planning applications for changes of use and the retrofitting of existing buildings and public spaces. 4. Although inclusivity is mentioned, the SPD could place greater emphasis on the needs of women, children, older people, and disabled people. Specific design principles catering to these groups would enhance the document. 5. Community engagement is also essential in creating spaces that genuinely feel welcoming, as well as safe. The SPD could place more focus on the importance of public consultations throughout the design process and post- 	<p>Recommendations noted. Summary of suggestions:</p> <ol style="list-style-type: none"> 1. This document specifically relates to planning issues and the issues noted whilst may be impacted by the positive guidance in here are dealt with separately. 2. This is a planning document; other alternative positive measures should be incorporated outside of this SPD to deal with cases of rough sleeping. Some issues here are dealt with within defensible space and layout sections. 3. All development proposals is stated in second bullet of purpose of this doc p2 4. The SPD notes specific needs should be taken into account of all groups. 5. The Council does this generally for all development. However, within 2.1. Ownership engagement is specifically stated. 6. This is a guidance document based on existing policy. The Local Plan has measurable metrics for review.

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		<p>implementation phases to ensure that solutions reflect the needs of local residents.</p> <p>6. Introducing clear metrics or benchmarks for success—such as reductions in ASB incidents or community satisfaction surveys—would provide measurable outcomes and help ensure accountability.</p> <p>7. Effective management and maintenance are critical for the long-term success of crime prevention measures. Including further guidance on this aspect, alongside case studies or examples, would also strengthen the document.</p> <p>Finally, I think it should be renamed “Designing Out Crime & ASB”.</p>	<p>7. Clear guidance on the principles have been included. Management and maintenance plans should be specific to the development itself.</p> <p>8. Whilst the content of the document deals also with some aspects of ASB, owing to the variety and nature of ASB it focusses mainly on crime and the impact planning can have.</p>
11	Emma Dandy ECDC	<p>Dear Sir/Madam,</p> <p>Draft Designing Out Crime SPD</p> <p>Thank you for providing us with the opportunity to comment on the Royal Borough of Kensington and Chelsea (RBKC) draft Designing Out Crime SPD through the current consultation. These representations are made by the Earls Court Development Company ('ECDC') on behalf of the Earls Court Partnership Limited ('ECPL'). ECDC is the Business Manager responsible for the delivery of the Earls Court site. ECPL is a joint venture between Delancey (on behalf of its client funds) and the Dutch pension fund manager, APG and Transport for London (TFL). ECDC supports the preparation of the Draft Designing Out Crime SPD which aligns with the approach embedded within our proposals for the Earls Court Site.</p> <p>At Earls Court, ECDC has supplemented the Designing Out Crime principles through specific local engagement around safety. This has led to the production of a toolkit for the inclusive design of</p>	Noted.

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		<p>safe places, using engagement and codesign to ensure that design teams for large projects are informed by local experience when designing safe places.</p> <p>ECDC has presented the toolkit work to RBKC planning officers and SBD officers and it was well received. We would be happy to share the full toolkit which we are launching shortly, and this could form the basis for guidance on engaging locally to understand perceptions around safety and the successful response of proposals to these needs.</p> <p>In summary, ECDC offers its support for the objectives of the Draft Designing Out Crime SPD.</p>	