



Richmond Planning Services
London Borough of Richmond upon Thames
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Your ref: 22/3004/FUL
Our ref: SW5882

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Location – Kneller Hall Royal Military School Of Music Kneller Road Twickenham TW2
7DU

The demolition of existing modern buildings on the site and the conversion of and extensions to Kneller Hall and other ancillary buildings associated with the former royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities, sporting pavilion and forest school building. Alterations to the existing playing fields, to include an all weather pitch with fencing, flood lighting to existing tennis courts, sustainability measures and re-turfing. Provision of a new access from Whitton Dene, and other ancillary works including parking areas, hard and soft landscaping, lighting, access alterations and energy centre. Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller Hall, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance.

Secured by Design –

I recommend the development is built incorporating crime prevention principles and uses tested and certified products where appropriate to ensure effective, reliable and good quality products are used in the development. I therefore recommend the developer follows the latest Secured by Design Guides, which can be found on the SBD website. We recommend that a condition is placed for the development to achieve SBD certification.

www.securedbydesign.com/guidance/design-guides.

Crime Risk Overview

The average current crime rate in Richmond Borough is 62 crimes per 1000 residents per annum. For comparison this is significantly below the average London crime rate which is 102 crimes per 1000 population annually. The average number of crimes per month in Whitton is currently 64. These crime figures are significantly below average figures for London but with increasing population density the development brings they are at risk of increasing.

Crime statistics

The most recent figures show the top 5 crimes reported over the last 12 months in the Whitton ward as:

1) Anti-social behaviour	186 incidents (24.3%)
2) Shoplifting	154 offences (20.2%)
3) Violence and sexual offences	149 offences (19.5%)
4) Vehicle crime	71 offences (9.3%)
5) Other theft	52 offences (6.8%)

Other offences:

• Burglary	36 offences (4.7%)
• Bicycle theft	16 offences (2.1%)
• Robbery	13 offences (1.7%)

Between May 2023 and April 2024 - figures from www.police.uk

As is often frequent in London the results indicate that much of the reported crime was linked to the public realm with anti-social behaviour and violence/sexual offences normally seen in the high street economic and residential areas.

Design and Layout

We have consulted with a security consultant employed by the developer to satisfy the requirements for BREEAM, we would be happy to work with the developer should the scheme be conditioned to achieve Secured by Design certification.

The development is sited within existing school grounds incorporating original elements which are listed buildings, ensuring appropriate boundary treatments is essential to the safety of those using the site, including staff, students and visitors. Where there is a possibility of community use or shared use facilities it is advisable for suitable secure division between shared and private school access areas to be incorporated at the initial build as it can be difficult to create this at a later date.

As the building is not a "New School" and part of it is a listed building we would advise that the development meets the SBD "commercial" guide as this would allow for a bronze award should there be bespoke requirements. Reference to the schools guide 2014 will be made where appropriate.

Main entrance doors should be tested and certified products with additional testing for duty levels (BS6375 part 2) as they will likely be subject to substantial use, accessible windows will also need to be tested and certified to meet PAS24/2022 or STS 204. Any specific requirements for accessible windows or bespoke fitments due to building requirements would need to be discussed and agreed with the designing out crime officer.

Perimeter fences and gates should be security rated, tested and certified (LPS 1175 SR1) products as specified in the design guides with specific requirements being discussed with the DOCCO.

All access control visitor points should be audio and visual with data logging capability. It should conform to UL293.

Please note for all products requiring certification the manufacturer or fabricator supplying the finished product to site is required to present independent third party certification from a single UKAS accredited certification body satisfying all the performance elements. All door and window styles and components will need to be adequately described within the scope of certification and accompanying Technical Schedule.

Recommendations -

I see no reason why all aspects of this development cannot achieve Secured by Design certification and as stated above to ensure that the development achieves an element of security for the rationale above I would like to request the following planning conditions if an employee requirement to achieve SBD accreditation has not already been sought;

- 1. The development shall achieve 'Secured by Design' accreditation awarded by the Design-Out Crime Officer from the Metropolitan Police Service on behalf of the Association of Chief Police Officers (ACPO).**
- 2. Prior to first use accreditation will be evidenced as achieved and evidence of such accreditation will need to be submitted and approved in writing to the Local Planning Authority.**

These planning conditions are in pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well-being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with the London Plan 2021 in Section B of policy D11.

Please note the recent London Plan 2021. In Section B of policy D11 states:

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.

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.

Yours sincerely,

Matt Scales

Designing Out Crime Officer for Richmond & Hounslow