



Bedfordshire Police

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Submitted By Email / Online

FAO: Planning Policy Team

Designing Out Crime Team

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Luton Local Plan Review (LLP) - Consultation Comment

EXECUTIVE SUMMARY:

Thank you for inviting Bedfordshire Police DOCO team to comment on the above.

Whilst we are not sure if you can add any of the observations that we are making, we would be willing to discuss this further with you so that the comments which follow can be adapted in some way to fit within the new 'LLP'.

We would refer to the following documentation included in this review which have been noted as having reference to the purpose and aims of 'Designing out of Crime, Sustainability of Development and Crime Prevention.

Draft Luton Local Plan (LLP)

Page 14 - Providing Sustainable and Suitable Homes

Page 16 - Town Centre and Retail

Page 22 – Placemaking and Design

Sustainability Appraisal Scoping Report

Chapter 5 Objective 14 – Provide decent affordable and safe homes

Duty to Cooperate and Consultation Background Paper (December2024)

Page 16 Para 1.80 Provision of security, community and cultural infrastructure and other local facilities (including burial capacity) – We confirm that Bedfordshire Police will want to continue to be involved and provide comment in all forms of consultations.

The **National Model Design Code** states on page 61, section P.3.i that:-

“Neighbourhoods need to be designed to make all people feel safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design (SBD) which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice are available from the police through a network of Designing Out Crime Officers (DOCOs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.”

Bedfordshire Police have 2 DOCOs available to provide advice and guidance for developers and we are contactable at the following email address; doco@beds.police.uk.

Beds Police DOCOs are also consultants on planning applications and our responses are primarily concerned with the prevention of crime and disorder within the built environment, using the principles of Secured by Design (SBD) and CPTED (Crime Prevention Through Environmental Design).

Bedfordshire Police's Designing Out Crime Officers are committed to supporting the Force's priority to prevent Male Violence Against Women and Girls (MVAWG) and, as such, this issue will be taken into consideration in all DOCO responses.

1. We ask that the new Luton Local Plan (LLP) will support the promotion of Secured By Design (SBD). This will ensure that developers properly consider the measures involved in designing out crime to create and maintain a sustainable community in accordance with; -

- the National Model Design Code,
- the National Planning Policy Framework, Luton Borough Councils proposed Sustainable Scoping Report/Community Strategy, and Section 17 of the Crime & Disorder Act 1998.
- Bedfordshire Police will therefore be encouraging all local neighbourhood plans to incorporate the Secured By Design (SBD) principles and, where applicable, to apply for the SBD Developers Award.

1.1. To give a summary of SBD, it is a long-running flagship initiative of the National Police Chiefs' Council (NPCC).

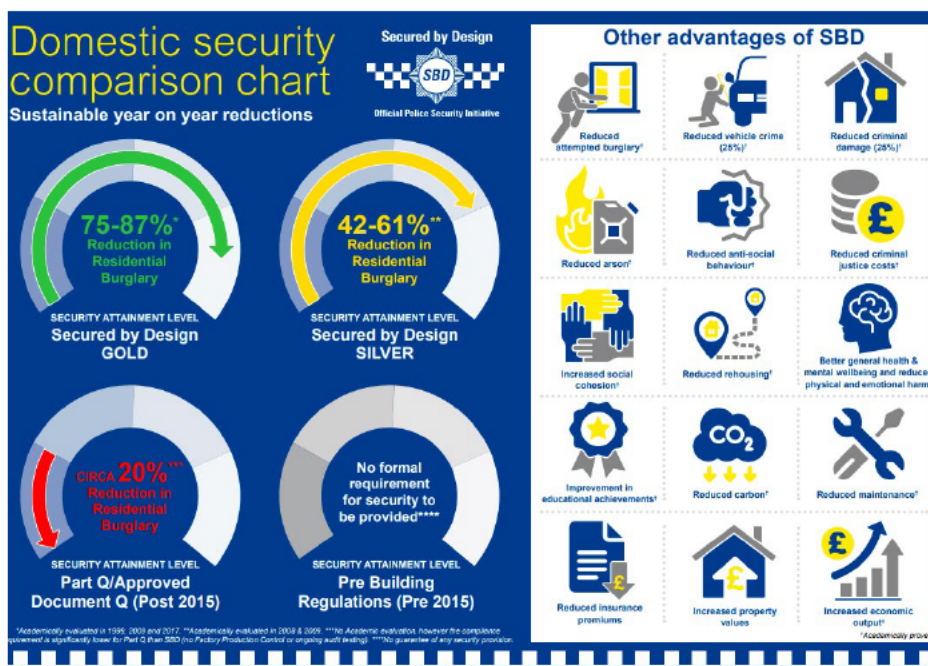
1.2. Its objective is to design out crime during the planning process.

1.3. It is a highly respected standard in the sector, supported by numerous public bodies and professional organisations.

1.4. SBD is therefore a vital guidance resource for planners and developers. SBD is available online, regularly updated and consequently, there is no danger of it ceasing to exist during the lifetime of the Local Plan.

1.5. It should be noted that SBD can be applied to all sizes of new build developments, (residential, community, educational, leisure and commercial), self-builds and refurbishments.

1.6. The benefits of incorporating Secured By Design into future developments is summarised in the infographic below: -



2. In all planning consultation Bedfordshire Police’s Designing Out Crime Officer response will be primarily concerned with the prevention of crime and disorder within the built environment and will be based on the following statements: -

NATIONAL PLANNING POLICY FRAMEWORK December 2023: NPPF 2023, Section 8 Para 96-b) 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”.

NPPF 2023, Section 12 Para 135-f) 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”.

3. Crime Prevention Through Environmental Design (CPTED): - In all planning consultation Bedfordshire Police will also make reference to CPTED which is an international crime prevention strategy that recognises that the layout and design of the built environment can create or reduce opportunities for criminal behaviour and disorder. It includes “controlling space so that users of an area develop a sense of ownership over it and other people are deterred from entering; limiting access and creating a perception of risk to the offender; and making the most of natural visibility or observation.”

Note: Bedfordshire Police DOCOs will also reference SBD Homes 2024, SBD Commercial 2023, SBD New Schools 2014, and other SBD guidance documents where appropriate.

Yours sincerely

[Redacted Signature]

[Redacted Name] **Lesley Johnson**

Designing Out Crime Officer