



**City of London Corporation**  
**City Plan 2040 — Examination in Public**  
**Matters Statement**

**Main Matter 11 – Safe and Secure City**  
**(Policies S2 and SA1 to SA3)**

## **Main Matter 11 – Safe and Secure City (Policies S2 and SA1 to SA3)**

- **Are the requirements for a Safe and Secure City set out in Policies S2 and SA1 to SA3 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in ‘general conformity’ with the London Plan?**

Yes, the requirements of the policies in the CP relating to safety and security (SA1, SA2, SA3 and paragraphs 3.11- 3.14.6) are justified by appropriate available evidence and have regard to national guidance, local context and the London Plan.

Paragraph 102 of the NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate.

LP policy D11 (part A) commits the Mayor 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. Policy D11 (part B) requires boroughs to work with relevant agencies 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.

Given the high degree of footfall in the City focussed at particular times of day; (see Matters Statement 16), and the presence of high-profile international organisations in the Square Mile, the safety of buildings and the public realm is of paramount importance. Safety from natural threats and the safety of individuals are also crucial aspects of delivering a safe and secure City, taking into consideration the built form of the Square Mile. Alongside this, it is important to maintain high standards of design in the City; (see Matters Statement 8), and to minimise impacts on the flow of people moving about the City. The City of London Police offer advice on design elements in developments, in line with Secured by Design principles, that can help ensure a safe and secure environment. These design elements include encouraging natural surveillance of public spaces, creating mixed use developments and ensuring appropriate access points, dispersal routes and lighting. Suicide prevention is an important safety issue in the City that is addressed in the design section of the CP (paragraph 9.5.2).

CP policy (SA3(1)) reflects NPPF and London Plan requirements by advising that security measures must be incorporated into the design of development at an early stage, taking account of ‘secured by design’ principles, while avoiding measures that would adversely impact on the public realm or the quality of design. CP policy (SA3(3)) states that where it is required, Hostile Vehicle Mitigation (HVM) should be integrated into the design of the building.

Good management is also crucial for delivering a safe and secure environment. CP policy (SA2) therefore states that applications for major commercial development and developments that propose night-time uses must include a management statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of all people and minimise the potential for over-crowding.

To respond to other potential threats, policy (SA2(4)) seeks to ensure that development proposals take account of the need for resilience so that residential and business communities are better prepared for, and better able to recover from, emergencies including fire, flood, weather, and other related hazards (see Matters Statement 13). Policy (SA2(5)) requires development proposals to meet the highest standards of fire safety.

CP policies (S2, SA1 to SA3) are expected to result in the delivery of development and public realm schemes that ensure the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism.

**● Are the requirements for a Safe and Secure City set out in Policies S2 and SA1 to SA3 positively prepared ‘in a way that is aspirational but deliverable’?**

Yes, the policies in the CP relating to safety and security are positively prepared in a way that is aspirational but deliverable. Safe and Secure strategic policy (S2) sets out a high-level vision for buildings and public realm to be safe and secure in terms of crime, fear of crime, antisocial behaviour and terrorism. This vision is clearly expressed through the practical advice in CP policies (SA1, SA2 and SA3) which require risk assessments and management and design and access statements to be produced, (para 3.13.5).

CP policies are expected to result in area-wide security measures to ensure that businesses, workers, residents and visitors in this high growth area are protected by implementing measures such as dispersal routes, emergency clearance in pedestrian areas and emergency planning procedures, as set out in policy (S2(3)).

The Safe and Secure policies are expected to result in the delivery of developments and public realm schemes that ensure the City is safe and secure.

**● Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?**

Yes, the policies in the CP are clearly defined and unambiguous and it is evident how a decision maker should react to development proposals. The City Corporation considers that strategic policy (S2) and policies (SA1, SA2 and SA3) are in accordance with Paragraph (16) of the NPPF,

which requires that they are ‘clearly written and unambiguous’ and drafted in such a manner that it is “...*evident how a decision maker should react to development proposals*’.

Policy (SA2) is supported by the City of London Police and the City Corporation as Licensing Authority, to help ensure that the measures contained in the management statement are appropriate to local circumstances e.g restricted licensing hours, regulation of servicing vehicles and issuing of table and chair licenses. Assessment of the management statements will have regard to the City of London Noise Strategy, the provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

CP policy (SA3) requires applicants to submit design and access statements, which are assessed by the City Police, and to contribute financially to on-site measures to deter hostile vehicles. The Safe and Secure policies are worded positively with the expectation that the required risk assessments and management and design and access statements will enable safe and secure developments with minimal disturbance to neighbouring properties.

The policies are positively worded and clearly separate the policy from the supporting text which is divided into ‘Reason for the policy’ and ‘How the policy works’, for maximum clarity.

It is clear where thresholds apply. Policy (SA1) requires major developments of 10,000 sqm or over to conduct and submit a full risk assessment and undertake early consultation with the City of London Police on risk mitigation measures.

Policy (SA2) requires applicants to produce management statements to ensure the quiet dispersal of patrons to minimise noise and disturbance to neighbouring occupiers.