

**Mole Valley Planning  
Pippbrook,  
Dorking, Surrey  
RH4 1SJ**



Your ref MO202502695

Our Ref: MO202502695/15714

Date: 14/01/2026

Contact Name: Mike Jones/  
Simon Evans

Dear Sherelle Munnis

**Re:** Planning Application MO202502695

Thank you for your correspondence of 02/12/2025 advising me of this application.

#### Description

Hybrid planning application for:

Swan Centre: Full details for proposed works to the Swan Shopping Centre including demolition of Leret House, reconfiguration of Units 1-4, Units 21-25 and 21 High Street to provide new commercial floorspace (flexible Class E/sui generis (drinking establishments)), cinema (sui generis) and new shopfronts and associated works.  
Bull Hill: Demolition of existing buildings. Full details of Access, western access road and associated highways works and 'Phase 1' comprising 276 residential dwellings (Class C3) in Blocks A-F and ground floor commercial/community floorspace (flexible Class E/Class F2) and associated works. All other matters reserved (Appearance, Landscaping, Layout and Scale) for residential dwellings (Class C3), commercial floorspace (Class E), multi-storey car parking, public park, play space and associated landscaping, parking and amenity and associated works. An Environmental Statement has been submitted in support of the application which, alongside the Swan Centre proposals, assesses the environmental effects of an illustrative masterplan for the proposed development at Bull Hill showing a total of 480 dwellings (including the detailed area), commercial floorspace (Class E) and multi-storey car parking in buildings of between 3 and 12 storeys in height, public park, play space and associated landscaping, parking and amenity space.

#### Location

LAND AT BULL HILL AND SWAN SHOPPING CENTRE  
LEATHERHEAD

I have had the opportunity to examine the detail within the application and have met with the Developer on two occasions. Whilst this was valuable it has not enabled me to fully assess security of these developments. The briefings from the Developer made no reference to the Swan Shopping Centre site, which we have not been able to assess and focused on Phase 1 of the Bull Hill site.

The references the Developer makes to Designing Out Crime in sections 2.6.3 and 3.8.6 in the Design Access Statement are to be applauded and include some of the comments we made at our meetings. However, there is no commitment to apply for Secured by Design certification and the document only says of the Bull Hill site that:

'In summary, the scheme adheres to and will incorporate SBD principles.'

Secured by Design is a detailed framework of standards that are published every year and need closely monitoring to ensure compliance.

For example, the Developer makes reference in the DAS to door security standards as PAS24 2016. This standard does not comply with Secured by Design, as this has been superseded by standard PAS24 2024.

The only way to ensure that SBD principles and standards are complied with is for the whole development at Bull Hill and the Swan Centre to be given a Secured by Design Gold planning condition.

Surrey Police wish to reduce the opportunity for crime and the fear of crime and anti-social behaviour and see safer, sustainable communities and buildings created.

A Secured by Design Gold planning condition would result in a Surrey Police DOCO being dedicated to this project from start to finish, with support from Counter Terrorism Security Advisors. It would enable further consultation to fully assess this project against the standards of Secured by Design, particularly with regard to the Multi Storey car park, Western Access Footpath/road and those buildings considered 'tall'. These standards are fully detailed in the following documents

[RESIDENTIAL GUIDE 2025 27325.pdf](#)

[NON RESIDENTIAL GUIDE 2025 3425.pdf](#)

### **Secured by Design**

SBD is a police-owned organisation, that works on behalf of the Police Service throughout the UK to deliver a wide range of crime prevention and demand reduction initiatives.

SBD plays a significant crime prevention role in the planning process to design out crime in a wide range of building sectors. It has achieved some significant success including one million homes built to SBD standards with reductions in crime of up to 87%. It supports the National Planning Policy Framework (NPPF) and underpins the above aims. The SBD scheme can be viewed at: [www.securedbydesign.com](http://www.securedbydesign.com)

SBD has many partner organisations, ranging from the Home Office, Ministry of Housing, Communities & Local Government and the Police Service, through to local authorities, housing associations, developers and manufacturers. SBD works closely with standards and certification bodies to ensure that their publicly available standards actually meet the needs of the police and public alike.

The police design out crime service is free of any charge, and a DOCO is available to meet the applicant again and take them through the SBD application process towards final certification on completion.

Mike Jones and Simon Evans

**Designing Out Crime Officer**

**Surrey Police**

In support of the above, I would cite:

**Mole Valley Local Plan: - Policy EN5 Section 6.46**

Extract – ‘The design and layout of the urban environment can have an influence on the occurrence of vandalism and street crime and good design has a role in promoting safer and more inclusive communities for everyone. A guiding principle should be that public spaces should be self-policing, so that crime is more difficult to commit and the risk of detection for potential offenders is increased. The layout and design of new development can play a significant part in crime prevention.’

**National Planning Policy Framework**

**Promoting healthy and safe communities:**

**Paragraph 91**

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.

**Achieving well-designed places:**

**Paragraph 127**

Planning policies and decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) 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.

**Violence against Women and Girls**

When designing private and public spaces it is important to consider the issue of Violence against Women and Girls. Please note the following recent recommendation from the [The Angiolini Inquiry](#)

**Recommendation 18: Increased use of police Designing Out Crime Officers in the prevention of sexually motivated crimes against women in public spaces**

By November 2026, the Government should explore how to improve the impact that the safety advice provided by police Designing Out Crime Officers could have on the prevention of sexually motivated crimes in public spaces, including by amendments to policies and changing their status within relevant planning legislation.

Please also note the following guidance on Safer Parks

<https://www.securedbydesign.com/about-us/news/making-parks-a-place-of-safety-for-everyone-new-guidance-paves-the-way-for-women-and-girls>

## **Tall Buildings Policy:**

Please also see the following, adapted from a submission from Police Crime Prevention Initiatives (CPS) to another Surrey Council:

### **Embedding Crime Prevention and Secured by Design in Tall Buildings Policy**

For the information of Planning Policy Teams,

Please consider the following in meeting national policy expectations for sustainable, inclusive, and safe developments, especially in the context of high-density and complex forms such as tall buildings.

#### **1. National Planning Policy Framework (NPPF)**

The National Planning Policy Framework (NPPF) defines three overarching objectives of sustainable development: economic, social, and environmental (paragraph 8). Crime and the fear of crime have a measurable impact on all three:

- Economically, crime leads to financial losses and higher insurance premiums.
- Socially, it undermines wellbeing, social cohesion, and confidence in public spaces.
- Environmentally, it affects the usability and quality of shared and green spaces.

Section 8 of the NPPF, *Promoting Healthy and Safe Communities*, is especially clear in its direction:

*“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.”*

Paragraph 102 of the NPPF further requires planning authorities to promote public safety and security by:

- Anticipating malicious threats;
- Drawing on the most up-to-date information from police and security agencies;
- Ensuring resilience through the design and layout of developments.

Tall buildings, often accommodating large numbers of people, require careful planning to ensure public safety, secure access, and robust surveillance. These considerations must not be treated as secondary but as integral to the planning process.

#### **2. The Role and Credibility of Secured by Design (SBD)**

Police Crime Prevention Initiatives (Police CPI) is a police-owned organisation operating on behalf of the UK Police Service to deliver effective crime prevention and security standards across a wide range of sectors. We work across industries to design out crime, reduce risk, and improve safety - from homes to public spaces, commercial sites to infrastructure.

Our mission: To embed crime prevention into everyday decision-making.

SBD promotes design interventions proven to reduce crime, anti-social behaviour, and vulnerability to terrorism. These include:

- Compartmentation of internal layouts to restrict unauthorised access between uses, floors, or units;
- Access control systems designed to regulate and monitor entry points for residents, staff, visitors, and service users;
- Natural surveillance achieved through thoughtful placement of windows, balconies, and active frontages;
- Appropriate lighting to support visibility and discourage offending;
- Clearly defined and defensible external space to create psychological and physical boundaries;

- High-security doorsets and windows, manufactured and tested to meet police preferred specifications\* (e.g. PAS 24, LPS 1175, etc.);
- Video surveillance systems (VSS) integrated within the layout and building fabric to support passive and active surveillance;
- Robust security for shared and vulnerable areas, including bin stores, cycle storage, plant rooms, and lift lobbies.

\* The term ‘police preferred specification’ refers to products, such as doorsets, windows, locks, and access control systems, that have been independently tested and certified to meet stringent security standards approved by Secured by Design.

Where there is a requirement for a doorset to be security, fire and smoke rated (e.g. flat or apartment entrance doorsets, doorsets aiding security compartmentation, or those required to meet building regulations, etc.) the manufacturer or fabricator supplying the finished product to site must present independent third-party certification from a single UKAS accredited certification body satisfying all performance elements. This requirement minimises the likelihood of doorsets being supplied in different configurations for separate security, fire, and smoke tests and subsequently misrepresented as a single compliant product. SBD recognises the importance of this integrated certification approach to ensure both security and life-safety performance are fully met.

SBD is referenced throughout national policy and guidance, including the NPPF, Building Regulations (Approved Document Q), and government-endorsed best practice documents. Its accreditation schemes (Homes and Commercial) provide a structured and measurable pathway to achieving secure, well-designed developments.

Further information and the full suite of SBD design guides are available at: [www.securedbydesign.com](http://www.securedbydesign.com)

### **3. National Design Guidance – Safety as a Core Design Principle**

The National Design Guide and National Model Design Code reinforce the NPPF’s emphasis on secure, resilient places:

- The National Design Guide outlines 10 characteristics of well-designed places, including *Public Spaces – safe, social and inclusive* and *Homes and Buildings – functional, healthy and sustainable*.
- Paragraph 105 states that “*careful planning and design create the right conditions for people to feel safe and secure, without the need for additional security measures*”, citing passive surveillance, active frontages, and early risk assessments.
- Paragraph 124 emphasises that safety, security, and comfort are essential components of quality of life and good design.

The **National Model Design Code** goes further:

- Paragraph 63 (Part 1) affirms that “*All schemes should aim to create a safe and secure environment and provide a sense of security for all users.*”
- Paragraphs 143–144 (Part 2) explicitly reference Secured by Design, recommending that local design codes support the inclusion of SBD standards for homes, commercial premises, and public spaces.
- Paragraph 146 highlights the importance of integrating counter-terrorism considerations into the design of buildings and public realm, advising early consultation with Designing Out Crime Officers (DOCOs) and Counter Terrorism Security Advisors (CTSAs).

### **4. Recommended for an SPD and Local Planning Process**

In light of the above, we recommend the following for a Tall Buildings SPD or the creation of an accompanying policy framework:

#### **a) Embed SBD in Design Standards**

The SPD should:

- Explicitly reference Secured by Design as the security benchmark for tall buildings;
- Reference the NPPF, National Design Guide, and National Model Design Code in relation to crime prevention and secure environments.

## **b) Strengthen Pre-Application and Submission Requirements**

DOCO engagement should be mandatory at the pre-application stage for all tall building proposals.

Planning applications should include:

- A site-specific security strategy addressing both physical and operational security measures across the development;
- Layouts for VSS and lighting, designed to ensure visibility and deter crime in public and semi-public areas;
- Access control and compartmentation diagrams, clearly defining secure zones, entry points, and movement restrictions;
- Specification of certified secure doorsets and windows (e.g. PAS 24, LPS 1175) to protect against forced entry;
- Details of secure bicycle storage with surveillance and controlled access;
- Provisions for vehicle parking areas incorporating appropriate security measures such as lighting, VSS, and physical barriers;
- Design and security features for bin stores, ensuring they are lockable, ventilated, and not positioned to allow unauthorised access to buildings;
- Secure and restricted access to plant rooms, with certified doorsets, alarm integration, and minimal external access points;
- Controlled access and visibility within lift lobbies, including integration with VSS, access control systems, and emergency communication facilities.

## **c) Incorporate a Planning Condition Requiring SBD Certification**

SBD is a nationally recognised police initiative which helps align planning with local policing strategies. Planning departments may set a Secured by Design planning condition to ensure that tall buildings are designed with crime prevention and community safety in mind.

An example of such a planning condition could be:

*Prior to the occupation of the development, the following shall be submitted to and approved in writing by the Local Planning Authority:*

- a) *A Secured by Design (SBD) Gold Certificate (Silver in exceptional circumstances); and*
- b) *A statement demonstrating how all parts of the scheme comply with the Secured by Design Homes or Commercial Guide.*

*The approved details must be implemented in full and retained thereafter.*

*Reason: To ensure that the development incorporates effective crime prevention measures that address the specific security challenges associated with tall buildings, including increased public access, shared internal spaces, and greater levels of occupancy and visibility. These measures are necessary to create a safe and secure environment for residents and users. This enables the Local Planning Authority to meet its duties under the Crime and Disorder Act 1998, comply with the Policy and Local Plan, and accord with national planning policy on designing out crime.*

Design and Access Statements should detail the security measures incorporated into the design of tall buildings to ensure that crime prevention measures are addressed from the outset and that developments meet nationally recognised security standards.

## 5. Conclusion

Embedding Secured by Design principles, involving DOCOs from the outset, and making security an explicit part of the design process will:

- Strengthen policy alignment with the NPPF, particularly in promoting safe, inclusive, and accessible places;
- Reduce crime and the fear of crime through thoughtful, evidence-based design and planning interventions;
- Promote long-term safety, sustainability, and resilience in new tall buildings and wider developments;
- Avoid costly retrofits and design conflicts by integrating crime prevention early in the planning process;
- Support faster and more efficient planning approvals by demonstrating compliance with recognised safety standards;
- Improve public confidence in the planning system by embedding safety and well-being in the built environment;
- Lower pressure on police and local services by reducing the incidence of crime and antisocial behaviour;
- Enhance the quality of life for end users by creating secure, welcoming, and well-managed places;
- Increase the marketability and long-term value of properties through improved safety credentials;
- Encourage community cohesion by supporting environments where residents feel safe, empowered, and connected.