



RTPI

mediation of space · making of place

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44(0)20 7929 9494
Fax +44(0)20 7929 9490

Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Registered Charity Numbers
England 262865
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

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The Crowded Places Team
Home Office
Office for Security and Counter-Terrorism
5th Floor Peel Building
2 Marsham Street
London SW1P 4DF

Email response sent to: CrowdedPlacesConsultation@homeoffice.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO CONSULTATION PAPERS: Working Together to Protect Crowded Places and Safer Places: A Counter Terrorism Supplement

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This document responds to the consultation documents **Working Together to Protect Crowded Places and Safer Places: A Counter Terrorism Supplement**.

The response has been formed drawing on the expertise of members including the RTPI Urban Design Network.

If you require any further assistance, please contact Nicola Gough, Network Manger on 0844 232 8083 or email network.manager@rtpi.org.uk.

Yours faithfully,

Matt Thomson
Head of Policy & Practice

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1.0 Working Together to Protect Crowded Places

Overview

The RTPI supports the intent and aspirations for a locally sensitive and proportionate response to the risk outlined in the document.

Delivery Framework

The RTPI believes that the approach based on national strategic framework, key stakeholders and potential contributions is appropriate. In addition, we believe that voluntary cooperation is appropriate. However, we also suggest that a 'fall back' mechanism may be required in the absence of reasonable cooperation and response.

The RTPI has concerns with regard to the "user pays" principle in multi user / owner environments. The Business Improvement District model will work in some but not all of these areas identified. We question what will be done in other areas to fund and secure necessary action.

We believe that this document sets out some good principles in terms of 'proportionate action.' However, we would suggest that these are not necessarily followed through in a proportionate fashion in the related Safer Places supplement.

Reducing the Vulnerability of Crowded Places

We agree that the arrangements set out in the guidance make it clear how local Counter-Terrorism Security Advisers (CTSAs) and local authorities should engage with businesses in order to encourage them to deliver the contributions they can make to reduce the vulnerabilities of crowded places. We don't believe that this is an area for RTPI advice.

Local Partnerships

We agree that local determination of lead local partner is appropriate. We also suggest that it may be appropriate for Government to issue something akin to 'Factors You Need to Consider' guidance to aid the process.

The Institute believes that local best practice should be gleaned and built into a categorised library accessible to local partnerships.

Impact Assessment

We believe that options 3(i) and (ii) are the most appropriate.

We would strongly advise against the use of legislation in this instance, as this approach will almost unavoidably be crude in being legally precise when we need capacity for subtly balancing interests and concerns.

Wider Observations

Risk Assessment

The RTPI believes that the risk assessment process should be broadened and layered to consider risks / vulnerabilities / key usage attributes which it is important to protect. This section could usefully reflect on the parallel in highway terms of the move from safety audits to quality audits.

The usage attributes should refer back to the Attributes of Safer Places key as set out in the Safer Places publication. We believe that the key is in proportionate balance between risks, vulnerability and usage attributes.

Engagement

The RTPI suggests that any approach to engagement should include engaging with the widest range of stakeholders at national to local levels to maximise information, inform the balancing process and increase the range of responses and spread ownership of the selected balances and responses.

Training

The Institute believes that well rounded training for participants would be beneficial in achieving the following:

- Understanding of strategic as well as detailed responses.
- Awareness / understanding of balancing factors.
- Broadening the response repertoires based on good practice and safeguarding against over intrusive responses.

Organisation of the Document

The RTPI suggests that the document would benefit from first clearly identifying and focusing on the intended audiences.

In addition, we suggest that the document consider and reflect upon the regimes for delivery. As an example, it would be useful to include detail on what can be delivered through the plan making policy process and what can be delivered through the development management process on an application by application approach. This would further be helped by good practice illustration at each level.

It would be also be helpful to produce a structure for those responsible for providing advice together with advice related to the status of varying observations, who is involved and how, their roles and responsibilities, and the refereeing of conflicts (both within and outside the planning system).

2.0 Safer Places: A Counter Terrorism Supplement

Overview

The RTPI suggests that as a supplement to Safer Places, this could be better linked back to the core document and it's espousing of attributes of Safer Places - where safety flows substantially from attractiveness and levels of use through day and evening. This could emphasise the core principles as still applying and then refining their application to retain them as fully as possible whilst responding to particular types of threat.

The following responds directly to the questions outlined in the consultation document:

Question 1: Proportionality -Will this guidance enable counter-terrorism design to be delivered through planning decisions at the local level which are proportionate to the risk?

As stated above, we believe that this could be tackled better (see observations above for detail)

Question 2: Does the content under section 1 adequately set out the nature of the threat and why designing in counter- terrorism measures are needed?

We believe it does – but we also suggest that the section needs to underline even more strongly the importance of minimising disruption to key usage and enjoyment attributes of places.

Question 3: Does this document provide sufficient information to persuade you of the importance to integrate counter-terrorism measures into new developments, including the public realm?

Yes.

Question 4: Does the guide adequately explain counter-terrorism and where it fits in the planning system?

No. We suggest that the guide needs clearer process and case study illustration of varying planning policy and development management dimensions.

Question 5: Does the document adequately reflect that counter terrorism is one of a number of issues considered within planning and that planning decisions often represent compromises between competing priorities?

Yes. But refer to early observations on scope of risk assessment and balancing process.

Question 6: Are the counter-terrorism design principles helpful and comprehensive?

We believe that the principles are reasonably helpful and comprehensive. However, we suggest that they could be better categorised with response ranges set against them.

Question 9: Annexes A and B – Do the annexes enable you to understand the range of technical counter-terrorism design measures that are available and might be needed to reduce the vulnerability to terrorist attack?

There is some disconnect between the precision here and the general principles in other parts of the document. We suggest better a more integrated approach is required in this section.

Question 10: Case Studies Annex F

The case studies are very helpful but could be enhanced to indicate risk assessment, vulnerability, usage attributes thinking and balancing process (if we can do this somehow without informing on un-safeguarded vulnerability).

Impact Assessment

The RTPI agrees with the need to safeguard places from potential terrorist attacks. However, we also believe it is vital is that whilst safeguarding places we minimise the extent to which people feel discouraged from using them because of the impact of the safeguarding measures on:

- Their ability to use and enjoy the place.
- Their perception of its safety.