



## Local Policing Support Team

Your Ref: AB/88/19/PL

Our Ref: NW/ARU/19/20A

Date 17<sup>th</sup> September 2019

Contact Name: Neville Wren

Dear Mr Castro-Parker

**RE: Land at Electrical Sub Station, Ford Road, Arundel. BN18 9DX**

Thank you for your correspondence of 20<sup>th</sup> August 2019, advising me of '38 No residential apartments (9 No 1-bed units & 29 No. 2-bed units) along with access, off-street parking, amenity space & enhancements to the local footpath network' at the above location, for which you seek advice from a crime prevention viewpoint.

I have had the opportunity to examine the detail within the application and in an attempt to reduce the opportunity for crime and the fear of crime I offer the following comments from a Secured by Design (SBD) perspective. SBD is owned by the UK Police service and supported by the Home Office that recommends a minimum standard of security using proven, tested and accredited products. Further details can be found on [www.securedbydesign.com](http://www.securedbydesign.com) within Homes 2019 document.

The National Planning Policy Framework demonstrates the government's 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. With the level of crime and anti-social behaviour in Arun district being below average when compared with the rest of Sussex, I have no major concerns with the proposals, however, additional measures to mitigate against any identified local crime trends and site specific requirements should be considered.

**Perimeter**

As the first line of defence, perimeter fencing must be adequate with vulnerable areas such as side and rear perimeters needing more robust defensive barriers by using walls or fencing to a minimum height of 1.8 metres. Including the electrical sub- station in Ford Road.

Mr R Castro-Parker  
Planning Officer  
Planning Control  
Arun District Council

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In circumstances that require a more open feature such as an amenity area overlooking a rear parking court or a rear garden pathway, 1.5metre high close board fencing topped with 300mm of trellis can achieve both security and surveillance requirements. This solution provides surveillance into an otherwise unobserved area and a security height of 1.8 metres. Gates that provide access to the side of the dwelling or rear access to gardens or amenity areas must be robustly constructed of timber, be the same height as the adjoining fence and be lockable from both sides. Such gates must be located on or as near to the front of the building line as possible.

It is important that the boundary between public space and private areas is clearly indicated. It is desirable for dwelling frontages to be open to view, so walls fences and hedges will need to be kept low or alternatively feature a combination (max height 1m) of wall, railings or timber picket fence.

### Entrance Doors

(Secured by Design Homes 2019 Paragraph 21.3) recommends all door sets allowing direct entry into the home, eg.- front and rear doors, interconnecting garage door sets, French doors , bi-fold or sliding patio doors sets , dedicated private flat or apartment entrance door sets, easily accessible balcony door sets (note 21.3 a) etc. shall be certified to one of the following standards PAS24:2016 (Note 21.3b applies) STS201 Issue 7:2015 (Note 21:3c) or LPS1175 Issue7.2:2014 SR2 +(note 21.3d) or LPS 1175 Issue8:2018 SRA3+ or STS202 Issue 6:2015 BR2 (note 21.3d) or LPS 2018 Issue 1.1:2016 SRB (Notes 21.3d and 21.3e)

Communal entrance doors sets with a separate adjacent access control panel are usually subject to greater use (and abuse) due to the number of dwellings served. Certification to one of the following standards can demonstrate that the door set has a more robust construction and is more able to withstand the day to day use in a communal application than a door tested to PAS 24:2016 or STS201.

I would recommend STS 202 or LPS1175 Issue 7 SR2. ( SBD Homes 2019 document chapter 27.14 refers).

(Paragraph 21.19 to 21.21 of SBD Homes 2019) refer to glazing within PAS24:2016 or STS201 Issue 4:2012 certified door sets, including glazed side panels/side lights adjacent to door sets installed within an integral door frame and windows adjacent to door sets (within 400mm) must incorporate one pane of laminated glass meeting, or exceeding the requirements of BS EN 356:2016 class P1A (Note21.9). NB This is a specific requirement within PAS24:2016, which is referenced within the UK Building Regulations (see paragraph1.1) and (Note 21.19).

### Window Glazing

(Chapters 22.12 to 22.15 of SBD Homes 2019) refers to specifications for laminated glass meeting the requirements of BS EN356:200 class P1A which is required in the following areas. Any window located within 400mm of a door set (to ensure integrity of the locking system). Easily accessible emergency egress windows with non- lockable hardware (a requirement of PAS24:2016) and easily accessible roof lights with non- lockable hardware.

I recommend all windows are capable of being locked and ground floor and easily accessible windows fitted with window restrictors to allow the windows to be opened from the internal side, but deter easy access through them from the outside.( With the exception of emergency egress windows ).

(SBD Homes 2019 Paragraphs 21.5 to 21.8) refers to glazing in adjacent door sets, including fire rated door sets.

### Access Control

If the two block of 19 dwellings each are treated individually (Chapter 27:20 to 27.23 of SBD Homes 2019) recommends that smaller developments containing up to 25 dwellings or bedrooms shall have a visitor door entry system. The technology by which the visitor door entry system operates is a matter of consumer choice, however it should provide the following attributes:

Access to the building via the use of a security encrypted electronic key (eg, fob, card or key. mobile device etc.

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Vandal resistant external door entry panel with linked camera;

Ability to release the primary entrance door set from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation)

Remote release of the primary entrance door set from the dwelling or bedroom.

Live audio and visual communication between the occupant and visitor.

Ability to recover from power failure instantaneously;

Control equipment to be located in a secure area within the premises covered by the CCTV system and contained within a lockable steel cabinet to LPS1175 SR1 or STS202 BR1.

Developers and installers of visitor door entry systems and access control systems should be aware that UL 293 provides reassurance that a system has been assessed against a prescribed security test regime.

Trades persons release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

Installed electronic release hardware must form part of the certified door set range.

SBD recommends the use of colour monitors over black and white as it assists in definition, identification and identification of clothing.

(If treated as a single development of 38 dwellings then (SBD document 'Homes 2019' Paragraphs 27.24 to 27.28) recommends specifications for larger developments containing more than 25 flats, apartments, bedsits or bedrooms which will require an access control system as specified ).

#### Compartmentalisation

I refer the applicant to Para 27.29 to 27.35 of SBD Homes 2019 in respect of compartmentalisation of each block.

I recommend that compartmentalisation should be 'considered' to protect the amenity of residents. This will control the access from the central core lift and stairwells where each resident is assigned access to the floor on which their dwelling is located via the use of a proximity reader, swipe card or key or door sets on each landing and can prevent unauthorised access to the corridor where their flat is located.

In particular it will also restrict access to the lift and stairwells from the lobbies to use by residents only, to reduce the risk of anti-social behaviour.

#### Individual Dwelling Doors

Individual dwelling doors should meet (PAS24-2013) requirements and be fitted with automatic door closers, a door viewer, door chain or stop and two hinge bolts to deter unauthorised entry.

#### Fire Doors

Any fire doors should be devoid of external door furniture and be fitted with an alarm with remote access to enable residents to be alerted that the door has been opened.

#### Lightweight Framed Walls

The security of a development can be severely compromised if lightweight framed walls do not offer sufficient resilience to withstand a criminal attack (SBD Homes Para's 48.1 and Chapter 24 provide recommendations for wall systems).

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### Postal Arrangements

I recommend the postal arrangements for the flats is through the wall, external or lobby mounted secure post boxes. I strongly urge the applicant not to consider letter apertures within the flats' front doors. The absence of the letter aperture removes the opportunity for lock manipulation, fishing and arson attack and has the potential to reduce unnecessary access to the block.

### Internal Lighting

I refer the applicant to (Chapter 33 of SBD Homes 2019 Para 33.2) regarding internal lighting to communal parts of the dwellings. The lobbies, lift well and internal foyers, stair wells, stair cases and corridors should be fitted with 24 hour movement activated switched lighting. In critical movement areas, such as lobbies corridors and staircases, the use of two stage lighting (a constant low level lighting level supplemented but activity switched lighting mode) may be utilized to provide safety and security.

### External Lighting

(SBD Homes 2019 Para 33.1) provides recommendations for external lighting which should be vandal resistant.

### Cycle Storage

I note that both lower ground floors of the two developments have cycle storage areas.

I recommend that the secure cycle stores have vandal resistant PIR lighting installed internally and that the front doors on each are lockable. A mechanical push button type of lock would be acceptable or a Sold Secure Silver hasp, staple & padlock. Given that the proposed cycle store on the north east block has double doors, a door closer is to be fitted along with spring loaded automatic shoot bolts to the unlocked door to ensure it closes first. This arrangement would work very well for the refuse store as well. As a minimum, cycle storage should be Sheffield hoop style stands of galvanised steel bar construction of at least 3mm thickness or secure cycle racking bolted to the floor and meeting Silver Standard 'Sold Secure Specification, and fit for purpose. I would recommend that the internal side of the door is fitted with a thumb turn release or similar release mechanism to allow persons to open the door from inside in case of accidentally becoming locked in.

The arrangement for lighting and door security would work equally as well for the double doors of the bins stores on each block.

### Refuse Bin Storage

The refuse store on the north western corner of the development has a metal grill exposed to the road side of the development. If the spaces between steel mesh or steel bars are sufficiently wide it may attract litter and be vulnerable to arson. Any aromas or fumes from the refuse store may drift up to the balcony of the flat above.

### Court Yard, Car Port and Under Croft Car Parking

I have concerns regarding the vehicle entrance to the car park from the access road.

The double doors to the refuse stores on either side open onto the passageway for vehicles. At bin collection times this may cause conflict with the doors being open and vehicles driving through as the doors extend into the passage. It may also cause injury to the refuse operatives. The double doors should either be able to swing right back to an open position against the outer walls or be protected with bollards.

If the vehicle passage into the car parking area is also to be used by pedestrians, there should be a clear demarcation route for the pedestrians, such as well-defined surface paint markings.

The vehicle entrance has no security gate and so unauthorised access can be gained by members of the public at any time to parked residents' vehicles within the courtyard and under croft areas.

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(SBD Homes 2019 Para 16.30 discourages ungated court yard areas, and Para 16.4 recommends they must be protected by a gate.

Consideration should be given to clear warning signage indicating private use of the court yard parking areas.

Where communal parking occurs it is important that they must be within view of an active room within the property. An active room is where there is direct and visual connection between the room and the street or the car parking area. Such visual connections can be expected from rooms such as kitchens and living rooms, but not from bedrooms and bathrooms. Gable ended windows can assist in providing observation over an otherwise unobserved area.

The car parking areas, car port and undercroft must be illuminated. I would suggest dusk to dawn LED vandal resistant energy efficient lighting.

I would also ask you to note that Sussex Police is now exploring the impact of growth on the provision of policing infrastructure over the coming years and further comment on this application may be made by our Joint Commercial Planning Manager.

The Crime & Disorder Act 1998 heightens the importance of taking crime prevention into account when planning decisions are made. Section 17 of the Act places a clear duty on both police and local authorities to exercise their various functions with due regard to the likely effect on the prevention of crime and disorder. You are asked to accord due weight to the advice offered in this letter which would demonstrate your authority's commitment to work in partnership and comply with the spirit of The Crime & Disorder Act.

Yours sincerely



**Neville Wren**  
**Designing Out Crime Officer**  
**Sussex Police Headquarters**

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