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Local Policing Supporting Team

Your Ref BE/1/19/DOC

Our Ref: NW/ARU/19/04A

Date: 21st February 2019

Contact Name: Neville Wren

Dear Mr Easton

RE Land at Saltbox West of Shripney Road Bognor Regis PO22 9NW

Thank you for your correspondence of 15th February 2019 regarding 'Approval of details reserved by condition imposed under ref BE/102/17/OUT relating to Condition No 17, CCTV. Condition No 19, acoustic barriers. Condition No 21 external lighting and Condition No 22 Broadband for which you seek advice from a crime prevention viewpoint.

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 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 should be considered.

I direct my comments solely from a crime prevention viewpoint and I direct the applicant or their agent to our website at www.securedbydesign.com where SBD Homes 2016 document can be found. The Secured by Design scheme is a Police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice given in this guide has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments.

Condition 28 of BE/102/17/OUT states 'Prior to the commencement of development of any building a CCTV strategy for that building (to include details of the location cameras and type of system) shall be submitted to and approved in writing by the Local Planning Authority. The agreed details shall be implemented prior to first occupation of that phase and be retained and maintained as such thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of public safety in accordance with adopted Arun Local Plan Policy GEN 7.

I have no concerns regarding the approval of conditions, regarding lighting, security fencing or acoustic fencing, but add the following comments.

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Planning Control
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CCTV.

I refer the applicant to Chapter 49:1 to 49:10 of Secured by Design document (Commercial Developments 2015) found at www.securedbydesign.com which gives advice regarding the installation and management of CCTV systems within a commercial or industrial development.

It recommends that a set of Operational Requirements is created? This will enable the CCTV system to be used to its best ability ensuring that it is fit for purpose. Details on how to set up a set of O.R.'s can be found on the Home Office website; see CCTV Operational Requirements Manual 2009.

The development of an Operational Requirement Statement is essential; this document is unique to each system and will be used for the design and performance specification of the system. It is a statement of problems, not solutions, highlighting areas covered by the system and the times and description of activities giving cause for concern.

The websites below also provide information regarding setting up and managing a CCTV system.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/378449/09-05-UK-Police-Requireme22835.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/378443/28_09_CCTV_OR_Manual2835.pdf

<https://www.gov.uk/government/collections/surveillance-camera-guidance-tools-and-templates>

<https://ico.org.uk/for-organisations/resources-and-support/data-protection-self-assessment/cctv-checklist/>

Consideration should be given to any potential CCTV ensuring that the lighting is commensurate with the CCTV equipment.

The submitted plan for installing CCTV has been provided by a professional CCTV installation company and should meet the needs of the development around the warehouse.

The CCTV cameras must cover the entrances and exits to the building and perimeter fencing and be able to identify registration plates of vehicles. They must be positioned so that sunlight does not flare the camera's which must have a maintenance program in place to ensure they operate to their best efficiency.

Care must be taken in choosing the right type of CCTV cameras. Fixed camera's can sometimes be more effective than PTZ CCTV cameras, which can rotate, and when an incident occurs, be pointing in the wrong direction at that time.

The links above give information regarding the lawful use of CCTV cameras and storage of images.

Acoustic Fencing

Regarding acoustic fencing located on the north east boundary of Unit 2, I make the following comments

From a crime prevention viewpoint the acoustic fencing can help provide a layer of security if combined with other security measures. It can deprive visibility to sensitive areas as well as reduce sound levels and provide a physical barrier, but can also deprive causal observation of an area by members of the public and staff, which must be accounted for by other means.

I recommend the acoustic fencing is fit for purpose and as far as possible designed to deter any attempt to climb it by providing no areas to gain a foothold, or to break through it due to a flimsy structure or weak material or by climb under it.

Acoustic fencing is primarily designed to reduce noise from travelling from area to area, and not necessarily designed for security. However when built to 4.00 metres in height most fencing will offer a degree of security, especially against climbing over, providing there are no aids to assist climbing on the attack side which would assist unauthorised access, such as horizontal cross bars or Arris rails that may provide footholds.

SBD Commercial Developments 2015 document Chapter 43.13 advises the top of timber fences should be finished flush with neighbouring posts and a securely fixed capping rail should run across the top of the fence to create a continuous chain to deter climbing over.

Chapter 43:14 requires all timber employed in the manufacture of the fencing should be fit for purpose from FSC certified sustainable sources and be treated to provide protection against all types of rot and insect infestation for a minimum of 15 years and may need regular program of maintenance .

Fencing must be securely fitted to vertical support posts, to withstand weather conditions and with fittings that are resistant to attack.

Security Fencing

Security Fencing should be a minimum height of 1.8m and be capable of being raked or stepped to maintain height over different ground levels without creating gaps underneath. It is normally preferable that the perimeter fencing allows a clear view over the commercial buildings and grounds from the surrounding buildings and land.

SBD Commercial Developments 2015 Chapters 43 to 43:18 provide further advice regarding security fencing, with Chapter 44.2 to 44.3 giving advice regarding gates.

Security fencing specifications can vary in regard to resistance to attack, and I would recommend a certificated weldmesh fence, which also allows observation of the site, but will resist intrusion.

Security Gates

Security Gates should be the same specification as the fence that they are fitted to, and of the same height and similar style. It should not be possible to lift the gates off their hinges and both hinges and locks should be protected in such a way as to prevent their use for climbing. It should also not be possible to pass under the gates when in the closed position.

Gates that are installed with locks that operate remotely must form part of the manufacturers certified range.

Chapter 44.2 refers to standards required when used for the purpose of preventing access into a fire path to the side or rear of an industrial warehouse, and should be certified to either LPS1175 Issue 7 SR or STS202 Issue BR2.

External Lighting

External Lighting must conform to BS5489 -1:2013, which has been referred too within the lighting plan submitted along with other technical specifications. SBD Commercial Developments 2015 Chapter 48 gives recommendations regarding lighting requirements. Lighting should be carefully used to illuminate entrances and vulnerable areas and be commensurate with the CCTV system used.

Technical Services

Where technical services and utilities have underground cable runs, lines and cables should enter buildings below ground and be protected by secure access covers certificated to a minimum specification of LPS1175 SR 3 or STS 202 BR3.

In addition to good physical security and CCTV I would recommend that businesses consider installing intruder alarm systems where they consider valuable stock and equipment needs additional protection.

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.

This letter has been copied to the applicant or their agent who is asked to note that the above comments may be a material consideration in the determination of the application but may not necessarily be acceptable to the Local Planning Authority. It is recommended, therefore, that before making any amendments to the application, the applicant or their agent first discuss these comments with the Local Planning Authority.

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.

Yours sincerely



Neville Wren
Designing Out Crime Officer
Sussex Police Headquarters

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