



From: [REDACTED]
Sent: 23 November 2018 12:21
To: Planning.Responses
Subject: BR/270/18/PL 18 -20 London Road , Bognor Regis PO21 1PY

Dear Mr Davis

Please find attached, my recommendations regarding the above planning application.

Regards

Neville Wren | Designing Out Crime Officer
Sussex Police Headquarters | Amberley Block
Church Lane | Lewes | East Sussex | BN7 2DZ
[REDACTED]

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Local Policing Supporting Team

Your Ref: BR/270/18/PL

Our Ref: NW/ARU/18/16A

Date: 20th November.2018

Contact Name: Neville Wren

Tel: 101 ext: 540137

Mobile No: 07789-902818

Dear Mr Davis,

RE 18-20 London Road Bognor Regis PO21 1PY

Thank you for your correspondence of 5th November 2018, advising me of a Part conversion & extension of existing building to provide 6 No. additional storeys over existing rooftop to provide up to 104 No. student residential units with access from Bedford Street, associated servicing & ancillary accommodation, entrance & new internal stairs to existing building to provide access from Bedford Street. This application may affect the setting of listed buildings & the character & appearance of nearby conservation areas. 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 have had the opportunity to examine the detail within the application and make the following comments

I direct my comments solely from a crime prevention viewpoint and I direct the application 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.

Entrance Doors

I would recommend that all communal entrance doors to the student accommodation meet the requirements of, LPS 1175 Issue 7 SR:2 or STS 202 BR2 with controlled access and have remote release of the primary entrance door set. Door sets that are fitted with electronic locks or electronic staples must form part of the manufacturers certified range of door sets. This will include access doors into the accommodation from the podium level, as there is access to that level via the external fire escape from the roof terrace and ground level.

Mr S Davis
Planning Officer
Planning Control
Arun District Council

Sussex Police Headquarters
Mailing House, Mailing, Lewes, East Sussex, BN7 2DZ

Windows & Glazing

Any easily accessible windows within the residential parts of each block should conform to one of the following specifications. PAS24:2016, STS204 Issue 4:2012 or LPS1175:Issue 7.2:SR1 (Easily accessible is defined within Building Regulations Document Q Appendix A as: A window or door set, any part of which is within 2 metres of an accessible level surface such as a ground floor or basement level or an access balcony.)

Laminated glass meeting the requirements of BS EN356:2000 class P1A (minimum) is required where any window is located within 400mm of a door set, to ensure integrity of the locking system, including. Easily accessible emergency egress windows with non-locking hardware and easily accessible roof lights with non-locking hardware.

Access Control System

SBD document 'Homes 2016' Paragraph 27.8 recommends that larger developments containing more than 25 dwelling or bedrooms shall have an access control system. The technology by which the access control system operates is outlined within UL 293, however it should provide the following attributes:

- Access to the building via use of a restricted electronic key fob, card or key
- Vandal resistant external door entry panel with an integral camera (27.8a)
- Remote release of the primary entrance door set from the dwelling or bedroom (27.8b)
- Audio/visual communication between the occupant and the visitor (27.8a)
- Capture (record) images in colour of people using the door entry panel
- Battery back-up facility of the resident entry features of the system in the event of a power failure for up to 6 hours (27.8c)
- Unrestricted egress from the building should be afforded to the user in the event of an emergency or power failure.
- Every event of the entry system both visitor and resident should be recorded and stored for 30 days.
- SBD recommends the use of colour monitors to enable the occupier of the dwelling or bedroom to assist with the identification of the visitor to accurately describe the colour of clothing to the police in cases of antisocial behaviour or other misuse.

Compartmentalisation

In order to create a safe and secure communal environment for residents occupying blocks of multiple flats, bedsits or bedrooms, to reduce the opportunity for antisocial behaviour by restricting access to all areas and floors of the building to all residents, SBD asks for compartmentalisation .

SBD seeks to curtail unlawful free movement throughout the building through the use of an access control system (compartmentalisation). The application of such is a matter for the specifier, but may be achieved by either, or a combination, of the following:

- Controlled lift access – 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 (Note 27.9). Fire egress stairwells should also be controlled on each floor, from the stairwell into communal corridors, to reduce the risk of them being used for anti-social behaviour or criminal activities.

- Dedicated door-sets on each landing preventing unauthorised access to the corridor from the stairwell and lift; each resident being assigned access to the floor on which their dwelling is located.

I would recommend a single door leaf for each control door to the student bedroom access corridors, as one and a half leaf doors are notoriously difficult to secure and not acceptable.

The reason being that, should the leaf be unlocked and not secured correctly, the door will not have anything to be secured to, as there is effectively no frame between the door and leaf. (In its correct closed position the leaf is secured with shoot bolts) With the door and leaf closed together (without the leaf being secured) there is no indication that the leaf is insecure until entry is gained by pulling on the handle.

I would also question how a disabled wheel chair occupant would open a one and a half leaf door if it is necessary for access as it requires releasing the top and bottom shoot bolts on the smaller leaf.

SBD Homes 2016 Annexe A paragraph A2.1 requires each communal unit not to exceed 8 bedrooms off the communal corridor.

If a shared student corridor has no more than 8 bedrooms within it, the corridor will require a certificated controlled access door to PAS 024:2016 or its equivalent. Each bedroom within the corridor must have a FD30 front door with door lock certified to BS8621 or PAS 8621 with two hinge bolts, a door security chain or door stop and door viewer.

Bedroom Wall structure

SBD (Homes2016) document Section 2a Paragraph's 24:1, and Annex A, paragraph A3.1 give specifications in regard to light weight prefabricated walls. In respect of the party walls it is expected the wall construction will be of a robust nature and satisfactorily sound proofed, with intrusion resistance to the party walls and corridors.

Lighting

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 should be fitted to every entrance giving access to the building. I recommend, using low energy LED vandal resistant dusk to dawn switched lighting. External lighting throughout the development will be an important consideration and should conform to the recommendations within BS5489:2013.

Fire escapes

Fire exits should be free of external door furniture, alarmed and with warning signs regarding improper use fitted on or nearby.

External fire escape stairs must also be illuminated with dusk to dawn energy efficient lighting.

Privacy

Bedrooms 121,123, and 125 face onto the Podium Courtyard and should be provided with a degree of privacy and private space by suitable planting or alternatively a barrier to deter persons being close to the windows. The court yard should be illuminated with switched vandal resistant 'controlled lighting' to enable it to be reduced or extinguished at appropriate times during the hours of darkness.

Internal Services

I am pleased to note the location of the office and post room located on the Store First floor, which removes the need for letter apertures within the flat doors. Postal deliveries will be made Monday to Friday 9.00am to 5.00pm. Arrangements must be made to control other external services access to this level, to prevent further unauthorized access into the dwelling areas. I note the application will include a live in student warden.

Bicycle Store

I recommend the internal bike store on the Store First floor level must be fitted with a secure door meeting specifications of either LPS 1175 Issue 7 SR:2 or STS 202 Issue 3:BR2, with controlled access. These specifications will better cater for the hard use of bicycles being constantly pushed through and knocked against it. The bike store should only be accessible by residents and the locking system must be operable from the inner face by using a thumb turn to ensure residents are not accidentally locked in.

The cycle store should be segregated into individual secure compartments containing no more than 30 cycles in each. This helps reduce the unlawful removal of bicycles, parts and equipment, with access restricted to each section which should also have access control.

The cycle store must also be illuminated with low level variable lighting to allow a view into the room before accessing it and then with movement activated lighting to illuminate the room fully on entry. The entry door should have a small glazed panel to allow a view into the store before entry.

SBD Homes 2016 document, paragraph 53.4 and paragraph 54 gives further information regarding cycle racks and secure anchorages specifications.

Bin Store. Plant Room and Cleaners Cupboards

The double doors to the internal refuse bin store from the lobby should be fit for purpose with access control with internal release (such as a thumb turn) to prevent anyone becoming trapped within the room, as there is no other means of escape. Double doors should have an automatic door closer fitted, along with spring loaded automatic shoot bolts to the unlocked door to ensure it closes first. Lighting must comply as per the requirements for the bike store above.

The cleaner's cupboards should also have access control to prevent unauthorized access to equipment, cleaning products and chemicals.

I note there is no facility for the storage of a disabled buggy, either internally or externally.

The plant room must have controlled access and a fit for purpose door. Access must be restricted to authorized persons only.

CCTV

I would recommend CCTV to cover all entrances including the external steel fire escape staircase. They can then be monitored from the office or remotely.

I recommend 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.

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

Further details regarding CCTV and Data Protection can also be found at the Information Commissioners Office website at <https://icosearch.ico.org.uk/s/search.html?query=CCTV&collection=ico-meta&profile=default>

I note Bedford Street has a one way system for traffic travelling towards the High Street. There are disabled parking bays opposite the proposed student entrance and Morrison's car park also located on its west side.

The road is illuminated by street lighting.

I am pleased to see a pedestrian safety rail is intended to be located outside the student entrance.

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.

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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