



Local Policing Support Team

Your Ref: BR/282/19/PL

Our Ref: NW/ARU/19/26A

Date 5th November 2019

Dear Mrs Johnson,

RE: The Beach Hotel, former Mud Club, and 2-4 Waterloo Square Bognor Regis PO21 1SU

Thank you for your correspondence of 12th November 2019, advising me of the 'Redevelopment into 49 No Apartments consisting of 24 No1 & 25 No 2 bed apartments & 2 commercial units (A3 Restaurant & Café). This application affects the character 7 appearance of The Steyne, Bognor Regis Conservation Area & may affect the setting of a listed building.' 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.

I direct the application or their agent to our website at www.securedbydesign.com where (SBD Homes 2019 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.

Within the website (SBD Commercial Development 2015) document can also be found. This is a comprehensive document that encapsulates both commercial developments where the public have no formal access, e.g. factory or office buildings, and those where public access is integral to the commercial use such as retail premises, leisure centres and public buildings. This will be able to provide the applicant with in-depth advice pertinent to the design and layout.

Mrs D Johnson
Planning Officer
Planning Control
Arun District Council

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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.

Accredited products that are fit for purpose and appropriate along with natural surveillance, access control will assist the development in creating a safe and secure environment in which partake in leisure and retail activities.

This is a large and complex development incorporating residential, and commercial aspects together with an underground car park, to which I have referred below.

The boundary between public space, commercial units and private areas should be clearly indicated and prevent unauthorised access to private living accommodation with good access control.

The development should reflect the attributes of safe, sustainable places as set out in Safer Places – The Planning System and Crime Prevention. These are:-

(Access and movement - places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security). (Structure - places that are structured so that different uses do not cause conflict). (Surveillance - places where all publicly accessible spaces are overlooked). (Ownership - places that promote a sense of ownership, respect, territorial responsibility and community). (Physical protection - places that include necessary, well designed security features). (Activity - places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times). (Management and maintenance - places that are designed with management and maintenance in mind, to discourage crime in the present and the future).

Ground Floor Commercial Development.

There are two large commercial units on the ground floor. Each of them have a front and rear access.

On the Waterloo Square elevation there is a further residential access door to the dwellings located between the front commercial entrance doors to each unit. At the rear of the units there are two further rear access doors which open on to Norfolk Street and a loading bay area. These doors are also located between additional utility rooms for the residential units.

(SBD Commercial Developments 2015 document Chapter 56:1) refers to external door set aperture standards for commercial buildings where there is an expectation that the security will be required to meet the following minimum standards when the building is unoccupied. (PAS 24:2016), or (LPS 1175 Issue 7 Security Rating 2), Or (STS 201), or (STS 202 Issue 3 BR2).

In view of the location with its beach front location, late night economy and busy holiday seasons, I would recommend all the doors meet one of the higher specifications such as (LPS1175 Issue 7 SR2).

(Para 56.2) also refers to 'door set product' specifications for the doors which must be fit for purpose.

There is a danger that double outward opening doors do not get secured properly and so the second leaf cannot lock to the first leaf correctly, providing an opportunity for unauthorised access as the doors may be pulled open. All external access doors to the commercial unit are double doors, which I recommend have spring loaded drop bolts at the top and bottom of the leaf that closes first, plus automatic door closers which then provides a solid structure for the second leaf to lock to when the drop bolts are locked in position.

(When the commercial units are occupied only the one entrance door of each unit should be used when the shops are open, to deter shop lifting and escaping or entering via the back doors if left insecure).

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Glazing

I refer the applicant to Commercial Developments 2015 (Chapter 58 regarding glazing within door sets), (Chapter 60 regarding security glazing) and (Chapter 62 regarding protection of window apertures).

All ground floor and easily accessible windows shall be certified to BS 356:2000 resistance class P1A. 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.)

Walls

Walls of the commercial developments should be designed to withstand criminal attack through them, with materials resistant to manual attack or damage to ensure initial provision of security. This should include adjoining party walls with other separate units.

Each of the commercial units should also consider the installation of an intruder alarm system and CCTV.

Any fire doors should be devoid of external door furniture and be fitted with an alarm with remote access to enable staff to be alerted that the door has been opened. Signage adjacent to the door is to inform users of the consequences of misuse.

Other than a loading and delivery area I note there is no provision of any staff parking spaces for the commercial units.

Intruder Alarm and CCTV

I recommend that each of the commercial units are fitted with an intruder alarm and consideration given to the fitting of CCTV to monitor the entrance doors and till areas for the safety of staff and deterring crime.

Residential Apartments.

Doors

(Secured by Design Homes 2019) recommends all door sets allowing direct entry into the home, eg.- front and rear doors, interconnecting garage door sets (see para 21.3) French doors , bi-fold or sliding patio doors sets , dedicated private flat or apartment entrance door sets, easily accessible balcony door sets (note 21.1a) etc. shall be certified to one of the following standards :-

PAS24:2016 (Note 21.1b applies) STS201 Issue 4:2012 (Note 21:1c) or LPS1175 Issue7.2 SR2 (note 21.1d) or STS202 Issue 3 BR2 (note 21.1d))

External front entrance doors and door sets that gives access via a corridor to the lobby, will be required to provide security and durability over a long period of heavy use.

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 Issue 6:2015 BR2) or (LPS1175 Issue 7.2:2014.SR2+), (SBD Homes 2019 document chapter 27.14 refers)

Where there is a requirement for a door set to be both fire rated and security rated I refer the applicant to (Para 21.5 to 21.8 SBD Homes 2019).

Door sets that are fitted with electronic locks or electronic staples must form part of the manufacturers certified range of door sets.

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(SBD Homes Para 21.19 to 21.21) provides recommendations regarding glazing in adjacent door sets and Para 22.1 to 22.13 provides recommendations and specifications for all easily accessible windows within the dwellings.

External door sets that are hidden from public view should not be recessed by more than 600mm (such as side or back doors).

Apartment Doors

SBD recommends doors to individual apartments should be a minimum certification of PAS24:2016, be fitted with a minimum of two hinge bolts or with similar integral facility to ensure protection in the event of a hinge failure following a criminal attack.

The door should also be fitted with a door safety chain or stop and door viewer to enable residents to see visitors before opening the door.

Windows in Doors

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) which must incorporate one pane of laminated glass meeting, or exceeding the requirements of BS EN 356:2016 class P1A (Note 21.9). NB This is a specific requirement within PAS24:2016, which is referenced within the UK Building Regulations (see paragraph 1.1) and (Note 21.19)

(Chapters 22.12 to 22.15 of SBD Homes 2019) also refers to specifications for laminated glass meeting the requirements of BS EN 356:200 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.

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

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.)

Communal Door Entry Systems

(SBD document 'Homes 2019' Paragraphs 27.24 to 27.28) recommends that larger developments containing more than 25 flats, apartments, bedsits or bedrooms shall have an access control system and lists requirements and specifications.

Compartmentalisation

It is recognized that within large 'residential' developments incorporating multiple flats or bedrooms there can be issues with anti-social behavior and crime.

Secured by Design (Homes 2019) recommends that (Compartmentalisation) is important to prevent unauthorized access to private accommodation. (Chapter 27.29 of SBD (Homes 2019) document refers.

From a crime prevention viewpoint I recommend that compartmentalisation is to be considered to protect the amenity of residents. This will control the access from the central core lifts and stairwells where each resident is assigned access to the floor on which their room 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 room is located.

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(The application of such a scheme is a matter for the specifier!).

SBD recommends no more than 25 flats should be accessed via either of the access control methods above. This means that no more than 25 flats should be accessible from the compartmentalised point. If you have a controlled door from the stairwell only 25 flats are to be accessible from it.

Basically it is saying SBD wants to remove free access throughout the building for all residents (or visitors or tailgaters) in order to reduce crime and incidents of anti-social-behaviour and the statement above suggests the best way to do it.

For the safety of the residents, where there are compartmentalised corridor doors, these are to be at least partially glazed in order to provide observation from either direction when moving through the development. All corridor doors should have automatic door closers.

Lightweight Walling

To withstand a criminal attack, SBD Homes 2019 requires light weight walling systems, if being used to construct bedrooms in residential buildings containing multiple bedrooms or dwellings, to meet the requirements of Chapter 24.

Fire Doors

Any fire doors should be devoid of external door furniture and be fitted with an alarm with remote access to enable residents or staff to be alerted that the door has been opened and accompanied by appropriate warning signage for improper use.

Internal Lighting

Lobbies, lift wells and internal foyers, stair wells, stair cases and corridors should be fitted with movement activated switched lighting. In critical movement areas, such as lobbies corridors, the underground parking area 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

Lighting is required to each elevation that contains a door set. All entrances to which the public and staff have access to the building should be illuminated. Research has proven that a constant level of illumination is more effective at controlling the night environment. Dusk to dawn LED low energy use lighting may be suitable. Where possible external lighting should comply with the specifications within (BS5489:1-2013)

Café/Bar

I note that the plans indicate a ground floor café/bar. Depending on the final requirements by the occupier I ask that should there be any alcohol sales involved at a later stage, the applicant liaises with Sussex Police Licensing Team to discuss potential plans and requirements.

Car Parking

Door sets providing alternative access to communal areas (other than primary shared or communal access door set) including emergency egress door sets.

I note there is provision for 22 car parking spaces within the underground car park. Where door sets provide access to and emergency egress from an underground car park, they must meet the requirements of Part B and Part Q of the Building Regulations. (England). In practise this provides a dilemma as the performance requirements for the two Building Regulations can be diametrically opposed to one another and problematic if not dealt with at the early design stage. SBD (Homes 2019 Para's 31.3 to 31.8) provide specifications and recommendations as an alternative design solution for just such a scenario.

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Underground Car Park

I note (drawing number 18.103.202) indicates a waiting space and traffic light position to be located at the entrance to the underground car park. However there is no indication of the security to protect the entrance. This area of the town is highly likely to be well used during the summer months in particular and the vehicles and their owners using the underground car park potential targets for crime as they are out of view and isolated.

Where a development incorporates an underground car parking facility, the following security enhancements are required which require an access control system for all vehicular and pedestrian entrances to prevent unauthorised access into the car park by either vehicles or on foot.

Inward opening automatic gates or roller grilles must be located at the building line or at the top of the ramps to avoid the creation of a recess. They must be capable of being operated remotely by the driver sitting in the vehicle. (Chapter 55.3 through to 55.3.7 provides additional information regarding lighting paintwork and CCTV considerations)

Roller Shutters

Roller shutters and grilles can provide additional protection. I direct the applicant to Chapters 52 and 53 of SBD Commercial Developments 2015 where specifications for roller shutter security can be found. This will also apply where residential underground or undercroft parking is located.

Postal Arrangements.

I recommend the postal arrangements for the apartments is through the wall, external or lobby mounted secure post boxes. I strongly urge the applicant not to consider letter apertures within the apartment 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.

Cycle Storage .

There is no indication of the number of secure bike storage spaces required. The cycle storage area can be accessed via the external doors to the service entrances / delivery area. I recommend that the secure cycle store has PIR lighting installed internally and that the doors have controlled access to prevent unauthorised access to the cycles.

Bicycle racks as a minimum requirement must be secured to the floor. Sheffield hoop style stands, if used, are to be of galvanised steel bar construction of at least 3mm thickness. To minimise unauthorised access and the potential theft of bicycles or bicycle parts I recommend that the bike storage area is divided into two separate sections or secure caged areas, using weldmesh cages, or floor to ceiling robust walling and with controlled access. No more than 30 cycles per section. (SBD Homes 2019 Chapter 57 gives advice re internal bicycle storage).

Bin Store and Plant room

(Chapter 57 of SBD Homes 2019) also provides advice for the refuse store. Further recommendations as for the bike store. (SBD Homes 2019 Para 57.3) refers.

Residential Balconies

I recommend that all balconies are provided with balustrades sufficiently high to deter and prevent persons from falling or climbing over the top of them.

CCTV.

There are various areas of the development that will be out of sight of casual observation by residents and therefore I recommend a CCTV system is considered to cover areas throughout the development especially the underground car park entrance and internal parking areas, main access doors to the ground floor communal foyers and lift lobbies.

Lighting must be commensurate with the CCTV equipment.

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

CCTV guidance for police requirements can be found at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/378449/09-05-UK-Police-Requirements22835.pdf

Lastly,

I recommend that the applicant contact Sussex Police Counter Terrorist Security Advisors for advice in relation to the security of the underground car parking within this development for further advice.

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
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