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Local Policing Supporting Team

Your Ref BR/311/18/PL

Our Ref: NW/ARU/16/03B

Date: 10th January 2019

Dear Mr Davis

RE Land to the East of University of Chichester , Upper Bognor Road , Bognor Regis PO21 1HR

Thank you for your correspondence of 12th December 2018 advising me of the 'Erection of 176 bedroom student accommodation building with associated hard & soft landscaping. This application may affect the setting of listed buildings, may affect the character & appearance of the Upper Bognor Road, Mead Lane Conservation Area & is a Departure from the Development Plan' application 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 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 should be considered.

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.

Accredited products that are fit for purpose and appropriate, along with natural surveillance and access control will assist the development in creating a safe and secure building.

I also refer to our letter PE/ARU/16/03A dated 6th April 2016 regarding planning application BE/54/16/PL which refers to the Technology Park and Student accommodation. Please note that any reference to PAS24:2012 has been superseded by PAS24:2016. This letter refers to general design and access for both buildings, and I will reiterate relevant comments directed towards this application for student accommodation.

Access control will be an essential element in controlling unauthorised access to the residential student accommodation ensuring authorised access is given only to those who reside in the particular block and removing any unwanted, unchallenged and unauthorised person, and so an access control system must apply to the pedestrian entrances.

Mr S Davis
Planning Officer
Planning Control
Arun District Council

Mr J Pritchard
Stride Treglown
Stride Treglown Court
Dowlais Road
Cardiff
CF24 5LQ

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

The student accommodation entrance doors will be required to deal with heavy use over a long period and provide security. Therefore I would recommend that all ground floor communal entrance doors to the student accommodation meet the requirements of LPS1175 Issue 7 SR:2 or STS 202 Issue 2 with controlled access and have remote release of the primary entrance door set.

With regard to the upper floors of student accommodation, 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

To remove opportunist theft, window restrictors or limiters are to be fitted on the ground floor.

Curtain walls and window walls must be installed according to manufacturer's instructions. Additional information can be found within SBD 'Commercial Developments 2015' document Chapter 51 found at www.SecuredbyDesign.com.

I recommend that compartmentalisation is to be utilised to protect the amenity of students. This will control the access from the central core lift and stairwells where each student 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 bedroom is located. I refer to SBD 'Homes 2016' document Annex A and Chapter 27.9.

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 (SBD Homes 2016 Chapter 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. Fire egress stairwells should then be controlled on the ground floor preventing access into the stairwell, to reduce the risk of them being used for anti-social behaviour or criminal activities.

Any fire doors should be devoid of external door furniture and be fitted with an alarm with remote access to enable staff or residents to be alerted that the door has been opened. Warning signage should be displayed to indicate penalties for improper use. Fire escapes / emergency exits should be illuminated during the hours of darkness with dusk to dawn vandal resistant lighting.

Unrestricted egress, from corridors into the stairwells and via the lobby, should also be provided at all times.

For the safety of users, corridor doors should be fitted with vision panels.

Where there are shared kitchen, dining and bathing facilities the below paragraphs are to be implemented where applicable from a Secured by Design perspective.

a. Where a corridor contains no more than 8 bedrooms, the access door to the corridor is to be controlled and is to conform to PAS 024:2016 or its equivalent. Each bedroom door off the controlled corridor (maximum of 8 bedrooms) must be a fire rated (FD30 or higher) door with a minimum lock certificated to BS8621 or PAS 8621, fitted with a minimum of two hinge bolts or hinges with a similar integral facility to ensure protection in the event of a hinge failure following a criminal attack. The bedroom doors must be installed with a securely fixed robust planted stop, door chain and door viewer.

b. Where a corridor contains 9 or more bedrooms to a maximum of 25 bedrooms, there must be a controlled door to the corridor and each of the bedrooms doors must conform to PAS024:2016 or its equivalent.

I would recommend all doors have automatic door closers

Each communal unit's external boundary walls shall have intrusion resistance measures included. However the same level of protection is not required between each of the individual accommodation rooms unless the room abuts a public or semi- public corridor. However it is expected that the wall construction will still be of a robust nature and satisfactorily sound proofed. (SBD Homes 2016 Annex A3.1 and Chapter 24.)

Internal Cupboards and store rooms should also be fitted with fit for purpose doors with controlled access, to prevent unauthorised access to equipment, offices and cleaning materials.

I note that the plant room of Block A has four double outward hinged doors and no internal access to the living accommodation. If the plant room is to be vented via external louvered doors, the area around the lock must be internally protected to prevent access though the louvres and the doors should be a certificated steel door with access control and movement activated switched lighting within the room.

I recommend the external double door sets are certificated and fitted with spring loaded automatic shoot bolts to the unlocked doors to ensure they close first and should be fitted with an automatic door closers. The doors must have controlled access and an internal means of releasing the door to prevent persons from becoming unintentionally locked in.

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.

I direct the agent or applicant to SBD Homes 2016 Chapter 53.3 and 53.4 regarding communal bicycle storage.

I would recommend lockable bicycle shelters with transparent sides using polycarbonate material to a maximum of 20 cycles per store to reduce the payoff if unauthorised access was gained and cycles or cycle parts removed. Stores must be illuminated with dusk to dawn LED vandal resistant lighting and would benefit from surveillance of CCTV.

Should CCTV be a consideration 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.

External lighting must be commensurate with the CCTV equipment.

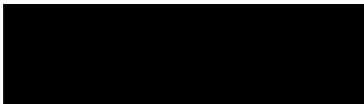
Further details regarding CCTV and Data Protection can be found at the Information Commissioners Office website at https://icosearch.ico.org.uk/s/search.html?query=CCTV&collection=ico-meta&profile=_default

I recommend mail for the two blocks are delivered to a central point for collection by students or by other distribution methods determined by the management. This will prevent unnecessary access to the buildings.

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

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

Telephone: 101 | Ext 540 137