



Local Policing Support Team

Your Ref: BR/38/22/PL

Our Ref: LM/ARU/22/11A

Date 1st March 2022

Contact Name: Lee Melbourne

Dear Mr Davis,

RE: 18-20 London Road Bognor Regis PO21 1PY

Thank you for your correspondence of the 25th of February 2022, advising me of a planning application for part conversion and extension of existing building to provide 6 additional storeys over existing rooftop, to provide for up to 104 No student residential units, with access from Bedford Street, associated servicing and ancillary accommodation, entrance and staircore extension to existing building to provide access from Bedford Street. (Resubmission of scheme approved under reference BR/270/18/PL). This application may affect the setting of listed buildings and may affect the character and appearance of nearby conservation areas. This application is in CIL Zone 4 (Zero Rated) as other development at the above location, 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 – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas.

With the level of crime and anti-social behaviour in the 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 and site specific requirements should always be considered.

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 and Building Control Departments in England (Part Q Security – Dwellings), that recommends a minimum standard of security using proven, tested, and accredited products. Further details can be found at www.securedbydesign.com

Mr Davis
Planning Officer
Planning Control
Arun District Council

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

I note that this is a re-submission of BR/270/18/PL.

I refer the applicant to previous correspondence from this office regarding 18-20 London Road Bognor Regis PO21 1PY - Your Ref: BR/270/18/PL dated the 5th November 2018 and Our Ref: NW/ARU/18/16A dated the 23rd November 2018 to which all comments in the main remain extant.

I note from the planning statement point 6.1 that: *This application comprises the re-submission of a scheme which was supported by officers and approved by the council in 2019. No changes are proposed to the design of that consented proposal. The supporting information to accompany this application submission has been updated to demonstrate the scheme still fully accords with current planning policy and guidance.*

Please find consultee comments as requested.

I direct the applicant or their agent to our website at www.securedbydesign.com where the SBD Homes 2019 Version 2 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.

Whilst I have no concerns regarding the design and layout, I recommend the following security measures to be implemented within the development:

The front access door to the premises will be subject to heavy and prolonged use so needs to be fit for purpose. I refer the applicant to Secured by Design Homes 2019 Version 2 Chapter 21 Paragraph 21.1 to 21.17 and 21.19 to 21.22.

From a crime prevention perspective, it will also be imperative that access control is implemented into the design and layout to ensure control of entry is for authorised persons only. Trades person or timed-release mechanisms are not permitted as they have proven to be the cause of antisocial behaviour and unlawful access to communal developments. For additional information I refer the applicant to chapter 27 of the SBD Homes Document Version 2 2019.

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.

Developments over 25 dwellings can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors of the building. In order to create a safe and secure communal environment for residents occupying blocks of multiple dwellings, and to reduce the opportunity for antisocial behaviour by restricting access to all areas and floors of the building to all residents SBD seeks to curtail unlawful free movement throughout the building through the use of an access control system (compartmentalisation).

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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. 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 refer the applicant to SBD Homes 2019 Version 2 chapter 24 which discusses lightweight framed walls in houses and buildings containing multiple dwellings or bedrooms. Paragraphs 24.1 through to 24.2.3 will be of particular pertinence to this application.

I recommend the postal arrangements for the development is through the wall, external or lobby mounted secure post boxes. I strongly urge the applicant not to consider letter apertures within the front doors of the student accommodation. 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.

With regards to lighting the communal areas to this application I refer the applicant to Chapter 25 SBD Homes 2019 Version 2 Paragraphs 25.3 through to 25.4.

I recommend the application of CCTV to the development and the following documents will be of assistance to the applicant:

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:

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

With regards to the cycle store - research by the 'Design against Crime Centre' suggests that cyclists should be encouraged to lock both wheels and the crossbar to a stand rather than just the crossbar and therefore a design of cycle stand that enables this method of locking to be used is recommended. Minimum requirements for such equipment: • Galvanised steel bar construction (minimum thickness 3mm), filled with concrete; • Minimum foundation depth of 300mm with welded 'anchor bar'. Ideally cycle stores should not hold more than 30 cycles to reduce any pay-off to a would-be offender.

In relation to landscaping - ground planting should not be higher than 1 metre with tree canopies no lower than 2 metres. This arrangement provides a window of observation throughout the area

Finally, lighting throughout the development will be an important consideration and where it is implemented it should conform to the recommendations within BS5489-1:2020.

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Thank you for giving me an opportunity to comment.

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



Miss Lee A Melbourne
Designing Out Crime Officer
Sussex Police Headquarters

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