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Local Policing Supporting Team

Your Ref BR/49/19/OUT

Our Ref: NW/ARU/19/08A

Date: 12th April 2019

Contact Name: Neville Wren

Dear Mr Davis,

RE 26 Burnham Avenue Bognor Regis PO21 2JU

Thank you for your correspondence of 18th March 2019 regarding an 'Outline application with all matters reserved for 22No new dwellings consisting of 2No, 1 bedroom dwellings , 18No, 2 bed dwellings & 2No, 3 bed dwellings, 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 the recently published (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.

Vehicle Parking Provision

I note that there is no off street parking provision for the 22 dwellings. Although there are currently no parking restrictions in the road outside the application, there are many driveway entrances to other properties along its length which limits the space available to park in the road without blocking access to other properties. The location is also fairly close to Bognor Railway Station.

Perimeter

It is important the boundary between public and private space is clearly indicated. Dwelling frontages should be open to view with walls, fencing and hedging to be kept low (maximum height 1 metre) but provide a boundary.

Mr S Davis
Planning Officer
Planning Control
Arun District Council

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

As the first line of defence, perimeter fencing must be adequate with vulnerable areas such as side and rear gardens needing more robust defensive barriers by using walls or fencing to a minimum height of 1.8metres.

Gates that provide access to the side of the dwelling or rear access to the gardens must be robustly constructed of timber, be the same height as the adjoining fence and be lockable from both sides. Such gates must be located on or as near to the front of the building line as possible.

Gate locks that can be key locked from both sides encourage residents to lock the gate after leaving the back garden, which then helps deter potential offenders from reaching the rear house windows by providing an increased layer of security for each property.

Door sets

Secured by Design Homes 2019 paragraph 21.3 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 7:2015 (Note 21:1c) or LPS1175 Issue7.2 SR2:2014 SR2+ (note 21.1d) or LPS 1175 Issue 8 :2018 B3 SR2+ or STS202 Issue 6: BR2 (note 21.1d) or LPS 2018 Issue 1.1:2016 SRB (Note 21.1e).

SBD Homes 2019 document paragraph 27.10 recommends Communal entrance door sets serving 5 dwellings or more but less than 10 falling within this category shall meet the following (in accordance with Section 2A paragraph 21) ; PAS24:2016 STS201, LPS2081 SRB+ .

Door Entry Systems

Chapter 27:20 to 27.23 of SBD Homes 2019 recommends that smaller developments containing up to 25 dwellings or bedrooms shall have a visitor door entry system. The technology by which the visitor door entry system operates is a matter of consumer choice, however it should provide the following attributes:

Access to the building via the use of a security encrypted electronic key (eg, fob, card or key. mobile device etc.

Vandal resistant external door entry panel with linked camera;

Ability to release the primary entrance door set from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation)

Remote release of the primary entrance door set from the dwelling or bedroom.

Live audio and visual communication between the occupant and visitor.

Ability to recover from power failure instantaneously;

Control equipment to be located in a secure area within the premises covered by the CCTV system and contained within a lockable steel cabinet to LPS1175 SR1 or STS202 BR1.

Developers and installers of visitor door entry systems and access control systems should be aware that UL 293 provides reassurance that a system has been assessed against a prescribed security test regime.

Trades persons release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

Installed electronic release hardware must form part of the certified door set range.

SBD recommends the use of colour monitors over black and white as it assists in definition, identification and identification of clothing.

(SBD Homes 2019 specifies developments with more than two floors are required to have a visitor door entry system and access control (regardless of the number of flats /apartments , bedsits or bedrooms) and therefore specifiers are again referred to the content of paragraph 21.1 to 21.7 and 21.9 to 21.22 of SBD Homes 2019 document.)

Windows

Laminated glass meeting the requirements of BS356:2000 class P1A is required for any window located within 400mm of a door set (to ensure the integrity of the locking system. Easily accessible emergency egress windows with non-locking hardware (a requirement of PAS24:2016) and easily accessible roof lights with non- locking hardware.

(Easily accessible is defined within Approved Document Q Appendix A as: a window or door set, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level , or an access balcony . or A window within two metres vertically of a flat roof or sloping roof (with a pitch of less than 30 degrees) that is within 3.5 metres of ground level).

I would recommend all ground floor and easily accessible windows are capable of being locked, (except emergency egress windows) and have restrictors fitted to provide a degree of security when the windows are open for ventilation.

Flat doors

Doors to individual flats should conforming to PAS 24:2016, 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 a door viewer to enable residents to see visitors before opening the door.

Lightweight walls

The security of a development can be severely compromised if lightweight framed walls do not offer sufficient resilience to a criminal attack. This is recognised within Approved Document Q (note 48.1) The SBD requirements are primarily based upon products that have been tested and proven to provide additional security and are outlined in para 24 of SBD Homes 2019.

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.

Lighting is required to illuminate each dwelling elevation containing an external door set, car parking & garage areas including footpaths leading to dwellings (including blocks of flats) where the public, visitors or occupants of the building are expected to use.

I would recommend dusk to dawn energy efficient LED switched lighting. (Research has shown that a constant level, of illumination is more effective at controlling the night environment). (SBD Homes 2019 paragraph's (18) and (25.1 to 25.4) paragraphs (33.1 and 33.2) and paragraphs 59.1 to 59.5 refer to dwelling and street lighting specifications).

Lighting throughout the development will be an important consideration and should conform to the recommendations within BS5489:2013.

Postal arrangements

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

I am pleased to see a cycle storage provision. However there is no gated entrance to the development, which may allow unauthorised access to the proposed open cycle storage at the front. I would recommend that the cycle store is fully enclosed, with no windows and a controlled access door plus internal movement activated vandal resistant lighting and cycle stands or rack. I direct the applicant to Secured by Design Homes 2019 Chapter 56 and 57 for further recommendations. (The door locking system should have an internal lock release to prevent persons becoming accidentally locked into the store).

I will respond further, should it be required at reserved matters.

Thank you for giving me the 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



Neville Wren
Designing Out Crime Officer
Sussex Police Headquarters



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