



Sussex Police
Serving Sussex

www.sussex.police.uk

Local Policing Supporting Team

Your Ref F/16/18/DOC

Our Ref: NW/ARU/16/05C

Date: 19th February 2019

Contact Name: Neville Wren

Dear Mr Easton

RE: Land South of Burnell Road

Thank you for your correspondence of 13th February 2019 requesting advice regarding lighting plans in regard to Condition 17 of planning approval F/7/15/OUT 'Application for approval of reserved matters following outline planning permission A/142/16/OUT 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 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.

In regard to your query I make the following recommendations regarding the proposed lighting plans 111.15_105A External Lighting Scheme Site Wide Elements and 54_15_105 External Lighting Scheme.

Condition 17 of planning application F/7/15/OUT states:-

Prior to the commencement of any development, a lighting scheme showing the details of external lighting (except for the dwellings) shall be to and approved in writing by the Local Planning Authority. The details shall take into account any ecological mitigation measures required. The external lighting shall be installed in accordance with the approved details. Reason: To conserve the wildlife interest of an important natural habitat in accordance with policy GEN29 of the Arun District Local Plan.

Mr S Easton
Planning Officer
Planning Control
Arun District Council

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

From a Crime prevention viewpoint, our previous letters PE/ARU/16/05A dated 12th April 2016 regarding Y/98/18/RES and NW/ARU/16/05B dated 15th January 2019 regarding Y/19/16/OUT stated the Secured by Design viewpoint that 'Lighting throughout the development should conform to the recommendations within the requirements of BS 5489:2013'. (It is recognised some authorities have dark sky policy)

Compliance with BS5489:2013 ensures an overall light level is achieved (SBD Homes 2016 Chapter 18 gives further guidance). It also states in SBD Homes 2016 Chapter 18.3 that 'Bollard lighting is not compliant with BS5489:2013 because it does not project sufficient light at the right height and distorts the available light due to the 'up lighting' effect, making it difficult to recognise facial features and as a result causes an increase in the fear of crime.

A (Declaration of Uniformity to BS 5489:2013) produced by a competent independent lighting designer may provide you with expert lighting advice should you require further clarification. (See SBD Homes 2016 Chapter 18.6 regarding their required qualifications).

SBD Homes 2016 Chapter 18.7 refers to minimising light pollution, and requires that only luminaires' with suitable photometry serving to reduce light spill upwards may be used.

Chapter 56 of SBD Homes 2016 refers to dwelling lighting. Chapters Chapter 30.1 and 65.4 requires lighting to illuminate all elevations containing door set, car parking and garage areas and footpaths between dwellings and blocks of flats. SBD Homes 2016. Research has proven that a constant level of illumination is more effective at controlling the night environment.

The (Manual for Streets 2007) found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf gives further advice regarding street lighting. And states care should be taken to avoid light pollution and intrusion, particularly in rural areas. In some cases it may not be appropriate to provide lighting, for example in a new development in an unlit village.

Chapter 10.3.2 states that 'Lighting may not be appropriate in all locations or contexts. However, if it is to be provided it should be of high quality. Lighting should generally be in accordance with BS EN 13201-2, BS EN 13201-3 and BS EN 13201-4. Guidance on lighting design is given in BS 5489-1, Code of Practice for the Design of Road Lighting, to comply with the requirements of BS EN 13201.

Chapter 10.3.3 Where streets are to be lit, lighting should be planned as an integral part of the design of the street layout, and in conjunction with the location and anticipated growth of planting.

Chapter 10.3.5 states Lighting should illuminate both the carriageway and the footway, including any traffic-calming features, to enable road users to see potential obstacles and each other after dark. The lighting design should ensure that shadows are avoided in streets where pedestrians may be vulnerable. Adequate lighting helps reduce crime and the fear of crime, and can encourage increased pedestrian activity.

There may be exceptions for reasons of protecting wildlife, or a local dark sky policy exists.

I note in application F/7/15/OUT the Ecology Advisor refers to a potential for 'reptile's and 'bats in trees' around the site . She goes on to say a lighting scheme should be taken into consideration to minimise the potential impact to any bats using the trees by avoiding artificial light spill, through the use of light sources and shielding.

I am pleased to see that each dwelling has its own external illumination. However not every household will leave those lights illuminated into the early hours of the morning, to provide sufficient street lighting and then there will be pools of darkness and shadows within the road layout. If movement activated lights are used, it may still leave other areas in darkness, and household lighting will not provide sufficient lighting to illuminate all areas further away from the properties.

From a 'crime prevention' viewpoint I have concerns that for reasons mentioned above the 8 lighting bollards that are indicated on the plans will not be sufficient, (in number or location) and are inadequate to provide sufficient observation for road users during late evenings, early mornings or at night, to help reduce fear of crime, and that shielding around light sources may achieve sufficient reduction of stray light, using conventional light columns conforming to BS5489:2013.

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

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

