

[REDACTED]

From: [REDACTED]

Sent: 06 December 2019 14:00

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: LU/305/19/RES A2/B6 Hampton Park Toddington Lane Littlehampton BN17 7PL

Dear Mr Eastham ,

Please find my recommendations regarding the above planning application attached.

Regards

Neville Wren | Designing Out Crime Officer

Sussex Police Headquarters | Amberley Block

Church Lane | Lewes | East Sussex | BN7 2DZ

[REDACTED]

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Your Ref: LU/305/19/RES

Our Ref: NW/ARU/17/17C

Date 6th November 2019

Contact Name: [REDACTED]

Dear Mr Eastham,

RE: Parcel A2/B6 Hampton Park, Toddington Lane, Littlehampton, BN17 7PL. (Not Sent)

Thank you for your correspondence of 18th November 2019, advising me of an 'Application for Reserved Matters following outline permission LU/47/11 for 46 dwellings - this application may affect the setting of a Listed Building - This is a re-submission of LU/379/18/RES 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. Further details can be found on www.securedbydesign.com within (Homes 2019) document.

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.

The development in the main has outward facing dwellings with back to back gardens which has created good active frontage with the streets and the public areas being overlooked, this design has all but eliminated the need for vulnerable rear garden pathways. Parking in the main has been provided with in-curtillage, garage and a number of on street parking bays, this should leave the street layout free and unobstructed.

Where communal parking occurs it is important that they must be within view of an active room within the property. An active room is where there is direct and visual connection between the room and the street or the car parking area. Such visual connections can be expected from rooms such as kitchens and living rooms, but not from bedrooms and bathrooms. Gable ended windows can assist in providing observation over an otherwise unobserved area.

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.

In circumstances that require a more open feature such as a garden overlooking a rear parking court or a rear garden pathway, 1.5metre high close board fencing topped with 300mm of trellis can achieve both security and surveillance requirements. This solution provides surveillance into an otherwise unobserved area and a security height of 1.8 metres. 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.

For the dwelling blocks A and B it is important that the boundary between public space and private areas is clearly indicated. It is desirable for dwelling frontages to be open to view, so walls fences and hedges will need to be kept low or alternatively feature a combination (max height 1m) of wall, railings or timber picket fence.

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It is important that pedestrians have a good view ahead and around them. Foot paths should be straight, wide and well lit, be overlooked and avoid potential hiding places. Routes for pedestrians, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime and antisocial behaviour.

Careful selection of plant species is critical in order not to impede natural surveillance and avoid unnecessary high maintenance. Trees on appropriate route stocks can provide a more reliable means of reducing the likelihood of reducing natural surveillance. Trees may restrict the performance of street lighting or cause damage by collision with branches and should not be located within 5 metres of a light source. Account must be taken of the effects of seasonal variations.

As a general recommendation where good visibility is needed shrubs should be selected to have a mature growth height no higher than 1 metre, and trees should have no foliage or lower branches below 2 metres which allows 1 metre field of view between them for surveillance.

Secured by Design (Homes 2019 document (Chapter 18) recommends all street lighting should meet specifications within (BS 5489-1:2013). It also comments 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 recognize facial features and as a result causes an increase in fear of crime. Bollard lighting is purely for wayfinding.

Secured by Design (Homes 2019 paragraph 21.3) recommends specifications for all door sets allowing direct entry into the home.

(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) 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)

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. (With the exception of fire escape windows).

(Chapters 22.12 to 22.15 of SBD Homes 2019) refers to specifications for laminated glass meeting the requirements of BS EN356:200 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.

(Note 22.2a). '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 floor or basement level, or an access balcony), or (A window within 2 metres vertically of a flat roof or sloping roof (with pitch of less than 30degrees) that is within 3.5 metres of ground level.

For the apartment blocks A and B that contain multiple dwellings I refer the applicant to (Chapter 27 of SBD Homes 2019) in relation to (Access control).

In regard to (Block A) which has 4 apartments opening onto a single central stairwell with ground floor communal access doors. (SBD Homes 2019 paragraph 27.7) recommends that communal entrance door sets in blocks serving 4 dwellings or less, over no more than two floors, are not required to be connected to a visitor door entry system and access control system, and can be controlled by non – electronic keys only i.e. requiring residents to meet and greet visitors at the communal door. Door sets shall comply with the physical security requirements of (paragraphs 21.1 to 21.7 and 21.19 to 21.22).

In regard to (Block B) which has 10 dwellings with 6 accessed by a stairwell over three floors and another 4 dwellings over 2 floors accessed by a separate stairwell; (SBD Homes 2019 refers to communal access

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control (Para's 27.10) and (Para's 27.14) and (Para's 27.16). for blocks containing 5 but less than 10 dwellings, and electronic entry systems for 10 dwellings or more. Specifiers are reminded that the installed electronic release hardware must form part of the certified door set range.

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 or LPS1175 Issue 7 SR2.(SBD Homes 2019 document chapter 27.14 refers)

Doors to individual apartments should conform 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 door viewer to enable residents to see visitors before opening the door.

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

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.

I am pleased to see that the cycle and bin stores for block A and B are windowless and the bin store is separated from the cycle store. The separation must be a floor to ceiling, 'fit for purpose' and secure dividing wall to prevent access to the cycles from within the store.

(SBD Homes 2019 Chapter 56) refers to secure cycle storage facilities.

External double leaf doors within the bin stores are notoriously difficult to secure. The reason being that, the first opening leaf will have nothing secure to lock too if the opposite leaf has not been secured correctly, as there is effectively no frame between the door and first opening leaf. (However, if the first closing leaf is fitted with sprung loaded shoot bolts and automatic door closer the first opening leaf will be able to lock to the opposite leaf. With the door and leaves closed together (without the leaf first being secured with drop bolts) there is no indication that the leaves are insecure until entry is gained by pulling on the handles.

(Para 56.3) provides further information regarding external communal bicycle storage and (Para 56.4) provides minimum specifications for such equipment.

The applicant may wish to view www.securedbydesign.com where under (Member Companies) and (Accredited product search) they will find a list of approved tested cycle security products including cycle racks and stands.

External communal bicycle stores with individual stands or multiple storage racks for securing bicycles must be as close to the building as possible, but in any event 50 metres of the primary entrance to a block of flats and located within view of an active room. The store must be lit at night using vandal resistant light fittings and energy efficient lamps. (An active room is where there is direct and visual connection between the room and the cycle storage facility, street or the car parking area. Such visual connections can be expected from rooms such as kitchens and living rooms, but not from bedrooms and bathrooms). Gable ended windows can assist in providing observation over an otherwise unobserved area.

I have a concern that the external visitor cycle storage at the eastern end of the car park of Block A and south of block B are not sufficiently close to the buildings to be easily observed and are vulnerable.

Areas of play should be situated in an environment that is stimulating and safe for all children, be overlooked with good natural surveillance to ensure the safety of users and the protection of equipment, which can be vulnerable to misuse. I am pleased to see that the identified location is surrounded with railings with self-closing gates to provide a dog free environment. Additionally it will be necessary to keep foliage low in order



to maintain natural surveillance throughout, ground planting no higher than 1 metre with tree canopies no lower than 2 metres. This must include inclusion of boundary fencing and landscaping of the area, but still provide natural surveillance and lighting as appropriate. The play areas should also reflect the differing age ranges; ensuring consideration has been given to all.

I have a concern that the gate of the LEAP facing Toddington Lane may present a danger to unaccompanied children leaving the area into a potentially busy road. I would recommend a pedestrian barrier opposite the gate, on the pavement, to prevent them running directly out into the road or alternatively relocated the gate.

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



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