



Local Policing Support Team

Your Ref: LU/60/22/PL

Our Ref: LM/ARU/22/16A

Date 9th March 2022

Contact Name: Lee Melbourne

Dear Mrs Gardner,

RE: 27 Clifton Road Littlehampton BN17 5TE

Thank you for your correspondence of the 8th of March 2022, advising me of a planning application for change of use (regularisation and part retrospective) from 11 bed HMO (Sui Generis) to a 20 bed HMO & 2 No dwellings (net gain of 1 No dwelling). This site is in CIL Zone 4 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.

This planning application is seeking a change of use (regularisation and part retrospective) from 11 bed HMO (Sui Generis) to a 20 bed HMO.

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

Mrs Gardner
Planning Officer
Planning Control
Arun District Council

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

has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure, and sustainable environments.

Historically there are cases where houses of multiple occupancy (HMO) have given rise to instances of anti-social behaviour (ASB). To reduce the risk of this occurring there will need to be stringent management control of tenancies. This could be implemented as a condition of planning.

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 HMO 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 very important that access control is implemented into the design and layout to ensure control of entry is for authorised persons only. Tradesperson or timed-release mechanisms are not permitted as they have been proven to be the cause of antisocial behaviour and unlawful access to communal developments. For further information I refer the applicant to Chapter 27 of SBD Homes 2019 Version 2.

With regards to windows and glazing I refer the applicant to Chapter 22 Paragraph 22.1 to 22.16 of SBD Homes 2019 Version 2. Any windows that are being retained are to have adequate fit for purpose locks or security measures fitted.

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.

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 HMO 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 individual rooms. 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.

Should CCTV be a consideration 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

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



With regards to the communal terrace which can be used by all residents - in order to safeguard the amenity of the surrounding residential properties use of this area late into the night must be stringently managed to ensure excessive noise is kept to a minimum.

Over the last year there have been a number of incidents reported to the police from this address. Having spoken to the local neighbourhood policing team about this and to reduce the potential for further incidents I would ask that both new and existing tenants are regularly reminded of their responsibilities regarding their tenancies as outlined in the accompanying management statement.

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

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

