



Local Policing Support Team

Your Ref: M/68/20/PL

Our Ref: LM/ARU/20/29A

Date 16th September 2020

Contact Name: Lee Melbourne

Dear Mrs Gardner,

RE: Poultry Farm 87 Yapton Road Middleton-On-Sea PO22 6DY

Thank you for your correspondence of the 16th September 2020, advising me of a planning application for Demolition of the existing structures & redevelopment to provide a new 66-bedroom care home arranged over two storeys together with associated access, car & cycle parking, structural landscaping & amenity space provision (resubmission following M/80/19/PL). 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.

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

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 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 note this is a resubmission following refusal earlier this year.

Mrs Gardner
Planning Officer
Planning Control
Arun District Council

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

I refer the applicant to previous correspondence from this office Your Ref: M/80/19/PL dated the 19th September 2019 and Our Ref: NW/ARU/19/23A dated the 24th October 2019 to which all comments remain extant.

Accordingly I also reiterate some of the comments which were made regards to the previous application from this office as they are pertinent to this resubmission.

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.

Additionally I direct the applicant or their agent to our website at www.securedbydesign.com where the Secured by Design (SBD) Commercial Development 2015 Version 2 document can be found. This is a comprehensive document that encapsulates both commercial developments where the public have no formal access, e.g. factory or office buildings, and those where public access is integral to the commercial use such as retail premises, leisure centres and public buildings. This document will be able to provide the applicant with in-depth crime prevention advice pertinent to the design and layout.

I would also strongly urge the applicant to refer to the document Secured by Design Hospitals 2005 as there are recommendations contained within this design guide which can be applied to this application especially with regards to the drugs room. I therefore direct the applicant or their agent to our website at www.securedbydesign.com where this document can be found.

From a crime prevention perspective, it will be imperative that access control is implemented into the design and layout to ensure control of entry to the building is for authorised persons only. The residential building within the development will house potentially vulnerable residents and so preventing unauthorised access to their private living accommodation and bedrooms is important.

SBD recommends that all communal dwellings with more than 10 dwellings or bedrooms have a visitor door entry system or an access control system to enable management oversight of the security of the building. It should also incorporate a remote release of the primary entrance door set and have audio visual communication which will be necessary with regards to this application in order for visitors to engage effectively with reception especially if attending out of hours.

SBD Homes 2019 Chapter 27.29 to 27.33.3 recommends compartmentalisation of residential developments incorporating 25 or more flats, apartments, bedsits or bedrooms. This includes, lobbies, lifts and stairwells and residential landings. SBD therefore seeks to prevent unlawful free movement throughout the building through the use of access control.

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The application of such 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. Fire egress stairwells should then be controlled on the ground floor preventing access into the stairwell, to reduce the risk of them being used for anti-social behaviour or criminal activities. Unrestricted egress, from the corridor into the stairwell via the lobby, should also be provided at all times.

Implementing compartmentalisation within this application should be resident led taking into account the day to day practicalities of being able to effectively achieve this measure.

The design and access statement mentions that the hub may be used by the local community. From a crime prevention perspective should this happen there must be clear delineation between the public and private areas of the building so that vulnerable residents in situ are protected and their privacy is maintained.

I also recommend that consideration is given to the installation of a CCTV system in order to monitor the external areas of the development including the car park and internal reception area where the general public may have access.

Further 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>

Any parking provision must be illuminated during the hours of darkness. The parking area should also be overlooked and clearly visible from the building where there is a direct and visual connection. Such visual connections can be expected from rooms such as the main reception area and manager's office or communal rooms that are regularly or continually occupied. Staff parking and public parking should be separate and marked accordingly.

The perimeter fencing to the back of the secure garden must be adequate by using fencing to a minimum height of 1.8metres. Gates that provide access to the side of the building or rear access to the gardens must be robustly constructed of timber, be the same height as the adjoining fence and be key lockable from both sides. Such gates must be located on or as near to the front of the building line as possible. There may be circumstances where more open fencing is required to allow for greater surveillance. Trellis topped fencing can be useful in such circumstances.

With regards to the public right of way SBD recommends that public footpaths should not run to the rear of, and provide access to gardens, rear yards or dwellings as these have been proven to generate crime. Where a segregated footpath is unavoidable, for example a public right of way, an ancient field path or heritage route, designers should consider making the footpath a focus of the development and ensure that they are as straight as possible • wide • well lit (within BS 5489-1:2013) • devoid of potential hiding places • overlooked by surrounding buildings and activities • well maintained so as to enable natural surveillance along the path and its borders.

With regards to the balconies in order to safeguard residents I recommend that all balconies are provided with balustrades sufficiently high to deter and prevent persons from falling or climbing over the top of them.

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With regards to proposed landscaping I recommend that 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 BS 5489-1:2013. SBD considers that bollard lighting is not appropriate as it does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.

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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