

[REDACTED]

From: Nicola Moore on behalf of Planning.Responses
Sent: 25 October 2019 09:18
To: Planning Scanning
Subject: FW: M/80/19/PL Former Poultry Farm Land off Yapton Road Middleton-on-Sea PO22 6DY
Attachments: ARU 19 23A - Former Poultry Farm Land off Yapton Road Middleton on Sea PO22 6DY.pdf

[REDACTED]

Nicky Moore | Technical Support Assistant, Planning Department, [Arun District Council](#) | Location: First floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

[REDACTED]

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From: Neville.Wren [REDACTED]
Sent: 24 October 2019 12:44
To: Planning.Responses [REDACTED]
Subject: M/80/19/PL Former Poultry Farm Land off Yapton Road Middleton-on-Sea PO22 6DY

Dear Mrs Gardner,

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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Local Policing Support Team

Your Ref: M/80/19/PL

Our Ref: NW/ARU/19/23A

Date 24th October 2019

Contact Name: Neville Wren

Dear Mrs Gardner

RE: Former Poultry Farm Land off Yapton Road Middleton on Sea

Thank you for your correspondence of 19th September 2019, advising me of the 'Demolition of the existing structures & redevelopment to provide a new 66-bedroom care home (Use Class C2) arranged over two storeys together with associated access, car and cycle parking, structural landscaping and amenity space provision 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 (Commercial Developments 2015) and (Homes 2019) documents.

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 residential building within the development will house potentially vulnerable residents and so preventing unauthorised access to their private living accommodation and bedrooms is important with good access control to the perimeter as well as the care home building itself, with clearly defined separation between public and private areas. I am pleased to see that some security measures have been considered.

Mr A Gardner
Planning Officer
Planning Control
Arun District Council

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

In regard to access for the development I refer the applicant to (SBD Homes 2019) document which in the main will be applicable to this application and refers to layout and design of a development to create safe and secure environment, including road layout, footpath design, communal areas, dwelling boundaries, car parking and external lighting.

(Para's 8.1 to 8.2) & (8.8 to 8.21) of SBD Homes 2019) refers to lighting and the layout of roads and footpaths, including planting.

Perimeter Fencing

The perimeter fencing of the back 'secure' garden must be adequate with vulnerable areas such as side and rear 'secure' 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 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. (Paragraph 10.5 to 10.9.4) provides additional recommendations regarding fencing, driveway and pedestrian gates.

Defensive planting may also assist as a deterrent to unauthorised access.

Main Gate

Driveway gates with access control with remote release operated from the manager's office or use of a swipe card, fob, digital coded lock or electronic release with intercom and CCTV may help provide additional security, not only during the day but especially at night time when less staff will be on duty and visitors are allowed to arrive at any time. (Para 10.6.8 of SBD homes 2019) refers.

There must be clearly identified separation between pedestrian footpaths and the driveway for vehicles.

It is important that the boundary between public and private areas is clearly indicated.

Parking

Parking provision must be illuminated during the hours of darkness especially for the health and safety of shift workers who may arrive and leave during darkness. The parking area should be overlooked and clearly visible from the building where there is direct and visual connection between the room and the car parking area. 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.

Motor bike parking bays would benefit from bespoke secure steel posts firmly concreted in to the ground where motor cycles can be securely attached with security chains and devices supplied by the riders.

Door Specifications

Secured by Design (Homes 2019) 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 4:2012 (Note 21:1c) or LPS1175 Issue7.2 SR2 (note 21.1d) or STS202 Issue 3 BR2 (note 21.1d))

The communal entrance doors with 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) and be fitted with swipe card access.

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Windows and Glazing

(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.

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 for ventilation, but deter easy access through them from the outside.(Excluding emergency egress windows).

(SBD Homes 2019 Paragraphs 21.5 to 21.8) refers to glazing in adjacent door sets, including fire rated door sets.

(Chapter 22 of SBD Homes 2019) provides recommendations in regard to windows.

(Para 22.1) states window frames must be securely fixed to the fabric of the building in accordance with manufacturer's instructions. (Para 22.2) states all easily accessible windows (including easily accessible roof lights and roof windows shall be certified to one of the following standards

(PAS 24:2016 (note 22.2.B) or (STS204 Issue 6:2016 (Note 22.2c) or (LPS1175 Issue 7.2:2014 SR1) (Note 22.2d) or (LPS1175 Issue 8:2018 SR1/A1) or (STS202 Issue 7:2016 BR1) or (LPS2081 Issue 1.1:2016 SR A).

Note 22.2a. 'Easily Accessible' is defined within Approved Document Q Appendix A.

Access Control

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. SBD recommends that all communal dwellings with more than 10 dwellings or bedrooms should have visitor door entry system or access control system to enable management oversight of the security of the building i.e. to control access to the building via the management of a recognised electronic key system. It should also incorporate a remote release of the primary entrance door set and have audio visual communication between the manager's office or reception and the visitor. Door sets that are fitted with electronic locks or electronic staples must form part of the manufacturers certified range of door sets.

Internal Access

The internal doors from the public areas of the reception area including lifts and stairwells to rooms and corridors on the ground, first and second floors must be access controlled to prevent unauthorised access to the private areas of the building and subsequent intrusion into any of the bedrooms via the corridors.

The security recommendations below regarding compartmentalisation for these internal corridors depends greatly on how the Care Home operates and the physical and mental abilities, health and welfare of the residents and practicality in managing the premises.

Compartmentalisation will be a matter for the specifier and developer.

Compartmentalisation

(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 seek to prevent unlawful free movement throughout the building through the use of access control.

The application of such may be achieved by either, or a combination, of the following:

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- 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 (SBD Homes 2019 Chapter 27.29). 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.

SBD recommends no more than 25 flats or should be accessed via either of the access control methods above. This means that no more than 25 flats should be accessible from the compartmentalised point. (eg:- If you have a controlled door from the stairwell only 25 flats are to be accessible from it).

Basically it is saying SBD wants to remove free access throughout the block for all residents (or visitors or tailgaters) in order to reduce any crime and incidents of anti-social-behaviour and the statement above suggests the best way to do it.

Due to the different nature of the building and its vulnerable residents, their care must be a priority when considering the above recommendations.

Door Entry Systems

(SBD 'Homes 2019' Paragraphs 27.24 to 27.28) refer to visitor door entry systems for developments with more than 25 flats, apartments or bedrooms.

Visitors and residents are most likely to use the front main entrance and reception. (Commercial Developments 2015 Paragraph 37.1) gives advice regarding reception areas. Access beyond reception should be controlled using automatic locking doors, or controlled by the receptionist or by proximity reader technology with fobs or ID cards issued to staff.

Mail Delivery

SBD (Commercial Developments 2015 Chapter 63) refers to Mail delivery for commercial premises and SBD (Homes 2019 paragraphs 21.28 to 21.35) refers to letter plates, surface mounted letter boxes and 'Through the Wall' delivery. However, where there is a day time reception in operation, mail is usually delivered to the reception area or office.

Fire Alarm

The application must be fitted with a fire alarm system.

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

Paragraph 27.34 to 27.35 refers to emergency door release devices.

Intruder Alarm, Help Alarm and Attack Alarm

I would also recommend an intruder alarm system which should include coverage of the reception and office areas. This may be controlled by the Duty Manager or an alarm receiving centre. A personal attack alarm system linked to the manager's office may be an option to assist staff if assaulted or attacked in a remote part of the building.

A help alarm system for each resident's bedroom should also be linked to the manager's office.

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Internal Lighting

The internal lobbies, lift wells, foyers, stair wells, stair cases and corridors should be fitted with 24 hour movement activated 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.

External Lighting

External lighting is required to illuminate each dwelling elevation containing an external door set, and car parking 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 vandal resistant 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 as far as possible conform to the recommendations within (BS5489:2013).

Lightweight Framed 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).

CCTV

I also recommend consideration to installing a CCTV system (subject to Data Protection and Rights of Privacy etc.) to monitor the front entrance, car park and main 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>

Should CCTV be a consideration I recommend that a set of Operational Requirements is created? This will enable the CCTV system to be used to its best ability ensuring that it is fit for purpose. Details on how to set up a set of O.R.'s can be found on the Home Office website; see CCTV Operational Requirements Manual 2009.

The development of an Operational Requirement Statement is essential; this document is unique to each system and will be used for the design and performance specification of the system. It is a statement of problems, not solutions, highlighting areas covered by the system and the times and description of activities giving cause for concern.

Bike and Bin storage

I am pleased to see secure bicycle storage will be provided in an area well overlooked from the surrounding building. External cycle storage should be located as close to the occupied buildings as possible and within 50 metres of a primary entrance door. They should also be fitted with Sheffield hoop style stands of galvanised steel bar construction of at least 3mm thickness or other suitable anchorage points fit for purpose and be in view of an active room or CCTV.

(Chapter 56 and 57 of SBD Homes 2019) provides recommendations for external and internal storage facilities and also mobility vehicles and bin storage areas.

Plant room

I note that the plant room has a one and a half leaf door set. External 1 1/2 leaf doors are notoriously difficult to secure. The reason being that, should the leaf be unlocked and not secured correctly, the door will not

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have anything to be secured to as there is effectively no frame between the door and leaf. (In its correct closed position the leaf is secured with shoot bolts) With the door and leaf closed together (without the leaf being secured) there is no indication that the leaf is insecure until entry is gained by pulling on the handle. Automatic door closer should be attached to the first leaf and doors must have access control. An internal release such as a thumb turn lock must be provided to prevent accidental locking in. I recommend the plant room, store and goods receiving rooms should have movement activated LED lighting. The rooms must be lit.

Secure Staff Lockers

I recommend that a changing room and secure lockers should be provided for the staff to keep items of personal clothing, valuables, whilst they are at work.

Cash Safe and Secure Storage

Consideration must be given to the safe storage of money, drugs, sensitive records and valuable items. Also computer servers and electronic records. A separate remote back up system for electronic records should be used in case of emergency. Drugs should be stored within a secure room or certified drugs cabinet.

Any cash safe, drugs room or secure room or cupboard should be under the view of an intruder alarm sensor.

(Chapters 64 to 68 of SBD Commercial Developments 2015) provides recommendations in regard to secure computer and server rooms; public address systems for communication in an emergency; Secure internal door sets and safes and strong rooms.

I would 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.

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



Neville Wren
Designing Out Crime Officer
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