



Local Policing Support Team

Your Ref: WA/48/19/RES

Our Ref: NW/ARU/15/08B

Date 11th July 2019

Contact Name: Neville Wren

Dear Mr Cole

RE: Land to the East of Fontwell Avenue, Fontwell Avenue, Fontwell.

Thank you for your correspondence of 13th June 2019, advising me of an 'Approval for Reserved Matters following outline permission WA/22/15/OUT comprising 400 new homes (incl. affordable), 360sqm of retail space (A1 to A3), 152sqm of community space (D1 to D2 & including retention & refurbishment of 12sqm 'old smithy'), demolition of remaining buildings to Arundel Road along with public open space, LEAP, MUGA, allotments, car & cycle parking, drainage & associated works - This site also lies within the parish of Barnham & Eastergate' 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) and (Commercial Developments 2015) 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 needs should be considered.

Mr R Cole
Planning Officer
Planning Control
Arun District Council

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I refer to our previous letter PE/ARU/15/08A dated 18th June 2015 regarding planning application WA/22/15/OUT to which all matters remain extant excluding the employment area which I note has 2.5m high perimeter fencing bordering the dwelling areas.

I am pleased to see some crime prevention measures have been considered within the application and that additional gable ended windows have been included in several plots at the south end of the development.

Community Building, The Bottle Store

Doors

Firstly, I refer to 'The Bottle Store' community building. As the building is for community use the door sets will need to be secure and able to withstand heavy use over a long period. There is also an expectation that the security will be required to meet the following minimum standards when the building is unoccupied. Secured by Design therefore recommend that all external door sets meet LPS1175 Issue 7 SR2 or STS201 or STS202: Issue 3 BR2. (SBD Commercial Document 2015 Para 56.1 and 56.2 refer).

Door recesses should be avoided where possible as they provide opportunities for crime and anti-social behaviour.

(Para 58.2) refers to requirements for any glazed panels installed as an integral part of the door set.

Windows & Glazing

It is also important windows are similarly protected with the window apertures protected to standards listed within (SBD Commercial Developments 2015 Para 62.1)

Para 51 provides recommendations regarding 'Glazed Curtain Walling' and 'Window Wall' systems and fitting requirements.

Flat roof and Climbing

I note the building has a flat roof and also roof lights which can be a temptation to gain unauthorised access for criminal activities or antisocial behaviour. (Para's 35 to 35.3 of SBD Commercial Developments 2015) provides advice on roof design and measures to reduce attempts to climb. (Para 55.1 to 55.3) gives advice regarding roof light standards and requirements.

Intruder Alarm

The fitting of a monitored intruder alarm can act as a deterrent to crime (see Para 64 of the above document)

Lighting

Both external and internal lighting can play a large part in Health and Safety measures for users of the building and also help deter crime and aid surveillance. I refer the applicant to Chapter 39 of SBD Commercial Developments 2015 which provides recommendations for both areas. Internally, a lighting system which will automatically switch lights on and off due to movement or the lack of it in each room assists surveillance and draws attention from casual users outside when the property is unoccupied.

External lighting must meet the requirements within BS5489 and it must also be commensurate with any CCTV system, should one be considered. The car park should be illuminated with vandal resistant switched dusk to dawn lighting when the building is in use.

Storage

Interior rooms and storage cupboards must have 'fit for purpose' secure doors with access control, especially those that contain cleaning chemicals and hazardous materials or items of value.

Anti-graffiti Coatings

For the exterior of the building I would also recommend anti-graffiti coatings or paint where considered appropriate.

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I have a slight concern regarding whether there is sufficient parking for the Bottle Store Community building at the very end of the access road at the north end of the development. During a community event there is an expectation vehicles will be driven to the location and fill the car park. This may cause an overflow into the road outside and block the neighbouring properties driveways or make turning a vehicle around to exit difficult. I recommend that parking restrictions are considered to provide a clear exit for vehicles leaving the building and also for neighbouring properties opposite.

I also recommend that some secure cycle storage facilities are provided. Minimum specification are Sheffield hoop style storage racks (See cycle storage details further on).

Convenience Retail Unit within Block A

I refer to my comments as above in relation to the 'Bottle Shop' Community Building and recommend the same security requirements for the ground floor retail unit within block A. In addition, intrusion resistance is to be included within the building skin and party walls of each unit to remove any unauthorised access.

I note the retail unit has two external doors, (one on either side of the building) plus an internal door which leads to the ground floor communal hallway of Block A. The door to the hallway must have controlled access or consideration given to removing it. SBD recommends public and private areas should be separate. Security for the retail shop and the communal residents would be otherwise compromised. From a crime prevention viewpoint the use of just one external door as access and egress for shop users is easier to supervise than an exit on both sides of the building and would assist in deterring shop lifters and other crime.

Fire Doors

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

The inclusion of an intruder alarm and insurance rated safe fitted to manufacturer's instructions would also provide additional security for money and valuable items, documents and keys etc.

Dwellings

Block A has 18 dwellings within it, over three floors and so will require a door entry system to access, via the ground floor hallway which will require controlled access. The access for residents should not be compromised by a single access door from the communal hallway into the Commercial /retail property, which may be used by staff or members of the public requiring access through the communal hallway and potentially compromise security.

Door Entry Systems

(Paragraph 27.16 of SBD Homes 2019) states that all communal dwellings with 10 flats , apartments , bedsits or individual bedrooms , (see para 27) or more shall have a visitor door entry system and access control to enable management oversight of the security of the building ie, to control access to the building via the management of an recognised electronic key system.

Chapter 27:20 to 27.23 of SBD Homes 2019 provides recommendations for smaller developments containing up to 25 dwellings or bedrooms that shall have a visitor door entry system.

(In addition to the above I recommend door entry control equipment to be located in a secure area within the premises covered by a CCTV system and contained within a lockable steel cabinet to LPS1175 SR1 or STS202 BR1).

SBD also recommends for a shared door set with access controlled by use of a key without a designated access control system (and no remote release facility), serving a maximum number of 10 dwellings (flats,

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bedsits or bedrooms). Door sets falling within this category shall meet the same physical requirements as external door sets served off a shared corridor or stairway dwelling door set.
(See SBD (Homes 2019) paragraph 21 External Dwelling Door sets.)

Door set Specifications

Secured by Design Homes 2019 paragraph 21.3 provides recommendations and specifications for recommends 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 to ensure integrity of the locking system) 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)

Door sets that are fitted with electronic locks or electronic staples must form part of the manufacturers certified range of door sets. I would like to direct your attention to chapter 27.15 of SBD Homes 2019 where it states the certification requirements of the communal door set and why a more robust standard is now required. Communal entrance door-sets with a separate adjacent access control panel are usually subjected 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)

Flat and Apartment Doors

The access doors to individual internal flats should conforming 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 closer, safety chain or stop and a door viewer to enable residents to see visitors before opening the door.

Windows.

All ground floor and easily accessible windows shall also be certified in accordance with Chapter 22 of SBD Homes 2019 document). Easily accessible is defined within Building Regulations Document Q Appendix A as: (A window or door set, any part of which is within 2 metres of an accessible level surface such as a ground floor or basement level or an access balcony.)

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 (for air flow in hot weather) from the internal side, but deter easy access through them from the outside.

Fire Doors

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.

Internal lighting

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

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External Lighting

Lighting is required to illuminate each dwelling elevation containing an external door set, car parking & garage 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 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).

Street lighting throughout the development will be an important consideration.

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.

Light weight Wall Construction

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).

Postal arrangements

I recommend the postal arrangements for the flats is through the wall, external or lobby mounted secure post boxes. I strongly urge the applicant not to consider letter apertures within the flats' 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. (SBD Homes 2019 Paragraph 38.1 to 38.5 refer).

Cycle Stores and Bin Stores

I understand cycle parking will be contained mainly within private garages or secure garden sheds.

I would also recommend some external secure cycle storage in the vicinity of the retail premises in block A, and also close to the Community Building and the Play Areas. (A minimum standard of Sheffield hoop style stands of galvanised steel bar construction of at least 3mm thickness and filled with concrete. (See para 56.4)

I refer to Chapter 56 to 57.3 of SBD Homes 2019 in relation to further recommendations regarding internal and external bicycle secure storage.

All cycle store buildings must be windowless and illuminated with movement activated lighting. The doors must meet the same specifications as the communal doors of the dwellings and with controlled access with a thumb turn release (or similar) to prevent accidental locking in and where required, and vision panel or door viewer to allow persons entering the store to check who may be inside before entering.

I have a concern regarding the external bike stores with double doors, as double leaf doors are notoriously difficult to secure. The reason being that, should the first closed leaf be unlocked and not secured correctly, the second leaf will not have anything to be secured to as there is effectively no frame between each leaf. (In its correct closed position the leaf that closes first must be secured with spring loaded shoot bolts top and bottom). With both leaves closed together (without the first leaf being secure) there is no indication that the leaf is insecure until entry is gained by pulling on the handle. I recommend that the first closing leaf has spring loaded shoot bolts and an automatic door closer, or alternatively the fitting of a wide single door set.

Combined Cycle Stores and Bin Stores must be separated from each other by a secure floor to ceiling wall or security barrier such as weldmesh and with a separate secure access controlled door. Para 57.1 of SBD Homes 2019 gives further recommendations regarding bin stores.

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Garage Doors

I refer to garage door sets which are part of a dwelling or completely detached from a dwelling. In order to provide security for high value items and vehicles, I recommend that they comply with (Para 54 of SBD Homes 2019. Garages with internal doors to the dwellings will also benefit from an additional layer of security.

Play Areas.

I am pleased to see the play areas within the application are located where they are open to view, with casual surveillance from nearby properties. Boundaries between public and private space should be clearly defined. Play areas should ideally be designed so that they can be secured at night to reduce incidents of antisocial behaviour damage and graffiti. Consideration should be given to a single dedicated entry and exit point. Fencing at a minimum height of 1.2m can often discourage casual entry and provide a safe and clean play area, assist with child safeguarding and preventing dogs entering. (Chapter 9 of SBD Homes 2019 provides recommendations regarding communal areas and play space)

Careful selection of plant species is critical throughout the development and around the vicinity of the play areas 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 damage lighting installations with branches colliding with them 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.

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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Designing Out Crime Officer
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