



Local Policing Support Team

Your Ref: WD/2022/3222/MAO Our Ref: PE/WEA/23/07/A Date 15th February 2023
Contact Name: Phill Edwards Tel: Mobile No: 07780987871

Dear Mrs Turner

RE: Land to the south of the A271 and east of the A22, Lower Horsebridge, Hailsham.

Thank you for your correspondence of 08th February 2023, advising me of an outline planning application for a development of up to 124 no residential dwellings, associated infrastructure (including a new access junction onto the A271) and open space 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 using Crime Prevention Through Environmental Design (CPTED) principles and 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 by the applicant at www.securedbydesign.com. Due to the application being outline, my comments will be broad with more in-depth advice being delivered at reserved matters.

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.

The level of crime and anti-social behaviour in the Wealden district is below average when compared with the rest of Sussex. I have no major concerns with the proposals, however, additional security measures to

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mitigate against any identified local crime trends and site-specific requirements should always be considered. I would like to raise the following observations.

The site is next to the Boship Roundabout with access being proposed off the A22 adjacent to Brook House. The design and layout show a street network involving a single main access route, with a series of short cul-de-sac side roads (with appropriate turning space for emergency services and waste collection vehicles). This essentially creates six smaller residential parcels within the site. Additionally, a network of paths (footpaths and potentially a cycle path) is being proposed the open space area, along with a play area.

Dwellings in the main face out onto the street layout creating good active frontage and good levels of natural surveillance. Back-to-back gardens have removed the need for vulnerable rear garden pathways. Parking has been provided within garage, on-curtilage, overlooked and parking courts. I see no evidence of visitor or on-street parking. 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.

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, timber picket fencing or defensive planting. Whereas, vulnerable areas, such as exposed side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m.

Where gates are being provided to access the rear gardens, they must be placed at the entrance to the garden as near to the front building line as possible to remove any recess for loitering. This will ensure that attempts to climb them will be in full view of the street. They are to be the same height as the adjoining fence so as not to reduce the overall security of the dwelling's boundary. Where possible the street lighting scheme should be designed to ensure that the gates are well illuminated. Gates must be capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb or remove from their hinges.

Communal areas, such as playgrounds, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour. Care should be taken by the developer to ensure that a lone dwelling will not be adversely affected by the location of the amenity / play space, and it should be noted that positioning an amenity/ play space to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance.

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. They should be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space should be clearly defined with open spaces having features which prevent unauthorised vehicular access Para 9 SBD Homes 2019.

In order to ensure that there is as much natural surveillance across the development as possible, ground planting should be no higher than one metre with tree canopies no lower than 2 metres. This arrangement provides a window of observation throughout the area. This will allow for the interaction of capable guardians across the site to observe and report any incidents and occurrences. A capable guardian has a 'human element', that is usually a person who, by their mere presence, would deter potential offenders from perpetrating a crime. However, a capable guardian could also be CCTV, providing that someone is monitoring it at the other end of the camera at all times.

Due to the proposal for the introduction of a network of paths (footpaths and potentially a cycle path) being provided through the open space area. I would like to point out that when introducing public footpaths into

developments, caution should be used as the introduction of a footpath into or through a development has the potential to generate crime if not adequately designed.

Chapter 8.3 of SBD Homes 2019 V2 states; *Whilst it is accepted that through routes will be included within the development layouts, the designer must ensure that the security of the development is not compromised by excessive permeability, for instance by allowing the criminal legitimate access to the rear or side boundaries of dwellings or by providing too many or unnecessary segregated footpaths.*

Chapter 8.10 Footpath Design. *SBD have identified that public footpaths should not run to the rear of rear gardens as this have 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 5489-1:2020) • 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.*

SBD Homes 2019 V2 chapter 8.12 *Where isolated footpaths are unavoidable, and where space permits, they should be at least three metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles, and mobility vehicles). Where footpaths are designated as an emergency access route, they must be wide enough to allow the passage of emergency and service vehicles and have lockable barriers.*

With regard to the blocks of multiple dwellings. From a crime prevention perspective, it will be imperative that access control is implemented into the design and layout to ensure control of entry is for authorised persons only. SBD recommends specific requirements for access control and door entry systems depending on the quantity of dwellings within each block. Please see SBD Homes 2019 V2 chapter 27, respectively. Tradesperson buttons are not recommended as they have been proven to be the cause of anti- social behaviour and unlawful access to communal development. For multiple blocks of multiple dwellings serving ten dwellings or more please see chapter 27.14. More robust construction.

With respects to mail delivery for blocks of multiple dwellings. There are increasing crime problems associated with the delivery of post to buildings containing multiple dwellings or bedrooms. Therefore, mail delivery that compromises the security of residential areas of a multi-occupied building in order to deliver individually to each residence is not recommended / permitted under the SBD scheme. Facilities should be provided that enable mail to be delivered to safe and secure areas. See SBD Homes 2019 V2 chapter 32.

I recommend the postal arrangements for the flats is through the wall or external 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.

Blocks of multiple dwelling that consist of over twenty-five flats, apartments, bedsits, or bedrooms, can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors of the building. In order to create a safe and secure communal environment for residents occupying blocks of multiple flats, bedsits, or bedrooms, and to reduce the opportunity for antisocial behaviour, SBD therefore seeks to prevent unlawful free movement throughout the building through the use of an access control system (compartmentalisation) by restricting access to all areas and floors of the building to all residents. The application of such is a matter for the specifier, but may be achieved by either using a combination of the following:

1. Lift and stairwell access controlled separately.
2. Lift and stairwell access jointly controlled via an additional secure door-set.

Further details can be obtained within para 27.29 SBD Home 2019 V2.

Where there is a requirement for a door-set to be both fire and security rated, e.g., flat or apartment entrance door-sets, interconnecting garage door-sets and some door-sets aiding security compartmentation, the manufacturer or fabricator supplying the finished product to site is required to present independent third-party dual certification from a single UKAS accredited certification body for both elements. This is in order to

minimise the likelihood of a door-set being presented in two differing configurations for separate fire and security tests and then later being misrepresented as one product meeting both requirements.

Where cycle security is being provided for within garages and cycle sheds within the gardens. I would like to direct the applicant to SBD Homes 2019 V2 document chapter 56 for advice on cycle security and chapter 21.9 & 54 for increasing security of the garage vehicle door-set or the interconnecting door-set to the dwelling. SBD offers specific specification advice to shed construction and cycle containers in order to provide an adequate and fit for purpose secure environment for the cycles.

Lighting is an effective security measure and a useful tool for public reassurance in that it enables people to see at night that they are safe or, to assess a developing threat and if necessary to identify a route they could take to avoid such a potential. Recent events that have made national news and become the focus of concern over safety in public places means that there is merit in recognising the enormous value people place on being able to move around in public places at night under high quality lighting systems.

I recommend that the dwelling's exterior lighting is switched by dusk till dawn lighting as opposed to passive infrared (PIR). Secured by Design has not specified PIR activated security lighting for a number of years following advice from the Institute Lighting professionals (ILP) and police concern regarding the increase in the fear of crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment. For blocks of multiple dwellings, I recommend that the main entrance lobbies are lit with dusk till dawn switched lighting with the stairwells having PIR operated lighting.

It is recognised that some local authorities have 'dark sky' policies and deliberately light some of their rural, low crime areas to extremely low levels of illumination. If this is the case, it is acceptable. However, between them, modern specialist lighting and lighting engineers are capable of achieving sufficient lighting levels without encroaching on certain dark sky policies and where possible this should be explored. Where lighting is implemented and it is recommended for this application, it should conform to the recommendations within BS5489-1:2020. 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.

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.

Sussex Police would have no objection to the proposed development as submitted from a crime prevention perspective subject to my above observations, concerns and recommendations having been given consideration.

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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