



## Local Policing Support Team

Your Ref: WD/2021/2198/MAO      Our Ref: PE/WEA/21/45/A      Date: 22<sup>nd</sup> October 2021  
Contact Name: Phill Edwards      Tel: 01273 404 535 ext: 540113      Mobile No: 07780987871

Dear Mrs Turner

**RE: Land at Bird in Eye Farm, south of Bird in Eye Hill, Framfield, TN22 5HA.**

Thank you for your correspondence of 01<sup>st</sup> October 2021, advising me of an outline planning application for the erection of up to 290 dwellings, associated landscaping, informal open space and strategic access, with access from the B2102 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](http://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 – 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 Wealden 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 always be considered.

The proposal is for a large residential development of up to 290 dwellings. It is accessed off the B2102 with a single vehicular access and a number of pedestrian access points. Parking for the development would be on-curtilage, overlooked, rear parking courts and a number of on-street parking courts. Dwellings are

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orientated to overlook the public realm and shared areas to provide a high level of natural surveillance. Robust boundary enclosure to the public realm is being considered by the applicant to add to the security provision.

The proposed development circumnavigates Bird Eye Farm. Bird Eye Farm consist of redundant farm buildings that been converted into workshops which now house a variety of small businesses. I have concerns regarding the amalgamation of the new development around the existing retail / commercial area of Bird Eye Farm. At the reserved matters stage, I would encourage the applicant to further expand on the proposed crime prevention measures using the principles of Secured by Design and the attributes of safe, sustainable places (albeit an old but very useful document).

These are: -

- Access and movement - places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- Structure - places that are structured so that different uses do not cause conflict.
- Surveillance - places where all publicly accessible spaces are overlooked.
- Ownership - places that promote a sense of ownership, respect, territorial responsibility, and community.
- Physical protection - places that include necessary, well designed security features.
- Activity - places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.
- Management and maintenance - places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

The development has the potential to impact upon the Bird Eye Farm by providing legitimate reason for accessing the location and encouraging act of criminality within Bird Eye Farm. Additionally, I recommend the SANG parking provisions are segregated from the development, removing legitimacy for accessing the development to a would-be offender from the parking court.

I was pleased to note the mention and support of SBD principles within the Design and Access Statement (DAS) submitted in support of this application.

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. Gable ended windows can assist in providing observation over an otherwise unobserved area.

Previous experience has shown that where parking courts are hidden away behind trees, shrubbery or fences they can become targets for crime. This can result in the vehicle owners deserting their designated bays and parking on the street in full view of their house, resulting in illegal parking, the obstruction of emergency and refuse vehicles as well as neighbourly disharmony

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, or timber picket fence. 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 provide access to the rear gardens the gates must be placed at the entrance to the garden, as near to the front building line as possible so that attempts to climb them will be in full view of the street and be the same height as the adjoining fence so as not to reduce the overall security of the dwellings 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

With respects to blocks of multiple dwellings regarding access control, door entry requirements and mail delivery. I direct the applicant to SBD Homes 2019 V2 chapters 21 and 32 respectively. 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.

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. All door styles and components will need to be adequately described within the scope of certification and accompanying Technical Schedule.

The DAS mentions: *The public footpath along the B2102 southside stops just before the existing field gate into the site and it is proposed to connect this path to the site to extend access into the proposed open spaces. In the south there is public footpath Framfield 65b that traverses the southern portion of the proposed SANG land. There are public rights of way in the southern parcel and the potential to create an extension to the footpath on Bird in Eye Hill which would facilitate safe walking into Uckfield town*

When introducing public footpaths into development 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.*

SBD Homes 2019 V2 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 5489-1:2013) • 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.*

SBD Homes 2019 V2 chapter 8.12. *Where isolated footpaths are unavoidable, and where space permits, they should be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles, and mobility vehicles). If 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.*

SBD Homes 2019 V2 chapter 13.1 state; *Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.*

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 and open spaces must have features which prevent unauthorised vehicular access Para 9 SBD Homes 2019.

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 to ensure that a lone dwelling will

not be adversely affected by the location of the amenity space, and it should be noted that positioning amenity/play space to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance.

Ground planting across the development 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. I would ask that consideration is given to the eventual location of any child's play area in that it is surrounded with railings with self-closing gates to provide a dog free environment.

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 54 for increasing security of the garage vehicle door-set or the interconnecting door-set to the dwelling where applicable.

Finally, lighting throughout the development will be an important consideration and where it is implemented 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.

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 being satisfactorily addressed.

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.

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



**Phill Edwards**  
**Designing Out Crime Officer**  
**Sussex Police Headquarters**