



## Local Policing Service Improvement & Engagement Department

Your Ref: DM/25/0827

Our Ref: PE/MID/25/06/A

Date 14<sup>th</sup> April 2025

Contact Name: Phill Edwards

Contact Number: N/A

Mobile: 07780987871

Dear Mr King

**RE: Land East Of Lunce's Hill, Fox Hill, Haywards Heath, West Sussex.**

Thank you for your correspondence of 01<sup>st</sup> April 2025, advising me of an outline planning application for the erection of up to 130 dwellings, together with the change of use of an existing barn for a flexible community and/or commercial use, along with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access and associated works (all matters reserved except for access) 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 at [www.securedbydesign.com](http://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 Lewes district is below average when compared with the rest of Sussex, as indicated within Police.uk. I have no major concerns with the proposals at the location, however, additional measures to mitigate against any identified local crime trends and site-specific requirements should always be considered and I would like to raise the following observations.

Mr S King  
Planning Officer  
Planning Services Division  
Mid Sussex District Council



The comments raised here regarding the above planning application have also been supplied to Lewes Local Planning Authority (LPA) as a result of an application raised to Lewes due to the close proximity and cross boundary location of the development.

There is a residential element to the development alongside a potential flexible community and/or commercial use for the existing barn. I will provide comments to both elements.

#### Residential

I would like to direct the applicant or their agent to the SBD website where the residential SBD Residential 2025 edition 1 document can be found. This document became effective from 1st March 2025.

This edition of the SBD guidance for residential properties has been designed to cater for the security of all new and refurbished homes including those for disabled and older people. The guide incorporates the latest security standards, developed to address emerging criminal methods of attack, and includes references to the Building Regulations and other statutory requirements across the United Kingdom. Constructing well-designed places, buildings and communities that promote both sustainable communities and health and well-being is an objective that Secured by Design widely supports; however, it is imperative that they must also be safe, secure, and accessible. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, cohesive, vibrant and participatory communities. It is important that proposed developments and public realm spaces and community provision are fully inclusive, created for the benefit of all, with safety and security at its core. For example, this Guide reflects upon the Home Office 'Violence Against Women and Girls' (VAWG) agenda, so that consideration is given to environmental design. This ensures such environments promote equality and are safe, inclusive, accessible, pro-social, and of high-quality, meaning that users will want to interact with the space and receive the health benefits that they have potential to offer.

#### Commercial

With respects to the potential flexible community and/or commercial use for the existing barn. I would like to direct the applicant or their agent to the SBD website where the Non-Residential SBD Residential 2025 edition 1 document can be found. This edition of the Non-Residential Guide is effective from 1st March 2025. It applies to all types of non-residential premises from small storage units to multi-use business parks and since the crime risks associated with non-residential premises can range from low to high value crimes, there can be no 'one size fits all' solution applicable to all development.

SBD Non-Residential provides a practical level of risk commensurate and sustainable security measures which are compatible and sympathetic to successful business. The majority of crimes committed on non-residential premises are property related. Among other crime types to be considered when designing non-residential properties are vandalism, graffiti, robbery, assaults on staff members, violence against women and girls, HGV theft, and cybercrime, including the Internet of Things which is covered in the Silver section of this guide under the heading 'Cyber Crime and the Internet of Things.'

The development is accessed off Lunce's Hill B2112 and leads into a single splined street layout with vehicle manoeuvring areas leading off of it. There is no through vehicle route.

The Design and Access Statement (DAS) submitted in support of the Application states

*Parking is provided on plot - either in garages or driveways to the side of properties. Overall parking provision is in accordance with the county guidance. Additionally, adequate provision for cycle storage is made for all properties to encourage use of alternative modes of transport to the car. Visitor parking along the streets has been accommodated to serve the development as a whole. Adequate provision for cycle parking and refuse storage has been made, to be provided in either garages or the back gardens of all properties.*

Despite a mention of it, I see a lack of on-street visitor parking bays within the submitted Illustrated Masterplan.



Dwellings face out onto the street creating good active frontage. The proposed parking provisions should keep the street layout and manoeuvring areas free and unobstructed. Back-to-back gardens have removed the need for vulnerable rear garden pathways.

Defensible space has the simple aim of designing the physical environment in a way which enables the resident to control the areas around their home. This is achieved by organising all space in such a way that residents may exercise a degree of control over the activities that take place there. Therefore, it is important that the boundary between public and private areas is clearly indicated. For the majority of housing developments, it will be 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 of wall (maximum height 1m) and railings or timber picket fence if a more substantial front boundary is required.

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. There may be circumstances where more open fencing is required to allow for greater surveillance. Trellis topped fencing can be useful in such circumstances, to increase the height of the boundary and make it more difficult to climb over. However, if the overall height of the boundary exceeds 2m, the national planning guidelines state that planning permission will be required.

It is recommended that all external door-sets and any easily accessible windows are 3rd party certificated. Details on recommended specifications can be found within SBD residential Guide 2025 edition 1 and Non-residential Guide 2025.

With respect to the green open space and the landscaping requirements across the development. Planting should not impede the opportunity for natural surveillance and wayfinding and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs shall be selected to have a mature growth height no higher than 1m, and trees shall have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance, by modifying the natural growth habits. As a general rule, building frontages shall be open to view except, for example, houses standing in their own private grounds. Attention shall be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property or obscure lights or Video surveillance systems (VSS) cameras.

Following the above arrangements 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 VSS, providing that someone is monitoring it at the other end of the camera at all times.

The illustrated master plan shows an area of play titled LEAP Local Equipped area of Play. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood. In order to do this, it must be carefully located to suit its intended purpose – mere residual space unwanted by the developer is very unlikely to be acceptable. See SBD Residential 2025 edition 1 section 9.

Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that local residents will not suffer from possible noise pollution. In addition, they should be sited in such a way that those using adjacent foot and bicycle paths will not be subject to harassment or otherwise be put in fear.

SBD offers specific advice to shed construction and cycle containers in order to provide an adequate and fit for purpose secure environment for the cycles.

- Visitor & residents cycle parking SBD residential 2025 edition 1 - Chapter 17 & 57.
- External cycle parking for residents in public places. SBD Residential Guide 2025 edition 1 section Chapter 64.



- It is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of any bicycle storage facilities and/or other areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion powered vehicles have been considered and specified.
- The National Fire Chiefs' Council have produced fire safety guidance for e-bikes and e-scooters, which is available at: <https://www.nfcc.org.uk/our-services/campaigns/e-bikes-and-e-scooters-firesafety-guidance> - SBD residential Guide 2025 edition 1 section 57.10
- The Bicycle Association and Cycle Rail Working Group, including Secured by Design, have published a UK quality and security standard for public cycle parking which is available at <https://www.securedbydesign.com/images/05132-Cycle-Parking-and-Security-Standards-June2021-REV-6.pdf> SBD residential Guide 2025 edition 1 section 57.11

When dealing with developments that have cycle storage facilities within the building, it is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of the cycle storage facility, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion e-bikes have been considered and specified.

SBD recommends that all street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks must comply with BS 5489-1:2020. Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements shall be discussed with the DOCO and the local authority lighting designers.

It is recognised that some local authorities have 'dark sky' policies and deliberately light some of their rural, low crime areas to very 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 some dark sky policies and where possible this should be explored. Some are currently experimenting with switching off street lamps in low crime areas between certain hours of the night in order to save energy costs and reduce CO2 emissions. If such policies exist then these must be brought to the attention of the DOCO at the time of application. Secured by Design supports the Institution of Lighting Professionals (ILP) in discouraging 'switch off' unless a full risk assessment has been carried out, and the ILP also recommends that 'switch off' never be implemented purely for cost saving. A variable controlled lighting level is always the preferred option in addition to one which does not disadvantage disabled and older people who may have a sensory impairment and require well-lit routes to enable easy wayfinding and to make other users more easily visible. Attention to position and location of lighting to improve illuminance at ground level can avoid users casting shadows onto the surface whilst minimising light pollution.

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.

Lighting provides reassurance and 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. How much light should be provided and what times these levels should be applied is a critical one for the success of a lighting strategy as it will, if correctly calculated, enhance the public's experience of an area whilst simultaneously increasing their safety in it.

Unfortunately, there are many crimes which occur during the construction phase of a development the most significant include theft of plant equipment, materials, tools and diesel fuel. 6.2 Secured by Design recommend that security should be considered throughout the life cycle of the development and in place prior and during the construction phase (inclusive of pre-enablement works). For example, this should include robust perimeter fencing of the site and (where appropriate) a monitored alarm system (by a



company or individual who can provide a response) for site cabins and those structures facilitating the storage of materials and fuel.

The developer is advised that signage should be displayed across the development (i.e. on the perimeter fencing) and should contain the emergency contact details and point of contact. This will allow both the public and staff members to report suspicious behaviour and circumstances.

Mobile or part time video surveillance systems (VSS) can be used as an effective aid to the security of a site and can act as a deterrent to criminal activity.

Further advice on construction site security can be obtained from the Secured by Design website at [www.securedbydesign.com/images/CONSTRUCTION\\_SITE\\_SECURITY\\_GUIDE\\_A4\\_8pp.pdf](http://www.securedbydesign.com/images/CONSTRUCTION_SITE_SECURITY_GUIDE_A4_8pp.pdf)

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.

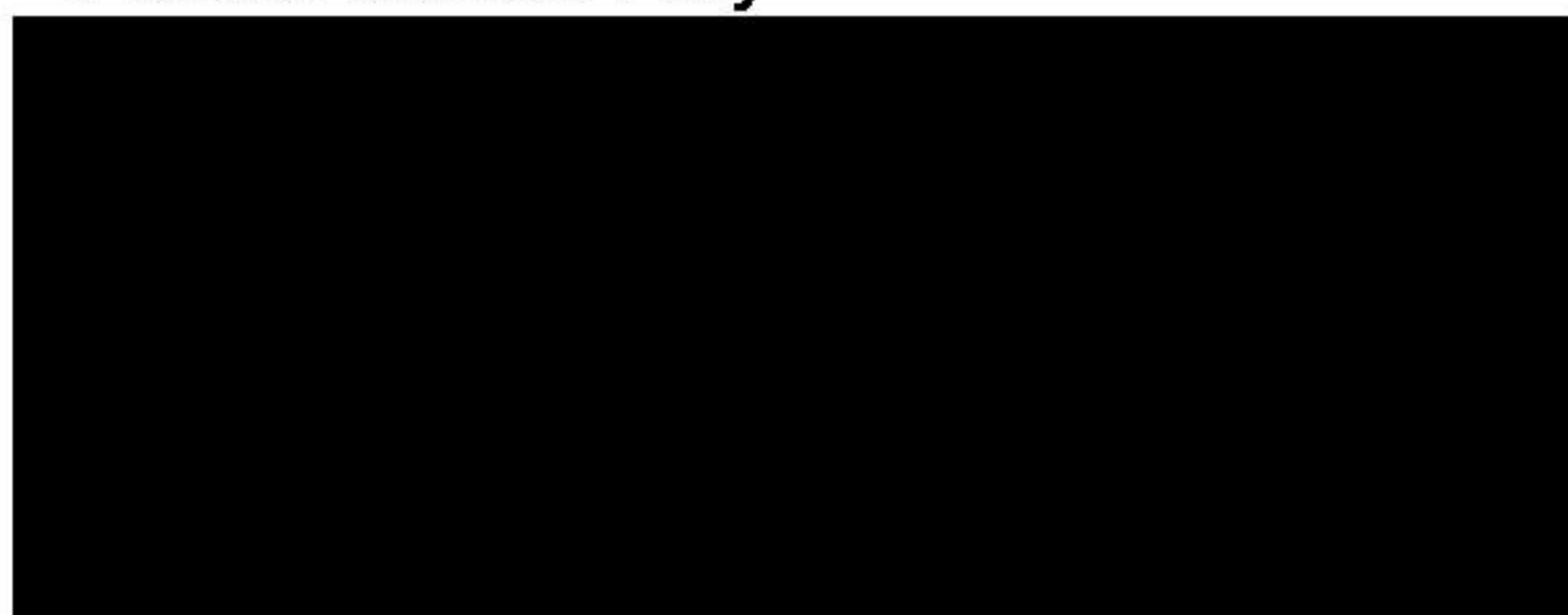
I thank you for allowing me the opportunity to comment.

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 application as submitted from a crime prevention perspective subject to my above observations, concerns and recommendations having been given due 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



**Designing Out Crime Officer  
Local Policing Service Improvement & Engagement Department  
Sussex Police Headquarters**

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