



## Local Policing Service Improvement & Engagement Department

Your Ref: DM/25/1129      Our Ref: PE/MID/25/08/A      Date: 22<sup>nd</sup> May 2025  
Contact Name: Phill Edwards      Contact Number: N/A      Mobile: 07780987871

Dear J Fisher

**RE: Land At Foxhole Farm Foxhole Lane Bolney West Sussex.**

Thank you for your correspondence of 07<sup>th</sup> May 2025, advising me of a an outline planning application for (appearance, landscaping, layout and scale reserved), for the erection of up to 200 residential dwellings, including affordable housing; a community building (use class F1) encompassing land for education provision, together with associated access, ancillary parking and landscaping; the creation of a vehicular access point from the A272 Cowfold Road, and pedestrian and cycle only access to The Street; and creation of a network of roads, footways, and cycleways through the site; together with the provision of countryside open space, children's play areas, community orchard, and allotments; sustainable drainage systems and landscape buffers 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 Mid Sussex 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,

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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.

I would like to direct the applicant or their agent to the SBD website at [www.securedbydesign.com](http://www.securedbydesign.com) 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.

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.

With respects to the Community building – The Design and Access Statement mentions- *The proposed community hub building will serve as a new headquarters for the local charity Kangaroos, replacing that which currently exists in Haywards Heath and is no longer fit for purpose. It will provide administrative and activity space, including:*

- *Two activity rooms (with ability to open up into 1 single larger space)*
- *Sensory gym*
- *Treatment room*
- *Learning kitchen*
- *Staff office and meeting room*
- *Reception area*
- *Accessible & Changing Places WCs*

*The proposed facility is sustainably located in the north-east of the Site, adjacent to the new pedestrian/cycle link to The Street and serving as focal point marking the entrance to the northern development parcel.*

I would like to direct the applicant or their agent to the SBD website where the SBD Non-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 site is accessed off Cowfold Road in the south of the proposed development with a single vehicle and pedestrian entranceway with no through vehicular route. There are additional proposed cycle and pedestrian footpaths that feed into and out of the development from different elevations. The design and layout has essentially created two residential areas, one in the south and the other in the north. Each are linked by a single road. Each area has a number of open green spaces and children's play areas. The numerous access points make this a permeable development.

It would appear that the presence of back-to-back gardens have eliminated the need for vulnerable rear gardens and easy access accessible access to the subsequent ground floor door-sets and windows. In the

main the dwellings face out onto the street and road layout. This creates a good active frontage and provides good levels of natural surveillance over the street and manoeuvring areas.

Parking is being provided within garage / car barns, on-curtilage, rear parking bays and a number of on-street bays. Where communal parking areas are necessary, bays shall be sited in small groups, close and adjacent to homes, be within view of active rooms and clearly marked, so that it is obvious which parking spaces belong to which dwellings. *The word 'active' in this sense means rooms in building elevations from which there is direct and regular visual connection between the room and the street or parking court. Such visual connection can be expected from rooms such as kitchens and living rooms, but not from more private rooms, such as bedrooms and bathrooms.*

Rear parking courtyards are discouraged for the following reasons:

- They introduce access to rear elevations, which may leave dwellings vulnerable to burglary.

In private developments, such areas are often left unlit and therefore increase the fear of Crime.

- Ungated courtyards provide areas of concealment which can encourage anti-social behaviour.

In order to create a safe and secure environment for the vehicles and their users, I recommended that communal parking facilities are lit to the relevant levels as recommended by BS 5489-1:2020 (design of road lighting and public amenity areas).

For the residential dwellings, it is recommend 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.

Where there are communal entrance door-sets for apartments, door-sets that are fitted with electronic locks or electronic staples must form part of the manufacturers certified range of door-sets. Where there is a requirement for a door-set to be security, fire and smoke rated, e.g. flat or apartment entrance door-sets, interconnecting garage door-sets, some door-sets aiding security compartmentation and/or meet a building regulation requirement, the manufacturer or fabricator supplying the finished product to site is required to present independent third-party certification from a single UKAS accredited certification body satisfying all the performance elements. This is in order to minimise the likelihood of a door-set being presented in varying configurations for separate security, fire and smoke tests and then later being misrepresented as one product meeting all requirements. It is recognised that there are occasions where a door-set may only be required to be fire and security rated (not smoke).

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.

Front garden planting of feature shrubs and suitable trees (e.g. open branched or light foliage, etc.) will also be acceptable provided they are set back from paths and placed to avoid obstructing visibility of doors, windows and access gates to the rear of the property. Similarly, planting which allows a clear line of sight to the pavement and road is preferable.

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. 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 as well as suppling surveillance through the trellis. However, if the overall height of the boundary exceeds 2m, the national planning guidelines state that planning permission will be required.

Gates to the side of dwellings that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked (operable by key from both sides of the gate). Such gates must be located on or as near to the front of the building line as possible

Whilst it is accepted that through routes will be included within 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 (Note 8.4). Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity are desirable as they have both been proven to deter criminal behaviour.

*Note 8.4: The Design Council's/CABE's Case Study 6 of 2012 states that: "Permeability can be achieved in a scheme without creating separate movement routes" and notes that "paths and pavements that run as part of the street to the front of dwellings reinforce movement in the right places to keep streets animated and do not open up rear access to properties."*

Given the quantity of access point and inks into and out of the development makes this a permeable development. A review of available research in this area concluded that: *"Neighbourhood permeability... is one of the community level design features most reliably linked to crime rates, and the connections operate consistently in the same direction across studies: more permeability, more crime. Several studies across several decades link neighbourhood property crime rates with permeability versus inaccessibility of neighbourhood layout. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates"*

*Source: Taylor R B 2002 "Crime Prevention Through Environmental Design (CPTED): Yes, No, Maybe, Unknowable, and all of the above" in Bechtel RB (ed) "Handbook of Environmental Psychology", John Wiley, New York, Pages 413 – 426. Cited by Professor Ted Kitchen Sheffield Hallam University 2007.*

Where isolated footpaths are unavoidable, and where space permits, it is recommended that they shall be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, bicycles 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.

Consideration is to be given to restrict vehicles accessing the open spaces and remove the potential for rogue camping or parking/dumping of vehicles. This is easily achieved by a small ditch and berm. With respect to the green open spaces 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.

Due to the development having a potential for play area and green spaces. Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour. The design and layout of play spaces will vary depending on the age requirements.

The various types of play spaces are referred to as:

- Local Areas of Play (LAP) – primarily for the under 6-year-olds
- Local Equipped Area for Play (LEAP) – primarily for children who are starting to play independently
- Neighbourhood Equipped Area of Play (NEAP) – primarily for older children

- Multi-Use Games Areas (MUGA) – primarily for older children

Facilities 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 shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.

Where cycle security is being offered within the development. 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

Where sheds are provided for bicycle parking, they shall be certified to Sold Secure SS301 Bronze, or above and securely fixed to a suitable substrate foundation in accordance with the manufacturers' recommendations. Section 64.7.

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.

SBD recommends that all street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks should comply with BS 5489-1:2020. 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.

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.

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.

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



Phill Edwards

**Designing Out Crime Officer  
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