



Local Policing Service Improvement & Engagement Department

Your Ref: DM/25/0016

Our Ref: PE/MID/25/03/A

Date 14th February 2025

Contact Name: Phill Edwards

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Dear Mr King

RE: Land west of Turners Hill Road and north of Huntsland, Turners Hill Road, Crawley Down, West Sussex, RH10 4HB.

Thank you for your correspondence of 05th February 2025, advising me of a outline planning application for (appearance, landscaping, layout and scale reserved) for the erection of up to 150 dwellings, a 65 bed care home, and community facility, and associated infrastructure including new access points off of Wychwood with associated spine road and car and cycle parking, together with provision of open space, play facilities, utilities infrastructure, surface water drainage features, and associated works 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 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.

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

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 where the residential SBD Homes 2024 document can be found. This document became effective from 1st March 2024. The Secured by Design scheme is a Police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. SBD is owned by the UK Police Service and is supported by the Home Office, Building Control departments in England (Part Q Security – Dwellings). The advice given in this guide has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure, and sustainable environments. I offer the following comments from an SBD perspective as compliance with and along with a successfully gained SBD award fully discharges the requirements of ADQ.

Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that SBD 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. SBD Homes 2024 Preface page 2.

The Design and Access Statement (DAS) submitted in support of this application has provided the following information.

The application site will include pedestrian connections into the site via Huntsland as well as a further connection to the site edge adjacent to footpath 35W. A shared pedestrian and cycle connection will also provide access to the northern boundary of the site, able to tie into future development at the Hurst Farm allocation (DPA10).

APARTMENT DESIGN

All flats, including those above garages and maisonettes within the development should be designed with a dual aspect. Communal spaces will be provided to the same quality and protection as a dwelling house. Additionally, small, secure and well landscaped car parks will be provided for residents.

BLOCK STRUCTURE

The arrangement and organisation of blocks within the development should promote positive building frontages onto all streets and spaces, provide defensible space at the front of dwellings units and for all ground floor apartments, establish clear and appropriate boundaries between private and public areas and avoid blank facades facing public spaces and streets.

PERMEABILITY

The design of streets, routes, and pathways within Land west of Turner's Hill Road and north of Huntsland should aim to follow desire lines and provide clear and obvious access to key destinations such as green spaces and play areas. The routes should be designed to create safe, secure and inclusive environments, utilising natural surveillance and appropriate lighting.

PARKING

The provision of parking at Land west of Turner's Hill Road and north of Huntsland should be conveniently located for all residents and visitors and assimilate with the street scene through suitable visual mitigation such as planting. Parking provision and arrangement should prevent ad-hoc parking and offer a range of parking typologies and solutions including on-street, on-plot and within secure, private, allocated parking courts. Additionally, small, secure and well landscaped car parks will be provided for residents. Parking will be primarily located on plot, with some use of rear parking courts associated with FOG arrangements. Any garages to be recessed behind the building line. Frontage parking should be limited.

BUILDING HEIGHTS

Building heights of up to two and a half storeys

BOUNDARY TREATMENTS AND SETBACKS

Front gardens will generally be around 2m in size. They will be characterised by soft planted areas, with some featuring hedge boundaries where possible

I recommend that the development has outward facing dwellings with back-to-back gardens which will create good active frontage resulting with the streets and the public areas being overlooked. Back-to-back gardens will eliminate the need for vulnerable rear garden pathways. Where parking is provided with on-curtilage, garage & car barn parking and overlooked on- street parking bays they should be within view of active rooms, this should leave the street layout free and unobstructed.

Where communal parking areas are necessary, bays should be sited in small groups, close and adjacent to homes, be within view of active rooms (Note 16.2) and allocated to individual properties. *Note 16.2: 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.* Advice on electric vehicle charging in secure communal parking areas can be found within SBD Homes 2024.

SBD discourages rear parking courtyards for the following reasons:

- They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated.
- 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.

Where rear parking courtyards are considered absolutely necessary, they are to be protected by a gate.

Where there are blocks of multiple dwellings within the development. I recommend that the applicant or their agent look at the recommendations for access control and door entry requirements, post and parcel delivery and lightweight framed wall design within SBD Homes 2024.

With regard to the blocks of multiple dwellings. From a crime prevention perspective, it will be imperative that access control and a door entry system 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 2024 section 29, 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 blocks of multiple dwellings serving 11 dwellings or more see SBD Homes 2024- More frequently.

Where there is a requirement for a door-set to be fire, smoke and security rated, e.g., communal entrance, flat, apartment or housing 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 fire, smoke and security 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). This would apply to windows as well.

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.

Dwellings front boundaries. 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 provide access to rear gardens or yards they 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. They must not be easy to climb over or crawl under or removed from their hinges. On outward opening gates, where the hinges/ brace is mounted on the attack face, fixings should be of a galvanised coach bolt design. Hinge systems must not allow the gate to be 'lifted off' and therefore should employ a method to restrict the removal of the gate from the fence post or wall.

Care Home response.

The proposal includes the erection of a new 65 bed care home within the development. Accredited products that are fit for purpose and appropriate, along with natural surveillance and access control will assist the building in creating a safe and secure environment for the residents and staff of the care home.

Where communal parking occurs on the site, 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. For Electric vehicle charging areas. See section 16.

From a crime prevention perspective, it will be particularly important that access control is implemented into the design and layout to ensure control of entry is for authorised persons only. Tradesperson buttons are not permitted as they have been proven to be the cause of anti- social behaviour and unlawful access to communal development. Door sets that are fitted with electronic locks or electronic staples must form part of the manufacturers certified range of door-sets. Internal control may be necessary to separates residential elements of the building from public / communal elements of the care home.

With respects to the Care Home, I recommend that all external fire doors are to be devoid of any external furniture and linked back to security or be alarmed to indicate when the door is opened or left ajar. Signage adjacent to the door is to be available to inform users of the consequences of misuse.

Where there is a requirement for a door-set to be both fire and security rated, e.g., communal entrance door-sets, 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.. This would apply to windows as well.

It is important that the boundary between public space and private areas is clearly indicated. Vulnerable areas, such as exposed side and rear gardens and perimeter boundary treatments need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. Appropriate physical measures in the form of fencing treatment should be implemented to remove easy access to the rear of the development and access to the vulnerable rear doors and windows.

Development in general.

It is important that the boundary between public space and private areas is clearly indicated. Vulnerable areas, such as exposed side and rear gardens and perimeter boundary treatments need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. Appropriate physical measures in the form of fencing treatment should be implemented to remove easy access to the rear of the development and access to the vulnerable rear doors and windows.

Communal areas and play areas. LAPS, LEAPS & NEAPS across the development.

Poorly designed and specified communal areas, such as playgrounds, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour. These may often be 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 should 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.

The provision of inclusively designed public open amenity space, 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.

- The open space must be inclusively designed with due regard for wayfinding, permeability, and natural surveillance.
- Adequate mechanisms and resources must be put in place to ensure its satisfactory future management and maintenance.
- Care should be taken to ensure that a lone dwelling will not be adversely affected by the location of the amenity space.
- 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.

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.

This is a permeable development with numerous access points into and out of the development on all elevations. 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. There are advantages in some road layout patterns over others especially where the pattern frustrates the searching behaviour of the criminal and their need to escape. 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 8.3).

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

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"* SBD Homes 2024 section 8.4.

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.

SBD acknowledges and recognises the need for the use of attractive, well-designed, clear, and legible pedestrian and cycle routes, and high-quality public space which encourages the active and continual use of public areas. Therefore, in order to create a safe and secure environment SBD offers the following advice.

Footpath and bicycle route design- Routes for pedestrians, cyclists and vehicles should be integrated and assist easy, intuitive wayfinding through the application of inclusive design by increasing activity and therefore natural surveillance, proven deterrents for crime and anti-social behaviour.

As stated in the Department for Transport Local Transport Note 1/20 (July 2020) Cycle Infrastructure Design: "Cycle networks should be planned and designed to allow people to reach their day-to-day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality."

Public footpaths should not run to the rear of, and provide access to gardens, rear yards, or dwellings as these have been proven to generate crime. Where a segregated footpath is unavoidable, for example where there is 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 (see paragraphs 8.20 to 8.22).
- 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 2024 section 8.

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, 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.

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 & Internal cycle parking SBD Homes 2024 - Chapter 17.
- External cycle parking for residents in public places. SBD Homes 2024 section Chapter 64.
- Sheds used for bicycle parking – SBD Homes 2024 section 64.4.
- External Garage door-sets – SBD Homes 2024 - Chapter 23.10 & chapter 62.
- Where developments have e-bike storage facilities within the buildings, it is recommended that the developer or developer's agent's informs 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.

The above would also apply should an electric buggy store be considered within the care home.

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 should be selected to have a mature growth height no higher than 1m, and trees should have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1m clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance. As a general rule, building frontages should be open to view except, for example, houses standing in their own private grounds. Attention should 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 CCTV 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 CCTV, providing that someone is monitoring it at the other end of the camera at all times.

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 exterior lighting is switched using a photo electric cell (dusk to dawn) with a manual override or via a Central Management System (CMS) for large scale developments 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. Where blocks of multiple dwellings are present, I recommend that the main entrance lobbies and stairwells are lit with dusk to dawn, vandal resistant, energy efficient, switched 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 some 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. It is for wayfinding only.

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. Construction sites whether exceptionally large developments or small 2-3 dwelling developments, often suffer from theft, criminal damage, arson, and anti-social behaviour, all of which can have a major impact on completion dates and overall development costs.

SBD Construction Site Security Guide 2021 is designed to be risk commensurate and provides advice on how to secure the site from the moment the hoarding goes up until the moment the development is handed over to the client or end user. The advice is based on proven crime prevention principles that are known to reduce criminal opportunity by creating safer, more secure, and sustainable environments. It applies to all construction sites regardless of their size and is intended for all staff including security personnel. It can be found on the SBD website.

It is recommended that contact is sought by the developer with the local Neighbourhood Police Team (NPT) to establish good relations and rapport whilst the development is in the construction phase.

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

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



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