



Local Policing Support Team

Your Ref: DM/22/2416 Our Ref: PE/MID/22/13/A Date 15th August 2022
Contact Name: Phill Edwards Tel: 01273 404 535 ext: 540113 Mobile No: 07780987871

Dear J Fisher

RE: Land South Of Henfield Road, Albourne, West Sussex.

Thank you for your correspondence of 04th August 2022, advising me of an outline planning application for outline planning permission for the erection of up to 120 residential dwellings including 30% affordable housing, public open space, and community facilities. All matters are 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 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.

With the level of crime and anti-social behaviour in the Mid Sussex 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 and I would like to raise the following observations and recommendations.

J Fisher
Planning Officer
Planning Services Division
Mid Sussex District Council

I was pleased to see mention of SBD within the Design and Access Statement (DAS) submitted in support of this application. I welcome the prospect of interacting with the applicant / developer to assist in creating a safe, secure, and sustainable development.

The proposed development of 120 dwellings has vehicle access off Henfield Road with no through vehicle route. There is a proposed separate pedestrian access into the development from The Street. There is an existing Public Right Of Way (PROW) that runs west to east on the southern boundary of the southernmost dwellings. Pedestrian routes throughout the site are being proposed to link the proposed new homes with the community space and the wider area.

In the main dwellings face outwards on the streets and manoeuvring areas, creating good active frontage with the street layout being overlooked. The design and layout have in main all but eliminated the need for vulnerable rear garden pathways with back-to-back gardens. However, they are present due to two sets of terraced housing with rear access pathways located behind them. Parking on the development has been provided with garage, on-curtilage, rear parking courts, on-street parking bays and the potential for the creation of a parking/drop-off to Albourne Primary School, adjacent to a potential community shop on the north eastern corner of the development.

I have concerns over the proposed parking square as shown within the illustrative masterplan adjacent to Albourne Primary School, where a new pedestrian access would be created. The illustrative masterplan indicates 30no. parking spaces in this square, with an 'in and out' system forming a loop through the residential development to assist increased movement at drop-off and pick-up times for the school

My concerns regarding the parking / drop off area for 30 cars are, it has the potential to encourage; unobserved vehicle crime at this location, easy legitimate access into the development from a would-be offender, rogue parking, dumping of vehicles and illegal parking, unless a suitable and adequate parking strategy is implemented. I also have concerns for the amount of traffic that will occur twice daily, circumnavigating the small number of dwellings within the proposed loop created by the 'in and out' system. This has the potential to impact upon the amenity of the residents living here.

The rear parking courts shown on the site plan provide access to the vulnerable rear gardens of a number of properties and subsequently the vulnerable ground floor doors and windows of said properties. Therefore, 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.

I was pleased to see that the dwelling's front 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, they 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 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.

Where blocks of multiple dwellings are being considered within the development. 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.

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. This would apply to windows as well.

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. 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 externally mounted 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.

Where cycle security is being considered 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 and the dwelling's interconnecting door-set if fitted.

When introducing public footpaths into a 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 8.12 *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.*

Communal areas, such as playgrounds, toddler play areas, seating facilities and open spaces 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.

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. SBD Homes 2019 V2 chapter 9.

In order to ensure that there is as much natural surveillance across the development as possible, ground planting 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. 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.

The Design and Access Statement submitted (DAS) in support of this application mentions that; *dwellings will have individual lights fitted to dwellings with PIR to reduce energy consumption and compact fluorescent lamps will be fitted.*

I recommend that the dwelling lighting is switched by dusk till dawn lighting as opposed to PIR. SBD has not specified PIR activated security lighting for a number of years following advice from the 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.

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.

It is also 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, this will be acceptable. Where it is implemented and it is recommended for this development, especially within the rear parking courts, 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 have 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
Sussex Police Headquarters

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