



SUFFOLK CONSTABULARY

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For the attention of Chris Rand

Gt Wilsey Park Development, Little Wratting

Thank you for this consultation and the opportunity to comment.

I would like to register my approval of many facets of the plan – it is apparent that all concerned are mindful of the requirements to provide a safe and secure development.

I would hope the developer applies for Secured by Design accreditation at this site, as a means to provide an indication of quality.

It is now widely accepted that a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour.

Information.

National legislation that directly relates to this application

Section 17 of the 'Crime and Disorder Act 1998' places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

Despite other legislative considerations within the planning process, there is no exemption from the requirement of Section 17 as above. Reasonable in this context should be seen as a requirement to listen to advice from the Police Service (as experts) in respect of criminal activity. They constantly deal with crime, disorder, antisocial acts and see on a daily basis, the potential for 'designing out crime'.

This rationale is further endorsed by the content of PINS 953.

National Planning Policy Framework.

Paragraph 58 states:-

"Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion".

Paragraph 69.

This paragraph looks towards healthy and inclusive communities. The paragraph includes:-

"Planning policies and decisions, in turn, should aim to achieve places which promote:

Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion"

My response includes both generic and site specific recommendations below.

Generic recommendations.

- 1. The physical security element of the application should not be overlooked. There are British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 2. Fencing Divisional fencing at the 'bottom of the garden' should be of an 1800mm close boarded style, as proposed. Sub divisional fencing, (plot division) the 'side of garden' boundary should be a 1500mm close board topped with a 300mm trellis. This minor change to the fencing detail should be negotiated in as it allows for a better level of neighbour surveillance without adversely affecting privacy. Privacy panels can be included (a full 1800 close boarded across paths and patios etc.) where necessary.
- 3. Trees should allow, when mature, crown lift with clear stem to a 2 metre height. Similarly, shrubbery should be selected so that, when mature, the height does not exceed 1 metre, thereby ensuring a 1 metre window of surveillance upon approach whether on foot or using a vehicle.
- 4. Street lighting should conform to the requirements of BS 5489:2013. A luminaire that produces a white light source (Ra>59 on the colour rendering index) should be specified but luminaires that exceed 80 on the colour rendering index are preferred.
- 5. Individual properties should have rear aspect lighting installed. An electrically photocell operated wall mounted fitting, (a dusk to dawn light) complete with a compact fluorescent lamp and wired through a switched spur allows the choice to the resident whether to illuminate or not. If the choice is to illuminate, then control is achieved by the photocell which only switches on when required.

All the above should be required in order to comply with paragraph 58 of the NPPF.

Secured by Design aims to achieve a good overall standard of Security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety.

Cul-de-sacs that are short in length and not linked by footpaths can be very safe environments in which residents benefit from lower crime. Research shows that features that generate crime within cul-de-sacs invariably incorporate one or more of the following undesirable features:

- backing onto open land, railway lines, canal towpaths etc, and/or
- are very deep (long)
- linked to one another by footpaths.

If any of the above features are present in a development additional security measures may be required. Footpaths linking cul-de-sacs to one another can be particularly problematic, and in such cases the layout may need to be re-considered (particularly in higher crime areas).

The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars.

We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. There is no blanket approach, site specifics apply, based on the crime rate and local context.

It is important to avoid the creation of windowless elevations and blank walls adjacent to public spaces; this type of elevation, commonly at the end of a terrace, tends to attract graffiti, inappropriate loitering and ball games. The provision of at least one window above ground floor level, where possible, will offer additional surveillance over the public area.

Where communal car parking areas are necessary they should be in small groups, close and adjacent to homes and must be within view of the active rooms within these homes. It may be necessary to provide additional windows to provide the opportunity for overlooking of the parking facility.

Rear car parking courtyards are discouraged 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
- Particularly where un-gated the courtyards provide areas of concealment which can encourage anti-social behaviour

Experience shows that incorporating security measures during a New Build or Refurbishment reduces crime, fear of crime and disorder. The aim of the Police

Service is to assist in the Design process to achieve a safe and secure environment for Residents and Visitors without creating a 'Fortress environment'.

New Homes 2014 guide is available from www.securedbydesign.com which explains all the crime reduction elements of the scheme.

Site specific observations

Policy DM7: Sustainable Design and Construction

All new non-residential development over 1,000 sq m will be required to achieve BREEAM excellent standard or equivalent unless it is not possible to meet one or more of the mandatory credits due to constraints inherent within the site; or it would compromise viability.

Secured by design Commercial Guide is available on www.securedbydesign.com

I would be please to work with the agent and/or the developer to ensure the proposed development incorporates the required elements. This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of crime.

If you wish to discuss this further or need help with the SBD application please contact me on 01284 774276.

Yours sincerely

Heather Highton 21/12/15