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**Planning Application:** DC/19/1940/RM

**Proposal:** Reserved Matters Application - Submission of details under Outline Planning Permission DC/15/2151/OUT (Residential development of up to 2,500 units (within use classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure) Submission of details for the reserved matters access, appearance, landscaping, layout and scale for 503 dwellings (parcels A1, A2 and A8) and associated internal roads, car parking, landscaping, amenity and public open space. Application to Partially Discharge Conditions 4 (Updated survey information), 6 (waste and recycling), 7 (Landscape and Ecological Management Plan), 8 (Landscape), 15 (Open space strategy), 28 (Garage /parking provision), 30 (Travel Plan - Residential), 40 (Arboricultural method statement), 42 (Ecological implementation strategy), and 45 (Biodiversity monitoring) of DC/15/2151/OUT.

**Location:** Land Ne Haverhill Wisley Road Little Wratting Suffolk

**Applicant:** Mr Chris Gartland - Redrow Homes Ltd

**Planning Officer:** Penny Mills

Dear Mrs Mills

Thank you for allowing us to comment on the above Reserved Matters planning application.

Secured By Design principles and guidance held within the Secured by Design Homes 2019 document (SBD H 2019) also aim to reduce the level of crime and provide a safe and secure environment. SBD objectives is 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. Experience shows that building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75%.

It is recommended that the developer seek to achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:

- *All exterior doors to have been certificated by an approved certification body to BS PAS 24:2016, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.*
- *All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).*
- *Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2016, or STS204 issue 3:2012, or LPS1175 issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.*

**CRIME LEVELS:** The Crime Stats within a mile radius of Wisley Road, Haverhill for the period of December 2018 to November 2019 are 54 crimes in total. The highest proportions of crime relevant for this development are: ASB 7, Burglary 7, Criminal Damage and Arson 4, Public Order 2, Vehicle crime 1, and other crimes 33. Crime Levels are relatively low in this area due to it being under-developed and mostly farm land. Haverhill suffers from crime such as burglary, robbery and ASB. **It is therefore important that Secured by Design principles are followed in order to prevent creating crime issues and ensuring the security and safety of residents in this large new development.**

We have reviewed the plans, planning statement and DAS and would welcome working with the developer and planners in order to offer support on Secured by Design (SBD) and Crime Prevention through Environment Design (CPTED) principles.

The following recommendations are in line with Secured by Design Homes 2019 principles:

**Following generic recommendations are in accordance with Secured by Design Homes 2019 and apply to Phase A1, A2 and A8.**

1. The physical security element of the application should not be overlooked. There are British Standards (PAS 24:2016) for doors and windows that ensure that the installed items are fit for purpose and preferably to Secured by Design standards.
2. **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. A sustainable maintenance and management programme should be agreed upon for open space areas. See SBD H 2019 Section 17.
3. **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 and in accordance with SBD H 2016 30 and for Street Lighting SBD H 2019 18.
4. **Sheds/Cycle storage**: Should comply with SBD H 2019 56 or Section 57 and be fitted with mortise locks and appropriate ground anchors for cycle storage.
5. **Defensive Planting** for dwellings abutting open space areas and footpaths should conform to SBD H 2019 Section 8, Section 12.2.1, Section 17 Planting in New Developments.
6. **Fencing/Gates**: should conform to 1.5 m high close board with 300 m trellis or 1.8 m close board fencing with gates of the same height. See Section 10 of SBD H 2019 for full compliance of dwelling boundaries.

**A1- 62 Dwellings (All Private)( Design Out Crime Officer Jackie Norton )**



The design and layout of this Phase is recommended within Secured by Design Homes 2019 (SBDH 2019) in that it has one vehicular way in and out. SBDH 2019 8 highlights Through Roads and cul-de-sacs. There is clear definition of public and private and shared road areas. The dwellings have individual access to rear gardens and no long rear access paths.

There are some areas that are of concern in regards to Crime Prevention through Environmental Design and Secured by Design Principles and guidance. It is recommended that these are reviewed in order to reduce the opportunity for crime.

1. **GARAGES**: There are some garages that are set away from the dwelling which is not recommended as this reduces surveillance to them. Those of concern are: Plots 6 and 40. SBDH 2019 recommends that vehicles should be parked in locked garages or on a hard standing within the dwelling boundary. See SBDH 2019 Section 16. 1. And 16.2 which stipulates that the entrance should be easily observed from the street and neighbouring dwellings.

A lot of the garages are considerably set back considerably from the dwellings. SBDH 2019 Section 16.6 states that where parking is designed to be adjacent to or between units, a gable end window should be considered to allow residents an unrestricted view over their vehicles. **It is recommended that those dwellings are designed to have such windows.** An example of those types of dwellings are: Plots 16, 10 etc



2. **OPEN SPACE AREA/COMMUNAL AREAS**: This area is secured with estate fencing, gated and has good surveillance to it from dwellings. There will be 5 seating areas within the it. However, these types of areas can lend themselves to have the potential to generate crime, the fear of crime and anti-social behaviour. Please see

SBDH 2019 Section 9.3.3 in regards to dwellings positioned close to such areas. It is recommended that Section 9 in whole is reviewed in regards to crime issues that could occur from the area. See SBDH 2019 Section 8.19 for lighting of footpaths within this area and that the seating areas are in line with SBDH 2019 Section 8.18.1 through to 8.18.7. in particular consideration for use of single seats or stools rather than benches to reduce the opportunity for loitering and for such seating to be vandal resistant.

3. **MAINTENANCE AND MANAGEMENT OF WOODED AND COMMUNAL AREAS:** these areas should have a Maintenance and Management plan in place that will ensure the maintenance and management of the planting in those areas so that they do not provide restriction of surveillance or allow for areas of hiding in. This plan should be sustainable for the long term.

4. **CYCLE ROUTES:** The main entrance and exit cycle routes are restricted with a bollard however it is recommended that consideration of metal staggered railings are installed at these main points. This will reduce the speed of cycles and anyone causing ASB on them as well as reduce the speed of any potential offender trying to escape from a police response.

Cycle routes throughout the wooded area that links Phase A1 and A2 should not be obstructed by planting and ensure that areas close to the path cannot be used to hide in.



**A2 – 172 Dwellings (36 affordable) (Design Out Crime Officer Jackie Norton):**

The design and layout of this Phase has more permeability to it with 4 points of entry/exit.

Those dwellings that are detached or semi-detached are positioned so that they reduce the permeability to the rear of the dwellings.

There are some areas that are of concern in regards to Crime Prevention through Environmental Design and Secured by Design Principles and guidance. It is recommended that these are reviewed in order to reduce the opportunity for crime.

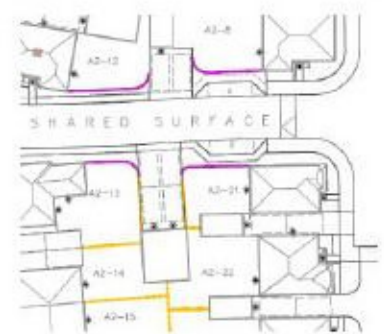
1. **GARAGES:** There are some garages that are set away from the dwelling which is not recommended as this reduces surveillance to them. some of those are have walls for boundaries which further reduces any opportunity for surveillance. Those of concern are: Plots 12, 8, 13, 21.

A lot of the garages are considerably set back from the dwellings. SBDH 2019 Section 16.6 states that where parking is designed to be adjacent to or between units, a gable end window should be considered to allow residents an unrestricted view over their vehicles. **It is recommended that those dwellings are designed to have such windows.**

Some examples are 33,32,31,30, 29,28, 10, 11 etc

2. **OPEN SPACE AREA/COMMUNAL AREAS:** This area is secured with estate fencing, gated and has surveillance to it from dwellings. There will be seating areas within the area. However, these types of areas can lend themselves to have the potential to generate crime, the fear of crime and anti-social behaviour. Please see SBDH 2019 Section 9.3.3 in regards to dwellings closed by to such areas. It is recommended that Section 9 in whole is reviewed in regards to crime issues that could occur from the area. See SBDH2019 Section 8.19 for lighting of footpaths within this area and that the seating areas are in line with SBDH 2019. Section 8.18.1 through to 8.18.7. in particular consideration for use of single seats or stools rather than benches to reduce the opportunity for loitering.

3. **BRICK WALLS:** Where there are brick walls throughout the phase there should be defensive planting along the boundary to ensure that the areas do not lend themselves to ASB ball games or graffiti. See SBD H 2019 Section 12.2. and 12.2.1 and 12.2.2.



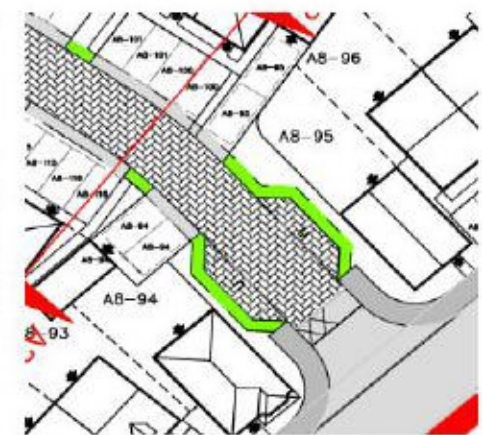
4. **FLATS:** The flats located for **Plots 58-67 and 68-76** have rear and side parking. Rear Parking is not recommended within SBDH 2019 as they introduce access to the vulnerable real elevations of dwellings, they are often unlit and therefore increase the fear of crime or can provide areas of concealment which can encourage ASB (see Section 16.3 of SBDH 2019). **The design of Plots 58-67** has lots of recess areas which could restrict natural surveillance or allow hiding areas. It is therefore important to ensure that gable end windows are situated so that there is surveillance into the recessed areas see SBDH 2019 Section 12. Flat 67 is a FOG (flying freeholds) and is also not recommended as undercroft areas can cause criminal activity with ASB or arson. **If the parking and undercroft are to remain within this design and as there are gardens abutting the parking area, then it is recommended that it is gated to secure the parking and reduce the access to the under-croft area in accordance with SBDH 2019 Section 16.4.** The police actively discourage these types of parking and dwellings as they suffer from theft of and from motor vehicles, along with criminal damage, anti-social behaviour, drug taking, graffiti and arson, as they allow an offender to go about undetected due to a lack of any form of surveillance from any surrounding properties

They must also comply with SBDH 2019 Section 24, 25.3, 26, 27, 27.10 through to 27.13 in relation to light framed walls, lighting, access control, meters etc. The doors should be sprung closing to ensure that they close after entry and not allow for un-authorized access by non-residents. Mail delivery for the flats must be considered and comply with SBDH Section 32.

5. **COMMUNAL CYCLE AND BIN STORAGE:** These must comply with SBDH 2019 Section 56.1 and supplied with some form of access control for residents only in order to reduce the opportunity for ASB gathering in them or the potential for Arson. Doors should be spring closing and have a thumb turn release so that if someone has been inadvertently shut in.

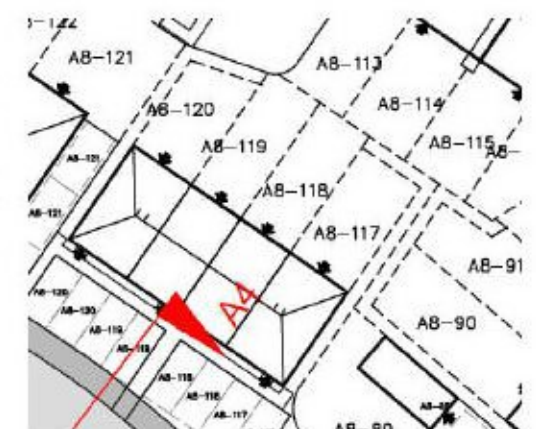
### **A8 - 269 DWELLINGS (Design Out Crime Officer Phil Kemp):**

1. Police prefer every property to have their own garage and that all garages are flush to the side of properties, in order to allow good surveillance and reduce the risk of creating areas where an offender can be obscured from view. It is noted that a number of properties will not have their own garages, which is disappointing. It is also noted that a number of properties will have set back garaging, to allow further hard standing parking. These include A8 plots A1-A5; A7-A8; A13-A14; A17-A22; A25-A28; A32; A39- A40; A51; A61-A63; A66; A71; A89; A95; A131-A135; A151; A154; A188-A198; A201; A211-A212; A220- A223; A231-A233; A236; A239-A244; A247-A254; A257-A266.
2. Having all these garages set so far back with no surveillance available from any properties, heightens the risk that an offender could enter the rear of a property without being seen, which is the more common method of entry preferred by most offenders. (Secure By Design (SBD) Homes 2019, pages 22-23, para 16.1- 16.11 and page 66, para 55.1 refers).
3. Plots 94-95 have rear parking, with no surveillance available from any active rooms. For the same reasons previously stated I have concerns that by incorporating such designs they could very well become generators for car crime and anti-social behaviour (SBD Homes 2019 (V2), pages 22-24, paras 16.1-16.16 and pages 66-67, at paras 55.1-55.2 refers).



The police do not recommend rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, antisocial behaviour (including the gathering of groups of people) and graffiti. These areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties and heighten the perceived threat of crime to residents and users. The areas need to be well-lit in accordance with BS5489:2013 and further surveillance offered from neighbouring properties, with rear fencing capped to 1.5m and topped with 300mm trellis. (SBD Homes 2019, page 22, para 16.3-16.4 refers).

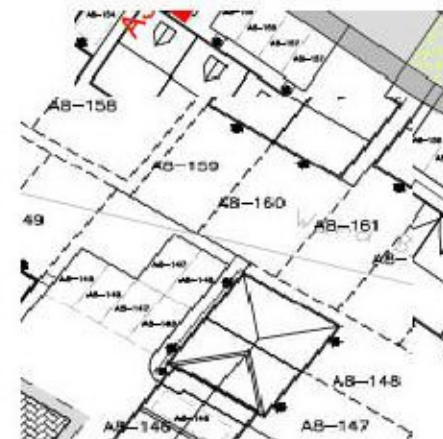
4. A number of plots have alleys incorporated, including double alleys, side by side, including by the side of rear of plot A117 to access the rear of plot A118, down the rear of plot A90 to access plot A91 and A92. Opening up possible unlawful incursions to the rear of plots A114-A116. An alley is also incorporated along the side of the rear of plots A120 and A121, to access plot A119, opening up the possibility of unlawful incursion from plot A112. (SBD Homes 2019, pages 21-22, paras 13.1-13.3 refers).



5. An alley is incorporated between the rear of plots A124 and A125, to access plots A123 and A124 respectively. Opening up the possibility of unlawful incursion to the rear of plots A112 and A140. A further alley is incorporated between the rear of plots A128 and A129, to access plot A127. The alley could also be accessed from by front of plot A140.



6. An alley is incorporated between the rear of plots A158 and A159, to gain access to plots A156 and A157. Opening up possible unlawful incursion to the rear of plots A149-A150 and A152-A153.



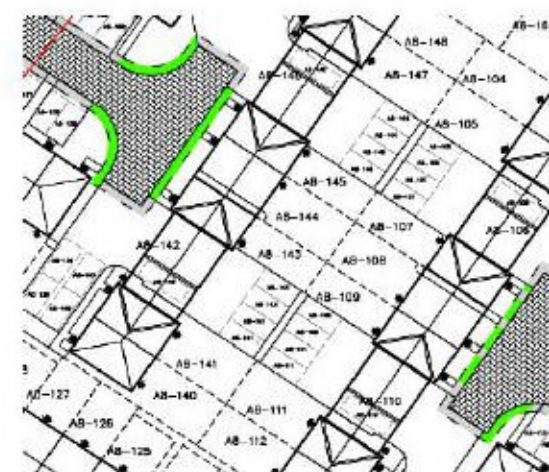
7. A number of parking spaces have been allocated <sup>1</sup> the front of plots A147-A149, these plots back onto the rear of plots A159-A160 and the alley way previously mentioned for plot A158. If cars are all parked here, it will shield an offender and possibly assist them to gain unlawful entrance into this alley and the rear of these properties, it is preferred if these spaces can be broken up and placed nearer to each of their respective properties.

Research regarding burglaries has shown that around 85% of unlawful entries occur via the rear of a property. If these alleys are essential to open up access to rear properties they must be gated. The gates must be placed at the entrance to the footpath, as near to the front of the building as possible. The gates should have good locking mechanisms that only residents have access for and all these gates should have retainers fitted to automatically close on entry/exit.

8. Four main flying freeholds have been allocated, which are a serious security concern:

- 1) at plot A106, to allow rear parking spaces for plot A107 and A108
- 2) at plot A110 to allow rear parking spaces for plots A109 and A111
- 3) at plot A142 to allow rear parking for plots A141 and A143
- 4) at plot A146 to allow rear parking spaces for plots A144 and A145

The police actively discourage the inclusion of flying freeholds (under crofts), as they tend to offer no active surveillance. The siting of rear parking is also discouraged by police as time and again these types of locations suffer from theft of and from motor vehicles, along with criminal damage, anti-social behaviour, drug taking, graffiti and arson, as they allow an offender to go about undetected due to a lack of any form of surveillance from any surrounding properties.

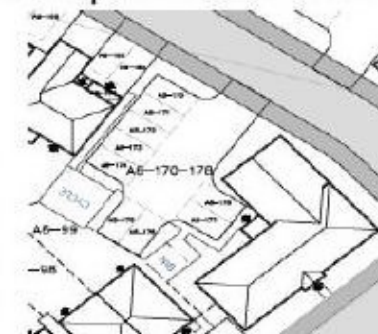


It would be preferred if these designs could be removed, or altered with no under crofts, or rear parking. If these plots have to remain within this format, it is strongly recommended security gates are fitted and photocell dusk to dawn lighting that meets BS5489:2013 lighting standards is placed on the side of buildings in order to deter casual intrusions.

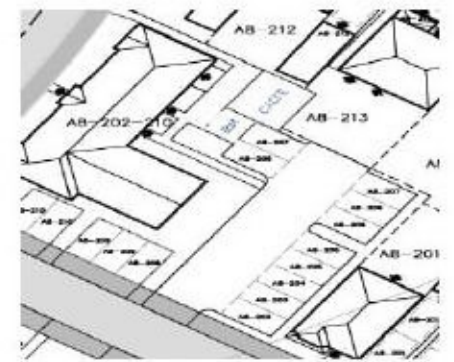
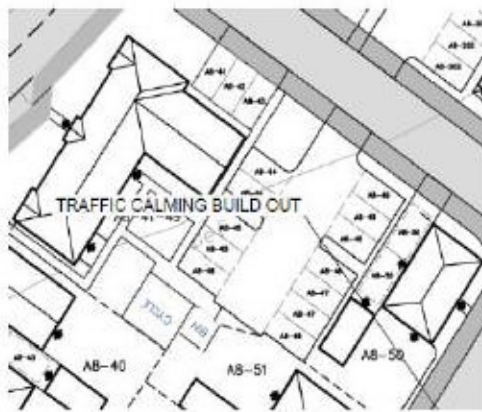
9. The two parking spaces allocated for plots A181-A182, back onto the rear of plots A229 and A230, making these rear plots vulnerable to rear incursion.



10. The parking spaces for plots A175-A176, back onto the rear of plot A99 and the cycle store for plots A170-A178 is in the corner out of the way, where there is a real lack of surveillance.



11. Similarly, the cycle store for plots A41-A49 and A179-A187, are all placed in the far corner and away from the main building, where there is a real lack of surveillance. This is a concern as it makes all these areas vulnerable to thefts. It could also become a location for groups of people to gather and commit antisocial behaviour. (SBD Homes 2019, pages 68-69, paras 56.1-56.4 refers).



12. Plot A243 has its garage and two parking spaces set back and away from its main plot, with no surveillance. If these parking areas cannot be changed and will remain in their current format, then there needs to be surveillance incorporated through active windows from nearby plots.

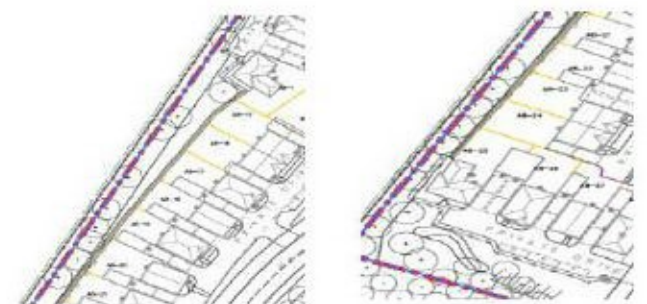


13. The parking area for plots A202-A210 is a concern too as there is very little surveillance available for the cars parked on the eastern side of this area bordering plot A201. This type of design also opens up the rear of plots A201 and A212-214 to possible unlawful rear incursion.

14. Communal parking should be in small groups, close and adjacent to the front, or side of homes and must be within view of active rooms that will provide natural surveillance. (SBD Homes 2019, pages 22-23, para 16.2-16.11 refers).

15. There are a number of gable end properties, such as plots A4; A5; A8; A29; A41-A49; A50; A61; A62; A179-A187; A211; A221; A222; A232; A233; A243; A249; A261, these areas can become congregation areas, which can then result in graffiti, anti-social behaviour and criminal damage. Where gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing, or a 1m mature height hedge with high thorn content. (SBD Homes 2019 refers, page 21, para 12.1- 12.2.2 refers).

16. The plans show that there will be an area of space between the rear of plots A1-A3 and A15-A25 on the western side of the development which will have vegetation all along it. Will this vegetation cover the whole of this area, so that no one can congregate anywhere within it, or be able to access the rear of any of these properties? it is strongly recommended to deter intruders this perimeter comprises of defensive vegetation, such as Berberis, Pyrocantha or Hawthorn (SBD Homes 2019 page 19, para 10.5-10.6.1 refers).



17. The area within the south eastern corner of plot A8 will have a number of trees either side of the roundabout entrance. Will this vegetation also cover the whole of this area, so that no one will be able to congregate within it, or be able to take part in any criminal activity?



18. It is stated that a communal play area will be within parcel A8. Any play equipment installed should meet BS EN 1176 standards and be disabled friendly. It is recommended that any such area has suitable floor matting tested to BS EN1177 standards. The area should be enclosed off with fencing. Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object. Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. (SBD Homes 2019, pages 17-18, paras 9.1-9.4 refers). All litter bins should be of a fire-retardant material.

19. It is stated that an allotment will be incorporated, allotments constantly suffer from criminal activity, usually due to antisocial behaviour. However, the consequences of such actions often leave allotment holders distressed that all their hard work has been for nothing, because plants have been forcefully uprooted and killed off, along with other

offences, such as damage to allotment sheds and theft of tools. It is strongly advised that good quality security fencing is placed all round such areas, at a height of at least 1.8m and entry/exit is limited to one area only and that this area is able to be secured to control access.

I realise space within this area will be tight, but it would be good to see an area set aside for a secure building such as an ISO shipping container, for allotment holders to secure away their tools and perhaps store compost and produce.

The following legislation applies to the application:

**Information:** National legislation that directly relates to this application are:

**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, anti-social 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 91(b).**

Planning policies and decisions should 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 clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.

**Paragraph 127(f).**

Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>46</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

If you wish to discuss anything further please contact us on 01284 774141.

Yours sincerely



Jackie Norton  
Design Out Crime Officer,  
Suffolk Constabulary

Yours sincerely



Phil Kemp  
Design Out Crime Officer  
Suffolk Constabulary

23/12/19

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