



SUFFOLK CONSTABULARY

Secured by Design



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PLANNING APPLICATION: DC/20/0615/RM: Reserved Matters Application - Submission of details under SE/09/1283 - the means of access, appearance, landscaping, layout and scale for the construction of 168no. dwellings with associated private amenity space, means of enclosure, car parking, vehicle and access arrangements together with proposed areas of landscaping and areas of open space for a phase of residential development known as Phase 2

LOCATION: Land North West of Haverhill - Anne Suckling Lane Little Wratting Suffolk

APPLICANT: Persimmon Homes (Suffolk) Ltd

PLANNING OFFICER: Ms Penny Mills

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines. Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

Dear Ms Mills

Thank you for allowing me to review the above reserved matters application and comment on them.

I note from the DAS that the development falls within the Little Wratting parish and was agricultural land. It forms part of the long-standing vision of Council set out in the 2015 outline planning permission for residential development of 1,150 new homes, primary school, local centre including retail and community uses, with public open spaces. I believe parking forms part of the RM on the application. The aim is also to encourage cycling, walking and use of public transport for the residents living there and therefore create site permeability. On page 12 point 4. Key Design Principles and Objectives, highlights that the design is to "where possible, houses front outwards towards the green space and other existing natural features providing additional natural surveillance." Suffolk Police and Secured by Design (SBD) principles recommend the use of natural surveillance on to public open spaces **but** also on to residential dwellings as this offers a good deterrent for criminal activity.

I note that there have been concerns about the rear parking courts and those are to be re-designed which would be recommended and in line with SBD and Crime Prevention Through Environmental Designs (CPTED) principles. There is reference on page 26 6.6 Key Frontages/Spaces and Focal Buildings mentions homes having private spaces and gardens located securely facing other back gardens. This is also recommended within SBD and CPTED guidance.

Brief Summary: However, Suffolk Police have **concerns** around the following areas: Permeability, rear parking, vehicle parking away from dwellings, long access paths to rear gardens, parking without surveillance to it, lack of natural surveillance onto dwellings, cycle storage away from dwellings and the purpose of the central square. All of these issues could contribute to an increase in crime, making residents feel unsafe and resulting in an increase on police demand.

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SITE SPECIFIC RECOMMENDATIONS:

1. **PARKING: Rear Parking bays/Garages/curtilage parking areas/Cycle Storage:** Garages and parking areas that are significantly set back to the rear or side of the dwellings (and not ideal) as this allows for little or no observation from neighbouring dwellings from ground floor “active living rooms”. Rear Parking does not allow for surveillance to vehicles and can encourage ASB, criminal damage, theft from motor vehicles as well as graffiti and is not recommend within SBDH 2019 guidance (see Section 16). SBD states that vehicles should be parked in locked garages or on hard standing within the dwelling boundary. Where communal parking areas are necessary bays should be sited in small groups, close and adjacent to homes and in view of active rooms. (Section 16.3 on rear parking is of specific note). Some of the dwellings have garages or parking spaces located away from them where there is little or no surveillance these should be re-configured.



Those parking bays that abut the open space area (or allotments plots 104-116, 114-116 etc) appear to have no protection or surveillance to them.

Cycle storage should conform to SBDH 2019 Section 56 and communal bike storage should be within 50 meters of the primary entrance to a block of flats and located in view of active rooms. See SBDH 2019 Section 56.3



Some of the plots of concern relating to the above are: Plots **96-103**, 104-111, 112-116, 124/125, 73-80, 81-88, 64, 63, 1, 27, 31, 30, 155-151, 91,92, 156, 157. This is not an extensive list.

2. **LONG REAR ACCESS PATHS:** There are several long access paths to rear gardens and some that pass dwellings through to rear parking areas. These are not recommended. SBDH 2019 Section 13.1 states “Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.” These types of paths allow access to other dwellings as well as those they are intended for and offer no surveillance to them. For example, Plot 56 garden path will allow access over any fencing to Plot 57, 53 and 52 and 49. Often bins are left outside of gardens and act as a climbing aide into gardens and offers the opportunity for burglary to dwellings or sheds.



3. **PERMEABILITY:** The proposal is to link together new and existing community facilities via footpath links (for pedestrians and cycle use). SBD and Suffolk Police recognise that 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. Where we cannot demand reductions in permeability without having evidence that this is the only option, we ask that the design of walkways, lighting, surveillance and the security of surrounding properties ensures that any permeability is as safe as it can be. It should ensure that the offender will stand out in a well-designed community. There are a considerable number of footpaths into the development.

It is therefore recommended that paths and cycle routes are kept to the minimum and where they are located they allow for some measure of slowing down a potential offender. Footpaths must be as straight as possible, preferably at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles with low growing and regularly maintained vegetation on either side or staggered railings could be incorporated in link paths to slow down any potential offenders. It would assist that these areas are well lit and consideration for CCTV where there is no natural surveillance, (SBD H2019 Sections 8.1-8.22 refers). It is important that landscaping does not cause areas for hiding in or obstructing the view of the path ahead. Footpaths should therefore be designed to ensure that they are visually open, direct, well used and should not undermine defensible space areas, so that residents will feel safe to use them and enhance their feeling of safety to continue to use them. Footpaths should not run to the rear of, and provide access to rear gardens, or dwellings as they are proven generators of crime. (SBDH 2019, Section 8.8-8.12 refers).

4. **PUBLIC OPEN SPACE/CENTRAL SQUARE:** Public open space area should be fenced/railed off, or comprise wooden posts, this will assist in reducing antisocial behaviour from either parked vehicles, or any off-road motor biking. See SBDH 2019 Section 9.2- 9.3.2. Bins should be anti-arson and tamper proof and refuse collected on a regular basis. The SUDs area should also be protected with some form of a boundary.
Central Square: This area could lend itself to become an area for ASB gathering, or ball games or scooters. It is recommended that there is some form of speed restriction. Landscaping with trees in this area should not impede on surveillance from the dwellings into the area. I believe this area already has caused some concern.
5. **DWELLINGS:** Some of the dwellings have very little surveillance onto them from neighbouring dwellings. Examples are Plots 168 to 146, 145-124, 121-123, 50-55 etc etc. Front boundaries will need clear demarcation with defensible space between open space areas and their private boundary.
General dwelling security should consist of doors and windows to PAS 24:2012 or 2016 standards, and dusk to dawn lighting, lockable gates and fencing to be 1.8 m high close board or 1.5 m with 300 mm trellis topping. (See SBDH 2019 Sections 10, 21, 22, and 25). Cycle storage should conform to Section 56 of SBDH 2019). Those with integral garages should confirm to Section 21.9-21.11 of SBDH 2019.
6. **GABLE END WALLS:** Most of the dwellings have large gable end walls with little surveillance from "active" rooms (most of the gable windows were in bathrooms or stairways). This does not provide surveillance into curtilage parking areas or onto open space areas and also can provide the opportunity for ASB (ball games) to those abutting open space areas or carparking. See SBDH 2019 Section 12 for full guidance. It is recommended that where in curtilage parking is the dwelling has a window that actively looks on to the driveway.
7. **HOUSE TYPE 1059 DT CHARACTER AREA 4:** This type of dwelling appears to have a carport design parking for two vehicles. This is not recommended it allows for areas of concealment and the opportunity for vehicle crime and does not allow residents to secure property parked or stored within. If these are carports then it is recommended that they are re-designed to garages in order to reduce any opportunity for crime.
8. **HOUSE TYPE CORBY/PIEL FLATS:** These dwellings will need access control and consideration for compartmentalisation to ensure that only residents can access their areas and that non-residents cannot access the building at all. This reduces the risk of burglary, cold calling and mis-use of drugs activity.
There should be external mail facilities so that there is no need for postal access to individual flats and use of smart meters for easy meter readings. See SBDH 2019 Section 24 in relation to lightweight framed walls, Section 25 for lighting in communal areas within flats and apartments, Section 27 provides full guidance on access control specifications, Section 32 provides guidance on mail delivery options. These matters can be discussed by the DOCO with the developer to provide full guidance and requirements.

9. **FENCING:** I note that there are various types of fencing, railings etc throughout the development. I could not find a layout of where each type would be used. I would like to see more details on where each type of fencing is going to be used, to ensure that they are appropriate in security levels for the area and do not allow for easy climbing or act as climbing aides into other areas.

It is strongly recommended that the applicant applies for ADQ and Secure by Design accreditation for Homes 2016. **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% and achieve ADQ.**

SECURE BY DESIGN (SBD)

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime. 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. Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCOC) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a fortress environment'.

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 users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

Please do not hesitate to contact me if you require clarification with regards to any of these points or would like help with the SBD application.

Yours sincerely


Jackie Norton
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Suffolk Constabulary