Suffolk Constabulary
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Planning reference:	**DC/26/0280 Reserved Matters**
Proposal:	**Erection of two-storey, 66 bed care home for older people, with associated car park**
Address:	**Land by English Way, part of Great Wilsey Park, Haverhill.**
Applicant:	**Mrs Jo Kemp, LNT Care Developments Limited and Helen Josephine Pelly**
Case Officer:	**Mr Adam YANCY**

Dear Mr **YANCY**

Thank you for the opportunity to comment on the above consultation.

1.0 ANALYSIS OF PLANNING APPLICATION

1.1 It is noted that this site forms part of the initial planning application for a large residential development, named Great Wilsey Park, ref: DC/15/2151/Out in which a generic response was given by my former colleague, Ms Heather HIGHTON on the 22nd of December 2015.

1.2 The site covers an area of approximately 6807sqm (1.68 acres) and takes up the northern most part of parcel A4, which is specified for C2 care on the approved parameters plan. The internal floor area covering 3,400sqm over two floors. It is also acknowledged that Care Homes play an important role within any local area, but can be vulnerable to crime and in order to cater for residents' wellbeing security needs to be good to prevent any unauthorised casual intrusion.

1.3 It is encouraging to see the developers quoting the guidelines of the NPPF, at paragraph four of their Planning Development document and in particular with regard to this development 'Promoting Health and Safe Communities' (Para 4.12). Along with West Suffolk Local Planning policies, under Policy SP3 for 'Health and Wellbeing at Para 4.28. The police acknowledge **Health and Wellbeing plays a prominent part in the makeup of any development, person(s) needs to want to live in such locations and predominantly feel safe within them.** ***(Also see NPPF information laid out at Para 4.2 of this report).***

1.4 It is encouraging to see within the Design Access Statement (DAS), at Para 7.4, that the police recommended Secure By Design standards have been mentioned, with regard to lighting, vehicle parking and securing the boundary area.

2.0 GENERAL OPINION OF SUFFOLK POLICE OF PLANNING APPLICATION

2.1 Having viewed the available plans with regards to Section 17 of the Crime and Disorder Act, Suffolk Police have no objections to this proposed development.

2.2 It is a shame the developers have not requested to seek Secure By Design (SBD) Non-Residential (Commercial) certification, to either Gold or Silver standard. Secured by Design (SBD) is a UK police initiative that improves the security of buildings and their surroundings to reduce crime. It offers a Police Preferred Specification for products like windows, doors, and locks, along with site layout, which are tested to withstand burglary. SBD accreditation indicates a, often 75% lower, risk of crime in developments.

2.3 Experience shows that incorporating security measures during a new build or refurbishment reduces crime and the 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 occupiers and visitors without creating a "fortress environment."

2.4 The building phase of any construction, especially one such as this is always at even more risk within the construction phase, with temporary portable buildings, extra containers for storage, vehicles and

equipment on site, so it is strongly recommended that extra security is instigated to protect these assets. The police through their Secure By Design site offer crime reduction advice for construction site security which can be accessed using the following link: CONSTRUCTION_SITE_SECURITY_GUIDE_A4_8pp.pdf (securedbydesign.com)

2.5 The comments made regarding this development have been taken from the 2025 'SBD Non-Residential (Commercial) 2025 guide', see NON RESIDENTIAL GUIDE 2025 3425.pdf Along with an SBD Sheltered Accommodation guide 2004 at SBD-sheltered-accomodation.pdf and https://www.bsia.co.uk/zappfiles/bsia-front/pdfs/293_ac_for_healthcare_final.pdf and 177-ac-guide-care-homes-01.pdf

2.6 PERIMETER: As stated in order to cater for residents well being and community safety, there is an urgent need to secure the perimeter, so it is good to see that the perimeter will comprise of 1.8m close boarded fencing. Having the resident's garden along the internal perimeter is good to see too. ***(See SBD Non-Residential 2025, Paras 73.1-73.3 and Paras 75.1-75.2).*** **It is also good to note that the current defensive hedge row at the front of the complex will be retained.** ***(See SBD Non-Residential 2025, Paras 76.1-76.9 and Para 78.1).***

2.7 INTERNAL ROUTE LAYOUT: The methods of traversing the site have been noted and **it is good to see that the design incorporates clear lines of sight.** ***(See SBD Non-Residential 2025, Paras 1.4.-1.9 and Paras 84.1-84.2).***

2.8 VEHICLE PARKNG: I have concerns as to whether enough vehicle parking has been factored in, however, I note that the developers have a number of similar sites around the country and have made an analysis based on usage from these historic sites that the levels of parking within this development meet the needs of similar established properties. **It is good to see that the vehicle parking is clearly set out, with good lighting and surveillance both from the main reception area and café.** ***(See SBD Non-Residential 2025, Paras 80.1-80.4).***

2.9 CYCLE PARKING: I have concerns regarding the sighting of the cycle store in front of the Waste and to the east of the main building, which appears to be out of the way of any form of surveillance. I would have preferred such a structure to have been nearer and within sight to the main building. *(See SBD Non-Residential 2025, Paras 85.1-85.7).*

2.10 EV CHARGING: It is noted that six EV charging spaces have been incorporated. ***(See SBD Non-Residential 2025, Paras 83.1- 83.2 and Paras 84.1-84.2).***

2.11 STRUCTURE DETAILS: ***(See SBD Non-Residential 2025, Paras 37.1-37.2, Paras 38.1-38.6, Paras 39.1-39.4, Paras 40.1-40.4, Paras 41.1-41.4, Paras 42.1-42.5, Paras 43.1-43.4 and Paras 98.1-98.4 and Paras 99.1-99.6).***

2.12 GLAZING: All ground floor and easily accessible glazing need to incorporate laminated glass or glass tested to BS EN 356:2000. It is also strongly recommended that limiters are put on all ground floor windows to prevent casual intrusion and on the secondary floor, for health and safety reasons. ***(See SBD Non-Residential 2025, Paras27.1-27.2 and Paras 28.1-28.17***

2.13 INTERNAL LAYOUT: ***(See SBD Non-Residential 2025, Paras 45.1-45.5, Paras 46.1-46.5, Paras 47.1-47.8, Paras 48.1-48.6, Paras 49.1-490.2, and Paras 51.1-51.4).***

2.14 STAFFING AND RECEPTION AREA: It is good to see that 24/7 staffing will be employed within the complex. It is also good to see that there is a double entrance, with an external and internal double doorset, to provide a sterile area to vet visitors**, prior to allowing access and to prevent tailgating.** Having the café area close to the entrance removes the need for visitor movement around the site and provides valuable surveillance for the frontal area. ***(See SBD Non-Residential 2025, Paras 46.1-46.5 and Paras 47.1-47.8 along with SBD Sheltered Accommodation 2004, Para 3).***

2.15 STAFFROOMS AND MAIN ADMINISTRATION OFFICE/RECPTION: Staff should have their own staff only room areas, with their own individual secured lockers, to place valuables into. Similarly, the administration office needs to be access controlled and secure cabinets pertaining to residents and their medical details. ***(See SBD Non-Residential 2025, Paras 47.1- 47.8).***

2.16 CLINIC AREAS AND MEDICATION: It is noted that around the central area of each floor a clinic has been allocated. It is presumed all medication will be left within these two areas. Any medication needs to be stored within a medically approved security cabinet. The doors for these two locations need to be access controlled with a good five lever lock or other good quality locking mechanism. There are

effectively two different types of drugs and medicine cabinet construction, one is used for the storage of Medicines and one for the storage of Controlled drugs. Each type must conform to a certain standard or combination of standards that determines whether it is a controlled drug or medicine cabinet. British standard 2881:1989 applies to the safe storage of drugs in healthcare premises. See Health Building Note 14-02: Medicines storage in clinical areas and BS2881:1989 Information | British Standard for storing medicines

2.17 LIGHTING: The lighting plan has been noted and it is good to see that the perimeter area will be well covered along with the parking area. ***(See SBD Non-Residential 2025Paras 34.1-34.3 and Paras 99.1-99.6, along with SBD Sheltered Accommodation 2004, Paras 1.1-1.2).***

2.18 BRICK BUILT SUBSTATION: It is noted that the proposed sub-station will have louvered doors, whilst it is acknowledged that ventilation is important for buildings like this, such structure types tend to allow offenders easy access by removing the louvres, I have noted from the specifications that they will be made of mild steel and fully welded into an angled frame and secured internally by suitable anchor fittings into the brickwork. From what has been proposed the design appears to be of a nature that would make it hard for an offender to easily damage these louvres to gain access.

2.19 CCTV: The most important aspect of utilising CCTV is that it records and notifies a user in real-time as an intrusion is occurring and not after the event. The quality of the system and its imagery are also highly important. The use of CCTV at any location should be based on a series of comprehensive operational user and requirement tables. CCTV must be monitored 24/7, supported by management plans and procedures, alongside data sharing protocols clearly detailing the expectation of all parties. There is one simple philosophy to be adopted and applied to any CCTV system – 'What is it intended to do? In a situation as varied as this, there will be differing needs depending on location. To accommodate the overall need it is essential that User Operational Requirement (UOR) be written. ***(For further information on CCTV see SBD Non-Residential 2025, Paras 35.1-35.13).***

2.20 Careful consideration must be applied to the positioning and installation of the CCTV cameras, along with the associated infrastructure to ensure that they cannot be easily tampered with or disconnected from the system to allow blind spots in coverage and opportunities to compromise the cameras. Not only will the planning of the CCTV system be important in these regards, but a thorough testing of the system should be undertaken to confirm its suitability and effectiveness under different conditions. In the event of a critical incident, CCTV will be imperative and therefore Suffolk Police welcome early discussions concerning the use, operational requirements, and accessibility of CCTV, which will need to be embedded within contingency plans, overall policies and procedures and include the nature the immediate response to suspicious activity. The recommended standards for the surveillance camera industry can be found at: www.gov.uk/guidance/recommended-standards-for-the-cctv-industry The details of the travel plan for the area have been noted and for more information on police advice for such activity ***(see, SBD Non-Residential 2025, Paras 64.1-64.3, Para 65.1, Paras 66.1-66.4, Paras 67.1-67.4, Paras 68.1-68.2, Paras 69.1-69.4 and Paras 71.1-71.4).***

2.21 INTRUDER ALARMS: ***(See SBD Non-Residential 2025, Paras 54.1-54.3).***

3.0 FURTHER GENERAL ANALYSIS OF THE PROPOSED DEVELOPMENT

3.1 As a Design Out Crime Officer (DOCO) my role within the planning process is to give advice on behalf of Suffolk Constabulary in relation to the environmental design and the physical security of the layout and structures within this application, based upon the established principles of 'Crime Prevention through Environmental Design' (CPTED). **Looking at techniques and principles to assist with the orientation and navigation of the site, creating identifiable spaces to discourage and minimise the risk of crime and Anti-Social Behaviour through natural and informal surveillance,** which is advice that has been implemented worldwide since the early 1970's, looking at seven main principles, (see Crime prevention through environmental design | College of Policing **). Further information on CPTED can be found at Crime prevention through environmental design - Wikipedia** or Crime Prevention Through Environmental Design – Design For Security From this method of environmental design the police initiated Secure By Design, see Secured by Design - Secured by Design

3.2 Building to the physical security of Secured by Design, which is the police approved security standard, will reduce the potential for burglary by 50% to 75% and achieve ADQ. It is a shame that the developers have not opted to go for secure by design certification. In such cases the police request that developers at least adopt CPTED guidance.

3.3 Constructing well designed places and buildings that promote sustainable communities and improved health and wellbeing for any age or gender is an objective that Suffolk Police widely support; however, it is imperative that they must also be safe, secure, and accessible. This can be evidenced within a Health Impact Assessment, in that mitigating the opportunities for crime reduces and prevents both physical and mental harm, it is also about building strong, cohesive, vibrant, and participatory businesses and communities. The Building for Healthy Life document looks at 12 considerations that should be looked at for New Developments under https://www.designforhomes.org/wp-content/uploads/2020/11/BFL-2020-Brochure.pdf (also see Paras 7.3 - 7.13 "NPPF and NPPG," at Secure By Design (SBD) Residential Homes 2025).

3.4 It is not a Design Out Crime Officer's role to make individual comments on highways and traffic situations, however, part of my remit is to look at the parking layout and express any concerns that may lead to crime or incidents of antisocial behaviour.

3.5 This report aims to identify both actual and potential vulnerabilities, **to futureproof against the more likely future crime trends. Proposals are suggested to provide long term cost benefits to both Landlord, owner and tenant alike from a physical protection element**. The main scope of this report covers the perimeter, surveillance, parking and open spaced areas.

3.6 It is important that features are installed that promote a feeling of safety. This engenders a sense of 'ownership' and that feeling will manifest itself in users and visitors alike, challenging anything perceived to be out of the ordinary and this seems to be the case with this application.

3.7 A major factor influencing the security of a development is the nature of the surrounding land use and its location, whether in a city centre, urban, suburban, semi-rural or rural setting. All planned routes should have a rational purpose, follow natural desire lines, be subject to natural surveillance and have a functional requirement. In this way, criminal opportunities will not be created through unrestricted movement along quiet alleyways, informal shortcuts or through unnecessary access points. Routes for pedestrians, cyclists and vehicles should run alongside one another rather than be segregated. Movement frameworks based upon 'primary routes and shared spaces remove the need for little used alleyways, shortcuts, footpaths and large numbers of minor access points that may become ambush points and are often environmental factors in promoting the fear of crime. Where a through route must be incorporated into a development, care must be taken to avoid excessive permeability around a site to deny criminals excuses to trespass.

4.0 REFERRALS

4.1 The changes to the English Planning and Building Control regulations following in-depth reviews by the government have underlined the importance of the police advice delivered over the past 35 years; specifically in the form of the Secured by Design (SBD) initiative. The references within the National Planning Policy Framework (NPPF) and the accompanying National Planning Practice Guidance (NPPG)

4.2 NPPF Policies that are applicable to this application are Paragraphs 96(b), 102(a) and 135(f):

Paragraph 96(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 well designed, clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.

Paragraph 102 (a) Planning policies and decisions should promote public safety and take into account wider security and defence requirements. Layout and design of developments should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.

Paragraph 135(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; and where crime and disorder and the fear of crime, does not undermine the quality of life or community cohesion and resilience.

4.3 Section 17 of the Crime and Dis-Order Act outlines the responsibilities placed on local Authorities to prevent crime and dis-order.

4.4 The Suffolk Design Guide for Residential Areas- Shape of Development – (Design Principles Security) Looking at the careful design of a new development in regard to landscaping, planting and footpaths.

4.5 Department for Transport – Manual for Streets (Crime Prevention) The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians.

4.6 Security Overlay to the RIBA Plan of Work, dated at Security Overlay to the RIBA Plan of Work at Security Overlay to RIBA Plan of Work

4.7 The Safer Places section of the Planning System and Crime Prevention 2004 Home Office guide states that there are seven attributes for sustainable communities, which range from Access and Movement to Management and Maintenance of a site. See Safer Places

5.0 Crime STATISTICS FOR POST CODE AREA CB9 7UD

5.1 For the period the 1st of January 2025, to the 31st of December Suffolk Police recorded 7 crimes on their Police Crime computer base for this location, which broke down as follows:

a) In January 2025, a petrol jet wash and Air conditioning unit was stolen from within the local building site.

b) In January 2025, it was reported that a mother was ill treating her daughter, not letting her out of the house and mentally abusing her.

c) In February 2025, offenders entered the building site and removed various building materials.

d) In September 2025, person(s) unknown accessed the main building site and removed a number of boilers.

e) In September 2025, two males were observed to be involved in a drug deal within the area.

f) In October 2025, an attempt was made to steal an onsite workman's tool van.

g) In November 2025, a property was burgled with the offender accessing a rear window.

5.2 Crime figures can be obtained publicly via the Police UK site, through their Crime Mapper web site, at Home | Police.uk or Suffolk Observatory at Crime figures can be obtained publicly via the Police UK site, through their Crime Mapper web site, at Home | Police.uk or Suffolk Observatory at Overview - Ward | Hadleigh South | Report Builder for ArcGIS under the Withersfield ward.

5.3 Though crime is low within the immediate area Suffolk Police strongly recommend that the development adheres to the recommendations outlined to reassure community safety and reduce the risk of increasing the opportunity for crime and disorder.

5.4 Crime is reasonably low for this area, as the land for this development mainly comprises of open fields, however, there are residences and businesses that have just been built and that are around the periphery. Once all these new residential properties are completed, this will be a thriving area and more of a target for crime and the need for community safety.

6.0 FINAL CONCLUSION

6.1 As Initially stated, Suffolk Police have no objections to this application.

6.2 The site needs to have good perimeter security and a securely controlled main entrance area.

6.3 Good quality real-time CCTV that will immediately notify key holders of any intrusion as it is occurring, is also strongly recommended.

6.4 Secured by Design (SBD) is an initiative based upon principles of ***"designing out crime"*** incorporating the latest security standards to address emerging criminal methods of attack. SBD has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments.

6.5 I would be pleased to work with the developer and planners to ensure that the proposed development incorporates the required elements.

Phil KEMP

Design Out Crime Officer (DOCO) for South and West Suffolk
County Partnership and Prevention Hub Suffolk Constabulary

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