



Planning Application (DC/21/00641/Res Mat).

Site: Erection of 51 dwellings on Land East of Turkeyhall Lane, Bacton, IP14 4NN

Applicant/Agent: Mr LAMBERT, Bidwells for Flagship Homes, 31 King St. Norwich

Planning Officer: Mr Alex SCOTT

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Dear **Mr SCOTT**

Thank you for allowing me to provide an input for the above Planning Application.

On behalf of Suffolk Constabulary I have viewed the available plans and would like to register the following comments with regards to Section 17 of the Crime and Disorder Act.

Further to the comments submitted on 13 Aug 2021, it is noted that a number of changes have been made to this development which will assist in reducing the concerns previously stated and the architects and designers are to be commended on these amendments.

Whilst there are a few concerns remaining, the change in design is highly recommended and as a result the police do not have any objections to these proposals.

- a) Plot 1 still has its parking space set too far back, as do plots 9-10. However, there is no longer a concern regarding plot 24.**
- b) The undercroft (flying freehold) incorporated over the entrance to plots 46-51 was a real concern. It is good to see that this design has now been altered, with no flying freehold and no rear parking.**
- c) The pathway that ran by the front of plots 46-51 is no longer a concern, as the plans have been changed to allow surveillance from the front of plots 50-51.**
- d) The pathway that will run north west to south east from the pond by plots 1 and 8, either side of plots 36-39 and what were plots 32-35 leading into St Marys playground was a concern as the design ran along the rear of all these plots with no surveillance. The design remains the same for plots 1 and 8, however what were plots 36-39 are now the rear of plots 40, 43 and 44. More importantly what were the rear of plots 32-35, have been repositioned 180 degrees so that they are now facing this open area, with surveillance offered for the pathway from at least plots 34-35 and vital surveillance for this open area, which is to be commended.**
- e) The Open Space opposite the pond and by the rear of plots 1 and 8 is still a concern as this area could become a location for groups to congregate and cause antisocial behaviour, however, the change in design along this middle area and the area for the path running north west to south east is an appreciated improvement.**
- f) Regrettably in changing the design there are now two alleys incorporated for the rear of plot 42 to access the rear of plot 41, making these plots and the rear of plot 43 more susceptible to unlawful incursion. As well as a second alley by plot 47 to access the rear of plot 48, making the rear of these properties and the rear of plot 46 more vulnerable to unlawful incursion too. The police do not recommend alleys, as they attract antisocial behaviour and other activities such as drug dealing and heighten the risk of arson. However, this design is much preferred to the previous design and overall this lessens the risk of crime, compared to the previous option.**
- g) There were concerns regarding the pathway between plots 24-25 as it was believed this design would open up the rear of these properties to be more susceptible to unlawful incursion. However, this has been eased by the redesigning of this area, which again is good to see. This south eastern**

area is still a concern from the point of view it could become a congregating area for people to gather and cause antisocial behaviour, but this updated design is preferred.

- h) Concerns were raised that the previous lighting plan did not indicate where column lamps would be placed, this is still the case, although the lighting plan attached is helpful in identifying the location of external PIR lighting on dwellings. There needs to be a column lamp placed in the middle of the south western parking court for plots 43-44 and 45-46, as they only have frontal plot parking with no garaging. There needs to be good lighting with an even spread of illumination to provide surveillance. The light will need a back plate in order to remove light pollution onto the Open Spaced area by St Mary's Playground.
- i) It was previously stated that there were concerns at the lack of active windows to provide surveillance for vehicle owners by what were plots 36-39 and plots 46-51. It is good to see that this is no longer the case and the incorporation into the design highlighting the properties that will have active windows looking onto vehicle bays is appreciated, making the viewing of these plans so much easier to identify.
- j) Similarly it would be good to see a lighting column at the southern most section of the site at the end of the existing footpath that will connect the new development with the already established properties.

It was stated in the previous comments that it was good to see well laid out back-to-back properties. So it is even better to see that this updated design incorporates even more of this sort of design, especially with the change to what were plots 36-39 and are now plots 40-49.

The role of a Design Out Crime Officer (DOCO) within Suffolk Police is to ensure that new developments are designed to minimise the opportunity for crime to occur which in the main is through the analysis method of Crime Prevention Through Environmental Design (CPTED) which is an analysis that is adopted for every proposed planning application no matter what the scheme. Further information on CPTED can be found at [Crime prevention through environmental design - Wikipedia](#) or [Crime Prevention Through Environmental Design – Design For Security](#) Which is backed up by further security principles through the national Police Secure By Design (SBD) methodology. Further information on Secure By Design can be found at [Secured By Design](#)

Constructing well designed places and buildings that promote sustainable communities, improved health and wellbeing 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.

Suffolk Police also provide an interpretation of the basic Principles of Secured by Design outlined in their "Residential Design Guide" at [Design Guide New Format \(suffolk.police.uk\)](#)

1.0 GENERAL COMMENTS ON PROPOSED RESIDENTIAL AREA PLAN IN BRIEF

- 1.1 The boundary perimeter areas of all Open Spaced Areas need to be fenced off with post and rail fencing, to prevent antisocial vehicle behaviour.
- 1.2 Care needs to be given to the sighting of any public seating, which could be a magnet for attracting crowds and antisocial issues. (SBD Homes 2019 (V2), page 16, paras 8.18-8.18.7 and page 17-18 paras 9.1-9.5 refer).
- 1.3 Where vegetation is incorporated either side of any footpath, it is recommended that it is low growing and regularly maintained, to prevent hiding places for any would be offender.
- 1.4 It is good to see the design has incorporated 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.
- 1.5 In particular the detailed design should take account of the following principles:
- **Access and movement:** *Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security.*

- **Structure:** Places should be structured so that different uses do not cause conflict with no recesses, or obstacles for an offender to hide.
- **Surveillance:** In places where all publicly accessible spaces are overlooked CCTV should be co-ordinated within the lighting and landscape design. Lighting design should be co-ordinated with a CCTV installation and the landscape design to avoid any conflicts and to ensure that the lighting is sufficient to support a CCTV system.
- **Lighting:** Lighting should be designed to conform to BS 5489-1:2013 and light fittings should be protected where vulnerable to vandalism. The colour rendering qualities of all lamps should be to SBD standard of a minimum of at least 60Ra on the colour rendering index.
- **Ownership:** Places that promote a sense of ownership, respect, territorial responsibility and community.
- **Physical protection:** Places that include necessary, well-designed security features.
- **Activity:** Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.
- **Management and maintenance:** Places that are designed with management and maintenance in mind, to discourage crime in the present and the future, encouraging businesses and legitimate business users to feel a sense of ownership and responsibility for their surroundings can make an important contribution to community safety and crime prevention. Clarity in defining the use of space can help to achieve a feeling of wellbeing and limit opportunities for crime.

2.0 SECURE BY DESIGN (SBD)

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of a Design Out Crime Officer 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'.

It would be good to see the development, or at least the Social Housing element built to Secured by Design SBD Homes 2019 accreditation. Further information on SBD can be found at www.securedbydesign.com

A further downloadable document can be obtained using the following link: https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_NEW_version_2.pdf

3.0 REFERRALS

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

3.1 The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in chapter 8, para 91b and chapter 12, para 127f, in that developments should 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, do not undermine the quality of life or community cohesion and resilience.

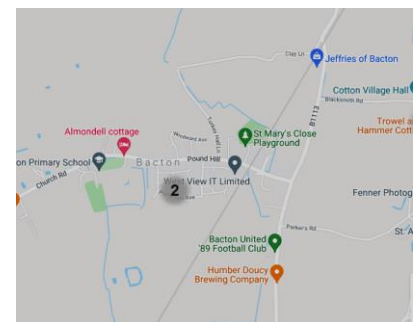
3.2 The Suffolk Design Guide for Residential Areas- Shape of Development – (Design Principles Security) Looking at the careful design of a new development in regard to landscaping, planting and footpaths.

3.3 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.

4.0 CRIME STATISTICS FOR POST CODE AREA IP14 4NN CODE AREA

The crime figures have been obtained from the Suffolk Police Crime computer base and the National Police Crime Mapper web site. The Police Crime Mapper Web site is available for any member of the public to view using the following link: Stowmarket | Police.uk and

<https://www.suffolkobservatory.info/overview/?geographyId=355e134d218e43fda37e52fb98024d6f&featureId=E05012589>



4.1 The graph right indicates a breakdown of the offences committed around this area between June-November 2021, totalling 29 offences, up by 10 offences from the last report for January-June 2021, which totalled 19 offences, the majority again relating to Violent and Sexual offences, which totalled 16 offences compared to 9 offences previously. Followed this time by Burglary/Theft, which totalled 7 offences, the second highest offences previously stated were those involving Public Order/ Antisocial Behaviour which totalled 6 offences, however this time around they went down to 3 reported.

Offence	June 2021	Jul 2021	Aug 2021	Sept 2021	Oct 2021	Nov 2021
Burglary/Theft	1	2		1	2	1
Robbery						
Vehicle Crime						
Criminal Damage/Arson					1	1
ASB/Public Order/Harrassmt		1	1	1		
Violent & Sexual Offences	2	4	1	3	6	
Shoplifting			1			
Drugs						
Other Offences						
Grand Totals	3	7	3	5	9	2

4.2 There have been previous problems around the local wooded area in 2016 and 2019, where people have set up tents and been living within them, which has caused some friction.

5.0 FINAL CONCLUSION

It is good to state that the main concerns regarding this development have been looked at and the designs changed.

The only real concerns that remain around this development are the two Open Spaced areas that could promote the gathering of individuals to cause antisocial behaviour opposite the pond and by the rear of plots 1 and 8, along with the south eastern area to the side of plots 24-25.

The change in design now incorporates two new alleys for the rear of plot 42 to access the rear of plot 41 and by plot 47 to access the rear of plot 48. The police do not recommend alleys as they make the rear of properties more vulnerable to incursion. The communal gates for these alleys need to be securable, with only residents allowed access.

Finally it would be good to see a lighting column at the southernmost section of the site at the end of the existing footpath that will connect the new development with the already established properties.

I would be pleased to work with the agent and/or the developer to ensure the proposed development incorporates preferred crime reduction 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 anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely



Phil Kemp

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