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Date: 27th July 2020
Ref: SE-178/19/05000/HYB/AF2

Dear Claire Shearing,

Thank you for your letter dated 6th July 2020 in relation to:

Application Ref: SE/19/05000/HYB
Location: DSTL Fort Halstead Crow Drive Halstead
Proposal: Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,773 sqm GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 635 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); land safeguarded for a primary school; change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space and; associated landscaping, works and infrastructure. In detail: demolition of existing buildings; change of use and works including extension and associated alterations to buildings Q13 and Q14 including landscaping and public realm, and primary and secondary accesses to the site.

Amended Consultation

The changes to the application include: a reduction in the number of homes proposed from 750 to 635; associated changes to density; amendments to the design of both the outline and detailed parts of the application including highway amendments; change to site boundaries to remove development on the helipad (north eastern side of the site), and; uplift in employment floorspace. For a full summary of the changes please refer to the Covering Letter by CBRE dated 9th June.

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF) and noted the changes detailed in the applicants Covering Letter dated 9th June 2020.

As detailed in my previous letter dated 14th November 2019, if this application is to be approved, we strongly request a CPTED Condition be included to address the points below and show a clear audit trail for Design for Crime Prevention and Community Safety to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.

Having reviewed the application on-line, we were unable to find the Design and Access Statement Part 1. However, the previous application references Paragraph 127 of the NPPF.

My previous comments remain valid and are repeated or amended in italics below. The applicant may wish to note that lighting should now conform to BS5489-1:2020, which supersedes BS5489-1:2019.

We appreciate the plans may be indicative at this time. We note the reference to Paragraph 127 of the NPPF within the Design and Access Statement (DAS) dated September 2019 (page 10), however section (f) has been omitted in regard to crime prevention.

We also note section 9.7 Designing Out Crime on page 181 of the revised DAS (online date published 11/06/20).

The following issues need to be addressed including:

1. The use of the SBD Homes 2019; SBD Commercial 2015 and SBD New Schools 2014 initiatives are recommended for these proposals should the planning application be granted.
2. Development layout and permeability. Design and creation of new and upgrading of existing and proposed foot and cycle paths.
3. CPTED for the residential areas, school/educational, commercial and business campus elements.
4. Design of the garden street, The Square and other communal areas.
5. Perimeter, boundary and divisional treatments including gates. Front, side and rear boundary treatments should follow SBD Homes 2019.
6. Corner Properties and defensible spaces.
7. Recesses. We note the inclusion of recesses as part of the building design of the proposed Blocks (e.g. Block B). These recesses give us some cause for concern as they may provide hiding areas and opportunities to commit crime.
8. Parking inc. visitor. Rear parking courts should be avoided. If there is to be any undercroft parking, it should be gated and access controlled to remove the opportunities for crime.
9. CCTV.
10. *Access Control. Full audio visual door entry access control systems will be required for any block of flats of 4 residential units or more.*
11. Doorsets and windows. We note Crittall style windows are referenced within the DAS for the Village Centre dated October 2019, along with the listed nature of some of the buildings. Doorsets and windows should be certified to PAS24:2016 as per SBD Homes 2019, particularly if an SBD accreditation or security points for BREEAM are required.
12. Security Compartmentation will be required for all blocks of flats of 25 residential units or more.
13. Alarms.
14. Landscaping.
15. Play areas. We note that LEAPs and LAPs will not be fenced. Whilst we appreciate the reasoning (page 102 of the DAS), we recommend low level fencing or hedging and gates with auto closers, to deter/prevent dogs from accessing any formal play areas.
16. Youth shelters, MUGAs and skate parks etc. Location and design is very important to prevent/deter anti-social behaviour and crime.
17. *Lighting. Lighting should be specified to BS5489-1:2020 as per SBD Homes 2019. SBD state: "18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided."*
18. Cycle and bin storage.

We welcome a discussion with the applicant/agent about site specific designing out crime.

If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Yours sincerely



Adrian Fromm
Designing Out Crime Officer
Public Protection and Partnerships Command
PVP Central Co-ordination Department