



**Kent
Police**

Protecting and serving the people of Kent

Planning Service
Tonbridge & Malling Borough Council
Gibson Buildings
Kings Hill
West Malling
Kent
ME19 4LZ

Direct Line: 01622 653209
E-mail: pandcr@kent.pnn.police.uk
Date: 09 September 2021
Ref: 21/01911/FL/CAEH/TM-145

Dear Planning Officer,

Thank you for the opportunity to comment regarding:

Application Ref: 21/01911/FL
Location: Land Rear Of 182 High Street Tonbridge Kent
Proposal: Redevelopment to form 34 Retirement Living apartments for older persons including communal facilities, and associated car parking and landscaping, and the repositioning of 4 existing car parking spaces

We have reviewed this application regarding Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

NPPF Paragraph 91(b) and Paragraph 127(f) state: 91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: (b) 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) of the National Planning Policy Framework (NPPF), states: Planning policies and decisions should ensure that developments: (f) 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.

Secured by Design (SBD): www.securedbydesign.com is the UK Police flagship initiative combining three differing levels of security: The highest level (Gold) incorporates the security of the external environment together with the physical security specification of the home. Silver offers those involved in new developments, major refurbishment and the individual the opportunity to gain an award for the level of physical security provided. Bronze offers a route to achieve a reasonable level of physical security for bespoke or refurbished properties where a traditional enhanced security product is not available, or for listed buildings and other conservation status.

Applicants/agents should incorporate CPTED and SBD. We strongly recommend that the applicant bases the design on SBD Homes 2019 or 2021 (due shortly) and attains an SBD award by meeting principles of SBD. Independently certificated products that meet recognised security standards have been responsible for consistently high reductions in crime as verified by numerous independent academic research studies of 87% reduction in burglaries in new homes nationwide. As DOCO's, we use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behavior (ASB), Nuisance and Conflict.

The points below are site specific and designed to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.

1. We recommend the use of the Secured By Design (SBD) initiative for this proposal.
2. Regarding permeability and access control, the main public entrance opposite the proposed parking area must be close to the reception to restrict unnecessary further access into the building. We strongly recommend the office/reception area to be facing the car park, and to be located immediately next to the lobby for better natural surveillance. The proposed ground floor plan shows a room located next to the lobby and with stairs access (Stair 1) to the first floor. This layout causes concern as unauthorised access can be obtained to upper floors if door is left unlocked. In addition, the staff won't be able to detect intruders obtaining unlawful access to the premises.

Audio/visual communications between the main front lobby door and the reception/management area should be installed in order to create a secure access-controlled lobby area, this should also allow any out of hours staff to view anyone requesting access. Access control with visual or audio verification linked to each individual unit as mentioned in the Planning Statement is encouraged. A suitably designed, fit for purpose, intruder alarm system must be installed to monitor all other entrances and fire exits.

3. Toilet facilities should be located close to the reception area to restrict further access into the building and therefore, its current location near the lift is not ideal.
4. Perimeter, boundary, and divisional treatments should be well established. It is important to distinguish private spaces from public and communal routes to reduce the opportunity for trespassers to gain unlawful access to private spaces and parking areas. It is essential that the boundary treatments create a secure line to protect the sides and rear of the building and also importantly to protect the residents in the interests of safety and site security. The proposed rear and side boundary division of the development should be a minimum height of 1.8m to ensure security and privacy for ground floor flats from Annison Street, the overlooking private car park, and alongside public rights of way. Any hedges used as boundary must be dense and mesh fencing incorporated to prevent gaps/ desire lines being used to access rear gardens.
5. Recessed doors should be no deeper than 600mm especially if hidden from public view, e.g. side or rear, unless on an active street frontage with maximum natural surveillance and public view but even then, no deeper than 1m. Deeper recesses can allow a potential burglar a secluded area to work in and for communal doorways allow someone to hide and wait to tailgate someone else in or take advantage of a door closing to squeeze through. While lighting and ground treatments can help deter them, it is rare for anyone to confront them. Finally, it can provide an unofficial smoking area that can lead to nuisance and conflict and shelter for loitering that can increase the fear of crime. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for apartments.
6. A CCTV system should be installed to cover all elevations, entrances and exits and the car parking areas, in the interests of site safety and security.
7. SBD recommends, where possible, mail delivery via a secure external letter box or delivery 'through the wall' into a secure area of the building. We strongly recommend TS009 specifications. A tradesperson button or timed-release mechanisms are not permitted as they have been proven to be the cause of antisocial behaviour and unlawful access to

In addition, new shrubs should be maintained at a height of no more than 1m unless planted to create a densely planted defensive perimeter treatment. Great care must be taken to ensure that the natural surveillance of all car parking areas is not affected, and therefore, shrubs/trees must be properly maintained.

15. We require information on the planned management for the site. If there will not be 24/7 management, we require security compartmentalisation to prevent unauthorised access from the reception and lobby areas to the flats.

If this application progresses, 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, the neighbourhood and local policing. Current levels of reported crime have been considered.

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

Yours sincerely,

DOCO.

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