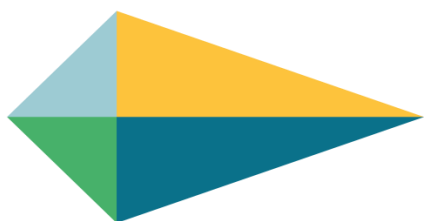


Late Responses to Westerfield Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 21 August to 9 October 2024

November 2024



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Late Responses

Suffolk Constabulary3

This document contains representations received after the closing date of 5pm on Wednesday 9 October 2024.

A separate document entitled Responses to Westerfield Neighbourhood Plan contains all representations received during the consultation period 21 August to 9 October 2024.

Suffolk Constabulary

Suffolk Constabulary is pleased to have the opportunity of commenting on the consultation draft of Westerfield Neighbourhood Plan, to Westerfield Parish Council.

Designing Out Crime Officers (DOCOs)

Designing Out Crime Officers (DOCOs) provide security and crime prevention advice, in relation to the built environment at every stage of the design process through the full development control process, to minimise potential crime, disorder and anti-social behaviour in any proposed development.

They seek to work with planners and developers to provide advice on residential, school, hospital and commercial planning applications.

Suffolk Constabulary is supported by four DOCOs. Their duties encompass the former Architecture Liaison, Crime Prevention and Problem-Solving Officer roles.

Crime Prevention attempts to reduce and deter crime and criminals, enforce the law, and maintain criminal justice.

The following regulations and guidance are designed to ensure that Crime Prevention is maximised at the planning stage and thereafter.

National Planning Policy Framework (NPPF)

Crime and Disorder NPPF Policies that are applicable to developments are Para 91b and 127f.

Paragraph 91b.

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.

Paragraph 127(f).

Planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible, whilst promoting health and well-being, with a high standard of amenity for existing and future users, and where crime, disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 17 of the 'Crime and Disorder Act 1998' (CDA)

This part of the CDA 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'.

SECURED BY DESIGN (SBD)

An early input at the design stage is often the best way 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 creates a sense of ownership and responsibility for every part of the development. These features include secure vehicle parking, adequate lighting of common areas, access control, defensible space and a landscaping and lighting scheme which 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.

Secured by Design principles are detailed in respective 'User Guides' for Housing, Commercial and School developments. I attach copies of each for your information.

In Suffolk, there is no mandate to implement SBD accreditation. However, it can be voluntarily adopted or imposed by the area planning office, as a condition of relevant permissions.

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% - 75% and ensure compliance with Approved Document Q (ADQ - which applies to dwelling developments and is also attached for information).

Observations in respect of Westerfield Neighbourhood Plan

It is noted that in the proposed Neighbourhood Plan or any proposed new developments with that plan, there is only a small reference to security but none to crime prevention. Neither Crime Prevention Through Environmental Design (CPTED) or Secured by Design (SBD) principles are acknowledged as being essential aspects of good design and are an effective way for Local Authorities to address crime.

Safe and secure developments help to provide an environment which promotes community spirit and reduces the demand on partnership agencies and the police, on issues such as Anti-Social Behaviour, Domestic Violence, Misuse of Drugs and Burglary.

The above has been proven to reduce crime, increase the likelihood of detecting criminal activity and improve public perceptions of safety.

It may be that inclusion of such methodology falls outside the remit of a Neighbourhood Plan. However, Suffolk Constabulary endorse an early input into designing out crime at the concept and design stage, as the best way to promote a partnership approach to reducing crime and fear of crime. [SBD Homes 2024](#) and [SBD Commercial 2023](#) give a full understanding of those principles and it is recommended they are reviewed before any planning proposals are submitted. The [interactive guides](#) also offer some insight into designing out crime. Additional information on SBD can be found at www.securedbydesign.com

Suffolk Constabulary noted that within Policy WFD 7 Artificial Lighting under 7.4 it references 'security' and states, "Wherever practicable, development proposals should respond positively to the dark sky environment of the parish and avoid the use of streetlights. Any future outdoor lighting systems should have a minimum impact on the environment by being downward focussed and motion sensitive, not extend past the property boundary, and minimise light pollution and adverse effects on wildlife and subject to:

- i. highway safety
- ii. the needs of particular individuals and groups, or
- iii. Security**

It is pleasing to see that within the response of Community Action 4 – Reducing Light Pollution (pg. 33) the parish council will aim to ensure the darker skies are maintained, 'whilst balancing with sufficient lighting to keep the streets safe.'

Under 9 Highways and Travel (pg. 42) the Community Action 7 – 'Walking and Cycling Safety and Public Rights of Way refers to 'the Parish Council and other relevant authorities and landowners will work together to provide **safe** walking and cycling routes in and around Westerfield'. This can be achieved by wide pathways, good lighting, and good levels of natural or formal surveillance into the area and ensuring that pathways do not run to the rear of dwellings or commercial buildings.

Suffolk Constabulary recommend that the Westerfield Neighbourhood Plan considers including a recommendation that all planning applications be built to CPTED (Crime Prevention Through Environmental Design) principles and Secured by Design standards.

Ideally, a planning condition for every application should be included, to that effect.

The following (among others) should be considered when any new development is submitted for consideration:

- **Local Ownership:** The quality of the urban environment has a major influence on crime, fear of crime and levels of anti-social behaviour. Good designs can enhance public perceptions of safety and promote a greater sense of 'local ownership' and community identity, by encouraging residents to feel pride in their neighbourhood.
- **Natural Surveillance:** Crime and anti-social behaviour can be deterred by ensuring that all parts of any development are subject of natural surveillance. There are many ways in which this can be achieved whilst maintaining privacy. Promoting active use of streets and public spaces is an effective means of restricting opportunities for crime.
- **Defensible space:** Public and private areas should be clearly defined to make people aware of where they are allowed to go. Crime and anti-social behaviour are more likely to occur if users are unclear whether space is public or private or unaware of the behaviour expected in each.
- **Access and Movement:** Good designs and layout play a key role in tackling crime and social exclusion by creating better connected and more accessible environments without compromising security. Developments with too many under-used connections and large networks of indirect, poorly lit, and segregated pedestrian routes, providing access to the rear of buildings, can create opportunities for crime and easy escape routes for criminals. On the other hand, layouts with too few connections to local amenities and public routes can restrict freedom of movement and create dead ends. A good 'movement framework' provides convenient, overlooked, and well-used principal routes that lead directly to where people want to go. This removes the need for underused alleyways, footpaths, shortcuts, and minor access points which are vulnerable to crime.
- **Parking:** Whether within the curtilage of a property or communal, parking can have a significant effect on the opportunity for crime. The main forms of criminal activity in car parks are theft of/from vehicles, and assault. Parking as part of new development should seek to create safe and convenient facilities where everyone can feel secure. A range of design measures can be used to create a safe and attractive environment with good natural surveillance.

- **Permeability:** The balance between permeability and accessibility is always a delicate one. From a policing perspective, excessive accessibility provides entry and escape routes for those committing crime. Suffolk Constabulary encourage designers to combine walkways/thoroughfares with lighting, surveillance, and security, to ensure that permeability is achieved, whilst enabling ready identification of those there for nefarious purpose.
- **Footpaths:** Public footpaths and cycleways should be overlooked by neighbouring properties, be straight and wide to maintain good visibility along their route, with recesses or gaps between buildings being closed off by a walls or railings. It is important to ensure that footpaths have a purpose and do not create 'rat runs' and/or areas which cannot be monitored.
- **Private and Communal Areas:** Providing adequate and well-maintained public spaces can make an important contribution to community safety and community well-being, by raising levels of activity in public areas and providing valuable local facilities for all age groups. Poorly planned spaces with limited surveillance can increase the risk of vandalism and assault. Such areas can also be used to gain access to properties. Public spaces should be fronted by dwellings and not backed onto by private rear boundaries or back gardens.
- **Street Lighting:** All street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks must comply with BS5489-1:2020. Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements should be discussed with the DOCO and the local authority lighting designers. A variable controlled lighting level is always the preferred option in addition to one which does not disadvantage disabled and older people who may have a sensory impairment and require well-lit routes to enable easy wayfinding and to make other users more easily visible. Attention to position and location of lighting to improve illuminance at ground level can avoid user casting shadows onto the surface whilst minimising light pollution.

[Suffolk Constabulary](#) provide comprehensive crime prevention advice on home security, personal safety, road safety, watch schemes, business safety, boat safety, online safety, counter terrorism, child safety and personal security.

Please feel free to contact either of us if you wish to discuss the recommendations above further. We look forward to continuing to work with Westerfield Parish Council in the future.