



**Kent
Police**

Protecting and serving the people of Kent

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Date: 30th December 2021
Ref: G-227/20211415/EH3

Thank you for the opportunity to comment in regard to:

Location: Garages Rear Of Osney Way Car Park Lower Higham Road Gravesend Kent
Proposal: Demolition of 14 existing lock-up garages and the erection of 4no. three-storey terraced homes, with associated parking, gardens, access, refuse and bike storage, and boundary treatments.

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

Our comments contained within our previous letter dated 17.02.2021 for this site, previously under application number 20201379, remain valid. Whilst, these plans have addressed points from our previous letter, we require further information to be provided regarding physical security and lighting plans to address CPTED or incorporate SBD into this design.

1. Perimeter, boundary and divisional treatments must be 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.
2. Parking - We advise against the use of undercroft parking as this can create an opportunity for crime. Where unavoidable, the areas must be covered by sufficient lighting. The proposed pedestrian and vehicle access gates, as shown on the illustrative plan, are a measure we support to reduce the opportunity for crime on the site.
3. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Homes 2019 states:
"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."
Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
4. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors to meet PAS 24: 2016 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
5. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2016 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.

6. For cycle security we advise on the use of ground/ wall SBD or sold secure anchors within the cycle storage area/sheds of dwellings.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

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 DOCCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Yours sincerely

DOCCO.

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