



Delegated Report

Approval of Details Application

Planning Application No: 20240434

Location: Land At St Columbas Close Gravesend Kent

Description: Application for approval of condition 12 attached to planning permission reference number 20221179 relating to details of crime prevention measures according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED)

Applicant: Mr Sam Duckett, Oakwood Building Contractors Ltd

Submitted Documents/Plans

- Planning Application Form; and
- Kent Police Designing Out Crime Letter dated 14th May 2024.

Relevant Planning History

Reference	Description	Decision	Decision Date
20240456	Application for approval of condition 11 attached to planning permission reference number 20221179 relating to details (and samples where requested by the Local Planning Authority) of all the external facing materials to be used in the construction of the development.	Under Consideration	
20240372	Application for approval of condition 8 attached to planning permission reference number 20221179 relating to a arboricultural method statement being submitted and approved.	Under Consideration	
20240458	Application for approval of condition 3 attached to planning permission reference number 20221179 relating to a comprehensive Code of Construction Practice covering all environmental impacts of this development.	Approval of Details	01.07.2024
20240319	Application for approval of conditions 7, 9 and 27 attached to planning permission reference number 20221179 relating to details of (7) Scheme of sustainable water drainage, (9) Foul and surface water sewage disposal and (27) Infiltration of surface water drainage.	Approval of Details	26.06.2024
20240373	Application for approval of condition 10 attached to planning permission reference number 20221179 relating to details of how the development will offset biodiversity loss/enhance biodiversity.	Approval of Details	19.06.2024
20240323	Application for approval of condition 6 attached to planning permission reference number 20221179 relating to the details of the lighting design and biodiversity.	Approval of Details	11.06.2024

20240261	Application for approval of the first part of condition 5 attached to planning permission reference number 20221179 relating to the implementation of an archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable.	Approval of Details	23.05.2024
20240260	Application for approval of condition 4 parts a, b and c attached to planning permission reference number 20221179 relating to a strategy to deal with the potential risks associated with any contamination of the site.	Approval of Details	23.05.2024
20221179	Demolition of Nos. 1-12 St Patricks Gardens. Nos. 36-41 St Patricks Gardens and Nos. 28-42 even nos. only St Columbas Close, and the caretakers facility. Erection of 2no. 2 storey buildings, 1no. 3 storeys building and 1no. part 3 and part 4 storey building; to provide 46 residential dwellings (Class C3) residential use, with associated vehicle and pedestrian access, amenity space with hard and soft landscaping, car and cycle parking, refuse and recycling storage provision, and other associated works.	Permitted	06.04.2023

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- T1 – Impact of Development on the Highway Network
- P3 – Vehicle Parking Standards

Paragraph 33 of the NPPF (2023) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving well-designed and beautiful places

Supplementary Planning Guidance

- SPG 4 - KCC Parking Standards (2006).

Consultations

Kent Police – Designing Out Crime

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

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. 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 Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces surrounding the site, any parking areas/ courts and pedestrian routes. These areas must be well lit and covered by natural surveillance from neighbouring properties.
2. Perimeter, boundary and divisional treatments must be a minimum of 1.8m in height. Any alleyways to have secure side gates, which are lockable from both sides, located flush to the front building line.
3. To meet SBD guidance we would strongly recommend the installation of pavements on both sides of the roads to avoid vehicle and pedestrian conflict and promote safer spaces for families. It is now common practice to have some shared vehicle/ pedestrian areas on secondary routes. If pavements cannot be installed in these shared spaces, we strongly recommend traffic calming measures, especially where there is a curvature in the road.
4. Parking - To help address vehicle crime, security should be provided for Motorbikes, Mopeds, Electric bikes and similar. SBD or solid secure ground or wall anchors can help provide this. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse. Undercroft areas can attract crime and therefore, should be finished in a light colour and be well lit. If car ports are unavoidable, we recommend they [https://kpep.sharepoint.com/teams/K-DesigningOutCrimeTeam/Shared Documents/General/1 CPDA Planning Applications/Gravesend/\(G-317\) St Columba's Close Gravesend DA12 4AJ/DOCO Response.docx](https://kpep.sharepoint.com/teams/K-DesigningOutCrimeTeam/Shared Documents/General/1 CPDA Planning Applications/Gravesend/(G-317) St Columba's Close Gravesend DA12 4AJ/DOCO Response.docx) be lit and painted in a light colour to optimize surveillance opportunities. For car parks, we recommend the Safer Parking Scheme, which follows CPTED guidance from both the police and the British Parking Association.
5. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
6. 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.
7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors and individual flat entrance doors to meet PAS 24: 2022

UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please note PAS 24 is a minimum-security standard, and communal doors may require a higher standard, such as STS or LPS.

8. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 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.
9. We advise on the use of ground/ wall SBD or sold secure anchors within a cycle storage area/ sheds of dwellings to deter bicycle theft.
10. Mail delivery to meet SBD TS008 with a fire guard are strongly recommended for dwellings. For buildings with multiple occupants we recommend TS009 standards. Please note we advise against trade buttons, if mail is to be delivered inside a lobby there must be an airlock/ access-controlled door to prevent access further into the building for anyone other than residents.
11. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.
12. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.
13. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.
14. CCTV is advised for all communal entry points and to cover the mail delivery area.
15. Defensible spaces. Corner properties require well established boundaries to avoid desire lines across front gardens. This can be provided by using hedges or knee rails/ fences, for example.
16. Blank Walls. It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces. This type of elevation tends to attract graffiti, inappropriate loitering, and ball games. The provision of a 1m buffer zone using either a 1.2 – 1.4m railing or a 1m mature height hedge with high thorn content should address those issues.
17. Vehicle mitigation may be required on pedestrian routes, to prevent mopeds or similar vehicles accessing the area and causing nuisance.
18. Open space. Open space areas must be well lit and boundaries must be clearly defined to avoid conflict or ball games causing nuisance. For any LAP or LEAP, we recommend fencing at a minimum height of 1.2m and vandal resistant play equipment. Consideration should be given to a single dedicated entry and exit point to enable adult control/supervision.

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

Officer's Analysis

Condition 12

Crime Prevention Measures

12. Notwithstanding the details shown on the approved plans, submitted documents and application form, before any above ground works commence, details of crime prevention measures according to the principles and physical security requirements of Crime Prevention through Environmental

Design (CPTED) shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented prior to any of the residential units hereby permitted first being occupied and shall thereafter retained.

Reason: To ensure the development protects the environment of the site and its locality generally, in the interest of security, crime prevention and community safety and is in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

The following information has been submitted to discharge condition 12:

- Planning Application Form; and
- Kent Police Designing Out Crime Letter dated 14th May 2024.

The wording of Condition 12 states that details of crime prevention measures shall be submitted to the local authority for approval. No actual details, including plans and particulars of layout, design of any lighting, boundaries, pavements and parking, together with window or door details, pedestrian routes or open spaces boundaries have been submitted. A schedule of implementation has also not been submitted in support of this condition application. The letter from Kent Police Designing Out Crime Letter dated 14th May 2024 only lays out what is recommended and is not sufficient to satisfy Condition 12.

Comments from Kent Police Designing Out Crime has stated that they welcome a discussion with the applicant/agent about site specific designing out crime. It is therefore recommended that a full scheme of crime prevention measures is discussed with Kent Police DOCOs prior to the submission of further details for discharge of Condition 12.

The application is therefore contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (September 2024) and Section 12 of the National Planning Policy Framework (NPPF) 2023. It is therefore considered that Condition 12 is not discharged.

Conclusion & Recommendation

The applicant has not provided sufficient information or detail to satisfy the requirements of Condition 12 of planning application 20221179 and is therefore recommended for refusal.

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	9th July 2024	Dated:	9 th July 2024