



**Kent  
Police**

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Planning Service  
Physical & Cultural Regeneration,  
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ME4 4TR

[REDACTED]  
[REDACTED]  
Date: 14<sup>th</sup> September 2020  
Ref: MW-398/MC/20/1756/AF4

Dear Madeline Mead,

Thank you for your letter dated 25<sup>th</sup> August 2020 in regard to:

Application: MC/20/1756  
Location: Garages Adjacent To 176 Grange Road, Gillingham, Medway, ME7 2QT  
Proposal: Outline application with some matters reserved (landscaping) for construction of a block comprising of 24 residential apartments with associated parking - demolition of private garages removal of existing electrical sub-station.

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

We note this is a revised scheme with an increase in 4 residential apartments, to the previous planning application MC/20/1038 (20 residential apartments). We also note the three planning applications for this site under the following planning reference numbers:

MC/20/1737 (19 residential apartments)  
MC/20/1756 (24 residential apartments)  
MC/20/1757 (22 residential apartments)

Applicants/agents should consult us as local Designing out Crime Officers to address CPTED. 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.

Secured by Design (SBD): [www.securedbydesign.com](http://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.

To meet SBD physical security requirements, SBD require doorsets and windows to be certified by an approved independent third-party certification body e.g. (UKAS) in the name of the final manufacturer/fabricator. This requirement exceeds the requirements of Building Reg ADQ. Products that are independently certificated to recognised security standards have been responsible for consistently high reductions in crime as verified by numerous independent academic research studies. Details of how to ensure products are certified are on the SBD website.

If this application is to be approved, we strongly request an Informative 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 the following issues need to be addressed including:

1. We recommend the use of the Secured By Design (SBD) initiative for this proposal.
2. Development layout and permeability.
3. Perimeter, boundary and divisional treatments including gates. The rear parking area should be fenced to a minimum of 1.8m on all boundaries. This is particularly important on the Southern boundary, as there appears to be a footpath or alley running along this boundary. Trellis topping is also recommended as an added layer of security. Any arris or other fencing support rails should face into the parking area to deter/prevent climbing. An access controlled pedestrian gate is recommended to protect the entrance passage way along the boundary of house number 164. This alley is an area of concern as it provides a hidden recess. An additional fence or gate is recommended to secure the side of the building and house number 176.
4. Corner Properties and defensible spaces. Defensible planting or railings should be installed to protect all ground floor bedroom windows and living room patio doorsets.
5. Parking inc. visitor. Vehicle and pedestrian gates are recommended to protect the parking areas. There appear to be 19 parking spaces in total.
6. Lighting. Any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP) 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."
7. Access Control. Full audio visual access control systems are required.
8. Postal delivery will need to be considered. A through the wall system, if space allows, negates the need for anyone delivering post to enter the building. Exterior wall mounted post boxes can be considered and if installed, should be certified to TS009 security specifications. If post is to be delivered into a lobby area, it is very important to install a second access controlled doorset as an 'air lock' to protect the stair core. It should not be possible for anyone delivering mail to access other parts of the building.
9. Doorsets need to be certified to PAS24:2016. This includes all communal entrances/exits, individual front doorsets for each apartment, any living room patio doorset or any vulnerable doorset, such as a balcony.
10. Cycle and bin stores should be in lockable enclosures and lit appropriately as per SBD Homes 2019 guidance.
11. Windows need to be certified to PAS24:2016 for all ground floor or easily accessible windows.
12. Landscaping. It is unclear if residents will have access to the second floor roof terrace.
13. 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.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AF' with a stylized flourish extending to the right.

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