

Case Officer: Howard Smith
Planning Officer
Exeter City Council

Kris Calderhead
Police Designing Out Crime Officer
Exeter Police Station,
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EX2 7RY

Date: 01/04/22

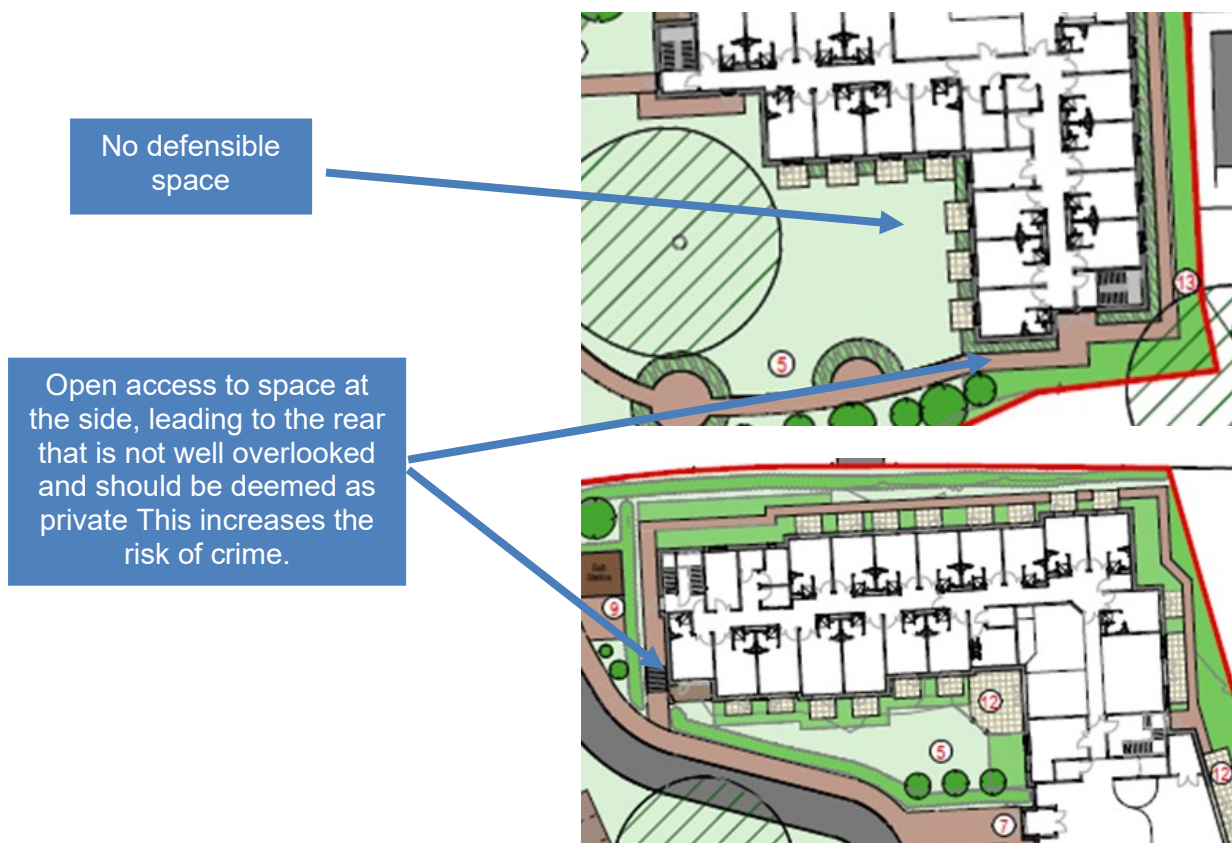
Dear Mr Smith,

22/0313/FUL Honeylands Hospital For Children, Pinhoe Road, Exeter, Devon, EX4 8AD. Redevelopment of the Honeylands building including demolition of existing extensions and the erection of replacement part single, part single/part two storey side and rear extensions to create a 64 bedroom older persons care home (use class c2) together with associated car parking, landscaping, drainage and other associated works including the creation of a replacement vehicular access onto Pinhoe Road.

Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this application.

Given that the area has suffered from anti-social behaviour and the nature of the site housing vulnerable members of society, it is vital that designing out crime principles are considered and implemented in the design of the scheme

I do have a concern with the design. There appears to be unrestricted access to the sides and rear of the development which if the case, I cannot support. Such areas should remain private spaces where access is restricted to residents and staff. If left open, it leaves the site vulnerable to crime such as theft, damage, burglary, trespassing etc. and also jeopardises the safety of residents. Appropriate boundaries / gating should be in place to prevent unauthorised access to such areas.



- Additionally, ground floor private areas should be afforded defensible space. Casual intrusion to private patios and windows of bedrooms should be prevented. Enabling potential intruders to access such space unimpeded, increases the risk of crime.

Further Recommendations

Access and Movement

- I note that '*progressive privacy principles are applied*' which is supported. Access beyond the reception area must be controlled. An access control strategy should be in place in order to prevent casual intrusion and safeguard residents from potential intruders. Guidance set out in the *Older People's Housing Design Guidance - The Royal Borough of Kensington and Chelsea 2015* should be considered. It refers to '*progressive privacy*' as a term to describe the policy of zoning such a scheme in accordance to the degree of access permitted by those other than residents:
 - The private zone is the dwelling itself, to which only the resident and invited guests have access.*
 - The semi-private zone comprises those circulation areas and communal spaces (assisted bathroom, residents-only lounge, etc.) that only residents and their invited guests may use.*
 - The semi-public zone comprises any circulation areas and communal spaces (restaurant, activity space, IT suite, and hairdresser, for example) to which the public have access at certain times.*
 - In some circumstances a fourth category - a public zone - may exist; for example if the scheme incorporates a drop-in centre which the general public could access without restriction.*

Access to zone (iii) will typically be controlled by a door-entry system, allowing staff or residents to permit access. Give careful consideration to the method of door-entry between zones (iii) and (ii). Residents should not be required to come down in person to allow access to their guests.¹

These principles should be implemented in the scheme with access to parts of the building beyond the reception being restricted and controlled by reception staff e.g. doorset with an electronic access control system, with an electronic lock release.

- Physical features should be utilised at the front of the development to prevent conflict between pedestrian and vehicle routes.
- Clear way finding, rule setting measures and signage should be in place to direct visitors and aid residents.

Surveillance

- It is recommended that CCTV is distributed throughout the development to aid in the prevention and detection of crime and anti-social behaviour. A clear Passport for Compliance document, including an Operational Requirement, should be drawn up to ensure the system is fit for purpose. Access controlled areas, entry/exit points, car park area, communal space that is poorly overlooked, cycle/bin stores etc. are of particular importance. The following advice is given in respect of any CCTV installed:

¹ Older People's Housing Design Guidance - The Royal Borough of Kensington and Chelsea 2015

- Accredited NSI or SSAIB installers must be used.
 - Cameras, wiring and recording or monitoring equipment should be secured. CCTV should be designed in co-ordination with external lighting and landscaping.
 - The CCTV must have a recording format that is acceptable to the Police. Recorded images must be of evidential quality if intended for prosecution.
 - Any CCTV is advised to be installed to BS EN 50132-7: CCTV surveillance systems for use in security applications.
 - CCTV systems may have to be registered with the Information Commissioners Office (IOC) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available via www.ico.gov.uk
 - For guidance on the use of CCTV images as legal evidence see also BS 7958:2005 CCTV Management and Operation Code of Practice.
- Lighting - Research shows that older residents have a greater fear of crime and an effective lighting scheme affects 6 out of the 7 Crime Prevention Through Environmental Design principles². For crime prevention measures, lighting should be provided by on building solutions or pole mounted luminaires if possible, with good levels of uniformity. Bollard lighting should be used for demarcation of routes only or supplementary as part of a general design.

Physical Protection

- External doors and easily accessible windows are advised to be tested and certified to a nationally recognised security standard.
- The bin and cycle stores should be robust enough to protect against theft and unlawful entry. A secure door should be fitted with a locking mechanism that protects people from being accidentally locked in. They should be lit at night using vandal resistant, light fittings and energy efficient LED lights, and be covered by CCTV.
- Ensure that the design of the building does not inadvertently provide climbing aids to balconies. For example, façades with '*projecting feature brick detail*' should not enable easy access balconies. Defensible planting could be considered to negate this risk.

Management and Maintenance

- At developments such as these that house some of the most vulnerable members of society, on-site security should be one of the priorities. Effective management with a clear security strategy and policies/procedures in place are essential. Appropriate staff should have clear responsibilities in relation to security, monitoring CCTV, managing access control, responding to incidents, carrying out regular security checks etc.
- The site also needs to be well maintained as a pleasant facility that appears welcoming and safe. The landscaping should be well maintained so as not to encroach or obscure CCTV cameras and/or lighting and to ensure a 'surveillance gap' is maintained.

² Safer Places – The Planning System and Crime Prevention

- Regular checks of CCTV equipment should be carried out to ensure that the system continues to meet the Operation Requirement section of the Passport to Compliance Document once it has been developed.

Yours sincerely,

Kris Calderhead
Police Designing Out Crime Officer