



**Kent  
Police**

**Protecting and serving the people of Kent**

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Date: 28 March 2019  
Ref: Y/Y19/0071/FH/LM1

Dear Mr Adam Tomaszewski

We have comments concerning the application below:

Location: Smiths Medical UK Boundary Road Hythe Kent CT21 6JL  
Proposal: Hybrid planning application for the redevelopment of the former Smiths Medical site comprising an outline application for up to 97 dwellings (Class C3) and up to 153sqm of offices (Class B1) with all matters reserved for future consideration except access, together with a detailed application for the erection of a 66-bed care home (Class C2) with associated access, parking and landscaping.

We have considered this application in regard to Crime Prevention Through Environmental Design (CPTED), in accordance with the National Planning Policy Framework (NPPF). Design and Access Statements should demonstrate that the design helps create an accessible and safe environment while minimising crime and disorder and fear of crime as detailed in the NPPF.

If this application is to be approved, we request that a Condition be included to show a clear audit trail for Design for Crime Prevention and Community Safety and meet both our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. We can provide the appropriate text on request.

The Kent Design For Crime Prevention was developed by council planners and Kent Police to help design out crime, it also aids Crime Prevention and Community Safety. A copy and details of CPTED are at: [www.kent.police.uk/advice/businesses/planners-and-developers/](http://www.kent.police.uk/advice/businesses/planners-and-developers/). Secured by Design (SBD) is the official UK Police flagship initiative combining the principles of 'designing out crime' with physical security, details of Homes 2019 are at [www.securedbydesign.com](http://www.securedbydesign.com)

We advise applicants/agents to consult us or suitably qualified security specialist to design out the opportunity for crime, fear of crime, Anti-Social Behavior (ASB), nuisance and conflict.

Having reviewed the on line plans and documentation, the applicant/agent has not demonstrated that they have considered designing out crime. We have had no communication from the applicant/agent and whilst there are many positives about the design, there are still issues that must be addressed, for example:

1. The plans show a highly permeable development with an "open" care home – making security and policing difficult. Bollards will not provide vehicle mitigation.
2. A min 1.8m perimeter treatment is required to protect existing neighbouring areas. Divisional fencing of 1.8m high inc. lockable gates to the front build line to secure the rear.
3. Care Home – the design needs plenty of surveillance opportunity defensive treatments to help provide security and privacy. Some external doors lack surveillance. All external doors should be alarmed, including the emergency exits. Nursing/care staff are not security.
4. Offices – security and parking a concern.

5. Surveillance – End of terrace housing requires side elevation “active” (e.g. kitchen or lounge) windows to allow natural surveillance opportunities.
6. Access Control – e.g. Type E1, there should be through the wall mail delivery or an air lock lobby and no trade button or timed release mechanism as they can be misused and enable antisocial behaviour and unlawful access to communal developments.
7. There must be an additional dual certification door to ensure that anyone gaining access to the hall cannot freely reach the first and second floor accommodation.
8. Parking for care homes if inadequate, leads to parking on verges, obstruction, blocking and conflict. The lack of a delivery bay or ambulance bay and this is a significant concern. Point 5.30 on page 14 of the Planning and DAS is a concern and not evidenced.
9. The parking court shows an area lacking natural surveillance and this is a concern.
10. Landscaping – There are areas where ownership is not clearly defined that could be abused or parked on. A meandering footpath through trees is a concern. Tree and shrub placement should not hamper natural surveillance so species and maintenance are crucial.
11. Doorsets, Windows and Access Control are crucial, we strongly recommend that SBD certification accreditation standard is used.
12. The bin and cycle stores must be access controlled and well lit.

We welcome a meeting or discussion with the applicant/agent about site specific designing out crime as if these issues are not addressed, it may affect the development and have a knock on effect for the future services and duties of local policing.

A development that achieves SBD accreditation, demonstrates that security has been addressed. To meet SBD requirements, doorsets and windows must be tested and certified by a recognised 3<sup>rd</sup> party certification authority. Approved Document Q building regulations for doorset and window specifications only require testing to PAS 24 2016.

The information contained within this response is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and improving Community Safety with regards to this specific development/planning application.

Yours sincerely



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