



**NOTTINGHAMSHIRE POLICE
DESIGNING OUT CRIME OFFICER
PLANNING CONSULTATION RESPONSE**

Application number	V/2022/0629
Proposal	Outline planning application (with all matters reserved except access) for a residential development of up to 300 dwellings with associated infrastructure and landscaping.
Address	Land at Newark Road, Coxmoor Road, Sutton in Ashfield
Date	05/02/2024
Consultee	Nick Butler MSc, Designing Out Crime Officer Neighbourhood Policing Hub Mansfield Police Station, Great Central Road, Mansfield NG18 2HQ Tel: 101 ext. 3117700

Dear Sir or Madam,

Thank you for providing the opportunity to comment on this application.

It is the responsibility of the Designing Out Crime Officer to provide specialist advice and guidance regarding the built environment at every stage of architectural design, from pre-planning to the full development control process (to minimise crime, fear of crime, disorder, and anti-social behaviour).

This does not, however, preclude subsequent recommendations from other specialist departments within Nottinghamshire Police if required.

All consultations, where relevant, reflect the importance of reducing the harm caused by violence against women and girls.

Nottinghamshire Police have **no holding objections** with regards to the above proposed development, but we make several recommendations in the comments section of this letter.

We have also considered this application in the context of the legislation at the conclusion of this document.

Comments:

The development will take place in a higher than average crime location and will be vulnerable to crime during the construction stage. Advice regarding how the construction site should be secured to prevent crime and disorder can be found on page 6 of the latest Secured by Design Homes 2023 Guide (https://www.securedbydesign.com/images/HOMES_GUIDE_2023_web.pdf).

‘Secured by Design’ (SbD) is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. ‘Secured by Design’ is proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure, and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office, Building Control Departments in England (Part Q Security – Dwellings), Scotland (Building Standard 4.13) and Wales (Part Q Security – Dwellings) all reference SBD.

Secured by Design (SBD) is a place-based approach to crime reduction that brings together standards of physical security with the broader principles of Crime Prevention Through Environmental Design (CPTED) to set minimum requirements that enable properties to be awarded SBD status. The results of several studies have shown that housing design plays a key role in influencing offender decision-making, the risk of surveillance and standards of physical security being primary deterrents (Armitage & Tompson, 2022).

We have read the Design & Access Statement (DAS) but cannot see any mention of how crime and disorder will be prevented at the site.

Therefore, it is requested that the Secured by Design accreditation be achieved prior to occupation.

Crime prevention advice is given free of charge without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours faithfully,

Nick Butler MSc,
Nottinghamshire Police: Designing Out Crime Officer
Neighbourhood Policing Hub
Mansfield Police Station
Great Central Road
Mansfield
Nottinghamshire
NG18 2HQ

References:

Tseloni, A., Thompson, R. and Tilley, N., 2018. *Reducing Burglary*. New York: Springer.

Armitage, R. and Tompson, L., 2022. The Role of Crime Prevention Through Environmental Design (CPTED) in Improving Household Security. In *The Handbook of Security* (pp. 909-930). Palgrave Macmillan, Cham.

Legislation/Guidance.

Section 17 of the 'Crime and Disorder Act 1998' places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

Despite the whole raft of other legislation/guidance surrounding the planning process, there is no exemption from the requirement of Section 17 as above as all departments within a Local Authority fall under the umbrella of the 'responsible authority' status.

PINS 953 confirms the requirement of the Planning Officer to consider the requirements of Section 17, and this requirement has again been reinforced by way of letter from the Chief Planning Officer (issued 12th July 2017).

Planning Policy now places safety and security at the heart of the planning process.

The National Planning Policy Framework (NPPF) which defines three fundamental objectives to achieving a sustainable development: economic, social and environmental (NPPF, page 5, paragraph 8). Crime has a direct impact on all three objectives. This has been reinforced throughout the NPPF where the government makes clear its view of what sustainable development, in England, means in practice for the planning system. Specifically, Section 8 'Promoting healthy and safe communities', states that 'planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.'

Furthermore, Section 8, states 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the design and layout of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications.

This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.'

With the publication of the accompanying National Planning Practice Guidance (NPPG) (Note 7.5) the government has reiterated that designing out crime and designing in community safety should be central to the planning and delivery of new development. Specifically, the Planning Practice Guidance on Design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime and disorder and do all that they reasonably can to prevent crime and disorder.

Furthermore, practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. Note 7.5: The reference to Design within the NPPG can be found at:

<https://www.gov.uk/guidance/design-the-importance-of-good-design>.

Secured by Design is specifically referenced on page 61, Paragraph 144: 'Neighbourhoods need to be designed to make all people feel safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design which includes guidance for housing, commercial space, schools, hospitals and sheltered

accommodation.’ This section also references the value of working with Designing Out Crime Officers (DOCOs) and lays out the Secured by Design principles for creating safe and secure developments.