Communities and Partnerships Department

South Wales Police

Cowbridge Road

Bridgend

Julie.odgers2@south-wales.police.uk

1st May 2024

Angharad Hobbs Planner in charge

Vale of Glamorgan Council planning Department

Barry.

Dear Ms Hobbs,

**RE: Land off Sandy Lane, Ystradowen – APPLICATION NUMBER 2023/00948/FUL**

South Wales Police responded to this this application on the 11th of October 2023.

Having looked at the amended information we would like to ask that the following recommendations are taken into consideration.

South Wales Police would welcome working with the developer to achieve Secured by Design.

**Perimeter treatment:**

The units adjacent to the play area should ideally have defensible space to the side boundaries of the property marking private and public space e.g. a 1 m high fence, hedge, and also maintain good natural surveillance. It does not appear that these have windows in the gable ends.

**Secured by Design New Homes 2024 states**:

It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces; this type of elevation, commonly at the end of a terrace, tends to attract graffiti, inappropriate loitering, and potential anti-social behaviour. The provision of at least one window above ground floor level, where possible, will offer additional surveillance over the public area. 12.2 Where blank gable walls are unavoidable, one of the following methods should be used to protect them: Provide a 1m buffer zone using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content. Hedging will have to be protected with a fence until it becomes established. The hedge shall be contained within the boundary of the adjacent building to increase the likelihood that it will be maintained Where there is insufficient room to create defensible space between public and private space, an appropriate (non-destructive) climbing plant should be planted adjacent to the wall, or a finish applied to the wall that will allow easy removal of graffiti.

Boundary walls, bins, fuel stores, meter boxes, street furniture, trees, low flat roofs, car ports or balconies should be designed and located so that they do not provide climbing aids into the property.

**Reason: To prevent**

**Planting:**

Planting should not impede the opportunity for natural surveillance and wayfinding and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs should be selected to have a mature growth height no higher than 1m, and trees should have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance. As a general rule, building frontages should be open to view except, for example, houses standing in their own private grounds. Attention should be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property or obscure lights or CCTV cameras.

**Reason: To define defensible space and ensure natural surveillance.**

**Rear footpaths**:

**There are paths between units 10-21, 18-19 and 9-10 and 15.**

These should be gated as close to the front building line as possible to prevent unlawful access and to prevent hiding spaces being created.

**Recommendations:**

Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.

* It is preferable that footpaths are not located at the rear of properties. If they are essential to give access to the rear of properties, they must be gated. The gates must be placed at the entrance to the footpath, as near to the front building line as possible, so that attempts to climb them will be in full view of the street. Where possible the street lighting scheme should be designed to ensure that the gates are well illuminated.
* **Gates must be capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb over, crawl under or removed from their hinges and they should serve the least number of homes as possible, usually no more than four.**
* Gates will generally be constructed of timber when allowing access to the rear of a small number of dwellings. However, in larger developments where the rear footpath provides access to a large number of properties then a gate constructed of steel may be required by the DOCO. Substantial purpose made gates meeting LPS 1175 Issue 7 Security Rating 1 (A1) or Sold Secure SS323 Silver (minimum) standard is available and may be required by the DOCO. Any gate providing access to the rear of dwellings should be designed so as to resist being easily climbed over, crawled under, or being forced open and they must allow high levels of surveillance of the footpath from the street.

**Reason: to prevent unlawful access and enhance community safety.**

**Play area:**

Thought should be given to the design of the paly park and the equipment that is placed there as poor design has shown to result in instances of antisocial behaviour. South

**Recommendations:**

* The provision of inclusively designed public open amenity space, as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the 22 characters of the neighbourhood. In order to do this, it must be carefully located to suit its intended purpose – mere residual space unwanted by the developer is very unlikely to be acceptable. The open space must be inclusively designed with due regard for wayfinding, permeability and natural surveillance Adequate mechanisms and resources must be put in place to ensure its satisfactory future management and maintenance Care should be taken to ensure that a lone dwelling will not be adversely affected by the location of the amenity space It should be noted that positioning amenity/play space to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance.
* Play areas should ideally be designed so that they can be secured at night. This is to reduce the amount of damage and graffiti that occurs after dark. The type of fencing and security measures will need to vary to suit the particular area. However, consideration should be given to a single dedicated entry and exit point to enable parental/guardian control and supervision. Fencing at a minimum height of 1.2m can often discourage casual entry, provide a safe clean play area and reduce damage to the equipment. The specific requirements such as child safeguarding, preventing dogs entering, etc. should be discussed with the DOCO.
* 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 local residents will not suffer from possible noise pollution. In addition, they should be sited in such a way that those using adjacent foot and bicycle paths will not be subject to harassment or otherwise be put in fear.
* The positioning of benches/seating should be well thought out and have arm rests.

**Reason: To prevent antisocial behaviour**

**Gates:**

There are several lanes where access is gained to the rear of properties, gates should be included to eliminate any hiding places and opportunity for antisocial behaviour.

**Recommendations:**

* **Gates to the side of the dwelling that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked (operable by key from both sides of the gate). Such gates must be located on or as near to the front of the building line as possible.**
* Vulnerable areas, such as exposed side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. There may be circumstances where more open fencing is required to allow for greater surveillance. Trellis topped fencing can be useful in such circumstances.

**Bin storage:**

The plans show that the bin storage has a lock. It is advised that this is a digital lock.

**Windows and door security/access control**:

The crime figures have been included in this report. Window and door security is important and ensures that residents feel safe in their homes.

“It is vitally important that SBD approved developments have the correct level of security specifications for door-sets and windows and that the selected doors for any development have been tested against the requirements of BS 6375 and are classified according to their intended use. This is particularly important when deciding on the relevant door-set for an Apartment Block, as the usage will be much higher. Therefore, specifiers should satisfy the DOCO that the door-set is fit for its intended purpose and environment as in Section 22 of Secured By Design Homes Guide 2024 -  [HOMES\_GUIDE\_2024\_web.pdf (securedbydesign.com)](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.securedbydesign.com%2Fimages%2FHOMES_GUIDE_2023_web.pdf&data=05%7C01%7CJulie.Odgers2%40south-wales.police.uk%7Cff0da671010f4901887308db940d27e0%7C270c2f4dfd0c4f0892a9e5bdd8a87e09%7C0%7C0%7C638266556443659952%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=IzGIdPj50K3c06yGpGREVqkMRATBgeQZoQFtnJ3yR9s%3D&reserved=0)” please see the requirements on pages 32 -45 doors and window requirements 55 – 62 is the requirement for the door sets and access control.

**For this development:**

**Ground floor and accessible windows should meet PAS 24:2022**

**All fire doors should be triple tested for fire, smoke, and security.**

**For all communal doors: LPS 1175 (SR 2) with a compatible access control system UL 293.**

Outward opening door sets installed within SBD developments must specifically form part of the certificated product range.

**Individual doors to each apartment should be to PAS 24: 2022**

As part of the application testing certificates or third-party testing certificates will be required all doors/ windows and access control systems.

On final inspection PAS 24:2022 stickers will need to be displayed on all doors and ground floor windows.

The suggestion is that the documentation for testing is checked/supplied when the doors/windows are ordered.

There is a glazed panel adjacent to the front door on Block B – the whole door set, and glazing will need to be tested together.

The utility store – these doors should be to LPS 1175 SR2 standard or equivalent, to prevent unlawful access being gained to the plant/ utility room. There should be a robust access control system and a closure arm installed.

If glazed pals are installed adjacent to the door set and are an integral part of the doorframe then they should be tested as part of the door. Alternatively, where they are manufactured separately from the doorframe, they shall be certificated to either: PAS 24:2022, or PAS 24:2016\*, or STS 204, or LPS 1175 at a Security Rating to match the door set, STS 202 at a Burglary Resistance to match the door set 16 \*PAS 24:2016 has been withdrawn by the British Standards Institute and replaced by PAS 24:2022, however PAS 24:2016 will continue to be an acceptable route to compliance until 31st December 2024.

Break glass emergency door exit release devices (often green in colour) on communal external doors that provide an important aid to egress in the event of an emergency have proven to be abused rendering some buildings insecure for long periods of time. SBD recommends vandal resistant stainless steel self-resetting emergency exit systems are installed as an alternative. The installation and system type must be in full compliance with the relevant Building Regulations and achieve final ‘sign-off’ by local Building Control or Approved Inspector.

If the break glass emergency door release device provides access to residential areas as part of the emergency egress route, additional security must be provided to restrict access to the fire egress route only to maintain the security of the building line. This is also a requirement of Part Q of the Building Regulations (England and Wales).

**Reason: To prevent theft/ burglary**

**Management plan:**

A robust management plan needs to be in place before habitation to ensure that there is a system in place should fob or similar get lost or damaged or if there is damage to the access control system.

There should also be clear advice about the storage of litter and collection.

A Maintenance plan should also be in place to regularly cut back hedges and trees as above.

There should also be a clear invacuation/evacuation plan in place and agreed with the fire service.

**Policy Support**

* The Crime & Disorder Act 1998 created a statutory partnership between local authorities, the police, and other key partners to work together in reducing crime and disorder in all aspects of their work.
* Section 17 of the Act states:

“It is the duty of the authority to exercise its various functions with due regard to the likely effect on crime and disorder in its area and the need to do all that it reasonably can to prevent crime and disorder.”

* TAN 12 Design. Para 5.17.1 “Local authorities are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998. Consideration should be given to practical ways in which the design of development can reduce opportunities for crime, disorder, and anti-social behaviour.”
* Planning Policy Wales
* 4.10.12 Local Authorities under Legal Obligation to consider the need to prevent and reduce crime and disorder…..
* 8.2.1. – Transport – Provision of safe, convenient, and well signed routes
* 9.1.1. –Housing – Objective to provide homes that are in good condition, in safe neighbourhoods and sustainable communities
* 9.1.2. Housing – Greater emphasis on quality, good design, and the creation of places to live that are safe and attractive.

If you have any questions, please do not hesitate to contact me.

Yours Sincerely

Julie Odgers

**Designing out Crime Officer**

***Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. South Wales Police welcome’s receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.***