



NORFOLK
CONSTABULARY
Our Priority is You

Breckland Council

via email

Date: 16th December 2025

Norfolk Constabulary

Community Safety
King's Lynn
Norfolk

Dear, Mr. Andrew Darcy,



www.norfolk.police.uk
Non-Emergency Tel: 101

Swanton Morley Neighbourhood Plan.

Thank you for your e-mail inviting comments on the above matter. I have also forwarded your request to the Constabularies Head of Estates [REDACTED] for his thoughts.

You are already familiar with the Constabulary assessing Planning Applications to ensure that the County does **NOT** have to suffer the consequences of poor design that could become a legacy on the community and authorities alike.

As a Designing Out Crime Officer my role within the planning process is to give advice on behalf of Norfolk Constabulary in relation to the layout, environmental design and the physical security of buildings, based upon the established principles of 'Crime Prevention through Environmental Design'.

The government's Chief Planning Officer wrote to all planning authorities reminding them of the important role the planning system plays in ensuring appropriate measures are in place in relation to crime prevention and security.

The police service places great importance upon the need to build sustainable and inclusive communities and to raise awareness of the significant impact that low crime makes to the ongoing and long-term sustainability of good business and commerce.

Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Secured by Design Initiative widely supports; however, it is imperative that they must also be safe, secure, and accessible. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, cohesive, vibrant, and participatory communities.

Crime, the fear of crime and the unhappiness and disorder they create significantly damages communities. It is a reasonable expectation that all those with some responsibility for the built environment from local authorities and the police to architects, builders, and developers, include crime prevention measures in their work; creating environments that reduce opportunities to commit crime with design led solutions is a cost effective, resource efficient and highly impactful means of improving the quality of life.

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We will answer letters within 10 working days, where information is available.
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Awarded for excellence



INVESTOR IN PEOPLE

The way Secured by Design works is to deter criminal and anti-social behaviour through the design, layout and specification of buildings and the spaces around and between them, that serve to reduce easy opportunities for crime.

It is argued that more crimes are committed where a criminal feels more comfortable committing them, for instance where a physical environment offers easy unrestricted or at least uncontrolled access, where clear messages of ownership are absent, where either natural and formal surveillance are absent or where wrong doers feel free to move within an area assured of their anonymity.

Design-led solutions to prevent crime will include ample opportunity for natural surveillance, high quality public lighting, clearly defined and well overlooked defensible spaces, the eradication of unnecessary foot routes and see these routes concentrated together with busier traffic routes, the sensible and sensitive positioning of play and leisure areas, the provision of clear and appropriate boundary treatments and the careful removal of any chances to hide unseen to create ambush points.

An obvious advantage of creating spaces with clear sight lines across and around them that do not provide places where anyone can hide, is the fact that people can see for themselves that they're safe moving through an area that reassures them.

These thoughts align with:

The National Planning Policy Framework December 2024 which requires 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....

And that:

“The layout and design 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”.

Furthermore:

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.

I would therefore encourage the Parish Council to consider requesting that all future applications work towards achieving the full Association of Chief Police Officers Crime Prevention Initiative **Secured by Design** Awards.

To assist in this vision there are Residential, Commercial, and Educational Developments Design Guides available from www.securedbydesign.com which explain all of the crime reduction elements of these schemes.



The guides are separated into sections; Section 1: Deals with the development layout and design and all external features and Section 2: Provides the detailed technical standards for various elements of the buildings.

The interactive design guide <https://www.securedbydesign.com/guidance/interactive-design-guide> is also a very good and self-explanatory tool that can walk you through the various elements of designing out crime in a visual manner.



These key design guides should help all applicants to ensure that they have submitted a considered Planning Application.

Secured by Design aims to achieve a good standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety.

Experience shows that incorporating security measures during a new build or refurbishment reduces crime, fear of crime and disorder.



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The aim of the Police Service is to assist in the Design process to achieve a safe and secure environment for residents and visitors without creating a “fortress environment”.

All new developments should provide a venue that makes the most from the proven crime reduction methodologies of Secured by Design gained from over **thirty five years** policing experience and supported by independent academic research.

The Constabulary is consulted by all of the Counties Planning Authorities with regards to this subject and offers appropriate advice.

Key issues are:

Creating a sense of place

Rule Setting is a key principle of crime reduction. We all follow Rules in life, but they have to be there; to be followed. I would suggest that the main entrances to any development should ideally have a brick pillar style entrance; this is proven to create a “symbolic barrier” to give the impression that the area beyond is Private to the general community and deter casual intrusion by non-residents. To support this a change in road surface such as a simple strip of granite sets reinforces the message and creates a sense of place.

Defensible space has the simple aim of designing the physical environment in a way which enables the staff and residents to control the areas around their home. This is achieved by organising all space in such a way that staff and residents may exercise a degree of control over the activities that take place there. A key principle of Crime Prevention Through Environmental Design is to restrict access to unobserved areas putting all visitors to the on view street scene.

Permeability

It can be a challenge to balance connectivity and access in a manner that does not compromise the safety and security of the residents. Excessive permeability is a design feature that is consistently linked to higher crime rates. It is important to limit access to residents and their legitimate visitors. Care needs to be taken to provide appropriate access for new developments.



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Environments that are short in length and not linked by footpaths can be very safe environments in which residents' benefit from lower crime. A review of available research in this area concluded that: "Neighbourhood permeability... is one of the community level design features most reliably linked to crime rates, and the connections operate consistently in the same direction across studies: **more permeability, more crime**. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates..."

Of course any new development does have an impact on the surrounding environment. Often new homes carefully consider and incorporate vehicular and pedestrian routes that are visually open, direct and well used with high levels of natural surveillance and modern lighting.

Connecting a new development to an adjacent traditional or period design requires careful thought. Older designs can often be intimidating to walk along and also run in between and at the rear/sides of homes.

Also with our minds on doing all we can to tackle violence against women and young girls; Currently existing footpaths that are intimidating to use and do not have the benefit of today's design features, are being recorded by the public as such, on the streetsafe platform. **It would be a "missed opportunity" should new designs instantly get recorded as unsafe.**

In addition, they should be sited in such a way that those using adjacent foot and cycle paths will not be subject to harassment or otherwise be put in fear.

Lighting

To work in harmony with high levels of Natural Surveillance, a carefully designed Lighting plan to cover all vulnerable areas should be in place. This will help to deter and reveal potential offenders and a uniform spread of white light to meet the updated British Standard **BS5489-1:2020** is required.

Secured by Design supports the Institution of Lighting Professionals (ILP) in encouraging a variable controlled lighting level. Please note/ Bollard lighting is purely for wayfinding and can be easily obscured. It does not project enough 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 as the sole means of lighting. Lighting is required to each dwelling elevation that contains a doorset and can also assist in identifying the door and operating locking mechanisms.

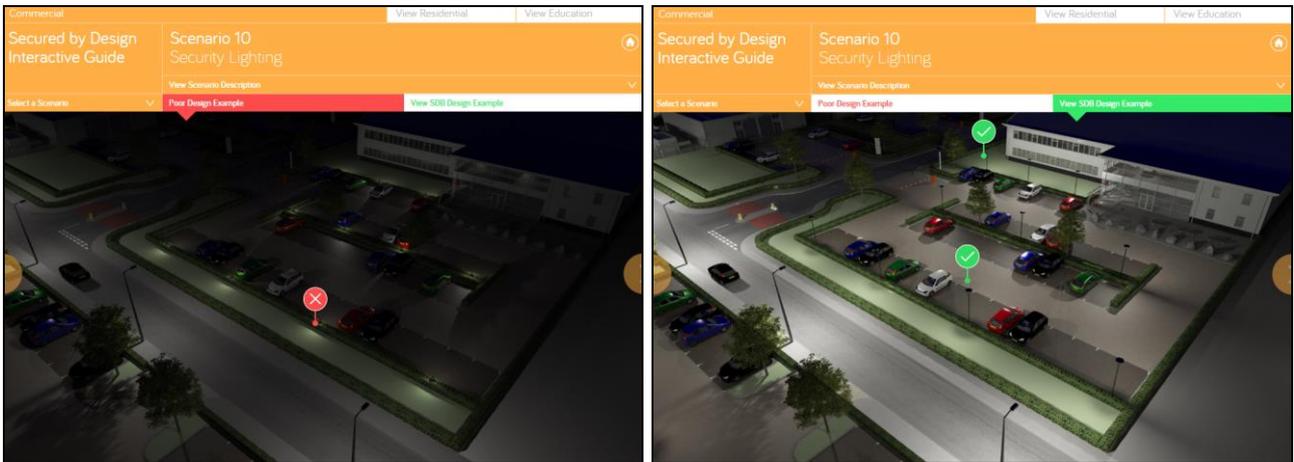
Secured by Design has not specified PIR activated security lighting for several years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst older people) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.

Lighting design should be coordinated with a CCTV installation (when specified) and the landscape designed to avoid any conflicts and to ensure that the lighting is sufficient to support a CCTV system.

It is recognised that some local authorities have 'dark sky' policies and deliberately light some of their rural, low crime areas to very low levels of illumination. Some are currently experimenting with switching off streetlamps in low crime areas between certain hours of the night to save energy costs and reduce CO2 emissions. If such policies exist, then these must be brought to the attention of the DOCO at the time of application.



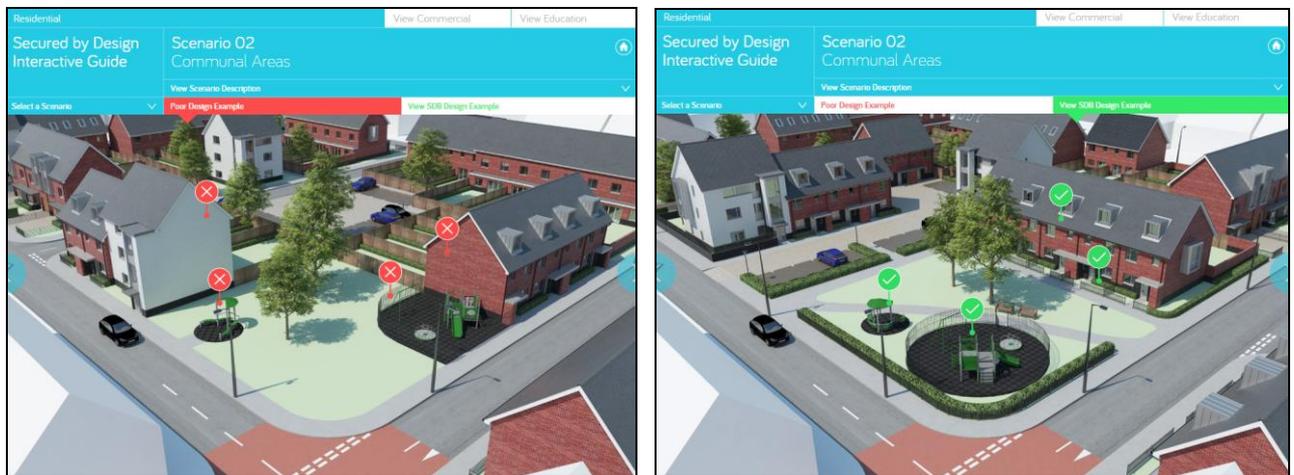
A good lighting system is one designed to distribute an appropriate amount of light evenly with Uniformity Values of between 0.25 and 0.40 using lamps with a rating of at least 60 on the Colour Rendering Index. A Uo value of 0.4 or 40% is recommended to ensure that lighting installations do not create dark patches next to lighter patches where our eyes would have difficulty in adjusting quickly enough for us to see that it was safe to proceed along any route.



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Natural Surveillance

The new designs should avoid blank windowless elevations to promote developments that increase Natural Surveillance and deter inappropriate loitering. This is essential to maximise overlooking from active windows over access routes and amenity space.



The landscaping plans need to provide all specified shrubs and hedges that have a maximum growth height of one metre, whilst all trees should be “up pruned” to a minimum height of two metres to maintain a clear field of vision around the site. An environment that provides a “see and be seen” style will reduce crime and anti social behaviour. The proposal should then provide a design that continues with clear lines of sight and the avoidance of alcoves, recessed areas or opportunities for offenders to loiter in anonymity.

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Parking

The provision for car parking should ideally be adjacent to the buildings with active windows overlooking and have appropriate levels of Natural Surveillance. It is always important to ensure that the vehicle owners are provided with a view of their vehicle to offer the best protection. This feature may become more relevant with the increase of electric charging of vehicles.

Having blank elevations adjacent to hard surfaced driveways does not provide appropriate surveillance and these can be ideal future “kick walls” for ball games or encourage inappropriate loitering and the potential for anti social behaviour or graffiti. Of course first floor level or frosted bathroom windows do not provide appropriate active windows for important surveillance.

Unobserved parking provision creates vulnerability and will need to be appropriately addressed for all residents parking positions.

Any vulnerability is easily rectified by the inclusion of additional active windows to these private driveways. Such windows do not have to be large and can be staggered between homes to avoid any *overlooking* concerns.

For larger sections of parking It would be a wise move to consider the design criteria for car parking laid down in the police owned ‘ParkMark’ initiative. Further information can be found at www.parkmark.co.uk

Cycling

The securing of cycles left unattended must be considered within the design of any new development. The position of any cycle storage area requires the same level of attention as for car parking and again should be positioned with active windows overlooking and have appropriate levels of Natural Surveillance.



★ These structures should always be the default standard used today.



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Often cycle storage areas are very low on the list of priorities in a new scheme and get tucked away in a corner making them vulnerable to crime. Careful thought is required regarding the positioning of a cycle store to truly promote cycling.

The cycle stand must facilitate the locking of both wheels and the crossbar. Hooped rings set into the ground do not provide for this. There are several secure cycle options detailed in the “member companies” section of Secured by Design. These professional structures have been security tested to achieve accreditation.

I would prefer to avoid canopies for cycle storage areas unless they are completely secure buildings with appropriate access control measures installed. Canopies have been used in the past as gathering points or shelter areas where a potential offender’s presence is legitimised. This provides opportunity for crime.

External bicycle parking facilities should be designed for secure storage using bicycle lockers, hangers or dedicated storage devices and be certified to one of the following minimum standards: Sold Secure - SS104 Silver, or STS 501 Security Rating TR2, or STS 503 Security Rating TR2, or 53 STS 205: Issue 6 2021 Security Rating BR2, or STS 225: Issue 1 2021 Security Rating BR2 (S), or LPS1175: Issue 8 2018 Security Rating B (B3).

I would also advocate promoting both cycle security and cycle marking/registration. The Constabulary and indeed every Police Force in the United Kingdom uses the **BikeRegister** database to search for stolen and recovered cycles. You can register your cycle on to this National Police Approved Data Base for free. You can also pay a fee and upgrade this registration with marking systems and labels to reduce the risk of becoming a victim.

How does **BikeRegister** work?



1

Register your bike

Add your bike details to our National Police-approved database for free



2

Mark & Protect

Mark & Protect your bike with one of our security marking kits



3

Apply warning label

Reduce your risk of theft by warning thieves that you use BikeRegister

You are 83% more likely to have your cycle stolen if it is not marked!

Boundary treatments

Moving to the boundary treatments; It is expected that developers will install fencing to a high standard to ensure the security and longevity of the boundary. A high-quality fence that lasts for a long time will provide security and reduce overall maintenance costs for residents or landlords.



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It has become popular to set back some boundary treatments from the street scene but this does offer a recessed area where a potential opportunist offender could be concealed.

It is essential to reduce these opportunities and place boundaries closer to the front elevation/building line.



Terraced homes are a particular challenge to provide access to their rear gardens and yet the safety and security provided by a robust perimeter boundary. Some robust shared alleygates across the developments will need incorporating to provide for this essential measure to reduce the risk of burglary.

Care also needs to be taken to avoid providing a stepping platform opportunity from low demarcation fencing that is adjacent to any rear perimeter treatments. The below images are Norfolk developments where this particular risk has not been addressed, making the homes vulnerable to crime.



A combination of defensive planting measures 1.5M boundary treatments topped with 0.3M trellis or railings may be appropriate to sections of any design especially along the  elevations overlooking any adjacent development or open fields.

Some 85% of house burglaries occur at such vulnerable positions.



This should allow the potential for surveillance from active rooms and yet security and privacy to resident's gardens.



Formal Surveillance

Although Closed Circuit Television is not a universal solution to security problems. It can help deter crime and assist in the management of a venue if it is monitored continuously and appropriately recorded.



The provision of CCTV is most effective when it forms part of an overall security plan. It is essential that developers are very clear about the objectives they wish to meet and establish a policy for its use and operation before it is installed.

It is important to seek independent advice before approaching an installer and to develop a comprehensive **Operational Requirement** for the system, which can be supplied to installers during the tendering process. An operational requirement will be used for the design, performance specification and functionality of the CCTV system. In effect, it is a statement of problems, not solutions and will highlight the areas that must be observed by the system and the times and description of activities giving cause for concern.

The recommended standards for the surveillance camera industry can be found at: www.gov.uk/guidance/recommended-standards-for-the-cctv-industry

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CCTV systems must be installed to **BS EN 50132-7**: CCTV surveillance systems for use in security applications. For guidance on the use of CCTV images as legal evidence, see **BS 7958:2015** Closed circuit television (CCTV). Management and operation. Code of practice. This document provides guidance and recommendations for the operation and management of CCTV within a controlled environment where data that may be offered as evidence is received, stored, reviewed, or analysed. It assists owners of CCTV systems to follow best practice when gathering information of evidential quality. Remotely monitored detector activated CCTV systems must be installed in accordance with **BS 8418:2021** Design, Installation, Commissioning and Maintenance of Detection-Activated Video Surveillance Systems (VSS). Code of practice.

Specifiers are reminded that there will be a requirement for a data controller to ensure compliance with the GDPR. The data controller must ensure that all CCTV images that can be used to identify individuals are used, stored and disclosed in line with the GDPR principles.

Security Standards

The homes themselves should be designed to incorporate Section 2: Physical security elements of the Secured by Design Award. This section provides the 'Police Preferred Specification' for all physical security requirements for new or refurbished homes. Section 2 of the guide is separated into two sections; Section 2a reflects the requirements of the UK Building Regulations and Section 2b addresses bespoke new homes and existing homes.

This provides external doorsets and windows intended to offer a level of security suitable for dwellings and other buildings exposed to comparable risk and intended to resist attack normally associated with the casual or opportunistic burglar. The main access to buildings such as flats will need to have a robust doorset that reflects the nature of the buildings intended use. It will experience significantly more use than the individual home doors.

With appropriate adjustments being incorporated into new developments it will remove the vulnerability present in their design.

The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It also has a significant impact on anti-social behaviour.

If you should wish to discuss any of my comments, or require some assistance with a Secured by Design applications, then please do not hesitate to contact me.

I am very keen to help in any way I can to provide future developments that reduce the opportunity for crime and reduce the fear of crime, creating a safer more secure and sustainable environments for future residents and visitors to Swanton Morley.

Yours sincerely

[Redacted signature block]

Norfolk Constabulary

[Redacted contact information]

