



Suffolk Constabulary
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Local Plan for the Broads Public Consultation
28 July to 26 September 2025

This is the last round of consultation before we submit the Local Plan.



You can find the Publication Consultation here:
www.broads-authority.gov.uk/about-us/how-we-work/transparency/consultations

Hard copy will be at these venues (check websites for opening times):

- **Libraries:** Acle, Beccles, Brundall, Bungay, Cromer, Great Yarmouth, Loddon, Lowestoft, Oulton Broad, Norwich Millennium, Stalham and Wroxham.
- **Council Offices:** Broadland and South Norfolk, North Norfolk, Norfolk County.
- **Yare House** (Broads Authority)

Suffolk Constabulary is pleased to have the opportunity of commenting on the consultation for the Local Plan for the Broads (Public Consultation).

DESIGNING OUT CRIME OFFICERS (DOCO)

Designing Out Crime Officers (DOCOs) provide security and crime prevention advice in relation to the built environment, at every stage of the design process, in an attempt to minimise potential crime, disorder and anti-social behaviour in any proposed development.

They seek to work with planners and developers to provide advice on residential, school, hospital and commercial planning applications.

Suffolk Constabulary is supported by four DOCOs. Their duties encompass the former Architecture Liaison, Crime Prevention and Problem-Solving Officer roles.

Crime Prevention attempts to reduce and deter crime and criminals, enforce the law, and maintain criminal justice.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The following regulations and guidance are designed to ensure that Crime Prevention is maximised at the planning stage and thereafter and should be included as part of the **Local Plan for the Broads policy**.

Crime and Disorder NPPF Policies that are applicable to developments are Para 96(b), 102(a) and 127(f). 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.

Further guidance on UK Planning and strategic policies in support of SBD can be found within [SBD Homes 2025 Section 7](#).

SECTION 17 OF THE CRIME AND DISORDER ACT 1998 (CDA)

This part of the CDA 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'*.

SECURED BY DESIGN (SBD)

An early input at the design stage is often the best way to promote a partnership approach to reducing the opportunity for crime and the fear of crime. Secured by Design aims to achieve a good overall 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 creates a sense of ownership and responsibility for every part of the development. These features include secure vehicle parking, adequate lighting of common areas, access control, defensible space and a landscaping and lighting scheme which enhances natural surveillance and safety. Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

Secured by Design principles are detailed in 'User Guides' for Housing, Commercial and School developments.

Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% - 75% and ensure compliance with Approved Document Q (ADQ - which applies to dwelling developments) [Secured by Design - Building Regulations for Security](#)

OBSERVATIONS IN RESPECT OF THE BROADS LOCAL PLAN

Suffolk Constabulary advise that security and safety are key to any design within the Broads Local Plan. A good design will minimise both the opportunity for crime or the perception of the fear of crime which will encourage a positive and healthy community.

Having reviewed the guidance documents outlined within the consultation, Suffolk Constabulary acknowledge that security, safety, good design measures as well as Crime Prevention Through Environmental Design (CPTED) and Secured by Design principles have been outlined in the [Design Guide and Code for the Broads - Supplementary Planning Document](#)

- BA13 Security statement (page 75) states the following:
BA13 Security
BA13-1 General
 - ✓ *The design and layout of development must be safe and secure, with natural surveillance. Measures to reduce the risk of crime and anti-social behaviour should be considered at an early stage so as not to be at the expense of overall design quality.*
 - ✓ *All new development should confirm to the Secured by Design principles and be in line with the Crime Prevention Through Environmental Design (CPTED) principles as appropriate. The Secured by Design Interactive 3D Design Guide may be of use.*

There is further reference that CPTED and SBD standards should be addressed, within the Local Final Plan: Standing Orders – draft for 2024:

- Local Final Plan: [Standing Orders - draft for 2024](#)
Policy PUBDM52: Design (Pg 258)

h) Crime prevention: The design and layout of development should be safe and secure, with natural surveillance. Measures to reduce the risk of crime and antisocial behaviour should be considered at an early stage so as not to be at the expense of overall design quality. Schemes should address Secured by Design standards and be in line with Crime Prevention Through Environmental Design (CPTED) Principles as appropriate

i) Accessibility and adaptability references that all homes should be designed and built to meet requirement M4(2) of Part M of the Building Regulations unless it can be robustly demonstrated it is not practicable to do so.

Within the order under Crime Prevention (pg. 262) it defines the attributes of a good design which includes safer places. It *outlines the importance of a new development being designed to minimise both the opportunity for crime and the perception or fear of crime*. It references the secured by design guides and use of the interactive design guide to gain further knowledge of the principles and process.

Furthermore, the East Suffolk Council '[Healthy Environments Supplementary Planning Document](#)' June 2024, which is covered under the Supplementary Planning Documents and other guidance on matters covered by the Local Plan, is one part of the material considerations used in the decision making.

Through this planning document there are various references to ensure that the design considers safety and security of residents and users.

Healthy Environments:

Design Prompts 6.27 (pg. 207) asks one of its pointers that is to be assessed, "Does the design of the neighbourhood... support **safety** in the public realm?"

Finally, Section 7 'HIA - Healthy Impact Assessments' (pg. 209) is outlined by the World Health Organisation (WHO) as "a practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups. The essential purpose of HIAs is to identify and inform designers and decision makers of the key potential benefits or potential harm arising from the development. This information can then be used to '[design out](#)' or adequately mitigate the potential harm and inform an improved iteration of the design."

Within this document is *Table 37* provides key assessment areas for HIA by SPD Chapter. Suffolk Constabulary have identified below, some of those chapters which recognise safety and security measures and specifically identifies designing out crime.

There is an alignment within the HIA and the principles of Designing out Crime and guidance should be sought from the Design out Crime Officer to ensure those areas are met within the HIA and planning process.

- Chapter 2. Green Infrastructure (pg. 215) outlines "safety in open spaces" as a key assessment matter which falls within Crime Prevention through Environmental Design principles as well.
- Chapter 3. Active Travel (pg. 216) outlines "safety and security in public realm (streets) – designing out crime and designing in natural surveillance is identified as a key assessment matter. It also references the provision of secure cycle parking.
- Chapter 4. Healthy Homes, Schools and Workplaces (pg. 217) states that "healthy buildings should ensure the design of homes, schools and workplaces support health and wellbeing, active lifestyles, **safety and security**, accessibility (e.g. M4(2) homes) and reduce inequalities by ensuring homes and

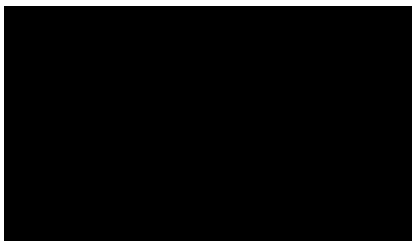
amenities are tenure blind in provision, appearance and access". Part of the key assessment criteria in this section identifies "***Safety and security – designing out crime, designing in natural surveillance, health and safety matters, etc.***"

This requirement embeds CPTED and SBD principles within the planning process.

- Chapter 5. Healthy Centres & Community Facilities (pg. 218) refers to "Safety in public realm (centres)" which will be within the remit of Suffolk Constabularies Designing out Crime principles.

In summary, Suffolk Constabulary have identified the above policies/guidance which require safety and security to be embedded within all future Local Broads Plans/developments.

It is therefore recommended that through those policies and guidance developers and planners are required to ensure Secured by Design and CPTED principles are adhered to and consult with a Suffolk Constabulary Design Out Crime Officer, to ensure that crime and disorder or the fear of crime and disorder will be reduced in any future developments within the Suffolk Broads area.



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24/9/25

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