

Planning Department
Broads Authority



NORFOLK
CONSTABULARY
Our Priority is You

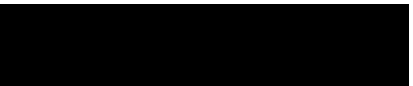
via email

Norfolk Constabulary

Community Safety
King's Lynn
Norfolk

Date: 6th January 2026

Dear, Planning Policy Team,



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

Consultation on Broads Authority Local 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 (Mr. Duncan Potter) for his thoughts.

Norfolk Constabulary provides Designing Out Crime Officers to assist in the planning process and to offer advice 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 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 well-designed buildings.

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.

Nationally the Police Service achieves this by joining together and delivering the Secured by Design initiative to deter criminal and anti-social behaviour through the design, layout and specification of buildings and the spaces around and between them, 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.



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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 are 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....***

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.

And: ***In addition, our National Design Guide, published in 2019, refers to the importance of designing out crime when developing new homes, and Government’s forthcoming guidance on producing local design codes will set out how homes and neighbourhoods must be designed with safety and security in mind by applying the principles of Secured by Design. This includes using passive design measures, such as ‘eyes on the street’ and appropriate layouts for homes.”***

Experience shows that incorporating security measures during a new build or refurbishment reduces crime, fear of crime and disorder. The aim of the Police Service is to assist in the Design process to achieve a safe and secure environment for staff, patients, and visitors without creating a “fortress environment”.

Consultation with the Constabulary is “free of charge” as the reward is a development that will experience less crime. This is by far the most efficient way in which to proceed with developments and is the correct approach to reduce criminal opportunity. I would be pleased to work with applicants. This is by far the most efficient way in which to proceed with projects and is a partnership approach to reduce criminal opportunity.

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 years policing experience and supported by independent academic research.

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

There are Residential, Commercial, and Educational Development Design Guides available from www.securedbydesign.com which explain all the crime reduction elements of these schemes.



They 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.

There are also detailed interactive design guides available illustrating all the crime reduction elements of design to aid applicants. These Interactive Design Guides are very good and self-explanatory visual tools and can be found using this link:

<https://www.securedbydesign.com/guidance/interactive-design-guide>



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

Creating a sense of place

The main entrances to any development should ideally have a defined style; 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.

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.

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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It is essential that the homes, as you move around the proposed development, need to set the scene and provide appropriate guardianship levels with active elevations over the entrances, open space, vehicular/pedestrian/cycle access routes and activity areas.

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.



The Constabulary could Not support such vulnerability in any New Application.

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. The lower level of use they experience for their current development and their existing design may be something that is tolerated but the increased demand from a further development of new homes will require consideration regarding their vulnerability. Also, with our minds on doing all we can to tackle violence against women and young girls; currently existing footpaths and spaces that are intimidating to use are being recorded by the public as such, on the streetsafe platform. We need to ensure that new developments do not get instantly recorded as unsafe and we need to reduce the risk to the community wherever possible.

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 open space must be inclusively designed with due regard for wayfinding and natural surveillance. We know that Communal areas, such as playgrounds, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.

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.



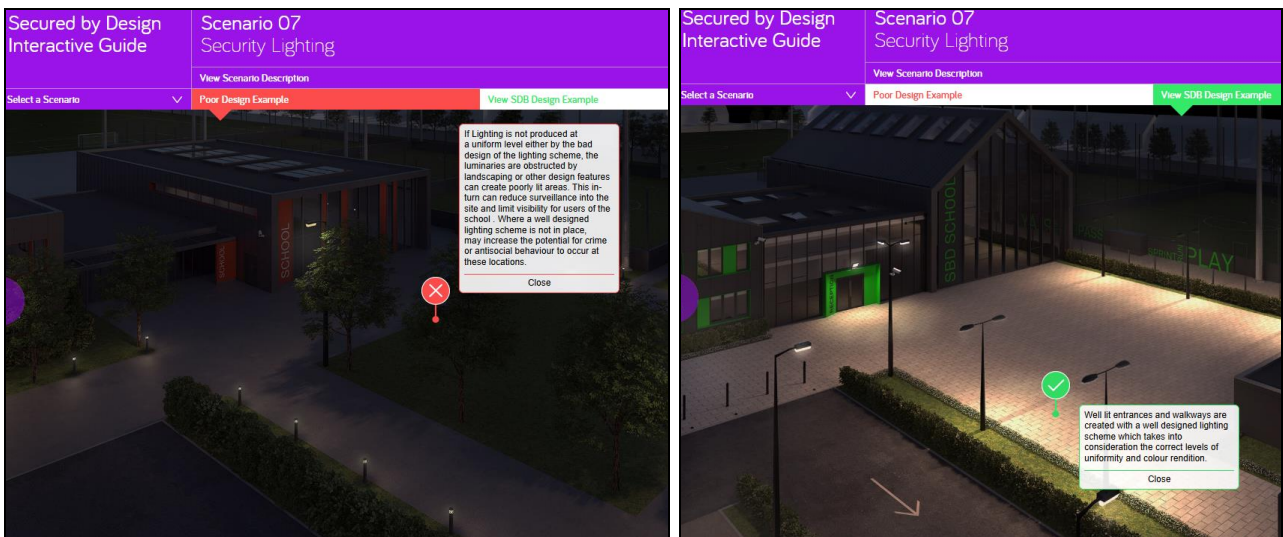
The homes need to set the scene and provide appropriate guardianship levels with active elevations over the entrances, open space, vehicular/pedestrian/cycle access routes and activity areas.



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.



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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. 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.

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.

Secured by Design supports the Institution of Lighting Professionals (ILP) in discouraging 'switch off' unless a full risk assessment has been carried out, and the ILP also recommends that 'switch off' never be implemented purely for cost saving. A variable controlled lighting level is always the preferred option in addition to one which does not disadvantage disabled and older people who may have a sensory impairment and require well-lit routes to enable easy wayfinding and to make other users more easily visible. Attention to position and location of lighting to improve illuminance at ground level can avoid user casting shadows onto the surface whilst minimising light pollution

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.

Many vehicles will be left on driveways so it is always essential that **active windows** overlook parking spaces with appropriate levels of Natural Surveillance being provided. It is always important to ensure that the vehicle owner is provided with a view of their vehicle to offer the best protection.

Of course blank elevations, bedrooms, utility rooms or first floor level or frosted bathroom windows do not provide appropriate **active** windows for this important surveillance.

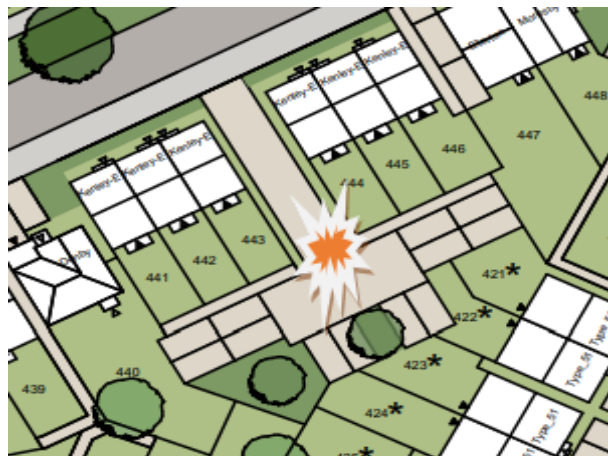
Unobserved parking provision creates vulnerability and will need to be appropriately addressed for all residents parking positions. Any vulnerability is easily rectified by the inclusion of additional active windows to these private driveways. Such windows do not have to be large and can be staggered between homes to avoid any *overlooking* concerns. Often it can be a matter of *handing* House Types to provide active side elevations or trellis topping the relevant boundary.



Such vulnerability should not be present in a new design of today. It is always important to ensure that the vehicle owner is provided with a view of their vehicle to offer the best protection.

I would have reservations regarding the use of secluded parking courts. These can present a challenge and the photograph's (that follow) are of a similar feature in a Norfolk village. Once constructed they are often abandoned as a parking court but used as a playground. Often ball games in such confined hard surfaced areas amplify the noise and become a nuisance for residents.

Also, homeowners prefer to park their vehicles where they can see them and generally park opposite their front windows. On occasion blocking the footpaths and causing danger to pedestrians. They can also provide blank walls at the entrance which can be subject to abuse. I would not promote their use on a new development.



A residents vehicle is usually their second most expensive purchase in life and deserves such guardianship levels.

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



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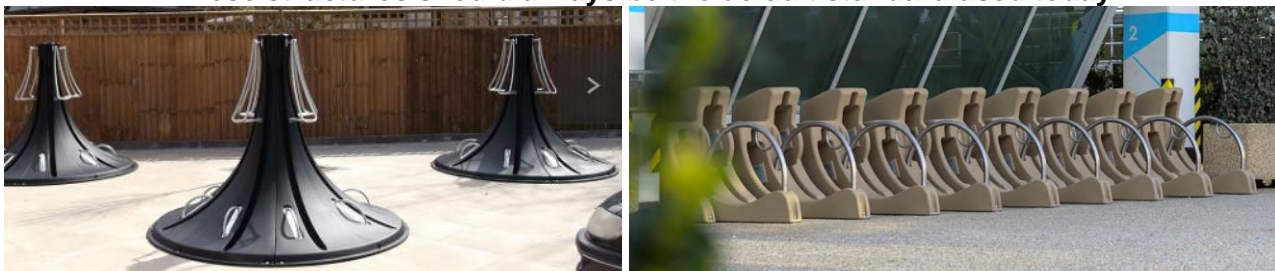
Cycling

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.

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.



These structures should always be the default standard used today.



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.

How does **BikeRegister** work?



We will answer letters within 10 working days, where information is available. Where this is not possible, an explanation will be given for any delay.



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.

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

Boundary treatments

It is expected that developers will install fencing to a high standard to ensure the security and longevity of the boundary. I am sure that this would be the case. A high-quality fence that lasts for a long time will provide security and reduce overall maintenance costs for residents or landlords.

Care also needs to be taken to avoid providing a stepping platform opportunity from low demarcation estate fencing that is adjacent to any rear perimeter treatments.

Additional deterrent features such as increasing the height of fencing or planting thorny shrubs may be considered as an alternative. The images below are Norfolk developments where this particular risk has not been addressed, making the homes vulnerable to crime.




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

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.

Removing poorly observed segregated footpaths that would give access to the rear or side of the new or existing homes is essential and the Secured by Design guide provides details of how these measures are best achieved.

A wide range of specimens can be planted along the boundary of a property, which offer attractive planting characteristics of colour and form, whilst containing sharp thorns to dissuade intruders. Many species are available which may be trained to any shape, size, or height. Ornamental specimens such as rose may be attached to a fence to deter climbing.

A combination of defensive planting measures 1.5M boundary treatments topped with 0.3M trellis or railings may be appropriate to some applications. This should allow the potential for surveillance from active rooms and yet security and privacy to the gardens concerned. 



Terraced homes can provide a challenge to allow for access to their rear gardens and yet the safety and security provided by a robust perimeter boundary.

Such Designs need to have access gates positioned at the, on view, front elevations. This gives appropriate access to a shared private alley way that then gives individual homes access into their gardens by a further gate. (no)



Without this simple measure you would allow opportunists access in a secluded area and crime usually follows as a consequence. **These security measures will need carefully incorporating across the entire final development as the construction takes place.**

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

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.

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.

This aligns with The National Planning Policy Framework Framework December 2024 which requires 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”.

If you should wish to discuss any of my comments, or require some assistance with Secured by Design principles, 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 the fear of crime, creating a safer more secure and sustainable environment for future Broads Authority residents.

Yours sincerely



Steve Gower
Designing Out Crime Officer
Norfolk Constabulary

cc Mr. Duncan Potter via e-mail.

