

Planning Officer: Howard Smith  
Planning Department  
Exeter City Council

Kris Calderhead  
Police Designing Out Crime Officer  
Exeter Police Station  
Sidmouth Road  
Exeter EX2 7RY

Date: 23/09/22

Dear Mr Smith,

***22/1145/FUL Haven Banks, Water Lane, Exeter, Devon, EX2 8BY. Comprehensive redevelopment to deliver a new, mixed use neighbourhood, comprising demolition of existing buildings and construction of four residential-led mixed-use buildings of 2 to 6 storeys, including retail, café/restaurant and flexible commercial units (Class E), residential (Class C3) and co-living (Sui Generis) accommodation, pedestrian square and public realm, amenity areas, landscaping, access, parking, servicing and associated works.***

Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this planning application.

I would like to make the following observations and recommendations for your consideration, including respectfully requesting that the planning conditions below are applied should the application progress.

### **Planning Conditions**

- Condition:** access to the rear of Block D, Block B and Block A to be restricted to residents and legitimate / service users only at both ends by use of appropriate gates and boundaries. Pedestrian gates should be robust i.e. steel bar gates to LPS 1175 SR2 or STS 202 BR2 with a minimum height of 1.8m, of anti-climb design, that allows for visibility through the gate with access control system (e.g. fob) with fail safe release on private side in case of fire installed and the locking mechanism shielded to prevent anyone reaching through to the inner lock release.  
**Reason:** such space at the rear of Block A and B is narrow and not well overlooked and if left open could attract misuse. The rear of Block D contains a lot of recesses and corners which hampers lines of sight. Visitors navigating through the development should be directed through the main link between Blocks D & C, a route via the rear of Block D is not needed.
- Condition:** 24-7 onsite management of the development is maintained indefinitely, as is the vetting of potential tenants of the co-living accommodation.  
**Reason:** In order to reduce the likelihood of crime, conflict, disorder and anti-social behaviour and to enhance the safety of residents of the scheme.
- Condition:** CCTV with a clear Operation Requirement to be distributed throughout the development.  
**Reason:** In order to help prevent/detect crime, disorder and anti-social behaviour.
- Condition:** Access control measures within residential blocks must be in place to prevent casual intrusion beyond public space and into private space, this includes no trades person access for mail delivery or utility readings.  
**Reason:** To prevent unlawful access to private/semi-private space and thus reduce the likelihood of crime, conflict, disorder and anti-social behaviour.

## **Further Recommendations & Observations**

Some of the comments below underpin my request for consideration of the conditions above.

### **Co-Living**

Co-living arrangements is a relatively new concept in the city and currently there are no such developments up and running to refer to in order to gauge the success / problems with them.

I note within the DAS that '*Co-living offers a platform for younger professional generations in particular, but not exclusively*'. From a policing perspective, if the development is available to anyone over the age of 18, this could lead to people with a wide mix of lifestyles, health needs, dependencies, safeguarding issues being housed together sharing communal space which could cause conflict. Therefore, details on what vetting will be conducted and how the site will be managed, including clear management policies and procedures will be crucial to its running.

The DAS also states that '*creating a professional, well connected, respectful community is key to successful communal living*'. Given the nature of Co-Living developments it seems likely that the resident population could be somewhat transient with potentially a high turnover of individuals. This can make creating a feeling of community somewhat challenging.

Shared amenity space is a key element of the Co-Living model, so detailing ways in which a sense of community and ownership can be created needs to be considered and demonstrated. If such a sense is not created, it leaves the development vulnerable as residents don't identify with communal space and become disassociated from them leading to an increase in crime and anti-social behaviour.<sup>1</sup>

### **Physical Protection**

External doors (including doors to cycle and bin stores which should have a locking system that is easily operable from the inner face by use of a thumb turn to ensure that residents are not accidentally locked in) and accessible windows are advised to be tested and certified to an appropriate nationally recognised security standard.

The security standard for external communal doorsets must be robust and secure enough to withstand its use in such an environment and be fitted with appropriate access control and door entry systems. Guidance can be sought in *Secured by Design Homes 2019* or I am happy to provide further detail if needed.

### **Mail Delivery**

Accommodation such as this must not have trades button access for mail delivery or utility readings. They have been proven to contribute to ASB, crime and unlawful access to communal developments.

A 'through-the-wall' mail delivery into secure internal letterboxes, boxes located within an 'airlock' access controlled entrance hall/lobby, whereby access can be gained by a postal worker through the outer door only or external letterboxes (certificated to TS009) should be considered.

If utility readings cannot be carried out remotely it would be preferable that they were located externally near the main entrance or in the 'airlock' space, thus again negating the need of a trades button.

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<sup>1</sup> *Creating Defensible Space* by Oscar Newman 1996

## **CCTV**

CCTV should be distributed throughout the development with clear Passport for Compliance Documents including an Operational Requirement, in place. Access controlled areas, both vehicular and pedestrian entry and exit points, bike and bin stores, circulation walkways etc. should be covered. It would be beneficial if onsite management / reception staff were able to actively monitor the CCTV onsite.

## **Lighting**

An effective lighting scheme is crucial to achieving a safe environment. For crime prevention measures, lighting should be provided by on building solutions or pole mounted luminaires if possible, with good levels of uniformity. Bollard lighting should be minimised and used for demarcation of routes only or supplementary as part of a general design.

Bin and cycle stores should be lit at night using vandal resistant light fittings and energy efficient LED lights.

It is important that the landscape architect, lighting engineer and CCTV installer coordinate their plans to avoid conflict between such features.

24-hour internal lighting (switched using a photoelectric cell) to communal parts of the development should be installed. This includes the communal entrance halls, landings, corridors, stairwells and all entrance/exit points. Consider lighting systems that reduce light levels during quieter periods to save energy.

## **Management and Maintenance**

As referenced above, the effective and robust management of the scheme is vital in creating a safe, secure environment and reducing the likelihood of crime and ASB at the development. Onsite management and security must be maintained indefinitely. Without it, given the location of the development and large communal space which could potentially become misused if not managed effectively, the risk of crime and anti-social behaviour would undoubtedly increase.

## **Access Control (Compartmentalisation)**

It is vital that access to the residential parts of the development is restricted to residents and that casual intrusion is prevented.

If communal areas, landings, stairwells, corridors etc. are compromised then they can attract ASB such as rough sleeping, drug use etc. particularly in a location in close vicinity to the city centre. Therefore, unlawful free movement throughout the residential blocks should be prevented with the use of an appropriate access control system, door entry system and compartmentalisation. This will hold potential intruders or burglars who may have tailgated through ground floor security measures so they cannot freely access the remainder of the block.

## **Structure**

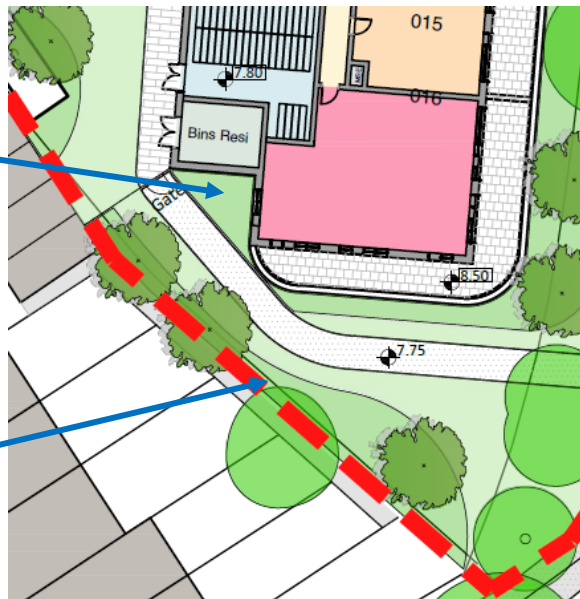
External seating areas for cafes / restaurants must be clearly defined to prevent conflict and vehicle mitigation measures must be in place to prevent conflict between pedestrians and vehicles.

Ensure that trees and planting do not hamper surveillance opportunities and that a 1m surveillance gap is maintained with planting no higher than 1m and tree branches no lower than 2m from the ground.

It would be preferable if the timber slatted benches allowed for single seating to prevent unwanted congregation, rough sleeping etc.

This space has potential to attract misuse and ASB. It is somewhat void and concealed. It would be preferable if it was removed or planting added to reduce the recessed space.

Ensure the boundaries of the rear gardens of the adjoining plots are afforded a suitable buffer (at least 1m high 1m wide thorny planting) to protect the plots for unauthorised access.



Yours sincerely

Kris Calderhead  
Designing Out Crime Officer