



**Kent
Police**

Protecting and serving the people of Kent

Sevenoaks District Council
Argyle Road
Sevenoaks
Kent
TN13 1HG

E-mail: alistair.hendry@kent.police.uk

Date: 16th July 2025

Ref: Pre-App/AH.1/SE-301

Location: Bradbourne Lakes, Lambarde Road, Sevenoaks TN13 3HU
Proposal: Redevelopment of land.

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend the applicant follows SBD guidance to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme;

1. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the Institution of Lighting Professionals), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. External lighting to conform to min standard of BS5489-1:2020.
2. Any current or new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas. In addition, we would recommend dense / prickly planting to ensure individuals stay on pedestrian routes, and do not create desire lines. or spaces where potential offenders can hide from view.
3. Public Footpaths should be at least 3 metres wide to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people.
4. If CCTV is proposed for this site, we advise this to cover the area outside the toilets. Please ensure the CCTV supports the lighting plan. To note, we advise against the use of dummy cameras as they provide a false sense of security.
5. We recommend the toilets to be situated near well-used paths and in an open area with maximal natural surveillance covering the facility. Safer Parks recommend the access point to the facility needs to be orientated so that they have good sightlines to and from a wide area around and, where appropriate, it should be easy for passers-by to see inside.

6. A timed lock could be considered for the toilet facility to prevent mis-use and criminal damage (as an example, the facility could be available for the general public to use between 9am-5pm during the summer time, 9am-3pm winter time)
7. We recommend lighting to cover the access point to the toilet facility to aid in natural surveillance.
8. For further advice on how to enhance safety and prevent anti-social behaviour within the green spaces, we recommend visiting Safer Parks website [Safer Parks for Women and Girls - Green Flag Award](#) and reviewing their Safer Parks guidance [safer-parks-final-050503.pdf](#)

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Yours sincerely,

DOCO.

Designing Out Crime Officer

Strategic Prevention Command