

Ms. Charlotte Galforg
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Via email to: charlottegalforg@southend.gov.uk



Mrs. Heather Gurden
Strategic Designing out Crime Manager
Essex Police HQ
Springfield, Chelmsford
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16th June 2021

Dear Ms. Galforg

Re: 17/00733/FULM SUFC Fossetts Farm, Southend – 21,000 seat football stadium and approximately 1,461 dwellings together with associated development

17/00733/FULM | Hybrid planning application for part full and part outline consent for phased development of relocation of Southend United Football Club comprising, Full Application for erection of 21,000 seat football stadium, comprising east, west, south and north stands, basement excavation, changing rooms, ticket office, club shop, food drink concessions, cafe/restaurant, temporary stadium works including, erect end stand cladding, press seats and workroom, directors seating and box, scoreboard and floodlights, stadium parking, new vehicular access from Fossetts Way, pedestrian access from Sutton Road and related ancillary works, stadium north stand, to include 107 bed hotel, conference floorspace and two residential corners to stadium of 3-6 additional storeys, 182 units, erect fan plaza residential building of 72 units, 3-6 storeys, ground floor unit(s) (use classes A1/D1/D2), parking, landscaping, access, related ancillary works, erect two residential buildings Fossetts Way north 42 units and south 51 units of 4-5 storeys and 3-6 storeys, car parking access, landscaping and ancillary works, erect two soccer domes, changing facilities, classroom, players hostel accommodation, parking and landscaping, Outline Application (with all matters reserved except means of access) for demolition of existing training centre and club house, erect buildings ranging in height from 1-9 storeys to provide a total of up to 118,000sqms (GIA) of residential floorspace (up to 1,114 units), other commercial floorspace of up to 1,609 sqms (use classes A1/A2/A3/D1/D2/B1) and up to 280 sqms (community use - sui generis) car parking, servicing, landscaping, new public realm, access from Eastern Avenue related ancillary works | Part Of Fossetts Farm, Playing Fields, Jones Memorial Recreation Grd And SUFC Training Grd Eastern Avenue Southend-On-Sea, Essex

Essex Police recognise the level of complexity and challenges the proposal offers, and view this as an opportunity for Southend to thrive and become a vibrant location for people to want to live and visit. 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.

The following response refers to the most recent documentation submitted to Southend Planning Department prior to 13th May 2021. The response refers to previous documentation between Essex Police and Southend Borough Council and references emails received from Southend Borough Council dated 2nd July 2021.

For any further technical detail, please refer to our previous letters dated 2nd February 2021 (*initial planning response*) and 28th April 2021 (*proposed planning conditions*).

Essex Police wish to acknowledge the opportunity for initial consultation with the Design Team and Partners back in February 2021 to discuss our initial concerns. Essex Police would wish to continue to liaise with the Design Team, to create an environment that delivers their key objectives in a way that mitigates crime.

In addition, we acknowledge that within the Planning Statement (dated 7th May) the inclusion of:

- Section 4.8.18 welcoming the necessity for continuing engagement with the Police and
- Section 3.47 (vi) welcoming the necessity to adhere to Secured by Design principles.

Match Day Concerns

Upon review of the most recent documentation, it is evident that preliminary Policing requirements have been considered from a Match Day perspective. However, many of the issues identified in our letter dated 28th April have failed to be addressed and therefore would require further detail and discussion regarding the event operation by the safety team. Such issues include:

- Within the email dated 2nd July there is reference that match day plans will be in agreement with the SAG and Safety Certificate for the new stadium. This could have reduced or zero capacity if the SAG are not satisfied with the match day plans regarding safety. Essex Police foresee these match day plans having to evolve through the phases of the overall development, as the stadium will be surrounded by on-going construction works.
- Essex Police agree with the observations made by Adrian Cole regarding the Memorial Park being used by supporters to reduce foot traffic in Sutton Road, however, would wish to discourage the use of the park area on match days due to the concerns raised regarding heightened ASB, Crime and Disorder.
- There has been no further feedback in relation to the North stand flats and residential developments match day management concerns. Essex Police acknowledge that Section 5.4.3 (Operational Issues) addresses that *'residents will need to be cognisant that they are living over a stadium'* and would wish for future liaison regarding the management of the residential environment on Match days.
- In line with the revised timelines for each construction phase, Essex Police require reassurance that the enabling works to the footpaths/road network around the development would be completed before the new stadium is open to supporters.
- Essex Police acknowledge within the Steer Planning comments the increase in Emergency Vehicle Provision.

Essex Police acknowledge that many of the issues addressed will require ratification at the Safety Advisory Group Meeting, and therefore early consultation is essential for the orchestration of match day plans especially as the development is gaining momentum.

It is important to note that whether there is a police presence or not, responsibility for the enforcement of ground regulations remains with the stadium management. Essex Police should not be overburdened to overcome inadequacies in safety management.

Roads Policing Input

Further to the email correspondence submitted 2nd July from Southend Borough Council on behalf of the developer, please see the below observations and the need for urgent consultation:

Essex Police Initial Response (Feb 2021)	Email Response (May 2021)	Essex Police Further Comment (June 2021)
As a potential solution, the Roads Policing Team believe that due consideration must be given to path widening on the foot path east of Sutton Road from Supporters Way to the junction with Eastern Avenue area surrounding the crossing to the	The Applicant is proposing to widen the western footway on Sutton Road within the available highway land to 3m to allow both pedestrian and cycle use from south of the Stock Road junction to East Street, which will also be widened. A signalised toucan crossing will be provided just south of Stock Road to direct supporters	<p>The response provided does not address the concerns raised.</p> <p>The proposal will see the main flow of pedestrian's cross, not once but, twice across the main flow of</p>

<p>east of the roundabout. This should continue from the south side of the crossing and down to the crossing south of the roundabout. Attached within the supplementary documentation illustrates this concern.</p>	<p>from the eastern Sutton Road footway to the western side, this will also be marshalled on matchdays. The widening of the eastern footway would require land take from the Jones Memorial Ground which is not within the gift of the applicant. Further, the pedestrian analysis presented within Table 8.16 of the submitted Transport Assessment demonstrates that there is sufficient overall footway width on Sutton Road to accommodate the peak 15-minute pedestrian demand generated by a full capacity match.</p>	<p>vehicular traffic during this peak 15-minute period.</p> <p>This appears to be unnecessary and strongly believe that alternatives should be explored with Southend Borough Council in respect of widening the eastern footway to avoid this.</p>
<p>While there are plans to enhance the bus services to and from the rail services detailed plans on road layout of Prittlewell Station will need to be made clear</p>	<p>It is envisaged that the majority of supporters would walk between Prittlewell station and the stadium. Nonetheless, consideration for shuttle bus pick-up and drop-off at or near the station will be developed as the shuttle bus routes are defined as part of the detailed Matchday Travel Management Strategy to be secured by planning condition.</p>	<p>The response in relation to supporters walking primarily from/ to Prittlewell Railway Station only strengthens Essex Police Roads Policing Teams concerns highlighted above in relation to this point placing a significant impact for the safety of all road users.</p>
<p>The development also stands to place an additional burden on Essex County Council roads by vehicle and by (especially if the correct measures are not put in place) the risk of pedestrians using Sutton Road toward the Anne Boleyn public house. Pedestrians using this route are required to use a single narrow footpath on the right-hand side of the road, which encounters the hazard of crossing the junction of Sutton Road with Shopland Road without any protective factors in place. This concern has been highlighted to Essex Highways.</p>	<p>Given the walking distances to the nearest settlements, 2.5km (30 minutes) to Sutton Court Drive and 3.2km (40 minutes) to Rochford, the propensity for supporters to walk this route is considered minimal. Any matchday vehicular traffic along this route would occur outside of the observed highway peak and would not exceed peak traffic conditions.</p>	<p>It is acknowledged that this risk is less likely to occur but whilst Essex Police have highlighted this as a concern to Essex Highways; what consultation has taken place to mitigate this?</p>
<p>Further consultation is required as to the level of consideration given to the impact on funerals on match days with both a cemetery and crematorium on the main route. The impact could be significant on both traffic flow but could lead to community tension.</p>		<p>This point has received no further comment and still remains a concern.</p>

Designing out Crime Concerns

From a Designing out Crime perspective, there are various elements that despite the early consultation, pose levels of concern. Essex Police would welcome ongoing consultation regarding the below observations:

The Stadium build:

- That the design of Stadium Way is structured in such a way as to not cause conflict, whilst promoting a sense of ownership. Similarly, the footpath needs to provide convenient movement without compromising security.
- Further details appertaining to the lighting plan and how the plan will address the Rochford Lighting Curfew of 10pm¹
- Whether any additional security measures are being considered for those residing within the academy building.
- The 85-parking space provision located within the basement.
- Consideration of the removal of the resident's locker storage facility within the basement area of the Stadium.
- Application of Security Industry Standards and Secured by Design schemes throughout, promoting a safe built environment across the differing requirements.

The Outline Residential Application:

- That the actuality and perception of crime is considered throughout the design, resulting in a design where crime is deemed a material consideration throughout.
- Mitigating risk through promoting a safe built environment through the various Secured by Design schemes across the differing requirements.
- In light of recent events and Home Office Safer Street Schemes, what measures have been proposed to mitigate any potential risk towards women and children.
- Footpath design and layout of housing in line with Stadium Way.
- Planting and Landscape design throughout the development.
- Public realm areas especially the Stadium Way.
- Cycle parking provision, bin stores and communal areas.
- Physical Security Measures (i.e. door hardware).
- Management and Maintenance policies and
- The allocation of 58 parking spaces for the Jones Memorial Ground within the development.

Further Queries

- Section 3.4 of the Design and Access Statement refers to the use of a 'cinema' and Essex Police would wish for further clarification appertaining to this detail.
- Section 4.8.28 refers to the use of Controlled Parking Zones and would wish to embed the management within the future policies and management structure.
- Additionally, Essex Police wish further clarity appertaining to the:
 - a. Location and design of the Control Room
 - b. Further detail regarding the segregation of fans
 - c. The proposals for 'Football operation for Players and fans' during the phased construction

¹ Paragraph 3.71 of the Planning Statement (dated 7th May 2021)

Proposed Conditions Status

In April 2021, Essex police submitted a list of conditions to Southend Borough Council for initial consideration, (a copy of the proposed Essex Police Conditions are available within Appendix A). Further to the submission of these conditions and in line with further correspondence, Essex Police have the following observations:

Mitigation Against Crime

Condition	Status	Essex Police Comment
Condition 1: Crime Impact Statement	No Further Details / Update Provided	<p>Appreciative that this may not require a specific condition, however, Essex Police would wish for written confirmation that the foreseeability of crime is considered (and constantly reviewed during the process and phased construction) as a material consideration throughout all aspects of the design.</p> <p>The Crime Impact Statement will need to consider the industrial business park (i.e. for HGV delivery and crime) and the high burglary hotspot within the surrounding area.</p>

Counter Terrorism Security Risks

Condition	Status	Essex Police Comment
Condition 2: VAW Mitigation	No Further Details / Update Provided	<p>Early consideration of means to mitigate potential terrorist activity is imperative, and therefore require liaison with the Counter Terrorism Security Advisor's regarding issues such as VAW mitigation and the design of Supporters Way.</p> <p>This will be in line with the proposed Home Office 'Protect Duty' (published February 21,) that states a legal requirement for Public Places to ensure preparedness for and protection of terrorist attacks.</p>

Strategic Match Day Operations

Condition	Status	Essex Police Comment
Condition 3: Segregating the stadium	Agreed	<p>Essex Police welcome ongoing engagement with the developers and Southend Borough Council appertaining to these matters.</p> <p>Additionally, Essex Police welcome the increase in Emergency Service Parking Provision.</p>
Condition 4: Control Room	Agreed	
Condition 5: Emergency parking provision	Agreed	
Condition 6: Further consultation	Agreed	

Roads Policing Concerns

Condition	Status	Essex Police Comment
Condition 7: Further consultation to ensure Safety for all road users	Further Clarity is required	<p>Essex Police Roads Policing would wish for this condition to remain in situ as the supporting evidence does not ensure that the safety of all road users are considered.</p> <p>Further email response (containing the Steer Comments) requests removing this condition due to the Road Safety Audit, however within the Planning Statement (Sec 4.8.18) it states the need for continuing engagement with the Police.</p> <p>Essex Police would wish for further re-examination and consultation regarding to all matters appertaining to highways and transport.</p>
Condition 8: Parking Provision	Agreed	Essex Police welcome this inclusion.
Condition 9: Park Mark	Agreed	Essex Police welcome this inclusion.

Communications Strategy

Condition	Status	Essex Police Comment
Condition 10: Airwave Signal	No Further Details / Update Provided	Essex Police acknowledge the complexity of the request and would welcome discussions to ensure that the built environment doesn't hinder emergency services communication strategies.

Phased Construction Considerations

Condition	Status	Essex Police Comment
Condition 11: Collaborative Approach	No Further Details / Update Provided	Due to the complexity of the build and the cumulative effect of the proposed development in combination with other committed developments within the surrounding area, Essex Police would welcome conversations to ensure that crime is mitigated during the construction phase.

Lighting of the Development

Condition	Status	Essex Police Comment
Condition 12: Lighting Consultant	To date, No Further Comment has been received appertaining to the various aspects of the lighting provision.	Respectful that the matters relating to the lighting of the development will be addressed within the detailed matters, however, Essex Police would recommend early consideration of the impact of the lighting provision to mitigate against crime whilst balancing local lighting needs.
Condition 13: Lighting Impact Assessment		
Condition 14: DOCO Input		
Condition 15: Application lighting standards		
Condition 16: Central Management System adoption		
Condition 17: SBD lighting Designer		

Please note that due to the anticipated complexities arising from the design, Essex Police would recommend Southend Council appoint an independent competent lighting specialist to support the council with reviewing and assessing the documentation. This is due to the legal responsibility of that design lies with whomever signs the documentation off.

Design of the Stadium

Condition	Status	Essex Police Comment
Condition 18: Stadium Way Access and implementation of Standards	No Further Details / Update Provided	Stadium Way poses several concerns from a policing perspective and would request consultation.
Condition 19: Removal of the storage facilities	No Further Details / Update Provided	It is apparent that aligned to the most recent drawings, plans to remove the storage facilities seem to be discounted. Due to the level of proposed risk, Essex Police would request re-consideration of removing this facility.

Physical Security of the Stadium

Condition	Status	Essex Police Comment
Condition 20: Doorset Specification	No Further Details / Update Provided	At the design stage, the Essex Police DOCO and CTSA's require engagement regarding the doorsets specification.
Condition 21: Glazing Specification	No Further Details / Update Provided	At the design stage, the Essex Police DOCO and CTSA's require engagement regarding the Glazing Specification.
Condition 22: SBD - Silver	No Further Details / Update Provided	Essex Police DOCO seek clarification whether the residential properties will be accredited to Secured by Design.
Condition 23: SBD Preferred Specification	No Further Details / Update Provided	Essex Police would welcome discussion appertaining to the SBD Police Preferred Specification. This will align with any SBD accreditation obtaining.

Physical Security of the Stadium

Condition	Status	Essex Police Comment
Condition 24: SBD Commercial	No Further Details / Update Provided	Essex Police DOCO seek clarification whether the commercial properties will be accredited to Secured by Design.

CCTV

Condition	Status	Essex Police Comment
Condition 25: CCTV liaison	No Further Details / Update Provided	The most important aspect of utilising CCTV is the quality of the system and its imagery. This should be based on a series of comprehensive operational user and requirement tables. Essex Police would wish clarification that these processes will be in place.

Public Realm Space

Condition	Status	Essex Police Comment
Condition 26: Landscape Provision	No Further Details / Update Provided	Require acknowledgement that the development team will liaise with Essex Police with regard to the landscape provision and impact on CCTV.

Physical Security of the Residential Quarters

Condition	Status	Essex Police Comment
Condition 27: Pas 24 / STS 202	No Further Details / Update Provided	Acknowledging that this level of detail will be available at the reserve matters stage, Essex Police seek acknowledgement that the development will adhere to these security standards and concepts.
Condition 28: Dual Certification		
Condition 29: Compartmentalisation		

Outline Application

Condition	Status	Essex Police Comment
Condition 30: DOCO Engagement	No Further Details / Update Provided	<p>Essex Police acknowledge that the residential area South of the stadium is currently at the Masterplan stage. An integrated approach to crime prevention at an early stage is necessary to all significant components of its design, planning and layout.</p> <p>Therefore, would request urgent liaison asap regarding this proposal. This is aligned to the meeting with the development team in February 2021 where the opportunity to discuss the plans was proposed but not forthcoming.</p>
Condition 31: SBD Silver accreditation	No Further Details / Update Provided	Essex Police DOCO seek clarification whether the residential properties will be accredited to Secured by Design.

Policy and Procedures

Condition	Status	Essex Police Comment
Condition 32: Management Plan	No Further Details / Update Provided	Appreciative that this will be embedded within the reserved matters, early consideration of management and maintenance plans will be pivotal to the successful operation of the development. This will align with the Match Day operation plans and usage of the Community Facilities.
Condition 33: Secured Environments	No Further Details / Update Provided	Essex Police would welcome further discussions regarding the proposal of inclusion of Secured Environments accreditation.

Developer Contributions

Condition	Status	Essex Police Comment
Condition 34: Seeking contributions	No Further Details / Update Provided	Essex Police will pursue developer contributions for the scheme, (<i>in line with Sec 4.15 – CIL and S106 of the Planning Statement</i>) in order to deliver the same level of service to residents of the new development

		(as a whole), as for the existing residents, without compromising front line services.
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Essex Police would request ongoing constructive dialogue with Southend Borough Council, Essex Highways, and the Developers, to broker the viability of the scheme and obtain the necessary clarity requested.

If you have any further comments regarding any of the above, please do not hesitate to email designingoutcrime@essex.police.uk.

Many thanks



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Strategic Designing Out Crime Officer (*SDOCO*)

HQ Local Policing Support Unit

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Appendix A: Proposed conditions

Further to our letter dated 28th April 2021, please see the below conditions proposed by Essex Police relating to the SUFC development.

Mitigation against crime

Condition 1: The creation of a 'Crime Impact Statement' that reflects the 'Security Needs Assessment' of the development. By demonstrating an awareness of security issues, the management and staff at a sports ground can make a positive contribution towards the provision of a safe experience.

Counter Terrorism Security Risks

Condition 2: The use of physical measures to mitigate against a VAW attack must be considered during the initial planning phase rather than retrospectively (which is the most expensive and disruptive route). Counter Terrorist Security Advisors (CTSA) have extensive experience in this field and therefore must be part of the discussion.

Strategic Match Day Operations

Condition 3: Liaison with the Police regarding the proposals to segregate the stadium (i.e. fencing / partitions) and approach to stadium for high risk fixtures.

Condition 4: Discussion and detail is required on the design and specification of the Control Room to meet emergency services requirements for match days/events and Match day operation manuals.

Condition 5: Designing in Emergency service parking provision for 5 vehicles (minimum of three long wheel-based transit vehicles and 2 additional police cars for high risk fixtures).

Condition 6: Further consultation and liaison with the Dedicated Football Officer and Operational Policing Command to discuss Match day events to mitigate any identified risk.

Road layout and supporting infrastructure

Condition 7: The proposal will place a significant impact for the safety of all road users, and therefore Essex Police require further engagement, with the need to reconsider the proposed road provision. Further consultation with the Essex Police Roads Policing Team will be imperative.

Condition 8: Liaison with Essex Police Roads Policing Team regarding vehicle Parking, including provision, management, and structure. Further clarification is required, regarding the measures in place to minimise the impact on the local community.

Condition 9: For all car park facilities (including residential) to adopt and be accredited to the 'British Parking Association – Park Mark Scheme'. Park Mark is a national standard for vehicle parking and will ensure that measures are in place to safeguard the public and their vehicles.

Communication Strategy

Condition 10: Due to the enormity of the proposal and the significant impact on Policing, it is imperative that sufficient Police Airwaves signal is achievable across all areas (including basement parking etc) of the development, with the expectation that any subsidiary equipment is funded by the developer. Essex Police in company with the

Home Office, require further consultation and discussion appertaining to the proposals for the seamless delivery of airwave signal.

Phased Construction Considerations

Condition 11: Considering the scale of the proposed phased development, Essex Police recommend that crime is deemed a material consideration throughout all aspects of during the construction process. Essex Police would request adoption of a collaborative approach with the developer throughout the construction.

Lighting of the Development

Condition 12: The early appointment of an accredited competent lighting consultant that is qualified in the various lighting engineering skills such as street lighting, emergency lighting, interior lighting etc.

Condition 13: Creation of a Lighting Impact Assessment and Statement. This is required to prove the lighting model and identify the potential impact on the surroundings and local infrastructure. This will require consideration of the needs on Match Day and non-match days for visitors and residents.

Condition 14: Essex Police would encourage discussions with the DOCO to ensure that the lighting and landscape align and that the proposed lighting measures have minimal impact on CCTV quality.

Condition 15: For planning review, Essex Police would recommend that within the Lighting Impact Assessment evidence is supplied to appertain the necessary lighting standards.

Condition 16: Essex Police would advocate adopting the latest technological breakthroughs within the lighting design and consideration given to adopting CMS within lighting schemes.

Condition 17: To mitigate the risk (when approving lighting plans from a Planning Perspective) consideration of appointing a competent SBD approved lighting designer to provide an in-depth review of the complexed lighting plans.

Design of the Stadium

Condition 18: Essex Police require that upon the detailed design stage, the developers and architects communicate with the Designing out crime team regarding; 1) the design of Stadium Way, 2) access and egress measures and 3) the security standards and utilising the most effective standard for force entry (such as appropriate LPS 1175 standard).

Condition 19: Due to the heightened risk, Essex Police request the removal of the storage facilities located within the basement.

Physical Security of the Stadium

Condition 20: Essex Police DOCO and CTSA's would request further consultation at the detail design stage regarding the doorsets within the stadium. Aligned to the 'Crime Impact Assessment' this will determine the appropriate specification of doorsets, and level of attack resistance required.

Condition 21: Essex Police DOCO and CTSA's request further consultation at the detail design stage appertaining to the glazing specification within all windows and balconies/canopies.

This will vary in accordance to use (i.e. located within the stadium and residential quarters).

Condition 22: Essex Police require that all new homes are conditioned to achieve a minimum of Secured by Design Silver accreditation (with the expectation of achieving Gold) in line with the current guidance. (Please note that this is subject to change upon the PCPI revisions of the national documents).

Condition 23: Application of industry security standard and utilise tested and certified products (through SBD's Preferred specification) throughout the entirety of the development to ensure sustainability and carbon reduction agendas.

Commercial units within the Stadium Plaza

Condition 24: Essex Police require all new retail provision to achieve SBD Commercial in line with the current guidance, (please note that this is subject to change upon the PCPI revisions of the national documents).

CCTV coverage

Condition 25: The use of CCTV across the stadium and the entirety of the development is imperative, and Essex Police would require liaison regarding the proposals.

Public Realm Space

Condition 26: Detailed Landscape plans to consider the potential for crime and the impact they play on critical security features such as lighting and CCTV. It is imperative that the landscape provision is supported by detailed maintenance and management programmes to ensure that the landscape fulfils the original design.

Physical Security of the Residential quarters

Condition 27: In support with ADQ, all doorsets to be STS 202 or PAS 24 certified (as a minimum standard).

Condition 28: Essex Police require all doors (leading to residential units) to achieve dual certification through the relevant independent third-party bodies.

Condition 29: Essex Police require consideration of the access, egress and movement throughout the residential quarters and where appropriate compartmentalisation measures in place to prevent unauthorised intrusion and ASB.

Outline Application

Condition 30: To address the concerns regarding the outline proposal, for the design team to engage with the Designing out Crime Team.

Condition 31: Essex Police would wish for all new homes and residents within the proposed development to achieve (a minimum) SBD Silver accreditation. (Please note that this is subject to change upon the PCPI revisions of the national documents).

Policy and Procedures

Condition 32: Liaison with Essex Police DOCO appertaining the management plan or guidance operation plan for the development as whole (inclusive of residential quarters).

Condition 33: Consideration of accreditation to PCPI 'Secured Environments'. Secured Environments is a Police certification scheme that is focused on risk management and identifies measures to rectify concerns.

Developer Contributions

Condition 34: Subject to negotiation, Essex Police will be seeking to secure contributions that are compliant with the test under Regulation 122.