

Mrs Tina Pickup,
Planning Services
Havant Borough Council,
Public Service Plaza,
Civic Centre Road,
Havant,
PO9 2AX

Email harry.greenhalgh@cushwake.com
Direct +44(0)113 233 7481
Mobile +44(0) 7769363216

Your Ref:
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Our Ref:

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Dear Mrs Pickup,

I write to you regarding the application APP/22/00499 to vary Condition 8 of Planning Permission 94/55269/002 to allow for the increase in capacity from 22 to 25. Since the application has been validated there has been a number of representations objecting to the increase of capacity at The Grange Approved Premise, The Grange hereafter. The objections from local residents are primarily based upon a fear of crime which is based upon antisocial behaviour in the area allegedly caused by the residents of The Grange.

The Ministry of Justice (MoJ) is a major government department, at the heart of the justice system. The responsibility for both Prisons and Probation sits within one of MoJ's agencies; Her Majesty's Prison and Probation Service (HMPPS).

The application to vary the condition, to allow for the increase in residents is to support the HMPPS strategy, a national expansion programme for Approved Premises (APs) has been devised. APs are a critical part of the department's commitment, through the Probation Service, to ensure public protection by providing secure accommodation in the community and meeting the agency's commitment to reduce reoffending by supporting residents with resettlement planning in the community, including securing employment. The aim is to better meet demand for AP bed spaces to support the management of men and women who reside in these facilities. This programme was announced in a ministerial commitment made on 24th January 2019 "building over 200 additional places in approved premises".

APs provide accommodation in the community for convicted prisoners upon release under licence. They provide an enhanced level of supervision to reduce the risk of harm to the public and to maximise the opportunities for successful rehabilitation. They are staffed 24 hours a day, seven days a week, 365 days a year. With a fully trained and experienced staff team from the Probation Service (PS) whose role is to manage the reintroduction of offenders into the community, reducing re-offending and managing risk. Each AP provides enhanced residential supervision by:

- Working closely with PS offender managers
- Providing 24hr staff oversight
- Monitoring curfews and ensuring compliance with rigorously enforced rules
- Undertaking ongoing observation and assessment of attitudes and behaviour
- Providing programmes of regular supervision, support and monitoring aimed at reducing offending behaviour and risk to the public

AP residence places considerable expectations on offenders compared with living in private accommodation. There is greater monitoring than in other forms of accommodation and offenders will be in constant contact with members of staff who can record their behaviour and report matters of concern. An overnight curfew (11.00pm – 0600am) must be observed.

All residents must have an individual programme of purposeful activity, designed by the offender manager. All APs offer some services in-house and have access to services run by other parts of the PS and other organisations. The balance of in-house and external provision varies from AP to AP.

Procedures are in place whereby residents considered to be having a negative impact on the community will have their place withdrawn.

A 2017 report by HM Inspectorate of Probation¹ found that Approved Premises are *'exceptionally good at protecting the public, and the public confidence that risks are being managed well overall, with individuals returned to prison when it is right to do so'*.

The Grange is a long-established AP, 28 years, and is managed in line with PS guidelines to manage and support offenders and their reintroduction back into society to lead to better outcomes. As with all APs, the staff work closely with the local police to share intelligence about any suspected or observed anti-social behaviour. Whilst recent neighbourhood engagement has been impacted by Covid, The Grange does facilitate opportunities for local residents to attend the AP and meet with the staff. The Grange has developed and maintains good working relationships with the local neighbourhood police team and have a track record of responding quickly and appropriately to any complaints raised. A recent example was how the AP Team worked alongside the Neighbourhood Police to address a complaint from a neighbour unhappy at the behaviour of a local group of males who congregated in a car near to the AP grounds. The Grange has effective procedures to manage residents under tighter restrictions, should this be required, through a personal improvement plan. Residents are held to account for their behaviour whilst living at The Grange and the AP has the authority to recall a resident to Prison should they not comply.

Many of the concerns of local residents appear to relate to ongoing issues of anti-social behaviour although there is no firm evidence that the incidents relate to residents of the AP. However it is clear that there is a perception among local residents that there is ongoing anti-social behaviour in the area and a perceived fear of crime as a result of the AP. These concerns will remain whether or not the development is permitted, and this perception will not change in any meaningful way with the modest increase of three residents.

APs play an important role in providing temporary accommodation for prisoners released under licence, providing a secure and structured setting for residents to reintegrate with a community including finding work or training opportunities and permanent housing. We consider these to be material considerations in the determination of this application that outweigh any possible negative impact and should be given significant weight in the determination of this application.

Finally, whilst we acknowledge the objections relating to "fear of crime" and would like to draw your attention to a recent successful appeal (APP/T0355/W/21/3288610) for the increase in capacity of Manor Lodge AP in Windsor from 25 to 28. This application had been refused by Members' at planning committee due to residents' fear of crime, despite an Officer recommendation to grant planning permission. The Inspector held that the AP had a long-established use on site and the perception of antisocial

¹ Probation Hostels (Approved Premises) Contribution to Public Protection, Rehabilitation and Resettlement (July 2017)

behaviour attributed to the residents was long established. Therefore, the modest increase of three residents was unlikely to alter the residents' perception regardless of the development being permitted.

We trust that this provides additional insight into APs in respect to their purpose, how they are managed and the benefits of this specialist form of housing. If you have any queries, please do not hesitate to contact me.

Yours sincerely



Harry Greenhalgh

Planning Consultant, Planning
Development & Strategic Advisory

Cushman & Wakefield Debenham Tie Leung Limited