

REF: 23/02471/F

Location: OS Parcel 0622 South Of Jersey Cottages And
East Of Heyford Road Kirtlington

13 October 2023

Objection

Dear Jeanette,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area. I have fundamental concerns with the proposals in terms of the potential for crime and disorder, and for that reason I am unable to support this application. Unfortunately I cannot see a way for my objection to be addressed without significant redesign of the scheme. I recommend this application be refused as the current proposals do not meet the requirements of;

- The National Planning Policy Framework 2023 paragraph 92(b); which states 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 National Planning Policy Framework 2023, paragraph 130(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".
- The Cherwell Local Plan 2011-2031 sections A.22, B.265 and C.126

In addition, I do not feel the Design and Access Statement (DAS) adequately addresses crime and disorder as required by CABE's 'Design & Access Statements- How to write, read and use them'. This states that a DAS' should; 'Demonstrate how development can create accessible and safe environments, including addressing crime and disorder and fear of crime'. Whilst the DAS states safety and security is considered with active frontage, this does not permeate through to the plans provided. I recommend that the applicants provide an addendum to the DAS that comprehensively addresses crime and disorder, incorporating the principles of Crime Prevention through Environmental Design (CPTED) prior to approval. This document should demonstrate a commitment to achieving accreditation under the police's Secured by Design (SBD) scheme. Details can be found at; <https://www.securedbydesign.com/guidance/design-guides>

In order to ensure all opportunities are taken to design out crime from the outset, and to ensure all areas of the development are sufficiently secured to reduce the opportunities for crime and disorder to occur, I ask that the following or similarly worded condition be placed upon any approval;

Condition 1:

Prior to commencement of development, an application shall be made for Secured by Design accreditation on the development hereby approved. The development shall be carried out in accordance with the approved details, and shall not be occupied or used until confirmation of SBD accreditation has been received by the authority.

Condition 2:

Prior to commencement of development, details of a proposed external lighting scheme shall be submitted to the local planning authority. The scheme shall set out the steps that will be taken to ensure that external lighting, including zonal/security lighting and column lighting within parking courts promotes a secure environment and does not cause a nuisance to local residents.

Development layout – Reason for objection

I have fundamental concerns with the proposed layout of this development, where almost every dwelling is at greatly elevated risk of high impact crime such as burglary, due to having all vulnerable boundaries exposed and easily accessible whilst lacking surveillance. Particularly to the south, the road leading through the development between plots 9-14 is completely devoid of surveillance, whilst rear access and parking is completely exposed. This layout will be highly attractive to opportunistic and more organised crime, where offenders will be able to operate without fear of being seen or caught. The very excessively permeable layout of this development provides ample opportunities to escape, with multiple options for and offender.

The side or rear boundary is the entry point for the vast majority of residential burglaries, and therefore must be well protected. This is usually achieved by enclosing gardens and side/rear boundaries within a secure perimeter block, or by preventing access to rear gardens by providing active frontage along the street with houses facing onto the road. Where exposed boundaries are unavoidable, they must be well overlooked by active frontage and surveillance from dwellings directly adjacent.

I am unable to recommend remediation to this concern, as complete redesign is the only solution I can envisage.

Surveillance – Reason for objection

- As mentioned above, the south of the development in particular is very vulnerable to crime due to the street being completely devoid of any surveillance at ground floor level.
- Corner plots have blank gable ends, removing important surveillance opportunities across the development.
- The footpath to the east around plot 9 is very vulnerable to crime and ASB due to being enclosed behind a wall lacking surveillance. Plot 9 is exceptionally vulnerable due to this lack of surveillance.

It is vital that public areas are well overlooked by natural surveillance from surrounding dwellings, and active frontage to all streets and to neighbouring open spaces should be a key aim in all developments. Surveillance should be provided at ground floor level from active rooms within dwellings, which include Living rooms and kitchens, which are most likely to be occupied throughout the day. Blank gable ends that face the public realm must be avoided, as they can be attractive to crime and antisocial behaviour.

Corner plots must be exploited to maximise surveillance over the public realm, with dual aspect windows from active rooms (kitchens or living rooms) added to “turn the corner”. They should be orientated to maximise the surveillance opportunities they provide.

I am unable to recommend remediation to this concern, as complete redesign is the only solution I can envisage.

Defensible Space

- Plot 6 is vulnerable to crime and concealed entry attempts due to the open accessible space alongside the private boundary whilst lacking surveillance.
- Exposed private boundaries across the scheme lack surveillance and protection.
- Plot 9 is at greatly elevated risk with vulnerable boundaries lacking protection.

There should be clear definition between the public and private realm. Where the public or semi-private realm adjoins private areas of the development, defensible space and planting to a depth of at least 1m should be provided. This will provide an area of ‘stand-off’, marking the change of ownership and therefore the acceptable activity that is associated with it, protecting the privacy and security of occupants whilst reducing the potential for neighbourhood disputes. This is particularly important where parking areas or public spaces abut vulnerable side or rear residential boundaries. Side and rear boundaries are the entry

point for the majority of residential burglaries, and should be secured within a secure perimeter block wherever possible to prevent easy access. Consideration should be given to specifying thorny species where defensible planting is required to provide additional physical protection to boundaries.

Parking

Wherever possible, in curtilage parking is preferred. In any case, a parking space must be covered by active surveillance from the dwelling that it serves, providing parked vehicles with a capable and appropriate guardian. Windows should be included at ground floor level in elevations overlooking parking to maximise surveillance opportunities over parked vehicles and garages. Locating parking to the rear boundary of the plot should be avoided, as it restricts the opportunities for surveillance and leaves vehicles vulnerable to crime. Visitor parking must be located where it is well overlooked by active surveillance.

Cycle storage

I am unable to locate details of secure cycle storage for each plot across this development. Garages should be of sufficient dimensions to house both a vehicle and sufficient cycle storage for the size of the plot. Where a garage is not provided, secure enclosed cycle storage should be provided in the garden for the plot, with secure rear access provided also.

Rear access routes

I am unable to identify garden gate locations on plans provided. All rear access routes must be secured to the front of the building line, and secured with a robust key operated lock operable from both sides. No recesses should be present.

Public Open Space

POS to the east significantly lacks surveillance, and will be very vulnerable to crime and ASB. It may also be vulnerable to unauthorised encampments where it is accessible from the highway. Areas of POS/play should be designed and located to incorporate a high level of natural surveillance from neighbouring dwellings. The occupants of these dwellings could act as capable guardians to play areas, but need to be able to observe the area from active rooms in the dwellings to do so effectively. Clear stem trees (clear to 2m), and hedging maintained below 1m should be used in the planting to facilitate clear sightlines. Areas of green space adjoining the highway must also have sufficient landscaping and/or design features to prevent unauthorised vehicle incursion, to protect them from unauthorised encampments.

Excessive permeability – Reason for objection

Footpaths around the development, completely encircling several dwellings, create significant excessive permeability which will be highly beneficial to offenders committing crime or ASB.

I am unable to recommend remediation to this concern, as complete redesign is the only solution I can envisage. Excessive permeability introduces anonymity, making it difficult for residents to identify and challenge who should or shouldn't be there. Residential areas should primarily be formed of secure perimeter blocks, which protects the vulnerable side and rear boundaries of properties. Clear and direct routes through developments are important, but they should not undermine the defensible space of neighbourhoods:

Maximising Legitimate Activity - Perhaps the most important factor is that footpaths should have a high level of legitimate usage, deterring those intent on crime and anti-social behaviour with the risk of being observed or challenged. To ensure pathways become well used, they must lead to places people need to go, preventing desire lines through the development likely to undermine private space. They should promote a feeling of being a 'safe route' encouraging their usage further. Providing an excessive number of footpaths through developments dilutes activity and usage levels, leaving them vulnerable to crime and anti-social behaviour and providing a network of escape routes for an offender.

Maximising Surveillance - To help deter those intent on crime and anti-social behaviour footpaths should in general terms be as straight and as wide as possible, maximising surveillance along the route and allowing people to pass with ease. Landscaping should support clear sightlines and take into consideration surveillance from the residential dwellings (incorporating visibility from active rooms) to the public realm and vice versa.

Identifying Primary Routes – It is important that primary pedestrian routes required to navigate the site on a day to day basis are identified. These must be located where sufficient surveillance and lighting can support them to deter crime and anti-social behaviour and provide the user with a sense of security. Those located where lighting or surveillance will be restricted due to ecology and landscaping requirements should be avoidable if the user wishes.

Cycle routes

The principles in terms of the footpaths and pedestrian access should also be applied to cycle ways. Providing dual purpose routes (pedestrian/cyclist) would be beneficial in attracting higher levels of legitimate activity and casual surveillance and should be promoted.

Lighting

Lighting throughout the development should meet the general standards of BS5489-1:2020. Lighting plans should be provided which should set out how this standard will be achieved not only on adopted highways, but also un-adopted roads and parking courts. Note above, parking court lighting should be included within the plan, and be fed from the main highway. Bollard lighting is not an appropriate lighting method, and should be avoided. Not only can they be damaged by reversing vehicles, more critically they do not provide sufficient light at the right height to aid facial recognition and reduce the fear of crime. It also does not deter crime and antisocial behaviour.

Utility Meters

Unless smart meters are specified, private utility meters must be located where they are easily accessible and visible from the public realm. They must not be located behind a secure boundary or within the rear garden or rear access routes. Locating the boxes in private areas creates a risk of distraction burglary for occupants, particularly elderly or vulnerable residents. Utility boxes must not be deliberately hidden, as this gives a burglar or criminal a legitimate excuse of “trying to find the meter to read it”, whilst being in private spaces

The above comments are made on behalf of Thames Valley Police and relate to crime prevention design only. I hope that you find these comments of assistance. If you have any queries relating to crime prevention design, please do not hesitate to contact myself.

Kind regards
Kevin Cox.