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REF: 21/02339/REM

**Location: Proposed Himley Village North West Bicester
Middleton Stoney Road Bicester**

27 August 2021

Dear Caroline,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area, and visited the site. I have fundamental concerns with the current proposals, particularly relating to surveillance, vulnerable boundaries and car parking, and for this reason Thames Valley Police objects to this application in its current form. I make the following comments to ensure that the forthcoming application meets the requirements of;

- The National Planning Policy Framework 2020 paragraph 91(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 2020, paragraph 127(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'.
- HMCLG's Planning Practice Guidance on 'Design', which states that; 'Although design is only part of the planning process it can affect a range of objectives... Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered: safe, connected and efficient streets... crime prevention... security measures... cohesive & vibrant neighbourhoods.'
- Section 17 of the Crime and Disorder Act which states that "*all relevant authorities – which includes town and parish councils – have a duty to consider the impact of all their functions and decisions on crime and disorder in their local area.*"

In addition, I feel that the Design and Access Statement (DAS) does not adequately address crime and disorder as required by CABE's 'Design & Access Statements- How to write, read and use them'. This states that DAS' should; 'Demonstrate how development can create accessible and safe environments, including addressing crime and disorder and fear of crime'. 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 any outline 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>

To address the potential for crime and antisocial behaviour, and the strong objection from Thames Valley Police, the preceding lengthy list of issues and concerns must be addressed.

If this planning application is successful, I ask that the following conditions be placed on the applicant:
Condition 1

Prior to commencement of development above slab level, 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.

To ensure that appropriate physical security is provided in the built environment; To safeguard future residents and the buildings themselves from crime and antisocial behaviour.

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. The lighting scheme shall also be designed to avoid harm protected species.

To aid the applicant; (It will be critical that the parking courts include column lighting - lighting in parking court areas is usually a contentious issue as question around who pays for the power usually arise, therefore these column lights will need to be fed from the adopted highway. Bollard lighting 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.

Finally, I strongly recommend the applicant consults Thames Valley Police at their earliest opportunity to ensure that every opportunity is taken to design out crime.

Mews Courts

I have fundamental concerns with the proposed layout and parking arrangements for the Mews Courts along the primary road.

Parking courts should be avoided as they can attract those intent on crime and antisocial behaviour. They are generally poorly lit, with a lack of surveillance, providing access to vulnerable side and rear boundaries, which is the point of entry for the majority of burglaries. Parking courts are often abandoned by residents (especially after incidents have occurred) in favour of parking in front of dwellings where people can see and actually want to park their vehicles, leading to conflict between neighbours, parking on footways and access problems. Recessed areas and a lack of surveillance within rear court parking creates an ideal gathering location for non-residents to meet whilst providing a legitimate excuse to be there.

This proposal includes very excessive use of rear parking courts, which are completely un-overlooked and is a fundamental concern and reason for objection.

- The parking courts are located behind rear gardens, leaving an excessive amount of rear boundaries exposed to the public realm whilst not covered by surveillance, leaving these dwellings very vulnerable to burglary.
- There is a lack of defensive space between the parking courts and the abutting rear gardens
- Many plots have three sides exposed to the public realm, making them very vulnerable to burglary.
- The parking courts appear to be unlit, increasing the fear of crime.
- All parking spaces are vulnerable to crime, as they are hidden from sight of the owner and have no passing surveillance.
- It is unclear whether the mews courts are public or private space – particularly the arrangement behind plots 391-399, whilst this should be an enclosed private parking area it is open and permeable from both ends creating a desire line through the private parking area.
- There are very excessive unbroken lengths of 1.8m close boarded fence, which do not provide any surveillance over the parking courts. Further, they provide a large area of unattractive blank frontage which will be very attractive to crime and antisocial behaviour.
- There is excessive permeability around and through blocks such as plots 496-500. Excessive permeability reduces ownership and provides anonymity, supporting criminality and preventing capable guardians from challenging those that should not be there.

- There are blank gable ends overlooking parking/public realm – plot 3 for example.
- Rear elevations of garages overlooking the primary street – Whilst a window has been placed in this elevation, a garage is not an inhabited building and does not provide active frontage.
- There is no defensible space to some side and rear boundaries abutting the public realm

Recommendation

The only way I believe my concerns can be addressed is for this part of the development to be completely redesigned to remove the rear parking courts. Alternatively, all mews courts must be robustly secured with electronic, fob activated gates that are designed to be visually permeable but prevent unauthorised vehicle and pedestrian access. These gates should be of a Secured by Design approved specification.

Unallocated Parking

- The potential risk of crime and anti-social behaviour occurring in terms of the courtyard parking is further exacerbated with the proposed unallocated parking. Unallocated parking makes it difficult for future residents to identify and challenge the presence of an offender or suspicious activity and is inappropriate in a private parking court located behind the secure line of the front fascia of the building with limited surveillance and access to vulnerable boundaries.
- There is a large amount of unallocated visitor parking grouped along the secondary route opposite plots 22, 463 and 195. These spaces are not covered by sufficient surveillance, leaving vehicles parked here and their occupants very vulnerable to crime. The grouping of visitors vehicles also makes this area very attractive to a criminal, as a large number of vehicles could be targeted in a small amount of space and time, minimising the chance of being challenged or caught.

Recommendation

All visitor parking should be positioned in public locations with sufficient surveillance from surrounding dwellings. Visitor parking should be spread out throughout the development, and not clustered in large groups. Only allocated parking should be provided in the private courtyard areas allowing future resident to identify what cars and persons should or should not be there. If unallocated parking is to remain then parking courts should be robustly secured with an electronic fob activated vehicle gate and associated pedestrian gate providing robust physical security.

Surveillance

As mentioned previously in the Mews Courts, surveillance is a fundamental concern across this development. I do not believe the design and layout of this development exploits the surveillance potential that could reduce the risk of criminal activity in the future. This is particularly problematic where blank elevations overlook parking bays or parking courts.

- From floor plans and elevations provided, it appears that there are blank gable ends overlooking public space and car parking throughout this development. Blank elevations assist those intent on crime and antisocial behaviour as they reduce surveillance and provide a place for loitering, graffiti and other antisocial/criminal behaviour. It should be noted that a ground or first floor window formed of obscured glass is not sufficient to address a blank gable end.
- There are corner turning plots throughout the development which lack windows overlooking the public realm from ground floor active rooms. These plots must be provided with sufficient windows, and orientated to maximise surveillance over the surrounding public space.
- There is an area of ambiguous space to the side of plot 250, next to car parking. It is unclear what activity is expected in this space, or who is intended to use it. Without a clear function or ownership, this space could become attractive to crime and antisocial behaviour, and neighbour disputes.

Recommendation

I ask that suitable amendments are made to the submitted plans to provide surveillance from active rooms in the dwellings to address the blank elevations currently present, and that these are approved prior to planning permission being granted.

Public open space/LEAP

The two proposed LEAP are located in an area where they are not covered by sufficient natural surveillance to protect them and their users from crime and antisocial behaviour. LEAP should have a high level of surveillance provided to it from the neighbouring dwellings. These occupants could act as capable guardians to this area but need to be able to observe the area from active rooms in the dwellings to do so effectively. I am also unable to locate a detailed plan for the layout of any LAP/LEAPs.

'They should be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go.' - Secured By Design, Homes 2019 – p 17.

Recommendation

I ask that LEAPs are relocated to where they are covered by sufficient surveillance from neighbouring dwellings. Clear stem trees (clear to 2m) should be used in the planting to facilitate clear sightlines. Detailed plans should be provided and approved by the local authority prior to permission being granted.

Bin and cycle stores

I am unable to locate plans for the proposed bin and cycle stores throughout the development. Bin and cycle stores must be segregated from each other, and should be secured to a minimum LPS1175 SR1. They should also be located where their entrance is well overlooked by surveillance from the dwellings that they serve. I have concerns that this may not be the case in several places, such as plots 43-46, 440-443. I ask that bin and cycle stores are located where they are covered by sufficient surveillance, and that floorplans/elevations are provided and approved by the LPA prior to permission being granted.

Boundary treatments

There are areas within the development where boundary treatment plans are unclear.

- It is not clear how the outdoor space for plots 440-443 is segregated from the private parking area for plots 452-453.
- There are areas across the development where views into/out of a road are restricted by screen walls – for example plot 2 and 496. Wherever a wall adjoins the entrance to a road or drive, it should be chamfered to up views into the road, such as is seen at plot 500.
- It is unclear what the unmarked space between the driveways and plots 139-144 is?
- I am unable to locate a sufficiently detailed landscape plan to assess this application, particularly to the south of the development where residential gardens back onto what will be commercial space in future applications.

Recommendation

I ask that further details are provided to address the above comments.

Rear access routes

There are several parallel and overly complicated rear access routes serving plots 140-147. Rear access routes, particularly shared ones, can be attractive to crime and antisocial behaviour as they provide a place for groups to congregate unobserved. They also tend to lack ownership, meaning they are not properly maintained and break down over time. This creates unintentional desire lines through the secure building line, undermining the security of the perimeter block and exposing a large number of vulnerable rear elevations. In combination with the rear access routes running parallel, this creates a reasonably large space with no specific ownership, which can become attractive to crime such as fly tipping and creating neighbour disputes.

Recommendation

I ask that the rear access routes are secured as close as possible to front of the secure building line. They should be secured with robust gate with self-closing hinges to prevent it being left visibly insecure, and should be fitted with a key lock operational from either side. Rear access routes should be kept as small and short as possible, serving a maximum of 4 dwellings. They must not run in parallel.

Lighting

I am unable to locate a lighting plan within this application.

Recommendation

I ask that a detailed lighting lux plan is provided prior to permission being granted. Lighting throughout the development should meet the general standards of BS5489-1:2020. The plans should indicate 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.

Cycle routes

The design code makes reference to designated Cycle routes through this development. From plans submitted, I am unable to locate them. The principles in terms of the footpaths and pedestrian access should also be applied to these 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.

I hope that you find my comments of assistance in determining the application and if you or the applicants have any queries relating to CPTED in the meantime, please do not hesitate to contact me.

Kind regards

Kevin Cox.