

Matthew Swinford

From: Planning
Sent: 10 January 2020 16:05
To: DC Support
Subject: FW: Planning ref: 19/02708/OUT. F.A.S.T Zone. Bicester Heritage Buckingham Road Bicester.

From: Carmichael Ian <Ian.Carmichael@thamesvalley.pnn.police.uk>
Sent: Friday, January 10, 2020 2:31 PM
To: Rebekah Morgan <rebekah.morgan@cherwell-dc.gov.uk>
Cc: Planning <Planning@Cherwell-DC.gov.uk>
Subject: Planning ref: 19/02708/OUT. F.A.S.T Zone. Bicester Heritage Buckingham Road Bicester.

FAO: Rebekah Morgan

Dear Rebekah

Planning ref: 19/02708/OUT. F.A.S.T Zone. Bicester Heritage Buckingham Road Bicester.

Thank you for consulting me on the planning application above. I have reviewed the submitted documents and visited the site.

Although I do not wish to object to the proposals, I do have some concerns in relation to the proposed facilities security and crime prevention design. If these are not addressed I feel that the development may not meet the requirements of;

- The National Planning Policy Framework 2018, Section 12 'Achieving well-designed places', point 127 (part 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'. And;
- 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.'

In addition, 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'. This is disappointing as the applicants had the benefit of pre-application advice from the police and appear to have chosen to ignore it. With this in mind, I recommend that the applicants provide an addendum to the DAS that comprehensively addresses crime and disorder prior to submission of any reserved matters application. This document should demonstrate a commitment to achieving accreditation under the police's Secured by Design (SBD) scheme and the British Parking Association's Safer Parking Scheme (Park Mark). Details can be found at; <https://www.securedbydesign.com/guidance/design-guides> and; <https://www.britishparking.co.uk/Safer-Parking-Scheme-/-Park-Mark>

Regardless of this recommendation and to ensure that the opportunity to design out crime is not missed, I request that the following (or a similarly worded) condition be placed upon any approval for this application;

Prior to commencement of development, applications shall be made for Secured by Design and Safer Parking Scheme 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 and Park Mark accreditation has been received by the authority.

In addition to the above request, I offer the following advice in the hope that it will assist the authority and applicants in creating a safer and more sustainable development, should approval be granted:

- The applicants should devise a comprehensive security strategy that covers physical, procedural and personnel security matters. Although this should not form part of reserved matters application documents, it would be prudent to have a security consultant produce this having taken police advice into account.

In relation to the design and layout of the proposals;

- There should be provision of adequate and appropriate defensible space and boundary treatments, depending on building use. This could range from security rated fencing to defensive planting or purely symbolic barriers, but ownership and territoriality should be provided and easily maintained.
- Lighting of vehicle routes, foot and cycle ways and communal parking areas should be to SBD recommended standards wherever possible. However, I accept that the site does have some constraints that may affect this. In addition, it is worth mentioning at this point that low level lighting such as bollards should be avoided as it creates pooling and shadowing of light, and hiding places. Pedestrian scale columns are a far more appropriate solution.
- Natural surveillance throughout the development should not be compromised by the landscaping scheme. Views to/from buildings should be clear from obstruction and remain that way. In addition, lamp column and tree positions (and final growth height/spread) should be planned to avoid reduction in light levels for the lifetime of the development. A holistic approach should be taken in relation to landscape and lighting, and should also consider the positions/views of any CCTV cameras.
- The landscaping design and maintenance plan should ensure that areas of ambiguous ownership are not created so that appropriate standards are maintained.
- Measures to prevent vehicle intrusion on to segregated pedestrian/cycle routes and open spaces should be provided. And, the prevention of vehicle intrusion close to, or in to buildings may also need to be considered, depending on the use and/or value of contents.
- Event security management and the provision of additional physical security measures/procedures at such times should be planned for prior to reserved matters application submission. For example, additional measures may be needed to manage traffic control/flow and more storage facilities may be needed. Management practices at these times should also be covered within the Security Strategy document.
- There should be a comprehensive access control system covering all access points (including any external gates), providing a layered security process and enabling compartmentation of each building where necessary. This should be easy to operate and ensure separation of public, visitor, employee and service areas. Any system should also be capable of adaptation without significant cost/disruption should uses of the proposals change in future.
- Post and other deliveries could pose a significant security threat. SBD's commercial premises guide provides options for specification of appropriate facilities.
- The physical security of buildings containing high value goods and/or commercially sensitive operations is likely to warrant higher specifications of physical security. Again, SBD's commercial provides advice, and of course I am available to assist also.

Finally, the applicants should be aware that SBD has differing levels of accreditation and an award can be achieved by nearly all types of development. With this in mind, I invite them to contact me to discuss the possibility of SBD and Park Mark accreditation and crime prevention design in general, so that any potential crime risks can be designed out as early as possible.

The comments above are made on behalf of Thames Valley Police and relate to crime prevention design only. You may receive additional comments from TVP on other Policing issues regarding infrastructure etc. I hope that you find my comments of assistance in determining the application and if you or the applicants have any queries relating to crime prevention design in the meantime, please do not hesitate to contact me.

Regards

Ian Carmichael

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