



Kevin Cox
Crime Prevention Design Advisor
Thames Valley Police Headquarters South
Oxford Road
Kidlington
Oxfordshire
OX5 2NX

REF: 21/02467/F

Location: OS Parcel 0005 And Part OS Parcel 1300 0878
And 7566, Banbury

09 September 2021

Dear Bernadette,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area, and liaised with the local policing team and Traffic Management officer for Banbury. I have some concerns with the current proposals and I am unable to support 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 2021 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 2021, 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".
- MHCLG'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, 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>

If permission is granted, I ask that the following, or similarly worded condition be placed upon the applicant;

Condition 1

Prior to commencement of development above slab level, an application shall be made for Secured by Design Silver 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.

Reason: To ensure that appropriate physical security is provided, where detail is missing from this application relating to security arrangements, to safeguard future residents and the buildings themselves from crime and antisocial behaviour.

Hotel

- Plans indicate externally opening doors within all ground floor stairwells, potentially providing access into the residential corridors bypassing the reception desk. There is a risk that unless access controlled, these doors may support and facilitate crime, allowing guests to permit access to the internal corridors and stair/lift cores bypassing reception and out of sight of hotel staff. Child exploitation, both sexual and drug related, are emerging crime trends that are particularly prevalent in hotel environments. For this reason it is vital that all guest movements to and from the hotel should be via the permanently staffed hotel reception, where trained staff are able to monitor guest movements and potentially detect and report such activity. The risk of this type of activity occurring within this hotel is heightened given its direct access from the motorway, which may assist cross border offenders who are known to use MSA facilities to conduct unlawful business. In order to mitigate the risk of ground floor doors being exploited, I ask that they are secured as a fire emergency egress doors only. Additional information relating to the security of the fire egress doors must be provided, this should include the proposed locking mechanism (mechanical crash bar or electronic lock release (green break glass), and confirmation that the doors will be alarmed. The fire egress door must not be fitted with external furniture and include a visual door panel allowing individuals to observe the area immediately outside before opening the door.
- It is unclear from plans provided whether ground floor bedrooms will be fitted with opening windows for ventilation. I ask for clarity on this point to be provided by the applicant. If the ground floor bedrooms will have opening windows, there must be a minimum 1m defensible space and planting to all accessible GF windows, and windows should be fitted with restrictors to limit opening.
- Site plans indicate a covered cycle store and bin store located along the western elevation of the hotel. I am unable to locate plans for these stores. Unless robustly secured, these stores are at risk of crime and arson, as they are located in a secluded area with little natural surveillance covering them. I ask that plans are provided for these storage facilities, and if the cycle store is of an insecure design, I ask that this is relocated close to the hotel entrance where it will be suitably covered by natural passing surveillance.
- Given the location of the hotel and the associated crime risk, I ask that a CCTV Operational study be carried out to determine the most appropriate CCTV system for the development, which should cover all public areas, residential corridors, lifts and stair wells. The hotel car park should also be adequately covered, given the lack of surveillance caused by them nature of the site.
- Due to the long straight road leading to the hotel, there is a requirement for Hostile Vehicle Mitigation bollards of the appropriate protection rating, to protect the hotel and it's guests from accidental or deliberate vehicle intrusion. I ask that

Petrol filling station

Making off without payment (bilking) from petrol stations is a high volume crime which currently negatively impacts local police in terms of time and resourcing. To prevent an objection from Thames Valley Police, we request that prepaid or pay at pump is provided in all fuel service areas, deterring offenders at the outset.

In addition, a combination of ANPR and CCTV technologies should be used to detect and prevent drives offs and other criminal activity. The CCTV cameras should be at least 4MP to provide clear images to enable facial identification and identification of vehicle licence plates. ANPR images should be date and time stamped for evidential use.

Office car park

The office car park is first car park people are likely to see in front of the hotel, and as such guests might well park in it, causing issues for the offices. It is important that adequate landscaping and signage is included provide strong visual cues that this is a private car park and that hotel guests need to continue down to the hotel parking area.

Lighting/ANPR/CCTV

Motorway Service Areas can be a conduit for serious and organised crime on a national level, and it is vital that sufficient infrastructure is in place to enable police to detect and prevent cross-border crime. The local policing team is already under significant pressure from demand generated by the MSA at junction 10, and as such it is vital that sufficient provision is made to deter/prevent and detect crime within this site.

- I am unable to locate a lighting or CCTV plan within this application. It is vital that all car parks and publically accessible areas within this MSA are sufficiently lit, and lighting must be designed holistically with landscaping and CCTV to optimise coverage both day and night across the site.

Prior to permission being granted, I ask that a security framework is provided to Thames Valley Police by the applicant, demonstrating how this development will be designed to increase safety and prevent criminal activity occurring at the proposed Motorway Service Area (MSA). This framework should set out how Secured by Design principles will be incorporated into the design to reduce the impact this development will have on police resourcing, to include;

- Landscaping
- Lighting
- CCTV/ANPR coverage
- Car Parking – Consider adopting Park Mark accreditation
- On-site security and management
- PFS Security/Bilking management

Traffic Management concern

Having read most of the assessment it would appear most has been agreed by the Highway Authorities.

I do wonder with the amount of traffic likely to visit this development will an uncontrolled junction on to the A361 effectively work. The A361 Banbury to Daventry road is very busy during the day and will that traffic allow other traffic to exit the site safely.

Have Traffic Signals been a previous consideration and dismissed. OR Is the new junction too close to the Junction 11 roundabout for ATS to operate without causing significant queuing.

Unless I missed it and I might, there seems no mention in the report about traffic associated with HS2 using this road and indeed the facilities. Future traffic using the A361 can only increase and lead to drivers taking a risk when pulling out.

I assume most of the traffic exiting the new services will be turning right back to the Motorway.

Chris

Chris Hulme
Traffic Management Officer
Hampshire Constabulary & Thames Valley Police Joint Operations Unit,

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.