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REF: 22/00489/F

Location: Os Parcel 9078 And 9975 Adjoining Stocking Lane

13 April 2022

Holding Objection

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area. I have concerns regarding boundary treatments and surveillance, and for that reason 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 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 ensure that every opportunity is taken to design out crime, I request that the following (or a similarly worded) condition be placed upon any approval for this application;

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.

Reason

In order to achieve a satisfactory form of development, to ensure that the development remains 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 in accordance with Policy ESD15 of the Cherwell Local Plan 2011-2031 Part 1 and Government guidance contained within the National Planning Policy Framework.

Boundary Treatments

- I note that a significant number of units have hedging proposed for the rear boundary to the property. I have concerns that unless this hedging is currently present, mature and established, any new planting provided that is not backed up with a secondary secure boundary treatment will be permeable and leave plots vulnerable. The rear and side boundary is the entry point for the majority of residential burglaries, and must be sufficiently protected to prevent unauthorised intrusion. Whilst I note the hedge types included within these boundaries are “hostile” plants such as pyracantha, as mentioned above unless fully grown and mature they will not be sufficiently dense for many years, leaving dwellings vulnerable. Additionally, there is a risk that young planting may be damaged or deliberately removed by residents, creating unofficial desire lines through the development. Also, immature hedging is not capable of containing pets within rear gardens, creating a risk of escape and possible neighbour disputes. I ask that boundaries enclosing private rear gardens meet the requirements of Secured by design, Homes 2019 (Page 19, Sections 10.5 – 10.6.12).
- Vulnerable side and rear boundaries that adjoin the public realm, such as (but not limited to) plots 1, 2, 22, 19, and 39 must have defensible space and planting to a depth of at least 1m to provide standoff and demarcation of the change of ownership from public to private space.
 - Defensible space and planting must be provided to protect easily accessible ground floor windows, where it is currently lacking such as plots 13, 14, 23.

Garages

Where garages are connected to the home with an internal access point into the dwelling, the connecting door must meet the standard specified within Secured by Design, Page 30, section 21.3.

Rear access routes

- Rear access routes should be secured as close to the front fascia of the property as possible to improve surveillance over them and remove hiding places. I ask that the rear access gate for plots 1, 2, 4, 9, 10, 11, 12, 17, 26, 27, 29, 46, 30, and 31 are brought forward to remove recessed areas.
- Shared rear access routes must be secured with a key operable lock, which is operable from both sides, and be fitted with self-closing hinges to prevent it being left open.

Surveillance

- There are blank gable ends overlooking parking and public areas (plot 3 for example, but not exclusively), which should be avoided. Blank gables are attractive for crime and antisocial areas as they create spaces that are not well overlooked and where people can loiter unobserved. I ask that all blank gable ends overlooking public areas or parking should have additional windows added on the ground floor from an active room to increase surveillance.
- I recommend House types SUT-SP-761 and BRC-A 922 are handed, to enable an additional window to be placed in the living room gable which provides overlooking of parking and the public realm. A window in a living room is far more beneficial to the development in terms of surveillance and crime prevention than a hallway window which rarely provides surveillance.
- Corner plots must be exploited, with orientation and sufficient windows in ground floor active rooms (kitchens and living rooms) designed to turn the corner and maximise surveillance over the public realm. In curtilage parking, such as that between plots 19-20 must be overlooked on the ground floor by windows from the plots that they serve to provide guardianship over the vehicles and garages in this space.

Lighting

I am unable to locate an updated lighting plan within this application. It is vital that this development is sufficiently lit to reduce the opportunity for, and fear of crime. All public roads should be sufficiently lit to meet the standards of BS 5489-1:2020. In order to address this concern I ask that the following (or similarly worded) condition be placed upon the applicant should approval be granted;

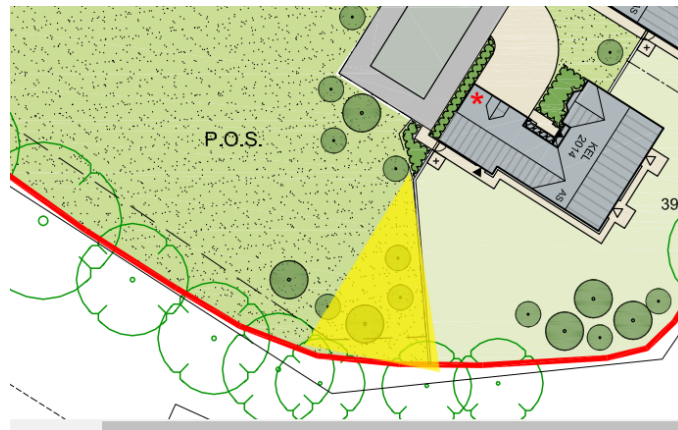
Condition 2

Prior to commencement of development above slab level, 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 promotes a secure environment and does not cause a nuisance to local residents.

Reason: To ensure that appropriate levels of lighting are provided to safeguard the development and reduce opportunities for, and the fear of crime and antisocial behaviour.

Public Open Space

- 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 illegal encampments.
- The recessed area between plot 27/28 should be enclosed within the boundary of these plots, or secured via deep defensible space and planting.
- The side boundary of plot 39 adjoining the POS is particularly vulnerable as it lacks defensible space, whilst adjoining an easily accessible recessed area of POS with poor surveillance covering it. As previously mentioned it is vital that these boundaries are sufficiently protected. Additionally, tree planting must be located a sufficient distance from dwelling boundaries to prevent them being used as a climbing aid. I recommend this space is reconfigured to remove the recessed area and improve surveillance over this area:



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.