



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

**REF: 22/01488/OUT**

**Location: OS Parcel 5616 South West Of Huscote Farm  
And East Of Daventry Road Banbury**

18 August 2022

**Holding Objection**

Dear David,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area. I have also liaised with colleagues in traffic management and the local policing team. At this stage I do not have sufficient information to support this application in its current form, and therefore must object. The objection from Thames Valley police may be addressed by the submission of additional documentation and information to address the following points. In addition, should this application be approved, I ask that following, or similarly worded conditions be placed upon the approval.

**Condition 1**

*Prior to commencement of development, 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.*

**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, particularly around parking areas, promotes a secure environment and does not cause a nuisance to local residents.*

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>

### **Location**

- I have fundamental concerns that the proposed access to the site will be problematic in terms of potential significant impact on the M40 junction and surrounding road network, particularly the A422, which is already operating at capacity. Adding additional LGV movements to this junction increases the risk of queues, which may impact the off slips and cause traffic to queue back onto the M40, a potentially dangerous situation which must be avoided.
- With further development already under construction directly off this roundabout, I have concerns that the true impact of this already approved development is not yet known, and as such further development may have cumulative negative impact on traffic flow in this area.
- We are unable to locate any details relating to sustainable travel to the site – plans do not indicate any safe cycling or walking routes to the proposed development.

### **Security**

- Given the location is directly accessible from the strategic road network, this site will be particularly vulnerable to organised and targeted crime. The strategic road network provides opportunities for cross boarder crime, and the ability for offenders to access and leave a target site with speed, making detection and apprehension of offenders more challenging. For this reason, it is vital that security and crime prevention are fundamental considerations for any development in this location.
- The provision of warehousing and large amounts of car parking in this location provides ample opportunity for crime to occur, particularly given that the site and car parks within are likely to be occupied at all times of day and night. For this reason, boundary treatments, access control, formal surveillance and lighting will be of utmost importance to protect this site from crime and ASB. In order to ensure every opportunity is taken to design out crime and reduce opportunities for crime from the outset, I ask that the applicant agrees to achieve a minimum of Secured by Design Silver accreditation on the development.
- In order to maximise opportunities for the detection and apprehension of offenders, Thames Valley Police will seek financial contributions via a S106 agreement, in order to enhance and extend our existing ANPR network to cover this site. My colleague Simon Dackombe will be in contact separately regarding this requirement.

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.