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Oxford Road
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REF: 22/02068/REM

Location: OS Parcel 7400 Adjoining And South Of Salt Way Bodicote

Objection

Dear Linda,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area. The National Planning Policy Framework 2021 demonstrates the Government's commitment to creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. With this in mind it is important to consider all appropriate crime prevention measures when viewing the proposals to safeguard the community, its occupants and prevent the development negatively impacting police resources.

Having reviewed the submitted documentation, I have significant concerns that the resultant development will not reach the requirements set within the NPPF. The proposed development includes many negative attributes in terms of opportunities for crime to occur, such as a high level of exposed boundaries, badly designed parking and poor surveillance in many areas. This goes against guidance provided by Secured by Design and the proven theory of Crime Prevention Through Environmental Design. For that reason, I am afraid I am unable to support this application, and must strongly object.

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.'
- Section 17 of the Crime and Disorder act 1998.

In addition, I am unable to locate a Design and Access statement or planning statement within this application. This application should be accompanied by a Design and Access Statement (DAS) which adequately addresses 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 section within 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>

Should this application be approved despite my objection, I ask that the 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.

To aid the applicant; It will be critical that bollard lighting is not used. Bollard lighting is not appropriate, as they can be damaged by reversing vehicles and more critically they don't provide enough light at the right height to aid facial recognition.

Parking

- I have fundamental concerns that excessive use of large rear parking courts, which significantly lack surveillance, leaves large areas of the development very vulnerable to crime and antisocial behaviour.
- I note FOG access to some parking courts appears to be gated, however the size of the proposed parking courts, exposing all boundaries of entire blocks, remains an objectionable proposal.
- Numerous parking courts are excessively permeable, with several possible routes through them or where separate parking courts are interconnected.
- Garages should not be located in rear parking areas where they are not covered by sufficient surveillance to protect them from crime – the garages for plots 1-5 for example are particularly vulnerable to burglary.
- Parking areas commonly lack surveillance – ground floor/first floor obscured windows do not provide any surveillance (plot 20 for example).

'Crime and anti-social behaviour are more likely to occur if:

Building and private and communal spaces have a large number of sides exposed to the public realm'

Ref Safer Places, Structure

Recommendation

Parking and block layouts, particularly to the south of the site, must be redesigned to incorporate the following guidance. Wherever possible, in curtilage parking is preferred. In any case, a parking space must be covered by active surveillance from the dwelling that it serves, providing parked vehicles with a capable and appropriate guardian. Locating parking to the rear boundary of the plot should be avoided, as it restricts the opportunities for surveillance and leaves vehicles vulnerable to crime.

As rule, parking courts should be avoided as they can attract those intent on crime and antisocial behaviour.

Rear parking courts should be completely avoided, as they undermine the security provided by a secure perimeter block. They are often 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 residential 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 parking courts creates an ideal gathering location for non-residents to meet whilst providing a legitimate excuse to be there.

Where parking courts are necessary (such as for apartment blocks), to mitigate the issues mentioned above it will be critical that:

- The parking courts are well lit with column lighting - lighting in parking court areas is a contentious issue as the question around who pays for the power usually arise, therefore these column lights will need to be fed from the adopted highway.
- Tandem parking spaces within parking courts must be avoided, as they create issues regarding ease of use, requiring a significant amount of manoeuvring in reverse, creating a risk of vehicle collisions and injury to pedestrians. Very often, tandem parking results in inappropriate parking on the highway, creating safety and obstruction issues.
- Tree planting within parking courts must be a clear stemmed variety clear to at least 2m to facilitate clear sightlines and surveillance, and they must be designed and located holistically with the lighting scheme to avoid shadowing and pooling of light.
- Bollard lighting is not appropriate and must not be used, as they can be damaged by reversing vehicles and more critically they do not provide sufficient light at the right height to aid facial recognition and reduce the fear of crime. It does not deter crime and antisocial behaviour.
- They must have a high level of active surveillance from adjoining dwellings, and defensible space must be provided between the parking bays and any abutting property boundary.
- Defensible space must also be provided to the boundaries of properties forming the entrance to a parking courts.
- Parking spaces within parking courts must be directly adjacent to the property that they serve wherever possible.
- All spaces within parking courts must be allocated – no casual or visitor parking should be provided within a private parking court. 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 rear parking court.
- Visitor parking should be provided on-street where it is covered by surveillance from surrounding dwellings.
- Parking courts must not be excessively permeable, and should only have one single combined entry and exit point.
- The entrance to a parking court must be overlooked by active surveillance.
- Where on-street parking is provided, it must be located where it is overlooked by active surveillance from dwellings.
- Where coach house/FOG style entrances are utilised as entrances to private parking courts, these should be secured by electronic gated access that controls both vehicle and pedestrian movement.

Lighting

I am unable to locate a lighting plan within this application. Lighting throughout the development should meet the general standards of BS5489-1:2020. Lighting plans should be provided which should set out 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.

Vulnerable plots

Similar to comments above, many plots are left more vulnerable to crime due to being excessively exposed on an excessive number of boundaries. This includes;

- All plots within the block 1-10, 13-20.
- All plots within the block 21-29, 34-41.
- All plots within the block 107-122, 125-131.

- All plots within the block 183-198, 201-205.
- All plots within the block 225-227, 233-240.
- Plots such as 87 and 100

Rear access routes

Rear access routes must be secured to the front of the building line, and secured with a robust key operated lock operable from both sides. Rear access routes should be singular and must not run in parallel with the rear access for another plot. Shared rear access points should be avoided, but where they are unavoidable they should serve no more than 4 dwellings. Rear access routes across the development are left exposed due to missing gates or gates within a recessed area, plots 37, 56-57, and 89 as an example. I ask that all rear access routes are gated in line with the secure building line to remove recessed areas.

Emergency access route

It is unclear how the emergency access route will be secured from unauthorised use, particularly motorcycles/mopeds. I note retractable bollards are indicated on plans, but I am unable to locate any details as to the specification of them. In addition it is unclear how they would be secured or removed in an emergency situation.

Bin stores/collection points

- Bin collection points must be located away from dwelling boundaries, to prevent bins being used as climbing aids over vulnerable side or rear boundaries (behind plot 4 for example).
- Bin collection points, for example next to plot 117 and 119 are located directly next to a parking space creating a risk of damage to parked vehicles and subsequent neighbour disputes. BCP's should be located a sufficient distance from parking spaces to mitigate this risk.
- I note FOG units appear to include exceptionally large bin stores for the unit – it is unclear what the purpose/function of a bin store this size is (Plot 14 for example). I ask that the applicant clarifies the reason for a store of this size? If this store is for the use of more than one unit, I ask that plans are updated to indicate the internal arrangement of bins within the store. Any internal bin store should be secured to a minimum LPS117 SR1. In addition, it should not be larger than necessary – providing bin stores larger than required for communal use is highly likely to result in inappropriate use of the space – fly tipping of excess waste and/or large items for example.

Cycle storage

- I am unable to locate details of cycle storage within this application. All plots should be provided secure cycle storage either within a locked garage of a sufficient size to accommodate cycles and a vehicle, or within a separate locked store which would ideally be within the rear garden of the plot. Cycle storage should be designed in accordance with the guidance laid out in Secured by Design – Homes 2019.
- Bin and cycle stores should be distinctly separate, and not combined into a single store.

Defensible Space

- Plots across the site are vulnerable to crime and unauthorised entry due to a lack of defensible space and planting to protect vulnerable side and rear boundaries which are accessible from the public realm – Plots 1 – 6, 41, 136 for example. There should be clear definition between the public and private realm. Where the public or semi-private realm adjoins private areas of the development, defensible space and planting should be provided. This will provide an area of 'stand-off', marking the change of ownership and therefore the acceptable activity that is associated with it, protecting the privacy and security of occupants whilst reducing the potential for neighbourhood disputes. This is particularly important where parking areas or public spaces abut vulnerable side or rear residential boundaries. Side and rear boundaries are the entry point for the majority of residential burglaries, and should be protected within a secure perimeter block wherever possible to prevent easy access.
- Tree planting adjacent to a residential boundary should be located a sufficient distance away from the boundary to prevent the tree or any support posts being used as climbing aids over the boundary.

Surveillance

- Opportunities for surveillance across the site are not being maximised, creating opportunities for crime and antisocial behaviour to flourish. One of the key principles of crime prevention is maximising surveillance, allowing offenders to be observed and feel like they may be identified and caught. It is vital that public areas are well overlooked by natural surveillance from surrounding dwellings, and active frontage to all streets, parking areas and to neighbouring open spaces should be a key aim in all developments. Surveillance should be provided at ground floor level from active rooms within dwellings. Active rooms include Living rooms and kitchens, which are most likely to be occupied throughout the day. Blank gable ends that face the public realm must be avoided, as they can be attractive to crime and antisocial behaviour.
- Corner plots must be exploited to maximise surveillance over the public realm, with dual aspect windows from active rooms (kitchens or living rooms) added to “turn the corner”. They should be orientated to maximise the surveillance opportunities they provide.
- Plots across the development have gable ends overlooking the public realm that do not provide surveillance, as they have either no windows or only obscured glass windows – which obviously provide no surveillance at all to the public realm. Some examples being plot 20, 15, 91-92, 131, 141, 231-233.
- Plots 87, 100 and 149 are left vulnerable, as the main entrance to the dwelling is hidden and isolated, not overlooked from the public highway. It is important that all entrances to dwellings address the public realm and are well overlooked, to protect the entrance and people coming and going from the dwelling.

LAP/POS

- The lap opposite plot 74 and 172 is not in a suitably safe or appropriate location. The space is closely bounded on all sides by roads, a crossroad intersection, pedestrian crossing points and driveways where reversing manoeuvres will be required. This location creates a significant number of competing observational demands for drivers, in a very concentrated space, creating a risk of child/pedestrian injury particularly when crossing the road. I have concerns with the proposed proximity of balance play equipment to the road, with a lack of sufficient fencing to prevent incursion into the road.
- I have concerns that there is insufficient public open space within this development, with only two small LAPs available for 240 dwellings. Failing to provide sufficient outdoor recreational space may result in residents creating their own areas of play in spaces inappropriate for such usage, such as car parks or in the road. This creates a risk of accidental damage to property or vehicles, neighbour disputes, community tension and a subsequent demand on police resourcing.
- Failing to adequately protect areas of green spaces creates a risk of illegal encampments. Areas of POS, particularly alongside the emergency access route, should incorporate landscaping or physical barriers to prevent unauthorised vehicle incursion onto areas of POS from the highway.

Maisonettes

There are ambiguous areas of garden space without any clear ownership for each maisonette unit. This creates a risk of neighbour disputes and tension, particularly for ground floor occupants of this plot who may be negatively impacted by activity directly outside their windows, in what should be private space. Outdoor amenity space should be clearly defined and separated for each unit.

Utility Meters

Private utility meters must be located where they are easily accessible and visible from the public realm. They must not be located behind a secure boundary or within the rear garden or rear access routes. Locating the boxes in private areas creates a risk of distraction burglary for occupants, particularly elderly or vulnerable residents. Utility boxes must not be deliberately hidden, as this gives a burglar or criminal a legitimate excuse of “trying to find the meter to read it”, whilst being in private spaces.

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.