



**Kevin Cox**  
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12 January 2023

**REF: 22/02068/REM**

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

### Objection

Dear Linda,

Thank you for re-consulting me on the above application. I have reviewed the amended documents and latest crime statistics for the local area. I maintain fundamental concerns that some elements of the design and layout remain problematic in terms of the potential for crime and disorder to occur, and for that reason I must maintain the objection from Thames Valley Police. I ask that the following comments are positively addressed by the applicant with amendments to plans prior to permission being granted. I have provided my previous comments below for reference, which remain valid for this amended application.

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**

Whilst electronic gates are proposed to secure the rear parking courts, there are still a significant number of issues with the design, particularly considering the number of tandem parking spaces and lack of surveillance over them. Whilst the parking courts may have been tracked, this is irrelevant when considering human nature. Whilst it may be physically possible to manoeuvre a car in and out of the spaces, there will be very little desire for residents to do so, particularly where a number of forward and reverse movements are needed. When a resident needs to use the car in the inside parking bay, the one that was parked in the outside bay is extremely unlikely to be parked back where it was, instead being abandoned elsewhere so that the other car can later return to its original space. Where tandem bays are used, it is a common for both parking bays to be empty, with cars instead cluttering the street, whilst one resident is out. Where parking is considered difficult to use by residents, there is a risk that they will not use the parking area at all, abandoning it and leaving it vulnerable to crime and ASB. They may also choose to use the space for

inappropriate uses, such as the storage/fly tipping of unwanted large items such as furniture, further reducing the attractiveness of the parking and surrounding area.

There is a real risk that this proposal will lead to inappropriate parking on the highway or pavements, obstruction issues, and the need for parking enforcement at a later date.

I would not recommend the use of hit and miss fencing, this does nothing to aid surveillance due to having to be viewed close and from an angle. In addition, hit and miss fencing can be vulnerable to climbing where the rail is exposed between boards. I would recommend any rear boundary surrounding a parking area be of robust construction, ideally screen walls with rounded copings to make climbing more difficult. Garden gates do not provide any surveillance either. I have concerns with the lack of defensible space still present, and the significant amount of vulnerable boundaries left exposed.

The applicant states that parking courts are enclosed and secure with only one point of access – however plans contradict this for the parking serving plots 203-209 with the plot 218 preventing enclosure, rendering the gates useless.

### **Surveillance/vulnerable plots**

- I maintain my concerns regarding vulnerability across this development. Surveillance is still an issue within proposals, with a large amount of parking areas still devoid of surveillance. I have fundamental concerns with the proposals, particularly to the south west of the scheme, where a large number of vulnerable side/rear residential garden boundaries are left exposed whilst lacking significant surveillance from surrounding dwellings. Plot 24 for example still has a large blank elevation and wall removing surveillance and failing to turn the corner. The alignment of the wall for this unit reduces views and surveillance into the road serving this parcel of dwellings.
- Plots 1-4, 19-24 still have all vulnerable boundaries and parking/garages open and exposed to the public realm, whilst relying on only a couple of other dwellings for surveillance and protection. This section of the development remains at high risk of crime and ASB occurring and remains objectionable.

### **Rear access routes**

- Rear access routes remain problematic and insecure, between plot 74/75 for example. All of these routes **must be secured with robust gates fitted with self-closing hinges and key operated locks in line with the building fascia/forward fence line.**
- Ginnels such as between plot 11/12 create the same risks as open/insecure rear access routes. They are also dark and unattractive routes devoid of surveillance that can be highly attractive to crime and antisocial behaviour. I ask that ginnels are removed from the scheme. Alternatively, they should be enclosed with secure key locked doors to prevent unauthorised access.

### **Bin collection points**

Bin collection points are still located where they undermine the security of residential boundaries by providing a climbing aid – behind plot 2 for example.

### **Defensible Space**

Grass is not defensible space and is usually considered public by pedestrians, and does not restrict access up to a boundary - Please see my previous comments. I am unable to locate updated detailed landscaping plans that reflect the amended layout of the development.

### **POS/amenity space**

- I maintain my concerns that the POS opposite plot 31 is in a completely unsuitable location, leaving users vulnerable.
- I am unable to locate any outdoor amenity space for maisonette plots 8/9? They appear to share a small garden with plot 10 with doors from the garden into garages, this is not a suitable or acceptable arrangement as none of the residents of these units have any access to private amenity space.

## Lighting

Details are still missing regarding lighting proposals, and I ask that detailed lighting plans are provided prior to permission being granted.

### *Previous response dated 18/08/2022 – reason for objections*

## 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.