



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

REF: 22/03063/F

Location: Land East Of Larsen Road Heyford Park

16 November 2022

### **Holding Objection**

Dear Will,

Thank you for consulting with me on the above planning application. 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 occupant and prevent the development negatively impacting police resources.

Whilst it is pleasing to see that the general principles of CPTED have been incorporated into the design and layout I ask that the following additional points are addressed prior to any planning permission being granted.

I provide the following comments to ensure forthcoming applications meet 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".

In addition, I do not feel the Design and Access Statement (DAS) adequately addresses crime and disorder as required by CABE's 'Design & Access Statements- How to write, read and use them'. This states that a 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>

### **Bin collection point**

The BCP located to the rear of plots 102/103 leaves these plots vulnerable to unauthorised entry and crime such as burglary, as the bins are located where they could be easily used as a climbing aid to gain access to the rear gardens. I ask that this BCP is located away from residential boundaries to prevent bins being used to facilitate crime.

### **Defensible Space**

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 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 secured within a secure perimeter block wherever possible to prevent easy access.

- Plots 116 and 126 are at risk of unauthorised entry and crime, due to having vulnerable side/rear elevations easily accessible from the public realm whilst significantly lacking surveillance. The location of the pumping station creates an ambiguous area of open space that will be vulnerable to crime and ASB, and exposes these plots excessively. I ask that this area of the development is reconfigured to provide adequate surveillance and protection to these very vulnerable plot boundaries.

### **Surveillance**

- Plots 51, 94, 95, 115 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. The orientation of these dwellings also reduces surveillance potential over the public realm.
- The rear access route for plots 11 and 12 are vulnerable, located in a recessed area lacking any surveillance. I also have concerns that there are rear garden boundaries for western plots alongside the footpath that are also recessed and devoid of surveillance, which provide opportunities for concealed entry attempts into rear gardens. It is unclear how these boundaries interface with the public footpath to the west, and how they will be protected from unauthorised entry attempts.

### **Road layout and speed control**

The development is designed with long straight sections of road throughout, which are going to be very vulnerable to issues of excessive speed and a negative impact on the community. I ask how the applicant proposes to restrict and control speeds throughout the development, without having to rely on police enforcement action. Ideally roads should incorporate frequent deviations in direction, chicanes or other build out features to physically restrict the speeds achievable throughout the development.

### **Boundary Treatments**

It is unclear what side/rear boundary treatment is proposed for the row of plots to the west of the development including plots 1, 11, 12, 25-37 and the northern row 37-51 where they meet the edge of the development. These plots appear particularly vulnerable to crime and burglary, where exposed side/rear elevations are easily accessible from the public realm whilst lacking sufficient surveillance from surrounding development. In addition, there is a risk that residents may consider fly tipping garden waste and other items over their rear boundary into adjoining land, where they cannot see it and no one else would see it being tipped (particularly to the north).

It is vital that these exposed boundaries are sufficiently protected from unauthorised entry by the use of robust boundary treatments that are backed up with defensible planting, that I recommend is of mature age and dense enough to restrict access up to the boundary. Use of thorny species such as Pyracantha or Hawthorne would be particularly beneficial in areas such as these.

To reduce the risk of fly tipping, it has been seen that the use of robust vertical hit and miss fencing reduces incidents of fly tipping over the rear boundary, as whilst the boundary is sufficient to resist intrusion, residents are able to see the land beyond.

The long stretch of rear boundaries facing onto the public footpath also creates a significant risk of crime and antisocial behaviour occurring along this footpath, due to the complete lack of surveillance overlooking it. Wherever public footpaths are provided, they should be protected from crime and ASB by having high levels of active frontage and surveillance overlooking them.

## Lighting

I am unable to locate any lighting plans 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 areas. 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.

Residential dwellings should be provided with security lighting that provides illumination to the main entrance to the dwelling. PIR motion activated “on/off” lighting should not be used, and photoelectric “dusk till dawn” lighting should be used instead. PIR technology may be used to control dimming of the lighting when motion is not detected.

I ask that lighting plans should be provided prior to permission being granted. Alternatively, I ask that the following or similarly worded condition be placed upon the approval;

### **Condition 1:**

***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 and column lighting within parking courts promotes a secure environment and does not cause a nuisance to local residents.***

## Public open space

I have concerns that the proposed “Kick about / active area” is located in an area surrounded with parking and roads, but without any boundary treatments to contain activities taking place within this space. If ball games were to be encouraged in this area, there is a high risk of balls escaping the space and causing damage to vehicles parked in the visitor parking adjacent, or escaping into the road. This creates a risk of children running out into the road after balls, and also a risk of neighbour disputes and community tension in the case of accidental damage to vehicles. Any outdoor space where ball games are encouraged or permitted must be located in an area that is suitably located away from the road/parking and enclosed with boundaries to prevent these incidents from occurring.

The area of public open space is also located directly opposite a long straight section of road, leaving users very vulnerable to accidental or deliberate vehicle incursion into this space. Due to the potential speeds achievable on the run up to this area of public open space, it would be necessary to provide vehicle mitigation measures to prevent vehicular incursion into the area of POS, in the location as indicated below. In any case, areas of green space must be provided with landscaping or physical features to prevent unauthorised vehicular incursion onto areas of open space.

I ask that details and specification of the proposed measures are provided prior to permission being granted.



### **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

If you have any specific queries or require advice on a particular matter, please do not hesitate to contact me.

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.