



**Kevin Cox**  
**Designing Out Crime Officer**  
Thames Valley Police Headquarters South  
Oxford Road  
Kidlington  
Oxfordshire  
OX5 2NX

**REF: 23/01503/OUT**

**Location: OS Parcel 1570 Adjoining And West Of  
Chilgrove Drive And Adjoining And North Of Camp Road  
Upper Heyford**

19 July 2023

Dear Chris,

Thank you for consulting me on the above planning application. I have reviewed the amended plans and have concerns that the proposed NEAP and LEAP are not appropriately located and may be vulnerable to crime and ASB. Therefore I am unable to support this application in its current form.

It is important that any equipped play provision is located in an area well overlooked by high levels of surveillance from surrounding residential dwellings, to provide the facilities with appropriate guardians who will be able to identify and challenge or report crime and antisocial behaviour. The proposed location of the areas of play prevents this, leaving them likely targets for crime and ASB, and damage such as graffiti. Planting and landscaping surrounding equipped areas of play must also facilitate clear sightlines over the facilities from neighbouring roads and dwellings, again to enhance surveillance and reduce opportunities for crime and ASB. Planting surrounding these areas should only include clear stemmed trees with canopies maintained above 2m, and low level hedging maintained below 1m in height. The proposed location of the facilities hides them from view behind vegetation (Particularly the LEAP).

I ask that prior to permission being granted, the NEAP and LEAP are relocated to an area where they are well overlooked by high levels of surveillance from surrounding development.

*I also copy below my previous response to the planning application dated 10<sup>th</sup> June 2022 for ease of reference.*

*Thank you for engaging Thames Valley Police at this early stage. I have reviewed the submitted documents and crime statistics for the area. I appreciate this project is at an early stage, however I was somewhat disappointed to see that crime prevention and community safety is not a significant consideration at this point. Whilst I do not wish to object to this application, I ask that an addendum is added to the DAS which comprehensively addresses the issue of safety and security across the site prior to outline permission being granted.*

*At this juncture, I would like to request and encourage the applicant to engage with Thames Valley Police at the earliest, pre-application stage for all forthcoming Reserved Matters applications wherever possible.*

*In order to safeguard future developments and their residents from crime and antisocial behaviour, I ask that crime prevention and community safety is a key consideration which is specifically addressed within forthcoming applications. I strongly encourage the applicant to consult the guidance provided by Secured By Design, and use the principles contained within the design guides to inform the design of the development, designing out crime from the outset. The principles of CPTED should be incorporated throughout the scheme. The guides for homes, schools and commercial areas can be found here:  
<https://www.securedbydesign.com/guidance/design-guides>*

*Whilst all matters are reserved except for access, I provide the following comments on the submitted illustrative masterplan for the applicants reference;*

- *The primary route through the development is formed primarily with a long, relatively straight section of road. This creates a risk that speeding through the development will easily occur. I recommend ensuring this road is laid out and designed to minimise the risk of speeding, through the use of landscaping, surfacing and deviations in route to reduce the speed of vehicles.*
- *The secondary street connecting the north and south residential areas will be a primary route for pedestrians and cyclists, and therefore it must be promoted as a safe route with lighting along the entirety of the route, which should conform to BS 5489-1:2020, including sections through green space. Proposed tree planting must take lighting into consideration to avoid areas of pooling and shadowing of light at night which can support and create a fear of crime. Sections of the route leave pedestrians vulnerable to crime and ASB, particularly around the pond area where a bend in the road reduces surveillance. I recommend this route is designed with surveillance in mind, and surrounding vegetation and residential development should be utilised to open up and maximise views over this route from both ends.*
- *Footpaths through public open space and wetlands, particularly to the west of the development, may be at risk of crime and antisocial behaviour, due to a lack of surveillance from surrounding developments where vegetation prohibits this. It is important that footpaths provide clear sightlines and have a sufficient width to prevent vegetation restricting views for users, and they should be protected by surveillance from surrounding residential development. Footpaths such as these should not be lit at night, to encourage pedestrians to use primary safe routes which are well lit and overlooked.*
- *The pedestrian connection to camp road at the south-eastern corner of the site (running along the eastern boundary) must be designed with surveillance maximised from surrounding dwellings. Sections running alongside vulnerable side boundaries of gardens lack surveillance, leaving the boundary vulnerable and reducing surveillance over pedestrians using the link. Building orientation and windows in gable ends should be carefully considered to maximise views over pedestrian/cycle only links such as these. Defensible space and planting to a depth of at least 1m must be provided to side or rear boundaries adjoining public footpaths, as well as to any easily accessible ground floor windows.*
- *I have concerns with proposed parking which is located in an isolated position to the rear of several back gardens where it is lacking surveillance from owners. This leaves the vehicles and property boundaries vulnerable to crime. Surveillance is further reduced in this area by the proposed on-street parking which reduces surveillance from ground floor windows of dwellings. I recommend this area of parking is reconsidered prior to submission of further applications;*



- *I would recommend splitting up and relocating areas of visitor parking around the site, on street where it is covered by high levels of surveillance from surrounding dwellings. Concentrating stretches of on-street visitor parking together alongside footpaths (highlighted on the illustrated master plan next to 6 for example) creates a risk vs reward imbalance for an offender, which creates an attractive target and leaves vehicles vulnerable to crime. Visitor parking lacks ownership, which prevents residents identifying or challenging an offender.*



I also provide the following general 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”.*
- *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.’*

### **Parking**

*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.*
- *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 court.*
- *Parking spaces within parking courts must be directly adjacent to the property that they serve.*
- *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.*

### **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.*

### **Surveillance**

*It is vital that public areas are well overlooked by natural surveillance from surrounding dwellings, and active frontage to all streets 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.*

### **Communal residences**

*If apartment blocks are to be included in forthcoming applications, I ask that these follow the best practice recommendations of Secured by design, and details of proposed building security arrangements including access controls and secure mail services should be included within the application. Unrestricted access to apartment blocks should not be possible, and residential access should be controlled by a two-way audio visual system with remote access controls. No trade button should be present. A secure lobby should be provided to all communal entrances. Residents should only have access to areas of the development they have a legitimate need to access. Depending on the size of the apartment block, secure lobbies should also be extended to each floor to enable effective compartmentation.*

*Postal services should not have unrestricted access to private communal areas, and mail delivery should be provided within a secure lobby at the entrance to the building, or via "Through the wall" letterboxes.*

### **Merged cores within apartment blocks**

*Lift/Stairwell cores should not be merged i.e. two or more cores accessing the same area. Merged cores provide permeability through the development undermining access controls and creating a circular movement within the development which is beneficial to crime and anti-social behaviour.*

### **Bin and cycle stores**

*Residential bin and cycle stores should ideally be located within the secure boundary of the property. Where this is not possible, they should be located where they are covered by good natural surveillance, but cannot be used as a climbing aid over a boundary. Internal bin stores should be robustly secured with a single leaf door to a minimum standard of LPS 1175 SR1.*

### **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.*

### **Lighting**

*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.*

### **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.*

### **Excessive permeability**

*Excessive permeability introduces anonymity, making it difficult for residents to identify and challenge who should or shouldn't be there. Residential areas should primarily be formed of secure perimeter blocks, which protects the vulnerable side and rear boundaries of properties. Clear and direct routes through developments are important, but they should not undermine the defensible space of neighbourhoods:*

*Maximising Legitimate Activity - Perhaps the most important factor is that footpaths should have a high level of legitimate usage, deterring those intent on crime and anti-social behaviour with the risk of being observed or challenged. To ensure pathways become well used, they must lead to places people need to go, preventing desire lines through the development likely to undermine private space. They should promote a feeling of being a 'safe route' encouraging their usage further. Providing an excessive number of footpaths through developments dilutes activity and usage levels, leaving them vulnerable to crime and anti-social behaviour and providing a network of escape routes for an offender.*

*Maximising Surveillance - To help deter those intent on crime and anti-social behaviour footpaths should in general terms be as straight and as wide as possible, maximising surveillance along the route and allowing people to pass with ease. Landscaping should support clear sightlines and take into consideration surveillance from the residential dwellings (incorporating visibility from active rooms) to the public realm and vice versa.*

*Identifying Primary Routes – It is important that primary pedestrian routes required to navigate the site on a day to day basis are identified. These must be located where sufficient surveillance and lighting can support them to deter crime and anti-social behaviour and provide the user with a sense of security. Those located where lighting or surveillance will be restricted due to ecology and landscaping requirements should be avoidable if the user wishes.*

### **Cycle routes**

*The principles in terms of the footpaths and pedestrian access should also be applied to these cycle ways. Providing dual purpose routes (pedestrian/cyclist) would be beneficial in attracting higher levels of legitimate activity and casual surveillance and should be promoted.*

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.