



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

REF: 23/01586/REM

Location: Proposed Himley Village North West Bicester,
Middleton Stoney Road, Bicester

21 July 2023

Holding objection

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area. I have some concerns with the proposals in terms of the potential for crime and disorder, and for that reason I am unable to support this application in its current form. This objection may be addressed by amendments and submission of further information which addresses my comments below.

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 CABI'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>

In order to ensure all opportunities are taken to design out crime from the outset, and to ensure all areas of the development are sufficiently secured to reduce the opportunities for crime and disorder to occur, I ask that the following or similarly worded condition be placed upon any 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 and column lighting within parking courts promotes a secure environment and does not cause a nuisance to local residents.

Floorplans

I am unable to locate a key or plan confirming the plot numbers of the various house types submitted. Floorplans do not indicate which plot they belong to. I ask that this information is provided prior to permission being granted in order for accurate review of the proposals.

Rear access routes

Current proposals for garden access leave this development vulnerable to high impact crime such as burglary, and creates spaces where crime and antisocial behaviour may flourish. All 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. The boundary treatments enclosing rear access routes should be of suitably robust construction, and I ask that larch lap fencing is changed to closeboard fencing. I ask that additional gates are added across the development to secure rear access routes, as demonstrated below;



Parking

- Parking spaces to the rear of dwelling gardens are at higher risk of crime and ASB due to reduced visibility over cars from the dwellings that they serve. Where this is unavoidable, the boundary treatment enclosing parking should be designed to enable surveillance – I ask that 1.5m close board fencing with a 0.3m trellis topper is used to provide views over parking from the garden of the plot that it serves.
- Unallocated visitor parking within private parking courts (such as apartment blocks) introduces anonymity and prevents occupants identifying or challenging an offender. All parking within private parking courts must be allocated, with unallocated visitor parking located on-street outside the private parking area.
- In curtilage parking and garages must be well overlooked by surveillance from the dwelling that it serves. Whilst unclear due to lack of numbering on floorplans, it would appear many driveways and garages across the development are not overlooked, with blank gable ends creating opportunities for crime. Additional windows must be added to the side elevation of all plots overlooking parking to provide surveillance from the dwelling. The window should be within the kitchen or living room, which is considered “Active”.

Defensible Space

I am unable to locate detailed landscaping plans within the application, and ask that these are provided prior to permission being granted. 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 to a depth of at least 1m 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. I ask that additional defensible space and planting is added to exposed side and rear boundaries across the development.

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. I ask that additional windows are added in corner turning plots to maximise surveillance – plot type Tulipwood for example should have an additional window in the sitting room and dining room to turn the corner and enhance surveillance.

Communal residences

The security arrangements of apartment blocks should 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. 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.

To aid the applicant the attributes of the access control system should include:

- Access to the building controlled via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.);
- Vandal resistant external door entry panel with a linked camera;
- Ability to release the primary entrance doorset from the dwelling;
- Live audio/visual communication between the occupant and the visitor;
- Unrestricted egress from the building in the event of an emergency or power failure;
- Ability to recover from power failure instantaneously;
- Capture (record) images in colour of people using the door entry panel and store for those for at least 30 days. If the visitor door entry system is not capable of capturing images, then it should be linked to a CCTV system or a dedicated CCTV camera should be installed for this purpose. This information should be made available to police within 3 days upon request
- All visitor and resident activity on the visitor door entry system should be recorded and stored for at least 30 days. This information should be made available to police within 3 days upon request.
- Systems must comply with General Data Protection Regulations (GDPR)
- Compartmentation through the building must be achieved through the programming and positioning of the access controls to restrict access to each floorplate.

Bin and cycle stores

Communal bin and cycle stores should be robustly secured with a single leaf door to a minimum standard of PAS 24:2016 (Note 23.4b), or PAS 24:2022 (Note 23.4b), or STS 201 Issue 12:2020 (Note 23.4c), or LPS 1175 Issue 7.2:2014 Security Rating 2+ (Note 23.4d), or LPS 1175 Issue 8:2018 Security Rating A3+, or STS 202 Issue 10:2021 Burglary Rating 2 (Note 23.4d), or LPS 2081 Issue 1.1:2016 Security Rating B (Notes 23.4d and 23.4e), or STS 222 Issue 1:2021.

Bin collection points must be located away from residential garden boundaries to prevent bins being used as climbing aids to gain access to rear gardens (plot 20 and 57 for example).

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.

I ask that lighting plans are extended to include private roads, in particular where visitor parking is located and parking courts.

All residential dwellings should be provided with photoelectric "Dusk till dawn" lighting which illuminates the main entrance of each dwelling. PIR on/off lighting should be avoided as it does not deter crime and has been shown to increase the fear of crime.

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

The above comments are made on behalf of Thames Valley Police and relate to crime prevention design only. I hope that you find these comments of assistance. If you have any queries relating to crime prevention design, please do not hesitate to contact myself.

Kind regards
Kevin Cox.