

REF: 23-02098-OUT

**Location: Begbroke Science Park, Begbroke Hill,
 Begbroke, OX5 1PF**

17 January 2024

Dear Andrew,

Thank you for re-consulting me on the above planning application. I have reviewed the amended plans and also correspondence received directly from the applicant dated 11th November 2023, responding to my comments dated 6th September 2023. I maintain significant concerns that comments made have not been addressed, and maintain my comments copied below. I note that between Outline and Reserved Matters, the applicant is intending to submit further applications for this development titled “Neighbourhood Area briefs”, a new and not usually seen step in the planning process. I understand this additional layer of application will introduce further “Control documents”, which all future reserved matters applications will have to comply with. I ask that my below comments are considered and positively addressed in any future applications.

I note within the re-submitted design code there appear to be numerous pages missing. I ask that the applicant clarifies why these pages are not included within this submission?

I also provide the following response to the applicant regarding the submitted design code.

Section	Comment	Applicant Response 10/11/23	TVP Response 15/01/23
3.1	As mentioned above Landscaping should also facilitate clear sightlines and surveillance throughout the development.	Principle 3.1.1 requires long and short range views to be identified through Tier 2 submissions. Principle 3.1.5 requires connections to open spaces to be safe. The above are considered sufficient at this stage to ensure that landscaping areas will not be unsafe and will be appropriately overlooked and surveyed.	Noted.
3.2	As above particularly for parking areas planting must facilitate clear sightlines.	This section relates specifically to biodiversity rather than landscaping per se. Given the above, no changes are considered to be required.	Noted.
3.4	Play areas must be carefully located where they are well overlooked by surveillance from surrounding	Agreed. We suggest that principle 3.4.5 is amended as such:	Noted, however “Where practical” suggests this may not always be the case – as per my

	development.	“Clearly defined equipped play area should be integrated within each neighbourhood <u>and should benefit from passive surveillance, where practical.</u> ”	comments this should always be the case to prevent crime and ASB within these facilities, as such I suggest removing “Where practical” from the design code.
3.6	Active frontage must be maximised, with all public spaces well overlooked by surrounding development. Corner turning plots must have dual aspect frontage overlooking the public realm.	These points are considered to be adequately covered by principles 3.6.1-3 and 3.6.5. Requiring active frontages to be ‘maximised’ is not considered to be appropriate for an outline planning stage, where there is further design work to do and decisions to be made by the Council.	Noted – this point to be picked up in subsequent applications.
3.6.3	Blank walls... must be avoided.	We have deliberately refrained from using phrases such as ‘must’ in the Strategic Design Guide. In a development of this size and complexity, it cannot be known whether a blank wall may be necessary or not. We consider that the current wording in principles 3.6.3 and 3.6.4 sets a clear intention in avoiding blank walls, whilst allowing a reasonable degree of flexibility.	Noted – again this point can be picked up in forthcoming control documents.
3.6.12	The proposed development... orientation. Routes throughout the development will be clearly defined and lead to places people want to go. Excessive permeability must be avoided.	We are happy to take on the first recommended sentence, but are reluctant on the latter. Whilst we understand your comments relating to excessive permeability, we are seeking to use the Strategic Design Guide to positively guide future design proposals. The Strategic Design Guide does not require the Site to be as permeable as possible. Therefore, if at later design stages the proposed level of permeability is considered by the Council (or TVP) to be excessive, then the proposals can be resisted on that basis.	Noted.
3.8	Active routes and green arteries must have features to prevent unauthorised vehicular access. They should also have landscaping or physical built features to reduce the risk of motorbike/off road bike related crime and ASB. The	Suggested updated to 3.8.3 (or as an additional code) <u>‘Active travel routes and green arteries should benefit from features that prevent unauthorised vehicular access. All such routes should be safe, accessible and</u>	Noted and I accept the wording suggested.

	<p>movement network must not undermine building security or create excessive permeability throughout the development, which would be highly beneficial to crime and ASB. Primary safe routes must be easily identifiable and accessible to all residents of the development.</p>	<p><u>welcoming to all users.</u>'</p> <p>In preventing unauthorised vehicular access, this will naturally include motorbikes, hence it is not considered this needs explicitly referencing at this stage.</p>	
3.11	<p>All homes will be designed to be safe and secure, meeting the requirements of Secured by Design.</p>	<p>We are happy to include a new design principle requiring all homes to be designed to be safe and secure.</p> <p>However, we do not propose to require all homes to meet the SbD requirements. This is because there may be design elements that do not meet the exact requirements of SbD but which are found, on balance, to be acceptable in planning terms by the decision taker (i.e., the Council).</p>	<p>I highlight to the applicant that as part of the Cherwell Local Plan, Secured by Design is a tool which the LPA uses to ensure all new developments are safe. I will seek Secured by Design accreditation on all forthcoming reserved matters applications, and as such recommend this point is revisited. Note that this point relates specifically to homes, not wider design elements, and as such I do not think this is an unreasonable request.</p>
3.13.2	<p>The design... will be safe, exciting...</p>	<p>Whilst we of course are not proposing to design play spaces that are inherently unsafe and dangerous, we do think there is a role for play areas to provide an opportunity for children to learn about hazards and practice awareness skills. We inherently assume that any play spaces will be safe and do not think this needs to be explicitly stated at this stage.</p>	<p>Please note that in this instance "safe" is referring to crime and disorder issues as opposed to the risk of injury from use of the facilities.</p>
4.1	<p>The indicative arrival road layout will be very vulnerable to speed - I suggest an additional point is added or drawings amended to include a requirement for the road to be designed to the speed intended without the need for police enforcement.</p>	<p>Agreed. The following will be added:</p> <p>'The street should be designed to naturally encourage lower vehicle speeds.'</p>	<p>Noted and accept wording proposed.</p>
4.4	<p>I ask that an additional requirement is added that the park will be protected from unauthorised vehicular incursion.</p>	<p>Agreed. The following will be added:</p> <p>'Landscaping will be used to prevent unauthorised vehicular access into the Central Park.'</p>	<p>Noted and accept wording proposed.</p>
4.5	<p>Openings into the existing</p>	<p>Noted, we think this is</p>	<p>Noted.</p>

	<p>science park should be added with great caution, to avoid undermining the security of existing development, particularly important to make sure any openings don't enter into vulnerable private space such as service yards or building boundaries where this little or no surveillance.</p>	<p>adequately covered by allowing openings to be created 'where appropriate'. More detailed proposals will be put forward and considered through Tier 2 and 3 submissions.</p>	
4.6 RD2	<p>Given the nature of development and possible uses of buildings, particularly for lab space, it may be inappropriate for buildings to be open and permeable/publicly accessible. This creates significant risk particularly where buildings may contain valuable or potentially dangerous holdings. I do not think this should be mandated as it may restrict the acceptable uses of buildings going forward, particularly if labs are proposed. Excessive permeability and a lack of secure lines makes the identification and apprehension of offenders far more difficult.</p>	<p>Noted and agreed. RD2 does not equate to a mandate as it only sets out that buildings 'should' be open and welcoming. If a particular building did need additional security, then this would not contravene the SDG. No updates are considered necessary, therefore.</p>	<p>Noted.</p>
4.6 RD3	<p>Again I have fundamental concerns that servicing areas may permit pedestrian access, as these areas are often the most vulnerable areas of a building with numerous routes of access into buildings whilst having limited surveillance. Excessive and open permeability around private commercial buildings makes it impossible for the tenants to identify or challenge the presence of an offender, creating significant vulnerability and opportunities for criminal activity and hostile reconnaissance.</p>	<p>Noted. This principle relates more to the servicing routes rather than the areas themselves. We will update the wording to make this clearer.</p>	<p>Noted.</p>
4.7 GA12	<p>I have concerns that excessive permeability may undermine the security of the development, creating opportunities for crime and ASB, and providing multiple routes of escape for offenders making apprehension almost impossible. If this</p>	<p>Noted. We have committed to updating section 3.8 to ensure that unauthorised vehicular access is suitably restricted. The incorporation of non-vehicular green arteries is however a fundamental part of the design vision, one that has been discussed at length with</p>	<p>I maintain concerns regarding permeability and the potential to increase crime and ASB within residential areas, and this proposal may hamper any emergency services response to these sites.</p>

	development is left highly permeable, it may become a significant target for criminal activity.	the Council and independent Design Panel, both of which support the proposals.	
4.8	Illustration for points 1,4,5 (top right) - this image indicates private patio areas are open and directly accessible from the public realm, with no defensible space or standoff, which would not be acceptable.	This is just an illustrative image and does not necessarily set a precedent for future development. We are not proposing to update this image, however.	Noted, however I have concerns that illustrations of unacceptable design are included in an important control document.
4.11	See above, I have fundamental concerns with the proposed parking strategy for this area of the site. Parking must be safe and secure, and must have high levels of surveillance and ownership from the dwellings it serves. Thinking about the government drive to reduce violence against women and girls, research shows that women feel and are most vulnerable to crime in the first and last section of their journey. Thinking of a lone female having to go from her car to her front door at night, the location and design of parking must ensure she feels safe.	Noted. The plan image is illustrative but indicates that the parking areas would be very well overlooked by residences. The scales involved are not large and it would be only a short distance from the parking area to the dwelling. More generally on parking, whilst we acknowledge and appreciate your comments, we also have to balance comments such as your against the County Council's Street Design Guide, which clearly sets a preference for ' <i>innovative parking solutions which keep as much parking within the public realm... or at least have the ability to become public realm as car ownership drops resulting in less spaces being required.</i> ' Our strategy does not place a blanket requirement for one type of parking over another, only a preference for consolidated parking areas to allow living streets to be delivered, in accordance with the County Council's guidance.	Noted. I hope I am given the opportunity to work with the design team at the earliest pre-application stage to ensure secure parking areas for this development.
4.11	No guidance is given as to how the design and layout of this area will prevent unauthorised or inappropriate parking.	This is a level of detail that we consider is more appropriate to Tier 2 and 3 submissions.	Noted.
4.11	Benches within private residential streets must be carefully considered, otherwise may be attractive to loitering and ASB particularly if they are lit in the evenings and at night.	Noted.	
4.12	This requirement is unclear	The security arrangements for	Noted.

RB7	and I cannot ascertain how allotments are to be enclosed and protected. Allotment sites are high risk targets for crime, antisocial behaviour and theft. As per my guidance below, they must be secured and enclosed to prevent unauthorised entry. Failing to adequately protect allotments and leaving them open to crime and damage creates a significant risk that after incidents, residents will abandon them, creating an underused and unattractive space that will be a crime and ASB generator.	the allotments will be a matter for Tier 2 and 3 submissions. At this point, we are seeking permission only for the indicative location of the allotments and setting out high level design principles for delivering them.	
4.14 CS6 / CS7	I recommend adding a requirement for vehicle mitigation measures to prevent unauthorised vehicular incursion (including off road motorcycles).	CS6 requires vehicular access to be kept to an absolute minimum, which is considered an appropriate control for this stage of planning. We will though consider further measures to ensure that unauthorised vehicular access into the park (indeed all landscaped areas) is reasonably restricted.	Noted. Please also note that it is imperative that any car-free residential streets must be very carefully designed to fully prevent unauthorised vehicular entry. Other developments around the country where these types of streets have been proposed have seen constant incidents of residents driving vehicles onto green spaces for convenience and ease of dropping off children, shopping etc. at their front door. The result of which was severely damaged and unattractive green spaces which then significantly detracted from the street scene, that have had to be hard surfaced or otherwise, undermining the entire scheme.

I also maintain my previous comments as outlaid below.

Comments on outline documents/plans provided

Vehicle access and parking

- I note the concept “Car as a guest”, which puts a far higher emphasis on walking and cycling as sustainable modes of travel, and removing vehicles from movement corridors throughout the development. With this desire comes unique challenges in terms of safety and security. It will come as no surprise that a pedestrian walking or cycling is more likely to become a target for crime than if

they were locked within a moving car whilst completing their journey. Traditionally, we have always promoted the principle of “primary routes”, where pedestrians, vehicles and building frontages come together to form a route with high levels of surveillance and activity at all times, which naturally provides a level of protection to those using the primary route. Where the desire to remove vehicles from the street is being pushed forward, this element of activity and surveillance is removed. It is therefore important to ensure that other design considerations are taken to ensure all movement corridors are safe and welcoming for all, and opportunities for crime and antisocial behaviour to occur are minimised. I ask that the applicant ensures forthcoming applications document in detail how all public open spaces and streets will be safe.

- I have fundamental concerns with the proposed consolidated parking together at the end of streets, in what I assume will be parking courts. Parking is the number one demand generator for Thames Valley Police, and our Chief Constable receives more correspondence complaining about parking than any other issue. Poorly designed or inconvenient to use parking is a significant contributor to neighbour disputes and community tension, undermining the health and wellbeing of communities. It is imperative that any parking provision across the site is developed and designed to be convenient and minimise opportunities for crime and ASB, and to ensure the parking scheme is not undermined.
- I have particular concerns that the DAS states vehicles will be parked in parking courts away from homes, but residents will be able to pull up outside the home to drop off shopping or children for example. I have concerns that this approach will not function as intended, due to human nature. At night or in inclement weather, residents will likely choose to park vehicles on street outside their homes and instead of moving them to the parking area, and we may see a cluttered street scene with highway obstruction issues and disruption to services such as emergency services access and refuse collection.
- Particularly taking the child drop off proposal provided in the DAS section 5.4, in the interest of child safety and parental responsibility I cannot condone and must challenge the notion of a parent dropping children at home and leaving them unaccompanied to go and park the car elsewhere.
- If vehicles are only able to be parked in open accessible parking courts they are legally defined as being in a public place, and as such must have appropriate tax and insurance. If residents do not have any private or on-plot parking, this may create legal issues for residents when declaring a vehicle SORN for example.
- Off road motorcycles/dirt bikes are a creator of noise and antisocial behaviour in other areas locally. It is important that all connectivity routes and green spaces are designed to prevent motorcycle enabled ASB.

Parking Barns

- Parking barns are potentially a highly problematic suggestion in a residential setting, and I strongly urge the applicant to consider this proposal further prior to submission of detailed plans. Parking barns are essentially enclosed car parks or multi-storey car parks that may be very vulnerable to crime and ASB. Should these be included in forthcoming applications, it is imperative that the following issues are addressed in detailed plans;
 - Parking barns may lack ownership due to being remote from the homes that they serve and not under any particular persons’ control.
 - The design of barns may prevent surveillance from the surrounding development, leaving vehicles vulnerable to crime/damage.
 - It should be noted that not all offenders are external to a development, and as such access to a large covered parking area still creates an opportunity for crime, even with CCTV in

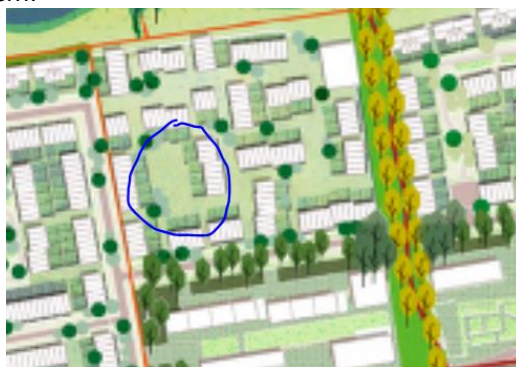
place. If an incident happens it could be days or weeks before the owner of a vehicle realises, reducing or removing opportunities for identification and prosecution of offenders.

- How will spaces within parking barns be allocated?
- How will residents be prevented from parking on street outside homes instead?
- How will access be prevented to unauthorised persons, and how would visitor parking work if barns are used? Visitors should not be permitted entry into the barn, and on street parking closer to homes is likely to be used by residents instead.
- How will vehicle tax and insurance work in a publically accessible parking barn, should someone wish to store a vehicle within the barn without tax or insurance? If there were an accident within the barn then this may be a significant legal issue for residents to overcome.
- EV charging equipment theft is a crime on a significant upward trajectory – how will EV charging be managed within a parking barn where surveillance may be reduced?

All parking provision for the development must comply with the requirements of Secured by Design – Homes 2023 (section 16), and the requirements set out under “Parking” in my detailed guidance below.

Block arrangement

- Residential development should be formed with secure blocks and have clear defined ownership boundaries to reduce opportunities for crime, ASB and neighbour disputes. Some illustrations within the DAS indicate areas where public open space and private residential gardens are not easily distinguishable (Section 5.3 for example). Clearly defined boundaries with defensible space and planting must be provided throughout the scheme. Particularly for front gardens, it should be clear to anyone using the space where public space ends and private land begins. Any green links and active travel corridors through development must not expose vulnerable side or rear residential garden boundaries, as this would open these dwellings up to an elevated risk of high impact/harm crime such as burglary.
- The illustrative masterplan includes areas of development that appear to have very excessively permeable block structures that may be at elevated risk of crime and ASB, such as below. Rear gardens are very vulnerable and are the entry point for the vast majority of residential burglaries, and as such every effort must be made to enclose and protect them. Blocks should ensure gardens are as enclosed and inaccessible as possible, such as seen with a traditional perimeter block arrangement. The exposed rear gardens backing onto open space such as circled below would likely result in an objection from Thames Valley Police due to the risks of crime where a lack of surveillance would be a significant problem.



Tree planting and landscaping

- The green arteries and living streets are to feature significant tree planting. It is imperative that all planting throughout the scheme is designed to avoid any conflict with lighting or reduce surveillance over the public realm. For this reason it is important that in forthcoming applications the applicant demonstrates that landscaping and tree planting will not create conflict.
- Green spaces and landscaped areas must not introduce excessive permeability into the development. Excessive permeability creates significant opportunities and risk in terms of crime and

antisocial behaviour, and must be avoided. Please see the guidance on excessive permeability provided below.

- Green spaces must not undermine the privacy and security of residential dwellings. Where they are located close to dwellings, the acceptable uses and activities to take place in the space should be clear. For example, sports and ball games must not be promoted where this activity is directly adjacent to private residential boundaries, doors or windows where the activity and associated noise could cause disturbance to residents, undermining community cohesion.
- Urban furniture, such as the “meeting pod” in section 5.7, must be very carefully designed and sensitively located to ensure only legitimate usage is made of spaces. In the illustration provided on this page, there is a high risk that if this was within a residential street as suggested, it would be very attractive to loitering and ASB particularly in the evenings and at night. Furniture must be located where it is well overlooked by surveillance to reduce opportunities for crime and ASB.
- Any tree planting must be located a sufficient distance away from residential boundaries to prevent trees or their support structures being used as climbing aids.

Railway halt

- The proposed railway halt introduces national infrastructure with specific crime and security requirements to the development. I ask that my colleagues at the British Transport Police are engaged and consulted as a matter of course for this development, as this area of the development will fall under British Transport Police control outside of the remit of Thames Valley Police.
- Externally to the railway halt, there is a risk of neighbour disputes and community tension related to parking issues where people may wish to park inappropriately when using the halt. Future applications will need to demonstrate how parking in and around the railway halt will be designed and managed to prevent unauthorised parking and community disputes.

Road layouts

Road layouts must have sufficient engineering to ensure compliance with speed limits, without the need for police enforcement.

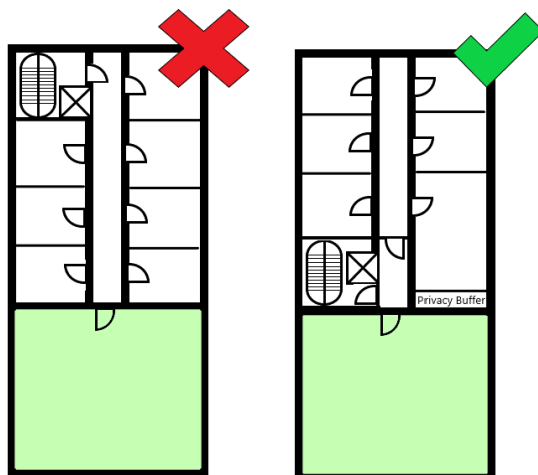
Podium gardens / rooftop amenity space

Podium gardens can be problematic in terms of providing opportunities for crime and antisocial behaviour, in particular;

- Podium gardens may allow easier transmission of noise over greater distances, where generators of noise such as people or music are elevated above street level, allowing sound to travel further. This can be problematic in residential areas, unless robust management practices are in place to prevent noise and disruption. Practices could include access controls that prevent access to podium gardens outside of certain hours, and building management teams actively monitoring and addressing inappropriate usage.
- Residents of the floor/dwellings directly adjacent to the podium garden may be more vulnerable to disturbances and inconvenience caused by noise and activity associated with use of the podium garden.
- Podium gardens may provide access to the roof or provide opportunity at high level for those in crisis. It is vital that any boundary enclosing a podium garden is carefully designed to mitigate this risk and prevent the potential for climbing and jumping from the podium garden.
- Undermining the security of the building;
 - Where access controls are not sufficient to prevent unauthorised access, or where access to the podium garden is achieved via what should be private residential corridors. Where this happens, the residents on the floor with the podium garden are at higher risk of crime and antisocial behaviour due to having all residents of the block being able to access their floor.
 - The podium garden may be used as an excuse by an offender for being in private areas of the development that they should not be in – for example that they are trying to find the garden or are heading back to a friends apartment after being in the garden.

Due to the concerns they raise, I would recommend podium gardens are not included within this scheme. However if they are to be included, I ask that I am engaged at an early stage to ensure all risks associated

with podium gardens are designed out from the outset. In particular it is vital that any podium garden or other shared amenity space within residential blocks is designed so it can be accessed directly from a core without undermining the security of the floorplate;



Strategic Design Guide

- Section 3.1 – Principles – As mentioned above Landscaping should also facilitate clear sightlines and surveillance throughout the development.
- Section 3.2 – Principles – As above particularly for parking areas planting must facilitate clear sightlines.
- 3.4 – Principles – Play areas must be carefully located where they are well overlooked by surveillance from surrounding development.
- 3.6 – Principles – Active frontage must be maximised, with all public spaces well overlooked by surrounding development. Corner turning plots must have dual aspect frontage overlooking the public realm.
- 3.6.12 – The proposed development ... orientation. Routes throughout the development will be clearly defined and lead to places people want to go. Excessive permeability must be avoided.
- 3.6.3 – Blank walls... must be avoided.
- 3.8 – Principles – Active routes and green arteries must have features to prevent unauthorised vehicular access. They should also have landscaping or physical built features to reduce the risk of motorbike/off road bike related crime and ASB. The movement network must not undermine building security or create excessive permeability throughout the development, which would be highly beneficial to crime and ASB. Primary safe routes must be easily identifiable and accessible to all residents of the development.
- 3.11 – Principles – All homes will be designed to be safe and secure, meeting the requirements of Secured by Design.
- 3.13.2 – The design ... will be safe, exciting...
- 4.1 – The indicative arrival road layout will be very vulnerable to speed – I suggest an additional point is added or drawings amended to include a requirement for the road to be designed to the speed intended without the need for police enforcement.
- 4.4 – I ask that an additional requirement is added that the park will be protected from unauthorised vehicular incursion.
- 4.5 – IS4 – openings into the existing science park should be added with great caution, to avoid undermining the security of existing development, particularly important to make sure any openings don't enter into vulnerable private space such as service yards or building boundaries where there is little or no surveillance.
- 4.6. RD2 – Given the nature of development and possible uses of buildings, particularly for lab space, it may be inappropriate for buildings to be open and permeable/publically accessible. This creates significant risk particularly where buildings may contain valuable or potentially dangerous holdings. I do not think this should be mandated as it may restrict the acceptable uses of buildings going forward, particularly if labs are proposed. Excessive permeability and a lack of secure lines makes the identification and apprehension of offenders far more difficult.

- 4.6. RD3 – Again I have fundamental concerns that servicing areas may permit pedestrian access, as these areas are often the most vulnerable areas of a building with numerous routes of access into buildings whilst having limited surveillance. Excessive and open permeability around private commercial buildings makes it impossible for the tenants to identify or challenge the presence of an offender, creating significant vulnerability and opportunities for criminal activity and hostile reconnaissance.
- 4.7 – GA12 – I have concerns that excessive permeability may undermine the security of the development, creating opportunities for crime and ASB, and providing multiple routes of escape for offenders making apprehension almost impossible. If this development is left highly permeable, it may become a significant target for criminal activity.
- 4.8 – illustration for points 1,4,5 (top right) – this image indicates private patio areas are open and directly accessible from the public realm, with no defensible space or standoff, which would not be acceptable.
- 4.11 – See above, I have fundamental concerns with the proposed parking strategy for this area of the site. Parking must be safe and secure, and must have high levels of surveillance and ownership from the dwellings it serves. Thinking about the government drive to reduce violence against women and girls, research shows that women feel and are most vulnerable to crime in the first and last section of their journey. Thinking of a lone female having to go from her car to her front door at night, the location and design of parking must ensure she feels safe.
- 4.11 – No guidance is given as to how the design and layout of this area will prevent unauthorised or inappropriate parking.
- 4.11 – Benches within private residential streets must be carefully considered, otherwise may be attractive to loitering and ASB particularly if they are lit in the evenings and at night.
- 4.12 – RB7 – This requirement is unclear and I cannot ascertain how allotments are to be enclosed and protected. Allotment sites are high risk targets for crime, antisocial behaviour and theft. As per my guidance below, they must be secured and enclosed to prevent unauthorised entry. Failing to adequately protect allotments and leaving them open to crime and damage creates a significant risk that after incidents, residents will abandon them, creating an underused and unattractive space that will be a crime and ASB generator.
- 4.14 – CS6 /CS7– I recommend adding a requirement for vehicle mitigation measures to prevent unauthorised vehicular incursion (including off road motorcycles).

I also provide the following general comments for the applicants' reference, 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".

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.

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.
- Windows should be included at ground floor level in elevations overlooking parking, including in curtilage parking, to maximise surveillance opportunities over parked vehicles and garages. 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. Where this is unavoidable, the dwelling boundary should be formed of 1.5m solid boundary with a 0.3m visually permeable topper, to aid surveillance over parking – Closeboard fencing with a trellis topper for example.
- Parking spaces with EV Charging should be well overlooked by surveillance, as this equipment is valuable and theft of EV charging cables and equipment is a significantly increasing crime threat.

Parking courts

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 courts.
- 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 and planting

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. 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. I recommend thorny species such as Pyracantha or Hawthorne are used where vulnerable side/rear elevations are easily accessible from the public realm, to enhance the physical protection of these boundaries.

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.

Apartment Blocks

I ask that any apartment blocks 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.

A security and access strategy must accompany any subsequent Reserved Matters applications demonstrating how unauthorised access will be prevented. This should include details relating to;

- the positioning of access controls (including bin and cycle storage areas) and visitor entry systems,
- attributes of both systems,
- Zoning/compartimentation provided to residents and visitors accessing the development.

To aid the applicant the attributes of any secure access system should include:

- Access to the building 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

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 residential bin stores should be robustly secured with a single leaf door to a minimum standard of LPS 1175 SR2 or equivalent.
- Garages should be of sufficient internal dimensions to accommodate a vehicle and sufficient cycles for the dwelling. Plots without a garage must have secure enclosed cycle storage provided within the rear garden of the plot.

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 unauthorised 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.

Allotments

- Allotment sites are particularly vulnerable to crime such as theft, ASB and criminal damage. It is important that allotments are designed and securely enclosed to prevent unauthorised entry. Allotments should be enclosed with a non-climbable boundary of a minimum 1.8m height to prevent unauthorised entry.
- Entry to allotments should be access controlled with lockable gates, and car/cycle parking should also be within a secure and lockable boundary to prevent opportunities for crime and ASB within the car park. Consideration should be given to providing secure communal storage facilities for tools and equipment, to reduce opportunities for theft.
- The entrance and parking for allotment sites should be well overlooked by surveillance from surrounding development.

Utility Meters

Unless smart meters are specified, 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.