

REF: 23/03073/HYBRID

Location: Phase 2 SW Bicester Kingsmere Parcel R East
Of Ludlow Road Bicester

05 December 2023

Holding Objection

Dear Linda,

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 2023 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 2023, 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'. Considering the likely vulnerability of residents of this development, prevention of crime should be of paramount importance. 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 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.

Building layout and design

I have concerns that there is no clear and easily identifiable primary entrance for the residential block, with several points of access that are closer and more convenient to use for those arriving in a vehicle or on bike.

The staffed reception area should provide security to the building by providing oversight of movement to and from the building, however due to its central location it is unable to fulfil this role. Considering the nature of this development and the vulnerabilities that will be present in its residents, it is of fundamental importance that building security is a primary consideration in the design, and an additional layer of defence is required. This is via the provision of a reception with staff able to oversee all movements to and from the residential element of the building. Not only does this reduce the opportunities and likelihood of offenders gaining access to the building, it also gives staff the opportunity to observe residents coming and going, which is important in a care setting where residents with dementia may be residing.

Failing to provide a single clear and easily identifiable entrance gives an intruder a legitimate excuse for being in an area that they should not, as they could claim they were trying to locate the reception area. The number of entrances and exits on the ground floor create excessive permeability, where opportunities for tailgating into the building unnoticed are increased, whilst the likelihood of apprehending an offender is reduced as they would have multiple options for escape.

The provision of publically accessible space increases these concerns, as you are inviting non-residents onto the site to make use of facilities such as the bistro, which as mentioned above potentially gives an offender a legitimate excuse for being where they shouldn't.

I have concerns that the deeply recessed and poorly lit alleyway which provides access to a lobby and the bin stores creates vulnerability, whereby an offender could make concealed entry attempts to gain access to the building. The residential dwelling with a window into this alleyway is left vulnerable also.

I recommend this development is provided an appropriately located and clearly identifiable reception to allow staff to monitor movements to and from the site. The reception should be made a prominent feature through the location, lighting, signage and fenestration surrounding the entrance. Excessive permeability must be avoided, and the reception staff should be able to see persons entering and exiting cores and private corridors once through the main entrance.

Residential Security

Unrestricted access to residential corridors 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 facilitated by on-site reception staff.

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)

Any private residential areas of the development must be secured and clearly signposted as such, particularly where they adjoin publically accessible facilities such as the bistro.

I also recommend the site is comprehensively covered with a CCTV system, the location and specification

of which should be informed by an operational requirements assessment, completed by a competent Suitably Qualified Security Specialist (SQSS).

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.