

**REF: 24/00245/OUT****Location: South Lodge, Fringford Road, Caversfield,  
Bicester, OX27 8TH**

21 February 2024

Dear Andrew,

Thank you for consulting me on the above application. 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. 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>. I highlight to the applicant that Thames Valley Police will seek to secure a condition requiring Secured by Design accreditation on the development hereby proposed.

Whilst I do not wish to outright object to this application, I highlight to the applicant that outline plans provided would be objectionable if submitted as the finalised design for reserved matters applications. 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. I also ask that suitable amendments to outline plans are made, which address my concerns highlighted below, prior to 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.

#### **Comments on outline plans provided**

- I have fundamental concerns with some of the proposed block structure, with excessive permeability creating spaces that are at high risk of crime and antisocial behaviour. Research by Prof Rachel Armitage has shown that “leaky cul-de-sacs”, such as seen to the east of this development, are up to 110% more likely to experience crime than a traditional “True” cul-de-sac.
- Narrow public alleyways between houses, such as seen in both the eastern and western block, are spaces that are extremely vulnerable to crime and ASB, and leave the dwellings either side at heightened risk of crime such as burglary. Narrow alleyways must be removed from the scheme, and excessive permeability must also be addressed (see general guidance below).
- Pedestrian and cycle routes (such as seen with the “historic track alignment”) must have vehicle mitigation measures to prevent unauthorised vehicular incursion at the point they meet the highway. Proposals risk vehicles and motorbikes/mopeds using these tracks, undermining community cohesion and creating tension. I note bollards are proposed, but there needs to be more effective vehicle mitigation in appropriate locations. The eastern block is again problematic, with a pedestrian/cycle path very vulnerable to cars being driven on it to drop shopping and children at the front door for example.
- Rear parking courts are very vulnerable to crime and ASB and must be avoided and the option of last resort. Where unavoidable, they must be fully secured to prevent unauthorised access and must not be excessively permeable with vulnerable alleyways such as seen in the northern parcel.

- The large areas of green open space within this development will be very vulnerable to unauthorised encampments or vehicle enabled antisocial behaviour. Comprehensive enclosure must be provided to prevent vehicles gaining access to the green space, utilising landscaping or physical barriers to prevent access.
- Several plots across the development will be at elevated risk of crime such as burglary, due to having vulnerable side or rear garden boundaries exposed and easily accessible. These boundaries are the entry point for the majority of residential boundaries and must be as fully secured as possible. Where they are exposed, they must be protected with defensible space and hostile planting, and should have high levels of surveillance over them.
- Areas of play must be overlooked by high levels of surveillance. I have concerns that the centrally located play space may have planting that compromises surveillance and increases the risk of crime and ASB. Tree planting must be of clear stemmed variety with a canopy maintained above 2m, and hedge planting must be maintained below 1m to facilitate clear sightlines.
- Plans must indicate how the vulnerable side/rear boundary of existing residential dwellings will be protected, as the proposals currently open up and expose these vulnerable boundaries to new public open space which does not currently exist for these properties. Point 18 “Open grassland” on the labelled illustrative masterplan is an area of concern, with vulnerable residential boundaries exposed, with accessible green space that has no clear ownership, function or purpose. SLOAPS must be avoided, with all green spaces having clear purpose.

I also provide the following general comments to ensure forthcoming applications meet the requirements of;

- The National Planning Policy Framework 2023 paragraph 96(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 135(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”.

### **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 should be directly adjacent to the property that they serve wherever possible.
- 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/compartmentation 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 SR1 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.

### **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.

### **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.