



Kevin Cox C1650

Designing Out Crime Officer

Thames Valley Police

Headquarters South

Oxford Road

Kidlington

OX5 2NX

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Reference: 25/01346/OUT

Location: Land North Of The Moors Kidlington

Dear Carlos,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the area. Whilst I do not object to this application at outline stage, due to all matters being reserved, I have fundamental concerns with illustrative plans provided within the DAS and other plans provided, that would be objectionable were they submitted for approval in their current form.

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.

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

- Traditional perimeter blocks are very beneficial in terms of reducing opportunities for crime and antisocial behaviour, where vulnerable side and rear garden boundaries can be fully enclosed within the block, reducing opportunities for crime and maximising active frontage and surveillance over the public realm. I have significant concerns that illustrative detailed block structures provide are not maximising this opportunity and instead some blocks are highly vulnerable to crime and antisocial behaviour.

- Block design and housing floorplans must ensure high levels of active frontage and surveillance over the public realm.
- I have concerns with the proposed road layouts, with long relatively straight roads running throughout the development that will be very vulnerable to speed and subsequent road safety concerns. All roads throughout the development must have physical design and engineering features, such as buildouts, chicanes and raised tables, that physically enforce the designed speed of the road.
- The large amount of green space throughout this development is welcomed, but does introduce risk in terms of potential unauthorised encampments. Landscaping design must ensure measures are taken to prevent unauthorised vehicular incursion onto green spaces, and forthcoming applications should detail this. This is of particular importance to the cricket pitches, which will be very vulnerable to unauthorised encampments. All areas of POS should be well overlooked by surveillance.
- It is important that the “Active travel Access” in the middle of the development is safe, well lit and has good forward visibility. It should maintain a minimum width of 3m along its entire length, and plans should demonstrate clear forward visibility with no blind turns or hiding places. Defensible planting and landscaping should be provided to protect the vulnerable side/rear boundaries of the existing dwellings either side of this route.
- The cricket pavilion floorplans include open and insecure bin storage alongside the boundary of the building. This is a concerning proposal due to the risk of crime and arson associated with insecure bin stores. Any bin stores should be secured and fully enclosed to prevent access to bins. Advice should be sought from the local fire authority regarding safe stand-off distances for any external bin storage.
- All corner turning plots must have dual aspect with ground floor active frontage maximising surveillance over the public realm.
- I have concerns with the proposed location of the mixed LEAP/NEAP/LAP located within the orchard area to the East, a significant distance from any dwellings. All areas of equipped play must be located where they are well overlooked directly by neighbouring residential development, to maximise surveillance and reduce the risk of crime and ASB occurring.
- East Gateway
 - I have significant concerns with outline illustrations within the DAS (Page 102) that indicate a parcel of development at greatly elevated risk of crime due to excessive permeability, and dwellings with all boundaries exposed and accessible from the public realm.
 - The alleyway running between plot 2 and 3 is objectionable, as it provides unnecessary permeability which will prove very beneficial to a criminal or those intent on antisocial behaviour.

- The parking in this area will be very vulnerable to crime due to the permeability which creates multiple opportunities for escape and a large imbalance of risk versus reward in favour of an offender.
- The courtyard gardens are a confusing space that lack ownership and identity, creating the risk of neighbour disputes and community tension. I do not understand the need for the benches within this space – it does not appear to be usable public open space and the benches are far more likely to be used for loitering and ASB than any legitimate reason.

This parcel needs to be reviewed to remove excessive permeability, create defined block structures that clearly communicate what is private and what is public realm, and provide safe and secure car parking areas. This layout would be objectionable if submitted for full approval as it is now.

- South Brook
 - I have concerns with the proposed rear courtyard parking demonstrated within the precedent study on page 111. This image does not represent good design, with vehicles parked to the rear of dwellings where they lack surveillance whilst being excessively permeable, increasing the risk of crime. The parking also unnecessarily exposes vulnerable side/rear gardens, increasing the risk of high harm crime such as burglary for these dwellings. The illustration also demonstrates vulnerable side/rear boundaries exposed and unprotected whilst lacking surveillance. Rear courtyard parking must not be used except where unavoidable – such as apartment blocks. In this instance the parking court should be fully enclosed and secure, with only one point of entry and exit. Were this submitted for full approval as is, it would be objectionable in terms of potential for crime.
- Wetland Gateway
 - The entrance to the site needs to include good levels of surveillance from residential dwellings, to reduce opportunities for crime and antisocial behaviour, and to ensure existing developments backing onto this proposal do not have vulnerable exposed rear boundaries.
 - Planting and landscaping must ensure protection of existing private boundaries.
 - Due to a lack of built up environment and being surrounded by open space, the first part of the road into the site may be vulnerable to speeding and pedestrian/cycle connectivity may not feel safe to use unless there is sufficient residential development providing surveillance along the route.
 - The landscape and design of the space around the entrance road must indicate the acceptable speeds for vehicles along this route.

I also provide the following general comments for the applicants attention, to ensure forthcoming applications meet the requirements of;

- The National Planning Policy Framework 2024 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 2024, 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/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 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.