



**Kevin Cox C1650**

Designing Out Crime Officer

**Thames Valley Police**

Headquarters South

Oxford Road

Kidlington

OX5 2NX

13 October 2025

**Reference: 25/01768/HYBRID**

**Location: Land At Graven Hill London Road Bicester**

### **Holding objection**

Dear Laura,

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the area. Having reviewed the submitted control documents, I have concerns that whilst crime prevention considerations have been mentioned in the proposed design code and DAS, these considerations have not filtered through to the detailed application for residential dwellings also submitted. I have concerns that in both the outline development proposals and also the detailed Stage 2 Phase 1 plans, there will be significant opportunities for crime to occur, and as such I am unable to support this application in its current form. I ask that amendments are made to the proposed Design Code, Design and Access Statement, and also Stage 2 Phase 1 plans to address the following comments prior to permission being granted.

I provide the following comments, to ensure forthcoming development meets the requirements of;

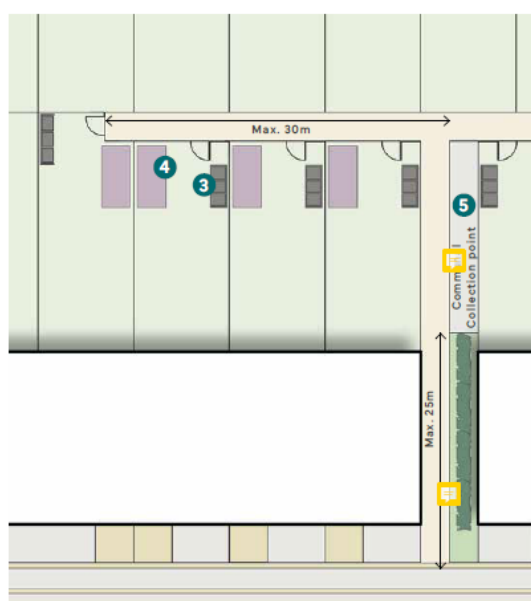
- The National Planning Policy Framework 2024 paragraph 96(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community 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".
- Policy ESD15 of the Cherwell Local Plan

### **Design Code**

I have concerns that the proposed design code is not sufficiently structured/written to ensure full compliance by future developers. Requirements for future developers are not clearly communicated, and language used for key coding elements appear to be

optional when they should be mandatory. I have attached an annotated copy of the design code highlighting my areas of concern. Given the nature of this development, it is imperative that key control documents such as the Design Code leave no room for ambiguity or misinterpretation, to avoid the mistakes seen in Phase 1 being repeated. In addition, there are requirements within the design code that are not acceptable from a crime prevention perspective, and these must be amended prior to permission being granted.

- Bin stores and bin collection points – The design code requires and permits bin stores which are fundamentally flawed in design from a crime prevention perspective. Shared bin collection points within what should be a secure perimeter block for example, completely undermines the security of all dwellings within the block by opening and permitting entry to what should be secure rear access routes. Any shared bin collection points must be in the public realm where they are well overlooked by surveillance but do not undermine the security of a residential block. The rear garden is the entry point for the vast majority of residential burglaries, and as such every effort must be taken to protect vulnerable side or rear garden boundaries. This is usually done by fully enclosing them within a back to back secure perimeter block arrangement. Where this is not possible, side or rear boundaries must be made inaccessible through the use of deep defensible space and planting to a depth of at least 1m, and they should also be directly overlooked by adjacent development to provide surveillance.



*Unacceptable design proposal, leaving dwellings at high risk of burglary*

- The street type coding excessively permits and promotes the use of rear parking courts on almost all street types, creating a risk that the entire development will be proliferated with rear parking courts, when they should be the option of absolute last resort. Rear parking courts undermine the security of perimeter blocks and are often seen to be problematic and susceptible to high levels of crime and antisocial behaviour. I ask that the design code is updated to make it mandatory for rear parking courts to only be used where absolutely necessary, and with justification as to why no other parking solution would work. In addition, the boundary treatments enclosing rear parking courts must not

hamper surveillance – 1.8m screen brick walls are required, whereas these may be detrimental to surveillance. Where vehicles are parked to the rear of the dwelling at the bottom of the garden, a 1.5m solid boundary with 0.3m visually permeable topper (trellis for example) should be used to allow surveillance from the dwelling over its parking.

- The design code permits Bollard lighting as the only lighting methodology for some streets. Bollard lighting is problematic in terms of potential for crime and the fear of crime, and must not be used in isolation. Bollard lighting does not provide a uniform level of light, and light is cast upwards creating shadowing on faces, reducing the ability for people to recognise faces, increasing the fear of crime. Bollard lighting is also very susceptible to accidental or deliberate damage such as criminal damage or vehicle collisions. Bollard lighting may be used to aid wayfinding, but in public spaces it must be used in conjunction with column lighting. All streets should be lit to the same standard as adopted highway.
- I have concerns that the proposed allotments appear to be intended to be open and publically accessible.
  - Allotment sites are particularly vulnerable to crime such as theft, ASB and criminal damage and 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. 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.
- We maintain fundamental concerns that the proposed road layouts throughout the development lend themselves to a site at significant risk of inappropriate vehicle speeds due to swathes of long and relatively straight roads. The provision of wide roads and street trees along the Tree lined avenue create additional separation of vehicles and pedestrians, further increasing the risk of speeding. The design code does not include any reference to speed limiting measures to be used, and these should be included prior to permission being granted. Where deviations in the route cannot be achieved, additional engineering measures such as raised tables and buildouts that create chicanes should be considered.

### **Outline parameter plans for entire site**

I have concerns that the outline parameter plans provided at outline stage for the development are far too detailed, as all matters for the outline Application are reserved. As such, at this stage it would be more appropriate for all parameter plans to be high level general plans without definitive details. It should not be considered that the acceptance of any illustrative documents indicates acceptance of the intricate detailed elements within – I have not reviewed them in detail for this reason. I ask that the submitted parameter plans are removed, and replaced with general high level plans omitting detailed design.

## **Stage 2 Phase 1 detailed application – Holding Objection**

### **Parking**

- The parking courts for both apartment blocks are at increased risk of crime and antisocial behaviour due to a lack of surveillance. There is no ground floor surveillance over the parking area from active rooms (Kitchens and living rooms), and the brick walls enclosing the parking courts prevent views into/out of the parking courts, creating cover for an offender to operate unnoticed. Whilst the entrance is partially overlooked, the parking bays and communal bin/cycle stores remain unobserved and vulnerable. The parking spaces and communal bin/cycle stores must be directly overlooked by surveillance from multiple dwellings at ground floor and higher levels. In addition, the enclosure of the parking courts where they face the street should be amended to ensure clear views across the parking areas– 1m high railings with hedge planting for example.
- The parking court serving plots 836.1-836.8 is excessively permeable with a vehicle and separate pedestrian entrance. Parking courts should only have one single point of access. Alternatively, this parking court should be electronically gated and access controlled to prevent unauthorised vehicular and pedestrian entry.

### **Surveillance**

- Surveillance is not being maximised in some areas of the development, with dead frontage and blank gables overlooking key public spaces. Corner plots such as plot 848, 853 and 855 do not positively address the street or provide surveillance over public areas, with large garden walls or blank gable ends preventing surveillance over the public realm. Where windows are provided they should be of a reasonable size to provide high levels of surveillance from the dwelling.

### **Rear access routes**

Boundary treatment plans do not include gate locations, which should be added prior to permission being granted. 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. Plans should be updated to bring gates forward and remove recesses for plots 837, 844.

### **Communal bin and cycle stores**

External shared bin and cycle stores should be fully enclosed and secured with access controls to prevent unauthorised access. They must be directly overlooked by surveillance to reduce opportunities for crime and ASB. Current plans indicate bin and cycle stores are very vulnerable to crime due to a lack of overlooking.

### **Apartment blocks**

- Apartment blocks must 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,

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)
- The communal green space adjacent to the ground floor apartment in block 846 lacks clear ownership and control – is this communal public space or a garden area for the flat overlooking it? There is a risk of neighbour disputes and community tension if green spaces do not have adequate demarcation as to what is public and what is private space. This flat is also left more vulnerable due to having easily accessible ground floor windows. Landscaping needs to clearly indicate who is entitled to use this space. In addition, any exposed ground floor windows must be provided protection through defensible space and ornamental planting to a depth of at least 1m, to provide demarcation and prevent easy access right up to windows.

### **Construction site security**

During the construction phase of this development, there is an elevated risk of crime, in particular theft offences. Construction sites across the Thames Valley Police area have been targeted for theft of tools and materials, and in the case of residential

development, we have also seen multiple targeted incidents of thefts of boilers from multiple dwellings at the same time, shortly after installation. As such, it is imperative that site security is considered equally as important as site safety. I ask that the Construction Management Plan for this development specifically considers site security, and I recommend the applicants consult the guidance provided by Secured by Design, to make sure all opportunities are taken to prevent crime from the outset. The guidance can be found here:

I ask that the following (or similarly worded) condition be placed upon any subsequent planning approval;

***Prior to commencement of development, a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. The CMP shall detail proposed site security measures, to include (but not be limited to):***

- ***Perimeter fencing and hoarding details;***
- ***Access control measures for personnel and vehicles;***
- ***Lighting, surveillance, and alarm provisions during construction;***
- ***Measures to prevent unauthorised access outside of working hours;***
- ***Security protocols for storage of tools, materials, and plant machinery.***

***The approved CMP, including the site security measures, shall be implemented in full for the duration of the construction works and adhered to at all times unless otherwise agreed in writing with the Local Planning Authority.***

***Reason:***

***To ensure the security of the site, protect public safety, and prevent crime and anti-social behaviour during the construction phase, in accordance with ESD15 of the Cherwell Local plan and the aims of the National Planning Policy Framework (NPPF).***

## **INFORMATIVE – FOR CONSIDERATION OF FUTURE APPLICATIONS**

I provide the following informative comments exclusively for the applicants' consideration when refining plans and documents for current and future applications.

### **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.

All residential dwellings should be provided lighting which illuminates the main entrance to the dwelling. This light should be photoelectric "Dusk till dawn" lighting, and motion sensing technology may be used to dim lighting output when no motion is present.

### **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.

### **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.