

REF: 15/01357/F

Location: Land East Of Larsen Road Heyford Park

27 October 2021

Thank you for consulting me on the above application. I have reviewed the submitted documents and crime statistics for the local area. I have significant concerns particularly regarding excessive permeability, and must unfortunately object to this application in its current form. I make the following comments to ensure that the forthcoming application meets 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".
- MHCLG's Planning Practice Guidance on 'Design', which states that; 'Although design is only part of the planning process it can affect a range of objectives... Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered: safe, connected and efficient streets... crime prevention... security measures... cohesive & vibrant neighbourhoods.'

In addition, I feel that the Design and Access Statement (DAS) does not adequately address crime and disorder as required by CABE's 'Design & Access Statements- How to write, read and use them'. This states that DAS' should; 'Demonstrate how development can create accessible and safe environments, including addressing crime and disorder and fear of crime'. 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>

Finally, if this application is approved, I ask that the following condition be placed upon the applicant:

Prior to commencement of development, details of a proposed external lighting scheme shall be submitted to the local planning authority. The scheme shall set out the steps that will be taken to ensure that external lighting, including zonal/security lighting promotes a secure environment and does not cause a nuisance to local residents.

To aid the applicant – it is important that bollard lighting is not used within this scheme. It does not provide sufficient light at the correct height to aid facial recognition, and does not reduce the fear of crime or deter antisocial behaviour. Additionally, they are often damaged by reversing vehicles leaving places unlit.

Excessive permeability

I have fundamental concerns that the current design is excessively permeable, which may cause significant problems in terms of crime and antisocial behaviour. Footpaths should lead to places that people need and

want to go, encouraging an appropriate level of usage throughout the day. Excessive permeability dilutes this usage, creating areas where there is insufficient movement and activity to protect the space from crime and antisocial behaviour. The excessive amount of footpaths and movement routes through this development also introduces anonymity, making it impossible for residents to identify and challenge those that should not be there, and giving offenders an excuse to be in places that they shouldn't.

- I have fundamental concerns that the footpath to the west of the development is located in an area with very poor surveillance, whilst exposing a significant number of vulnerable side and rear boundaries. These boundaries are the entry point for the majority of dwelling burglaries, and should wherever possible be protected within a secure perimeter block. I ask that this footpath is omitted from the scheme, and appropriate boundary treatments and defensible planting should be in place to protect the vulnerable boundaries.
- I have significant concerns that the footpath to the east of the development also provides excessive permeability. It allows access to a number of vulnerable side and rear boundaries, whilst also allowing pedestrian access to a number of private parking areas. These parking areas have insufficient defensible space between the footpath and boundaries/parking spaces leaving vehicles vulnerable.
- I have fundamental concerns that rear access routes throughout the development significantly undermine the security of the perimeter blocks, again exposing a significant number of vulnerable side and rear boundaries in space devoid of surveillance. I ask that all rear access routes should be as short as possible, ideally serving no more than 4 dwellings. Rear access routes must not run parallel or connect to others, as this creates unintentional/unauthorised routes through what should be a secure perimeter block. All rear access routes must be secured as close as possible to the front fascia of the building, and should be secured with a robust gate, fitted with self-closing hinges and a key lock which is operable from both sides.

Lighting

In relation to my request for condition 1 above, I am unable to locate a lighting plan within this development. It is imperative that this development is sufficiently lit to the standards of BS5489-1 2020 in order to deter crime and antisocial behaviour.

Recessed entrance

The entrance to plot 43 is vulnerable, as it is located within a narrow alleyway with very poor sightlines into and out of it. All entrance doors to buildings should be located where the occupant has clear sightlines to and from the property when arriving or leaving, to enable them to easily identify any potential threats or hazards. Doorways should not be recessed more than 600mm in order to facilitate clear sightlines. Other vulnerable entrances include plots 1, 52, 61, 63, 78 and 89 which are also located in areas not sufficiently overlooked.

Boundary Treatments

- There should be screen wall boundaries facing public realm to plots 26, 37, 44, 50, 51, 53, 54, 59, 60. Currently only close board fencing is shown.
- There is a lack of defensible space and planting to the vulnerable side and rear boundaries of plot 67 and 78. I ask that sufficient defensible space and planting to a depth of at least 1m is provided.
- Wherever private boundaries adjoin the public realm, there must be sufficient defensible space and planting to demarcate the transition from the public to the private realm. Defensible space and planting should be to a depth of at least 1m.

Treatment plant

I am unable to find any details relating to the treatment plant indicated alongside plot 79. It is unclear whether or not this plant is above or below ground, and what enclosures and boundaries are proposed. I ask that full plans for this are provided and approved in writing by the LPA prior to permission being granted.

LAP/LEAP

I am unable to find sufficient plans relating to the design and boundary treatments for the LAP/LEAP. Given the close proximity to the road and parking spaces, it is imperative that these facilities are suitably enclosed with a secure boundary to prevent children accidentally running into the road. It is equally as important to

ensure sufficient boundary treatments and landscaping features are provided to protect pedestrians and prevent accidental or deliberate vehicle incursion onto these facilities. I ask that full plans for the LEAP, including boundary treatments and vehicle mitigation measures are provided and approved in writing by the LPA prior to permission being granted.

I hope that you find my comments of assistance in determining the application and if you or the applicants have any queries relating to CPTED in the meantime, please do not hesitate to contact me.

Kind regards
Kevin Cox.