

From: Carmichael Ian
Sent: 10 July 2020 11:17
To: Rebekah Morgan
Cc: Planning
Subject: Planning ref: 16/00472/OUT (AMENDMENTS). S Grundon Services Ltd Merton Street Banbury OX16 4RN.

FAO: Rebekah Morgan

Dear Rebekah

Planning ref: 16/00472/OUT (AMENDMENTS). S Grundon Services Ltd Merton Street Banbury OX16 4RN.

Thank you for consulting me on the planning application above. I have reviewed the submitted documents and have liaised with Police colleagues, analysed crime data and visited the site previously.

It appears that very little has changed in relation to my previous comments on the application. This is disappointing given the size of the development and the amount of crime and anti-social behaviour (ASB) it could attract over its lifetime. In addition, the applicants have still failed to provide a commitment to achieving Secured by Design (SBD) accreditation, the minimum police recommended standard for security.

All of this is rather disappointing given that the applicants have had ample opportunity to discuss the proposals and my former advice (reproduced below for reference) with TVP, but have chosen not to.

Therefore, to encourage them to do so, and to ensure that the opportunity to design out crime is not missed, I request that the following (or a similarly worded) condition be placed upon any approval for this application;

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.

These comments are made on behalf of Thames Valley Police and relate to crime prevention design only. I hope that you find them of assistance in determining the application and if you or the applicants have any queries relating to crime prevention design in the meantime, please do not hesitate to contact me.

Regards

Ian Carmichael, CPDA Oxfordshire

Previous comments of 15.10.18:

FAO: Bob Duxbury

Dear Bob

Planning ref: 16/00472/OUT Proposed residential redevelopment for approximately 200 units. S Grundon Services Ltd Merton Street Banbury OX16 4RN.

Thank you for consulting me on the planning application above. I have liaised with Police colleagues, analysed crime data, reviewed the submitted documents and visited the site.

I do not wish to object to the proposals. However, I consider some aspects the design and layout to be problematic in crime prevention design terms and therefore feel that the development may not meet the requirements of;

- The National Planning Policy Framework 2018, Section 12 'Achieving well-designed places', point 127 (part 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'.
- HMCLG'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, 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 suggest the omission of a section on crime and disorder prevention is addressed at reserved matters.

In addition, I offer the following advice in the hope that it will assist the authority and applicants in creating a safer and more sustainable development, should outline approval be granted:

- I am concerned about the provision of undercroft parking. These features can attract anti-social behaviour (ASB) and make vehicles and people vulnerable. This design also creates a development with little or no active frontage to the street at ground level, which can have a negative effect on community interaction. I would prefer to see designs amended to omit the undercrofts or convert them to secure garages. If they must remain, they should be made secure, have appropriate lighting and be overlooked by active rooms of dwellings.
- Blocks A and G have vehicle routes under/through the block. This design can cause the same issues as the above and should be omitted. Again, if they must remain, they should have appropriate lighting and be overlooked by active rooms of dwellings.
- It is unclear from the plans supplied if any of the flat blocks have rooms of dwellings on the ground floor. Regardless, but especially if this is the case, there should be defensible space provided for each of the blocks. An area of at least 1m in depth should be provided to afford the occupants ownership of their private space and provide definition from public areas.
- I note that some flats have balconies. There should be no easily climbable access to these as this will make the blocks more vulnerable to burglary etc.
- The landscaping scheme should ensure that natural surveillance throughout the development and to/from dwellings is not compromised. I am also concerned that some trees and other features may impinge upon street lighting in future. Tree positions and final growth height/spread should be considered to avoid this. A holistic approach should be taken in relation to landscape and lighting and the police's Secured by Design (SBD) scheme guidance on both should be followed.

- The landscaping scheme and maintenance plan must ensure that areas of ambiguous ownership are not created. Measures to prevent vehicle intrusion onto any segregated pedestrian routes and public open spaces must also be provided.
- The design of play areas etc. require careful consideration in relation to proximity to housing, equipment selection (to define user group age etc.), boundary treatment, lighting and landscaping etc. The designs should promote ownership and enjoyment for all users as well as child safety, but they should also deter ASB. Locations must not isolate users and natural surveillance must be maintained.
- I feel there are too many pedestrian routes from the proposed development to the adjacent recreation ground. I believe two would be sufficient and designs of the bridges and an appropriate lighting plan for these routes should be provided prior to submission of a reserved matters application.
- I note that the south facing gable end elevations of the blocks appear to have no windows. Although I am sure the views of the rail lines are not very desirable, there should be oversight of the access road and open spaces at the southern edge of the development from active rooms of the dwellings. Active rooms include living rooms, kitchens and hall ways. Studies, bedrooms, bathrooms/toilets etc. are not considered active.
- Finally, I will have much to advise on at reserved matters in relation to the security of the blocks themselves. Physical security, access control, internal layout, delivery provision, refuse and cycle storage etc. all need careful consideration. I am of course available to advise the applicants on these aspects should outline approval be granted.
- I would also like to remind the applicants that Building Regulations Part Q requires them to install doors and windows that 'Resist unauthorised access to... new dwellings'. Advice on how to achieve this can be found in Building Regulations Approved Document Q and in SBD's New Homes Guide. The authority may wish to condition that the development incorporates the physical security principles/standards of SBD as this would ensure Part Q is also achieved.

The comments above are made on behalf of Thames Valley Police and relate to crime prevention design only. You may receive additional comments from TVP on other Policing issues regarding infrastructure etc. I hope that you find my comments of assistance in determining the application and if you or the applicants have any queries relating to crime prevention design in the meantime, please do not hesitate to contact me.

Regards

Ian Carmichael

Crime Prevention Design Advisor | Oxfordshire | Local Policing | Thames Valley Police