From: Carmichael Ian
Sent: 12 May 2020 14:46
To: Andrew Lewis <<u>Andrew.Lewis@Cherwell-DC.gov.uk</u>>
Cc: Planning <<u>Planning@Cherwell-DC.gov.uk</u>>
Subject: Planning ref: 18/00825/HYBRID. Heyford Park Camp Rd, Upper Heyford, OX25 5HD.

## **FAO: Andrew Lewis**

## Dear Andrew

## Planning ref: 18/00825/HYBRID. Heyford Park Camp Rd, Upper Heyford, OX25 5HD.

Thank you for consulting me on the planning application above. I apologise that Thames Valley Police did not provide advice on crime prevention design when these proposals were first registered in May 2018. Unfortunately, there were resourcing issues at the time that prevented this. As discussed, I now provide the following response in the hope that it will assist the authority and applicants as the proposals move forward.

I do not wish to object to the proposals at this time. However, I do believe that some aspects of the design and layout could be problematic in crime prevention design terms and therefore feel that the proposed 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'. And;
- 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, I am of the opinion 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'.

However, I do note that the above paragraph from the NPPF is quoted within the DAS and appreciate this inclusion. And, I appreciate that the applicants say they have been guided by Safer Places, Manual for Streets and 'ACPO New Homes' within the design process. This is encouraging. But, going forward I recommend that a commitment to achieving Secured by Design (SBD) accreditation wherever possible is provided within reserved matters application documents.

With this in mind, 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, applications shall be made for Secured by Design accreditation across 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 accreditations has been received by the authority.

Of course, if the authority feel it is more appropriate to attach conditions for individual parcels/uses at reserved matters I would also welcome this approach.

Either way, I refer the applicants to the suite of SBD guides at this stage as these will provide them with invaluable advice on the principles and standards of the scheme, which they should incorporate within any future applications/designs. SBD is a police initiative that helps to create safe, sustainable places by providing guidance on Crime Prevention Through Environmental Design (CPTED). The scheme has differing levels of accreditation relating to design and layout, and physical security. A level of accreditation can be achieved by nearly all types of development, even bespoke and refurbished structures. Details can be found at;

https://www.securedbydesign.com/guidance/design-guides

To further assist with the design process, I offer the following advice in the hope that it will help the authority and applicants in creating a safer and more sustainable development, should this application be approved:

- 'High permeability' is quoted in the DAS as a desirable design feature. Excessive permeability can be problematic and can aid criminal search behaviour, attract anti-social behaviour (ASB) and provide escape routes for offenders, among other issues. Levels of permeability should always be appropriate and never excessive. All routes should lead directly to where people want to go and serve a defined purpose. Permeability for permeability's sake should be avoided and I urge the applicants to consider layouts carefully as designs develop.
- The DAS also mentions that parking courts will form part of the parking provision. These features (as well as the coachway-type entrances to them and car ports that sometimes accompany them) make people, vehicles and the rear of properties more vulnerable. This is particularly true if they are located to the rear of housing where they are generally poorly lit and observed. The intention is to reduce the impact of vehicles on the street, but in reality parking courts are frequently abandoned by residents in favour of parking closer to the front of dwellings. This can lead to neighbour conflicts, parking on footways/verges and access problems for all, including emergency services. If these features must remain as part of the layout for some reason, SBD guidance on how to secure them must be followed. From the indicative plans supplied, it appears Parcel 21 would be particularly problematic in this respect.
- Care should be taken to ensure that appropriate and sustainable natural surveillance is provided throughout the proposals. Windows of active rooms should overlook frontages and parking and create buildings which 'Turn the corner'. The landscaping scheme should ensure that natural surveillance of routes and open spaces, and to/from buildings is not compromised. Trees must not impinge upon street lighting and tree and lamp column placement must avoid creating climbing aids in to rear gardens etc.
- Lighting of streets, footways and communal parking areas is vital in helping prevent crime and ASB, and in assisting police in the identification of offenders. It is also an important factor in reducing the fear of crime for all. Police recommended standards on uniformity and colour rendition should be provided throughout the development wherever possible. Information on lighting should be provided as soon as possible and not left until the detailed design stages. This will help avoid having to make it fit around other aspects of the designs later.
- Defensible space should be provided to all dwellings and other premises where appropriate/necessary. This can take many forms but must provide a stand-off area in any instance where private dwelling or other building fabric adjoins public/semi-public space.

- Details of the boundary treatments must be supplied for each of the varied uses/areas across the site. Some will have to be security rated and all will need to sufficiently protect the space/facility/dwelling they form the boundary of. Many treatments are likely to require toppings that help to prevent climbing.
- A holistic approach to landscape and lighting, and CCTV provision for various uses will be required to ensure none are compromised during the lifetime of the development.
- There should be provision of secure refuse, mobility scooter and cycle storage to SBD standards accompanying the differing types of development across the site (where appropriate). With regards to the latter two, it should be noted that open shelters/storage areas are only suitable for visitor facilities.
- Access control and security strategies, that include provision of systems that meet recommended standards, must be provided in relation to most of the non-residential uses. Although these should not be publicly available, sufficient information must be provided to the authority on each individual system/use prior to approval of any subsequent planning applications. In addition, access control specification for any flats within the residential elements must follow SBD guidelines.
- Utility meters must be installed where access can be gained without entering private spaces or where access to them is managed by authorised personnel only. Alternatively, smart meters could be provided.
- Provision for post and parcel delivery within communal residential buildings must also be via one of the three SBD recommended methods listed in the New Homes guide.
- Finally, I would like to remind the applicants that Building Regulations Part Q will require 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. Achievement of SBD accreditation would also ensure Part Q is satisfied.

The comments above 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

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