

## Rachel Tibbetts

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**From:** Carmichael Ian <Ian.Carmichael@thamesvalley.pnn.police.uk>  
**Sent:** 09 July 2020 07:30  
**To:** Linda Griffiths  
**Cc:** Planning  
**Subject:** Planning ref: 19/00895/REM (FURTHER AMENDMENTS). OS Parcels 6741 and 5426 West of Cricket Field and North of Wykham Lane Bodicote.

**FAO: Linda Griffiths**

Dear Linda

**Planning ref: 19/00895/REM (FURTHER AMENDMENTS). OS Parcels 6741 and 5426 West of Cricket Field and North of Wykham Lane Bodicote.**

Thank you for consulting me on the further amendments to the planning application above. I have reviewed the submitted documents, having previously analysed crime data and visited the site.

I appreciate that the applicants have provided more information on Secured by Design (SBD) principles within their amended Design and Access Statement (DAS). However, unsurprisingly they have still failed to provide a commitment to achieving SBD accreditation. In addition, regardless of the principles mentioned and the mitigations proposed, the layout remains poor in crime prevention design terms due to the high number of unsecured rear parking courts. The justifications for my view on this aspect have been provided previously (see below) and I will not waste time repeating them.

I will simply ask the authority to take said advice into account when considering the application for approval in the knowledge that police have recommended that it should not be approved with this layout unless significant mitigations are made. In addition, my request for a condition regarding SBD accreditation still stands in any case, as it is clear that the applicants will not pursue this unless forced to.

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, CPDA Oxfordshire

**Previous comments of 09/04/20:**

**FAO: Linda Griffiths**

Dear Linda

**Planning ref: 19/01037/REM (FURTHER AMENDMENTS). OS Parcels 6741 and 5426 West of Cricket Field and North of Wykham Lane Bodicote.**

Thank you for consulting me on the amendments to the planning application above. I have reviewed the submitted documents, having previously analysed crime data and visited the site.

Once again, I find myself disappointed with the applicant's attitude toward police advice, which has largely been ignored since my original comments on the site of 20/08/19. The recent amendments have actually worsened the proposals from a crime prevention design perspective and increased the likelihood of residents and visitors becoming victims of crime and anti-social behaviour (ASB);

- The introduction of more rear parking areas and larger parking courts (all unsecured) will make additional vehicles, properties and people more vulnerable. I recommend that the previous layout of solid perimeter blocks in a back to back arrangement be reinstated.
- Some parking spaces adjacent to the houses they serve are still not overlooked from an active room. The simple addition of a window on some house types would remedy this.
- Despite there now being more parking courts making additional rear gardens of dwellings vulnerable, advice on the specification of boundary treatments has not been taken on board.
- In addition, some rear garden gates have still not been moved forward to the front building line when they easily could be.
- Advice relating to car ports also appears to have been disregarded.
- There are still no lighting plans or details of utility meter provision supplied. Given the applicants disregard for crime prevention and community safety, I have no faith that when plans are supplied they will be adequate.
- And, there is still no commitment to, or even mention of a willingness to provide the minimum standards recommended by police for security of dwellings. I would have expected a responsible developer to at least state that Secured by Design (SBD) accreditation will be sought. I also would have expected the applicants to have contacted me directly regarding my previous advice as they originally promised, but they have not.

In short, I have some serious concerns regarding the applicants approach to crime prevention and community safety and recommend that the authority does not approve this application until the matters above have been addressed.

I also repeat my request for a condition to be attached to any future approval as described in my previous correspondence on this application (reproduced below for reference).

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, CPDA Oxfordshire

**Previous comments of 30.12.19:**

**FAO: Linda Griffiths**

Dear Linda

**Planning ref: 19/01037/REM (AMENDMENTS). OS Parcels 6741 and 5426 West of Cricket Field and North of Wykham Lane Bodicote.**

Thank you for consulting me on the amendments to the planning application above. I have reviewed the submitted documents.

It appears that nothing has changed in relation to my previous comments on the application. This is disappointing given the size of the development. I am also surprised that there is still no commitment to achieving Secured by Design (SBD) accreditation, and also that the applicants have still not contacted me as promised in their Design and Access Statement (DAS). I hope that the applicants will now address both of these matters.

One difference I do note from the amended documents, but am rather confused by is the addition of car ports. I reviewed the plans for these features but could not find the indicated location on any of the site plans. I assume that this is a mistake and that car ports will not form part of these proposals. However, if they do (and amended site plans are supplied showing their location), they should be lit using a switched photoelectric cell unit, be overlooked from active rooms of adjacent properties and be gated. Ideally, I would prefer to see garages provided instead because car ports can be problematic as they are unsecured, create hiding places and make vehicles, property and people vulnerable.

Finally, I reproduce my previous comments below in the hope that the applicants will still address them and I also repeat my request to the authority to condition the achievement of SBD accreditation in the hope that this will ensure the applicants take crime prevention and community safety more seriously as the proposals move forward.

Regards

Ian Carmichael, TVP CPDA Oxfordshire.

### **Previous comments of 20/08/19:**

#### **FAO: Linda Griffiths**

Dear Linda

**Planning ref: 19/01037/REM. OS Parcels 6741 and 5426 West of Cricket Field and North of Wykham Lane Bodicote.**

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

Firstly, I appreciate that the applicants have stated within their Design and Access Statement (DAS) that the development 'Incorporates SBD [Secured by Design] principles' and that the police Architectural Liaison Officer (an old title for my role) will be consulted. However, I still have some concerns in relation to community safety/crime prevention design. If these are not addressed I 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'. 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.'

To ensure that the development does follow SBD principles, that I am consulted as promised, and so 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 accreditation has been received by the authority.

With the above in mind, 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 approval be granted:

- The landscaping scheme should ensure that natural surveillance throughout the development and to/from units is not compromised. I am concerned that some trees/hedges may impinge upon this in future. Tree positions and final growth height/spread should be carefully considered and hedge heights should be maintained at no more than 1m. I also recommend that there is no hedge provided at the southern LAP/LEAP as this will remove the chance of it not being maintained at an appropriate height. It is also proposed that some hedges will be maintained at 1.8m. This is not acceptable in situations where it could impinge upon natural surveillance.
- A holistic approach should also be taken in relation to landscape and lighting to ensure the former does not impinge upon the latter. SBD lighting standards should be incorporated. I am particularly concerned about tree-lined streets, the segregated sections of pedestrian footways and where footways enter/leave the site.
- The landscaping scheme and maintenance plan require careful consideration to ensure that areas of ambiguous ownership are not created. Measures to prevent vehicle intrusion on to any segregated pedestrian routes and public open spaces must also be provided.
- I am concerned that there appears to be no lighting provided for the 'Private drives'. Lighting of streets, footways and communal parking areas is vital in helping prevent crime and anti-social behaviour, and 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 adhered to whenever possible.
- Some plots do not have windows of active rooms overlooking their parking. Windows should be provided wherever possible to enhance ownership and natural surveillance. Active rooms include living rooms, kitchens and hall ways. Studies, bedrooms, bathrooms/toilets etc. are not considered active.
- Where boundary treatments of private rear gardens abut public or semi-private space they should incorporate features that make them difficult to climb; trellis on fences, angled or rounded copings on walls etc. All access gates to rear gardens (including communal ones) should be; robust, of the same height as boundary treatments, self-closing, have anti-lift hinges and be key operated from both sides. Also, some gates to rear gardens are not provided as close to the front building line as possible, which creates problematic recesses. I would like to see them brought forward wherever possible. And, I note that the DAS states that 'Hit and miss' fencing will be used to provide oversight of parking to the rear of properties. However, the Enclosure Plan shows no such fencing. The proposed visually permeable treatment should be used where possible and appropriate.
- I could find no detail on where utility meters will be located. They should not be placed within dwellings or secure rear gardens as this assists criminal search behaviour and can increase instances of distraction burglary etc. Meters should be placed where access can be gained by authorised personnel without entering private spaces. Alternatively, smart meters which can be read remotely should be used.
- Finally, I would like to take this opportunity 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 the SBD New Homes guide at: <https://www.securedbydesign.com/guidance/design-guides>

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

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