

Rachel Tibbetts

From: Carmichael Ian <Ian.Carmichael@thamesvalley.pnn.police.uk>
Sent: 22 April 2020 13:39
To: Samantha Taylor
Cc: Planning
Subject: Planning ref: 19/01047/OUT (AMENDMENTS). Land North East of Oxford Rd West of Oxford Canal and East of Bankside Banbury.

FAO: Samantha Taylor

Dear Samantha

Planning ref: 19/01047/OUT (AMENDMENTS). Land North East of Oxford Rd West of Oxford Canal and East of Bankside Banbury.

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

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. I appreciate that some aspects of crime prevention design have been covered within the Design and Access Statement (DAS), but am rather confused by some of the wording; for example, in the Placemaking section it states that; 'Plots and buildings are safe and secure with any opportunities for crime and anti-social behaviour designed out'. How can this be when parking courts, car ports and undercrofts are proposed, which are all features likely to attract crime and ASB!

Also, I will be interested to see how the plots and buildings will be 'secure' when the applicants have still failed to provide a commitment to achieving Secured by Design (SBD) accreditation, the minimum police recommended standard for security.

In relation to car ports and undercrofts, of course I recommend that they are not used. However, if some have to remain for some reason, 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/undercrofts are unsecure, create hiding places and make vehicles, property and people vulnerable.

In addition, I have to query the DAS (again in the Placemaking section) where it says that back to back housing blocks with public fronts and private rears will be provided. How can this be the case if perimeter blocks are puncture by parking courts, which invariably exposed rear and side boundaries of properties to the public realm? Incidentally, rear and side boundaries are where the vast majority of burglary intrusion takes place.

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, CPDA Oxfordshire.

Previous comments of 19.07.19:

FAO: Samantha Taylor

Dear Samantha

Planning ref: 19/01047/OUT. Land North East of Oxford Rd West of Oxford Canal and East of Bankside Banbury.

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

I do not wish to object to the proposals. However, I feel that some aspects of the design and layout could 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'. 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 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 prior to any outline 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>

Therefore, to ensure that this is the case and 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.

In addition to the above request, 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:

- Permeability is frequently mentioned throughout the DAS as a desirable quality within development. Although this is true, inappropriately high levels of permeability are likely to attract crime/anti-social behaviour (ASB), aid criminal search behaviour and provide escape routes for offenders. All routes should lead directly to where people want to go, serve a defined purpose and follow SBD guidance on their design. Permeability for permeability's sake should be avoided.
- The landscaping scheme should ensure that natural surveillance throughout the development and to/from dwellings is not compromised. Where appropriate, shrubs and hedges should have a final growth height of no more than 1m and tree canopies should encroach no lower than 2m so that an open aspect is maintained. In addition, a holistic approach should be taken in relation to landscape and lighting so the latter is not compromised. Tree positions and final growth height/spread should be considered to avoid this for the lifetime of the development.
- The detailed landscaping scheme and maintenance plan must ensure that areas of ambiguous ownership are not created. And, buffer strips adjacent to the existing and future housing will need special consideration in this respect to ensure they do not become hidden areas where ASB etc. takes place.
- Measures to prevent vehicle intrusion on to any segregated pedestrian routes and public open spaces must be provided.
- The design of play areas and other recreational facilities 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 would also suggest that on a scheme of this size, sufficient provision for youth should form part of the proposals. This is likely to help reduce the misuse of facilities intended for younger children.

- Parking courts are proposed as part of the parking strategy for the development. Although I appreciate they may be necessary to serve flats etc. it should be recognised that these features make vehicles and the rear of properties vulnerable. They also often attract ASB. The intention is to reduce the impact of vehicles on the street, but in reality courts are frequently abandoned by residents in favour of parking in front of dwellings. This can lead to neighbour conflicts, parking on footways and access problems for all, including emergency services. They should only be used where absolutely necessary. Where they must remain, the number and size should be kept to a minimum and they should be made as secure as possible. Again, SBD provides guidance on how to achieve this.
- In addition to the above, car ports and undercroft parking is proposed. Again, these features can be problematic as they are unsecured, create hiding places and make vehicles, property and people vulnerable. I would prefer to see secure garages provided.
- Lighting of streets, footways and communal parking areas must be to SBD recommended standards. For reference, low level lighting such as bollards should be avoided in almost all situations as it creates pooling of light, shadowing and hiding places. Pedestrian scale columns and building mounted units are a far more appropriate solutions.

In addition to the above, the applicants should be aware that any reserved matters application relating to this development would need to consider;

- Appropriate and sustainable natural surveillance to/from the dwellings and across the site, including the use of buildings that 'turn the corner' and have active rooms overlooking the parking that serves them.
- Adequate lighting for internal communal areas and all entrance points to any flatted units to police recommended standards.
- Provision of defensible space where all private dwelling's building fabric adjoins public/semi-public space.
- Installation of appropriate height boundary treatments with toppings that help to prevent climbing and secure access points.
- Provision of secure refuse and cycle storage to SBD standards.
- An access control and security strategy for flats that includes provision of a system that meets recommended standards.
- Utility meters installed where access can be gained without entering private spaces or where access to them is managed by authorised personnel only.
- Post and parcel delivery within any flat blocks via one of the three SBD recommended methods.

Finally, although the physical security standards of dwellings would be ensured by the attachment of the requested condition, 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' regardless. Advice on how to achieve this can be found in Building Regulations Approved Document Q and in SBD's New Homes Guide.

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

Mobile: 07967 055125

Email: ian.carmichael@thamesvalley.pnn.police.uk

Thame Police Base, Wenman Rd, Thame, Oxon, OX9 3RT.

Thames Valley Police currently use the Microsoft Office 2013 suite of applications. Please be aware of this if you intend to include an attachment with your email. This communication contains information which is confidential and may also be privileged. Any views or opinions expressed are those of the originator and not necessarily those of Thames Valley Police. It is for the exclusive use of the addressee(s). If you are not the intended recipient(s) please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error please forward a copy to: informationsecurity@thamesvalley.pnn.police.uk and to the sender. Please then delete the e-mail and destroy any copies of it. Thank you.
