



Crime Prevention Through Environmental Design Planning Response

Site Address – Land To The Rear Of 89 To123 Englishcombe Lane Southdown Bath Bath And North East Somerset	App. Ref – 24/01168/REG03
Development description –. The erection of 16 no. supported living units (Use Class C3(b)) with associated communal hub (to include ancillary carers accommodation), access, landscaping and ancillary works	Response Date – 09/05/2024
Crime Prevention Design Advisor – Jason Price - Local Support Team – Bath & North East Somerset	
Summary Response	
No Objection or comments	
No Objection – Subject to comments	
Object in principle	
Not acceptable in its current format	X

Detailed Response
I am a Police, Designing Out Crime officer with a responsibility for Crime Prevention Through Environmental Design (CPTED) projects within the County of B&NES. As a Constabulary we consider planning applications to identify design vulnerabilities with the potential to facilitate crime, anti-social behaviour, disorder and the fear of crime throughout the life of the development. We give advice on how this may be addressed using recognised Crime Prevention Through Environmental Design principles and guidance as set out in Secured By Design document Homes 2023. Section 17 of the Crime and Disorder Act 1998 requires local authorities to consider the crime and disorder implications of all their activities and functions and do all that they reasonably can to reduce these problems. Designing out crime and designing in community safety through planning can be a vital tool in fulfilling this duty. Paragraphs 96 and 135 of the National Planning Policy Framework December 2023 <u>require</u> crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 101, 112,114,115,116,123 and 124 also <u>require</u> the creation of safe environments within the context of the appropriate section. BANES Core Strategy, part 1 of the Local Plan, Objective 6 ‘Plan for development that promotes health and well-being’ states; “enabling more opportunities for people to lead healthier lifestyles and have a

greater sense of well-being through facilitating active modes of travel, encouraging social interaction and designing high quality, safe streets and spaces.

Para 6.35 states; 'High quality design (including architecture, urban design and landscape architecture), has a significant impact on quality of life. It influences safety and security.

The guidance notes for design codes published by the Ministry of Housing, Communities & Local Government, P3i Secured By design, para 143 states;

'Neighbourhoods need to be designed to make people feel safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design which includes guidance for housing.'

This development is for 16 Local Authority supported living units. Para, 144 of the guidance notes further states, 'Insecure places can disproportionately affect some of the groups with protected characteristics. Local authorities will need to take this into account when devising and implementing design principles, having regard to the Public Sector Equality Duty, under the Equality Act 2010, which includes the need to have due regard to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by the Act.

My comments are consistent with the planning legislation and cross referenced to Secured By Design guidance and explanations (numbers in brackets below refer to SBD sections, follow the link to read).

[HOMES GUIDE 2023 web.pdf \(securedbydesign.com\)](https://www.securedbydesign.com/HOMES_GUIDE_2023_web.pdf)

I note that there appears to be a general lack of consideration documented that would show that safety and security have been adequately considered in order to comply with the above legislation.

The supporting documents do not appear to include a robust statement detailing how this would be achieved.

I understand that this supported living development will cater for residents with Autistic Spectrum Disorder and note the unique requirements and design of the living space.

I note para 6.1 of the Landscape strategy refers to Private and defensible space and I would strongly recommend that this is delivered.

A lack of defensible space has the potential for occupants to feel insecure in their own homes.

Each residents needs will vary but as well as improving security, establishing defensible space would help to reinforce personal space and foster a feeling of security.

SBD HOMES 2023 states; '

8.1 Vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, well used and should not undermine the defensible space of neighbourhoods. Design features can help to identify the acceptable routes through a development, thereby encouraging their use, and in doing so enhance the feeling of safety. Where it is desirable to limit access/use to residents and their legitimate visitors, features such as rumble strips, change of road surface (by colour or texture), pillars, brick piers or narrowing of the carriageway may be used. This helps to define the defensible space, psychologically giving the impression that the area beyond is private.

8.2 Defensible space has the simple aim of designing the physical environment in a way which enables the resident to control the areas around their home. This is achieved by organising all space in such a way that residents may exercise a degree of control over the activities that take place there.

The 'Engawa' porches whilst creating a place to sit and meet also create hiding places. Secured by Design, Homes 2023 states;

'Doorsets that are hidden from public view, typically side or back doors, should not be recessed more than 600mm. This requirement is not applicable to doorsets located in wide recesses that are located within public view (Note 23.27). However, no doorset should be recessed by more than 1000mm.

Note 23.27: For the purposes of this guidance document a doorset is considered to be within 'public view' when it can be seen from the street.

Should it be the applicants intent to apply for a Secured By Design Award the development would have to comply with the above paragraphs.

The circular paths around the development are meandering and lead on to extensive woodland where the development boundary appears extremely porous.

I would ask that clear plans be provided detailing how the secure perimeter will be achieved so as to prevent entry from the adjacent woodland area.

The general arrangement plan refers to proposed fencing to demarcate the site boundary and para 4.6.2 and 6.6.2 of the planning statement refers to secure fencing.

Lack of a robust perimeter treatment could facilitate crime such as burglary and anti-social behaviour including strangers using the pathways or establishing desire lines to travel through the development which is of increased concern when considering the potential vulnerability of residents.

The lighting around the path ways is provided by low level bollard lighting, which is not sufficient to illuminate faces for identification purposes.

This style of lighting does not work to support CCTV.

I note that at this stage neither a management plan, nor CCTV plan have been submitted which would also help me to assess this development.

Regarding Secure Cycle parking, para 4.5.12 of the Transport plan states;

'Cycle parking provision is set out in Table 7. Cycle parking would be secure, sheltered, and sited at each of the two clusters with good natural surveillance and improved convenience when compared with vehicular parking.

To address this statement, of the two clusters, cluster 1 location appears capable of being viewed from only one dwelling and next to bushes which will require maintaining so as not to further obscure the provision.

The cluster two provision, contrary to the transport plan, has no direct surveillance, it is adjacent to two gable ends.

I can find no detail on how external secure cycle parking will be achieved. I would refer the applicant to para 64 of SBD Homes 2023 and would ask for further information on this provision.

As stated in the above paragraph 4.5.12 the car park is remote and on the approach to the development and has no line of sight view from any building that would improve ownership, there is no tie in with the development.

It is located off of the access road and although there is lighting provision, as I have stated there are no opportunities for surveillance.

The remote and secluded location lends its self to anti-social activity and crime, vehicles parked here will be vulnerable to attack.

A CCTV plan has not been submitted but even if there was provision it is likely it would not be

monitored and may only be of use post event should crime or anti-social behaviour occur and should not be relied upon to bridge the CPTED gap.

I would strongly suggest that the location of the car park is moved to avoid these issues.

I am concerned, that in the areas I have set out above, on the information available, that at this time this application does not yet meet the safety and security requirements of the National Planning Policy Framework or the B&NES Core Strategy.

Secured by Design (SBD) is a Police owned organisation which operates a national accreditation scheme on behalf of UK police for design, products or services that have met recognised security standards.

If there are any questions concerning these comments then please feel free to contact me.

Jason Price