

OCC Street Design Guide

Thames Valley Police Crime Prevention Design Advisor Feedback

June 2023

Thank you for engaging with me, and for consulting Thames Valley Police in the amendments to be made to the Oxfordshire County Council street design guide. I understand OCC is seeking to lead the way in terms of sustainability and reducing the carbon footprint of the county, with a target of reaching net zero. Through the use of this street design guide, OCC seeks to influence and change the way new developments are created and designed, putting a far higher emphasis on walking and cycling as sustainable modes of travel. With this desire comes unique challenges in terms of safety and security.

It will come as no surprise that a pedestrian walking or cycling is more likely to become a target for crime than if they were locked within a moving car whilst completing their journey. Traditionally, we have always promoted the principle of “primary routes”, where pedestrians, vehicles and building frontages come together to form a route with high levels of surveillance and activity at all times, which naturally provides a level of protection to those using the primary route.

Where the desire to remove vehicles from the street is being pushed forward, this element of activity and surveillance is removed. It is therefore important to ensure that other design considerations are taken to ensure all movement corridors are safe and welcoming for all, and opportunities for crime and antisocial behaviour to occur are minimised.

Another challenge is ensuring new and innovative design, such as “futureproofed” adaptable car parking facilities are designed to the highest sustainability standards without compromising security. For example, I have recently encountered proposed developments where designers concentrated residential parking away from homes to clear the street scene of cars and prioritise pedestrians. In their quest to innovate and meet sustainability goals, they have inadvertently overlooked the risk of crime and designed isolated, exposed and vulnerable parking courts. Another example is where buildings are proposed to be fitted with Air Source Heat Pumps instead of traditional fossil fuel boilers, but they are located externally at the front of the dwelling where they restrict surveillance and create a climbing aid. It is entirely possible to meet both sustainability and crime prevention requirements within developmental design, and Thames Valley Police will always strive to support developers in achieving the highest quality designs that satisfy both sustainability and crime prevention goals.

Our Chief Constable has committed to working in partnership to develop innovative solutions to problems, and I agree with him that the police are not the only agency responsible for preventing crime. It is not only public sector agencies that are responsible for tackling crime; the private sector are on the front line and must also take an active role. My purpose as a Crime Prevention Design Advisor (or Designing Out Crime officer as we are now more commonly known), focusses on exactly that. It is my job to work with partner agencies such as local planning authorities, and private sector enterprises such as housing developers, to provide advice and guidance to help them tackle crime before it has even happened. Crime prevention through good environmental design is proven to be one of the most effective methods of reducing crime – stopping it from happening in the first place by creating developments which are safe, secure and welcoming for the public, whilst being hostile and uncomfortable places for a criminal to operate.

To support me in this work, I am backed by Secured by Design – the police-owned security initiative whose sole aim is to reduce crime and help people live more safely. Whilst Building Regulations part Q mandates the requirement for certain physical security measures in buildings to resist attack, this is just the tip of the iceberg when it comes to prevention. There are a significant number of other measures that can be taken to prevent crime happening in the first place. Through decades of experience and academic research, and working hand in hand with security experts across the country and beyond, Secured by Design has developed expert detailed design guides. These guides cover everything from physical security standards of buildings, to proven crime prevention measures such as Crime Prevention through Environmental Design (CPTED), where features are incorporated into the built environment to prevent crime happening in the first place.

Secured by Design also have a developers award scheme, whereby providers of new build or refurbishment developments are able to receive certification for achieving a certain standard of security across their development. This certification scheme not only ensures new developments are safe, welcoming places for people to live and work, but also provides the occupants or users of a development with the reassurance that every opportunity has been taken to prevent crime happening. Even better, the award scheme is free of cost to apply and receive the award.

When considering how we go about reducing crime and meeting our goals of preventing crime and antisocial behaviour from occurring, I think there is more work to be done to maximise the opportunities we have, particularly in new developments. As a non-statutory consultee within the planning system, the police are somewhat limited in the impact they can have on a development once it has reached application stage. That is why it is vitally important that we have the support of the local authority and planning departments, who oversee the design of new developments. It is vital for us to achieve our aim in preventing crime that developers are required to consider their designs in terms of prevention of crime from the very outset, and I would encourage them to consult the guidance and engage with police at the earliest, pre-application stage for all new developments.

Where the police can have an impact and achieve results within planning is by the use of conditions placed upon planning approvals. We have seen success in some areas where planning authorities are supportive of the Secured by Design scheme, and are willing to condition the requirement for developments to achieve Secured by Design accreditation. We also see great success where local plans and development guides require developers to take crime prevention seriously, as compliance with these policy documents and guidance can be directly quoted and required in order for planning permission to be obtained. I would appeal to the county council to support us in this vital work, to ensure all new build developments are not only well designed and sustainable, but safe too.

I have reviewed the first edition of the OCC Street Design Guide, issued in July 2021, and provide the following advice and guidance to the council for consideration when drafting the second edition. I welcome further engagement as this document evolves and would be happy to offer any guidance and advice as required.

In addition to the points below, I would also like to take this opportunity to highlight the importance of the impending protect duty legislation, “Martyn’s Law”, which will place a legal requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

Current guide feedback

<u>Page</u>	<u>Section</u>	<u>Comment</u>	<u>Suggestion</u>
5	Photo montage	The bottom centre photo shows white houses with blank gable ends which we seek to avoid due to reduced surveillance. Car parked on footpath also	Replace photograph with alternative showing good design in terms of surveillance, and where street scene is clear of obstruction.
8	Purpose of the guide – middle paragraph	The guidance I have provided is backed by Secured by Design, which it would be beneficial to acknowledge for further reading.	Recommend adding Secured by Design guidance documents as an additional point of reference
9	High Quality Streets	No mention of “Safe”	Amend top point to read “Efficient, safe, resilient and made to last”
18	1.5 – Principles	It would be beneficial for safety and security to be one of the guiding principles included in this list	Recommend an addition such as below: Principles: Safety and security: What is high quality? Creating streets and spaces that feel safe, and where opportunities for crime and antisocial behaviour have been designed out from the outset.
19	Collaboration from the outset	Whilst not necessarily required to be in the guide, I strongly recommend developers and designers are encouraged to engage and collaborate with the police at the earliest, pre-application stage to ensure Crime Prevention Through Environmental Design is appropriately addressed within developments. Achieving change and positive outcomes is much easier if we are able to influence designs far earlier in the process than when it is finally submitted for planning. It saves both TVP, the developers and the planning authority time too.	
21	Filtered permeability	Recommend acknowledging safety in this passage as a catch all.	Walking and cycling routes must be direct, Convenient, safe and well designed.

28	Strategic example	It is unclear what the point regarding “Verge or adopted visitor parking” is pointing to – does not appear to indicate a space.	Clarification of where the visitor parking space would be acceptable in the example drawing provided.
29	Shared Surface	Informal squares/junctions can be problematic in terms of inappropriate parking where the hard and soft landscaping scheme does not effectively demarcate where vehicles should and should not be parking, often leading to vehicles being parked blocking footpaths or cycleways. An example being the informal shared surface Birmingham Drive junction at Kingsbrook Aylesbury, which regularly sees vehicles parked blocking footpaths: Birmingham Dr - Google Maps	Recommend a point is added requiring clear definition through hard and soft landscaping scheme to prevent unauthorised parking and obstruction of footpaths.
30	Tertiary Streets	Reference is made to providing minimal private threshold / personalisation strip in front of dwellings, however any easily accessible ground floor windows are more vulnerable to unauthorised/opportunistic entry attempts if left unprotected.	Secured by Design recommends a defensible planted buffer to a depth of at least 1m to provide suitable standoff and protection to vulnerable easily accessible ground floor windows.
30	Urban mews – parking	Casual parking forms such as coach house carports or garages can be more vulnerable to crime and antisocial behaviour due to being enclosed/covered reducing surveillance over parked vehicles. I have seen many developments come forward recently where mews streets are designed with swathes of coach houses and garages, or where parts of the mews street run along the rear boundary of other plots. This has been to the detriment of security because there is little to no active frontage on the street because of the parking.	Recommend a point is added requiring a mix of parking methods and a requirement for dwellings with active frontage fronting onto mews to provide sufficient overlooking of mews at ground floor level.
33 33 34	Bicycle parking introduction Residential Apartments communal storage	Secured by design offer comprehensive guidance on cycle parking security, for residential, commercial and public parking. Cycle theft is one of the most prevalent crimes reported to Thames Valley Police, particularly in Oxford City, and it is important that local crime statistics and hotspots are considered when specifying the type and certification of cycle storage facilities.	Include Secured by Design, Homes 2023 (Section 17, 32, 57 and 64 (if required)) as reference material. I strongly recommend requiring developers to comply with the standards set out in Secured by Design when designing

			<p>cycle parking facilities.</p> <p>Consultation with the police regarding local crime statistics should also be a requirement.</p>
35	Employment	<p>As above, the guidance in the streets guide is quite loose but SBD can provide more detailed advice tailored to different requirements.</p>	<p>Include Secured by Design, Commercial (Paragraph 20.9, 46) as reference material. I strongly recommend requiring developers to comply with the standards set out in Secured by Design when designing cycle parking facilities.</p>
35	Town and village centres	<p>Secured by design offers comprehensive guidance regarding the required specification of cycle stores to reduce crime in public spaces, and has produced a detailed guide specifically for this; 05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf (securedbydesign.com)</p>	<p>Recommend adding a point requiring cycle storage to be designed and certificated in accordance with the requirements of Secured by Design, include the linked document as reference material.</p>
36	Parking Background	<p>I have briefly engaged with Cllr Mallon regarding the parking standards guide mentioned here, and would be very happy to be further involved the development and refinement of this guide.</p>	
36	Resources bubble	<p>Secured by design guides provide detailed guidance on car parking for all schemes from residential to commercial.</p>	<p>Include Secured by Design as a point of reference in the list.</p>
37	Innovative approach	<p>I recommend developers are directed to consider crime and security/safety when designing new and innovative parking solutions. Innovation should be encouraged but must still follow the principles of CPTED to reduce opportunities for crime. I've raised concerns with recent innovative design proposals, such as the Hill Rise development in Woodstock. Parking barns are proposed which remove cars from the street scene, however they introduce additional crime and safety concerns and we've had to undergo numerous rounds of consultation and negotiation to negate these concerns. It's of particular</p>	<p>I recommend an additional sentence is added to this section, acknowledging innovation must also be safe secure.</p>

		<p>concern where new parking solutions are some distance from residential dwellings, as this raises additional safety fears for residents particularly at night or in the winter months when natural light is reduced. Particularly considering violence against women and girls, adding the requirement to walk some distance from their car to their home adds an element of risk that would not be there were they able to park closer to their home.</p>	
39	On plot, reference to post war developments	<p>Whilst I agree this precedent was set by post war developments, it is also human nature that drives the desire to park as close to home as possible. Particularly considering challenges such as loading and unloading children or a week's worth of grocery shopping, it is far more convenient and easier to complete these tasks where the vehicle is directly outside the home. People also feel safer where they exit their vehicle and are able to enter the home straight away, more so than if they have to walk a distance from the car park to their front door, especially at night. It is seen very frequently, even on new developments, that where parking is remote from the dwelling, it may be abandoned by the resident in favour of parking on-street outside their home, even if this causes obstruction issues. It should also be noted that the most appropriate guardian for a vehicle against crime is its owner. People are far less likely to intervene or report an incident they witness if it doesn't directly involve them.</p>	
40	Rear Parking Courts	<p>Completely agree with the statements made on this page. I would also add that parking courts are very often left unlit, which creates significant opportunities for crime and antisocial behaviour. Tandem bays within parking courts are a frequently encountered design issue to try and cram as many vehicles into a space as possible, to the detriment of good design and ease of use. Another issue raised in some recent planning applications I have dealt with relates to the access into parking courts where it is achieved via a FOG/Drive through arrangement. A requirement for security is to gate and secure these access routes, to the front of the drive through to but some concern has been raised by developers that this would mean obstruction of the highway whilst residents wait for the gates to open. I personally do not see this being a significant issue, indeed the very short period of time that a vehicle may be waiting for the gate to</p>	<p>I suggest adding a requirement that any rear parking court should comply with the requirements of Secured by Design, be secure with only one point of entry and exit and be protected with a gate. I would ask that it is mandated that rear parking courts must be well lit (N.B. bollard lighting as the only source of light is not supported by Secured by design). Tandem parking</p>

		<p>open may provide incidental traffic calming. I seek OCC's thoughts on this issue.</p>	<p>should be avoided in parking courts. I also ask for clarification on OCC's position regarding acceptability of gated drive throughs – or whether it would need to be a requirement that buildings are set back from the road a sufficient distance to allow a vehicle to pull off the road and wait a brief moment for the gate to open.</p>
40	On street unallocated	<p>Unallocated parking directly outside a dwelling can cause neighbour disputes and community tension, particularly where the space is directly outside a window or door to the home. For example if I were to park my work van in the unallocated space directly outside a neighbours kitchen window, obstructing their views and perceived light entering their dwelling, a dispute may arise.</p>	<p>Unallocated parking must be carefully located on street to reduce opportunities for disputes and tension to occur. Unallocated parking should not undermine the overall parking strategy, particularly where innovative solutions are proposed to address parking issues. For example, residents are far more likely to park in an unallocated visitor bay nearer to their home than their allocated bay further away. Where unallocated spaces are directly outside dwellings, they risk appearing to belong to that dwelling or having the resident attempt to assert ownership over the space. As such any unallocated visitor</p>

			parking should be clearly distinguished from allocated resident parking.
41	Unallocated parking	The limited access street image used here shows a concerning design with poor surveillance and hiding places created by the wall to the right	Recommend replacing this image with a street well overlooked by surveillance. I note the BedZed development has been used for reference here; brief research indicates this scheme has resulted in displaced parking by residents in surrounding areas as a result.
42.	French parking squares	I am unfamiliar with this concept and am unable to find reference to it through online research. The image on page 41 appears to show vehicles parked on the street and the pavement? See also my comment regarding page 29 above.	Recommend more detail regarding this proposal such as illustrative plans showing what would be acceptable.
47	Landscaping	Trees and hedges can impact surveillance and reduce sightlines across streets unless appropriately maintained. They can also create areas of shadowing/pooling of light that are beneficial to crime and antisocial behaviour if not considerably located.	I recommend a point is added requiring trees to be of a clear stemmed variety with a canopy above 2m minimum. A point stating that landscaping plans must be designed holistically with lighting schemes to avoid shadowing or pooling of light would also be beneficial here.
49	Street lighting	Street lighting has a significant role to play in reducing opportunities for crime and the fear of crime on new and existing developments. I have been involved with the OCC Street lighting policy programme steering group, but am unsure at what stage this programme has now reached. Secured by Design has produced a comprehensive guide to lighting which I would recommend is referenced here for reference.	I recommend the SBD lighting guide is highlighted as essential reference material.

		https://www.securedbydesign.com/images/safer-streets/pdf/pcpi_lightning_guide_web.pdf	
52	EV Charging	There is an emerging trend of theft of EV charger cables, and developers should be encouraged to ensure any residential EV chargers are installed with concealed power cables to the EV charging point. Publically accessible EV charging stations should be located in areas that are well lit and benefit from high levels of natural surveillance to deter opportunistic thefts.	Recommend an additional point is added regarding security of EV charging points.
53	Recycling and refuse storage	Insecure bins can be used to commission an offence such as by providing a climbing aid into a back garden, or as a target for crime such as arson.	I recommend a point is added that states that Bin Collection Points must not be located against a residential boundary such as a garden fence or wall, to prevent bins being used as climbing aids. Also, where bins are stored to the front of the property or in publically accessible locations, they must be stored within locked storage cupboards.
53	Recycling and refuse storage	Rear access routes are also high risk areas for crime and ASB as they provide easy access to vulnerable side and rear boundaries.	I recommend an additional sentence is added; "Convolutd access... be avoided. Where they are unavoidable they must be secured with a lockable gate in line with the frontage of dwellings, and must serve no more than 4 dwellings".