

03 January 2024

**Oxford City Council Local Plan 2040**

Thank you for consulting me on the draft Local Plan 2040. I have reviewed the proposals and made the following observations, which I would be very grateful of inclusion prior to the sign off of the final plan.

**Secured by Design**

Thames Valley Police strongly advocates the guidance provided by Secured by Design – a national crime prevention initiative owned by the police. The requirements and recommendations within the guidance are based upon sound research findings that have proven to deliver significant crime reductions and cost efficiency savings for a wide range of stakeholders including local authorities, housing associations, landlords, residents and the police service. New developments that follow this guidance are proven to see a reduction in crime of up to 87%, and an up to 61% reduction in crime for redevelopments. Developers should be required to consult this guidance and ensure that the advice is fully incorporated into their scheme. Whilst there is a small section relating to secured by design within the draft local plan, I feel opportunities are being missed to maximise the build quality requirements of new developments in terms of designing out crime.

**Comments on draft local plan**

<b>Page</b>	<b>Section</b>	<b>Comment</b>
19	1.37	Suggest adding a reference to safe; “Development should create strong, safe, sustainable cohesive and inclusive communities to support Oxford
21	Policy S2	Good design is a fundamental element in the prevention of crime and ensuring public safety. New developments designed with the principles of crime prevention and the guidance of police and Secured by Design in mind see up to 87% less crime than existing developments. Ensuring new developments have good design in terms of reducing opportunities for crime therefore contributes to an overall reduction in crime, which has a direct positive impact on the lives of residents and visitors, and a diffusion of benefits is seen in other areas too. I recommend a point is added within the design code guidance requiring crime to be a factor.
123	6.27	I ask that a point is added to the second from last sentence; “The most obvious of these linkages are sustainable design and construction, safety, health and well-being impacts, and management of natural resources.
124	6.29	I have concerns that the wording in paragraph 6.29 is somewhat diluted and carries less weight than the wording of point 6.11 in the local plan 2036. I ask that the requirement for developments to be built to meet the requirements of Secured by Design is maintained, with wording updated to reflect the old local plan.
134	6.54/ 6.55	Shared gardens for individual maisonettes and flats have the potential to cause conflict should the privacy and amenity of one resident be compromised by the use of the garden space of another. Ideally all units should have dedicated private space, however where this is not possible it is important that the ground floor flat is not negatively impacted in terms of privacy or noise where garden space must be shared. Rear access routes are very vulnerable to crime and ASB, and facilitate high harm crime such as burglary unless well designed. In order to reduce the risk of crime and ASB, garden

		access routes must be as short as possible, serve no more than 4 homes, and must be secured in line with the building line. Garden access routes must not undermine the security of dwellings by creating recessed areas that expose vulnerable boundaries in areas lacking surveillance. They should not run in parallel or create unofficial “rat runs” through the development.
137	6.61	Add a point “Examples of good practice can be found in the Parking and bike parking technical advice note <b>and Secure by Design</b> ”.
137	Policy HD15	I ask that a further point is added requiring bike and bin storage to be secure. (see comment below ref page 325).
154	Policy C7	Cycle theft is the most prevalent crime type in Oxford City, and as such the local plan should robustly enforce the requirement for developers to consider cycle store security, as well as ease of access and convenience. The latest local plan is a golden opportunity to improve cycle parking facilities and encourage an uptake of cycling, where people may currently be put off due to the risk of theft. Crime such as cycle theft is a real and increasing threat to the council’s ambitions for net zero, and as such every effort must be made to prevent theft. In all of the documents referenced by the planning authority and county council, I am unable to locate any requirements for the physical security standards of cycle storage. Simply including the word “secure” in the policy is not sufficient as this may be interpreted and manipulated by developers, and carries no real meaning or weight. With an exponential increase in thefts committed using battery powered handheld tools, it is imperative that the infrastructure for securing cycles, particularly in public places, is strong enough to resist attack. This is particularly important where the increase in the use of ebikes is envisaged, as these high-value cycles are high value and extremely desirable targets for thieves, who will go to great lengths even in front of people in broad daylight to steal. I ask that a point is added to this policy, requiring cycle parking to conform to police approved specifications as laid out in Secured by Design. Reference must also be made to the Secured by Design cycle parking security standards document, which can be found here. – <a href="#">05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf (securedbydesign.com)</a>
157/ 323	Policy C8/ M. 3	I have concerns that this policy requires vehicle parking to be located “to minimise the circulation of vehicles around the site”. It is unclear exactly what is meant by this, and does not take into consideration crime and pedestrian safety concerns. Whilst reducing cars in developments is a requirement, parking must remain safe and carefully located to ensure high levels of surveillance that reduce opportunities for crime. I fear the wording of this requirement will lead developers to create large parking courts in isolated locations at the periphery of developments, where surveillance may be reduced and vehicles left at risk of crime. With a strong focus on the reduction of incidents of violence against women and girls, the first and last mile of a journey is the most important and also the most high-risk in terms of incidents occurring. Therefore, any parking facilities provided must permit safe and convenient travel from wherever a vehicle is parked to the final destination of the person. To ensure the protection of people and reduce opportunities for crime, the police and other agencies strongly advocate that parking is designed to be safe, well overlooked and close to the homes that it serves. Parking areas must have capable and willing guardians overlooking them, to identify, challenge and report crime and incidents. Generally, the only willing and capable guardians to complete this role are the owners of the vehicles that are parked there. Therefore, any parking must be located in order that is overlooked by the plots that it serves. Landscaping around parking areas must also be designed to ensure surveillance is not compromised – the use of trees with a clear stem up to 2m and hedge planting maintained below 1m is important.
323	M.2	In the first point on this page, I suggest amending as follows; “...how could perceptions of safety change at night or in bad weather and how can street design be used to improve these (e.g. lighting, <b>surveillance</b> , shade and shelter)”.
324	Public Spaces	I ask that another question is added, such as; <b>Do public spaces avoid undermining the security of developments?</b> Do public spaces ensure they do not expose vulnerable residential side/rear boundaries? Do all external spaces such as parks have sufficient

		landscaping and boundary treatments to provide clear standoff and demarcation from private spaces?
324	P.2	I ask that a question is added to this point such as “Are all external public spaces sufficiently lit so that people can see and be seen?”
325	I.2	I recommend an additional bullet point is added to this section. Façade detail, particularly when considering windows, is a very important security consideration alongside the visual benefits features such as windows bring. Blank elevations that overlook the public realm must be avoided – not only are they unsightly and detract from a positive and active street scene, they facilitate crime by reducing surveillance and provide a blank canvas for crime and antisocial behaviour such as graffiti. It is important for street active frontage and maximising surveillance that any corner-turning plot is dual aspect with windows on both sides overlooking the turn.
325	I.3	I am concerned that developers are being persuaded not to locate cycle storage to the front of buildings, in contradiction to both county council and wider national guidance. Cycle theft is the most significant crime type in Oxford, and every opportunity must be taken to reduce opportunities for theft. Locating visitor cycle storage outside the main entrance to buildings where there are high levels of activity, footfall and therefore surveillance is proven to reduce theft. Requiring cycle parking to be away from the front of buildings may lead to hidden or poorly located cycle storage where there is insufficient surveillance, and theft of cycles may increase, increasing crime, the fear of crime, and stopping people choosing sustainable travel such as cycling if they do not have adequate safe and secure storage.
353	Vehicular Parking Standards	I have concerns that policy C8 allows for unallocated parking for residential dwellings. Particularly in the next few years, where car ownership is still high and people are transitioning to new ways of living and commuting, there is a significant risk of residents owning more vehicles than they have spaces to park them. Providing unallocated parking creates a “free for all”, with significant risk of neighbour disputes, community tension and inappropriate parking on the highway with associated obstruction and safety risks. I ask that unallocated parking is removed from this policy, with all residential dwellings being allocated parking. This is the only way that enables effective monitoring and management of parking across sites with low numbers of parking spaces.

The above comments are made on behalf of Thames Valley Police and relate to crime prevention design only. I hope that you find these comments of assistance. If you have any queries relating to crime prevention design, please do not hesitate to contact myself.

Kind regards  
Kevin Cox.