



Site Address – Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD		App. Ref – 22/01878/P
Development description – Application for Outline Planning Permission with some matters reserved - Development of up to 260 new residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. Approval sought for access with all other matters reserved. (Major)		Response Date – 01/06/2022
Crime Prevention Design Advisor – Jason Price - Local Support Team – Bristol		
Summary Response		
Pre-application comments		X
No Objection or comments		
No Objection – Subject to comments		
Object in principle		
Not acceptable in its current format		

Detailed Response																																	
<p>I am a Police Crime Prevention Initiatives (PCPI) qualified Crime Prevention Design Advisor (CPDA) registered on the national network of Designing out crime officers.</p> <p>I am responsible for Crime Prevention Through Environmental Design (CPTED) projects within the City of Bristol. As a Constabulary we offer advice and guidance on how the built environment can influence crime and disorder.</p> <p>My comments are consistent with current planning legislation as detailed at the bottom of this document and cross referenced to Secured By Design, Homes 2019 which gives full guidance and explanations (link at the bottom of this document).</p> <p>Selected 12-month crime statistics for the Brislington East, Policing area.</p> <table> <tr> <th>Type</th><th>Incident Count</th></tr> <tr> <td>ASB</td><td>484</td></tr> <tr> <td>Violence Against The Person</td><td>363</td></tr> <tr> <td>Public Order Offences</td><td>115</td></tr> <tr> <td>Arson and Criminal Damage</td><td>91</td></tr> <tr> <td>Vehicle Offences</td><td>88</td></tr> <tr> <td>Theft</td><td>76</td></tr> <tr> <td>Burglary</td><td>61*</td></tr> <tr> <td>Sexual Offences</td><td>28</td></tr> <tr> <td>Miscellaneous Crimes Against Society</td><td>19</td></tr> <tr> <td>Robbery</td><td>18</td></tr> <tr> <td>Theft of a pedal cycle</td><td>17</td></tr> <tr> <td>Drug Offences</td><td>10</td></tr> <tr> <td>Fraud</td><td>7</td></tr> <tr> <td>Crime Related Incident</td><td>5</td></tr> <tr> <td>Possession of Weapons</td><td>4</td></tr> </table>		Type	Incident Count	ASB	484	Violence Against The Person	363	Public Order Offences	115	Arson and Criminal Damage	91	Vehicle Offences	88	Theft	76	Burglary	61*	Sexual Offences	28	Miscellaneous Crimes Against Society	19	Robbery	18	Theft of a pedal cycle	17	Drug Offences	10	Fraud	7	Crime Related Incident	5	Possession of Weapons	4
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* Note; Approximately 40% of Burglaries in Bristol over a 12 month period mention Bicycles, the theft of which is a major contributory factor.

Current Local Policing priority- theft of motorcycles.

Secured By Design Awards

I note that the developer may consider applying for a Secured by Design award which would demonstrate that crime and disorder have been appropriately considered. To maximize opportunities for qualifying with the awards criteria, compliance should be considered at an early stage.

More information on awards and how to apply for them can be found in para's 3 to 5 of SBD Homes 2019 (link below).

Crime during the construction phase

Theft from building sites where security has not been adequately considered continues to occur.

We recommend that security should be in place prior and during the construction phase. This should include robust perimeter fencing of the site and a monitored alarm system (by a company or individual who can provide a response) for site cabins and those structures facilitating the storage of materials and fuel.

For more information see para 6 advisory note, Homes 2019.

I will submit detailed comments when a full application is made. In the meantime, I have tried to provide guidance on the information available and specifically around key areas where the supporting documents and crime pattern information suggests there should be heightened consideration.

In order to fully comply with the safety and security requirements of the National Planning Policy Framework and the Bristol Core Strategy, as detailed at the foot of this document, the applicant is advised to consider the below comments.

Should the applicant wish to discuss any aspect of SBD or Designing Out Crime I would be please to assist.

I am unable to give specific comments at this early stage as there is insufficient detail, my general thoughts include; permeability, paths, external lighting, vehicle parking, cycle/bin storage, as follows;

Permeability

Over the last 40 years South Bristol has continually experienced issues with motorcycles, often stolen, being illegally ridden across open spaces such as nearby Eastwood Farm and ground bordering the river Avon, Stockwood Tip and Hengrove Park.

The anti-social use is often not confined to open space and will regularly be through urban areas such as the 'Inns Court', estate and other residential areas where there is excessive permeability .

I have consulted with the local Policing team, the green space which this application seeks to develop has been associated with the nuisance use of motorcycles.

When considering access and movement, the cornerstone of 'Safer Places,' previously published by the Home office, on behalf of the Office of the deputy Prime minister, is that 'safety and security are essential to successful well designed sustainable communities.

It states, *"The success and failure of a place as part of a sustainable community is influenced by the nature and quality of its connections, particularly to local and wider services and amenities. Too few connections can undermine vitality, too many-and especially too many under-used or poorly thought-out connections can increase the opportunity to commit crime. The right level and type of access, resulting*

in places that are both well connected and secure, is achieved through careful and creative design based upon local assessment”.

Although no longer published the guidance remains valid and still underpins crime prevention through environmental design.

Crime is more likely to occur if;

- pedestrian routes are poorly lit, indirect and away from traffic,
- streets, footpaths and alleyways provide access to the rear of buildings,
- there are several ways in and out of an area- providing escape routes for criminal activity,

SBD Homes 2019 para 8.3 states that “*whilst it is accepted that through routes will be included, the designer must ensure that the security of the development is not compromised by excessive permeability, for instance allowing the criminal access to the rear or side boundaries of dwellings or by providing too many segregated footpaths.*

Neighbourhood Permeability is one of the community level design features most reliably linked to crime rates.

Para 6 of the Design and Access Statement relating to public spaces states;

Public spaces will be safe, pedestrian friendly and designed for a diverse population.

Due to the level of open/public space I would strongly advise the applicant consults further with this office to discuss how safe public spaces will be achieved.

Cul-de-sacs

Regarding the proposed road layout, Cul-de-sacs that are short in length and not linked by footpaths can be very safe environments in which residents benefit from lower crime. (8.5).

Such a design makes it undesirable to commit crime by reducing escape routes.

By denying through access, the opportunity to ride motorcycles or other mechanically propelled vehicles such as scooters through the street so as to cause a danger or nuisance to residents is avoided.

However, research shows that the benefit of a cul-de-sac can be compromised if one or more of the following undesirable features exists:

- backing onto open land, railway lines, canal towpaths etc.;
- are very deep (long);
- linked to one another by footpaths (leaky cul-de-sacs);
- poorly lit

Cul-de-sacs that connect by footpaths to other parts of a development, often referred to as ‘leaky cul-de-sacs’, experience the highest levels of crime when compared to crime levels within a true cul-de-sac. Crime in this kind of design can be 110% higher than crime in a true cul-de-sac and therefore should be avoided. (8.7).

Footpath design

Rear access footpaths should be avoided wherever possible. Where they are deemed necessary, they must be secured and serve the minimum of properties.(para 13).

The use of unsecured rear access foot paths to parking courts must be avoided as they design in unnecessary vulnerability.

Where a segregated footpath is unavoidable, for example a public right of way, an ancient field path or heritage route, designers should consider making the footpath a focus of the development and ensure that they are:

- as straight as possible;
- wide;
- well lit (see paragraphs 8.19 to 8.21);
- devoid of potential hiding places;
- overlooked by surrounding buildings and activities;
- well maintained to enable natural surveillance along the path and its borders. (8.10).

Physical barriers may also have to be put in place where 'desire' lines (unsanctioned direct routes) place users in danger, such as at busy road junctions. It is important that the user has good visibility along the route of the footpath.

The footpath should be as much 'designed' as the buildings.(8.11).

Where isolated footpaths are unavoidable, and where space permits, they should be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles).

If footpaths are designated as an emergency access route, they must be wide enough to allow the passage of emergency and service vehicles and have lockable barriers.(8.12).

In general, planting next to a footpath should be arranged with the lowest growing specimens adjacent to the path, and larger shrubs and trees planted towards the rear. Planting immediately abutting the path should be avoided as shrubs and trees may grow over the path, creating pinch points, places of concealment and unnecessary maintenance.(8.14).

For more information including information on seating next to footpaths and potential for vandalism and ASB, see para 8 of Homes 2019, 'Layout of roads and footpaths', by following the link at the bottom of this document.

Lighting of footpaths

If a footpath is to be used 24 hours a day, it should have all the required attributes as listed at paragraph 8.10 and be lit in accordance with BS 5489-1:2020.

If the footpath does not have these attributes, then its use should be deterred during the hours of darkness by not installing lighting.(8.19)

It is important that the landscape architect and lighting designer's co-ordinate their plans to avoid conflict between lighting and tree canopies. It is advisable that trees are planted at least 5 metres away from any light source. Please also see paragraph 18 regarding the technical requirements for public lighting, 'dark sky' policies and light pollution.(8.20)

Bollard lighting should not be used in any sort of safety or security capacity and is primarily designed for route marking. It will only serve to adequately illuminate knee level, it does not support CCTV and gives no assistance with identification or helping individuals to assess safe routes.

Vehicle parking

Where communal car parking areas are necessary, they should be in small groups, close and adjacent to homes and must be within view of the active rooms within these homes (Note 55.1).

It may be necessary to provide additional windows to facilitate overlooking of the parking facility.

- From the illustrative master plan, potentially there may be several parking courts through Brislington heights, Brislington Green and Bonville Glade that in the absence of detailed plans appear to have a level of disconnection and a lack of sufficient surveillance which could lead to ASB and criminality.

Lighting to parking courts must be at the levels recommended by BS 5489-1:2020.

Note 55.1: The word 'active' in this sense means rooms in building elevations from which there is direct and regular visual connection between the room and the street or parking court. Such visual connection can be expected from rooms such as kitchens and living rooms, but not from more private rooms, such as bedrooms and bathrooms.

Cycle/bin storage

As I have stated, cycle theft is a major driver when considering motives to commit burglary.

External cycle storage must be located near to the building line and not, 'tucked out of the way', or located toward the edge of back gardens. Both scenarios imply a lack of surveillance and increase vulnerability significantly.

The level of cycle crime suggests that stores must be enclosed, non-visually permeable (which provides the opportunity for thieves to select targets), robust and provide anchor points to lock both the frame and wheels.

Communal storage must have robust access control either mechanical or electrical and be well lit.

Full advice on cycle and bin stores can be found in para's 56 and 57 of Homes 2019.

We are assisting the local authority is redrafting their document "A guide to cycle parking 2005". Much of this information is available using the following links;

[05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf \(securedbydesign.com\)](https://www.securedbydesign.com/05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf)

[Bike Security - How to Protect Your Bike \(securedbydesign.com\)](https://www.securedbydesign.com/bike-security-how-to-protect-your-bike)

<https://www.soldsecure.com/category/bicycle>

External bin stores as can be seen in the DAS para 8.5 examples could present climbing aids to first floor windows.

Windows

All easily accessible windows(Note 22.2a),including easily accessible roof lights and roof windows, shall be certificated to one of the following standards:

- PAS 24:2016 (Note 22.2b);
- STS 204 Issue 6:2016 (Note 22.2c);
- LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 22.2d);
- LPS 1175 Issue 8:2018 Security Rating 1/A1;
- STS 202 Issue 7:2016 Burglary Rating 1;
- LPS 2081 Issue 1.1:2016 Security Rating A.

Note 22.2a: Easily accessible is defined within Approved Document Q Appendix A as:

- A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony, or
- A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

For full advice on security standards for doors and windows see SBD para's 21 and 22.

Paragraphs 92, 97 and 130 of the National Planning Policy Framework July 2021 require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 106, 110, 112, and 119 also require the creation of safe environments within the context of the appropriate section.

The Bristol Development Framework Core Strategy (adopted June 2011) states that one of the overarching issues for ensuring a sustainable future is reducing the opportunity for crime.

Bristol Local Plan – Site Allocations and Development Management Policies – (Adopted July 2014) section DM28: Public Realm states that Development should create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction. Section 4 adds that development will be expected to: Reduce crime and fear of crime by creating a well-surveyed public realm that is well managed and cared for;

Secured by Design (SBD) operates an accreditation scheme on behalf of the UK police for products or services that have met recognised security standards. Such products or services must be capable of deterring or preventing crime and are known as being of a 'Police Preferred Specification'.

Further guidance can be found by following the below link;

https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_NEW_version_2.pdf

Police Preferred Specification ensures that products have been:

- Independently tested to a relevant security standard
- Fully certified by an independent third-party, United Kingdom Accreditation Service (UKAS) certification body

Or

- Tested and certified by an approved body such as Sold Secure or Thatcham.

If these comments are adequately addressed, they will provide compliance with the security requirements of the relevant UK Building Regulations, providing a safe and secure environment, increase tenant satisfaction and occupancy, reduce maintenance and crime and Anti-social Behaviour.

Jason Price

