Communities and Partnerships Department

 South Wales Police

 Cowbridge Road,

 Bridgend.

 11th October 2023

Planning Officer in Charge Angharad Hobbs,

Vale of Glamorgan Planning Department,

Docks Offices.

Barry

Dear MS Hobbs,

**RE: PLANNING APPLICATION NUMBER 2023/00948/FUL 46 UNITS AT SANDY LANE, YSTRADOWEN, COWBRIDGE, VALE OF GLAMORGAN**

South Wales Police have considered the above application and would ask that the following recommendations are taken into consideration. We would welcome working with the applicant to achieve Secured By Design for the whole development.

**Police.uk records** that there were **29 crimes** reported in Ystradowen in the year **August 2022 – August 2023**. The table below shows the crimes:

|  |  |
| --- | --- |
| Criminal Damage  | 4 |
| Public Order  | 3 |
| Anti- social Behaviour  | 4 |
| Vehicle Crime | 2 |
| Other theft | 4 |
| Violence and sexual assaults  | 11 |
| Burglary | 1 |
| **Total** | **29** |

**Layout**:

The Design and Access statement published in August 2023 proposes there will be 46 units on this development including 19 affordable homes. There is a mix of units from 1- 4 bed units. The development will be built non a green field site in the village of Ystradowen, Cowbridge.

There is one road into the estate and several footpaths.

**Perimeter:**

Properties do front onto the road with parking in between units. There appears to defensible space in front of the properties.

The several properties back onto hedges and paths e.g. 10 and 11 and units 22/23 back onto public open space/ the SUDS area.

There is two lanes that run to the rear of units 11-14 and 16-21. These units should ideally be afforded extra protection as they are not overlooked.

**Secured by Design New Homes 2023** States ‘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’ These lanes are not overlooked and run to the rear of the units.

A review of available research in this area concluded that: “Neighbourhood permeability… is one of the community level design features most reliably linked to crime rates, and the connections operate consistently in the same direction across studies: more permeability, more crime. Several studies across several decades link neighbourhood property crime rates with permeability versus inaccessibility of neighbourhood layout. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates…”

**Source: Taylor R B 2002 “Crime Prevention Through Environmental Design (CPTED): Yes, No, Maybe, Unknowable, and all of the above” in Bechtel RB (ed) “Handbook of Environmental Psychology”, John Wiley, New York, Pages 413 – 426. Cited by Professor Ted Kitchen Sheffield Hallam University 2007**

The recommendations by **Secured by Design New Homes 2023 states:**

Where a segregated footpath is unavoidable, for example where there is 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 8.20 to 8.22) devoid of potential hiding places **overlooked by surrounding buildings and activities well maintained to enable natural surveillance along the path and its borders.**

Poorly designed and specified communal areas, such as playgrounds, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour

**A Lux plan should be agreed by the planner in charge.**

**Recommendations:**

* Remove the paths to the rear of units 11-14/16-21
* Plant with defensible planting the space labelled POS
* There is a subway show next to unit 14 and there is a recess area between this and the subway. It would be prudent to plant some defensible planting next to the parking spot for unit 13 and the subway to prevent this.
* Define perimeter boundaries with defensible space. **Secured By Design New Homes 2023** states ‘For most housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1m) and railings or timber picket fence if a more substantial front boundary is required by the DOCO.’
* 10.2 Front garden planting of feature shrubs and suitable trees (e.g. open branched or light foliage, etc.) will also be acceptable provided they are set back from paths and placed to avoid obstructing visibility of doors, windows, and access gates to the rear of the property. Similarly, planting which allows a clear line of sight to the pavement and road is preferable.
* 10.3 Plant specimens may be used to discourage access to specific areas of the house frontage. Encourage judicious planning, making sure that the plant used is suitable for the environment that it is being used in. For example, defensive layered planting (such as agave or holly in a planter).
* Gates to the side of the dwelling that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8 m) and be capable of being locked (operable by key from both sides of the gate). Such gates must be located on or as near to the front of the building line as possible. Gates should be built as close to the front of the building line as possible to prevent designing in recessed areas and potential hiding places.
* **Boundary treatment**: The method of fixing between panel/rails and posts should create a secure mechanical bond so that panels/slats cannot be easily removed The fixings employed in the panel/pale to rail construction should be of galvanized steel or stainless steel with a design life to match the timber components Posts should be of a non-brittle material Where the fence panel is of a slatted design, they should be oriented vertically to avoid step-up points for climbing. Panels should be no less than 15 mm thick, fitted flush across the attack face to resist them being pried off and they should be securely affixed to the frame/rails Fencing panels or railings mounted on a wall should be located as close to the outer (external) face of the wall as possible to eliminate climbing opportunities or use as informal seating.
* Fence heights should be of a minimum 1.8 m overall and be capable of raking/stepping to maintain height over different terrain Pedestrian gates should be of a framed design and employ galvanised adjustable hinges and fixings mounted behind the attack face. In the case of the fencing that backs onto public space It would be recommended that the fencing is raised to at least 2.1 m and that defensible planting is used in front of this fencing e.g. a variety of planting such as pyracantha.
* On outward opening gates, where the hinges/ brace is mounted on the attack face, fixings should be of a galvanised coach bolt design. Hinge systems must not allow the gate to be ‘lifted off’ and therefore should employ a method to restrict the removal of the gate from the fence post or wall. Gates must be capable of being locked (operable by key from both sides of the gate).
* The gate construction should have the same design and construction attributes as the fence and ideally be self-closing in the interests of road safety Where entrance/driveway gates are required they should ideally be inward opening, of substantial framed construction and employ galvanised adjustable hinges and fixings mounted behind the attack face. Hinge systems must not allow the gate to be ‘lifted off’ and should employ a method to restrict the removal of the gate from the adjoining fence post or wall. Gates should be fitted with a galvanised drop bolts and facility for dedicated gate locking systems, padlocking (manual gates) or electro-mechanical locking (automated gates) and employ mechanical/electro-mechanical devices as applicable to hold gate leaves in the open position. The gate construction should have the same design and construction attributes as the abutting fence
* Where it is expected that a footpath will be in constant use, it should have all the required attributes as listed at paragraph 8.11 and be lit in accordance with BS 5489-1:2020. However, if such attributes are absent along a footpath, it may be advisable to discourage it’s use in some circumstances by not illuminating it during the hours of darkness.
* Facilities should be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space should be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings. We would welcome working with the developer to ensure the communal facilities are designed to ensure community safety and cohesion.

**Reason: To prevent theft and anti-social behaviour**

**Parking:**

The parking for the units is in curtilage/ in front of plots.

**Recommendation:**

* Where parking is designed to be adjacent to or between units, a gable end window should be considered to allow residents an unrestricted view over their vehicles; opaque or otherwise obscured glass in window sets in gable ends do not constitute an unrestricted view in these circumstances.

**Reason: To prevent vehicle crime**

**Lighting:**

**A lighting plan should be agreed by the planner in charge.**

**Recommendation:**

* All street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks must comply with BS 5489-1:2020. Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements should be discussed with the DOCO and the local authority lighting designers.
* Lighting is required to illuminate all elevations containing a door set, car parking and garage areas and footpaths leading to dwellings and blocks of flats. Bollard lighting is not appropriate as it does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.
* 27.3 SBD requires that only luminaires with suitable photometry serving to reduce light spill and light pollution may be used. Reducing light spill from inefficient luminaires into areas where lighting is not required is extremely important (Note 27.3).
* Note 27.3: Developers are reminded that intrusive lighting from the private lighting schemes into public areas may constitute a statutory nuisance and is wasteful and costly.
* 27.4 Using lamps with high colour rendering qualities (60 or above on the Colour Rendering Index for instance) often improves visual performance and people’s personal experience of an area. Colour rendering qualities of lamps refers to their ability to represent the colour of objects under illumination. To help with lamp selection, a measure is given from 100 – the colour rendering qualities of daylight – all the way down to 0 – where no colour rendering quality is available. It is argued that if we can see the true colours of objects under nighttime lighting conditions, our surroundings will appear to us as more familiar and comfortable with the attendant benefits of higher levels of public reassurance and satisfaction.
* 27.5 Overall Lighting uniformity (Uo) – levels of 0.4 or 40% – are recommended where possible to ensure that lighting installations do not create dark patches next to lighter patches where the human eye has difficulty in adjusting quickly enough to see that it is safe to proceed along any route. If high levels of uniformity are neither achievable nor appropriate for technical or locally applying environmental reasons, the highest levels of uniformity possible should be achieved 27.6 External public lighting must be switched using a photo electric cell (dusk to dawn) with a manual override or via a Central Management System (CMS) for large scale developments. If LED light sources are used, then shorter burning hours can be programmed as no warmup time is required for the lamp. 27.7 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. Moreover the Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons (Note 27.7). Further information is available at: www.securedbydesign.com Note 27.7: Secured by Design has not specified PIR activated security lighting for several years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment. 27.8 The use of light-emitting diode (LED) light sources is recommended with a colour temperature of no more than 4000 Kelvin and ideally below. This reduces blue light content and therefore the effects on human and ecology receptors.

**Reason: To enhance community safety**

**Physical security:**

**It is vitally important that SBD approved developments have the correct level of security specifications for door-sets and windows and that the selected doors for any development have been tested against the requirements of BS 6375, parts 1-3 and are classified according to their intended use. This is particularly important when deciding on the relevant door-set for an Apartment Block, as the usage will be much higher. Therefore, specifiers should satisfy the DOCO that the door-set is fit for its intended purpose and environment as in Section 22 of Secured By Design Homes Guide 2023 -** [**HOMES\_GUIDE\_2023\_web.pdf (securedbydesign.com)**](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.securedbydesign.com%2Fimages%2FHOMES_GUIDE_2023_web.pdf&data=05%7C01%7CJulie.Odgers2%40south-wales.police.uk%7C96f2863b66ab44d9892d08db940d83b5%7C270c2f4dfd0c4f0892a9e5bdd8a87e09%7C0%7C0%7C638266557979309385%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Qk%2BW5GThkfw3LbaDToELmKad3vNkTzUa4oGmvOP2XMY%3D&reserved=0)

**Details on the specifications for the doors/ windows for the Office/communal area can be found on the Secured by Design website as above.**

**The specifications for the doors and windows are as recommended:**

* All door sets allowing direct access into to the home, e.g. front and rear doors, interconnecting garage door sets, French doors, bi-fold or sliding patio door sets, dedicated private flat or apartment entrance door sets, communal door sets, easily accessible balcony door sets (Note 23.4a), etc., shall be certificated to one of the following standards: PAS 24:2022 (Note 23.4b), or PAS 24:2016\* (Note 23.4b), or STS 201 Issue 14:2021 (Note 23.4c), or LPS 1175 Issue 7.2:2014 Security Rating 2+ (Note 23.4d), or LPS 1175 Issue 8:2018 Security Rating A3+, or STS 202 Issue 10:2021 Burglary Rating 2 (Note 23.4d), or LPS 2081 Issue 1.1:2016 Security Rating B (Notes 23.4d and 23.4e), or STS 222 Issue 1:2021 \* PAS 24:2016 has been withdrawn by the British Standards Institute and replaced by PAS 24:2022, however PAS 24:2016 will continue to be an acceptable route to compliance until 31st December 2024.
* Window frames must be securely fixed to the building fabric in accordance with the manufacturer’s instructions and specifications. These should be made available to the DOCO upon request if the need for a visual confirmation is felt necessary.
* 24.2 All easily accessible (Note 24.2a) windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards: PAS 24:2022 (Note 24.2b), or PAS 24:2016\* (Note 24.2b), or STS 204 Issue 6:2016 (Note 24.2c), or LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 24.2d), or LPS 1175 Issue 8:2018 Security Rating 1/A1, or STS 202 Issue 10:2021 Burglary Rating 1, or LPS 2081 Issue 1.1:2016 Security Rating A, or STS 222 Issue 1:2021 \* PAS 24:2016 has been withdrawn by the British Standards Institute and replaced by PAS 24:2022, however PAS 24:2016 will continue to be an acceptable route to compliance until 31st December 2024. Note 24.2a: Easily accessible is defined within Approved Document Q Appendix A as: A window or door set, 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.
* **29.41 Tradesperson or timed-release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.**
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**Reason: to prevent burglary**

**Mail delivery:**

**Secured By Design New Homes 2023 states:**

There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and ‘fishing’ for personal items (which may include post, vehicle and house keys, credit cards, etc.). To address such problems SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation’s Technical Standard 009 (DHF TS 009) or delivery ‘through the wall’ into a secure area of the dwelling. DHF TS 009 letter boxes offer reassurance that all the above attributes have been met. In high crime areas DHF TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter plate apertures. The letter box must be securely fixed to the face of the building in accordance with the manufacturers specifications and be in a position that benefits from natural surveillance.

**Management plan**:

A robust management plan needs to be in place before habitation to ensure that plants are maintained to allow natural surveillance across the site. There should also be clear advice about the storage of litter and collection agreements.

**Policy Support**

* The Crime & Disorder Act 1998 created a statutory partnership between local authorities, the police, and other key partners to work together in reducing crime and disorder in all aspects of their work.
* Section 17 of the Act states:

“It is the duty of the authority to exercise its various functions with due regard to the likely effect on crime and disorder in its area and the need to do all that it reasonably can to prevent crime and disorder.”

* TAN 12 Design. Para 5.17.1 “Local authorities are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998. Consideration should be given to practical ways in which the design of development can reduce opportunities for crime, disorder, and anti-social behaviour.”

**Planning Policy Wales**

* 4.10.12 Local Authorities under Legal Obligation to consider the need to prevent and reduce crime and disorder…..
* 8.2.1. – Transport – Provision of safe, convenient, and well signed routes
* 9.1.1. –Housing – Objective to provide homes that are in good condition, in safe neighbourhoods and sustainable communities
* 9.1.2. Housing – Greater emphasis on quality, good design, and the creation of places to live that are safe and attractive

If you have any queries about the recommendations made, please feel free to contact us.

Yours Sincerely

Julie Odgers

**Designing out Crime Officer**