Communities and Partenrships

South Wales Police Headquarters

Bridgend

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15th Septemeber 2022

Shafquat Zahoor planner in charge

Vale of Galmorgan Council planning department

Barry

Dear Shafquat,

**RE: PLANNING APPLICATION NUMBER 2022/00958/FUL RESIDENTIAL DEVELOPMENT OF UP TO 105 DWELLINGS, OPEN SPACE AND ASSOCIATED HIGHWAYS AND DRAINAGE LAND BETWEEEN WINDMILL LANE AND ST ATHANS ROAD, COWBRIDGE.**

South Wales Police do not object to this application but would ask that the following recommendations are included on the the development.

South Wales Police would welcome working with the developer in order to achive a Secured by Design gold award as described in the Design and access statement. The response is based on the Design and access statement and plans dated August 2022.

**Outline**:

The propsed site is for 105 units, open space and highways at land betweeen Windmill lane and St Athans Road, Cowbridge.

**Crime**:

For the six months January 2022 – June 2022 **12 crimes** were receorded in the immediate area (POLICE.UK) is was recorded as follows:

|  |  |
| --- | --- |
| Public Order  | 4 |
| Criminal Damage  | 1 |
| Shoplifting  | 1 |
| Other theft  | 1 |
| Anti social behaviour  | 1 |
| Violence and sexual offences  | 4 |
| **TOTAL**  | **12** |

**Site layout:**

The proposal for full planning permission for 105 units, open space that a foot path that leads to Llanquian Close and Tanglewood and highways. There is also a foot path which runs around the edge of the SUD the same advice applies to this.

Any footpaths should be wide, straight, and well-lit and devoid of hiding spaces.

**Recommendations**:

* Pedestrian routes must be designed to ensure that they are visually open, direct, overlooked, lit, and well used. They should not undermine the defensible space of neighbourhoods and should not be segregated from one another or provide access to rear or side gardens as such paths have been proven to generate crime.
* Secured by Design also recommends ‘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. 8.15 Think carefully when selecting tree species to be used adjacent to a footpath or verge and consider their whole-life growth characteristics. Many trees will grow tall, dense canopies as they reach maturity. If unmaintained, this broad canopy will spread many metres from the trunk of the tree, and overhang paths and may create difficulties in maintaining a clear, accessible route, in addition to creating a sense of enclosure for path users. Routes with overhanging branches can also be a particular issue for people with sight loss. A large canopy may also block natural light and restrict the effectiveness of street lighting. 8.16 Trees with slender or fastigiate forms naturally grow a narrow, tall canopy, and are less likely to over-hang paths regardless of their maturity. Similarly, pleached trees have been trained to produce a narrow canopy above a very straight, clear stem. A variety of species are available with similar growth forms, which provide height and structure without the issue associated with large canopies.’
* All vehicle parking bays should be within curtilage and must be overlooked. Rooms in the properties that are usually occupied should overlook the parking bays.
* During the hours of darkness, the bays must be well illuminated, and they must enjoy good natural surveillance from the properties with unobstructed views. Secured by Design does not recommend bollard lighting as it does not give a uniform spread of light and can be easily damaged.

**Reason**: To prevent burglary/ theft from/of vehicles/enhance public safety

**Lighting:**

Lighting on housing developments should meet the British Standard 5489:2013. The lighting of footpaths should also be included in this. Any lighting scheme should be agreed by the planner in charge.

**Recommendation**:

* Secured By Design ‘New Homes 2019’ 8.19 recommends ‘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 5489-1:2013. If the footpath does not have these attributes, then its use should be deterred during the hours of darkness by not installing lighting.’

**Boundary identification:**

There needs to be a differentiation between public and private areas, this can be created using defensible space. Defensible space uses symbolic barriers e.g., pillars, rumble strip, or a change of road surface, i.e., colour or texture, should be built into the design to encourage a feeling of territoriality amongst users especially at the entrance to the development. In this development there appears to be a fence to the sides that has a facility for wildlife to be given access, I assume this is a hit and miss fence, the details are not given. A clear boundary needs to be established defining public/ private space.

It is important that the plots that overlook the open space have clear boundaries at the front to ensure that there is differentiation between public and private space to prevent anti-social behaviour.

In this development the rear gardens are defined but the front/ sides of many properties are defined by grass, this will not give a clear indication of public/private space and as such might encourage anti-social behaviour for example plots 16/17/18, 42,50 and 53.

It would also be recommended that the gardens that back onto the SUDS that the boundaries to the rear are increased to prevent theft.

There appears to be several shared access lanes to properties such as 14/15, 58 -64, 71-78 and 82 and 83. The creation of such lanes provides ideal hiding places to the side of houses. It would be advisable to gate these alley ways at the front building line to eliminate this problem.

**Recommendation**:

* Front boundaries should be identified by a 1 m low wall and gates or defensible planting to the same height. The rear garden boundary should be 1.8 m high, with any gated to be built to the same height, lockable and not climbable. If a rear garden backs onto a public open space, then the rear boundary should be at least 2.0 m high.
* There should be a change of surface, i.e., colour or texture to identify public areas from private or semi-private areas e.g., the footpaths from the driveways/front gardens.
* Garden gates to be installed at the building line.

**Reason**: To prevent burglary/anti-social behaviour.

**Landscaping and planting**.

Overgrown shrubs and other thick barriers that are near public areas must be avoided and clear sightlines must be maintained over long distances. Windows and doors must not be obscured by landscaping features and trees in public areas must not have any foliage below 2 metres from the ground.

**Recommendations**:

* Trees and other landscaping features must not be positioned where they could create hiding/entrapment spaces, obscure signage and lighting or provide a potential climbing aid into properties.
* There should be clear lines of sight across the development and clear unobstructed views of the parking bays from the properties.
* A robust management plan should be in place to ensure that planting in public areas e.g the open space is maintained regularly.

**Reason**: To prevent hiding place/ enhance public safety.

**Side and rear boundaries**.

The walls/fencing and gates preventing access to the rear and sides of the properties must be robust, at least 1.8 metres high (2 metres high if the side or rear gardens are adjacent to open land or a footpath). To prevent it being climbed the perimeter security must be of a suitable design.

**Recommendations:**

* Gates should be lockable both sides with a key, the same height as the adjacent wall/fencing and **sited at, or as near to, the front building line of the properties as possible.**
* Rear and side gardens must be secure areas and have locks.

**Reason**: To prevent burglary/ theft

**Parking:**

Parking is mostly in curtilage and between houses. The design of the private houses allows for a window in the side elevations of the properties but not from active windows e.g. a lounge/ kitchen.

Secured by Design New homes 2019 16.6 states ‘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.

16.7 Communal parking facilities must be lit to the relevant levels as recommended by BS 5489-1:2013 and a certificate of compliance provided. See paragraph 18 for adopted parking areas and paragraph 59 for private external communal lighting requirements

16.2 Where communal parking areas are necessary, bays should be sited in small groups, close and adjacent to homes, be within view of active rooms (Note 16.2) and allocated to individual properties. Note 16.2: 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.

There are also some parking spaces on the side of houses where they are not overlooked such as plots 70, 91 and 42 this could make these spaces vulnerable.

**Recommendations:**

* Include windows in the side elevations in habitable rooms to overlook parking spaces.
* Move the parking space outside 70,91 and 42 to ensure they are overlooked.

**Reason:** To prevent theft

**Garden sheds**:

Garden sheds that are close to the back garden fence and could be vulnerable to attack.

**Recommendations**:

* Move the gardens sheds further into the garden to make them less accessible.

**Reason**: To prevent theft.

**Bicycle storage**

There are high instances of bike crime in the Cardiff area. Bike storage should be secure to prevent theft.

1. **Recommendation**:
* Secured by Design 2019 56.3 External, open communal bicycle stores with individual stands or multiple storage racks for securing bicycles will be as close to the building as possible, but in any event within 50 metres of the primary entrance to a block of flats and located in view of active rooms (Note 56.3) of dwellings. The store must be lit at night using vandal resistant, light fittings and energy efficient LED lights.
* 56.4 Research by the ‘Design against Crime Centre’ suggests that cyclists should be encouraged to lock both wheels and the crossbar to a stand rather than just the crossbar and therefore a design of cycle stand that enables this method of locking to be used is recommended. Minimum requirements for such equipment: • Galvanised steel bar construction (minimum thickness 3mm), filled with concrete; • Minimum foundation depth of 300 mm with welded ‘anchor bar’. Compliance can be demonstrated by products certificated to one of the following minimum-security standards: • LPS 1175 Issue 7.2:2014 Security Rating 1; or • LPS 1175 Issue 8:2018 Security Rating 1 (A1); or • Sold Secure (Bronze, Silver or Gold); or • STS 502.
* Install a bike storage unit that is lockable and accessed by a digital lock or such like. Bikes should be secured as above.
* **Reason**: To prevent theft

**Bin stores.**

Bins must be kept in secure areas and for apartments must be secure and have access control fitted e.g. digital locks.

Reason: To prevent arson

**Security lighting:**

Security lighting must be installed controlled preferably by photo electric cells or time switches, or alternatively PIR detectors. The lighting must protect the rear and sides of the homes, the parking bays, and the driveways.

**Public utilities**.

If smart meters are not installed meter boxes should be fixed to, or as near to, the front building lines of the properties as possible.

**Reason:** To prevent the creation of hiding spaces at the side/ rear of homes.

**Blank walls.**

Windowless elevations or blank walls adjacent to space to which the public have access, should be avoided, and provide at least one window to a habitable room wherever possible. Where blank flanking walls are unavoidable, a 1 metre ‘buffer zone’ should be created.

**Recommendation**:

* Instal windows in blank elevations

**Reason**: Improve natural surveillance.

**Windows**:

All ground floor and easily accessible windows should meet the SBD standard PAS 24 2016 or equivalent.

**Reason: To reduce the risk of burglary.**

**Doors:**

All external doors should meet SBD standard PAS 24 2016 or equivalent.

**Reason: To prevent burglary*.***

If you have any queries about the above, please do not hesitate to contact me.

**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. South Wales Police would welcome working with the developers to obtain Secured by design status for the various parts of the development

Yours Sincerely

Julie Odgers

**Designing out Crime Officer**

***Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. South Wales Police welcome’s receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.***