

From: BARR Sarah-Jane 56305 [mailto:Sarah-Jane.BARR@devonandcornwall.pnn.police.uk]
Sent: 06 December 2017 12:01
To: Planning <Planning@torbay.gov.uk>
Subject: FAO Carly Perkins re P/2017/1133

Good morning,

Re: P/2017/1133 - Outline application for residential led development of up to 400 dwellings (C3) together with the means of vehicular and pedestrian/cycle access together with the principle of a public house (A3/A4 use), primary school with nursery (D1), internal access roads and the provision of public open space (formal and informal) and strategic mitigation. The proposal includes amendments to Brixham Road, Long Road junction and Windy Corner junction. Details of access to be determined with all other matters reserved. Land to the south of White Rock, adjacent to Brixham Road, Aka Inglewood, Paignton. Applicants are Abacus Projects Limited/Deeley Freed Limited.

Thank you for requesting consultation on the above, which I appreciate is for outline only with all other matters reserved, except for means of access, but a development this size has real potential to impact on crime, fear of crime, antisocial behaviour and conflict, as such it is disappointing that there appears to be no reference in the Design and Access Statement (DAS) to designing out crime or crime prevention per se, however there is slight reference in document '15230-HIA Health Impact Assessment' which states, *'Design principles avoid approaches which might lead to crime or antisocial behaviour. Specifically, courtyard parking and unlit alleys to the rear of properties have been avoided'*, which provides some reassurance.

To assist please find the following initial information, advice and recommendations which are based on the illustrative Masterplan (15230-MP) which I accept may change:-

It is appreciated that building regulations in terms of the security element namely Approved Document Q (ADQ) sits outside the remit of the decision making process for the planning authority but please note the following which is to inform the applicant at this early planning process to ensure future compliance with ADQ:-

ADQ creates security requirements in relation to all new dwellings, including those resulting from a change of use, for example commercial, warehouses or barns undergoing conversion into dwellings. It also applies to conservation areas.

All doors at the entrance to a building, including garage doors where there is a connecting door to the dwelling, and all ground floor, basement and other easily accessible windows, including roof lights, must be shown to have been manufactured to a design that has been tested to an acceptable security standard i.e. PAS 24 2016.

As such it is recommended that all doors and windows are sourced from a Secured by Design (SBD) member-company. The requirements of SBD are that doors and windows are not only tested to meet PAS 24 2016 standard by the product manufacturer, but independent third-party certification from a UKAS accredited independent third-party certification authority is also in place, thus reducing much time and effort in establishing provenance of non SBD approved products.

SBD also incorporates a bespoke element to assist in the crime prevention approach with regard to listed buildings and heritage status.

Secured by Design (SBD) is a crime prevention initiative owned by the Mayor's Office for Policing and Crime (MOPAC) on behalf of the UK police services. SBD aims to reduce crime, the fear of crime and opportunities for antisocial and unacceptable behaviour and conflict within developments by applying the attributes of Environmental Design, as follows, in conjunction with appropriate physical security measures:-

- **Access and movement:** Places with well-defined and well used routes, with spaces and entrances that provide for convenient movement without compromising security
- **Structure:** Places that are structured so that different uses do not cause conflict
- **Surveillance:** Places where all publicly accessible spaces are overlooked; have a purpose and are well managed to prevent creating areas which could attract criminal activity, the antisocial to gather or for unacceptable behaviour such as dumping and dog fouling etc. to go unnoticed
- **Ownership:** Places that promote a sense of ownership, respect, territorial responsibility and community
- **Physical protection:** Places that include necessary, well-designed security features as laid out in SBD Homes 2016, Commercial 2015 & New Schools 2014
- **Activity** - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime, fear of crime and a sense of safety at all times
- **Management and maintenance** - Places that are designed with management and maintenance in mind to reduce the fear of crime and discourage crime and ASB

It is recommended that the development, if approved, is constructed to achieve full SBD compliance to ensure a consistent level of security throughout and opportunity for crime, fear of crime and disorder are minimised. I welcome early consultation to ensure important factors are not missed which could affect compliance.

Parking

Having reviewed the application the level of detail and consideration with regard to parking provision for the proposed development is noted but despite the number of spaces per dwelling being in accordance with the Torbay Plan there is ever increasing visual evidence that parking per se, for new development in the area, is an ongoing issue, with the main contributing factors appearing to be insufficient provision, lack of space and poorly designed parking spaces and areas.

2 parking spaces per dwelling is likely to prove sufficient for a property with 1 or 2 bedrooms but perhaps not so for 2+ bedroom family dwellings.

The proposed measures to try and encourage residents and their visitors to walk, cycle or use public transport over the preference of owning a private vehicle are fully supported but actually for many new developments in the area, the owning of private vehicles, despite being in close proximity to local amenities, appears to still be the preferred method of transport.

The potential ramifications of insufficient and in some cases poorly designed parking for some new development is not being appreciated until full occupancy and at the most busiest times such as evenings and weekends when the majority of residents are at home,

at which stage it is generally too late to remedy. If parking does not provide the necessary security, ease of use or convenience, for example transferring bags, car seats, children etc., residents will more than likely adjust their parking needs in ways not intended and in some cases this will result in parking on the highway, pavements or any available space just to be as close to their property as possible in order to make these functions as easy and safe as possible. But this can easily introduce a source of upset, angst and conflict amongst residents due to parking related issues.

Some considerations:-

- Avoid parking which is located some distance from the dwelling or is awkward to get to
- Ensure roads throughout the development have the capacity to accommodate on road parking without hindering the movement of other vehicles
- Owners will generally want to be able to see their vehicle/s from their dwelling or at least know they are secure
- Garages that sit outside of the dwelling curtilage should be well overlooked. Remote garages situated in blocks are more vulnerable to burglary
- It is considered that parking bays behind car ports or in front of garages do not provide a convenient method of parking due to the 'stacked' parking arrangement and residents having to move vehicles around to accommodate who has to leave first. It is likely therefore that the 2nd car will park elsewhere to avoid this
- With regard to courtyard parking the specific concern are those that are positioned to the rear of dwellings, left insecure and lack surveillance from active rooms
- Ensure there is generous space for visitor parking
- Measures should be put in place to prevent unauthorised parking for example on verges, green spaces etc.

It is respectfully requested that the level of parking provision and the design of parking spaces are carefully considered prior to determination.

I look forward to reviewing more detailed plans should they evolve but in the meantime please do not hesitate to contact me if I can assist further.

Thank you

Kind regards

Sarah-Jane

Sarah-Jane Barr
Police Designing out Crime Officer - South Hams, West Devon, Torbay & Dartmoor National Park
Totnes Police Station
Ashburton Road
Totnes
Devon
TQ95JY

Telephone 01803 860456
(Internal 4656)

Email SarahJane.BARR@devonandcornwall.pnn.police.uk

Alliance Prevention Department
Devon & Cornwall Police and Dorset Police
Working together to serve the public

This e-mail is intended for the named recipient(s) only and may contain privileged information, which is protected in law. If you have received this e-mail in error, please contact the sender to advise them and delete this e-mail. Unauthorised use, disclosure, copying or distribution is prohibited.

E-mail should not be regarded as a secure means of communication, we take all reasonable steps to ensure that e-mails are protected from malware, but cannot accept liability for any loss or damage, howsoever arising, as a result of their transmission to the recipients' computer or network.

For more information, or to contact us, please visit us at www.devon-cornwall.police.uk or www.dorset.police.uk or e-mail 101@devonandcornwall.pnn.police.uk or 101@dorset.pnn.police.uk