



Daniel Washington C2010
Designing Out Crime Officer

Thames Valley Police
Headquarters South
Oxford Road
Kidlington
OX5 2NX

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Reference: PL/24/1155

Location: John Lewis Customer Collection Point, Crossland Road, Reading, RG1 2HT

Dear Mr Bradfield,

Thank you for consulting Thames Valley Police in relation to the above planning application. I have reviewed the submitted documents and crime statistics for the area.

The following comments are provided to ensure the application meets the requirements of;

- The National Planning Policy Framework 2023 paragraph 96(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...
- The National Planning Policy Framework 2023, paragraph 135(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".
- Local Plan policy CC7: Design and the Public Realm, which states that developments will be assessed to ensure that they (inter alia) "Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion"
- Local Plan policy CC8: Safeguarding Amenity which states development "will not cause... unacceptable living conditions for new residential properties in terms of (inter alia) Crime and Safety.

I have significant concerns with the proposed development from a designing out crime perspective and request that revisions are undertaken to the scheme to address the following issues prior to the determination of the application:

Access into apartment building

It is noted that a 24/7 on site management team for security is proposed. However, the scheme proposes multiple entry/exit points into the building which would make security monitoring difficult and provide multiple opportunities for failure of any security system. All of the entry points would appear to allow open access to the whole of the ground floor area

once entry has been gained, which exacerbates the issue. The number entry/exit points which are directly accessible from the public realm should be minimised as far as possible.

Whilst the plans intend a primary pedestrian entrance, it is likely that if the “neighbourhood garden” is proposed to be open to the public (more on this below), that the secondary pedestrian access will be as well used as the main entrance and will need the same level of security controls (including secure visitor access facilities) and monitoring as the main entrance.

If a single main entrance point for residents is proposed, so that all residents have access to the communal facilities (lounge, gym, home-work area etc), then vertical compartmentation will need to be provided to ensure that stair/lift lobby are only accessible to residents with apartments directly accessed from these areas. Resident’s apartments should not be accessible from multiple stair cores. This can effectively function as merged cores where permeability is provided through the development, undermining access controls and creating a circular movement within the development which is beneficial to crime and anti-social behaviour. Access controls to ensure that a second core is only available in times of emergency should be considered.

Public Access to Garden spaces

The proposed public access to the “neighbourhood garden” is a significant concern with the proposed development. The provision of such a facility for use by the wider public, particular in a city centre location such as this and with limited ground floor active frontages, can introduce issues such as antisocial behaviour and exposes additional entrance/exit points of the building to the public realm, undermining any security strategy. Similar spaces located in the surrounding area have suffered from undesirable use and antisocial behaviour.

It is recommended that the open spaces within the development are provided for the use of residents only and there is clear definition between public and private space. Robust boundary treatment should be provided to ensure that access cannot be gained directly into the space from outside the site. This would have the additional benefit of reducing the number of entrance points (accessible from the public realm) into the building.

Active Frontages

The scheme proposals provide very limited active frontages at ground floor on all sides of the development. On the shorter west elevation of the building there are no active ground floor frontages at all. On the main (Mill Lane) frontage, active frontages are limited to the entrance doorway of the apartment and the community /commercial space at the corner of the building. The cycle store is shown in 3D visuals as offering a shop type appearance, although in reality this is a store for bikes and will not offer any natural surveillance of the street and it is questionable that windows into the store should be provided for security purposes.

Blank frontages can present the opportunity for crimes such as graffiti, antisocial behaviour or inappropriate loitering. Active uses should be introduced to the ground floor of the building which have the potential to offer natural surveillance of the street. Natural surveillance can assist with both increasing the perceived danger of attempting criminal activity and increase people’s feeling of safety.

Access and Security Strategy

I note the inclusion of information within the Design and Access Statement regarding a security strategy. However it is considered more detailed information should be provided to confirm access control measures. This should include:

- **Access control measures for residents and visitors:** Unrestricted access to the apartment block must not be possible, and residential access should be controlled by a two-way audio visual system with remote access controls. No trade buttons should be present.
- **Arrangements for postage and deliveries:** Postal services must not have unrestricted access to private communal areas, and mail delivery should be provided within a secure lobby at the entrance to the building, or via “Through the wall” letterboxes. A secondary delivery entrance and route is shown on the plans, but details should be provided to confirm how this will be managed and kept secure
- **Compartmentation:** Proposals for compartmentation of the building so that residents only have access to parts of the building that they need to, as offenders have the potential to be both external and internal to the development. Secure lobbies should also be extended to each floor to enable effective compartmentation. Compartmentation is referenced, but details as to how this will be implemented should be provided.
- **CCTV:** Details of CCTV including proposed location of cameras and management. Lighting of spaces should be considered together with the proposed CCTV system
- **Bins and Cycle Stores:** Details of how access to bin and cycle store will be managed and appropriately restricted.
- **Specification of Windows and Doors:** “PAS24 to communal entrances and apartment doors” is stated in the submitted Design and Access Statement. However, to ensure that communal entrances are suitably robust, these should be to LPS1175 issue 8 Secure Rating B3+. A plan should be provided making it clear the purpose of each entrance/exit doorway, how it intended to be used and proposed security features.

From a counter terrorism perspective the use of laminated glazing is recommended for new builds as 95% of all injuries in a blast are caused by flying glass. In addition to limiting injury to those within a building and members of the public outside, laminated glass can also reduce the amount of time during which a building may need to be closed for repair in the event of a blast. There are also environmental advantages as installing laminated glass can assist in reducing the carbon footprint and energy consumption.

Given the scale and location of this development, laminated glazing should be used. The following guidance should be followed when specifying the glazing within the development. <https://www.npsa.gov.uk/system/files/documents/measures-to-improve-the-blast-resistance-of-glazing.pdf>

Access control measures should follow the guidance set out in Secured by Design Homes Guide 2024 (Section 29 provides guidance on access control and additional security requirements for buildings containing multiple dwellings).

The above comments are made on behalf of Thames Valley Police and relate to designing out crime 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.

Yours Sincerely,

Dan Washington | Designing Out Crime Officer