



**Daniel Washington C2010**  
Designing Out Crime Officer

**Thames Valley Police**  
Headquarters South  
Oxford Road  
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02 March 2026

**Reference: PL/25/1706**

**Location: Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS**

Dear Jonathan,

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 and the following comments are provided to ensure the application meets the requirements of the National Planning Policy Framework 2024 (NPPF), which states:

*“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” (Paragraph 135(f), NPPF).*

Thames Valley Police (TVP) commented on the previous version of the scheme (planning application reference 230822) in January 2024. The amendments made to the scheme as part of this application have not addressed or referenced TVP’s previous comments. I therefore repeat the comments below. Comments are split between requests for revisions to the Design Code (which should be addressed prior to determination of the application) and comments to help ensure that crime and security are considered when the detail of the scheme is being prepared and to avoid an objection from Thames Valley Police at the Reserved Matters stage.

### Design Code

| Section                                  | Comment                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.1                                      | I ask that the wording is updated to read: The residential neighbourhood must be designed in all instances to provide safe, engaging areas of public realm and ground floor level uses to animate the ground floor plan.                                                                                                                                                           |
| 4.1                                      | I ask that an additional “Must” requirement is added requiring streets, routes and crossings to be safe, with high levels of surveillance and designed to reduce the fear of crime.                                                                                                                                                                                                |
| 4.2                                      | A point should be added requiring footpaths and cycle ways to be co-located and not segregated or isolated.                                                                                                                                                                                                                                                                        |
| 4.3 – Correct cycle parking illustration | The picture provided is not acceptable, and indicates the use of an inappropriate cycle stand as acceptable. All cycle storage facilities must facilitate the locking of both wheels and the frame to the stand – the racks in the image only allow one wheel to be locked and are very vulnerable to theft. I ask that this image is replaced with acceptable cycle parking of an |

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|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                    | approved standard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 4.3 – Correct cycle parking positions illustration | The illustration provided with cycle parking between trees is not an acceptable design standard as the tree planting would inhibit effective CCTV coverage of the stands. Any public cycle parking must have very high levels of surveillance with no landscaping creating obstructions to views.                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5.1                                                | I ask that an additional point is added worded as follows; The public realm including planting, landscaping and lighting must be coordinated to ensure high levels of natural and formal surveillance with no areas of conflict.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 5.8                                                | Seating benches & picnic sets should be designed to prevent rough sleeping                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5.8                                                | Cycle stands should be installed only in well-lit areas with high levels of surveillance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 5.11                                               | Secured by Design section should not just be in relation to landscape proposals. The whole development should be subject to a Secured by Design Review. Note that the reference should be updated to Secured by Design Homes 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Garden Rooms                                       | I note reference is made to “Garden rooms” creating covered dwell spaces throughout the development. The nature or design of these spaces is unclear. However, I have concerns that they may create enclosed spaces very vulnerable to crime and ASB that may have a subsequent negative impact on the wider development. Any proposals must demonstrate that they contribute positively to the street scene without inadvertently attracting misuse and crime                                                                                                                                                                                                                                                                                                                 |
| 6.2                                                | The scale and nature of the proposed development creates a significant risk for crime and antisocial behaviour to permeate through buildings and undermine safe, inclusive and healthy communities, unless appropriate steps have been taken to design out crime from the outset. Section 6 of the Design Code makes no reference to Secured by Design. I ask that this is given specific acknowledgement and a “must” design requirement within the Design Code. All buildings must be designed and specified in accordance with the requirements of Secured by Design, in order to reduce the risk of crime and disorder occurring within residential blocks. All buildings must achieve effective compartmentation to reduce opportunities for crime and disorder to occur. |
| 6.8.2                                              | Defensive planting should be in place in front of residential ground floor windows to provide an additional layer of security.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6.9                                                | The Plot design codes should include standard methods for improving the safety and security of apartment blocks such as: <ul style="list-style-type: none"> <li>• Secure lobbies</li> <li>• Layouts which facilitate compartmentation (so residents only have access to the areas of the building they need to)</li> <li>• Secure cycle and bin stores</li> <li>• Secure postage provision</li> </ul>                                                                                                                                                                                                                                                                                                                                                                          |

## General Comments on Scheme

### Parking

- Underground parking may be highly vulnerable to crime and antisocial behaviour, as a large amount of vehicles will be parked out of sight of the owners and where other surveillance from surrounding development is not possible. In order to reduce opportunities for crime, it is vital that all underground parking is designed to maximise surveillance and prevent any blind spots or hiding places. The size of this facility is unlikely to foster a sense of ownership or residential supervision. Large car parks that lack territoriality are extremely vulnerable to criminal activities. Crime and ASB are more likely to occur where an offender’s presence does not attract attention or provides a legitimate excuse for individuals to be in areas where they have no right to be. The crime, anti-social behaviour and the fear of such crimes may result in the occupants abandoning the parking facilities.
- The layout of underground parking must facilitate clear lines of sight throughout, and lighting should be maximised to increase the sense of safety and support formal surveillance (CCTV). Wall and ceiling colours within the underground car park should be light in colour to

maximise lighting. The car park must be fully secured and access controlled to prevent any unauthorised pedestrian or vehicular entry.

- Underground car parks are at elevated risk of crime including terrorism and as such must be robustly secured. The underground car park must have access controls and height restrictors in place to prevent large vehicles entering the undercroft parking area. Given the size of this car park, I ask that the access control gates/barriers are designed to prevent unauthorised pedestrian and vehicular entry. Visitor entry requirements will need to be considered and appropriately managed.
- A single large open car park connecting buildings creates excessive permeability, and may provide an offender open access to a number of buildings within the development, with numerous escape routes, significantly increasing the risk of crime. Residential cores leading down into underground parking areas must not provide direct access to the main cores and residential areas of the building and must be access controlled. Any core rising from the underground car park should terminate into a secure lobby to prevent uninhibited onward access into private areas of the development. Ideally, each residential block should be provided its own segregated and secure parking area.
- Parking spaces with EV Charging should be well overlooked by surveillance, as this equipment is valuable and theft of EV charging cables and equipment is a significantly increasing crime threat.
- I ask that consultation is made with the local Fire and Rescue authority with regards the location of EV parking and charging facilities, as there are concerns with the risk of thermal run away, particularly underneath a residential block.
- Commercial/public short stay parking must be clearly identifiable from residential parking, and should have sufficient management processes in place to prevent it being abused by residents of adjacent development, where low levels of car parking are proposed.
- I ask that a parking management strategy is provided in any future reserved matters which demonstrates how the low parking provision will be managed in terms of allocation and control/prevention of unauthorised parking.

### **Defensible Space and Planting**

There should be clear definition between the public and private realm. Where the public or semi-private realm adjoins private areas of the development, defensible space and planting, to a depth of at least 1m should be provided. This will provide an area of 'stand-off', marking the change of ownership and therefore the acceptable activity that is associated with it, protecting the privacy and security of occupants whilst reducing the potential for neighbourhood disputes. I recommend thorny species such as Hawthorn are used where vulnerable ground floor windows are accessible, to enhance the physical protection of these boundaries.

### **Surveillance**

It is vital that public areas are well overlooked by natural surveillance from surrounding dwellings, and active frontage to all streets and to neighbouring open spaces should be a key aim in all developments. Surveillance should be provided at ground floor level from active rooms within dwellings. Active rooms include Living rooms and kitchens, which are most likely to be occupied throughout the day.

### **CCTV**

No details as to the provision of any CCTV, or the type of cameras or their anticipated role or function has been given. Will Public open space cameras be monitored by Reading Borough council or by another entity?

Safer Places highlights that CCTV can have a positive impact on crime, especially when implemented as part of a wider package. However, CCTV should not be considered as an alternative to good design. CCTV is most effective when combined with good lighting and designed to counter a set of

offences, and supported by management, continuous monitoring and adequate response to incidents.

I recommend a CCTV operational requirements study is carried out prior to the scheme being finalised. This will help to gain an understanding as to what the role of each camera is and to what standard they must achieve.

### **Access and Security Strategy for Apartment Blocks.**

An Access and Security Strategy should be submitted with reserved matters to detail how each apartment block is proposed to be kept secure. The following matters should be considered in any Access and Security Strategy:

- **Access control measures for residents and visitors:** Unrestricted access into apartment blocks must not be possible, and access should be controlled by a two-way audio visual system with remote access controls. No trade buttons should be present.
- **Postage and Deliveries:** Postal services must not have unrestricted access to private communal areas, and mail delivery should be provided within a secure access controlled lobby at the entrance to the building (an air-lock entrance arrangement as part of access control strategy), or via a secure external letter boxes (certified to TS 009) or delivery 'through the wall' into a secure area (see section 39 of SBD)
- **Compartmentation:** Proposals for compartmentation of the building so that residents only have access to parts of the building that they need to (i.e. the main entrance and core/corridor on which their flat is located), 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. Access to communal terraces will need to be considered in relation to compartmentation
- **Bin and Cycle Store**
  - Internal residential bin stores should be robustly secured with a single leaf door to a minimum standard of LPS 1175 SR2 or equivalent. Bin stores must be well lit, and have CCTV internally and covering external access points. The size of the bin store should be sufficient for convenient and safe access and movement of bins, but not so large that there are large areas of open space that may be abused, such as fly-tipping of old furniture and other waste.
  - Management processes must be in place to prevent bins being left out and insecure on collection days, as this would present a significant risk of arson. Bins must be securely stored at all times, only removed from stores at the point of collection. Further details regarding these arrangements should be provided.
  - Cycle stores must be secured with a single leaf door to a minimum standard of LPS 1175 SR2 or equivalent, lit and covered by CCTV. They should be linked to access control systems and compartmentalised to store no more than 70 cycles per store.
- **Window and Door security Specification:** This should include the consideration of appropriate openings for ground floor windows from a security perspective.
- **CCTV**
- **Lighting:** 24-hour lighting (switched using a daylight sensor formally called photoelectric cells) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and underground garaging facilities and all entrance/exit points. Technology exists in respect of energy efficient light dimming systems and other means of ensuring that security lighting is intelligently provided in the right quantities and only at the right time.

To aid the applicant the attributes of any secure access system should include:

- Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.);
- Vandal resistant external door entry panel with a linked camera;
- Ability to release the primary entrance doorset from the dwelling;
- Live audio/visual communication between the occupant and the visitor;
- Unrestricted egress from the building in the event of an emergency or power failure;
- Ability to recover from power failure instantaneously;
- Capture (record) images in colour of people using the door entry panel and store for those for at least 30 days. If the visitor door entry system is not capable of capturing images, then it should be linked to a CCTV system or a dedicated CCTV camera should be installed for this purpose. This information should be made available to police within 3 days upon request
- All visitor and resident activity on the visitor door entry system should be recorded and stored for at least 30 days. This information should be made available to police within 3 days upon request.
- Systems must comply with General Data Protection Regulations (GDPR)
- Compartmentation through the building must be achieved through the programming and positioning of the access controls. Residents must only be able to access the parts of the building that they need to – i.e. the main entrance and core/corridor on which their flat is located.

### **Merged cores within residential blocks**

Indicative floorplans within this application appear to indicate the presence of merged cores within residential tower blocks. Lift/Stairwell cores should not be merged i.e. two or more cores accessing the same area. Merged cores provide permeability through the development undermining access controls and creating a circular movement within the development which is beneficial to crime and anti-social behaviour. The design of the building, corridors and points of access control must prevent one core being accessible from another (other than when required in times of emergency). This can be achieved by the use of a secured fail-safe and alarmed door within residential corridors.

### **Laminated glazing**

- 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 must be used in all buildings. The following guidance must be followed when specifying the glazing within all buildings in this development. <https://www.npsa.gov.uk/system/files/documents/measure-to-improve-the-blast-resistance-of-glazing.pdf>

### **Public Open Space**

- Areas of POS/play should be designed and located to incorporate a high level of natural surveillance from neighbouring dwellings. The occupants of these dwellings could act as capable guardians to play areas, but need to be able to observe the area from active rooms in the dwellings to do so effectively. Clear stem trees (clear to 2m), and hedging maintained below 1m should be used in the planting to facilitate clear sightlines.

- All pedestrian/cycle routes through the development where vehicles are not permitted must be secured with mitigation measures of a sufficient standard to protect against the threat hostile vehicles.
- The number of seating areas should be proportionate with the likely level of use of this residential area. Seating should not be overprovided. This could encourage undesirable use from non residents and inappropriate loitering and antisocial behaviour in an otherwise low use area. Seating should not be grouped in single areas which can encourage large groups to congregate which would be inappropriate in this residential environment and could be intimidating, reducing feelings of safety.

### **Wider connectivity**

I note this development seeks to connect to the Biscuit Tunnel to the east, which is a site at risk of crime and antisocial behaviour. I ask that consideration is given to improvements being made to this important connection, including the route to and from it linking to this development, to improve the routes and reduce opportunities for crime and ASB, prior to promoting this as an active travel route to be used by residents of this development.

### **Lighting**

Lighting throughout the development should meet the general standards of BS5489-1:2020. Bollard lighting is not an appropriate lighting method, and should be avoided. Not only can they be damaged by reversing vehicles, more critically they do not provide sufficient light at the right height to aid facial recognition and reduce the fear of crime. It also does not deter crime and antisocial behaviour

As a general point, and for any future specification for the development, I would recommend the applicant consults the guidance provided by Secured by Design Residential Guide 2025.

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 me.

Yours Sincerely,

Dan Washington | Designing Out Crime Officer