



## Crime Prevention Through Environmental Design Planning Response

<b>Site Address</b> – Chasefield House 888 Fishponds Road Fishponds Bristol BS16 3XB	<b>App. Ref</b> – 25/13176/PINS
<b>Development description</b> – Application for Planning permission for Conversion of existing care home (Use Class C2) to provide two separate, large Sui Generis HMOs (1no. 9 bedroom and 1no. 10 bedroom) together with associated external alterations to the building.	<b>Response Date</b> – 26/08/2025
<b>Designing Out Crime Officer</b> – Charlotte Thompson Crime Prevention Unit   Avon and Somerset Police, The Bridewell, 1-2 Bridewell Street, Bristol, BS1 2AA. [REDACTED]	
<b>Summary Response</b>	
No Objection or comments	
No Objection – Subject to comments	
Object in principle	
Not acceptable in its current format	<b>X</b>

### Detailed Response

I am a Designing Out Crime Officer (DOCO) with a responsibility for Crime Prevention Through Environmental Design (CPTED) projects within the Bristol area. As a Constabulary we offer advice and guidance on how the built environment can influence crime and disorder.

Paragraphs 96, 102 and 135 of the National Planning Policy Framework December 2024 require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 111, 113, 115, 117 and 125 also require the creation of safe environments within the context of the appropriate section.

The Bristol Development Framework Core Strategy (adopted June 2011) states that one of the overarching issues for ensuring a sustainable future is reducing the opportunity for crime.

The National Model Design Code produced by the Ministry of Housing, Communities & Local Government states that all schemes should aim to create a safe and secure environment and provide a sense of security for all users (paragraph 63).

Bristol Local Plan – Site Allocations and Development Management Policies – (Adopted July 2014) section DM28: Public Realm states that development should create or

contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction. Section 4 adds that development will be expected to: Reduce crime and fear of crime by creating a well-surveyed public realm that is well managed and cared for.

**Section 17 Crime and Disorder Act 1998** places a duty on an authority to consider crime and disorder implications.

- Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,
  - (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and
  - (b) the misuse of drugs, alcohol, and other substances in its area and
  - (c) re-offending in its area and
  - (d) serious violence in its area.

(1A) The duty imposed on an authority by subsection (1) to do all it reasonably can to prevent serious violence in its area is a duty on the authority to do all it reasonably can to—

- (a) prevent people from becoming involved in serious violence in its area, and
- (b) reduce instances of serious violence in its area.

Below I have shown reported incidents for the period of one year (17.08.2024 – 17.08.2025) for an area of 400 metres x 400 metres centred on the site:

Type	Incident Count
ASB	261
Theft	194
Violence Against The Person	168
Public Order Offences	93
Arson and Criminal Damage	41
Robbery	23
Vehicle Offences	22
Sexual Offences	20
Burglary	19
Miscellaneous Crimes Against Society	16
Drug Offences	8
Crime Related Incident	7
Theft of a pedal cycle	7
Non Recordable	3
Possession of Weapons	2
Fraud	2
<b>Total</b>	<b>886</b>

Avon & Somerset Police recognise that Houses in Multiple Occupation (HMOs) are an important source of low-cost housing within the private rented sector, particularly for those on low incomes, students, supported living, young people, and vulnerable groups who cannot access other types of market or affordable housing. HMOs are also an important source of flexible housing for those seeking temporary accommodation;

however, the very nature of HMOs mean that they are designed for single occupancy with a transient occupancy.

I have viewed the planning application and have the following comments:

- There is no mention in the Cover Letter or any supporting documents as to how the applicant plans to address crime and disorder as required by the National Planning Policy Framework (NPPF) and local planning policy.

Research from Nottingham Trent University identifies those residents of a property with three or more adults experience *'Around 15% more property crimes than (otherwise identical) two adult households and their members are victims of 51% more personal crimes (Tseloni and Pease 2015).'*

Nationally, it is generally accepted that an over concentration of HMOs occurs when 10% of properties in a neighbourhood are HMOs. Research argues 10% concentration is the tipping at which HMOs may give rise to harmful effects and where neighbourhoods go from balanced to unbalanced communities (Lewisham review and Evidence paper May 2022).

It is likely that there are smaller HMOs in the vicinity that we are not able to identify due to the lack of a requirement for planning consent/licensing.

- It is not clear what the intended tenure of the development will be for. If it is for student accommodation, I would just like to mention that Home Office research shows that students are, statistically, one of the most likely groups to fall victim to crime. Students own more expensive consumer goods per head than the rest of the population. It is no surprise then that 1 in 3 students becomes the victim of a crime each year. Added to that fact, young people (aged 16- to 24-year-olds) are around three times more likely to be victims of burglary than people in other age groups, which makes students all the more vulnerable.
- Properties let in a shared capacity present different security risks from standard homes. With an HMO, not only must you provide security of an adequate nature for the overall property, you must also provide a safe method for tenants to be able to access shared areas such as hallways and landings, without the threat of unauthorised entry by unwanted visitors.
- Where access cores serve 4 or more dwellings, an access control system with entry phones linked to a main front door with electronic lock release should be provided in all dwellings in line with the Bristol City Council document Urban Living SPD (adopted November 2018). I suggest that the same proximity card or fob system is used for access to the communal areas within each HMO, including kitchen/living/dining areas, and shared bin/cycle stores and courtyard. Trade buttons should not be included in the access control system, as they have been shown to contribute to anti-social behaviour and unauthorised access to communal developments.

As tenure is unclear, I strongly recommend that occupants should not be able to auto release the front door from their rooms. Instead, they should be required to physically attend the entrance to escort visitors.

- Page 6 states that a 1.8-metre-high rendered wall will be erected to the rear of the building to separate the application site from the rear land to create an enclosed communal courtyard.

Page 18 further states the proposed rear wall will create two external amenity spaces, one for each HMO and separates the HMOs from the garden land to the rear.

It is unclear from plans submitted if the courtyard will be subdivided to serve each HMO individually or function as a shared communal space.

I do have concerns, particularly if the courtyard is intended to serve 19 occupants rather than the 9-10 individuals proposed per HMO. The shared nature of the courtyard, along with communal bin and cycle storage areas, suggests the development may operate more as a single large HMO rather than two individual large HMOs, despite the presence of separate front entrances.

- Although outside of this planning application, the Cover Letter states on page 6 that the existing metal fire escape staircase to the western side of the building will be removed to accommodate a wider pedestrian/cyclist access for the proposed rear development under separate planning application 25/11020/F.

The Proposed Site Plan - 1333-21/4000B indicates that this area is within this application site.

A gate is proposed at the end of the 1.8-metre-high rendered wall, which will separate the application site from the rear land, to provide pedestrian and cyclist access from the development behind to Fishponds Road. This gate must match the height of the proposed rendered wall, be placed as near to the front building line as possible and be of robust construction. It must be designed without finger or footholds to prevent climbing and avoid creating a recessed area that could conceal a potential offender.

Adequate lighting should also be installed to ensure residents (from the development behind) feel safe when using this access point.

- To avoid potential issues relating to parking, signage/management plan should clearly identify the intended allocation of the two parking spaces (e.g. first come, first served). Parking restrictions and usage guidelines should be included in the management plan.
- To ensure the safety of residents and reduce the fear of crime, lighting is needed to illuminate all elevations containing a doorset (dusk to dawn lighting is recommended), communal areas, bin and cycle storage areas as well as the front courtyard – particularly as there is no information that the front driveway will be secured. Good quality lighting with good uniformity will reduce the opportunities for an offender to commit crime without being seen as well as reducing the opportunity for dark spaces where an offender could hide.

Manual for streets states that *“Adequate lighting helps reduce crime and the fear of crime.”*

- It is noted that cycle storage is proposed on the eastern side of the building and is intended to be shared by both HMOs.

Due to the level of cycle theft in the Bristol area generally, the communal cycle storage area should meet the requirements of Bristol Transport Development Management Guide, Cycle parking 3.5.1. Namely, all long term cycle parking should be enclosed, secure, and weatherproofed, well illuminated and overlooked and in a convenient and safe location and must be accessed on the level and not involve the need to climb any steps/stairs or the need to carry cycles through a building.

It is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of any bicycle storage facilities and/or other areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion powered vehicles have been considered and specified.

Any visitor cycle parking must be situated in front/close to the building entrance and within lines of sight from active rooms.

The Proposed Bike Store plan - 1340-21/4501 specifies lockable solid timber boarded doors. While cycle theft in this area is low, it is increasing across Bristol, especially where surveillance and security is poor. I recommend that the doorset be certified to PAS 24:2022+A1:2024 or above.

I do have some concerns over the proposed location of the cycle storage due to limited natural surveillance. Can this be relocated. (A potential solution would be to swap its location with the bin storage area).

- Dwelling entrance doorsets - to reduce vulnerability and the opportunity for theft, all doorsets allowing direct access into the home, e.g. front and rear doors, French doors, bi-fold or sliding patio doorsets, dedicated private flat or apartment entrance doorsets, communal doorsets, easily accessible balcony doorsets etc., shall be certificated to one of the following minimum standards, or above:

**Current Standards**

- PAS 24:2022+A1:2024, or
- STS 201, or
- LPS 2081 Issue 1 Security Rating B+, or
- STS 222 Issue 4 Burglar Resistance BR2(S), or
- LPS 1175 Issue 8 Security Rating A3+, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- LPS 1673 Issue 1 Attack Rating AR.A180+.

*Easily accessible is defined within Approved Document Q Appendix A:*

- *A window or doorset, 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.*
- Windows – all easily accessible windows (including easily accessible roof windows, roof lights and roof lanterns) shall be certified to one of the following minimum standards, or above:
  - Current Standards**
    - PAS 24:2022+A1:2024, or
    - STS 204, or

- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR. A60.

**(Reference: Secured by Design, Residential (Homes) Guide 2025, Edition 1. Section 23 and Section 24.)**

- Bin storage – page 6 of The Cover Letter states that the bin store would sit behind where the plant room is currently located.

The Proposed Ground Floor plan, 1333-21/4101C and The Proposed Site plan 1333-21/4000B, would indicate that the bin store is in the front courtyard, in front of the boundary wall and hedge.

Bin storage should be in accordance with Bristol's Waste and Recycling Storage and Collection Facilities (updated March 2022).

- Each bedroom must have a robust, immovable, and lockable piece of furniture to secure valuables.
- There is no indication if CCTV will be used on site. Whilst CCTV is not a universal solution to security problems. It can help deter vandalism or burglary and assist with the identification of offenders once a crime has been committed. The provision and effective use of CCTV fits well within the overall framework of security management and is most effective when it forms *part* of an overall security plan.
- There is an emerging trend associated with the theft of post/parcels to buildings containing multiple dwellings or bedrooms. I recommend any communal mailbox delivery facilities meet the requirements of TS 009, which provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter mail delivery i.e. arson and identity theft. A secure parcel locker may also be a consideration and if CCTV is installed, have a dedicated camera.
- Although the applicant is obliged to adhere to the Bristol City Council Mandatory HMO Licensing Scheme, which does mention the need to address any anti-social behaviour, there must be a management plan in place to address:
  - Dealing with anti-social behaviour
  - Security
  - Visitor access
  - Parking restrictions
  - Mail and parcel delivery
  - Building repairs and maintenance e.g. lights, CCTV (if installed), cleaning etc.
- Avon and Somerset Constabulary operates the Secured by Design (SBD) initiative. This is a scheme which promotes the inclusion of architectural crime prevention measures into new projects. Implementing Secured by Design has proved to reduce the number of burglaries where it has been implemented. Further information on the Secured by Design initiative may be found at - [Secured by Design - Secured by Design](#). I can assist with this process.

At this stage, I judge this application to be, 'Not acceptable in its current format.' Whilst the Police are not formally objecting to the proposed development, I have significant concerns around safety. Further details are required in relation to the above comments. This is particularly important given the possible vulnerabilities of the intended occupants and crime levels in the area. Without this detail, I am unable to determine whether the application has fully met the safety and security requirements of the National Planning Policy Framework (NPPF) or the Bristol Local Plan.

If there are any questions concerning these comments, then please feel free to contact me.



Designing Out Crime Officer