



Crime Prevention Through Environmental Design Planning Response

Site Address – The Assembly 110 - 112 East Street Bedminster Bristol BS3 4EY	App. Ref – 25/13462/PINS
Development description – Application for Planning permission for Demolition of the rear extensions and construction of a large HMO (Sui Generis). Change of use of remaining ground floor unit from public house to a commercial unit (Use Class E).	Response Date – 04/09/2025
Designing Out Crime Officer – Charlotte Thompson Crime Prevention Unit Avon and Somerset Police, The Bridewell, 1-2 Bridewell Street, Bristol, BS1 2AA. Mobile [REDACTED] Email: [REDACTED]	
Summary Response	
No Objection or comments	
No Objection – Subject to comments	
Object in principle	
Not acceptable in its current format	X

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 (14.08.2024 – 14.08.2025) for an area of 400 metres x 400 metres centred on the site:

Type	Incident Count
ASB	431
Violence Against The Person	319
Theft	200
Public Order Offences	138
Vehicle Offences	79
Arson and Criminal Damage	77
Burglary	52
Sexual Offences	40
Robbery	32
Theft of a pedal cycle	26
Drug Offences	12
Miscellaneous Crimes Against Society	9
Crime Related Incident	7
Non Recordable	3
Fraud	3
Possession of Weapons	2
Total	1,430

A&S Police recognise that HMOs are an important source of low-cost housing within the private rented sector, particularly for those on low incomes, students, 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 Design and Access Statement (DAS) 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. 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.
- 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.

Secured by Design: A proven crime deterrent: *Over the past three decades, numerous research projects have consistently highlighted the effectiveness of properties built or refurbished to Secured by Design (SBD) standards in deterring crime. A comprehensive review of nine such studies in 2024 revealed a significant trend: developments certified by SBD experienced, on average, 65% fewer burglaries compared to those not built to the same rigorous standards.*

One particularly striking study showcased an even greater impact, demonstrating an 87% reduction in overall crime and a remarkable 91% decrease in burglaries within SBD-compliant properties. These findings underscore the tangible benefits

of SBD, creating safer environments for residents and easing the strain on local housing providers and police resources.

- 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/fob system is used for access to all communal facilities, including kitchenettes, laundry, bin, and cycle stores, as well as the main kitchen/dining area. There must not be any trade buttons on the access control system as these have been shown to cause issues of anti-social behaviour and unauthorised access.

As tenure is unclear, I strongly recommend that residents should not be able to auto release the front door from their room. Instead, they should go to the entrance to admit and escort their visitor(s).

- Due to the level of cycle theft in the Bristol area generally, the communal cycle stores 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.

- Bin storage areas should be in accordance with Bristol's Waste and Recycling Storage and Collection Facilities (updated March 2022).
- It is noted that outdoor lighting is proposed for the development. To aid surveillance and help residents and their visitors feel safe, lighting should be installed at the entrances to the HMOs, all elevations, and communal areas as well as bin and cycle storage locations.

Good quality lighting with good uniformity will reduce the opportunities for an offender to commit crime without being seen and challenged 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."*

- Each bedroom must have a robust, immovable, and lockable piece of furniture to secure valuables.
- It is noted that CCTV is being proposed. 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. I suggest that CCTV is also covered in the management plan to ensure that the system is maintained and effectively monitored. CCTV should not only provide coverage to communal areas but also cycle and bin stores, which will mitigate potential problems with cycle theft and misuse of bin stores (fly tipping, rough sleeping etc.)

- The images showing the view along Herbert Street (copied below), looking southwest, and the entrance to the site from Herbert Street suggest that no boundary fencing or pedestrian gate is planned to restrict access. Without this, the site is vulnerable to unauthorised access and tailgating, which increases the risk of burglary and theft.

Whilst the planting will take time to establish, the entrance is sufficiently wide enough to allow vehicular access, which raises concerns about unauthorised parking and vehicles being left in this area. Given the limited parking availability in this location, it is highly likely that vehicles will enter the development, park inappropriately, and cause obstruction or nuisance to residents and their legitimate visitors. This may result in Police involvement due to complaints.



Fig. 40 Entrance to the site from Herbert Street



Fig. 43 View along Herbert Street looking South West

There is no public amenity space within this development, and no footpaths that require permeability. Therefore, there is no justification for access by individuals other than residents. To mitigate these risks, I strongly recommend the installation of a gate restricting both vehicular and pedestrian access to residents.

How does the applicant intend to manage this access point; further clarification is needed.

If this access point remains unsecured, and given the crime statistics for this area, I recommend that all ground floor doors and windows should be certified to one of the following minimum standards (including bin stores).

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.)

Additionally, CCTV coverage achieving 'identification' quality, as defined in the Home Office Guide 28/09, should be considered for this area to support monitoring and deterrence.

- I recommend keeping planting to no higher than 1 metre from the ground up and trees should have no foliage below 2 metres. This will aid natural surveillance and will avoid the creation of potential hiding places. A robust management plan will need to be in place to ensure this is maintained.
- 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 together with a dedicated CCTV camera on this.
- There is a lack of defensible space around the main entrance off Herbert Street. The vicinity does suffer with graffiti and low-level tagging. To mitigate this, I recommend vulnerable elevations have a wall finish applied that allows for the easy removal of graffiti.
- 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
 - Mail and parcel delivery
 - Building repairs and maintenance e.g. lights, CCTV, cleaning etc.
- **Should planning consent be granted, I respectfully request that achieving Secured by Design Silver is made a condition of planning, this would**

ensure minimum standards of physical security in an area with not insignificant levels of crime and anti-social behaviour.

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](#)

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



Designing Out Crime Officer