



Crime Prevention Through Environmental Design Planning Response

Site Address – 11 - 13 Whiteladies Road Bristol BS8 1PB	App. Ref – 25/13554/PINS
Development description – Application for Planning permission for Change of use from office to provide 20 no. purpose-built student units and associated works.	Response Date – 24/09/2025
Designing Out Crime Officer – [REDACTED] 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	X
Object in principle	
Not acceptable in its current format	

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 (15.09.2024 – 15.09.2025) for an area of 400 metres x 400 metres centred on the site:

Type	Incident Count
Theft	199
Violence Against The Person	148
ASB	132
Public Order Offences	64
Vehicle Offences	59
Arson and Criminal Damage	37
Theft of a pedal cycle	34
Burglary	20
Sexual Offences	19
Robbery	18
Crime Related Incident	9
Drug Offences	7
Miscellaneous Crimes Against Society	6
Non Recordable	3
Fraud	2
Total	757

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-old) are around three times more likely to be victims of burglary than people in other age groups, which makes students all the more vulnerable.*

One of the biggest concerns for both students and parents is making sure the student accommodation supports a safe and secure environment, safety and security should always be a top priority, and purpose-built student accommodation should deliver just that.

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

- 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.

Tradesperson button must not be used as they have been shown to be the cause of anti-social behaviour and unlawful access to communal developments. It is also recommended that students meet their visitors at the building entrance.

- Thieves continue to target high-value cycles in Bristol, which we know is a key driver of this crime type. Cycles are mentioned in 40% of all burglary reports. Multi-occupancy residences, including flats and student accommodation, are particularly vulnerable where insufficient regard is given to implementing appropriate security measures. I advise that such storage meets BCC Guide to Cycle Parking 3.5.1, namely:
 - For flats or student accommodation, cycle stands within a lockable, covered enclosure are required. Internal communal cycle stores should be fitted with a secure door, which should trigger an alarm if forced or left insecure.
 - It is noted that the cycle parking is currently proposed at the rear of the development. To enhance natural surveillance and reduce the risk of theft, I recommend relocating the cycle store to the front of the development, where it will benefit from increased visibility and footfall.
 - If the cycle storage area cannot be relocated to the front, it may be necessary to install a dedicated CCTV camera as a deterrent to vandalism or theft.
 - Any visitor cycle parking must be situated at the front of, or close to, the building entrance and within sight lines from active rooms and balconies.
- Landscaping should not restrict natural surveillance and should work in conjunction with the lighting scheme and CCTV (if installed). Planting between the existing wall and parking spaces at the front should be limited to species with a mature height growth of less than 1 metre, to avoid reducing natural surveillance.
- It is noted that the refuse storage will be in accordance with Bristol's Waste and Recycling Storage and Collection Facilities (updated March 2022).
- A suitable level of lighting should also be provided for the entrances/exits, to increase visibility and reduce the fear of crime. Lighting should complement the CCTV (if installed) and landscape provision.
- Each student bedroom must have a lockable cabinet to secure valuables.
- The vicinity does experience graffiti and low-level tagging. I recommend that vulnerable elevations have a wall finish applied that allows for easy removal of graffiti, especially as there is no entry restriction at the front.

- As there are no restrictions on vehicular or pedestrian access at the front of the development, and given the crime statistics for this area, I consider all ground-floor/basement windows and doorsets to be vulnerable. I therefore recommend that all ground-floor/basement windows and doorsets be certified to one of the following minimum standards.

As this proposed development sits within a conservation area, I understand that there will be associated restrictions on the change in style of windows and doors, wherever practicably possible the applicant should consider:

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

- It is noted on page 18 of the Planning Statement that the applicant is content to accept a condition requiring the production and adoption of a Student

Management Plan, to ensure the 'character and locality' can remain unharmed. This plan should also incorporate the following measures:

- Reception facilities and operating hours
 - Out-of-hours staff contact details
 - Procedures for addressing anti-social behaviour
 - Security measures
 - Move-in/move-out process
 - Visitor access
 - Maintenance and repair procedures (e.g., lighting, CCTV)
 - Handling of mail and parcels
 - Cycle security maintenance, including initiatives to encourage students to register their cycles with Bike Register and/or Immobilise to help deter theft.
- With no vehicular access control measures in place at the front of the development, unallocated parking in a densely populated area (as is the case here) can lead to disputes between neighbours and may result in anti-social behaviour or criminal damage. Parking is extremely limited both on-site and in the surrounding area, so it is likely that vehicles will enter the development, park, and cause obstructions to emergency vehicles. This can also create a nuisance for residents and their legitimate visitors. These issues may result in the Police being contacted.

I recommend that parking spaces be allocated to individual residents, with appropriate restrictions placed on visitor parking where applicable. These restrictions, along with details on how parking will be used for servicing functions and the move-in/move-out process, should be clearly outlined in the Student Management Plan. To avoid potential confusion or misuse, both signage and the management plan should clearly communicate the intended allocation of parking spaces (e.g., first come, first served).

- There is an emerging trend of post and parcel theft in buildings containing multiple dwellings or bedrooms. I recommend that any communal mailbox delivery facilities comply with the requirements of TS 009, which offers the most secure method for mail delivery while mitigating risks such as arson and identity theft. The installation of a secure parcel locker should also be considered, and if implemented, the area should be monitored by a dedicated CCTV camera (if installed).
- Whilst a CCTV system cannot address every aspect of security, it can help deter crime and anti-social behaviour, assist with the identification of offenders, promote personal safety, and provide reassurance to both residents and visitors. It can also form an invaluable element within a comprehensive security strategy as long as the specification and installation meet the users Operational Requirement. It is unclear whether CCTV will be installed. Should it be installed, I recommend the system be capable of capturing 'identification' quality images as defined in the Surveillance Commissioners CCTV Buyers Toolkit. The system must function with any landscaping and lighting schemes.
- Avon and Somerset Constabulary operates the Secured by Design 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
www.securedbydesign.com I can help the applicant with this.

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



Designing Out Crime Officer