



Crime Prevention Through Environmental Design Planning Response

Site Address – 203 Church Road, Redfield BS5 9HL	App. Ref – 22/06037/F
Development description – Proposed change of use and extension of existing building to create a scheme of 13 x HMO cluster units (44 bed) together with associated gym and communal workspace facilities 9 Sui Generis). Change of use of drinking establishment floorspace (Sui Generis) to commercial floorspace (Sui Generis)	Response Date –
Crime Prevention Design Advisor – Clare Hawkins - Local Support Team – Bristol	
Summary Response	
No Objection or comments	
No Objection – Subject to comments	
Object in principle	X
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 92, 97 and 130 of the National Planning Policy Framework (adopted July 2021) require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 97, 106, 108, 110, 112 and 119 (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.

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.

(1) 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.

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.

Neither the Design and Access statement nor the Planning Statement make any reference to crime and disorder.

Crime figures, taken from Police systems, for a 200m radius from the proposed development site, for a 12 month period to 26.01.23 are detailed below;

Anti-social behaviour	89
Violence against the person	88
Public order offence	26
Theft	23
Vehicle offences	16
Burglary	12
Arson and criminal damage	9
Theft of pedal cycle	6

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

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 above location immediately neighbours a stretch of Church Road which is the subject of a Police problem solving plan due to consistent anti-social behaviour.

There has been concerted partnership working between the Police, local community, and the street intervention team (BCC) to try and address the anti-social behaviour being conducted in this area.

The Avon and Somerset Police anti-social behaviour coordinator for the locality has commented.

Church Road is currently an ASB hot spot, and the neighbourhood beat teams & anti-social behaviour team focus a large amount of attention on problem solving the ongoing ASB in the area. The ASB is often linked to street drinking, begging and general rowdy behaviour. The local businesses report how their businesses are affected by the ASB and prevents the community wanting to visit their businesses,

we have also had similar reports from the community outlining how unsafe they feel accessing Church Road because of the ongoing ASB. I am concerned that a 44 bed HMO would cause additional worry to the community and add to the ongoing ASB in the area which we are trying to tackle.

Neighbourhood Officers also comment;

'I have been the Police Community Support Officer covering the area of St George including Church Road for the last 4 and half years. During this time Church Road has always been an area which has drawn heavily on resources, myself and my team spend a larger amount of time in this area than other locations on our beat. We regularly have incidents of Anti-Social behaviour, this is partially due to the make-up of the area, with offenders being drawn to the pubs, take aways and numerous off-licenses in this location. We regularly receive calls regarding the impact this is having on local residents.

In addition, an application (20/06252/F) for HMO of 2 x eight bed apartments and 1 x 4-bedroom apartment (16 rooms) has been approved, approx. 170 yds away, at 163A Church Road with the possibility that there are smaller HMO's also in the vicinity that we are not able to identify due to the lack of a requirement for planning consent /licensing.

The very nature of an HMO means that they are designed for single occupancy with a transient occupancy.

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).

There is also evidence to suggest that instances of non-domestic violence are more prevalent in HMO's [nondom violence HMO.pdf](#).

Although the applicant would be obliged to adhere to the BCC mandatory HMO licensing scheme, which does mention the need to address any anti-social behaviour, I do not accept that this would be adequate to ensure the **long-term guardianship** of an HMO of this size, or mitigate the demand on Police resources in this location.

Clare Hawkins

Designing Out Crime team supervisor