

Case Officer: Chris Cummings  
Planning Department  
Exeter City Council

Kris Calderhead  
Designing Out Crime Officer  
Exeter Police Station  
Sidmouth Road  
Exeter EX2 7RY

Date: 03/04/24

Dear Mr Cummings,

**23/0949/FUL Repair Garage And 81 Victoria Street, Exeter, Devon, EX4 6JG.  
Demolition of existing buildings and dwelling and redevelopment of site to provide  
101-bed co-living accommodation with associated accesses/egresses, landscaping  
and other external works (Revised)**

Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on the revised plans of this application.

I have included below an extract from my previous response relating to the concept of co-living and concerns I have.

### **Co-Living**

*The concept of co-living is relatively new within Exeter and as far as I am aware, whilst there are numerous and an increasing number of similar schemes being progressed, there are none that have been completed and occupied. Therefore, the success of them within the city remains somewhat unknown.*

*My concern with the concept is that its success is largely dependent on creating a cohesive community and ensuring the development is well managed. However, the nature of the typical resident such a scheme is aimed at, young professionals, suggests a somewhat transient population with shorter tenancies, therefore creating a feeling of community may prove difficult. A lack of community or ownership can lead to areas being less cared for as residents don't feel responsibility for or investment in such space, which can cause problems.*

*Whilst co-living might be viewed as a means of providing more suitable accommodation for such a demographic, should this population continue to move elsewhere, it could result in lower occupancy and residents with a wide mix of lifestyles, health needs, dependencies, safeguarding issues etc. living in very close proximity whilst sharing communal space which could cause conflict. How is it envisaged that this risk will be managed? What vetting of potential residents will be carried out?*

*Houses of Multiple Occupancy (HMOs) can unfortunately attract higher levels of crime and ASB compared with non-sharing living arrangements, I suggest in part due to some of the points outlined above. Co-living schemes are in effect large HMOs, so if applications progress, they must consider security and opportunities to reduce crime and ASB.*

I am still unsure how such issues and points will be addressed and perceived risks mitigated.

Should the application progress, I respectfully request that the following conditions are considered:

### Conditions

1. **Condition:** A management plan to be in place that includes due consideration for staffing, management of ASB, security and incident management, vetting of residents, tenancy agreements, unacceptable behaviour etc.  
**Reason:** In order to reduce the likelihood of crime, conflict, disorder and anti-social behaviour and to enhance the safety of residents of the scheme.
2. **Condition:** On-site management 24 hours a day, 365 days a year is maintained indefinitely, as is the vetting of potential tenants.  
**Reason:** In order to reduce the likelihood of crime, conflict, disorder and anti-social behaviour and to enhance the safety of residents of the scheme.
3. **Condition:** CCTV with a clear Operation Requirement to be distributed throughout the development.  
**Reason:** In order to help prevent/detect crime, disorder and anti-social behaviour.
4. **Condition:** Access control measures must be in place to prevent casual intrusion beyond public space and into private space, this includes no trades person access for mail delivery or utility readings.  
**Reason:** To prevent unlawful access to private/semi-private space and thus reduce the likelihood of crime, conflict, disorder and anti-social behaviour.
5. **Condition:** External lighting should meet BS5489-1:2020.  
**Reason:** An effective lighting scheme affects 6 out of the 7 Crime Prevention Through Environmental Design principles<sup>1</sup>. It is therefore essential to creating a safe environment.

### Further Recommendations

- Passive surveillance provided by legitimate users of the site should be significant, particularly with the installation of an effective lighting scheme. However, I recommend that CCTV is installed throughout as per condition 3. A clear Passport for Compliance document, including an Operational Requirement should be in place prior to installation. Entry/exits points, access control areas, cycle/bin storage, circulation routes and amenity spaces are areas of particular importance for coverage with effective monitoring.

The following advice is given in respect of any CCTV installed:

- Cameras, wiring and recording or monitoring equipment should be secured. CCTV should be designed in co-ordination with external lighting and landscaping.
- The CCTV must have a recording format that is acceptable to the Police. Recorded images must be of evidential quality if intended for prosecution.
- Any CCTV is advised to be installed to BS EN 50132-7: CCTV surveillance systems for use in security applications.
- CCTV systems may have to be registered with the Information Commissioners Office (IOC) and be compliant with guidelines in respect to

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<sup>1</sup> Safer Places – The Planning System and Crime Prevention, Home Office 2004

Data Protection and Human Rights legislation. Further information is available via [www.ico.gov.uk](http://www.ico.gov.uk)

- For guidance on the use of CCTV images as legal evidence see also BS 7958:2005 CCTV Management and Operation Code of Practice.
- As per condition 4, it is vital that access to the residential parts of the development is restricted to residents and that casual intrusion is prevented. If communal areas, landings, stairwells, corridors etc. are compromised then they can attract ASB, particularly in a location on the outskirts of the city centre. Therefore, unlawful free movement throughout the block should be prevented with the use of an appropriate access control system, door entry system and compartmentalisation. This will hold potential intruders who may have tailgated through ground floor security measures so they cannot freely access the remainder of the development.
- The blank north-west elevation of the central block would benefit from a buffer / landscaping that will deter graffiti.
- Bin and cycle stores should be lit at night using vandal resistant light fittings and energy efficient LED lights.
- 24-hour internal lighting (switched using a photoelectric cell) to communal parts of the development should be installed. This includes the communal entrance halls, landings, corridors, stairwells and all entrance/exit points. Consider lighting systems that reduce light levels during quieter periods to save energy.
- All hard landscaping features and any items of street furniture should be securely fixed to prevent their removal or damage through vandalism.

Yours sincerely

Kris Calderhead  
Designing Out Crime Officer