



**STAFFORDSHIRE
POLICE**

Planning Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffs
ST13 6HQ

Ground Floor, Block 9
Staffordshire Police HQ
Weston Road
Stafford
ST18 0YY

Date: 26th April 2021

Application: SMD/2021/0113
Location: Land at Bridge End, Macclesfield Road, Leek
Proposal: Erection of 12 bungalows

The following comments should be considered in the light of the following:

- The National Planning Policy Framework states "Planning policies and decisions should ensure that developments ... create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience";
 - National Planning Practice Guidance which states that "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
 - SMDC Core Strategy Policy C1 –"Require development proposals to incorporate high quality locally distinctive design features and layouts that will reduce crime and the fear of crime and support inclusive communities, particularly in terms of accessibility and functionality in line with the Council's Design SPD";
 - The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998;
 - The 2006 CABE document entitled 'Design and Access Statements: How to Write, Read and Use Them', which states "Statements should demonstrate how development can create accessible and safe environments, including addressing crime and disorder and fear of crime."
1. The Design and Access Statement makes the point that the principle of residential development on this site has already been established by the previous 2013 application that was approved on appeal. Assuming this supposition is correct, in terms of addressing the potential for crime or disorder, the proposed layout will be an important consideration. Unfortunately, there are aspects of it, which are contrary to best practice and some reworking of the layout is recommended. With its current layout, Staffordshire Police are unable to recommend approval.
 2. Additionally, vehicle access through Bridge End will not be straightforward given the number of vehicles which are regularly parked there, presumably belonging to existing residents and perhaps employees of the neighbouring chemical works. There will be a need for the applicant to demonstrate that existing resident parking provision will not be compromised and given current parking levels that safe passage of vehicles (which could include delivery vans etc) moving in opposite directions along Bridge End and up to the new development will be possible as well as allowing for continued safe pedestrian movement, the latter currently being possible.
 3. The cricket club car park has been misused out of hours in the past by outsiders. As such, the cricket club has taken steps to restrict vehicle access to it by installing a gate from the Highfield access. It will be important that unrestricted vehicle access to this car park should not be possible from the Bridge End direction. Whether this will be down to the cricket club to provide a suitable barrier is unclear.
 4. The site will benefit from potentially good external boundaries in the main. The topography to the west and south (coupled with suitable rear garden boundaries) will prevent on-foot approach from those directions. The long existing field boundary along the north/north-east with fencing embedded and the same for the south-east should likewise provide robust site/rear garden boundaries.

5. In terms of layout, the primary concern relates to the poor relationship between the dwellings and the internal access road, particularly with regard to natural surveillance. There are issues around the orientation of dwellings, internal dwelling layout, blank gables, some garage positioning and ultimately a lack of a sense of place/community that might arise from these.
6. The site entrance will be poorly defined and not overlooked with a double garage (plot 1) being the primary focus. Looking at the respective plots as they relate to the access road, the only plot that will have any direct natural surveillance over part of it from a habitable room (kitchen, living room, dining room) will be plot 4. Plot 1 faces the wrong direction for this and the garage will block views too. Plots 2-3 and 7-8 have bedrooms at the front of the dwellings. Plots 9-10 face the wrong direction to provide any such overlooking and plot 10 presents a blank gable to the road. Presumably there will be a 1.8m high fence at back of pavement anyway to provide a secure rear garden for plot 10. At best, plots 11-12 will provide an oblique view of the access road with plot 12 also having a blank gable facing the road. The habitable rooms at the front of plot 5 will face the fence separating plots 5 and 6 and those of plot 6 will hopefully overlook the connecting footpath, but not the access road. Question 7c in Building for Life 12 asks 'Do all fronts of buildings, including front doors and habitable rooms, face the street?' Clearly not with these proposals. Natural surveillance over the street and between dwellings will be severely compromised, and indeed, in order for there to be secure rear gardens, sizeable sections of the access road will have 1.8m fencing abutting it.
7. Given the benefits of the good external site boundaries (in the main) and overall shape of the site, there would appear to be considerable scope to amend the layout to address the deficiencies above. This may necessitate changes to dwellings types (including internal layouts) too. Ultimately it should be possible to provide a layout where dwellings much more effectively address and overlook the internal access road, provide mutual security between dwellings and foster a greater sense of community.
8. The Proposed Site Plan is also deficient in terms of confirming there will be secure rear gardens. Unauthorised access from the front of dwellings to the private rear gardens will need to be prevented by the placement of suitably robust 1.8m high fencing and lockable gating as close to the building line as possible. The rear gardens boundaries of plots 2-4 which abut the no-build zone will unfortunately be exposed. This space could become a small makeshift football pitch, which may have an impact upon those dwellings abutting it. Defensive planting/hedging can be a very effective means of protecting rear garden boundaries which are more exposed/abut public space. Furthermore, such planting can soften the appearance of fencing/walls as well as having a range of ecological benefits and should therefore be considered by the applicant.
9. In purely crime prevention terms, dispensing with the proposed connecting footpath in the south-east corner and having a conventional non-leaky cul-de-sac would reduce criminal opportunity directed at the development. However, it is acknowledged that the ability for residents to have direct and level access to the open space (and views) to the east will be very beneficial and on the balance of probabilities this is likely to outweigh any possible negative crime impact. This footpath link will need to be well overlooked. The fact that this linkage will have a pedestrian gate is welcomed. Adding 'Private-Residents Only' type signage to it should be considered to discourage casual intrusion into the site.
10. The applicant is advised that from the viewpoint of Staffordshire Police and undoubtedly for the long-term benefit of the future residents, it would be highly desirable for the dwellings to meet the minimum physical security requirements contained within the Secured by Design Homes 2019 design guide (or latest iteration). Specifically this would be external doorsets and ground floor/accessible windows (and ideally garage doorsets), which have been tested and importantly, possess third party certification from a UKAS-accreditation body to a recognised manual attack-resistant security standard. This would be one further significant way in which the applicant could seek to design out criminal opportunity. Such third party certified doorsets and windows are widely available and provide a proven and demonstrable level of manual attack-resistance, whereas non-certified products offer no such assurance, and introduce an easily avoided and unnecessary vulnerability. As well as providing comprehensive information about aspects of physical security including security standards, the Homes 2019 design guide contains a raft of other information including security-related layout considerations, which could benefit the applicant. For the above reasons, their attention is directed to it.

11. If obstacles can be overcome and the development ultimately meets with approval, it is requested that an informative note for the applicant is attached to the bottom of the decision notice directing them to advice on construction site security. Wording along the lines of the following would be ideal - 'For online advice on construction site security, the applicant's attention is directed to the following publications from recognised bodies - The British Security Industry Association's 'Construction Site Security – A Guide' and Secured by Design's 'Construction Site Security Guide 2021'.'

Crime Prevention advice is given freely without the intention of creating a contract, and all comments and recommendations are site specific. Staffordshire Police and the Home Office do not accept any legal responsibility for the advice given.

David Elkington
Crime Prevention Design Advisor
Early Intervention and Prevention Unit