



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

Early Intervention & Prevention Unit
Ground Floor, Block 9
Staffordshire Police HQ
Weston Road
Stafford
ST18 0YY

Date: 25th June 2021

Application: SMD/2021/0290
Location: Nab Hill House, Nab Hill Avenue, Leek
Proposal: Change of Use from dwelling (Use Class C3) to a residential care home (Use Class C2) for up to 6 residents

The proposal has been reviewed with particular reference to Police CPI's Secured by Design guidance and in accordance with the recognised principles of Crime Prevention Through Environmental Design.

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

- Under the heading Promoting Safe and Healthy Communities, Para 91(b) of the NPPF states "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion."
- Under the heading Achieving Well-Designed Places, Para 127(f) of the NPPF 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."
- Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
- Staffordshire Moorlands Local Plan - Design Consideration, Spatial Objective SO10 –"To deliver sustainable, inclusive, healthy and safe communities";
- 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 submission of the above planning application is noted.

As with all residential children's care homes, albeit not limited to the following points, a tremendous amount of its success in addressing the needs of the children and avoidance of a detrimental impact upon a locality will depend upon:

- the experience, professionalism and care of the staff;
- suitable staffing levels and effective management oversight;
- the placement of appropriately risk-assessed children with suitable individual care plans in place;
- the nature of the children housed and the extent to which they get on with each other/are not a bad influence upon one another;
- well-conceived and enforced rule setting, and expectations placed upon resident children;
- all backed up by robust and effective staff policies (including in-house conflict resolution), practices and operating procedures.

The residential care home would need to be registered with Ofsted, who are the appropriate regulatory authority and subsequently regulated by them with all the necessary checks and balances in place that they require to ensure the efficient running and management of the home for the benefit of those children who would be placed there. It is noted that this home would be for up to 6 children, which is more than many typical children's care homes. While there will be no automatic direct correlation between the number of children housed and any challenges faced, it may be reasoned that in general, the greater number of children, the greater the number of variables that may come into play and need to be suitably managed.

The view of the Staffordshire Police Neighbourhood Policing Team has been sought and can be summarised as follows:

- Of note, this would be the 39th children's care home on the Moorlands. While the majority don't cause any concern for the Police, a number can be quite time consuming due to associated incidents.
- One issue is children who on occasion, for a variety of reasons, go missing from such homes. This can be a safeguarding concern and potentially exposes them to heightened risk. This can also place a demand upon limited police resources where searches are required to be undertaken. There are extensive transport links nearby which could enable absconding children to leave the immediate area travelling into Stoke-on-Trent or further afield including to other counties. The track to Rudyard is very close by and there are other large open spaces too to cover should an extensive area search be required.
- There are a number of local schools nearby. In the light of this, it would be the expectation that children placed at the home would be suitably risk assessed in terms of child sexual exploitation to safeguard local children.

Ensuring that boundary treatments are made suitably robust to reduce any undue negative impact upon adjoining neighbouring properties and the ease with which children could abscond and disappear quickly would be advisable. Regarding the latter, this would be particularly relevant for the Kiln Lane boundary and green space to the south.

Consideration should also be given to the use of CCTV surveillance cameras at the location, which could be a useful aid to help oversee the management of the site, safeguard the children living there, discourage unwanted outside interaction with the location, and can assist should any children go missing with timing, direction of travel, clothes worn etc. Should this application meet with Local Authority approval, it would be ideal if the requirement for a CCTV camera system could be conditioned.

The applicant's attention is brought to the Surveillance Camera Commissioner Buyers Toolkit - an excellent guidance document that should help inform decision making when it comes to considering the installation of a CCTV surveillance system. It is a comprehensive easy-to-follow guide for non-experts thinking about buying a CCTV surveillance camera system and want to ensure they avoid common mistakes and buy an effective system that does what they want it to do. It discusses the importance of having an Operational Requirement from the outset and it is full of advice and tips on how to get the best out of any prospective supplier. It also covers relevant standards and certification, and current legislation.

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 Elington
Crime Prevention Design Advisor