



**STAFFORDSHIRE
POLICE**

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Early Intervention & Prevention Unit
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ST18 0YY

Date: 12th July 2021

Application: SMD/2021/0418
Location: Land South-East of A521 Uttoxeter Road, Draycott in the Moors
Proposal: Full planning application for residential development of 200 dwellings (Use Class C3), access and internal roads for vehicles, footpaths and cycle linkages, parking, public open space and landscaping, ecological habitats, community orchard, sustainable drainage measures, and associated infrastructure and earthworks.

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 2006 CABI 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."

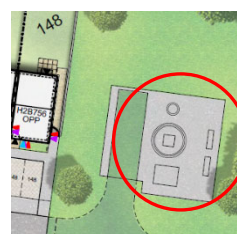
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1. Staffordshire Police are generally very supportive of the layout proposals for this phase 2 development. Crime prevention aspects have clearly been well considered, borne out in the Proposed Site Plan and accompanying documentation.
 2. The minimal site access arrangements are such that unwanted attention from outsiders should be very limited. The mutually secure arrangement of rear gardens backing onto one another with outward-facing dwellings addressing the street is ideal. Natural surveillance from dwellings over public open space, the vehicle and pedestrian movement network, the two LEAPs, much of the parking and between dwellings should be good aided by dual aspect corner plots and habitable

rooms at the front of dwellings. Generally boundary treatments appear to be suitably robust. The widespread inclusion of external defensible hedge planting to provide a buffer for rear garden boundaries that abut publically accessible space is welcomed. Aside from the aesthetic/ecological and graffiti/nuisance reduction benefits, this will enhance dwelling security markedly, if well undertaken and maintained. Space appears to be well defined throughout the development with no segregated unoverlooked footpaths or obvious locations that might attract anti-social behaviour. Any rear paths to dwellings are gated to restrict access and the inclusion of anchor points for cycles etc within lockable rear garden sheds is noted. The road network is such that vehicle speeds should be kept relatively low, which will provide a safer environment for pedestrians and reduce opportunities for nuisance driving. All in all it is likely to be a development perceived to be under the ownership and control of its residents, which should deter negative interaction with it from outsiders.

3. While the layout proposals appear to be very positive, there are nevertheless a number of queries and recommendations Staffordshire Police would draw to the attention of the applicant and the Local Authority for clarification and ideally actioning.

- i. Regarding the widespread use of defensible hedge planting for potentially more vulnerable rear garden boundaries, unless mistaken, the side garden boundaries for plots 148/149 which will abut the open parkland will not benefit from this approach. Clearly protective planting here should also be considered.

- ii. While the plans are generally very explanatory and legible, one feature (circled opposite) in reasonably close proximity to plot 148 is unspecified. As such, it is impossible to determine whether it could be problematic in any way, attract gathering etc.



- iii. Secured by Design Homes 2019 design guidance recommends, "Where parking is designed to be adjacent to or between units [as will be the case within this development], a gable end window should be considered to allow residents an unrestricted view over their vehicles". The applicant should endeavour to ensure that such opportunities are maximised while not compromising privacy.
- iv. Plots 162-163 should potentially provide a good level of natural surveillance over the southern LEAP. However, visitor parking spaces between the two elements may reduce this. Consideration should be given to relocating these spaces to maximise overlooking opportunities.
- v. The lighting proposals here appear to be lacking. A combination of BS5489-1:2020 street lighting supplemented by dwelling mounted lighting can play an important role in providing a safe living environment and further reduce opportunities for crime and anti-social behaviour. A well-designed lighting scheme would address this and not conflict with ecological considerations as long as it is undertaken by a lighting designer who can demonstrate suitable professional competency for this type of development coupled with relevant years of experience. The Local Planning Authority should satisfy itself that this will be the case.
- vi. Section 4.9 of the Design and Access Statement discusses the seven attributes of sustainable communities that have been identified as being particularly relevant to crime prevention, one of these being physical protection (of dwellings/properties and spaces). Building on the sound layout and boundary treatments, 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 satisfy the minimum physical security requirements contained within the Secured by Design Homes 2019 design guide (or latest version). Of particular importance would be external doorsets, ground floor/accessible windows and 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, satisfy rigorous performance standards (aside from security ones), 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.

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

PS. Should this application ultimately meet 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'.'