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Date: 23rd August 2021

Application: SMD/2021/0441
Location: Compton Mill, Compton, Leek
Proposal: Erection of 57 over-65 retirement living apartments, together with external amenity space, parking and associated facilities

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 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."

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1. In principle, the provision of a block of retirement living apartments would appear to make very good use of this vacant brownfield plot close to Leek town centre. Unfortunately, it has not been possible to open all relevant documents online to gain a full understanding of the proposals, specifically the DAS Parts 1 and 2 which only generate blank white pages despite repeated attempts.
 2. It will be very important for the residents, who all be over-65 that every effort is made to reduce the likelihood of any unwanted negative interaction with the site. The level of natural surveillance out from the complex and towards it from Compton and Duke Street should be good, which should deter negative interaction but will not necessarily prevent it. To rely solely upon natural surveillance and the residents to report issues would be somewhat naive. Site boundaries will

need to discourage easy approach by outsiders to the relevant lower ground and ground floor apartment windows to aid privacy, security and deter nuisance behaviour.

3. One significant way of deterring negative interaction is to control the amount of access to the site. The main combined Duke Street vehicle/pedestrian entrance will be open and overlooked by housing opposite as well as from some apartments allowing access for all. Providing unrestricted site access clearly comes with some inherent vulnerability attached and degree of risk acceptance. However, of particular concern is the pedestrian access at the quieter opposite end of the site (Cornhill Street), which as it stands will provide an uncontrolled through route and opportunity for anti-social behaviour within the grounds. Will the pergolas close by in the north-east corner have seating, which might attract gathering? The proposed nature of the Cornhill Street boundary is a little vague, but it needs to be of a design and height which deters casual intrusion. Defensive planting could be also used to supplement this and reinforce this boundary line.
4. In addition to this, Staffordshire Police strongly recommend that a robust access controlled pedestrian gate comprising an anti-climb design and of a suitable height is incorporated at the boundary for the Cornhill Street link, which would enable residents to come and go to the town centre (via the steps down to Broad Street), but prevent casual intrusion into the site by outsiders and the undesirable through route. This would be an obvious way in which the applicant could design out some anti-social and criminal opportunity for the benefit of the residents. The aim should be that anyone casually intruding into the site via the open Duke Street entrance should not be able to leave except by the same way. The absence of alternative escape routes can of itself discourage negative interaction with a site to some extent.
5. The Compton/Prospect Place site boundaries will need to provide a suitable level of defensible space for the lower ground/ground floor apartments located there. Again planting could help in this regard. Even providing an unlocked gate (with an automatic closer) at the Compton site boundary for the path leading to the communal entrance to the Compton stairwell towards the south-west corner of the building would define the space beyond as semi-private and as such should be considered. Signage could assist also.
6. Controllable, directional column-mounted LED lighting aided by building-mounted lighting should be used to aid natural surveillance of the car park, the main pedestrian routes, building entrances etc and deter negative interaction with the site. Bollard lighting is of very limited security benefit and aside from route marking is best avoided.
7. To complement natural surveillance that will exist, the applicant should consider a professionally designed and installed CCTV camera surveillance system for the site to act as a deterrent to offending/unwanted attention, to capture images of any incidents/suspicious activity that might arise and also to provide added peace of mind for the residents (and staff). A clear Operational Requirement would be needed to ensure appropriate coverage of relevant outdoor and indoor spaces. The applicant should consult the 'Surveillance Camera Commissioner Buyers Toolkit', which is an excellent guidance document that should help inform decision making when it comes to considering the installation of a CCTV surveillance system. It could help to avoid common pitfalls and assist in ensuring any such system operated legally and in accordance with best practice. The external lighting will need to maximise opportunities for the capture of good quality CCTV images.
8. It is unknown how the building will operate in terms of access control, staff reception, staffing levels at different times of the day etc. Perhaps the unviewed parts of the DAS explain this. Clearly it will be very important for residents that access is suitably restricted via an appropriate system. The opportunity to create a secure foyer adjacent to the office appears to exist. Presumably some form of auditable visitor door entry system with an audio/video link to each apartment will be incorporated.
9. What seems questionable is the positioning of the vertical circulation arrangements from the main building entrance. To access these all visitors will need to enter the residential corridors rather than them being located within a 'front of house' semi-public communal area housing communal facilities with access to the private residential corridors restricted beyond this. Consideration should be given to some reworking of the proposals to better control the level of

access throughout the building by non-residents – a progressive privacy arrangement should exist with clear distinction between areas where staff, residents and visitors can access. This could aid privacy and security for residents.

10. A crime-resistant site layout will need to be supplemented by appropriate CCTV coverage with a building which deters unwanted attention, and has an appropriate internal layout and access control arrangements in place. Furthermore, to complement this, appropriate physical security should be in place. Staffordshire Police strongly recommend the installation of widely-available, third party certified, manually attack-resistant external doorsets in line with the minimum recommended physical security standards and guidance contained within the Secured by Design Homes 2019 design guide (or any later version). This would apply to such as all communal entrances to the block (and any emergency exits), accessible external apartment doorsets, external plant room, buggy store and lounge doorsets. All individual apartment entrance doorsets will need to offer the same level of physical protection as though they were located directly on a street. To aid safety/security, occupants should be afforded the opportunity to observe who is outside their apartment entrance door, for example, before opening it in response to someone knocking on, with doors fitted with a privacy chain. It is recommended that accessible windows with the same third party security certification are installed.
11. The installation of third party certified products would enhance intruder resistance, provide a safer living environment for the retirement-age residents and be a significant way in which the applicant could seek to design out criminal/anti-social opportunity for the long term benefit of the future residents. It could also reduce maintenance costs too. The much less satisfactory alternative would be to rely upon products which have no such appropriate third party security certification and hence an unknown, unquantifiable and indemonstrable attack-resistance capability to the residents' detriment.
12. Aside from directing the applicant's attention to the Homes 2019 design guide, their attention is also directed to the 2019 publication entitled, 'A Guide for Selecting Flat Entrance Doorsets – A publication for housing associations, landlords, building owners and local authorities in England', which may be relevant. This is jointly produced by the police's Secured by Design, the Fire Industry Association and the Door Hardware Federation and discusses the need for flat entrance doorsets to have relevant dual third party certification for both fire and security.
13. The online Homes 2019 design guide discusses a wide range of matters appertaining to security including access control, CCTV, visitor control, door and window standards etc amongst other things aside from wider site layout considerations. As such, the applicant could find reference to it useful.
14. It is noted that the facility may include catering for those suffering from dementia etc. Should this planning application ultimately meet with approval and the facility becomes operational, it is requested that the applicant/operator contacts the Missing Persons (Adults) Co-ordinator within Staffordshire Police to discuss implementation of the Herbert Protocol, which is an investigative tool to enable residents living with dementia/Alzheimer's to be located more quickly should they ever be reported missing.
15. There is the potential to provide a good quality, safe and secure living environment for residents. The Local Planning Authority should satisfy itself that the above comments and recommendations have been adequately considered and suitably addressed.

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.

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