



**STAFFORDSHIRE
POLICE**

Planning Department
Staffordshire Moorlands District Council
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Staffs
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Early Intervention & Prevention Unit
Ground Floor, Block 9
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Weston Road
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Date: 7th September 2021

Application: SMD/2021/0518
Location: Halfords, Broad Street, Leek
Proposal: Change of use to Class B8 (storage or distribution)

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."

The submission of the change of use to Class B8 Storage or Distribution is noted. Staffordshire Police have no objection to the broad proposals, but have the following observations and comments to make that could benefit the applicant for the long term. It is requested that these are passed on to the applicant for their consideration.

1. The nature of the applicant's business suggests that the premises will contain a large amount of high value stock, which could be of interest to organised and determined offenders. Consequently, a well-conceived security strategy will need to be in place with an appropriate level of security to counter this. While the premises is located on a busy road and there some houses directly opposite the front, during quiet times there would be substantially reduced natural surveillance and the ability to approach the building line on most sides as well as potential to gain access to the roof at the rear. If the rewards warranted it, organised offenders may not be put off from a quick brute force attack by the town centre location.

2. Bollards already exist at the front of the premises, although the Proposed Ground Floor Plan drawing shows 4 anti-ram bollards (presumably new) protecting the customer entrance. If new bollards are to be installed, those with relevant PAS 68 or IWA 14 certification should be considered, which can demonstrate resistance to attack. The air gap between bollards is shown as 1400mm. Albeit aimed at a different type of threat, the CPNI's 'Integrated Security – A Public Realm Design Guide for Hostile Vehicle Mitigation' document recommends a maximum air gap of 1200mm. Consideration may wish to be given to making the necessary amendments in the light of this.
3. New double delivery doors are to be installed in a side elevation with a new roller shutter door internally. A new roller shutter door is also proposed internally for the customer entrance and a metal security door inside the fire exit towards the rear of the unit. The applicant should be aware that there can be a vast difference between the level of attack-resistance such products provide, which is not immediately apparent from observation alone. The installation of products (doorsets, roller shutters) that have third party certification from a UKAS accredited test house to a recognised manual attack-resistant commercial security standard and at an appropriate security/burglary rating is recommended. The most appropriate security/burglary rating would need to be ascertained through dialogue with the product manufacturers/suppliers based on perceived risk. These standards classify the resistance to forced entry provided by security products, systems and building materials via a security/burglary rating, tested against the tools and time likely to be used by a criminal. Installing such certified products ensures a tested and proven level of attack resistance whereas products which have no third party security certification have an unknown and unquantifiable attack-resistance capability.
4. Albeit a generic document, the applicant can find guidance on recognised minimum manual attack-resistant security standards (and a whole raft of other information appertaining to crime prevention, both in terms of layout and building security) in the Secured by Design Commercial Developments 2015 design guide available online. The standards contained therein are minimum recommended standards and consequently, consideration may need to be given to exceeding these based on the perceived risk. It is also worth noting that later versions of some of the security standards contained within the design guide have been published and it is products certified to these that should be considered.
5. It is noted that no bollards are indicated to protect the new side double doors. Consideration may wish to be given to providing the same to mitigate one particular risk.
6. Currently, the bulk of the frontage is protected by bollards, large glazed windows with roller shutters behind. It is worth commenting that the wooden window frames are not in a good condition. The Proposed Ground Floor Plan drawing indicates a security partition internally, although what this comprises is unclear. The installation of a security partition possessing relevant third party security certification would be desirable. Clearly, the applicant will need to ensure that the multi-layered protection of the frontage provides a robust and sufficient level of attack-resistance.
7. The area to the rear of the unit is hidden away and elevated, and despite the presence of anti-climb rotating vanes, one might imagine that these would not present much obstacle to organised offenders seeking to gain access to the roof. It would be prudent for the applicant to give consideration to this and assess any potential impact this might have upon unit security.
8. Finally, the applicant's attention is drawn to a technological security measure that could substantially enhance the security of the premises out of hours. Fogging devices, when activated can fill the building with a dense impenetrable harmless fog in a matter of seconds, the principle being - what you can't see, you can't steal. If a system is well designed, almost invariably the dense fog forces offenders to flee empty-handed, lest they become trapped within. Critically, fogging devices are designed to protect premises for the time between an alarm activation (it is presumed the unit will have a remotely monitored intruder alarm) and the arrival of anyone responding to an activation. There are a number of Secured by Design member companies with police preferred specification fogging device products and as such attention is directed to them – www.securedbydesign.com. On each website of the respective member companies are a selection of videos with a series of real burglaries/robberies in an assortment of settings where

their products have activated to thwart offenders. They are collectively quite impressive. The companies provide tailored solutions and can provide on-site demonstrations too. Given that organised offenders will reconnoitre a potential target beforehand, the advertised presence of such a device/s can itself be a powerful deterrent.

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