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Early Intervention & Prevention Unit
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Date: 12th November 2021

Application: SMD/2021/0694
Location: Land at Ash Bank Road, Werrington
Proposal: 75 dwellings, new access, provision of green infrastructure and all associated works

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 92(b) of the NPPF 2021 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 130(f) of the NPPF 2021 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. Having appraised the proposals from the perspective of their potential to generate criminal or anti-social behaviour Staffordshire Police have only a few adverse comments to make. It is evident from comments in the Design and Access Statement (notably Section 4.2.10 Residential Amenity) that in the main, due consideration has been given to designing out crime and designing in community safety as reflected in the proposed site layout. Questions exist though in relation to rear access paths and some potential opportunities for improved natural surveillance.
 2. Concerning the main parcel of development, the following positive design elements are noted:
 - A single vehicle access point and separate pedestrian linkage – both adequately overlooked;
 - Retention of the Ash Bank Road site boundary wall helping to enclose/define the site;
 - Well-defined public and private space throughout the development;

- Properties addressing the street providing active frontages with private rear gardens generally backing onto one another or existing rear gardens – mutual security;
 - Good levels of natural surveillance throughout between dwellings and over public space aided by dual-aspect corner plots;
 - Reasonable boundary treatments with the opportunity to prevent unauthorised access from the front of dwellings to private rear gardens;
 - Defensible space at the front of dwellings;
 - A road network which should curb vehicle speeds to aid safety;
 - A planting buffer between the site and set back from the neighbouring HMYOI. (Presumably a suitable assessment has been made to determine the likelihood/extent to which noise from the HMYOI might impact upon residents of the new development. The fact that the prevailing SW wind should carry some noise from the HMYOI away in the opposite direction is likely to be beneficial in this regard);
 - Aside from the formal connections to Ash Bank Road, the absence of other through routes should reduce the opportunity for outsiders to enter the site. This should contribute to a development that is perceived to be under the ownership and control of its residents, which itself can have a positive impact upon deterring crime and anti-social behaviour.
3. A number of rear access paths are incorporated within the development. Alas these are not gated at their respective entrances, but much further back. Secured by Design best practice advice is that to reduce opportunities for offenders to more easily gain access to the rear (plus anti-social behaviour), gating should be as close to the front of the building line as possible with a key operated lock, operable from both sides provided. It is recommended that the necessary alterations are made to address this.
 4. Unfortunately it is not a simple process to determine the extent of natural surveillance at the side of dwellings overlooking the parking provision. Secured by Design Homes 2019 guidance recommends "Where parking is designed to be adjacent to or between units [as will be the case here], a gable end window should be considered to allow residents an unrestricted view over their vehicles". Some perhaps even most of the parking will be overlooked by such windows, but it is unclear whether this will be the case throughout the development. Where there are any deficiencies in this regard, it is recommended that the necessary alterations are made to reduce the number of blank gables/those with bathroom windows only to ensure that all side parking is at least potentially viewable from one adjacent dwelling. Eliminating blank gables can also be generally beneficial to the overall aesthetics of a development.
 5. External defensive hedge planting can be a very effective way in which rear garden boundaries which abut publically accessible space can be made more secure. The applicant should ensure that all such opportunities that exist here should be undertaken. There can be ecological and aesthetic benefits with this approach too.
 6. With regard to the smaller parcel of development, the reasoning behind the need for the parking to be detached and separate from the housing is understood, although this will expose vehicles parked there to potentially a more elevated degree of risk. Furthermore, it will prove much more inconvenient for residents, for example, a young mother dealing with a toddler/baby and with shopping to unload.
 7. The DAS states that 'The design creates clear definition between the public and private realm and follows the principles of Secured by Design using primary and secondary streets and private drives.' From the viewpoint of Staffordshire Police and undoubtedly for the long-term benefit of all future residents of the development, should permission be granted, it would be highly desirable for the dwellings to ultimately satisfy the minimum physical security requirements contained within the Secured by Design Homes 2019 design guide (or any later published version). Of particular importance would be the installation of external doorsets and ground floor/accessible windows, 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 consequently introduce an easily avoided and unnecessary vulnerability.

8. 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 following lines would be ideal.

'For online advice on construction site security, the applicant's attention is directed to the following publications from recognised bodies:

- Construction Site Security – A Guide (British Security Industry Association)
- Construction Site Security Guide 2021 (Secured by Design)'

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