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Date: 23rd November 2021

Application: SMD/2021/0695
Location: Land adjacent Cellarhead Substation, Rownall Road, Wetley Rocks
Proposal: Erection of a Flexible Energy Facility

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 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."

The submission of the above planning application for the erection of a 349MW capacity flexible battery storage facility is noted.

Staffordshire Police have no issues with the principle of this type of development at this location. With regard to matters of security and in the light of the importance placed upon designing out criminal opportunity, the following observations, comments and recommendations are made with a view to deterring, detecting and delaying potential offenders.

1. The site would be set back 200m from Rownall Road. The location would be quiet, easily accessible on foot (and possibly by vehicle) and subject to minimal natural surveillance, particularly at certain times of the day. This would be enhanced by the existing and proposed screen planting. These collective circumstances imbue the location with a certain inherent

vulnerability that determined offenders could seek to exploit should there be sufficient motivation for them to target the site.

2. The 4m high wooden acoustic fence and 4.5m high matching gates indicated to enclose the facility compound should provide a reasonable first line of defence and deterrent aside from serving the primary purposes of visual screening and reducing noise pollution. The two sliding latch locking points including one at 2.5m height are noted. It is recommended that suitably high security and threat commensurate CEN-rated padlocks are used to secure these locking points.
3. Given the quiet, semi-isolated nature of the location, unless potential offenders with hostile intentions are deterred by the nature of the fencing/gating in the first instance, without the means provided to detect and monitor suspicious activity, and generate a response, those involved would be able to act with relative impunity to overcome the physical barrier. Aside from the acoustic fencing/gating, the application documentation does not discuss security matters in any detail (which admittedly may be a conscious and prudent choice). Certainly no CCTV coverage is suggested presently.
4. Remotely monitored CCTV cameras linked to detection activation technology can be a very effective way of protecting vulnerable or isolated sites potentially subject to targeting. Such systems enable: live images to be viewed; suspicious activity to be detected; ongoing assessments to be made; audible challenges/warnings via tannoy provided (where this facility is incorporated); and timely real-time interventions initiated as necessary. The comprehensive protection of the site and compound boundary with such a bespoke professionally designed and installed system with monitoring/response capability based on a clear Operational Requirement is recommended. The ability to detect suspicious activity at the earliest opportunity would be highly desirable to allow an accurate assessment of potential threats, deny potential offenders the time to operate and the ability to summon a suitable response promptly. Any remotely monitored detector activated CCTV systems should be installed in accordance with BS8418:2015 - *Installation and remote monitoring of detector operated CCTV systems – Code of Practice*.
5. Given the rural setting, there will be obvious sensitivities around permanent lighting. While permanently lighting the site would not be at all appropriate or necessary, motion detector-activated security lighting may be appropriate, which would assist with detection, observation and monitoring of potential offenders or those involved in suspicious activity. Lighting columns could in themselves contribute towards a deterrent. Of course, infra-red lighting may be considered more appropriate. Any lighting scheme would need to be designed to ensure that any CCTV cameras were able to operate to maximum efficiency and obtain optimum quality live viewing/recorded images. Blind spots and dark recesses would need to be avoided.
6. The Planning Statement makes the case that 'Without a [battery] storage facility at Cellarhead, the region will be at increasing risk of localised grid failure which could not be effectively mitigated by storage facilities in other parts of the country due to the effect of power losses when electricity is transmitted over long distances.' This suggests that a proportionate level of security will need to be provided to ensure that what could be a critical national infrastructure site is adequately protected at all times. Indeed NPPG Design Paragraph 11 states that 'Taking proportionate security measures should be a central consideration to the planning and delivery of new developments and substantive retrofits.' While the compound fencing/gating may well deter opportunistic offenders, it alone would be unlikely to deter organised, resourceful and more determined offenders with potentially differing motivations who may seek to target the location.

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