



**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
Stafford
ST18 0YY

Date: 23rd December 2021

Application: SMD/2021/0804
Location: Land at The Fields Farm, Draycott Cross, Cheadle
Proposal: Battery energy storage scheme

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."

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1. The submission of the above planning application is noted. The narrative accompanying this application indicates the site will be enclosed with 2.4m high paladin fencing, possibly supplemented by a timber acoustic fence internally (if one is required) with CCTV cameras positioned along the fence line. Whether the paladin fence (which may just be used here as a generic term for a basic weld mesh fence) will possess any attack-resistant security accreditation is unknown. Alas basic weld mesh types can be very easily breached by knowledgeable and/or determined offenders. In remote locations (such as this), even attack-resistant fencing can be ultimately overcome, although there will be an increased time delay with such fencing.
 2. CCTV cameras are to be positioned along the fence line, although their functionality is not disclosed. A key consideration for remote locations is to deny potential offenders the ability to act with impunity. Unless their presence is detected initially, they could have fairly limitless time to operate. The danger with record-only CCTV provision is that all it will do is record (possibly good)

images of offenders wearing dark clothing who have taken steps to hide their identity going about their business. If that is the case it will not protect the site. On the other hand, a well-planned monitored CCTV system can be an extremely effective way of protecting vulnerable or remote sites, which could be subject to intrusion and theft. Unlike record-only CCTV systems, remote monitoring can enable suspicious activity or intrusion to be detected, live images to be viewed and pertinent evidence captured (particularly where PTZ cameras exist), on-going assessments and audible challenges made (where tannoy systems are included), and real-time interventions initiated, as necessary. Given the rural location, presumably any CCTV cameras would need to have infra-red capability. Given the obvious limitations of record-only CCTV, Staffordshire Police recommend that suitable monitored CCTV surveillance camera provision is made. Any remotely monitored detector activated CCTV system should be installed in accordance with BS8418:2015 - *Installation and remote monitoring of detector operated CCTV systems – Code of Practice*.

3. Ultimately it would be prudent for any security measures to be in place and operational before the cabling, energy storage etc are installed to protect against incidents including theft of construction materials before any facility goes live.
4. 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