



**STAFFORDSHIRE
POLICE**

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Early Intervention & Prevention Unit
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Date: 6th January 2022

Application: SMD/2021/0113
Location: Land at Bridge End, Macclesfield Road, Leek
Proposal: Erection of 12 bungalows
CONSULTATION ON REVISED INFORMATION

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. The previous consultation response from Staffordshire Police in relation to earlier layout proposals drew attention to perceived weaknesses, notably dwellings that did not adequately address the access road and the lack of overlooking of it from habitable rooms. While there is still room for improvement, the revised site layout appears much improved. Dwellings will undoubtedly better address the road and include active frontages, and better relate to one another providing scope for a closer-knit community. Alas plots 7 and 8 will have no habitable rooms at the front, which would be preferable in terms of improving natural surveillance over the road. Rear parking is provided between plots 10 and 11 although the gables of these dwellings that could provide some overlooking of this space or the approach to it are blank. It would be beneficial in terms of security for side windows to be added.

2. Hedging has been included to protect certain more vulnerable rear garden boundaries, which is welcomed. Whilst acknowledging the rural setting, according to the Revised Boundary Treatments and Landscaping Plan, certain other rear gardens boundaries do not appear sufficiently intruder-resistant. The rear garden boundary of plot 5 bordering the footpath/access track to the nature reserve will only comprise 1.5m high post and rail fence. This could render this dwelling unnecessarily vulnerable. At the very least, defensive hedging should be planted and maintained along this boundary to enhance protection. Similarly the section of plots 4's rear garden boundary that will border this footpath/access track will only comprise a 1.2m high stone wall, which will provide minimal obstacle to unauthorised intrusion. Raising the height of this wall and reinforcing it either internally or externally with protective hedging could reduce vulnerability to some degree without unduly impacting upon the general aesthetics.
3. In terms of providing a secure environment, it should not be possible for unauthorised access to be easily gained from the front of dwellings to the private rear gardens (where the majority of burglaries take place). 1.8m high fencing and lockable gating (ideally located as close to the front of the building line as possible) are conventionally used to deny this. Unfortunately, the Revised Boundary Treatments and Landscaping Plan suggests that there could be some distinct shortcomings in this regard. The annotated plan is in fact rather unclear on the nature and height of certain of these boundaries. It is recommended that suitable amendments are made (where required) to ensure that unauthorised access from the front to the rear gardens is adequately denied.
4. Whether post and rail fencing will be a suitable means of subdividing the rear gardens will need to be assessed. Certainly in terms of security, privacy and nuisance (for example, dog roaming) this seems doubtful.
5. It is acknowledged that the ability for residents to have direct and level access to the open space/nature reserve (and views) to the east will be very beneficial. Of course, the footpath link has the potential to undermine the defensible space of the development by admitting outsiders. Assuming it is accurate, it is very pleasing to note that a locked gate is shown at either end of this footpath on the revised Boundary Treatments and Landscaping Plan. Gates of suitable height and non-climb design, which are access controlled (operable by residents only) reinforced by appropriate signage could provide an appropriate level of control and substantially reduce any perceived vulnerability.
6. In terms of the dwellings themselves, the applicant is advised that from the viewpoint of Staffordshire Police and undoubtedly for the long-term benefit of the future residents, it would be highly desirable for the dwellings to meet the minimum physical security requirements contained within the Secured by Design Homes 2019 design guide (or any later published version). Specifically this would be external doorsets and ground floor/accessible windows (and ideally garage doorsets), 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 and provide a proven and demonstrable level of manual attack-resistance, whereas non-certified products offer no such assurance, and introduce an easily avoided and unnecessary vulnerability. As well as providing comprehensive information about aspects of physical security including security standards, the Homes 2019 design guide contains a raft of other information including security-related layout considerations, which could benefit the applicant. For the above reasons, their attention is directed to it.
7. The revised site layout is generally an improvement upon the previously submitted version, although certainly aspects of the boundary treatments in particular warrant clarification and uprating in terms of intruder-resistance where perceived deficiencies exist. There may also be some opportunity to improve overlooking of the public space from certain dwellings.
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