



STAFFORDSHIRE
POLICE

Planning Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffs
ST13 6HQ

Early Intervention & Prevention Unit
Ground Floor, Block 9
Staffordshire Police HQ
Weston Road
Stafford
ST18 0YY

Date: 16th February 2022

Application: SMD/2022/0031
Location: Anzio Camp, Buxton Road, Blackshaw Moor
Proposal: Variation of Conditions 2, 18 & 19 and Removal of Conditions 20, 21, 22 & 24 of SMD/2014/0683

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."

-
1. The Planning Statement (19.01.22) identifies that significant changes are proposed in real terms to the extant approved planning use of Anzio Camp. The live/work units, extra care cottages and two care homes will be removed from the plans and the number of holiday accommodation units will be increased from a maximum of 45 to potentially 210. The site will become a holiday park in its entirety with the social hub building (formerly the Military Mess) previously proposed, retained in its central site position. As the lodges are deemed temporary moveable structures rather than buildings under planning, the layout of them has not been provided, although the holiday cottages will be located in the south-west portion of the site in place of the previously approved live/work units. The apparent substantial reduction in the economic viability of the proposed care home/facilities provision coupled with the substantial upturn in the domestic holiday accommodation market resulting from Covid foreign travel restrictions have apparently been the drivers in the revised proposals.

2. How the holiday accommodation site will be managed to provide an environment that is friendly, safe and yet takes security into consideration is unfortunately not disclosed. The business operating model and likely/target occupancy rates of the accommodation are not stated. A site with a high occupancy rate all year round could contribute to informal social policing of the site, but times of low occupancy rates could have the opposite effect. When the holiday accommodation is fully occupied and there is plenty of activity, the opportunity for it to be a source of attraction to potential offenders would be reduced. However, at quieter times when occupancy levels are much lower, the holiday accommodation could potentially attract some unwanted attention, such as break-ins or nuisance behaviour. The security of site maintenance equipment etc will also need to be adequately considered as this can be a particular target in a rural setting. The social hub building, which the plans suggest will house site staff/management will be located well away from the site entrance and seemingly with no natural opportunity for staff/management to observe site comings and goings. This perceived site vulnerability needs to be considered and appropriate measures put in place to counter it as far as possible.
3. Potentially, there would be one way in and out of the site (the site entrance), which would be ideal, reducing potential offender access/egress routes and increasing risk to them. The nature of the Buxton Road site boundary (aside from the site entrance) should seek to deter pedestrian movement, channelling everyone via the main entrance. Enhancing the boundary planting (as proposed) is welcomed. Were an appropriate fence to exist along this boundary to restrict access, with the planting being supplementary in terms of a security buffer (aside from the planting's screening/aesthetic benefits) it would be preferable to relying upon the planting alone.
4. Security provision will need to be sufficient to deter unwanted attention and provide a site that is perceived to be safe and secure by holidaymakers. Adequate security provision should be seen as a potential plus for holiday visitors. Appropriate CCTV surveillance camera coverage could form part of the provision. One well-defined site access with all vehicle and pedestrian movements channelled through it would potentially lend itself to very useful high definition CCTV images being captured and staff management supervision/oversight of movements. This could discourage unwanted attention to be directed to the site and should capture evidence that might further an investigation should any incidents arise. Ultimately a CCTV Operational Requirement should be used by the applicant to help identify the purpose of any future site CCTV provision. Anything which can further generate a strong sense of identity at the entrance (gateway feature/s, signage etc) should reinforce the impression to outsiders that they are entering an area under the management and control of the site operator.
5. The merit in being able to restrict/manage vehicle movements into the site, perhaps between certain times (overnight) should be explored by the applicant.
6. Ideally sight lines within the development site should be maximised where possible, for example by ensuring the crowns of the large number of trees on site (that do not form part of the perimeter) are raised sufficiently, and shrubbery is kept low, and maintained as such.
7. The holiday lodges and cottages will need to possess an adequate level of physical security – external doors, windows and glazing. Minimum recommended physical security standards are available online in the Secured by Design Homes 2019 design guide (or any later subsequent version). Consideration may wish to be given to the use of some form of intruder alarm (linked to the offices/security) to protect unlet holiday accommodation.
8. In the light of the importance placed upon designing out crime and designing in community safety as bullet-pointed at the top of this consultation response, the Local Planning Authority should satisfy itself that suitable security arrangements/operating procedures will be incorporated into what are effectively significant revisions to the existing proposals for the site.

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/Designing Out Crime Officer