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Early Intervention & Prevention Unit
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Date: 3rd March 2022

Application: SMD/2022/0088
Location: FIE, Bones Lane, Cheddleton
Proposal: Food processing facility/edible bone factory

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 reviewed the proposals, there would not appear to be any obvious risk of incidents of crime, disorder or anti-social behaviour arising from the construction of the facility. The existing lodge and weighbridge facility with security personnel will manage access to the development site and provide a permanent security presence, able to identify any potential issues at an early stage. The provision of a sizeable office at the northern end of the development site should assist in providing useful additional overlooking opportunities both towards the lodge/weighbridge area, the new car park and one end of the new building.
 2. Whether CCTV surveillance camera provision exists currently is not known, but extending any existing provision could help security staff to more effectively oversee the site. The straight external building lines of the new build would aid good camera coverage. Were CCTV coverage to be extended/provided, a CCTV Operational Requirement would be required from the outset to

identify the system's remit and to help inform system requirements with a view to ensuring the professionally designed and installed system served its intended purpose.

3. The applicant's attention is directed to the online 'Surveillance Camera Commissioner Buyers Toolkit', an excellent guidance document that could help inform decision making when it comes to considering the installation of a CCTV surveillance system. It is a comprehensive easy-to-follow guide for non-experts thinking about buying a CCTV surveillance system and want to ensure they avoid common mistakes and buy an effective system that does what they want it to do. It discusses the importance of having an Operational Requirement from the outset and it is full of advice and tips on how to get the best out of any prospective supplier. It also covers relevant standards and certification, and current legislation.
4. The application documentation references security fencing and 1.8m Palladin (weld mesh) fencing. The applicant will need to consider whether the proposed fencing will provide the desired level of security in the light of any other existing/proposed security arrangements and any perceived risk. It is worth commenting that basic weld mesh fencing with no security certification can be easily cropped to effect entry. The following generic advice is provided to assist the applicant.
5. Fencing/gating systems come in varying qualities, styles and proven levels of attack-resistance (or none at all). Opting for the most suitable fencing type and choosing a product which also has third party certification from a UKAS accredited test house to a recognised commercial attack-resistant security standard (such as the latest versions of LPS1175 or STS202) and at an appropriate security/burglary rating would be worthy of consideration to form a first line of defence. Such fences (and corresponding gating where required) independently demonstrate that they are able to withstand a penetration attack for a set amount of time using a particular set of typical attack tools. Non-certified products are not able to demonstrate this and as such may contain inherent weaknesses, which may not be immediately apparent. The most appropriate fencing type and security/burglary rating etc would need to be ascertained through dialogue with the product manufacturers. The applicant is directed to fencing manufacturers who are Secured by Design member companies and provide a range of police preferred specification products (security certified fences). They are well placed to provide valuable advice. Fencing/gating would also need to deter climbing – not something the above standards test against. Alas gating often contains design vulnerabilities (for example, external climbing aids often in connection with the locking area, and smooth gate tops). This would also need to be considered in discussions (if relevant). Fencing/gating should also be manufactured and installed in accordance with the relevant part of BS 1722.
6. Some new perimeter hedging is suggested. Defensive hedging can provide a very useful supplementary barrier and protective buffer for fencing aside from the screening and ecological benefits to be derived from it. It may be worth the applicant considering whether there would be further scope to utilise this natural means to enhance perimeter security over and above what is currently proposed. If done well, such a course of action could potentially offset any perceived need to enhance the attack-resistance of the fencing.

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