



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: 30th March 2022

Application: SMD/2022/0051

Location: 113 Mill Street, Leek – vacant land adjacent to Wesleyan Court

Proposal: Construction of a drive-through restaurant

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. An internal conversation with the Neighbourhood Policing Team commander has taken place in relation to this application and no concerns were expressed about any potential undue impact upon crime, disorder or anti-social behaviour arising from such a premises at this particular location. The site would certainly be a compact one, given the typical size of such premises elsewhere, and the premises subject to good natural surveillance from those passing by (as well as from the adjacent Wesleyan Court). Although the road can be very busy at certain times of the day, the 30mph speed limit coupled with the presence of speed monitoring cameras and good visibility on Mill Street each way are viewed positively.
 2. Generally most of the residential properties within the locality are at sufficient distance so that it is unlikely they would be adversely impacted by such a premises. However, the same might not be said for Wesleyan Court and particularly the units within the elevation overlooking the application site. The potential for the residential amenity of those residents to suffer from nuisance from noise (drive-through ordering will be done on that side of the site) and

queuing/manoeuvring traffic will clearly need to be considered and suitably addressed. Operating hours will also need to reflect the proximity to residential dwellings and be appropriately conditioned. Ideally, vehicle access to the site should be restricted out of hours by some means to reduce the opportunity for misuse of the site.

3. As part of a well-considered security strategy, the applicant should give consideration to installing a professionally designed and installed CCTV surveillance camera system covering relevant internal and external areas to deter negative interaction and encourage appropriate behaviour, offer reassurance to staff and capture excellent quality images to further an investigation should the need arise. This should supplement good physical security. The drafting of a CCTV Operational Requirement by the applicant from the outset would be essential to establish any CCTV surveillance camera system's remit and to help inform system requirements with a view to ensuring the professionally designed and installed system ultimately served its intended purpose.
4. Staffordshire Police would draw the applicant's attention to an excellent guidance document that could help inform any decision making around the installation of a CCTV system. The 'Surveillance Camera Commissioner Buyers Toolkit' is a comprehensive easy-to-follow '5 steps to achieve success' guide for non-experts thinking about buying a CCTV system and want to ensure they avoid common mistakes and buy an effective system that does what they want it to do. It is full of advice and tips on how to get the best out of any prospective supplier. It also covers relevant standards and current legislation. Standard police advice would be to opt for a professional CCTV company which has either relevant National Security Inspectorate (NSI) or Security Systems and Alarms Inspection Board (SSAIB) accreditation for CCTV systems.
5. In addition, for CCTV recordings to be effective in detecting and investigating crime they must be fit for purpose and easily accessible by police investigators. Given that any images may be used by the police or in an investigation, any CCTV system installed would need to ensure that any CCTV surveillance system satisfies the ACPO/Home Office produced 'Police Requirements for Digital CCTV Systems' guidance available online, which albeit rather old contains some important guiding principles.
6. It may be that the applicant will be using a standard building model template, which has been tried and tested for its functionality and appearance, no doubt having been improved upon over time. It is to be hoped that this includes an appropriate level of security provision, particularly for the exterior of the building. Albeit a generic document, the applicant can find guidance on recognised manual attack-resistant security standards (and a whole raft of other information appertaining to crime prevention, both in terms of layout and building security) in the Secured by Design Commercial Developments 2015 design guide available online (or any later published version). The standards contained therein are minimum recommended standards and consequently, consideration may need to be given to exceeding these, if the perceived risk demands it. It is also worth noting that later versions of some of the security standards contained within the design guide have been published and it is products certified to these that should be considered. Where they exist, installing products with third party certification to the latest version of relevant standards is always advisable as they factor in latest test methods, respond to changes in offender attack methods and are tested against the most updated list of tools.
7. 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/Designing Out Crime Officer