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

Date: 10th May 2022

Application: SMD/2021/0550
Location: Fole Dairy, Uttoxeter Road, Fole
Proposal: Approval of reserved matters, appearance, landscaping, layout and scale relating to residential development SMD/2018/0234

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 layout (Proposed Site Plan drawings 150K and 151C) appears to demonstrate that appropriate consideration has been given in the main to seeking to design out criminal and anti-social opportunity. Outward facing dwellings will address the streets and most linkages provided to facilitate a good degree of natural surveillance from habitable rooms over the public spaces including parking and the LEAP. Dual aspect corner plots in specific locations and natural surveillance from one dwelling towards another will help in this regard. Owing to unknown technical reasons it has not been possible to view all house type plans/elevations online to check whether useful side windows have been included to provide some overlooking of vehicles parked at the sides of all respective dwellings. Such provision is recommended. Some rear gardens will back onto the river, which is ideal in terms of security and a reasonable proportion of the private rear gardens will back onto one another to provide mutual security. Where this does not happen some will back onto retained and enhanced hedgerows or the principle of defensive buffer

planting should be well utilised, including the excellent instant pyracantha hedging for some potentially more exposed boundaries. Landscaping has also been well used to help provide some defensible space at the front of properties where required. Road layout and configuration will ensure that vehicle speeds will be kept low to aid pedestrian safety.

2. One aim should be to prevent unauthorised access from the front of properties to the private rear gardens, and well-positioned, minimum 1.8m high robust fencing and lockable gating is required to do this. Unfortunately, there does not appear to be a boundary treatments drawing to confirm whether this will be the case. This minimum height fencing should also be used to enclose rear gardens aside from any supplementary planting. The Local Authority should satisfy itself that robust boundary treatments have been provided.
3. It is worth noting that the parking areas to the rear of plots 31-32 and for plot 40 may have limited natural surveillance over them. Any improvements in this regard should be considered.
4. Column street lighting compliant with BS5489-1:2020 Code of Practice for the Design of Road Lighting supplemented by dwelling mounted lighting at the front of dwellings can play an important role in providing a safe living environment and reducing opportunities for crime and anti-social behaviour. A well-designed lighting scheme would address this and need not conflict with ecological considerations as long as it is undertaken by a qualified lighting designer who can demonstrate suitable professional competency for this type of development coupled with relevant years of experience.
5. The clearly bounded, semi-isolated, well-designed development subject to good natural surveillance throughout should allow a strong sense of community identity to quickly develop, which itself can be good crime prevention. The development should be perceived to be under the ownership and control of its residents, which should to some extent deter unwanted attention being attracted to it. The absence of a route for vehicles through the development should reduce the ease with which potential offenders could casually scope the development for targets. The fact that the site is located in a rural location and comparatively low crime area are also noteworthy. As an aside, some excellent CAD drawings amongst the documentation provide a very good indication of how the scheme might look.
6. The applicant is advised that from the viewpoint of Staffordshire Police and undoubtedly for the long-term benefit of the future residents, it is recommended that the dwellings satisfy the minimum physical security requirements contained within the Secured by Design Homes 2019 design guide (or any later published version). Of particular importance would be the installation of external doorsets, ground floor/accessible windows and garage doorsets, which have been tested and more 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 products are widely available, satisfy rigorous performance standards aside from security ones, and provide a proven and demonstrable level of manual attack-resistance, whereas non-certified products offer no such assurance, and consequently could introduce an easily avoided and unnecessary vulnerability.
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 Elington
Crime Prevention Design Advisor/Designing Out Crime Officer