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Date: 9th June 2023

THIS RESPONSE SUPERSEDES THAT PREVIOUSLY PROVIDED (14//7/22).

Application: SMD/2022/0199
Location: Land adjacent to Daisy Bank Farm, Uttoxeter Road, Upper Tean
Proposal: Reserved matters application and associated discharge of conditions 3, 11 and 13 pursuant to outline planning permission ref. SMD/2018/0509 for the residential development of 55 dwellings including the creation of a new access, car parking and ancillary landscaping
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."
1. The site benefits from being in a comparatively low crime area, which should be inherently advantageous to the future residents. Nevertheless, it is prudent to ensure that the layout is designed in such a way as to deter criminal and anti-social activity and thereby provide a secure and safe living environment for the future residents. The planting buffers on the site perimeter should be enhanced where possible. As well as providing screening, this could contribute to reinforcing certain rear garden boundaries that will back onto these areas in places.

2. The single access road is noted and this should be subject to a high level of natural surveillance from active frontages within dwellings which will address the street, deterring the site from attracting unwanted attention. Pedestrian (footpath) connectivity is provided into the site from Uttoxeter Road where the public open space is located. Gating this pathway at the site boundary is recommended to at least convey the impression of a more private location within to deter casual intrusion. Overlooking of the public space between the houses and Uttoxeter Road should be good.
3. Car parking will generally be in-curtilage with much of it at the front (where it can be well overlooked) or to the side of properties. Secured by Design Homes 2023 guidance recommends "Where parking is designed to be adjacent to or between units [as will be the case here], a gable end window should be considered to allow residents an unrestricted view over their vehicles". The applicant should endeavour to meet this recommendation wherever possible.
4. The inclusion of the mutually secure arrangement whereby rear gardens will back onto other rear gardens or existing development is welcomed where it has been applied, although this is not universally the case. Defensive planting/hedging within a development can be a very effective means of protecting rear garden boundaries which are more exposed/about public space at the side or the rear (for example, side of plots 12 and 22, rear of plots 23-34, side of plots 38 and 42). Furthermore, such planting can soften the appearance of fencing/walls and add interest as well as having a range of ecological benefits. The applicant should seek to ensure that opportunities to utilise this subtle yet very effective crime prevention technique have been fully explored and implemented where possible.
5. Standard 1.8 high fencing/walling is indicated for rear garden boundaries which seems appropriate for the setting. It will be important in terms of security, child safety and privacy that unauthorised access from the front of the dwellings to the private rear gardens is restricted by the positioning of 1.8m high fencing and lockable gating as close to the front of the building line as possible (while accepting that side parking pushes the secure line more towards the rear of the property). A separate boundary treatment drawing would have been useful to more easily determine whether the rear of each property will be properly enclosed.
6. It is encouraging to note that a Proposed Lighting Strategy - Design Document has been produced, which suggests a high level of attention and detail has and will be directed to this issue. The proposed use of LED column down-lighting with a reasonable colour rendering index is viewed positively. Column street lighting compliant with BS5489-1:2020 Code of Practice for the Design of Road Lighting (amongst other standard requirements) should be supplemented by dwelling-mounted lighting at the front of dwellings (and/or side where appropriate). In combination, these can play an important role in providing a safe living environment and reducing opportunities for crime and anti-social behaviour, and need not conflict with ecological considerations.
7. In addition to providing a sound layout, and undoubtedly for the long-term benefit of the future residents, Staffordshire Police recommend that the dwellings within this development satisfy the recommended minimum physical security requirements contained within the online Secured by Design Homes 2023 design guide. The police's Homes 2023 document seeks to provide best practice guidance to the construction/developer industry in relation to the security of new and refurbished developments both in terms of layout and physical security. Of particular importance in relation to physical security would be the installation of external doorsets and ground floor/accessible windows, which have been tested and importantly, possess independent third-party certification from a UKAS-accredited certification 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 and provide a safer living environment in line with NPPG guidance bullet-pointed at the top of this response. Such third-party certified doorsets and windows are widely available, satisfy rigorous material 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. Given that security and a feeling of safety are important considerations for house buyers, it makes sense (commercially as well) for this to be addressed. The applicant is directed to the online guide for further information on security standards, in

addition to the raft of other useful information contained therein regarding layout and physical security considerations. The applicant should appraise their proposals with the guidance in order to ensure that pertinent aspects can be incorporated as appropriate.

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)
- Construction Site Security Guide (National Business Crime Centre)'

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
Designing Out Crime Officer