STAFFORDSHIRE POLICE

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

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

Date: 27th September 2023

**Application:** **SMD/2023/0294**
**Location:** **7, Ball Haye Street, Leek,**
**Proposal:** **Shop Front Alteration - To remove existing timber shop front, door and glazing and replace with new aluminium glazed frame to sit flush with façade and have integrated shutters concealed behind the signage panel.**

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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Staffordshire Police note the submission of the above planning application.

It is noted that as part of the proposals a concealed motorised roller shutter would be included. External roller shutters can certainly provide a high level of protection against burglary and criminal damage (window smashing), especially when they possess independent third-party certification to a recognised manual attack-resistant standard (for example LPS1175 or STS202) which offers tested and (varying) proven levels of attack resistance, something non-certified products cannot provide. However, installing shutters can be unsightly, coming at an aesthetic cost to an area and sending out a message that the locality is perhaps a high crime one, necessitating the need for such robust physical security measures, and in some circumstances contributing to a fear of crime, whether it is justified or not. They can also be vulnerable to graffitiing. The submission documentation contends

that "the proposal is sensitive to the Conservation area" and "the proposals … will have no impact upon its surroundings". Given that the premises is on a very prominent pedestrian and vehicular route through the town with slow-moving traffic and is directly opposite a zebra crossing, no doubt any likely adverse visual impact upon the location and townscape in general will form part of the decision-making deliberations.

While shutters which are more visually-permeable can reduce the potentially negative visual and psychological impact of them, there are other security approaches that could be considered by the applicant that could perhaps offer a more aesthetic alternative and provide a good level of security.

Installing a shop front which offers an independently third-party certified level of manual attack-resistance could be considered. The applicant is directed to the recommended minimum manual attack-resistant security standards in the online generic Secured by Design Commercial 2023 design guide. The standards contained therein are minimum recommendations and consequently, consideration may need to be given to exceeding these if the perceived risks demands it. The most appropriate security/burglary rating would need to be ascertained through dialogue with the product manufacturers/suppliers and determined on a risk-assessment basis. Products which have been tested and importantly, possess independent third-party certification from a UKAS-accredited certification body and in the name of the manufacturer/fabricator to a recognised manual attack-resistant security standard provide a proven and demonstrable level of manual attack-resistance, which varies depending upon the respective security/burglary rating. Of note, glazing forms part of the test criteria for the security standards LPS1175 and STS 202.

It is also worth stating that for fabricators of finished aluminium framed doors and windows to accurately claim their products have relevant independent third-party security certification, they must possess this certification in their own name, rather than seeking to rely upon such certification in the name of an upstream aluminium system/component company who supply them.

Where non-security certified door/windows are used (which comes with a degree of risk acceptance), installing laminated glazing within these which is independently certified to BS EN356:2000 (Glass in Building - Security Glazing -Testing and Classification of Resistance Against Manual Attack) and at an appropriate Resistance Class (again determined via discussion glaziers etc) could be an option.

Attention is also drawn to the Hammerglass security glazing product, which has police Secured by Design preferred specification approval. Marketed as the "invisible shutter", it could be used for the shopfront glazing in place of conventional glazing. It is lighter, thinner and much more attack-resistant than conventional glazing to provide 24/7 security. According to the website, it is "300 times stronger than glass and virtually unbreakable". – The following link provides further information should that be of interest - Unbreakable window glass | Secure windows | Hammerglass

**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

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