



STAFFORDSHIRE
POLICE

Planning Department
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Early Intervention & Prevention Unit
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Weston Road
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Date: 6th October 2023

Application: SMD/2023/0496
Location: The Old Bowling Green, Leek Road, Cellarhead
Proposal: Construction of 9 extra care units (C2), communal lounge/office and associated works

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. Staffordshire Police would have no objection to the principle of development on the application site nor to the broad proposals. However, in the light of the fact that "Designing out crime and designing in community safety should be central to the planning and delivery of new development" (NPPG), designing out criminal or anti-social opportunity and creating as safe a living environment as can be provided would be advisable. To this end, the following comments, observations and advice are provided.

2. The site would significantly benefit from being enclosed to the side, to the rear and where it borders Kingsley Road by established hedging, which would be maintained to provide a good buffer and limit access to the site entrance off Leek Road. While there is a Landscape Proposal drawing, there is no boundary treatments drawing. The properties that would back on to the Sub 4 site will need to have a suitably robust boundary treatment to aid security and privacy. External hedging facing the Sub-4 car park could be used to soften the appearance of fencing, add interest and provide a supplementary security benefit to those residential units that will back on to it. Other publicly accessible rear garden boundaries could be protected in the same way, such as the side garden boundary of the unit nearest to the site entrance. Incidentally, one presumes that the Sub-4 site would be enclosed by fencing and a lockable gate.
3. The site would be self-contained with no through routes, which should reduce the likelihood of and justification for casual intrusion into the site. Some suitable road treatment and/or entrance feature to the development could be used to further emphasise the 'private' nature of it. The presence of a dwelling directly facing down the access road should provide a sense of natural surveillance over the approach to the development.
4. The development will need to be suitably lit by columns and building mounted lighting to provide a safe living environment, aid natural surveillance and deter unwanted attention.
5. While the communal building containing lounge/office etc has been located at the southern end of the development (perhaps as a buffer to road noise etc), there would undoubtedly be merit in relocating this to a more central position and undertaking some internal reconfiguration to provide the main office at the front of the building rather than at the rear. This could enable greater opportunity to observe activity within the development when the facility was in use particularly by staff occupying the office.
6. There is no indication on the Landscape Proposals drawing that access from the front of the individual units to their private rear gardens will be denied – open access points are currently shown. It will be imperative that suitable height (minimum 1.8m) fencing and lockable gating is provided as close to the front of the building line as possible to provide security for the rear of the units. This is important in any residential setting, but even more important where potentially vulnerable people are concerned.
7. Personal safety and dwelling security are important considerations for residents in any setting, but would be particularly important where more vulnerable people are concerned. The bullet-pointed extracts at the top of this response also identify that they are important in terms of local and national planning policy too. In addition to providing a layout, which deters criminal and anti-social opportunity, Staffordshire Police recommend that the dwellings within this development satisfy the recommended minimum physical security requirements contained within the police Secured by Design Homes 2023 design guide (or any subsequently published version) available online. This would undoubtedly be for the long-term benefit of the future residents. While there may be specific considerations owing to the nature of the residents, of particular importance would be to factor in at this planning stage (and ultimately install at the construction stage) external doorsets (plus adjacent panels) and windows, which have been tested to, and importantly, are fully certificated by an independent third party, accredited by a United Kingdom Accreditation Service (UKAS) Notified Body in the name of the manufacturer/fabricator 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. Such independent 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. The applicant is directed to the online guide (see link below) for further information on recommended minimum security standards, in addition to the raft of other useful crime prevention and community safety-related, layout and physical security information contained therein.

8. One further consideration to enhance the security of the development might be to incorporate a small-scale CCTV camera system. While CCTV is not a universal solution to potential security issues, the incorporation of a bespoke CCTV system for this development (with perhaps cameras externally mounted on a more centrally located communal building) could be a positive addition providing greater peace of mind for residents, deterring unwanted attention and enabling useful images to be captured should the need arise. Ultimately, where CCTV is being considered, it would be essential from the outset for the applicant to draft a CCTV Operational Requirement to establish the remit of any CCTV surveillance camera system, what areas need to be covered and for what purpose, and to help inform system requirements with a view to ensuring the professionally designed and installed system ultimately served its intended purpose. In terms of designing and installing a fit for purpose system, 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.
9. 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

For more information on Secured by Design, design guides and interactive 3D design guides, visit www.securedbydesign.com