



STAFFORDSHIRE
POLICE

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Early Intervention & Prevention Unit
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Weston Road
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Date: 17th October 2023

Application: SMD/2022/0267
Location: Land at Blythe Park, Sandon Road, Cresswell
Proposal: Reserved matters application for layout, internal access arrangements, scale, appearance and landscape details for phases 4 and 5 (157 residential dwellings and community uses) The outline application was an EIA application and an Environmental Statement was submitted to the council at the time. SMD/2018/0789
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.

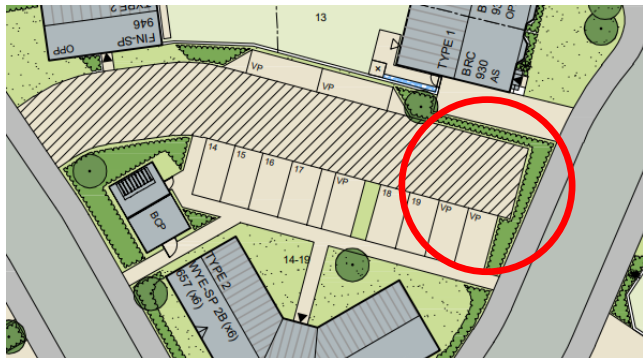
The following comments should be considered in the light of the following:

- 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 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 are broadly supportive of the revised information reserved matters layout proposals contained within this application, although it is attention to layout detail as well as around physical building security where most crime prevention and community safety gains could be made.

2. Existing hedging appears as though it will enclose much of the front of the site where it borders Sandon Road, providing a visual screen aside from other benefits. The main site entrance would be well defined and overlooked. The footpath in the northern corner linking the site to Sandon Road would also benefit from being directly overlooked from a number of dwellings. The removal of the potential footpath link from the new development through to the existing Sandon Close is welcomed. This entirely eliminates potential issues that might have arisen with such a linkage (for example, nuisance impact upon residents of abutting properties from anti-social behaviour) and ensures that both the existing Sandon Close development and that corner of the new development will be essentially more private and secure, since it removes the justification for anyone and everyone to wander through.

3. One specific location where an enhancement is recommended to prevent potential shortcutting is in relation to hedging at one end and to the rear of car parking serving apartment plots 14-19. Although there is a footpath link, human nature being what it is, there is a likelihood of shortcuts being made through the hedging within the area circled. Providing some suitable metal railings to reinforce the hedging may reduce this potential.



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 (and side, where appropriate) 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 providing an a good even level of light, avoiding pools of darkness/dark recesses and providing excellent colour rendition would address this and 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. The Local Planning Authority should satisfy itself that this will be the case. Of note, bollard lighting should be generally avoided as it does not provide an adequate and even level of illumination in terms of natural surveillance, providing a safe environment and deterring crime.
5. In terms of natural surveillance, dwellings would address the road network throughout the site and provide good views over it with habitable rooms located at the front and seemingly dual-aspect corner dwellings will be incorporated. The mutual security benefit of dwellings positioned and orientated to enable views towards one another is realised without compromising privacy. Such aspects are ideal at promoting a sense of security and community, increasing risk to anyone with possible criminal/anti-social intent and enabling suspicious behaviour to be more readily identified by residents. The parking courts relating to the 3 small apartment blocks should be generally well overlooked from the respective blocks as would much of the open space within the development from generally well-positioned dwellings.
6. The combination of garage, frontage and side parking within the development appears sound with limited dislocated parking evident. Most side parking would benefit from at least one non-opaquely glazed window providing the opportunity for observation of vehicles parked there from the property or a sense of the same to deter unwanted attention. However, this principle does not appear to be universally applied. For example, it would appear that side parking for plots 118, 124, 137, 147-148, 151-152 will not be overlooked from those respective properties. It is recommended that any improvement in this regard where this situation arises within the development (by no means limited to the above) should be considered to aid vehicle security and reduce criminal opportunity.
7. Most of the community facilities should be reasonably well overlooked from housing, especially so the enclosed play area. The meandering footpath should also encourage residents such as dog walkers to wander close to these facilities, and thereby discourage misuse of them to some

extent and certain negative attention that they can sometimes attract. The MUGA will only have some limited direct natural surveillance, but the issue of potential noise nuisance clearly has a bearing upon proximity to housing – a reasonable balance appears to have been struck. The community centre has generally clean external lines with no recesses/alcoves, which can attract a range of misuse and should benefit from two sides being well overlooked and the front also subject to some overlooking.

8. The mutually secure and ideal arrangement of rear gardens backing onto one another (either new or existing) to create outward-facing blocks has been extensively used within this development, generally to good effect and is to be welcomed. The standard 1.8m high rear garden boundary treatments used throughout the development are reasonable and fencing/gating has been positioned (where it allows) quite close to the front of the building line in places, which is highly desirable. For all plots, unauthorised access from the front of dwellings to the private rear gardens should be denied. A number of rear access paths serving mid-terrace plots are shown as gated and in the main quite close to the entrance to the path. There are some anomalies though, which warrant reconsideration. For example, that serving plot 51 is set well behind the building line (because the path also provides access to the rear of plot 50). This is undesirable in terms of security as it enables potential offenders to more easily disappear out of sight rather than be more exposed and in greater view. In this instance it is recommended that a supplementary lockable gate (lockable with a key from both sides and minimum 1.8m height) is added at the entrance to the path. Residents of plots 50 and 51 would be provided with keys. The same would apply for any similar situations elsewhere, whose future residents would benefit in terms of enhanced security from additional shared lockable gating.
9. Some rear garden boundaries will be more accessible/abut public space, which could render them potentially more vulnerable to intrusion (and/or criminal damage/graffiti). In places it looks as though external defensive planting/hedging is proposed, which if well-conceived, could supplement the fencing and provide a defensive buffer. When used, this approach can be a very effective means of protecting them. Furthermore, such planting can have an aesthetic benefit by softening the appearance of a boundary treatment as well as adding interest and having very obvious ecological benefits. Raising fence heights slightly or including 300mm wooden trellis topping can also be used to improve rear garden security, where appropriate. The applicant should determine what scope there might be to extend this principle to other rear garden boundaries (such as, but not necessarily limited to plots 1, 34, 124, 153, 146 and 161). With regards to the plot 34 side garden boundary, external planting could also reduce the possibility that it could have balls kicked against it etc.
10. In relation to the 3 apartment blocks, their orientation and layouts should offer a high level of natural surveillance in most directions. It will be important that the external communal entrance doorsets provide a robust barrier to unauthorised entry. Similarly, the individual apartment entrance doorsets will need to provide the residents with the same level of manual attack-resistance as if they were front doors situated on a street. They should also include some means for observing who is at the door before it is opened (such as a fire-rated door viewer) and some form of door restrictor (chain/bar). To this end, it is recommended that communal entrance and individual apartment entrance doorsets 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 physical security standard are installed. Ground floor/accessible windows should also be certified to one of these same standards. Independent third-party security 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. Doorsets and windows would also need to be 'fit for purpose', in terms of being appropriately rated regarding their expected usage (light, moderate, heavy etc) as per BS6375 (performance of doors and windows).
11. Where there is a requirement for an apartment block doorset to be fire, smoke and security rated, the finished product being supplied to site by the manufacturer or fabricator should possess a single independent third-party certificate from a UKAS accredited certification body satisfying all those performance elements. Where the requirement is just fire and security, a single certificate as per above should satisfy both performance elements.

12. It is recommended that each apartment block incorporate a suitable visitor door entry and access control system with a vandal-resistant external door entry panel with a linked camera at each communal entrance to enable audio/visual communication between visitors at the respective communal entrance and individual residents within their apartments, with remote release from each apartment to admit bona fide visitors. The visitor door entry and access control system should avoid the incorporation of a traditional tradesperson or time-release button. Historically such buttons have been abused and can significantly undermine building security by admitting non-residents resulting in a range of ASB issues as well as compromising resident safety. Meet and greet is not recommended for apartment blocks of the size proposed.
13. A workable solution will need to be provided in each apartment block for routine postal receipt and receipt of parcels, which does not compromise the security of the block, adversely impact fire safety or provide opportunities for theft of personal items etc.
14. The apartment communal bin store and cycle stores will need to be suitably robust (general construction and doorset – security certified doorsets recommended), have access restricted and deny opportunities for misuse within, fly tipping by others, criminal damage and theft that can sometimes be associated with such facilities. Cycle stands should be provided that will need to enable cyclists to secure both wheels and the frame in situ (the most secure arrangement) should they choose to do so. The type of cycle stands that only allow the front wheel to be secured provide inadequate security since quick-release front wheels can result in the rest of the cycle being stolen.
15. The police Secured by Design Homes 2023 design guide available online (which seeks to provide best practice in terms of crime prevention etc to the design and construction sectors) not only provides comprehensive information on the relevant physical security standards for relevant apartment doors and windows etc and 'fit for purpose' criteria, it also contains a range of guidance covering such areas, as visitor door entry and access control systems, security postal receipt arrangements, emergency door release devices and emergency (fire service) access, bin and cycle storage, CCTV etc.
16. Of course, conventional detached, semi-detached or terraced dwellings will form the vast bulk of the residential accommodation at this development site. Personal safety and dwelling security are important considerations for the majority of homeowners/householders. 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 conventional houses as well as the apartment blocks within this development satisfy the minimum physical security recommendations contained within the aforementioned Homes 2023 design guide. Such an approach which utilises products with security certification accords with the NPPG - "Designing out crime and designing in community safety should be central to the planning and delivery of new development". Of particular importance for the houses would be to factor in at this planning stage (and ultimately install at the construction stage) external doorsets (plus adjacent panels), ground floor/accessible windows and garage doorsets, 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, which would undoubtedly be for the long-term benefit of the future residents. It is recommended that the applicant consult the Homes 2023 design guide in order to ensure that pertinent general layout and physical security aspects have been adequately considered and would be included wherever possible.
17. In relation to the communal facilities, only the side of the building facing the MUGA would not be directly overlooked and if it happens anywhere, this elevation could be the one most likely to experience unwanted anti-social attention. This blank elevation (aside from a double doorset) also has some potential to be used as a football rebound wall on occasion (despite the presence of the MUGA). Any layout improvements (such as railings along the pavement edge, along the curved grass area opposite, an area of railing enclosed shrubbery?) that can be done to

discourage this may be worth considering. Adding some anti-graffiti coating to this wall might also be worth including. Suitable external CCTV coverage could also play its part.

18. There is no indication that any vehicular access control to the parking area will be incorporated, which would be worthy of consideration to prevent vehicle-borne gathering by those out of area when the community facilities are not in use. Furthermore, providing unrestricted vehicle access beyond the parking spaces to the quieter side/corner between the community centre/MUGA could be unwise and encourage a range of unwanted outside attention (include drug activity). Consideration should be given to restricting unauthorised access at this point. If incorporated, some control arrangements could allow shop delivery/service vehicles to access it when required, but deny general vehicle access.
19. It is noted that the shop will have a new aluminium framed doors and windows frontage. The nature of the shop does not appear to be stated (presumably a convenience store), but it would be advisable for this frontage to be protected by anti-ram vehicle bollards irrespective of any vehicle access control arrangements for the car park entrance (as offenders will drive over pavements/grassed areas, through planted borders etc if required). Such bollards would also aid pedestrian safety given incidents reported from time to time where drivers lose control of their vehicles. Depending on the nature of the shop, it may be necessary for the shop frontage to also afford suitable protection from a dead-of-night smash and grab type attack (using sledgehammers etc) by organised offenders. Convenience stores selling tobacco products have been subject to these on occasion over the years. A combination of appropriately-rated security certified doorsets, windows (glazing) and shutters could provide a suitable physical barrier and visual deterrent. Of note, 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.
20. Albeit a generic document, the applicant can find guidance on recognised manual attack-resistant security standards (such as LPS1175 and STS202) in the Secured by Design Commercial 2023 design guide available online (or any later published version). Of note, the standards contained therein are minimum recommendations and consideration may well need to be given to exceeding these, if the perceived risk demands it. A suitable risk assessment and direct engagement with third party security certified product manufacturers is advisable to ensure the correct level of protection is provided. This principle would apply to the external doorsets and windows within this community building in general. Where they exist, installing products 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 the latest version of a recognised manual attack-resistant security standard 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. Utilisation of such independent third-party security certified products (which are widely available and satisfy rigorous material performance standards aside from security ones) 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 about which the end user may be unaware. Simply alarming the shop will not necessarily deter determined offenders nor would the presence of CCTV cameras, although both could be useful. The latter could also be very useful to help deter misuse of the area to the side of the shop and in relation to shop theft etc. Fogging devices (if appropriate) could also be considered as supplementary to robust physical security.
21. Comparatively low buildings such as within schools, community centres etc can be subject to misuse and criminal damage resulting from youths climbing onto roofs. The enclosed porch to the community hall will be flat roofed, lower than the rest of the roof and subject to limited natural surveillance. Were anyone to gain access to the porch roof, access to the rest of the roof would be easily gained. The applicant will need to ensure that the porch roofline is sufficiently high to prevent youth access (including with a leg-up) and that no external climbing aids are inadvertently incorporated. The incorporation of a non-aggressive anti-climbing product along the edge such as Roller Barrier might be worth considering.

22. Burglary offenders of commercial premises are not averse to attempting to force entry via the walls or the roof, where they are thwarted via well protected apertures elsewhere and depending upon a range of circumstances. While noise would be likely to attract the attention of surrounding residents and thus discourage offenders in relation to the walls of the shop, the low and shallow roof might not necessarily rule that out. Securilath™ is a proprietary expanded metal product designed to offer suitable protection for roofs and benefits from appropriate independent third-party certification to a recognised manual attack-resistant security standard (LPS1175) to a number of proven levels. The applicant should consider incorporating it for the shop element as part of the building conversion project.
23. The play area will be enclosed with 1200mm bow top fencing/gating, which is ideal. However, it is worth noting that this will meet the community hall in two places. The likelihood that this might provide a possible climbing aid at those points (and if so, how might this be mitigated) would need to be considered. With regard to the external community building downpipes, boxing these in could help protect them from damage and deny the opportunity to try to climb them.
24. While there are many strong crime-resistant attributes to the revised proposals, the above observations, comments, recommendations and attention drawn to the Homes and Commercial 2023 design guides have been provided with a view to encouraging criminal and anti-social opportunity to be designed out and community safety to be designed in as far as it is possible, in line with national and local planning guidance, and good practice design guidance.

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

Note 1 - For more information on Secured by Design, design guides and interactive 3D design guides, visit www.securedbydesign.com

Note 2 - 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)’