



STAFFORDSHIRE
POLICE

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

Early Intervention & Prevention Unit
First Floor, Block 6
Staffordshire Police HQ
Weston Road
Stafford
ST18 0YY

Date: 12th March 2024

Application: SMD/2024/0067

Location: The Tawny Hotel, Consall Lane, Consall

Proposal: Installation of new 300kW solar photovoltaic array inclusive associated infrastructure (total 887 PV modules) including additional screen planting to rear of site

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 Healthy and Safe Communities, Para 96(b) of the NPPF 2023 states "Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings 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 and Beautiful Places, Para 135(f) of the NPPF 2023 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"
- 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 submission of the above on a recent weekly list of validated planning applications is noted. The proposals will enable the applicant to generate their own renewable energy and store it to serve the wedding venue and hotel, something which has undoubted merit on a number of grounds – environmental, economic etc. While Staffordshire Police have no objection to the proposals, the applicant's attention is drawn to the fact that photovoltaic (pv) arrays in rural settings can be vulnerable to criminal activity with the theft of copper cabling, pv panels etc. This can involve well-organised criminal gangs who exploit security weaknesses and in the worse cases, result in considerable losses. The following article gives a little insight on the matter - [Weekend read: 'Solar crime' on the rise – pv magazine International \(pv-magazine.com\)](https://www.pv-magazine.com/2023/03/12/solar-crime-on-the-rise/).
 2. There is no reference to security within the Planning Statement nor any indication that there will be any security measures provided in relation to the proposals. While the site is well bounded to the north and south, the eastern boundary bordering the car park could allow easy access, particularly via the field gate, the chain securing it probably being easy to crop. There will

seemingly be nothing to separate the western boundary of the pv array from the remainder of the (retained) field. Consequently, were anyone to use a vehicle to access the field (via the open field gate to the north opposite Old Hall Farm) or by cutting the barbed wire fence at a convenient point along Consall Lane boundary, it could be feasible for them to have direct access to western side of the pv array and once there, they would not be easily observed, especially during the hours of darkness.

3. The likelihood of offenders actually targeting this location is of course entirely a matter of conjecture and perhaps only time would tell. Offenders either consciously or subconsciously will generally undertake a risk versus reward analysis when considering criminal activity. How the site is demarcated, the nature and extent of any deterrents to offending, the likelihood of detection (people nearby, technological means etc), the time delay any security measures might result in and the likelihood/nature/speed of any response to detection are all factors (among many) that can influence offender decision-making. This proposed pv array differs to quite an extent with many other pv arrays, in that it is smaller than most, it is less isolated and the ability for offenders to operate undetected/without being disrupted may perhaps be perceived to be reduced. From Consall village, Consall Lane is the only way in and out by vehicle (which would be required to move items off site), which potentially increases risk of offenders being trapped should their presence be detected. The presence of the hotel and wedding venue, the accommodation pods along the outside of the southern boundary, the activity associated with all this, plus the small number of dwellings on Consall Lane to the north etc all might potentially reduce the ease with which offenders could operate without attracting attention to themselves. One imagines that there is a strong sense of neighbourliness with locals looking out for one another in this area. Nevertheless, the presence of Consall Woods nature reserve and constant turnover of those attending the hotel/wedding venue will mean that unfamiliar vehicles and faces are an everyday occurrence. The presence of the pv array given its proximity to the car park will certainly be evident to anyone attending the location who might possibly have an interest in such matters.
4. It may be that the applicant has given due consideration to any potential security risks (theft, disruption to supply etc) that might possibly attach to this project and has discounted them for any number of reasons, which might include those briefly mentioned above. It may be that certain measures will in fact be included, but are not disclosed within the application documentation. However, it may be that the applicant has given no or very little consideration to security and these comments are provided with a view to prompting them to do so and take the appropriate action (or none if that conclusion is reached) on a risk assessment basis, as seems fitting to them. The 2013 document 'Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems' published by the BRE and available online contains some useful advice regarding security, and as such, attention is directed to it.

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

Note - Incidents of theft can occur during the construction phase of any development. 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)'

