



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: 21st March 2024

Application: SMD/2024/0076
Location: 50 Coleridge Drive, Cheadle
Proposal: Application for a Lawful Development re: use of a C3a dwelling as a children's home for a maximum of four children, with up to three carers, two of whom will sleep overnight, working on a rota basis (C2)

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 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".

-
1. Having spoken with the Local Policing Team (LPT) Inspector who recently attended a public meeting in Cheadle (unconnected with this planning application, but within which this application was raised), Staffordshire Police are aware of some community concerns about the potentially disruptive impact to residents such a children's care home might bring, particularly in terms of anti-social or criminal behaviour. Having reviewed the documentation on the website, the range of community concerns are clearly set out in the various resident submissions. In terms of potentially vulnerable looked-after children themselves being exposed to criminal influence or exploitation, there is nothing about the location that raises any LPT concerns.
 2. As with all residential care homes for children, amongst other factors that contribute towards the successful operation of the home or otherwise, a tremendous amount depends upon: the professionalism, care and experience of the staff; how well they bond/engage with and relate to the children in their care and meet the children's wide-ranging needs; the effective management oversight of the home; the historical context, experience and nature of the children; the

placement of appropriately risk-assessed children with suitable individual care plans in place, who also get on sufficiently well with and are not a bad influence upon each other; and adherence to robust and effective staff policies (including in-house conflict resolution) and operating procedures. These factors are generally unknown and unknowable at this stage.

3. There are also standard requirements on the part of care home operators to adhere to the 'Children Missing from Home and Care' Joint Protocol between Staffordshire and Stoke-on-Trent Local Authorities & Staffordshire Police and they will need to be registered with Ofsted, the appropriate regulatory authority and subsequently overseen by them with all the necessary checks and balances in place that they require to ensure the efficient running and management of the home for the benefit of those children who would be placed there.
4. The presence of a small play area on the grassed public open space above and behind the site has been voiced as a particular concern. While the impact upon those who currently use this might be an issue, one might also expect that they are of an age where they are accompanied by parents. The play area is certainly in an open aspect and overlooked by houses opposite, which could reduce the opportunity for misuse and conflict. In addition, one might expect appropriate supervision and rules for the looked-after children aimed at reducing the likelihood of such conflict. Clearly a matter of conjecture, this is not an issue that could warrant a police objection. Indeed, it must be pure speculation to assume that a children's care home would automatically generate issues for the local community just by its very presence as a well-managed home, staffed by experienced caring professionals with suitably placed children can operate successfully without adversely impacting the community within which it is located. On balance, Staffordshire Police would have no objection on crime and disorder grounds to the *principal* of such a home here. However, there are some specific concerns with this application.
5. At first glance, the supporting documentation appears quite impressive with various policies etc submitted on behalf of the applicant, which seeks to convey a professional image on the part of the care company applicant. However, as a number of the residents note within their objections, there do appear to be a number of inconsistencies and inaccuracies within some of the applicant's planning documentation, which raises some questions about how bespoke and accurate this documentation is, and truly representative of the applicant and their proposed operation. For example, on page 4 of the Statement of Purpose it states "Orchard House is owned and managed by Acorns to Oaks Children's Care & Support", although the applicant is E&E Care. Acorns to Oaks are also referenced on page 19. Towards the top of that page under 'Registered Provider of the home' is the highlighted answer "Name and Address of Company" – clearly this part of the proforma/template has not been filled in! On Page 8 of this document it states "The home is situated close to the beach and lots of other attractions. It is close to local amenities, shopping centres, cinemas, bowling alleys and New Brighton is a short journey away which is full of fun packed activities to do", this reference clearly relating to another application. Page 7 states "There is a fitted CCTV system for the front and rear of the property". However, page 3 of the Management Plan states "CCTV for security will be installed at the external of the property should it be required" contradicting the previous statement. Paragraph 2.15 of the Planning Statement states there would be "a maximum of two children aged from 8 to 18 years", the proposal description above states four children, which the Statement of Purpose also states, but with "ages of 7 and 17 years". The Application Form and Planning Statement states that the applicant is Empower & Endeavour Care Ltd (E&E Care). By contrast, the logo at the top of other documents such as the Statement of Purpose states the company to be Elevate & Empower. Such errors, inaccuracies and contradictions raise the question - how much of the other information supplied is accurate?
6. By coincidence, Staffordshire Police are aware of a recent unrelated planning application for a children's care home in a different Staffordshire local authority from a different applicant, but with the same agent, which bears very much the same hallmarks in terms of documentation as this application. Indeed, when one compares and contrasts the Good Neighbour Policy of each, they are essentially the same document, rebadged and with a few words amended as necessary to suit the respective applications. The same applies to the in-depth Statement of Purpose documents, which are almost identical word for word including the patently wrong comments about being close to the beach and New Brighton being a short journey away etc – both are in Staffordshire. The other application also has CCTV fitted front and back! Much of the documentation supplied in relation to this application appears to have been simply copied and

pasted wholesale from an unknown application, and simply amended accordingly to suit this application. Reference to Oaks to Acorns in this documentation is one clear indicator. Incidentally, the other Staffordshire application makes a mistake in 'their' Good Neighbour Policy, referencing the wrong care company! This potentially raises a host of serious concerns around accuracy, validity, credibility, ethics etc and cause one to question whether they really are the care company applicant's own documents, policies, proposed operating practices etc, despite being presented as such. Has the applicant even seen these documents, let alone will they operate by them? They seem to be generic policies, statements, documents etc rebadged and with minor amendments to suit the respective care company client, thus containing information which may be inaccurate or potentially wholly misleading about the applicant and the proposed nature of their operation. If this is the case, one might imagine that amongst other things, this could increase the risk of the sorts of concerns expressed by the local residents being realised.

7. The details of the other application referred to above and that bears a worrying similarity to this application will be provided separately to the planning officer handling this case to further assist them in assessing this particular application - a lawful development as a care home for children. There is also a third planning application for a children's care home (subsequently approved) in a Staffordshire Local Authority that had very similar documentation. That too, was allegedly close to the beach!

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