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Early Intervention & Prevention Unit
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Date: 4th October 2022

Application: SMD/2022/0438
Location: Stonehouse Farm, Ash Bank Road, Werrington
Proposal: Demolition of existing buildings on site and erection of a Class E retail unit (Co-op) alongside access, car parking 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 CABA 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. In the light of the importance placed upon designing out crime and designing in community safety as per the bullet points above, the following comments, observations and recommendations are made in connection with the proposals and could benefit the applicant.
 2. The site is a prominent one on a reasonably busy main road and should attract passing trade as well as that from local residents. The prominence of the location and accompanying generally good level of natural surveillance from which the site will benefit may reduce the likelihood it would attract criminal (or anti-social) attention. However, history and experience demonstrate that if criminal offenders deem the potential reward is high enough, a prominent well-overlooked location will be targeted anyway. Particular risks over and above day-to-day ones of shop theft etc during opening hours, which Co-ops can be readily subject to, would include out of hours burglary/smash-and-grab raids notably targeting tobacco products or targeting of the contents of

the ATM. Both involve organised criminality. Consequently, the applicant should ensure that a risk commensurate level of physical and technological security is incorporated from the outset. Motivated offenders would be likely to seek to exploit any perceived shortcomings.

3. The site will be subject to good views in from Ash Bank Road. There can be respective merits in being able to restrict vehicle access to the site outside of opening hours to prevent unwanted gathering of vehicles and misuse/nuisance that can sometimes arise, and to reduce criminal opportunity as it relates to targeting of the building. There is no suggestion that vehicle access to the site would be restricted out of hours but this is something the applicant may wish to consider. Bollards are proposed around two elevations of the building presumably to protect pedestrians, but also to protect the building from ram-raiding. Should a proven and demonstrable level of resistance to vehicle ram-raid attack be required by the applicant, they would need to opt for bollards which have relevant third-party certification to a suitable impact test standard (such as PAS68:2013, IWA 14-1:2013 or PAS170-1).
4. A 1.8m high close boarded fence is to be added along the full extent of the western boundary where it will border a couple of residential properties. The Proposed Site Plan indicates a gate and short section of fencing will be added at the front of the building line presumably to prevent casual outsider access down the western side of the building. However, according to the plan, anyone would be able to wander around the south-east corner of the building to the hidden rear. The applicant should give consideration to fencing/gating off the rear at this south-east corner. This would at least reduce opportunity for any low-level misuse of what would be a hidden space.
5. Four stainless steel cycle hoops are to be positioned in a highly visible position in front of the Ash Bank Road elevation. This good level of natural surveillance is welcomed as is the opportunity these hoops should afford cyclists to secure both wheels and the frame in situ (the most secure arrangement) should they so choose.
6. Building apertures are the most likely out of hours attack point for offenders that require protection. There can be a vast difference in pedestrian access doors (including steel ones) in terms of the level of attack-resistance they provide, which isn't always apparent from their appearance. The applicant is directed to the manual attack-resistant security standards referenced in the online generic Secured by Design Commercial Developments 2015 design guide (or any subsequently updated version). The standards contained therein are only intended to be generic minimum recommended requirements and these will certainly need to be exceeded at this location. The most appropriate security/burglary rating would need to be ascertained through dialogue with the product manufacturers/suppliers and be on a risk commensurate basis. It is also worth noting that later versions of many of the security standards contained within the design guide have been published and it is products certified to these that should ultimately be considered. Where they exist, installing products such as doorsets with third party certification from a UKAS accreditation body to the latest version of relevant security standards (such as LPS1175 or STS202) 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. The glazing will need to be securely retained within the windows and comprise laminated glazing certified to the security performance standard BS EN356:2000 (Glass in Building - Security Glazing - Testing and Classification of Resistance Against Manual Attack) at an appropriate Resistance Class. The appropriate Resistance Class will also need to be ascertained through dialogue with the product manufacturers/suppliers and be on a risk commensurate basis. As a realistic alternative, police preferred specification security product Hammerglass (www.hammerglass.com), marketed as the "invisible shutter" could be installed at a thickness offering an appropriate level of manual-attack resistance in place of laminated glass. For the comparable level of attack-resistance, Hammerglass is significantly thinner and lighter than laminated glass, which can have significant building construction advantages.
7. Utilisation of third-party security certified products (which satisfy rigorous material performance standards aside from security ones) provide a tested, 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 to the detriment of the end user.
8. It is also worth stating that for fabricators of finished aluminium doors and windows to claim their products have relevant third-party security certification they must possess this 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.

9. Were supplementary security measures (such as roller shutters or security grilles) to be incorporated, it is recommended that these should also possess the same third-party security certification discussed above and at an appropriate security/burglary rating commensurate with the perceived risk. Again, direct discussion with manufacturers/suppliers would be required.
10. In some circumstances, commercial buildings can be subject to criminal attack through the wall or even roof, bypassing aperture security. While it is acknowledged that noisy attempts to do so would be likely to attract the attention of surrounding residents and could discourage offenders, it may be prudent to ensure that the walls and roof are designed to withstand such attacks and materials resistant to manual attack or damage are used to ensure the initial provision of security.
11. It is noted that an ATM is to be incorporated into the new build. ATMs can be subject to a range of criminal activity. At the least, fairly subtle criminal activity such as installing a card skimming device or the use of the ATM with a stolen card etc can occur. Of course, more violent targeting of ATMs undertaken by criminal gangs is at the other end of the scale. The nature and extent of security measures that will protect the ATM and operating procedures around replenishment etc are understandably not disclosed, although bollards are indicated. The applicant should comply with the publicly available document that seeks to offer good practice and minimum security standards in relation to the ATM itself and host premises - *'Best Practice for Physical ATM Security'* published by the ATM Security Working Group. Members of the British Security Industry Association also have access to their document – *'Security of ATMs Effective Practice Guidelines'*. The fact that the ATM appears to sit within the main shop space (rather than being housed within a separate room) will require safe replenishment of the ATM to be undertaken outside of shop opening hours. Certainly the ATM will need to be provided with a good level of CCTV coverage both inside the store and externally.
12. The installation of a bespoke professionally designed CCTV surveillance camera system does not appear to be referenced within the application documentation, but will no doubt form part of the security strategy for the store and would certainly be a recommendation. This could provide a deterrent to a range of offending, offer reassurance to staff and capture excellent quality images to further an investigation should the need arise. This should be supplementary to rather than instead of robust physical security and access control arrangements. Appropriate camera coverage should be provided internally and externally, the latter compensating for the unrestricted site access out of hours. Furthermore, such provision could be useful to deter a range of criminal activity that can take place at supermarket car parks (albeit this is a small one) externally during opening hours such as distraction thefts targeting older customers, drug exchanges, thefts of catalytic converters from cars etc.
13. When considering the use of CCTV, end users must be very clear about the objectives they wish to meet and establish a policy for its use and operation before it is installed. The end user must answer the question, 'what do we want the system to do for us?'. The development of a comprehensive CCTV Operational Requirement (OR) for the system, which can be supplied to CCTV installers during the tendering process is crucial. An OR will be used for the design, performance specification and functionality of the CCTV system. In effect, it is a statement of potential issues, not solutions and will highlight the areas that must be observed by the system and the times and description of activities that could give cause for concern. If an OR has been well drafted to ensure the installed CCTV system will be fit for purpose and satisfy the end user's objectives, and the installed system satisfies this OR then a positive outcome is achieved all round. A well-drafted OR enables the end user to hold the installer to account should the installed system fail to meet any requirements that have been laid down. Ultimately the drafting of a site-specific well-drafted comprehensive OR and its fulfilment with a suitable system will be a matter for and between the two parties involved.
14. There is a range of CCTV guidance information available to the applicant that can assist them. This includes (but is by no means restricted to) the following:

- The Surveillance Camera Commissioner's Passport to Compliance documents, which provide a guide through the relevant principles within the Surveillance Camera Code of Practice. It informs the necessary stages when planning, implementing and operating a surveillance camera system to ensure it complies with the code.
 - The 'Surveillance Camera Commissioner Buyers Toolkit' is a comprehensive easy-to-follow '5 steps to achieve success' guide for non-experts thinking about buying a CCTV system and want to ensure they avoid common mistakes and buy an effective system that does what they want it to do. It is full of advice and tips on how to get the best out of any prospective supplier. It also covers relevant standards and current legislation.
 - For CCTV recordings to be effective in detecting and investigating crime they must be fit for purpose and easily accessible by police investigators. Given that images may be used by the police or in an investigation, any CCTV system installed would need to ensure that any CCTV surveillance system satisfies the ACPO/Home Office produced 'Police Requirements for Digital CCTV Systems' guidance available online, which albeit rather old contains some important guiding principles.
15. If a remotely monitored, detector-activated CCTV system is being considered, it would need to be installed in accordance with BS8418:2015 - *Installation and remote monitoring of detector operated CCTV systems – Code of Practice*.
 16. Regarding the design and installation of a CCTV system or intruder alarm 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 or intruder alarm systems respectively.
 17. Where a police response is required in response to activations of a security system (for example, an intruder alarm system, detector activated CCTV system, hold-up alarm etc), there would need to be compliance with the Police Operational Advice and Security Industry Requirements for Response to Security Systems found within the NPCC Security Systems Policy (May 2021).
 18. Shop staff should be afforded the opportunity to be able to remotely lock the shop doors from behind the service counter should they feel threatened (for example, a potential robbery situation). Consideration should also be given to the installation of a remotely monitored hold-up alarm to allow staff to summon assistance should they be subject to a robbery or threatened with violence. Compliance with the NPCC policy mentioned above would be required. The potential benefits to staff safety of installing a smoke generating device (ideally Secured by Design accredited) in the event of an attempted robbery (staff triggered) or burglary (linked into the intruder alarm system) could also be explored. The pros and cons of enclosure of the cashier's space will no doubt need to be considered with the benefits to security and staff safety being factored in.
 19. Internally, the door serving a security function and separating public shop space from the rear warehouse should be sufficiently robust with suitable access control measures in place to deny unauthorised entry to it during shop opening hours. Handling of cash within the building will need to be carefully considered with opportunities to reduce the amount held in tills at any one time taken to reduce the attractiveness of the location as a robbery target. Particular attention should be given to the security of tobacco products, as these have been the target of out-of-hours smash and grab type raids and even robberies from a variety of businesses going back quite a number of years.
 20. 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