



STAFFORDSHIRE
POLICE

Planning Department
Staffordshire Moorlands District Council
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Staffs
ST13 6HQ

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

Date: 12th November 2024

Application: SMD/2024/0400

Location: Playing Fields, Holt Lane, Kingsley

Proposal: Erection of 10 bungalows - 5 for the over 55s and 5 standard market

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. Staffordshire Police have no issues with the principle behind the proposed erection of 10 bungalows on the application site. The location is a quiet one and the cul-de-sac nature of the proposals has the potential to create a secluded and safe development for older residents. The absence of any pedestrian through route (more evident on the CGI images due to hedging showing along the northern boundary, but seemingly shown as incomplete on the Proposed Site Plan) has the potential to remove the justification for anyone other than the residents, their legitimate visitors and service vehicles to come on to the site. The result should be a development that is perceived to be under the ownership and control of its residents.
2. Natural surveillance from the properties (as well as from the existing Calvin Court properties) over coming and going should be good with kitchens positioned at the front of the properties to provide direct and regular visual connection with the street.
3. On the western side, the rear gardens of properties should back on to the rear gardens of existing properties to provide mutual security, which would be ideal. Along the eastern development boundary, the Proposed Site Plan advised a new native species rich hedgerow will be planted to provide a buffer with the adjacent land, which will feature the realigned Kingsley 3

footpath. There is an expectation that these rear garden boundaries here would comprise fencing of a suitable height to resist climbing and be more secure.

4. It will also be important that unauthorised access from the front of properties to the private rear gardens is restricted by suitably robust boundary treatments (minimum 1.8m high fencing and lockable gating) placed as close to the front of the building line as possible.
5. It is unclear what is proposed in terms of street lighting. It will be important that downward-facing, controllable LED column-mounted street lighting compliant with BS5489-1:2020 Code of Practice for the Design of Road Lighting supplemented by dwelling-mounted lighting at the front of dwellings (and/or side where appropriate) is included as this can contribute to a sense of safety on the part of residents, deter unwanted attention, aid natural surveillance, and assist in providing a safer driving and walking environment.
6. Personal safety and dwelling security are important considerations for homeowners/ residents. 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 site layout, which is safe, and deters criminal and anti-social opportunity, Staffordshire Police recommend that the dwellings within this development satisfy the minimum physical security requirements (where accreditation is sought under the scheme, or recommendations in all other circumstances) contained within the police Secured by Design Homes Guide 2024 (or any subsequently published version) available online. 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 ground floor/accessible windows, which have been tested to, and importantly, are fully certificated in the name of the manufacturer/fabricator by an independent third party, accredited by a United Kingdom Accreditation Service (UKAS) Notified Body to a suitably recognised manual attack-resistant security standard (such as PAS24:2022). This would be one further significant way in which the applicant could seek to design out criminal opportunity and provide a safer living environment, and would undoubtedly be for the long-term benefit of the future older residents. 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 result in an easily avoided and unnecessary vulnerability. The applicant is directed to the online guide (see link below) for further information on recommended minimum physical security standards, in addition to the raft of other useful crime prevention and community safety-related, layout and physical security information contained therein.
7. Staffordshire Police have no issues with the principle of development at this location, but attention to detail in relation to the sorts of matters discussed above could considerably contribute to a feeling of security and safety on the part of future residents as well as physically aiding security and safety.

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 - 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. The following wording 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)'