



STAFFORDSHIRE
POLICE

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

Date: 8th January 2025

Application: SMD/2024/0509

Location: The Old Court House, High Street, Leek

Proposal: Proposed change of use/conversion of unoccupied first and second floor accommodation into 12 residential units

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".

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1. In principle, Staffordshire Police welcome the refurbishment and conversion of the upper floors of this prominent building to provide living accommodation broadly in the manner outlined within the submission documentation. In terms of a development which operates without generating incidents or attracting issues of a policing nature, much may depend upon the finer details. Multi-occupancy accommodation which has good multi-layered security arrangements incorporated from the outset, where responsible pro-active management is in place and where residents have a vested interest (further encouraged by suitable wording in tenancy agreements, where appropriate etc) in utilising the security provided can operate with minimal issues arising. Where one or more of these elements are missing, the conditions can give rise to criminal and anti-social issues to the detriment of all residents. Such locations can become problem locations attracting outsiders.
 2. At face value, there is some excellent potential. Essentially, only the Field Street communal entrance element of the proposals would abut public space. This communal entrance area would be subject to good natural surveillance from those passing by or potentially from the Paramount

Place flats directly opposite. The absence of living accommodation at ground floor level is viewed positively in terms of resident security, safety, privacy and the reduction in the potential for nuisance. Cycle storage is to be provided internally rather than being publicly accessible, thus very significantly reducing criminal opportunity in terms of cycle theft. The inclusion of a locked timber-clad bin store within the adjacent yard is noted and assuming it is suitably robust and kept locked by residents, misuse of it should be deterred.

3. It will be critical to restrict access at the communal building entrance to residents only in order to reduce criminal and anti-social opportunity within by outsiders, and to provide a safer living environment. Resident access should be provided by some form of security encrypted electronic key such as a fob etc – security encryption being vital to prevent unauthorised copying and undermining of the access control system. A suitable combined auditable access control/visitor door entry system should be incorporated in the proposals. There should be a vandal-resistant external door entry panel with a linked camera at the Field Street communal entrance provided to enable audio/visual communication between visitors held there and each individual resident within their residential unit, with remote communal door release from each unit to admit bona fide visitors. Factored in should be the ability to display the image of the caller before the call is answered, so the resident can choose whether to answer the call or not. Amongst other things, the access control system should have the facility to record and identify the location, user, type, time and date of every system event with sufficient memory storage available for a period of not less than 30 days. Images from the camera system should be stored for a minimum of 30 days also.
4. An auditable fully programmable access control visitor door entry system can enable effective management oversight of the security of a building and on occasion, help identify a security issue etc with a particular resident/tenant. Of note, the visitor door entry and access control system should avoid the incorporation of a traditional tradesperson or time-release button, as historically these have been abused and can substantially undermine building security and adversely impact residential safety.
5. It is noted that 12 post boxes are proposed within the ground floor lobby, which seems ideal and would be convenient for Royal Mail personnel. For this, Royal Mail personnel would need to be provided with restricted time-limited fob/code access rights. In terms of the post boxes, it would be ideal if TS009 security certified products were opted for. There is no indication that parcel receipt would be catered for here. Restricted access arrangements to the building for parcel delivery drivers would be worth considering. Certainly, the lobby would seem big enough to accommodate this. Individual parcel boxes would be required since parcels insecurely left can be simply stolen, provide obstacles/clutter, even be an arson risk etc. Security certified parcel boxes are also available such as those with police Secured by Design accreditation. The post (and any parcel) boxes should ideally be under CCTV surveillance camera coverage. Of course, delivery of parcels to a third-party drop point with a requirement for residents to collect parcels from there would be another option.
6. As mentioned, the inclusion of internal cycle storage (two stores on mezzanine floors serving the respective floors) is welcomed. These stores will need to be access controlled (which could form part of the communal entrance access control system), ideally be set behind a security certified doorset, and residents should be afforded the opportunity to secure their cycle in situ within the store. It is noted that a travel plan will exist with a travel information pack provided for residents including a range of cycle-related material. It is requested that a copy of the police's Secured by Design Security Advice Guide – Bike Security Tips leaflet is included as per the following link or any subsequent updated version thereof - [BIKE SECURITY LEAFLET A4 4pp nov 22.pdf \(securedbydesign.com\)](#) .
7. A well-conceived access control strategy should be coupled with robust physical security. Robust security arrangements can also help safeguard the applicant's investment in the property and reduce ongoing maintenance costs. The communal entrance doorset into the building plus other internal doorsets serving a security function/featuring access control will need to provide a robust physical barrier to unauthorised entry. It is noted that the existing communal entrance doorset is to be retained, repaired and refurbished as necessary. Ensuring it is suitably attack-resistant will need to form part of the refurbishment criteria. Blanking off the existing letterplate would be advisable to eliminate an unnecessary potential vulnerability.

8. To provide a safe and secure living environment, the individual residential unit entrance doorsets will need to provide the residents with the same level of attack-resistance as if they were front doors situated on a street. All residential unit entrance doorsets should incorporate a suitable door opening restrictor (for example, door chain/bar) and some suitable means (vision panel, fire-rated door viewer etc) whereby residents can observe who is at the door, before it is opened. These elements should part of the security doorset scope of certification. It is recommended that any internal doorsets that are access controlled/serve a security function, and residential unit entrance doorsets etc, are installed 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 PAS 24:2022). For doorsets to be appropriately certified, independent third-party certification should be in the name of the manufacturer or fabricator, not an upstream component or systems company. Independently third-party security certified doorsets are widely available and satisfy rigorous material performance standards aside from security ones. The doorsets would also need to be fit for purpose in terms of its wider performance requirements in accordance with BS6375-2:2009. The less satisfactory alternative would be to rely upon products which have no such independent third-party security certification and hence an unquantifiable and indemonstrable attack-resistance capability, which could be to the detriment of the future residents/tenants.
9. The applicant's attention is directed to the 2019 publication entitled, 'A Guide for Selecting Flat Entrance Doorsets – A publication for housing associations, landlords, building owners and local authorities in England'. This is jointly produced by the police's Secured by Design initiative, the Fire Industry Association and the Door Hardware Federation, and discusses the need for flat entrance doorsets to have relevant dual third-party certification for both fire and security. This is in the light of the fact that security and fire have equal standing where Building Regulations are concerned.
10. Extending from this principle, where there is a requirement for a doorset to be fire, smoke and security rated, e.g. apartment entrance doorsets, some doorsets aiding security compartmentation and/or to meet a building regulation requirement, 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.
11. There is tremendous potential to create secure and safe apartment accommodation as long as the applicant gives adequate attention to matters relating to designing out criminal and anti-social opportunity, and designing in community safety. To this end, the above information has been provided which could benefit the applicant (and future occupants). The police's Secured by Design Homes Guide 2024 (or any subsequent version, one is due February 2025) aims to provide best practice guidance and recommendations to the design, developer and construction sectors in relation to crime prevention and security considerations for a wide range of new build and refurbishment residential settings including apartments with communal entrances serving different numbers of units. Within that document, aside from minimum recommended physical security standards for doors serving a security function, and information on access control and visitor door entry systems, secure postal receipt options, cycle stores etc, a raft of other useful crime prevention and community safety-related, layout and physical security information is contained therein. As such it is brought to the applicant's attention in order that the applicant can ensure that pertinent elements are suitably addressed/incorporated within the proposals as they progress.
12. The inclusion of a small-scale CCTV surveillance system covering relevant external and communal internal spaces could be very beneficial for any variety of reasons, not least in providing reassurance to residents/tenants and better management oversight of the building. Should the applicant pursue this, amongst the host of guidance available within the aforementioned Homes Guide 2024, there are a couple of very useful sections included on that subject, which could be useful pointers. Any CCTV system should be supplementary to the provision of robust physical security and access control arrangements rather than attempting to compensate for inadequate provision in any of those aspects. Where CCTV is being considered, the drafting of a CCTV

Operational Requirement (OR) by the applicant at the outset would be essential to establish the remit of any CCTV surveillance camera system, what areas need to be covered and for what purpose, and to help inform system requirements with a view to ensuring the professionally designed and installed system ultimately served its intended purpose.

13. In terms of designing and installing a fit for purpose 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.
14. As the forward to the RIBA's 'Security Overlay to the RIBA Plan of Work' advises, "many security measures need consideration and integrating proactively into the design strategies as early as possible." The RIBA Security Overlay should be used to underpin proposals and be a key driver within the whole design/planning/construction process right through to site operation and resident occupancy as far as security and community safety are concerned. The intention is not to stifle creativity, but to seek to ensure that ultimately a development results that will benefit the future residents and town centre in general over the long term by minimising criminal and anti-social opportunity, and providing a safer environment. As the RIBA document identifies, security provision should be designed in as an integral part of the proposals rather than being an add-on, afterthought or needing to be provided in response to any incidents that subsequently arise. Security should be embedded from the outset and evident at this planning stage with safety/security layout vulnerabilities designed out and where opportunities to incorporate appropriate physical and technological measures are most easily accommodated and are more financially viable rather than later within the redevelopment process or retrospectively when it may be more difficult or costly to do so. Furthermore, the temptation for value engineering to be permitted at any point in the process, which might compromise security, community safety or provide unwanted criminal/anti-social opportunity in the future, should be resisted.
15. It will be essential that the converted residential block possesses robust access control and physical security arrangements amongst other things with the layout providing a safe environment that restricts criminal and anti-social opportunity. While there are no doubt certain constraints, there is also be a tremendous opportunity to provide a secure internal layout incorporating robust physical and technological security measures. A well-conceived security strategy should underpin what is proposed. The above observations, comments, recommendations and attention drawn to the Homes Guide 2024 have been provided with a view to encouraging criminal and anti-social opportunity to be designed out and community safety to be designed in, in line with national and local planning guidance, and good practice design guidance. As such, as well as contributing towards the LPA's consideration of the proposals and subsequent determination of the planning application, it is requested that this response is brought to the attention of the applicant for their due consideration.

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

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