



STAFFORDSHIRE
POLICE

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Early Intervention & Prevention Unit
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Date: 6th February 2025

Application: SMD/2024/0556

Location: Land at Newfields Farm, Rownall Road, Wetley Rocks

Proposal: Development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid

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 2024 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 135(f) of the NPPF 2024 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. Staffordshire Police acknowledge the rationale behind the proposals and have no issue with the principle of the development of a Battery Energy Storage System (BESS) with associated infrastructure and works at this location on the proviso that a suitable level of security is in place. Its close proximity to the Cellarhead National Grid site makes absolute sense.
 2. The importance of the issue of national energy security and security of supply in uncertain times internationally has attracted national news coverage. To safeguard the facility, and ensure that it is able to operate as intended without the risk of any compromise, it will be just as important that the site itself has adequate security protection. The facility will comprise high value electrical materials/equipment that might conceivably be of potential interest to well-organised, knowledgeable offenders. Solar farms, telecoms cabinets, occasionally substations etc have been targeted in the past. Not only might serious acquisitive crime offenders conceivably pose a risk to the operation of the site if they perceive it to offer sufficient financial reward (versus risk), but conceivably it could also be of interest to those with sufficient ulterior motivation, for example,

which could be ideological in nature. Factoring in layered security provision from the outset to counter such possible and varied attention is therefore advisable.

3. The general need for well-considered layered security for such sites in rural locations is further reinforced by the opportunities this might present to target the location with less likelihood for offenders to be detected or disturbed in the ordinary course of events, and longer response times should suspicious activity be detected and subsequently reported. Approach to and from this site by offenders would be most straightforward via the to-be-improved access road (which also serves as a Public Right of Way) off Rownall Road. The site would be accessed most directly through Newfields Farm with the presence of a couple of public rights of way branching off at this point noted. The site's close proximity to Newfields Farm and the fact that the most likely route to it would be via Newfields Farm are positive crime-deterrent attributes. Suspicious activity might naturally draw attention to itself. Once the site is operational, surreptitious offender vehicle approach to it would be seemingly almost impossible, which should very significantly reduce opportunity in terms of acquisitive crime. The perception, rightly or wrongly, on the part of any potential offenders of an expected level of security in association with the neighbouring National Grid site also weighs in this application site's favour. Despite these undoubtedly positive aspects associated with the location of the site, it would be imprudent to rely upon them entirely.
4. The Transport and Access Statement includes the briefest section entitled 'Security' with some basic information on the proposals – "The BESS development would be closed to the public throughout the construction, operation and decommissioning through use of security fencing and CCTV". Elsewhere within the submission documentation, reference is made to 2.4m high palisade and welded mesh fencing and gating plus some acoustic fencing. Whether the perimeter fencing would have any independent third-party security certification is unknown. Where installed, such fencing and gating provides a proven and demonstrable level of penetration attack-resistance (a graded scale of a certain number of minutes protection when attacked with different sets of attack tools), and consequently, is something the applicant is encouraged to explore. The relevant security standard would be LPS1175 Issue 8. Of potential interest to the applicant, Secured by Design member perimeter security companies have a vast wealth of general experience and knowledge in manufacturing security certified fencing/gating and would be very well placed to provide some valuable and site-specific advice. Regardless of whether the fencing is security certified or not, it would need to be manufactured and installed in accordance with the relevant part of BS 1722.
5. Climb-resistance is not factored in to the LPS1175 standard. Alas, in general terms, gating very often contains inherent design vulnerabilities (for example, built-in external climbing aids often in connection with the locking area, smooth gate tops or the ability to crawl underneath). The fencing/gate drawing suggests two of these could apply in relation to the welded mesh gates. This would need to be considered as part of discussions with fencing manufacturers/contractors with a view to designing out such potential security weaknesses. For example, could the gates have a climb-deterrent top added?
6. How the gates themselves would be secured is unknown, but the choice of locking mechanism would need to be such that it offered a high (ideally independently security certified) level of attack resistance to add to the time delay. Should a padlock be used, opting for one certified to BS EN 12320 and at a high grade could be advisable. Factoring in some further protection for this/these, such as metal protection shrouds (if they can be accommodated) might be worth considering.
7. Aside from the fact that CCTV cameras would be included, which according to a drawing would be pole-mounted, nothing is known about the proposals. It is worth commenting that the deterrent value and effectiveness of a record-only CCTV system is potentially vastly different to one that is remotely-monitored at a suitably accredited Remote Video Receiving Centre. Remotely monitored CCTV cameras can be a very effective way of protecting vulnerable sites subject to intrusion, damage, theft etc, offering a powerful deterrent initially (warning signage helps in this regard), enabling live images to be viewed, suspicious activity to be detected at an early stage (the earlier the better) via some suitable detector-activated arrangement, ongoing assessments of suspicious activity/incidents made, audible challenges issued (where a public address system allows – something that can be highly effective), and real-time intervention initiated, as necessary. In effect, a well-designed remotely monitored CCTV surveillance camera system could

deny potential offenders the time to act with impunity. It is recommended that it is this form of remotely-monitored CCTV provision that is used to protect the site. The incorporation of some public address challenge facility reinforces the deterrent value of remote CCTV monitoring arrangement, to dispel any doubt on the part of offenders that they can operate with impunity.

8. One would expect that site lighting would be provided and operate on an as and when required basis only, should hours of darkness maintenance visits etc be required. Were that the case, the ability for CCTV operators to be able to turn on the external lighting remotely could prompt potential offenders to flee and might also be worth factoring in. It is presumed that infra-red lighting might separately accompany the CCTV cameras.
9. Mindful of the fact that this higher ground locally can be a very foggy area at certain times of the year, also worth factoring into deliberations would be potential benefits that cameras which included thermal imaging capabilities could provide compared with the limitations of standard day/night cameras.
10. Any remotely monitored detector activated CCTV system would need to be installed in accordance with BS8418:2015 - Installation and remote monitoring of detector operated CCTV systems – Code of Practice with 24-hour monitoring undertaken at a suitably accredited Remote Video Receiving Centre (RVRC).
11. Regarding the design and installation of CCTV systems, standard police advice would be to opt for professional companies which have either relevant National Security Inspectorate (NSI) or Security Systems and Alarms Inspection Board (SSAIB) accreditation CCTV systems.
12. Where Level 1 (immediate) police attendance is required in response to activations of a security system including a detector-activated CCTV system, 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), available online.
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 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 system designer/installer to account should the designed/installed system fail to meet any requirements that have been laid down. Ultimately the drafting of a site-specific well-drafted OR and its fulfilment with a suitable system will be a matter for and between the two parties involved.
14. Thorough walk-tests undertaken by end users as part of any commissioning process can be very important and help identify blind spots, inadequate coverage, image quality issues etc that need to be addressed before sign off. Given the location, it would be advisable for such walk tests to be undertaken under a variety of weather and lighting conditions. A suitable maintenance regime/contract can ensure any CCTV system continues to operate to optimum efficiency, that live/recorded image quality can be maintained, and any shortcomings identified and can be rectified in a timely manner. Retaining system images for each camera captured at the point of installation as a benchmark against which future images could be compared to enable the identification of any deterioration over time might be useful.
15. The applicant is further directed to the website of the National Protective Security Authority, which is a tremendous resource in terms of advice and guidance to implement effective protective security measures for a site, notably under the sections 'Protective Security' and 'Advice and Guidance'.

16. The albeit brief 'security' section within the Transport and Access Statement is welcomed and suggests some attention has been given to this issue. It is acknowledged there may be a need for some circumspection about putting in the public domain certain aspects of proposed security arrangements. It is to be hoped and would be a recommendation that the applicant ensures they have an overarching security strategy for this site to guide decision-making. The above comments, observations and recommendations have been provided with the intention of aiding the applicant in that regard.
17. Security at the construction stage can be easily overlooked. That stage would expose the site to potentially a wider number of offenders. Both opportunistic and more organised offenders could seek to exploit any security weaknesses they identify, which could result in significant losses in terms of materials (such as cabling), tools, equipment and machinery. In this regard, the applicant and their contractors are directed to the advice note below.

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. 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)'