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Our Ref: **29.04.25 (017.25.SM)**
Your Ref: SMD/2025/0185
Date: 29th of April 2025

Dear Sir,

Ref: SMD/2025/0185
Proposal: Erection Change of use and alteration of agricultural building to form veterinary surgery
Location: Thornfields Farm , Leek Road , Moorville , Cellarhead , Staffordshire , ST3 5BE

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.

Whilst I have no objections to this application, it is important that I take this opportunity to provide the following guidance and recommendations aimed at reducing opportunities for crime and ensuring that a high level of physical security is incorporated in this development.

I recommend that this building is protected by a Monitored Alarm System as a condition of this application.

Consideration should be given to a CCTV system or including the proposed building and parking in the site CCTV system. Please consider the following guidance.

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";
- 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";
- 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;

- **(Where these proposals require a Design And Access Statement to accompany the application)** The 2006 CABE 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. **Development Design Concerns and Issues.**

It is important that a high level of physical security is incorporated in the construction of this proposal, and that it conforms to the minimum standard of security outlined within these recommendations.

1.1 **Alarm Systems.**

I recommend that this building is protected by a Monitored Alarm System as a condition of this application.

Please take the following guidance into account.

Section 54. Intruder and hold-up alarm systems.

Section 54.1 Intruder and hold-up alarm systems shall meet the requirements of BS EN 50131 (Intrusion and hold-up systems) and EN 50136 (Alarm transmission systems and equipment). All installations shall be in accordance with the current electrical regulations.

Section 54.2 If an immediate police response is required then installers must meet the requirements of the National Police Chiefs' Council (NPCC) policy document – Guidelines on Police Requirements & Response to Security Systems are available at: www.policesecuritysystems.com/national-police-chiefs-council-security-systems-policy www.policesecuritysystems.com/secured-by-design-alarm-standard

Section 54.3 Specifiers should be aware that a Secured by Design Alarm Standard exists for intruder and hold-up alarm installations. Its creation is due to our work with the national alarm inspectorate bodies and trade organisations with the aim of improving the performance of security systems and increasing the preventative impact and detection rate emanating from them. Whilst meeting the requirements of the Secured by Design Alarm Standard is not necessary, details of it should be shared with those charged with responsibilities in this sector. Further information is available at: www.policesecuritysystems.com/secured-by-design-alarm-standard/sbd-technical-guide

1.2 **Proposed boundaries (Secured By Design Guidance).**

Where the intention is to install additional boundaries or gates, I recommend that these areas are secured using the following guidance.

Secured By Design. Non-Residential Guide (2025).

Section 75. Perimeter and external areas. Boundary types.

Section 75.2 When boundaries are protected by fences, gates or barriers they should be certified to one of the following minimum standards:

- LPS 1175 Issue 8 Security Rating B3, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- Sold Secure SS323 Silver, or
- LPS 1673 Issue 1 Attack Rating AR.A180

1.3 External lighting (Recommended minimum guidance where additional lighting is proposed.)

The entire site should be illuminated, with higher lighting levels provided for vulnerable areas (vehicle parking, any vehicle charging points, any cycle racks, any externally stored machinery and vehicles left over night).

Note: This is of greater importance during the winter months and where lighting is intended to support CCTV.

Section 99. External lighting.

Section 99.1 The need for lighting will be determined by local circumstances. For example, in an inner city environment the lighting of a footpath is generally only effective in reducing crime levels if it is matched with a high degree of natural surveillance from surrounding buildings, where reaction to an identified incident can be expected. The lighting of an isolated and little used footpath may give the user a false sense of security and shall be avoided. If there is a history of crime along an existing footpath, or where the additional connectivity due to the development could attract criminal or anti-social behaviour, consideration shall be given to closing the path at night rather than lighting it. It is accepted that this would only be an option in exceptional circumstances.

Section 99.2 In terms of security, the objective of lighting non-residential units after dark is to deter or detect an intruder.

Section 99.3 Lighting design shall be co-ordinated with a video surveillance system (when specified) and the landscape designed to avoid any conflicts and to ensure that the lighting is sufficient to support a VSS. Light fittings shall be protected where vulnerable to vandalism.

Section 99.4 A lighting scheme shall provide uniformed lighting levels with good colour rendition and be sufficient to cater for lawful after dark activity around the industrial or warehouse unit and site. It shall not cause glare or light pollution and shall support both formal and informal surveillance of the site.

Section 99.5 External illumination when the building is unoccupied is recommended for entrance gates and routes to the main entrance and doors, car parks (if occupied by vehicles) and observable building elevations.

Section 99.6 Bollard lighting is purely for wayfinding and can be easily obscured as it does not project sufficient light at an appropriate height which makes it difficult to recognise facial features and can increase the fear of crime.

1.4 CCTV. (Recommended Minimum Guidance).

Consideration should be given to a CCTV system or including the proposed building and parking in the site CCTV system. Please consider the following guidance.

Secured By Design Commercial Development (2023).

Section 35 Closed circuit television (CCTV).

Section 35.1 (As part of a Security Plan and Security Management) Although CCTV is not a solution to all security problems it can help deter criminals and assist with the identification of offenders after a crime has been committed. If a CCTV system has a recording facility only, it can be a useful investigate tool whereas a monitored system allows a real-time reaction to criminal activity. CCTV is also often very useful in mitigating against risk where other forms of security are not feasible.

Section 35.2 (Need for an operational requirement) It is important that an operational requirement for CCTV is drawn up for commercial premises in accordance with their specific use and that the objectives for the CCTV system are clearly established before a tendering process is started.

Section 35.3 (Need to make recording available) The CCTV system must have a recording format that is acceptable to the police with images of evidential quality. Staff should be sufficiently trained to operate the system and be able to make recordings available to police on request and an operational requirement must take account of this fact.

Section 35.4 (Matters to discuss with CCTV installer) Whilst the location of cameras is a site-specific matter it would be normal practice for the system to observe all vehicular and pedestrian entrances. Early discussions with an independent expert and potential installers can resolve a number of matters including:

- monitoring and recording requirements
- activation in association with the intruder alarm
- requirements for observation and facial recognition/identification
- areas to be monitored and field of view
- activities to be monitored
- the use of recorded images
- maintenance of equipment and the management of recording
- subsequent ongoing training of operatives

Section 35.5 (Minimum required installation standards) CCTV systems must be installed to BS EN 50132-7: **CCTV surveillance systems for use in security applications.**

Section 35.6 (Lighting must support CCTV Scheme) The CCTV system should be compatible with the existing or planned lighting system and landscaping proposals.

Section 35.7 (Vandal resistant housings) In high crime areas CCTV installations should be protected with vandal-resistant housings.

Section 35.8 (Data Protection, Human Rights and Information Commissioners registration) CCTV systems should be registered with the Information Commissioner's Office (ICO) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available at this website: www.ico.org.uk

Section 35.9 (GDPR Requirements) Specifiers are reminded that there will be a requirement for a data controller to ensure compliance with the GDPR. The data controller must ensure that all CCTV images that can be used to identify individuals are used, stored and disclosed in line with the GDPR principles.

Section 35.10 (CCTV Management and Operation Code of Practice and Best Practice in relation to use of data as evidence) For guidance on the use of CCTV images as legal evidence, see BS 7958:2015 **Closed circuit television (CCTV). Management and operation. Code of practice.** This document provides guidance and recommendations for the operation and management of CCTV within a controlled environment where data that may be offered as evidence is received, stored, reviewed or analysed. It assists owners of CCTV systems to follow best practice when gathering information of evidential quality. Remotely monitored detector activated CCTV systems must be installed in accordance with BS 8418:2021 **Design, Installation, Commissioning and Maintenance of Detection-Activated Video Surveillance Systems (VSS). Code of practice.**

Section 35.11 (Surveillance Camera Code of Practice) The Biometrics and Surveillance Camera Commissioner has updated the Surveillance Camera Code of Practice which is available at: www.gov.uk/government/publications/update-to-surveillance-camera-code

Section 35.13 (Recommended standard for surveillance camera industry) The recommended standards for the surveillance camera industry can be found at: www.gov.uk/guidance/recommended-standards-for-the-cctv-industry

1.5 Building Shell (roof and wall construction).

Section 19. Roof design and lightweight wall construction.

Roof construction.

Section 19.1 Roofs are potentially vulnerable to criminal intrusion and damage through vandalism, if criminals gain access to them and therefore careful consideration must be given to their construction.

Section 19.2 Roofing systems shall be certified to one of the following minimum standards, or above:

- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60

Section 19.3 Roofing systems must be installed using the manufacturers approved fixing system that they were tested with.

Section 19.4 Where traditional roof installations (*Note 19.4*) are used that cannot meet the above requirements, additional security measures, such as a monitored intruder and hold-up alarm system to protect a vulnerable ceiling void, may be required by the DOCO to mitigate against criminal acts. For further information about intruder and hold-up alarm systems see Section 54.

Roof access and aids to climbing.

Section 19.5 Unauthorised access to roofs can make a range of crimes from burglary to arson easier to commit. Some buildings have a common roof covering that extends across different rooms, areas or even occupying businesses; therefore from a single breach point all of these spaces are potentially at risk from intruders.

Section 19.6 External rainwater pipes can be used for climbing and shall be specified as square or rectangular in section, be fitted flush against walls or within wall cavities or covered recesses.

Pipes shall be made of fire-resistant material with bends and horizontal runs kept to a minimum; existing roofs can be fitted with an appropriate obstructive barrier to prevent access.

Section 19.9 Designers shall take care not to inadvertently create climbing aids to upper windows and flat roofs via structures such as boundary walls, living walls, other adjacent buildings, handrails or external staircases. It is advised that care is taken to design a means of routine or emergency escape that will avoid the installation or deployment of external staircases.

Roof windows, roof lights and roof lanterns.

Section 19.10 The security requirements for easily accessible roof lights and roof windows differ depending on the crime risk.

Low crime risks require roof windows, roof lights and roof lanterns to be certified to one of the following minimum standards, or above:

- PAS 24:2022+A1:2024*, or
- STS 204 (certified to PAS 24:2022+A1:2024, or
- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60

The following standard will be dependent upon the value of proposed contents.

High crime risks require roof windows, roof lights and roof lanterns to be certified to one of the following minimum standards, or above:

- PAS 24:2022+A1:2024*, or
- STS 204 (certified to PAS 24:2022+A1:2024*), or
- LPS 2081 Issue 1 Security Rating B, or
- STS 222 Issue 4 Burglar Resistance BR2(S), or
- LPS 1175 Issue 8 Security Rating A3, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- LPS 1673 Issue 1 Attack Rating AR.A180

Section 19.11 Alternatively, an easily accessible roof light or roof window that does not meet the above requirements must be protected with an internal grille certified to one of the following minimum standards, or above (listed here alphanumerically):

- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60

Section 19.13 Roof windows, roof lights and roof lanterns must be fitted in accordance with the manufacturer's specifications or, in accordance with BS 8213-4:2016.

Lightweight wall construction.

Lightweight walls and metal clad walls must be lined internally with brick or blockwork to a height of 2m.

Section 19.15 Where lightweight wall construction is being considered and a crime risk analysis identifies that such a construction may be vulnerable to an attack, the use of insulated sheet cladding and a reinforced lining such as welded steel mesh can enhance the security of the building fabric.

Section 19.16 Lightweight wall systems shall be installed by approved contractors, in compliance with the manufacturer's instructions and shall be certified to one of the following minimum standards, or above (listed here alphanumerically):

- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60

1.6 Doors (including emergency escape doors and outward opening doors).

Interior doors (where increased security to offices and store rooms is required).

Section 51. Secure internal doorsets.

Section 51.1 Specifiers shall contact the DOCO if there are any internal doorsets that may require additional security e.g. computer server room. The security standards applicable will vary dependent upon the risk but secure internal doorsets shall be certified to one of the following minimum standards, or above:

- LPS 2081 Issue 1 Security Rating A+, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1+, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60+

High crime risk doorsets.

Section 51.2 High crime risk doorsets shall be certified to one of the following minimum standards, or above:

- LPS 2081 Issue 1 Security Rating B+, or
- STS 222 Issue 4 Burglar Resistance BR2(S), or
- LPS 1175 Issue 8 Security Rating A3+, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- LPS 1673 Issue 1 Attack Rating AR.A180+

Minimum recommended security standards for external doorsets.

Section 22. External doorsets.

Section 22.1 External doorsets shall be certified to one of the following minimum standards, or above:

- PAS 24:2022+A1:2024*, or
- STS 201 (certified to PAS 24:2022+A1:2024*), or
- LPS 2081 Issue 1 Security Rating B+, or
- STS 222 Issue 4 Burglar Resistance BR2(S), or
- LPS 1175 Issue 8 Security Rating A3+, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- LPS 1673 Issue 1 Attack Rating AR.A180+

Required material standard.

Section 22.9 All doorset configurations (inward, outward, sliding, pivot) must form part of the manufacturer's certified product range.

Section 22.10 Doorsets must also be fit for purpose and certified to the relevant material standard:

- BS EN 14351-1:2006+A2:2016
- BS EN 14351-2:2018
- BS EN 16034:2014
- BS 8214:2016
- BS 644:2012 (Timber)
- BS 4873:2016 (Aluminium)
- BS 6510:2010 (Steel)
- BS 7412:2024 (PVCu)
- BS 8529:2017 (Composite)

Emergency escape doorsets.

Emergency escape doorsets should have no external furniture.

Section 25.6 In addition to the above requirements, doorsets designated as 'emergency' or 'panic' exits must be fitted with the hardware appropriate to the specific use:

- BS EN 179:2008 (Emergency exit devices)
- BS EN 1125:2008 (Panic exit devices)
- BS EN 13637:2015 (Electronically controlled exit systems)

1.7 Windows (minimum recommended standards for glazing).

Please note, that chamfering window sills will help to reduce opportunities for climbing.

Security Glazing (minimum security requirements).

Section 27. Security glazing.

Section 27.1 All ground floor and easily accessible (*Note 27.1*) glazing must incorporate one pane of laminated glass or glass tested to BS EN 356:2000 (Glass in building. Security glazing. Testing and classification of resistance against manual attack) to category P1A, or above, unless it is protected by a roller shutter or grille that meets the security standards within Section 39.

Note 27.1a: Easily accessible is defined as: A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or An access balcony, or a window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

Section 27.2 Occasionally, when large laminated glazed panels are used on south facing elevations, there have been incidents of glazing failure (cracking) due to thermal stress. Whilst the use of toughened glass would seem to be a simple solution to the problem of thermal stress, ordinary toughened glass offers no security resistance. It is therefore recommended that the inner pane of glass used in a double glazed unit is 'laminated toughened'. This combination of the two sheets of toughened glass and the interlayer offers both resistance to intrusion and thermal stress associated with large glazed areas. Specifiers are reminded that the minimum requirement for SBD is BS EN 356:2000 P1A.

Windows.

Section 28. Windows.

Note: Additional security may be gained by utilising additional protection such as a certified roller shutter or grille, or through the use of a doorset certified to higher security

Section 28.1 All easily accessible (*Note 28.1*) windows shall be certified to one of the following minimum standards, or above):

- PAS 24:2022+A1:2024*, or
- STS 204 (certified to PAS 24:2022+A1:2024, or
- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60

Section 28.9 All glazing in windows that are easily accessible (*Note 28.1*) must include one pane of laminated glass certified to BS EN 356:2000 Class P1A, or above, securely fixed in accordance with the manufacturer's instructions.

Section 28.10 Windows must also be fit for purpose and certified to the relevant material standard:

- BS EN 14351-1:2006+A2:2016
- BS EN 16034:2014
- BS 644:2012 (Timber)
- BS 4873:2016 (Aluminium)

1.8 Roller Shutters and Grilles. (Recommended Minimum Guidance).

Section 39 Roller shutters and grilles.

The following standards are the minimum requirements for Roller Shutters in this location.

Section 39.1 Roller shutters and grilles can provide additional protection to both internal and external doors and windows. They shall be certified to one of the following minimum standards, or above:

- LPS 2081 Issue 1 Security Rating A+, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1+, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60+

Section 39.2 In new build developments roller shutters shall be integrated into the fabric of the building. The above minimum security ratings are generally sufficient where:

- a roller shutter or grille is required to prevent minor criminal damage and glass breakage
- the roller shutter or grille is alarmed and the building is located within a secure development with access control and security patrols
- the roller shutter or grille is intended to prevent access into a recess
- the door or window to be protected is of a high security standard in it's own right

Section 39.3 Security ratings higher than the minimum may be required and will be dictated by one or more of the following security considerations:

- Type of crime risk
- Level of crime risk
- Location of the building
- Security level of the door or window being protected

In the event of an emergency, it must be possible to secure electrically operated roller shutters and grilles quickly from a safe location within the premises. For example, the ability to operate a closing mechanism for shop front roller shutters from a safe area at the rear of the premises.

1.9 Interior Walls (offices, and store areas etc.).

High impact resistant gypsum boards should be used to strengthen stud partition walls where rooms may require increased security due to their proposed use and contents.

Where considered necessary, reinforcing the wall lining with welded steel mesh can enhance security.

Secured By Design. Commercial Development (2023).

Section 57. Physical security standards for computers and server rooms.

Section 57.1 Consideration must be given to the structure of the internal walls, floors and ceilings of computer server rooms to provide appropriate security and to prevent damage by fire, smoke or from fire fighting (water) from other parts of the building. Due to varying construction methods and materials it is not possible to be prescriptive, however combinations of different materials, such as high impact gypsum boards, expanded metal sheets, plywood, and masonry have proved to be effective.

Section 57.2 Where it is impractical to secure a room housing a computer server, there are two alternative solutions i.e. secure cabinets for individual computers, or small server units, and security caging for large or multiple servers. In both cases the SBD requirement is for full product certification to one of the following minimum standards, or above:

- LPS 1175 Issue 8 Security Rating B3+, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- Sold Secure SS314 Gold

1.10 Toilet Facilities.

Note: Badly designed and located toilets can offer opportunities for bullying, assault, arson and generally poor or anti-social behaviour.

Secured by design guidance.

Secured by Design recommends full ceiling to floor enclosures for cubicles to provide increased privacy and recommends that urinals are not specified. Hand washing facilities should be located where they benefit from maximum passive surveillance.

1.11 Changing Rooms or Staff Locker Rooms.

Note: Staff rooms and offices should provide each member of staff with secure storage for clothing and personal belongings. Lockers should be certificated to LPS 1175 SR 1 or WCL 5.

2. **Further Information.**

Please note that relevant help and information may be gained from the following web sites:

- www.securedbydesign.com
(The official Police Security Initiative and Police Preferred Specified security product scheme).
- www.gov.uk/data-protection
(Online notification of CCTV schemes, Data Protection Principles and relevant Codes Of Practice).
- www.bsi-global.com
(Standards, Training, Testing, Assessment and Certification).
- www.bregroup.com
(Offer quality of performance and protection certification for fire, security and environmental products and services).
- www.nsi.org.uk
(Independent UKAS-accredited certification body in the security and fire sector).
- www.ico.gov.uk
(Independent authority upholding information rights in the public interest and data privacy for individuals).

The Secured by Design Website (www.securedbydesign.com) provides valuable information regarding police and home office recognised standards and licensed component manufacturers.

Crime prevention design advice is given free without the intention of creating a contract. The Police Service and the Home Office does not take any legal responsibility for the advice given. However, if the advice is implemented, it will reduce the opportunity for crimes to be committed.

Yours sincerely,

D. Fisher (B.Sc. Hon's)
Architectural Liaison Officer.
(Designing Out Crime Officer.)