



STAFFORDSHIRE
POLICE

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Our Ref: **09.12.25 (191.25.SM)**
Your Ref: SMD/2025/0473
Date: 9th of December 2025

Dear Arne,

Ref: SMD/2025/0473
Proposal: The reuse and adaptation of a group of historic buildings located on the former Jackson's Nursery site, Tunstall Road, Knypersley. The site is now occupied by Roaches School, an independent co-educational special school for pupils aged 5 to 16 with social, emotional and mental
Location: The Cottage Tunstall Road, Biddulph

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.

I recommend that video surveillance and a monitored alarm be conditions of this application.

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 Video surveillance systems. (Recommended Minimum Guidance).

I recommend that a Video Surveillance System be a condition of this application. Where possible, this should be monitored by a dedicated monitoring company. Consideration should be given to joint Video Surveillance and Alarm System monitoring.

Please take the following guidance and links into account as appropriate.

Note: As this is a listed building, it may be necessary to provide pole mounted cameras within the grounds.

Video Surveillance Systems.

Secured By Design. Non-residential guide. (2025). Section 35.

Section 35.1 (Usefulness of Recording only systems and monitored systems)

Although video surveillance systems (VSS) are 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 VSS has a recording facility only, it can be a useful investigative tool whereas a monitored system allows a real-time reaction to criminal activity. Video surveillance systems are 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 VSS is drawn up for non-residential premises in accordance with their specific use and that the objectives for the VSS are clearly established before a tendering process is started.

Section 35.3 (Need to make recordings available) The VSS must record at a minimum of 25 frames per second to allow security staff to actively watch, monitor and review events easily. Staff shall 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 (Requirement to store images for a minimum of 30 days) Ideally, VSS should be monitored live 24/7, giving the ability to react to a situation as it occurs. However, most VSS are designed for recording images and for the post event investigation only, in which case nobody is required to monitor the activities live. Images should be stored for as long as is necessary, but the system should have the capacity to store images for at least 30 days.

Section 35.5 (Matters to discuss with 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, as a minimum. 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 35.6 (Minimum required installation standards) Video surveillance systems must be installed to BS EN 62676 (*Video surveillance systems for use in security applications*).

Section 35.7 (Lighting and landscaping must support the system) The VSS shall be compatible with the existing or planned lighting system and landscaping proposals.

Section 35.8 (Potential need for vandal resistant housings) In high crime areas, or when advised by the DOCO, VSS installations shall be protected with vandal-resistant housings.

Section 35.9 (Requirement to register a system with the information commissioner and to be compliant with Data Protection and Human Rights legislation) Video surveillance systems shall 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:

<https://www.ico.org.uk>

Section 35.10 (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 VSS images that can be used to identify individuals are used, stored and disclosed in line with the GDPR principles.

Section 35.11 (Video Surveillance Systems Management and Operation, Code of Practice and Best Practice) For guidance on the use of video surveillance 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 video surveillance systems within a controlled environment where data that may be offered as evidence is received, stored, reviewed or analysed. It assists owners of video surveillance systems to follow best practice when gathering information of evidential quality. Remotely monitored detector activated VSS 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 35.12 (The 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 (The passport to compliance) In addition, the passport to compliance, which is aimed at large public-space surveillance camera systems such as town centre schemes operated by local authorities is available at:

www.gov.uk/government/collections/surveillance-camera-guidance-tools-and-templates.

Section 35.14 (Surveillance industry recommended standards) The recommended standards for the surveillance camera industry can be found at:

www.gov.uk/guidance/recommended-standards-for-the-cctv-industry

1.2 Alarm Systems.

I recommend that the proposed buildings are protected by a Monitored Alarm System.

Consideration should be given to joint monitoring of Video Surveillance and Alarm Systems.

Intruder and hold-up alarm systems.

Secured By Design. Non-residential (2025). Section 54.

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

1.3 External lighting.

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

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

External lighting.

Secured By Design. Non-residential guide. (2025). Section 99.

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 Secure internal doors.

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

Secure internal doorsets.

Secured By Design. Non-residential guide. (2025). Section 51.

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+

1.6 Toilet Facilities (design guidance).

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.

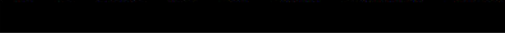
1.7 Changing Rooms or Staff Locker Rooms (design guidance).

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).

If I can be of any further assistance, please do not hesitate to contact me on


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,



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