



**STAFFORDSHIRE
POLICE**

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Our Ref: **09.12.25 (196.25.SM)**
Your Ref: SMD/20205/0480
Date: 9th of December 2025

Dear Ben,

Ref: SMD/2025/0480
Proposal: Application for Lawful Development Certificate for a Proposed Change of Use from Class C3(a) to a residential home for up to 2 young people aged between 3 and 17 who would be cared for by up to 4 adult carers
Location: The Woodlands , Foxt Road , Foxt , Staffordshire , ST10 2HJ

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.

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.

Should planning permission be granted, I recommend that the proposed care home is registered with Ofsted as a condition of this application.

Please take the following guidance into consideration.

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";
- 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."

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.

1. Development concerns.

1.1 'Children Missing from Home and Care' and registration with Ofsted.

There are standard requirements on the part of care home operators to adhere to the 'Children Missing from Home and Care' Joint Protocol between Staffordshire and Stoke-on-Trent Local Authorities & Staffordshire Police.

Children's Care Homes need to be registered with Ofsted who are the appropriate regulatory authority and subsequently be overseen by them to ensure that all the necessary checks and balances are in place to ensure the efficient running and management of the home, and to ensure that quality of care is being provided for the benefit of the children who would be placed there.

I recommend that the proposed care home is registered with Ofsted as a condition of this application.

1.2 Missing policy.

The onsite staff should all be aware of their missing policy and procedures. The difference between absent and missing should be clearly defined in the policy, as well as when the police should be called.

1.3 Philomena Policy.

Where planning is granted for these proposals, Staffordshire Police recommends the use of the Philomena Policy. This policy requires management to complete a form for each child resident detailing key information including a photo. This policy is stored locally by the care home management team. In the event of a child going missing, the management team can hand this information to the visiting officers to help with searches.

1.4 Conflict with neighbouring uses.

There has recently been an increasing number of applications for smaller care homes for children and smaller HMO's. Where this Care Home is to be located adjacent to an existing HMO, there may be a potential risk to vulnerable children being located adjacent to a dwelling occupied by adults with an uncertain history and background.

1.5 Video surveillance.

I recommend that Video Surveillance is installed to cover the plot access and egress points.

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 35.3 (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.

Please note that the need to register a system should only apply to larger (3 or more cameras) systems.

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.

2. Crime reduction guidance and links.

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 **doco@staffordshire.pnn.police.uk**.

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)
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(Designing Out Crime Officer.