



STAFFORDSHIRE
POLICE

Reuben Berriman
Planning Support, Customer Services.
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire Moorlands
ST13 6HQ

Duncan Fisher
Architectural Liaison Officer
(Designing Out Crime Officer)
Early Intervention And Prevention Unit.
Lichfield Police Office
Eastern Avenue
Lichfield
WS13 7EL

doco@staffordshire.pnn.police.uk

Our Ref: **15.12.25 (199.25.SM)**
Your Ref: **CON/2025/0044**
Date: **15th of December 2025**

Dear Reuben,

Ref: CON/20205/0044
Proposal: Consultation from SCC for an Application to Add two Public Footpaths Both Commencing at the Same Location along Tenford Lane and Terminating at Two Different Locations along Gorsty Hill Road
Location: Footpath along , Tenford Lane to Gorsty Hill Road , Tean , Staffordshire

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.

As there is a direct link between permeability and increase in crime, please consider the following guidance in relation to residential development and these footpaths.

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 guidance.

1.1 Layout of roads and footpaths.

Wherever possible, natural surveillance from the front of dwellings over pedestrian routes and Public Open Space must be promoted.

I recommend that pedestrian links be limited to as few as possible (taking the proposed number of Dwellings into account) and that they run alongside vehicle routes. There is a direct link between permeability and increase in crime.

Secured by Design. Residential Guide. 2025. Section 8. Roads and footpaths.

Through-roads and cul-de-sacs.

Section 8.4 There are advantages in some road layout patterns over others especially where the pattern frustrates the searching behaviour of the criminal and their need to escape. Whilst it is accepted that through routes will be included within development layouts, *the designer must ensure that the security of the development is not compromised by excessive permeability, for instance by allowing the criminal legitimate access to the rear or side boundaries of dwellings, or by providing too many or unnecessary segregated footpaths (Note 8.4).* Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity are desirable as they have both been proven to deter criminal behaviour.

Note 8.4: *The Design Council's/CABE's Case Study 6 of 2012 states that: "Permeability can be achieved in a scheme without creating separate movement routes" and notes that "paths and pavements that run as part of the street to the front of dwellings reinforce movement in the right places to keep streets animated and do not open up rear access to properties."*

Section 8.5 A review of available research in this area concluded that: *"Neighbourhood permeability... is one of the community level design features most reliably linked to crime rates*, and the connections operate consistently in the same direction across studies: *more permeability, more crime*. Several studies across several decades link neighbourhood property crime rates with permeability versus inaccessibility of neighbourhood layout. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates..."

Source: *Taylor R B 2002 "Crime Prevention Through Environmental Design (CPTED): Yes, No, Maybe, Unknowable, and all of the above" in Bechtel RB (ed) "Handbook of Environmental Psychology", John Wiley, New York, Pages 413 – 426. Cited by Professor Ted Kitchen Sheffield Hallam University 2007.*

Section 8.6 Cul-de-sacs that are short in length and not linked by footpaths can be very safe environments in which residents benefit from lower crime.

Section 8.7 However, research shows that the benefit of a cul-de-sac can be compromised if one or more of the following undesirable features exists:

- backing onto open land, railway lines, canal towpaths, etc.
- are very deep (long)
- *linked to one another by footpaths (leaky cul-de-sacs)*
- poorly lit

Section 8.8 Cul-de-sacs that connect by footpaths to other parts of a development, often referred to as '*leaky cul-de-sacs*', experience the highest levels of crime when compared to crime levels within a true cul-de-sac. *Crime in this kind of design can be 110% higher than crime in a true cul-de-sac and therefore should be avoided.*

Source: Professor Rachel Armitage, "*Crime Prevention Through Housing Design*" 2013, Part 2, Chapter 6, "*The Impact of Road Layout on Levels of Crime and Fear of Crime.*"

Section 8.1 Vehicular and pedestrian routes shall be designed to ensure that they are visually open, direct, well-used and shall not undermine the defensible space of neighbourhoods. Design features can help to identify the acceptable routes through a development, thereby encouraging their use, and in doing so enhance the feeling of safety. Where it is desirable to limit access/use to residents and their legitimate visitors, features such as rumble strips, change of road surface (by colour or texture), pillars, brick piers or narrowing of the carriageway may be used. This helps to define the defensible space, psychologically giving the impression that the area beyond is private.

Section 8.2 It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that designing out crime is adopted as a broader package of works. This includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda.

Active Travel England.

Section 8.3 Active Travel England, is an executive agency, sponsored by the Department for Transport. They are:

- investing in and improving standards for active travel schemes across England
- integrating active travel in the planning and development system
- focusing on inclusivity and accessibility and giving people from all walks of life the opportunity to try active travel
- helping councils to access state of the art data and analysis to use in active travel planning and design

Further information is available at: Gov UK – Active Travel England - Planning Active Places: **Active Travel England**

Wherever possible pedestrian routes should run alongside vehicle routes and be limited to as few as possible.

Footpath and bicycle route design.

Section 8.9 Routes for pedestrians, cyclists and vehicles shall be integrated and assist easy, intuitive wayfinding through the application of inclusive design by increasing activity and therefore natural surveillance, proven deterrents for crime and anti-social behaviour.

Section 8.10 Paragraph 96b of the NPPF (December 2024) states that 'planning policies and decisions should aim to achieve 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 – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continued use of public areas.'

Section 8.11 Public footpaths should not run to the rear of, and provide access to, gardens, rear yards or dwellings as these have been proven to generate crime. Where developments have to incorporate existing public rights of way, early consultation with the DOCO is required to ensure that the appropriate mitigating action is taken to reduce criminal opportunity.

Section 8.12 Where a segregated footpath is unavoidable, for example where there is a public right of way, an ancient field path or heritage route, designers shall make the footpath a focus of the development by ensuring it is a safe space and accessible for all, in support of the **National Police Chiefs' Council's Policing Violence Against Women and Girls - The National Framework for Delivery: 2024 – 2027**. A segregated footpath should be:

- *as straight as possible*
- *wide*
- *well-lit (see paragraphs 8.21 to 8.23)*
- *devoid of potential hiding places*
- *overlooked by surrounding buildings and activities*
- *carefully landscaped (see paragraphs 8.16 to 8.20)*
- *well-maintained so as to enable natural surveillance along the path and its borders*

Section 8.13 *Physical barriers may also have to be put in place where 'desire' lines (unsanctioned direct routes) place users in danger, such as at busy road junctions. It is important that the user has good visibility along the route of the footpath.*

Section 8.14 Where isolated footpaths are unavoidable, and where space permits, they shall be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, bicycles and mobility vehicles). If footpaths are designated as an emergency access route they must be wide enough to allow the passage of emergency and service vehicles and have lockable barriers.

Planting next to a footpath.

Please consider the following guidance in relation to providing open views over footpaths and Public Open Space.

Section 8.16 In general, planting next to a footpath should be arranged with the lowest-growing specimens adjacent to the path, and larger shrubs and trees planted towards the rear. Planting immediately abutting the path shall be avoided as shrubs and trees may grow over the path, creating pinch points, places of concealment and unnecessary maintenance.

Section 8.17 Careful consideration is required when selecting tree species to be used adjacent to a footpath or verge and consider their whole-life growth characteristics. Many trees will grow tall, dense canopies as they reach maturity. If unmaintained, this broad canopy will spread many metres from the trunk of the tree, and over-hang paths and may create difficulties in maintaining a clear, accessible route, in addition to creating a sense of enclosure for path users. Routes with overhanging branches can also be a particular issue for people with sight loss. A large canopy may also block natural light and restrict the effectiveness of street lighting.

Section 8.18 Trees with slender or fastigate forms naturally grow a narrow, tall canopy, and are less likely to over-hang paths regardless of their maturity. Similarly, pleached trees have been trained to produce a narrow canopy above a very straight, clear stem. A variety of species are available with similar growth forms, which provide height and structure without the issue associated with large canopies.

Section 8.19 Where footpaths run next to buildings or roads, the path shall be open to view. This does not prevent planting but will influence the choice of species and the density of planting. Defensible space shall be created to separate a path from a building elevation, to ensure that public footpaths are not immediately next to doors and windows. This is particularly important in areas with a known graffiti or anti-social behaviour problem.

Lighting of footpaths.

Section 8.21 Where it is expected that a footpath will be in constant use, it shall have all the required attributes as listed at **paragraph 8.12** and be lit in accordance with BS 5489-1:2020 (see Section 19). However, if such attributes are absent along a footpath, it may be advisable to discourage its use in some circumstances by not illuminating it during the hours of darkness.

Section 8.22 It is important that landscape architects, lighting designers and ecologists (where appropriate), co-ordinate their plans to avoid conflict between lighting and landscape provision, i.e. tree canopies. It is advisable that trees are planted at least 5m away from any light source. **See paragraph 19.2** regarding the technical requirements for public lighting, 'dark sky' policies and light pollution.

Section 8.23 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. The Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons. Further information is available at: <https://www.securedbydesign.com/initiatives/safer-streets>

1.2 Planting and Landscaping (Planting in new developments).

Landscaping must not impede natural surveillance and must not create potential hiding places for intruders, especially where it is adjacent to footpaths, public open space or where it may obscure views of and from doors and windows.

This is valuable in helping to maintain a clear field of vision around a site, and in reducing fear of crime and opportunities for crime.

Planting in new developments.

Secured by Design. Residential Guide. 2025. Section 18.

Section 18.1 Landscape provision such as the planting of trees and shrubs in new developments can enhance the health and well-being of residents and create attractive residential environments. The landscaping needs to be carefully designed to ensure it does not encourage crime and ASB as a by-product of its design. Designs will be supported provided that:

- The layout provides sufficient space to accommodate specimens once they have reached maturity, clear of access routes and required circulation areas, with shade and shadow at night being key considerations
- Future maintenance requirements and budgets are considered at the planting design stage, and management programmes are put in place to ensure the landscape fulfils the aims of the original design
- The planting design takes full account of all other opportunities for crime that may generate as a result of the scheme (or future maintenance)

Section 18.2 When designed and planted appropriately, certain species of plants such as spiny or thorny shrubs can help prevent crime, anti-social behaviour, graffiti and loitering, and create or enhance perimeter security. Defensive planting is not just about prickly shrubs, it is about selecting the right type of plant for the right aspect and environment, for example, open branched and columnar fastigiated trees can be used in a landscape scheme where natural and formal surveillance is required. Climbing plants can be used to cover walls to deter graffiti. Carefully selected trees and shrubs can be used to 'green up' the most hostile of environments providing both horizontal and vertical interest, without adding to crime risks.

Section 18.3 *Planting shall not impede the opportunity for natural surveillance and wayfinding, and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs shall be selected to have a mature growth height no higher than 1m, and trees shall have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision.* Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance, by modifying the natural growth habits. As a general rule, building frontages shall be open to view except, for example, houses standing in their own private grounds. Attention shall be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property or obscure lights or VSS cameras.

2. Further Information and Guidance.

Further help and information can be gained from the following web sites:

- www.securedbydesign.com
(The official Police Security Initiative and Police Preferred Specified security product scheme).
- 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).

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)
Architectural Liaison Officer.
(Designing Out Crime Officer.)