



**WEST YORKSHIRE
POLICE**

**West Yorkshire Police
Kirklees District**

Designing Out Crime Officer

West Yorkshire Police
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To: Victor Grayson Kirklees Council Planning Services	Ref: 2023/92476 Date: 4 th September 2023
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**Site Location: Land at Owl Lane, Chidswell, Dewsbury
Application Type: Discharge of Conditions**

Dear Victor

Thank you for your request for consultation for the above outline application.

Having read the available information, West Yorkshire Police **DO NOT** support the application to Discharge **CONDITION 9 – Street Lighting** in its current form.

Bollard lighting is **NOT** acceptable for a scheme of this size and the requirements for public safety and security. Bollard lighting **DOES NOT** conform to the previously advised **BS5489:2020** lighting standards as recognised and installed by the Local Authority Highways Department.

The shown bollard lighting is ineffective as a public safety measure due to the light spill being lower than 1m in height and the columns themselves being prone to vandalism and damage rendering them useless.

Several areas of the plan drawing number CHID_LBP_01 dated October 2021 for both public open space and private unadopted roads and footpaths are shown to have **NO** lighting cover at all.

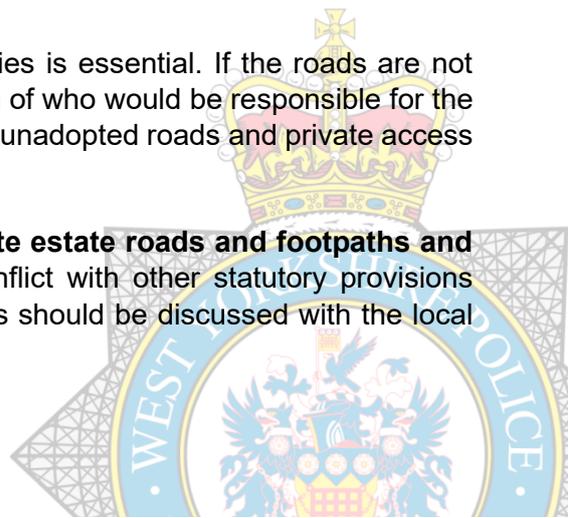
CONDITION 9 - Street Lighting is therefore requested **NOT** to be discharged at this stage and the applicants are requested to provide lighting to the BS5489:2020 standards along with a **detailed site lighting lux plan** which is fit for purpose and in the interest of public safety and security.

The below information is intended for the applicant to include in any amendments to the application to maximise the security of the development.

External lighting

Street lighting along the highways and private estate roads to properties is essential. If the roads are not adopted as Highway and maintained by the Local Authority, clarification of who would be responsible for the street lighting maintenance will be required. No lighting provision along unadopted roads and private access roads would leave properties vulnerable to crime and is unacceptable.

All street lighting for both adopted highways and footpaths, private estate roads and footpaths and car parks must comply with BS5489-1:2020 standard. Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements should be discussed with the local authority lighting engineer.



Landscaping, tree planting, CCTV and lighting schemes shall not conflict with each other.

The recommended Overall Uniformity of light for a development is expected to achieve a rating of 0.4Uo and should never fall below 0.25Uo. *The evenness of light distribution is almost always more important than the levels of illumination being achieved by the system (the levels are determined by BS5489-1:2020) The British Standards Institute have issued an advisory note stating that they recommend that Uo be at least 0.25 or 25%. A 0.4 Uo value is the ideal standard for a lighting system, but where technical reasons prevent this, we will still require the very best levels possible and under no circumstances may the rating fall below 0.25Uo.*

The Colour Rendering qualities of lamps used in an SBD development should achieve a minimum of at least 60Ra (60%) on the Colour Rendering Index.

It is advised that LED lighting standards are installed to produce downward lighting. This lighting should give a uniform spread of light around the site and not have any large areas of shade or shadow.

The site should provide external lighting such as low energy photoelectric cell or dusk until dawn lighting above all access doors of the building. Any fittings and wiring should be vandal resistant and located within inaccessible positions to deter any criminal attack.

Secured by Design

[HOMES GUIDE 2023 web.pdf \(securedbydesign.com\)](https://www.securedbydesign.com/HOMES_GUIDE_2023_web.pdf)

Security Enhancement Schemes

West Yorkshire Police encourages applicants to seek to build / refurbish a development incorporating the guidelines of **Crime Prevention Through Environmental Design (CPTED)**^{1&2}.

Enhanced security schemes such as **BREEAM / SABRE** together with **Secured by Design (SBD)**, offer developers additional security information and accreditation. The **SABRE** scheme is jointly operated by The Security Institute and the BRE Group.

Academic research by Huddersfield University has proven³ that building to enhanced security standards such as **BREEAM / SABRE** and **SBD**, reduces the opportunity for crime and the fear of crime as well as creating safer, more secure, and sustainable environments.

¹ Armitage R. (2013) *Crime Prevention through Housing Design: Policy and Practice*. Palgrave Macmillan: Crime Prevention and Security Management Book Series.

² Armitage, R. and Monchuk, L. (2018) What is CPTED? Reconnecting Theory with Application in the Words of Users and abusers. *Policing: A Journal of Policy and Practice*.

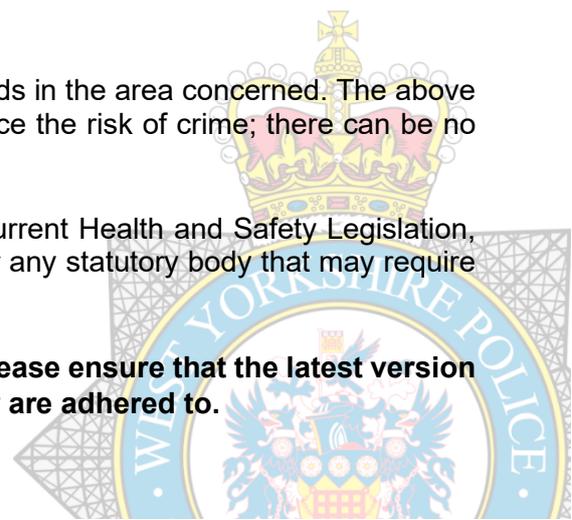
³ Armitage, R, and Monchuk, L (2011) Sustaining the Crime Reduction Impact of Secured by Design: 1999 to 2009. *Security Journal*, 24 (4), p. 320-343.

IMPORTANT General information

This advice is based upon concerns following recent current crime trends in the area concerned. The above advice expressed, is given as a view as to what measures might reduce the risk of crime; there can be no guarantee that the recommendations / concerns will prevent crime.

Before any measures are implemented you are advised to consider current Health and Safety Legislation, Planning Permission and consult with your local **Fire Safety Officer** or any statutory body that may require notification or consultation.

Note – National standards and specifications are often updated, please ensure that the latest version of the security standards and specifications specified in this letter are adhered to.



Policy Guidance

The National Planning Policy Framework (July 2021)

Section 8. Promoting healthy and safe communities

Para 8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

(b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and **safe places**, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

Para 92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

b) 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 attractive, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas.

Para 97. Planning policies and decisions should promote **public safety** and take into account wider **security and defence** requirements by:

a) anticipating and addressing possible **malicious threats** and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of **potential threats** and their implications. This includes appropriate and proportionate steps that can be taken to **reduce vulnerability**, increase resilience and **ensure public safety and security**; and

b) recognising and supporting development required for **operational defence and security purposes** and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

Section 9. Promoting sustainable transport

Para 106. Planning policies should:

d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as **secure cycle parking** (drawing on Local Cycling and Walking Infrastructure Plans).

Para 108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, **safe and secure**, alongside measures to promote accessibility for pedestrians and cyclists.

Para 110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

b) **safe** and suitable access to the site can be achieved for all users.

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.



Para 112. Within this context, applications for development should:

c) create places that are **safe, secure** and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

Section 11. Making Effective Use of Land

Para 119. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring **safe** and healthy living conditions.

Section 12. Achieving well-designed places

Para 130. Planning policies and decisions should ensure that developments:

f) create places that are **safe**, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where **crime and disorder**, and the **fear of crime**, do not undermine the quality of life or community cohesion and resilience.

Kirklees Local Plan (February 2019)

Policy LP24 supports the above statement and mentions that new developments should incorporate crime prevention measures to achieve:

Section (e). – *“the risk of crime is minimised by enhanced security, and the promotion of well – defined routes, overlooked streets and places, high levels of activity and well –designed security features”.*

Kirklees Supplementary Planning Documents (June 2021)

The applicants are referred to the adopted **Housebuilders Design Guide** and **Open Space Supplementary Planning Documents** (June 2021).

Crime and Disorder Act, 1998

This report is submitted in the interests of crime prevention and addresses our collective responsibilities under:

Section 17 - Duty to consider crime and disorder implications.

- (1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,
 - a) **crime and disorder** in its area (including anti-social and other behaviour adversely affecting the local environment); and
 - b) the misuse of drugs, alcohol and other substances in its area; and
 - c) re-offending in its area.



Summary

West Yorkshire Police feel that the above recommendations would be beneficial to the security and safety of the site users and general public. Therefore, it is advised that the points raised in this document should be implemented and any re-submitted plans from the applicant to be assessed by a Designing Out Crime Officer prior to a final planning decision.

Yours sincerely

Richard Thornton MSyI
Designing Out Crime Officer

Telephone Police Non-Emergency – 101
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