

Observations By:	KC, Crime Prevention
Application No.	2024/90058
Proposed Development:	Reserved Matters application, including the considerations of appearance, scale, layout, and landscaping, for the erection of 67 dwellings, pursuant to outline permission 2020/92307 for the erection of residential development (up to 75 units) and the discharge of conditions 7 (include a Written Scheme of Archaeological Investigation (WSI) and Designer's Response), 8 (Foul and Surface Water Drainage Strategy), 9 (flood routing), 10 (mitigatory tree-planting), 11 (cycle parking), 12 (Arboriculture Assessment), 13 (Ecological Design Strategy), 14 (Ecological Impact Assessment), 15 (noise impact assessment)
Location:	Penistone Road/, Rowley Lane, Fenay Bridge, Huddersfield, HD8 0JS
OS Map Reference	SE 418746.693 414496.8166
Applicant/Agent:	Johnson Mowat
Class:	Small Major Developments

NPPF National Planning Police Framework (Section 8. Promoting healthy and safe communities).

Secured by Design [COMMERCIAL GUIDE 2023 v4.pdf \(securedbydesign.com\)](https://www.securedbydesign.com/COMMERCIAL_GUIDE_2023_v4.pdf)

This advice 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.

Threat and Risk

The level of security at the site should align with any identified threat and risk. Therefore, it is advisable to adopt a pragmatic approach towards security requirements, even if the specific end users have not been identified yet.

Residential properties are vulnerable to attack from motivated criminals seeking to break into homes, targeting high value goods including family cars. The most common attack point is at the rear or side of properties.

Risk of not considering security at an early stage –

1. Inadequate protection
2. Increased risk
3. Wasted resources – due to theft / damage / anti-social behaviour etc.
4. Delay, disruption and cost caused by retro – fitting security measures post attack / incident.
5. Reputational damage.

Review

I note the inclusion of Secured by Design in the design process (Design and Access Statement 3.2 PLANNING CONTEXT PLANNING POLICY DESIGN GUIDANCE. This is good to see.

West Yorkshire Police have no objection in principle to the development, providing that the following recommendation is considered and implemented as part of any planning approval.

Recommendation – Should the Local Planning Authority be minded approving it, West Yorkshire Police respectfully suggest the inclusion of a condition requiring the development achieve Secured by Design accreditation.

Boundary / Perimeter security – I have noted the proposed boundary plan, and it is acceptable.

Void – The importance of suitable lighting including the intended public open space are detailed below in the advice provided. Any cycle storage areas and garages also need to be adequately secured.

Building shell – Please note suitable security standards for doors and windows below.

Risk Treatment Plan

Not all risks can be removed. But sensible and proportionate plans can substantially mitigate these risks. The inclusion of SBD methodology to date in the project provides

a good security foundation. Achieving an SBD accreditation at Gold or Silver would ensure that the site is protected in a proportionate manner.

West Yorkshire Police encourage applicants who are involved in new builds or redevelopments to incorporate CPTED (Crime Prevention Through Environmental Design) principles together with Secured by Design (SBD), a crime prevention initiative operated by the Police Service and supported by the Home Office.

The purpose of SBD is to guide and encourage those engaged in the specification, design and build industry into adopting crime prevention measures which have been proven to reduce the opportunity for crime and fear of crime, creating safer, secure, and sustainable environments.

The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.4). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.

Research documentation can be found on the SBD website.

Research conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO₂ per annum. This is roughly equivalent to the total CO₂ output of 6 million UK homes.

To obtain details on accredited products, information or to obtain an application form to apply for an award for a new development or redevelopment, please visit the website www.securedbydesign.com

The below information is intended for the applicant to include in any amendments to the application to maximise the security of the development. While not all points will be applicable to this proposal, in the first instance, they form a useful guide for applicants in developing a robust and proportionate security plan.

Defensible space

Shared rear access footpaths - Such footpaths must not be placed at the back of properties. If they are essential to give access for residents, they must be provided with gates placed at the entrance to the footpath, as near to the front building line as possible. Gates should be lockable from both sides. Street lighting should also be designed to ensure illumination of the gate area.

Boundary treatments - It is recommended the rear boundary treatments for each plot are to a height of 1800mm such as masonry materials, close boarded timber fencing or other durable materials. Rear plot dividers in height of 1800mm consisting of the same material as above should be installed between properties.

Additional trellis topping fencing can be added to the top of any fencing to enhance the security and prevent climbing access. This type of fence topping is fragile and will break when climbed. It also allows for better natural surveillance through the fencing.

Access must be restricted from the front of each plot into the rear garden by installing a 1800mm high lockable gate. This gate should be positioned near to the front building line to eliminate recesses and to increase natural surveillance restricting unauthorised access.

All external facing boundary treatments **MUST** be smooth faced with no footholds or cross members to enable climbing access.

Dwelling front boundaries - Plots with open front gardens, should have a marked boundary that clearly distinguishes the private space of the garden, from the public space outside it. This should consist of hedge / low wall / fence / railings of around 1m in height.

Open plan frontages often contribute to complaints of nuisance and anti-social behaviour. By having a robust form of boundary treatment, there will be no dispute over ownership and maintenance of particular plots. It will reduce the probability of desire lines being created across front garden areas.

The effect of having clear front boundaries would be to stop people casually wandering across the face of individual houses, a common cause of nuisance and conflict. The boundary also has the effect of defining “defensible space” adding to property security.

Rear gardens. Side boundaries dividing house plots from each other - Plot dividers need to be tall and substantial enough to provide both privacy and security.

Closed boarded timber fencing should be provided to a minimum 1.5m in height and include privacy screen (a section of higher fencing) of 1.8m in height projecting out from the building for about 2m, to provide a private amenity area adjacent to the home.

Access gates to rear gardens - Gates to the side of the dwelling that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked (operable by key from both sides of the gate). Such gates must be located on or as near to the front of the building line as possible.

Bin stores – Refuse bins must be placed behind a locked gate preferably within the rear garden. These must not be sited near ground floor windows, low roofs or boundary fences, as they will provide a climbing aid for offenders.

Natural surveillance

Public spaces to be well overlooked and illuminated - All public open space (POS) and publicly accessible areas should be designed to allow as much supervision as possible from nearby dwellings. This means including windows in gable elevations where appropriate. Lighting provision should be able to support this.

In addition, boundaries between public and private space needs to be clearly defined, including features that prevent unauthorised vehicle access, and POS should not immediately abut residential buildings, and should not be positioned bordering the rear of gardens. Buffer zones should separate rear gardens from any POS.

Trees and vegetation - In order to maximise natural surveillance on the site, all trees and hedges should be subject to a management scheme in order to maintain the heights and densities of the vegetation. Trees should have their canopy raised to 2m from the ground and low growing bushes and vegetation should be maintained to 1m in height. Defensible planting can be used as boundary treatments. Hostile plants such as *Berberis Vulgaris* can be planted parallel to fencing or below ground floor windows to create defensible space.

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.

Car parking - Provision should be in curtilage parking or within view of the car owner's home. Rear parking court areas hidden from view behind garden fencing are unacceptable. They are known to become associated with nuisance and anti-social behaviour as well as increasing the opportunity for car crime and rear access burglary.

Property security

Internal partition wall construction - Dividing walls between internal dwellings must be to STS 202 Issue 9: October 2020 BR1 standard or made from solid materials such

as concrete block or brick. Any internal partition wall made up from none-solid material such as plasterboard and wooden studwork should be reviewed for security purposes.

Door sets - As per Building Regulations (Approved Document Q), doors and windows should be to one of the following standards.

PAS 24:2022

STS 201 Issue 14:2021

STS 222 issue 1:2021

STS 202 Issue 10:2021 Burglary Rating 2.

LPS 1175 Issue 7.2:2014 Security Rating 2+

LPS 1175 Issue 8:2018 security rating A3+

LPS 2081 Issue 1:2016 Security Rating B.

All new builds must have the best possible door locks installed, especially the euro-profile cylinder lock types. Some of the door sets quoted above can include a minimum standard euro cylinder lock that meets TS007 standards and is 1 Star Rated. These locks offer **less resistance** to crimes relating to lock snapping which is still a common method of burglary across West Yorkshire.

It is strongly recommended that any doors that include a euro cylinder lock be rated to standards; TS007 3 Star, STS 217 or Sold Secure Diamond Standards. These offer more resistance to this type of attack and will prevent crime. Consult the door supplier to make sure that the PAS24 rating is not affected if locks are upgraded.

https://www.securedbydesign.com/images/downloads/DOORSET_BROCHURE_update_25.3.19.pdf

Secure Mail Delivery accessed via a private dedicated entrance door set - There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and ‘fishing’ for personal items (which may include post, vehicle and house keys, credit cards, etc). In order to address such problems SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation standard Technical Standard 009 (TS009:2019) or delivery ‘through the wall’ into a secure area of the dwelling. These should be easily accessible i.e., at a suitable height for a range of users.

Windows - Window frames must be securely fixed to the building fabric in accordance with the manufacturer's instructions and specifications. All easily accessible windows (including easily accessible roof lights and roof windows) must be certificated to one of the following standards:

BS PAS 24-2022

STS 202 Issue 10:2021 BR1

STS 204 Issue 6:2016

STS 222 issue

1:2016

LPS 1175 Issue 7:2:2014 Security Rating 1

LPS 1175 issue 8:2018 1/A1*

LPS 2081 Issue 1:1:2016 Security Rating A

Ideally, laminated glazing should be installed and certificated to a minimum of BS EN 356 P1A rating, so that if there are any attempts of entry the glass will remain intact.

Motorcycle and Cycle storage - Sheds or cycle storage security is important due to the value of goods often kept inside. If cycle storage is to be a wooden shed, there should not be any windows installed. The door hinges, including the hasp and staple should be coach-bolted through the shed structure. Any padlocks should look to be certified to Sold Secure Silver or LPS 1654 issue 1.1 2014 SR1.

The bicycle security anchor should look to be certified to Sold Secure Silver Standard or LPS 1175 issue 8 (2018) SR1 and securely fixed to the concrete foundation.

Motorcycle parking bays can be made more secure by the installation of ground anchors, or robust metal support stands running at the side of adjacent paving. They provide a firm and immovable object to affix the rear wheel of a motorcycle. Ground anchors should be installed at the rear of motorcycle parking bays near to the kerb line and relatively flush to the road surface to prevent them being a trip hazard and meet one of the following security standards:

- Sold Secure Gold
- STS 503

If metal support stands are provided, these should consist of galvanised steel bars (minimum thickness 3mm), with minimum foundation depths of 300mm with welded anchor bars.

Intruder alarms - It is recommended to install an intruder alarm into each plot to provide additional security. Suitable standards are to BS EN 50131 or PD6662 (wired alarm system) or BS 6799 (wire free alarm system). Alternatively, if intruder alarms are not being provided by the Developer, installing a 13-amp spur point is a cost-effective measure to apply and will allow residents the option of purchasing their own intruder alarms.

Maintenance

Rule setting or polite reminders for example on emptying bins and taking these out on time, not leaving littering in the garden, leaving the communal hallway tidy, ensuring the entry door closes after entry and egress, and not allowing tailgating into the building and ways to help secure the building and prevent any ASB problems with other residents or existing neighbours.

In order to maximise natural surveillance on the site, all trees and hedges should be subject to a management scheme in order to maintain the heights and densities of the vegetation. Trees should have their canopy raised to 2m from the ground and low growing bushes and vegetation should be maintained to 1m in height.

Garages - If a development incorporates garages and the developer wishes to gain the full SBD Gold Award then the security of both the dwelling and the garage must be considered. If a garage is not secured as part of the security of the dwelling, or it is detached from the dwelling, then external pedestrian access doors must meet the same physical, locking and fixing specification, as 'Dwelling entrance door sets' (Section 23). 62.2 Vehicle access door sets shall be certificated to one of the following standards (Note 62.2):

LPS 1175 Issue 7.2:2014 Security Rating 1+ (or above), or
LPS 1175 Issue 8:2018 Security Rating 1+/A1+ (or above), or
STS 202 Burglary Rating 1+ (or above), or
LPS 2081 Issue 1:2015 Security Rating A, or
STS 222 Issue 1:2021 Note 62.2:

Where a manufacturer has demonstrated, to the satisfaction of SBD, that compliance with a similar alternative standard from another supplier or country has been achieved this may be accepted as an alternative to the above standards.

Alternatively, a vehicle access door that is not certificated to one of the above standards, and not subject to the requirements within the English and Welsh Building Regulations (Approved Document Q), may be deemed satisfactory if an external 'garage door defender' type security product is also fitted. Such products must be certificated to Sold Secure Bronze level or above.

- is located within a secure development with access control and security patrols or
- The shutter or grille is intended to prevent access into a recess or
- The door or window to be protected is of a high security standard.

Security glazing - All ground floor and easily accessible glazing must incorporate one pane of laminated glass to a minimum thickness of 6.8mm laminate pane which would be successfully tested to BS EN 356:2000 P2A rating - *Glass in building*. All glass types that achieve a BS EN 356 rating, whether it's at the lower end of the scale (P1A-P5A) or the far end (P6B and above) would be classed as a security glass since they achieve some degree of burglary resistance according to that standard. It is a recommendation for all laminated glass in commercial premises to be certified to BS EN 356 2000 P6B rating or above unless it is protected by a roller shutter or grille.

Security Enhancement Schemes

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 **SBD, BREEAM and SABRE**, reduces the opportunity for crime and the fear of crime as well as creating safer, more secure, and sustainable environments.

Research

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.

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(Covering for Kirklees DOCO absence)

