

Consultee Comments for Planning Application 2024/93366

Application Summary

Application Number: 2024/93366

Address: former Britvic premises, Willow Lane, Birkby, Huddersfield, HD1 5EB

Proposal: Change of use from B2 to mixed used site consisting of B2 (General Industry), B8 (Storage and distribution), class E (offices), Class F (Learning and non-residential institutions), exhibition / venue space.

Case Officer: Danielle Cooper

Consultee Details

Name: Agnes Boryn- Kirklees DOCO, West Yorkshire Police

Address: Huddersfield Police Station, Castlegate, Huddersfield, HD1 2NJ

On behalf of: West Yorkshire Police

Comments

Thank you for your request for consultation on the above application. The comments are made with the intention of reducing opportunities for future crime and antisocial activity which addresses our collective responsibilities outlined in Section 17 of the Crime and Disorder Act 1998, by creating safe and secure developments where people will want to reside, visit, or work.

The recommendations are supported by the following guidance:

NPPF National Planning Policy Framework (Section 8. Promoting healthy and safe communities) <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Kirklees Council Planning and development policy

<https://www.kirklees.gov.uk/beta/planning-and-development.aspx>

Kirklees Development Plan <https://www.kirklees.gov.uk/beta/planning-policy/local-plan.aspx>

Secured by Design www.securedbydesign.com

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.

Acquisitive Crime and Antisocial Behaviour Threat and Risk

The level of security at the site should align with any identified threat and risk and the proposed business of the end users. Therefore, it is advisable to adopt a pragmatic approach towards security requirements and take note of the crime and incident information listed below. I am concentrating on arson, criminal damage, robbery and business burglary in this assessment.

Risks of not considering security at an early stage:

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

Current, relevant crime statistics in the locality:

I have conducted a search using WYP crime data and mapping tool. The search covered offences committed between 13/03/2024 and 13/03/2025. The search criteria included arson, criminal damage, robbery and business burglary for partial postcode HD15*. This returned 68 offences: 1x arson, 40x criminal damage, 10x robbery, 17x burglary business.

Of note:

5 of the robberies were committed by unknown suspects (i.e. strangers) in the street, with property stolen from victims.

Majority of business premises targeted in the burglaries were entered following suspect/s smashing glass in doors or windows, or removing boarding from same.

Vast majority of criminal damage matters relate to dwellings. Again, damage to panes of glass was the predominant issue. However, some properties have also been targeted with paint thrown/ sprayed over them.

Current ASB statistics in the locality:

I have conducted a search using WYP incident data and mapping tool. The search covered ASB/ nuisance type incidents which occurred in HD15* area between 13/03/2024 and 13/03/2025. This returned 20 incidents, 1 of which was logged at the site of proposed development and related to nuisance youths being rowdy and setting fires in the car park. It was described as a recurring issue, albeit no other reports have become apparent in the above search which incorporated a 12-month period.

Proposed uses

As for the new proposed uses of the site, I have some concerns about the compatibility of these.

Basement area is to be utilised as recording studios and a live music venue, with additional venue hire space on the second floor. More information is required in relation to the music and hire venues' capacity, opening hours and whether the sale of liquor is intended; depending on the information provided, the application may need to be referred to CT Security Advisors as part of assessment into crowded places and publicly accessible locations.

As per Kirklees Licensing Police Constable: should the sale of alcohol be intended at the premises, a licence will be required. If granted, it will specify times when alcohol can be served. A licence will also be required to play amplified music.

The level of noise will also need to be considered- I appreciate this lies with the Environmental Services.

Music events can take place into the late hours which would have an impact on the residential properties nearby and the volume of traffic in the immediate area, bringing along some night-time economy and potentially some negative byproducts.

I would also like to see more detail in relation to how various businesses onsite will be compartmentalised and managed- office spaces and warehouse/ storage areas will likely be more operational during daytime whereas the music venue and the venue hire areas may stray into later hours/ night time. Should this be the case, the offices and warehouse are required to be separated and secured overnight to prevent opportunities for acquisitive crime, trespass and antisocial behaviour. Appropriate access control and rule setting should be introduced in relation to securing various areas and the site itself outside of operating hours; this can be achieved by placing access-controlled points within the building, including communal areas/ facilities such as staircases and the lift.

Additionally, suitable signage is required to avoid confusion, assist movement control on site and direct customers to the business or venue they are visiting. The site should be clearly marked as private property to reinforce the sense of territorial ownership.

Location plan/ proposed site layout

Given the size of the site and the number of proposed uses, parking provision appears insufficient. Having read the Proposed Usage Statement, I note that "there will be an area designated for private vehicle storage". Ideally, this needs to be shown on the site

map and located where it will not prevent or obstruct access to the building or fire escape routes.

Parking spaces should be clearly marked out and allocated to avoid potential conflict between tenants and visitors/ customers. Parking areas should be overlooked, well-lit and covered by CCTV. Poorly maintained and insecure car parks can attract acquisitive crime and antisocial behaviour.

I note that the bins are located in the southeast corner of the site. These should be secure and lidded to prevent odours, vermin and being used as a climbing aid. The boundary wall/ fencing should ensure that the bins cannot be used to assist in accessing neighbouring residential premises. Given that the bins are surrounded by parking spaces, please ensure that a refuse truck will be able to attend the yard and collect the waste without issue.

Boundary/ perimeter should be secured with appropriate fencing to restrict excessive permeability. Gates must be locked when the site is not in use to prevent crime and ASB. Keyholders and staff responsible for securing the site should be identified by the site's owner/ manager.

Recommended security measures, as per the SBD Non-residential Guide 2025:

Please note national standards and specifications are often updated, please ensure that the latest version of the security standards and specifications specified in this document are adhered to.

Roller shutters and grilles

Roller shutters and grilles can provide additional protection to both internal and external doors and windows. They 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+

Doorsets

External doorsets shall be certified to one of the following minimum standards, or above:

PAS 24:2022, or

PAS 24:2022+A1:2024, or

STS 201 (certified to PAS 24:2022+A1:2024), or

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+

Doors providing vehicular access

Doors providing vehicular access for deliveries and other entrances where no other door is present 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 B3+, or

STS 202 Issue 12 Burglar Resistance BR2, or

LPS 1673 Issue 1 Attack Rating AR.A180+

Windows

All easily accessible windows shall be certified to one of the following minimum standards, or above:

PAS 24:2022+A1:2024*, or

STS 204 (certified to PAS 24:2022+A1:2024), or

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

Glazing

All glazing in windows that are easily accessible must include one pane of laminated glass certified to BS EN 356:2000 Class P1A, or above, securely fixed in accordance with the manufacturer's instructions.

Secure mail delivery

For the majority of non-residential buildings, it is expected that mail delivery will take place during business hours and that the mail will be handed in at reception.

Communal mail and parcel delivery facilities should incorporate the following:

- External delivery facilities shall be positioned adjacent to the entrance area
- Internal delivery facilities shall be positioned within an entrance area with automated access control
- Automated access control to this area shall have a data logging facility
- Both internal and external delivery areas shall be comprehensively covered by a VSS (CCTV)
- Mail and parcel delivery drop boxes shall be equipped with high security cylinders that are not subject to master key access
- Mail and parcel delivery drop boxes shall be of robust construction, shall incorporate an anti-fishing design and be fire resistant Individual letter boxes shall have a maximum aperture size of 260mm x 40mm; they must be installed in accordance with the manufacturer's specification.

Letter plates and letter boxes must meet one of the following requirements:

- a robust external letter box securely fixed to the external face of the building in accordance with the manufacturer's specifications with fire retardation and anti-fishing attributes
- a letter plate located within the wall, providing 'through the wall' delivery via a sloping chute into a secure internal letter box with fire retardation and anti-fishing attributes.

Letter plates for the above must comply with BS EN 13724:2013 and must have a maximum aperture size of 260mm x 40mm (DHF TS 008).

Letter boxes certified to Door & Hardware Federation Technical Specification 009 (TS 009) offer reassurance that all of the above attributes have been met. In high crime areas, TS 009 provides the safest means by which mail can be delivered, whilst eliminating the risks associated with mail delivery i.e. arson, 'phishing' for personal mail.

External lighting

In terms of security, the objective of lighting non-residential units after dark is to deter or detect an intruder.

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.

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.

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.

Bollard lighting is not advised from a crime prevention perspective due to low light spill and vulnerability to criminal damage.

CCTV/ VSS (Video Surveillance Systems)

Although video surveillance systems (VSS) are not a solution to all security problems, they 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.

The VSS must record at a minimum of 25 frames per second so events can be watched, monitored and reviewed 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. The system should have capacity to store images for at least 30 days, be installed to BS EN 62676 (Video surveillance systems for use in security applications) and compatible with planned lighting system. Please consider vandal-resistant housings for easily accessible cameras to prevent damage and loss of evidence.

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>

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.

Intruder alarm

Intruder alarm 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.

CCTV and intruder alarms should be installed by NSI/ SSAIB contractor.

In conclusion, due to the concerns regarding mixed uses identified above and insufficient information available at this time, West Yorkshire Police are UNABLE TO SUPPORT this application in its current form.

As per 'Safer Places – The Planning System and Crime Prevention' (Home Office 2004), the current proposal does not appear to fulfil at least 2 of the 7 attributes of sustainable communities: Structure designed to avoid conflict between various uses and Activity- level of human activity appropriate to the location and creating reduced risk of crime and sense of safety at all times. As for the other 5 attributes- I am unable to comment further at this time due to lack of detail.

Kind regards,

Agnes

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District
E-mail: agnes.boryn@westyorkshire.police.uk