

Consultee Comments for Planning Application 2025/90517

Application Summary

Application Number: 2025/90517

Address: land off Forge Lane, Thornhill Lees, Dewsbury, WF12

Proposal: Outline application, including the consideration of access and layout, for two commercial units (use class B2 and/or B8) and associated works

Case Officer: Jillian Rann

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 Local Plan <https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf>

Secured by Design www.securedbydesign.com

Crime Prevention Through Environmental Design (CPTED)

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 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.

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 crime statistics and issues of note in the locality:

I have conducted a search using WYP crime data and mapping tool. The search covered offences committed between 14/07/2024 and 14/07/2025. The search criteria included burglary business, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for Thornhill Lees area.

This returned 65 offences: 5x arson, 4x burglary business, 3x robbery, 29x criminal damage (1x non-dwelling, 18x dwelling, 7x vehicle, 3x non-specific), 1x vehicle interference, 10x theft from vehicle, 13x theft of vehicle.

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 Thornhill Lees area between 14/07/2024 and 14/07/2025. This returned 23 incidents, 6 of which were in close proximity to the premises.

West Yorkshire Police have no objection in principle to this application. We would like to be further consulted throughout its subsequent stages.

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.

Construction phase security

Unfortunately, there are many crimes which occur during the construction phase (including enabling works) of a development. Secured by Design recommend that security should be considered throughout the life cycle of the development and be in place prior and during the construction phase. For example, this should include robust perimeter fencing of the site and (where appropriate) a monitored alarm system (by a company or individual who can provide a response) for site cabins and those structures facilitating the storage of materials and fuel.

The developer is advised that signage should be displayed across the development (i.e. on the perimeter fencing) and should contain the emergency contact details and point of contact. This will allow both the public and staff members to report suspicious behaviour and circumstances.

Mobile or part-time video surveillance systems (VSS) can be used as an effective aid to the security of a site and can act as a deterrent to criminal activity.

Perimeter security and site access

Single and multiple unit developments should be contained within secure perimeters with access controlled entrances.

SBD recommends the use of one main entrance into an enclosed non-residential development serving both vehicles and pedestrians. If vehicle and pedestrian entrances must be separated, these access points shall be adjacent to each other in order to promote mutual supervision. There shall be clear demarcation between the roadway and the footway with a safety barrier positioned to protect pedestrians from vehicles. Where additional entrances are required to provide emergency access and egress, these can be controlled by electronic access and video surveillance systems.

Fences, gates and barriers shall be certified to one of the following standards, or above:

LPS 1175 Issue 8 Security Rating C5

STS 202 Issue 12 Burglar Resistance BR3

LPS 1673 Issue 1 Attack Rating AR.C180

The height and length of gates shall be consistent with the dimensions of the boundary fence into which they are set and shall close any gap beneath them to ground level, to account for the change in road or pavement levels and/ or camber.

Landscaping

Planting designs must mitigate against crime rather than contribute towards opportunities to commit it. Landscaping must be maintained to ensure it does not blind the VSS or obscure lighting. Future maintenance requirements shall be considered at the design stage.

Soft landscaping to the front of non-residential units is good design practice provided that it is set away from footpaths and is not allowed to become overgrown to the extent where doors, windows and other access points become obscured. An area of hard paving in front of a unit can reduce the likelihood of overgrown plants providing cover for criminal behaviour.

External waste storage

Waste and rubbish containers, particularly wheelie bins, can be re-positioned and used to aid climbing to vulnerable parts of buildings whilst their contents can be used as fuel for arson attacks. To combat these two risks the bins shall be retained in a lockable roofed store set apart from the main buildings and the containers themselves fitted with lockable lids. Advice in respect of a safe stand-off distance, fire and smoke detection devices and fire sprinkler systems shall be sought from the appropriate fire authority. Adequate secure provision (as above) for temporary storage of all recyclable materials awaiting collection or other processing shall be provided.

Cycle parking/ storage

External bicycle parking facilities will be designed for secure storage using bicycle lockers, hangers or dedicated storage devices and shall be certified to one of the following minimum standards, or above:

LPS 2081 Issue 1 Security Rating B, or
STS 225 Issue 2 Burglar Resistance BR2(S), or
STS 205 Issue 8 Burglar Resistance BR2, or
LPS 1175 Issue 8 Security Rating B3, or
Sold Secure SS104 Silver, or
STS 501 Security Rating TR2, or
STS 503 Security Rating TR2

It is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of any bicycle storage facilities and/ or other areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion powered vehicles have been considered and specified.

Automated access control systems

Automated access control system (AACS) is likely to be required at the main entrance to non-residential developments and may also be required on some internal doorsets, such as those that lead from an entrance lobby or reception into offices and production and warehouse floors. Therefore, an electronic access control system is required for all pedestrian and vehicular entrances, which can be operated by access codes or key cards; the security levels shall be checked after installation and shall be strictly managed so that codes and cards can be added and deleted as necessary. Automated access control systems shall have a data logging facility and comply with UL293.

An intrusion detection system (IDS) will detect and signal the presence of an intruder, or an intrusion attempt, into a secured area. A secured area can be a selected room, an entire building, or group of buildings. Further information is available from the NPSA at: <https://www.npsa.gov.uk/intrusion-detection>. Systems shall comply with BS EN 60839 - Alarm and Electronic Security Systems.

CCTV/ VSS

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.

It is important that an operational requirement for VSS is drawn up for non-residential premises in accordance with their specific use and that the objectives for the VSS are clearly established before a tendering process is started.

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 and landscaping schemes.

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.

CCTV/ VSS should be installed by NSI/ SSAIB approved contractor.

Intruder and hold-up alarm systems

Intruder and hold-up alarm systems 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.

Intruder alarm should be installed by NSI/ SSAIB approved contractor.

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 and landscaping, 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 recommended due to low light spill and vulnerability to criminal damage.

Roller shutters/ 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+

In the event of an emergency, it must be possible to secure electrically operated roller shutters and grilles quickly from a safe location within the premises.

As this site will be newly constructed, roller shutters could be integrated into the fabric of the buildings.

Doorsets and windows

BS 6375-2:2009 defines the resilience and operational characteristics of both doorsets and windows which, in simple terms, means to test a doorset or a window to ensure that it will withstand the demands of repeatedly being opened and closed over a significant period of time. Class 4 (moderate use) is usually deemed sufficient.

From a Secured by Design perspective, doorsets and windows must meet the security requirements of either STS 222, LPS 1175, STS 202 or LPS 1673 and be able to survive many cycles of repeated use.

The recommendations for doorsets and windows for this site may vary in the future, depending on the occupants and their nature of business.

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

STS 222 Issue 4 Burglar Resistance BR2(S)

LPS 1175 Issue 8 Security Rating A3+
STS 202 Issue 12 Burglar Resistance BR2
LPS 1673 Issue 1 Attack Rating AR.A180+

The responsibility for the specification and location of security, fire and/ or smoke rated doorsets lies with the developer or the developer's agent (or whoever is designated as a responsible person as defined by The Regulatory Reform (Fire Safety) Order 2005). Fire doors shall be alarmed to prevent them being left open for ventilation or regularly used as part of a short cut route for staff.

Doors providing vehicular access should be certified to one of the following minimum standards or above:

STS 222 Issue 4 Burglar Resistance BR2(S)
LPS 1175 Issue 8 Security Rating B3+
STS 202 Issue 12 Burglar Resistance BR2
LPS 1673 Issue 1 Attack Rating AR.A180+

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

STS 222 Issue 4 Burglar Resistance BR1(S)
LPS 1175 Issue 8 Security Rating A1
STS 202 Issue 12 Burglar Resistance BR1
LPS 1673 Issue 1 Attack Rating AR.A180

Easily accessible in these circumstances means:

A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or

An access balcony, or a window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30°) that is within 3.5 metres of ground level.

Security glazing

All ground floor and easily accessible glazing must incorporate one pane of laminated glass or glass tested to BS EN 356:2000 (Glass in building. Security glazing. Testing and classification of resistance against manual attack) to category P2A or above, unless it is protected by a roller shutter that meets appropriate security standards (see the section above relating to roller shutters for details).

Easily accessible definition as per previous paragraph.

Information about Secured by Design

The SBD Non-Residential Award ranges from new schemes to refurbishments of existing buildings. The scheme encompasses both non-residential developments where the public have no formal access, such as industrial units, factories, warehouses and office buildings, and those where public access is integral to the non-residential use, such as retail premises, leisure centres and public service buildings. Such developments may range in size from a single unit with a defined use to a group of buildings with multiple uses.

Secured by Design provides design guidance and specification requirements for non-residential premises so as to reduce the risks of crimes against the person or property such as burglary, theft, arson, vehicle crime and assault; there is often an accompanying reduction in the fear of crime and antisocial behaviour.

Secured by Design is owned by the UK Police Service and supported by the Home Office.

For detailed requirements of SBD Non-Residential Gold, Silver and Bronze award, please refer to the Secured by Design Non-Residential (Commercial) Guide 2025 which can be found at www.securedbydesign.com, under 'Specialist Design Guides' section. If you would like to apply for the Secured by Design award, please use the 'SBD Non-Residential' application form which can also be found at the above website.

Kind regards,



Agnieszka Boryn
Designing Out Crime Officer
Kirklees District