Consultee Comments for Application 2025/90548

Application Summary
Application number: 2025/90548
Location: 78 John William Street, Huddersfield, HD1 1EH
Proposal: Change of use and alterations to convert offices to 14 apartments (use class C3) (Listed Building within a Conservation Area)
Planning Officer: William Simcock

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 information regarding crime and ASB outlined below.

A development such as this is vulnerable to attack from a motivated criminal seeking to break into the property, by exploiting vulnerabilities in the built environment and poor physical security measures.

I am concentrating on residential burglary, arson, criminal damage and theft of pedal cycle in this assessment.

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 retrofitting security measures post attack / incident.
5. Reputational damage.

Current crime statistics in the locality:

I have conducted a search using the WYP crime data and mapping tool. The search covered offences committed between 06/07/2024 and 06/07/2025 and included residential burglary, arson, criminal damage and theft of pedal cycle in the partial postcode area of HD1 1*.

This returned 48 results: 6x residential burglary, 3x arson, 32x criminal damage (10x non-dwelling, 4x dwelling, 11x motor vehicle, 7x non-specific), 7x theft of pedal cycle.

Residential burglary- the predominant means of gaining entry was by attacking the door or removing/ tampering with window boarding. Stolen property included portable electrical appliances and clothing.

Arson- no residential properties have been targeted. One of the matters involved a bin set on fire. Refuse containers need to be securely stored away post-collection, behind an access controlled door, to prevent such issues at the site.

Criminal damage- nothing apparently of note for this application.

Theft of pedal cycle- majority of the stolen pedal cycles/ e-bikes were left unattended and insecure outdoors.

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 HD1 1* area between 06/07/2024 and 06/07/2025. This produced 43 results, 12 of which were recorded in the vicinity of the site. These mostly related to issues at commercial premises nearby involving nuisance youths, homeless/ intoxicated nominals and begging.

Site review
Cycle store- can the applicant please provide details of proposed security measures. I note the mention of secure provision for residents and short-stay cycle parking for guests. Also, where will the latter be located?

Planning Statement- I am pleased to see the 'Crime Prevention' section and security measures mentioned within the proposal- access control, door entry system and high security locks for each apartment.
Can further details be provided when available, please. Apartment lock wise, I recommend cylinders of TS007, 3-Star Diamond certification.
Please note that entry to the building via a panel with numbered code is not supported from a crime prevention point of view. Tenants could easily share codes with their visitors and such a solution will leave the site vulnerable following residents moving out. I would recommend the use of key fobs or cards with a proximity reader instead; they should be programmable and have the ability to be cancelled should a resident move out.
All access control systems must be fitted by NSI/ SSAIB contractor and meet the standard of UL 293. Occupants must have unrestricted egress from the building in the event of emergency or power failure.

Lastly, how will mail delivery be managed, please?

West Yorkshire Police have no objection in principle to this application.
It is requested that a PLANNING CONDITION for SECURITY MEASURES is applied to this application in the interests of crime prevention and community safety.

Recommended security measures, supported by SBD Residential Guide 2025:

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

Lightweight framed walls in houses and buildings containing multiple dwellings or bedrooms

The security of a development can be severely compromised if lightweight framed walls do not offer sufficient resilience to withstand a criminal attack; this is recognised within Approved Document Q.
Lightweight framed walls installed either side of a secure doorset (600mm for the full height of the doorset to restrict access to door hardware) or walls providing a partition between two dwellings, or a dwelling and shared communal space, shall meet 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
and be installed by suitably trained, approved installers.

As an alternative, although not originally intended to enhance security, the following 'Robust Details' have shown to offer some resistance to intrusion:
E-WT-2 (timber wall construction)
E-WS-3 (light steel construction)
E-WM-20 (masonry wall construction)
subject to a fire risk assessment, security can be enhanced by the installation of expanded metal in the areas concerned.

Doorsets and windows
The term 'doorset' refers to a door, frame, locks, fittings and glazing as one combined unit.

BS 6375-2:2009 specifies performance requirements for the operation and strength of manually operated windows and internal/external pedestrian doorsets in their fully finished condition. In simple terms, this means testing a doorset or a window to ensure

that it will withstand the demands of being opened and closed repeatedly over a significant period of time.

From a Secured by Design perspective, doorsets and windows must meet the security requirements of either PAS 24, STS 201, STS 204, LPS 2081, STS 222, LPS 1175, STS 202 or LPS 1673 and be able to survive many cycles of repeated use.
Door frames must be securely fixed to the building fabric in accordance with the manufacturer's instructions and specifications.

All doorsets allowing direct access into the home (e.g. front/ rear doors, dedicated private flat or apartment entrance doorsets, communal 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)
LPS 2081 Issue 1 Security Rating B+
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+

Flat/ apartment entrance doorsets are required to be security, fire and smoke rated. The role of the flat or apartment entrance doorset (the final doorset providing access to the dwelling) must not be underestimated in the event of a fire. It is therefore imperative that fire resistance is professionally assessed and measured and the doorset is installed by a competent person who possesses the appropriate qualifications. Part B of the current Building Regulations and the associated guidance in Approved Document B state such doorsets must achieve at least 30 minutes of fire resistance. Additional requirements are also specified for smoke leakage.

If the individual flat entrance doorset to an apartment is the designated emergency exit route and there is no alternative means of escape, a locking mechanism with a solid spindle is required. A split spindle is not acceptable in these circumstances as it would prevent the closed door from being opened from the communal corridor/stairwell area without a key.
Occupants must have the opportunity to unlock the door from the inner face without the use of a key, investigate the cause of a fire or other emergency and return to raise the alarm without any use of a key – the only function that a key may have is to lock and unlock the door from the fully secure position from the outer face of the door when leaving an empty dwelling or returning to a secure dwelling (occupied or unoccupied). Thumbturn locks are required on all apartment doors.

Installation of door chains/ opening limiters and door viewers is recommended, in the interests of resident safety and crime prevention. These should meet the Door and Hardware Federation Technical Specification 003 (TS 003) for chains/ opening limiters and 002 (TS002) for door viewers.

Alternative access doorsets, emergency egress and fire doorsets that may be used by residents to access communal parts of the building are also required to be 'secure doorsets', see Approved Document Q, Section 1, paragraph 1.1.

Where a glazed vision panel is installed in communal entrance doorset, it must form part of the manufacturers certified doorset range. Part Q of the Building Regulations (England and Wales) and Building Standards 4.13 (Scotland) both reference PAS 24:2012. Therefore, the minimum specification for any glazing within shared or communal entrance doorsets is BS EN 356:2000 Class P1A, or above. It should be noted that PAS 24 makes exactly the same requirement.

All easily accessible windows shall incorporate key lockable hardware unless designated as emergency egress routes within the Building Regulations. Windows that form part of a designated fire escape route, as determined by the Fire Safety Officer, may require non-key locking hardware. Windows that are not easily accessible will require either lockable hardware or an opening restrictor in the interests of safety.
Easily accessible is defined within Approved Document Q Appendix A as:
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.

Access control and additional security requirements for buildings containing multiple dwellings or bedrooms

- **Visitor door entry systems**

A door entry system is a visitor system that is able to call a dwelling, whether individual or served from a communal entrance. It shall allow a visitor to contact the requested dwelling within the particular system and/ or building, and hold a two-way simultaneous conversation between the visitor and occupant of the dwelling. It will allow the occupant to see and identify the visitor and their location, and will enable the occupant of the dwelling to remotely operate the electric locking device from their room terminal, thereby unlocking the communal entrance door(s) associated with the action and allowing the visitor access. Visitor door entry systems shall be easy to operate and understand and have the ability to display the image of the caller before the call is

answered, so the resident can choose whether to answer the call or not. Wherever a door entry system includes a dedicated camera which is separate from the door entry panel, the lens specified shall be of a fish-eye type in order to produce a wide panoramic or hemispherical image. The images from this camera system shall be recorded 24 hours a day, 7 days a week and should be stored for as long as is necessary. Occupants of the building must have unrestricted egress from the building in the event of an emergency or power failure.

- **Access control systems**

A proximity access control system provides electronic access through communal entrance doorsets. This is generally by use of a card or key fob issued to an occupant or person such as staff member, contractor or postal delivery service. It grants access to required areas via locked doors when the valid card or key fob is presented to a proximity reader fitted to the communal entrance doorset. Authorised access can be restricted to certain times of the day for some users.
The access control system will have the facility to record and identify the location, user, type, time and date of every system event. Sufficient memory storage must be available to store images for as long as is necessary, but not less that 30 days. The system will be fully programmable enabling control over permitted access with restrictions to nominated system controllers, who will be able to manage the system via remote access in order to expeditiously delete lost or stolen proximity cards or key fobs and any enrolled radio transmitters. Radio transmitters must have individual codes, such as those used by access cards or key fobs. Common code radio transmitters shall not be acceptable as they cannot be managed.
Proximity cards and key fobs must be security encrypted to protect against unauthorised copying and be sufficiently robust to avoid constant replacement during everyday use by the residents. High frequency cards or key fobs (13.56MHz) should be used in an encrypted mode, not reading a UID only. Low frequency cards or key fobs (125MHz) are not considered secure.

Internal bicycle parking for residents

Internal bicycle parking facilities will be accessed via a security, fire and smoke rated doorset. The bicycle parking facility shall be constructed of dividing walls that extend from floor to ceiling with no windows set in them. Bicycle parking access doors shall be fitted with emergency egress door furniture, on the inside face to facilitate emergency egress and so as to avoid locking people inside the store. Bicycle parking facilities shall be incorporated into any existing access control and monitoring systems.
Bicycle parking will comprise bicycle stands, anchor points, single and two-tier rack systems and dedicated lockers, etc. The bicycle stands and rack systems, single or two tier, shall be certified to one of the following minimum standards, or above:
STS 225 Issue 2 Burglar Resistance BR1(S), or

STS 205 Issue 8 Burglar Resistance BR1, or
STS 225 Issue 2 Burglar Resistance BR1(S), or
LPS 1175 Issue 8 Security Rating A1, or
Sold Secure SS104 Bronze, or
STS 501 Security Rating TR1, or
STS 503 Security Rating TR1

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.

Integral bin stores
Internal and external doorsets would benefit from being an integral part of the access control system. Internal crash bars are required to provide emergency egress from bin stores. The exit should be via the external doorset rather than through a doorset that leads back into the building. External bin store doorsets shall be fitted with automatic closers to prevent them from being left open and therefore the area insecure. Appropriate ventilation must be designed into this area to avoid doors being left open for this purpose.

Secure mail delivery
There are increasing crime problems associated with the delivery of post to buildings containing multiple dwellings or bedrooms. Therefore, mail delivery that compromises the security of residential areas of a multi-occupied building in order to deliver individually to each residence is not permitted. Facilities shall be provided that enable mail to be delivered to safe and secure areas such as described below.

Communal mail and parcel delivery facilities serving multiple flats must incorporate the following security measures:

- External delivery facilities shall be positioned adjacent to the entrance area
- Internal delivery facilities shall be positioned within an entrance area with access control
- Access control to this area shall have a data logging facility
- Both internal and external delivery areas shall be comprehensively covered by video surveillance
- Mail and parcel delivery boxes shall be equipped with high security cylinders that are not subject to master key access

- Mail and parcel delivery 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
- All delivery boxes must be installed in accordance with the manufacturer's specification.

Letter boxes certified to the Door and Hardware Federation's Technical Specification 009 (TS 009) offer reassurance that all of the above attributes have been met.

Lighting in communal areas within flats/ apartments
24-hour lighting (switched using a daylight sensor formally called photoelectric cells) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors, stairwells and all entrance/ exit points.

CCTV/ Video Surveillance Systems (VSS)
A VSS is not a universal solution to security problems but it does form part of an overall security plan. It can help deter crime and criminal behaviour, assist with the identification of offenders, promote personal safety and provide reassurance for residents and visitors. Even the smallest development will benefit from the installation of a good quality VSS, which does not need to be expensive.
It is important that signs are displayed explaining that video surveillance is in operation. The cameras should be contained in vandal resistant housings with the facility for ceiling or wall mounting; the images should be recorded in colour HD quality and stored for at least 30 days. The VSS should be complimented by and work with the site's lighting scheme.

CCTV systems shall comply with the requirements of BS EN 62676:2015 Video surveillance systems for use in security applications and where applicable BS 7958:2015 CCTV management and operation Code of Practice, and the requirements of the Data Protection Act and GDPR.

VSS cameras associated with visitor door entry systems covering communal entrances and internal lobby areas shall be installed and be capable of providing images of persons that are clearly identifiable on smaller devices such as smart phones.

CCTV systems shall be fitted by NSI/ SSAIB approved contractor.

Intruder alarms
Where an intruder alarm system is installed, it shall meet the requirements of BS EN 50131 (wired and wire free systems). All installations shall be in accordance with the current electrical regulations.

Information about Secured by Design

Secured by Design is a Police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice specified in SBD guides has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office.

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. It also has a significant impact on antisocial behaviour. Therefore, there are substantial carbon cost savings associated with building new homes to the SBD standard. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.

Secured by Design has three differing levels of security award:

- SBD Gold which incorporates the security of the external environment together with the physical security specification of the home
- SBD Silver which offers those involved in new developments, major refurbishment and the individual the opportunity to gain an award for the level of physical security provided
- SBD Bronze which offers a route to achieve a reasonable level of physical security for bespoke or refurbished properties where a traditional enhanced security product is not available, or cannot be utilised due to the listed building or other conservation status.

If you would like to apply for the Secured by Design award, please use the 'SBD Residential' application form found at www.securedbydesign.com.

Kind regards,

Agnes

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District