Consultee Comments for Planning Application 2025/91122

Application Summary
Application Number: 2025/91122
Address: Turnbridge Mills, Quay Street, Huddersfield, HD1 6QT
Proposal: Redevelopment of site for mixed-use E(g) (i, ii and iii) and B8 including: demolition of buildings and re-cladding of southern elevation of retained adjoining building; retention, conversion and renovation of existing mill/office/workshop/engine house building including alterations; erection of two new buildings; formation of two vehicular access points, service yard and parking areas; and other 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

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
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 11/06/2024 and 11/06/2025. The search criteria included burglary business and community, robbery, arson, criminal damage, theft of bicycle and vehicle crime (interference, theft of, theft from) for partial postcode area of HD1 6*.
This returned 150 offences: 2x arson, 43x burglary business, 20x robbery, 49x criminal damage, 5x theft of pedal cycle, 5x vehicle interference, 17x theft from vehicle, 9x 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 HD1 6* area between 11/06/2024 and 11/06/2025. This returned 70 incidents, 13 of which were in close proximity to the site.

Comments re submitted plans and documents

West Yorkshire Police have no objection in principle to this application. We respectfully request the inclusion of a PLANNING CONDITION for SECURITY MEASURES, in the interests of crime prevention and community safety.

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; the most significant include theft of plant equipment, materials, tools and diesel fuel. 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

Secured by Design recommends that single and multiple unit developments are contained within secure perimeters with access controlled entrances.

When boundaries are protected by fences, gates or barriers they shall be certified to one of the following minimum standards, or above:
LPS 1175 Issue 8 Security Rating B3, or
STS 202 Issue 12 Burglar Resistance BR2, or
Sold Secure SS323 Silver, or
LPS 1673 Issue 1 Attack Rating AR.A180.

The outside face of the fence and gates should be smooth, without footholds, to deter climbing. Fencing can also be fitted with anti-climb toppings; should they be hostile, appropriate signage must be displayed as per The Occupiers Liability Act 1984.
Care should be taken to avoid climbing aids in proximity of fencing/ walls/ gates such as trees, lamp columns or edges of other structures.

External waste storage
Waste and rubbish containers, particularly wheelie bins, can be repositioned 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.
In general, combustible materials shall not be stored within 10 metres of a building.

Cycle parking/ storage
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.

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 system. Easily accessible cameras and wiring should be placed in vandal-resistant housings 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.

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

Intruder alarm and security fogging devices
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.
If an immediate Police response is required, installers must meet the requirements of the National Police Chiefs' Council (NPCC) policy document – Guidelines on Police Requirements & Response to Security Systems are available at:
www.policesecuritysystems.com/national-police-chiefs-council-security-systems-policy
www.policesecuritysystems.com/secured-by-design-alarm-standard
Intruder alarm should be installed by NSI/ SSAIB approved contractor.

Security fogging devices can be incorporated within the intruder alarm system to disorientate the intruder when the alarm system is activated. They must conform to BS EN 50131-8:2019 (Alarm systems. Intrusion and hold-up systems - Security fog devices).

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.

Internal lighting
It is recommended that most internal office lighting is operated by detection devices which will automatically switch lights on and off due to movement or the absence of movement in each room. Apart from being a considerably more efficient method for reducing energy consumption (does not require a deliberate and remembered action by the user), such a system will identify the presence and progress of intruders in the building when it is closed. It therefore follows that the controlling mechanisms for the system shall be contained securely.
In critical movement areas, such as corridors and staircases, the use of two stage lighting (a constant low-level lighting level supplemented by activity switched lighting mode) may be utilised.
Emergency lighting will be required when there is a mains supply failure to ensure continued on-site safety and security. BS EN 1838 specifies the escape and standby lighting requirements for businesses in the event of a power failure.

Automated access control systems
Automated access control systems (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. The system should have a data logging facility, comply with UL293 and be installed by NSI/ SSAIB approved contractor.
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.

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.

With newbuilds, roller shutters should be integrated into the fabric of the building.

Lift security

BS EN 81 is a multi-part document detailing safety rules for the construction and installation of passenger lifts and passenger goods lifts.

Roof design and lightweight wall construction

Unauthorised access to roofs can make a range of crimes from burglary to arson easier to commit. External rainwater pipes can be used for climbing and shall be specified as square or rectangular in section, be fitted flush against walls or within wall cavities or covered recesses. Pipes shall be made of fire-resistant material with bends and horizontal runs kept to a minimum; existing roofs can be fitted with an appropriate obstructive barrier to prevent access. Designers shall take care not to inadvertently create climbing aids to upper windows and flat roofs via structures such as boundary walls, living walls, other adjacent buildings, handrails or external staircases.

Roofing systems 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

Lightweight wall systems shall be installed by approved contractors, in compliance with the manufacturer's instructions and shall be certified to one of the following minimum standards, or above (listed alphanumerically):
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

Comms/ server room security

Consideration must be given to the structure of the internal walls, floors and ceilings of computer server rooms to provide appropriate security and to prevent damage by fire, smoke or from fire fighting (water) from other parts of the building. Due to varying

construction methods and materials it is not possible to be prescriptive, however combinations of different materials, such as high impact gypsum boards, expanded metal sheets, plywood, and masonry have proved to be effective.

An internal doorset to a server room should 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+

Where it is impractical to secure a room housing a computer server, there are two alternative solutions, i.e. secure cabinets for individual computers or small server units, and security caging for large or multiple servers. These products should be certified to Sold Secure SS314 Gold, LPS 1175 Issue 8 Security Rating B3+ or STS 202 Issue 12 Burglar Resistance BR2.

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+
In newbuilds, roller shutter doors should be integrated into the fabric of the building.

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.

From a Secured by Design perspective, doorsets and windows must meet the security requirements of either PAS 24, STS 201, STS 204, LPS 2081, LPS 1175, STS 202 or LPS 1673 and be able to survive many cycles of repeated use.

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

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 should be alarmed to prevent them being left open for ventilation or regularly used as part of a shortcut route for staff.

The primary entrance doorset shall be fitted with a multi-point locking system that meets the requirements of:
PAS 3621:2011 (key locking both sides), or
PAS 8621:2011 (non-key locking on the internal face), or
PAS 10621:2011 (non-key locking on the internal face – with an external locking override facility).
Electronic locks for a primary doorset should be certified to one of the following minimum standards:
BS EN 14846:2008, or
BS EN 16867:2020+A1:2021, or
TS621:2018.
Electronic locking systems that form part of the access control system and are controlled by access codes and key cards, etc. shall not prevent emergency egress.

Locking mechanisms incorporating cylinders (Euro or oval profile) in doorsets and gates must be certified to BS EN 1303:2015. The minimum requirements are:
Key related security (Digit 7): Grade 5
Attack resistance (Digit 8): Grade A (3/5 minute resistance against drilling)
Durability (Digit 2): Grade 5 (50,000 cycles)
In addition to the above requirement, the cylinder certification scheme must include cylinder 'snapping' and 'anti-bump' assessments (DHF TS 007).
Doorsets designated as 'emergency' or 'panic' exits must be fitted with the hardware appropriate to the specific use:
BS EN 179:2008 (Emergency exit devices)
BS EN 1125:2008 (Panic exit devices)
BS EN 13637:2015 (Electronically controlled exit systems).

Further advice on doorset hardware and locking systems from a suitably qualified locksmith is available at https://www.locksmiths.co.uk.

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

Easily accessible is defined 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.

Windows must meet the requirements of the Building Regulations with regard to safety glazing and emergency egress.

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 P1A 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).
For this site, I would recommend class P2A or above.
Easily accessible definition as per previous paragraph.

Occasionally, when large laminated glazed panels are used on south facing elevations, there have been incidents of glazing failure, or cracking, due to thermal stress. Whilst the use of toughened glass would seem to be a simple solution to the problem of thermal stress, ordinary toughened glass offers no security resistance. It is therefore recommended that the inner pane of glass used in a double glazed unit is 'laminated toughened'. This combination of the two sheets of toughened glass and the interlayer offers both resistance to intrusion and thermal stress associated with large glazed areas.

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, in the '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