Consultee Comments for Application 2025/91185

Application Summary
Application number: 2025/91185
Location: Chapel Lane, Moldgreen, Huddersfield, HD5 9BG
Proposal: Demolition of redundant engineering building and erection of student accommodation block
Planning Officer: Louise Bearcroft

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, robbery, 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 / antisocial 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 WYP crime data and mapping tool. The search covered offences committed between 08/07/2024 and 08/07/2025 and included residential burglary, robbery, arson, criminal damage and theft of pedal cycle in Moldgreen area. This returned 36 results: 8x residential burglary, 3x robbery, 0x arson, 25x criminal damage (3x non-dwelling, 8x dwelling, 8x motor vehicle, 6x non-specific), 0x theft of pedal cycle.

Residential burglary- 6 of the offences related to dwellings, 2 to sheds. Amongst the dwellings, 3 properties were entered by suspect/s attacking the door or its hardware while the other 3 were left insecure. Entry to both sheds was effected by breaking off the locks. Portable electronics and cash were stolen repeatedly.

Criminal damage- damage to glazing featured repeatedly.

Robbery- nothing apparently of note for this application.

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 Moldgreen area between 08/07/2024 and 08/07/2025. This produced 14 results, 4 of which were recorded in the

vicinity of the site. These related to 2 reports of nuisance youths, student-related noise nuisance and a customer refusing to leave commercial premises nearby.

Site review

West Yorkshire Police have no objection in principle to this application. However, I have concerns about the issues identified in Site Review above and would like the applicant to make serious efforts to mitigate these.
Therefore, West Yorkshire Police respectfully request the inclusion of a PLANNING CONDITION for SECURITY MEASURES for this site, 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.

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.

Climbing aids
Boundary walls, bins, fuel stores, meter boxes, street furniture, trees, low flat roofs, car ports or balconies shall be designed and located so that they do not provide climbing aids into the property.

Access gates to rear gardens
Gates to the side of dwellings 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 (for this site, a proximity reader utilising cards or key fobs would be preferred). Gates should be self-closing. Occupants must have unrestricted egress in case of fire/ emergency.
Pedestrian gates shall be of a framed design and employ galvanised or stainless steel adjustable hinges and fixings mounted behind the attack face as well as anti-lift hinges.

Side and rear boundaries
Vulnerable areas, such as side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. The fencing must be capable of raking/ stepping to compensate for changes to surface levels and to maintain the overall height over different terrain.
There may be circumstances where more open fencing is required to allow for greater surveillance. Trellis topped fencing can be useful in these circumstances to increase the height of the boundary and make it more difficult to climb over.

Planting
Planting shall not impede the opportunity for natural surveillance and wayfinding, and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs shall be selected to have a mature growth height no higher than 1m, and trees shall have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision.
Attention shall be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property or obscure lights or CCTV cameras.

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

- **Visitor door entry system**

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.

- **Access control system**

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 system should 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 than 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.

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.

The system is required to meet the standard of UL 293 and be installed by NSI/ SSAIB approved contractor.

Occupants of the building must have unrestricted egress from the building in the event of an emergency or power failure.

Secure bicycle storage
Where sheds are provided for bicycle parking, they shall be certified to Sold Secure SS301 Bronze, or above and securely fixed to a suitable substrate foundation in accordance with the manufacturers' recommendations.

External bicycle parking facilities shall 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:
Sold Secure SS104 Silver
LPS 2081 Issue 1 Security Rating B
STS 225 Issue 2 Burglar Resistance BR2(S)
STS 205 Issue 8 Burglar Resistance BR2
LPS 1175 Issue 8 Security Rating B3
STS 501 Security Rating TR2
STS 503 Security Rating TR2

The bicycle stores require to be well-lit in the hours of darkness and covered by CCTV.

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.

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
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.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
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.

The term 'doorset' refers to a door, frame, locks, fittings and glazing as one combined unit.
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, French doors, bi-fold or sliding patio doorsets, dedicated private flat or apartment entrance doorsets, communal doorsets) shall be certified to one of the following minimum standards, or above:
PAS 24:2022
PAS 24:2022+A1:2024
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.
Thumbturn locks are required on all flat doors to assist with swift egress in case of fire/ emergency.

Any glazing within PAS 24 or STS 201 certified doorsets, including glazed panels/ windows adjacent to doors installed within an integral door frame and windows adjacent to doorsets (within 400mm), must incorporate one pane of laminated glass certified to BS EN 356:2000 Class P1A, or above. This is a specific requirement within PAS 24, which is referenced within the GB Building Regulations. This is not necessary for doorsets certified to LPS 2081, STS 222, LPS 1175, STS 202 or LPS 1673 as glazing security requirements are significantly more stringent within these standards, even at the lowest levels. However, if there is a separate adjacent window assembly, the glazing must be certified to BS EN 356:2000 Class P1A, or above.

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 windows, roof lights and roof lanterns) shall be certificated to one of the following minimum standards, or above:
PAS 24:2022
PAS 24:2022+A1:2024
STS 204 (certified to PAS 24:2022+A1:2024)
LPS 2081 Issue 1 Security Rating A
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.A60

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. If the Fire Safety Officer accepts locking hardware as part of the designated fire escape route, then fire resistant glass may be required.
Applicant is to consider installing lockable hardware or opening restrictors on windows located on upper floors in the interests of safety.

Laminated glass certified to BS EN 356:2000 Class P1A or above, is required in the following areas:

- any window located within 400mm of a doorset (to ensure the integrity of the locking system)
- easily accessible emergency egress windows with non-lockable hardware (a requirement of PAS 24)
- easily accessible roof lights and roof lanterns with non-lockable hardware.

Alternatively, if the window is tested and accredited to LPS 2081, LPS 1175 or LPS 1673, it must be supplied complete with the glass approved (see LPS certification documentation) for use within that window.

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.

Glazed curtain walling and window walls
SBD recognises four distinct types of glazed wall systems. These are:
i Large glazed units connected by a 'spider clamp' system
ii Glazed units directly retained within a framing system (usually aluminium)
iii Framed windows installed within a separate framing system
iv Framed windows connected to other framed windows to create a 'window wall'.

Glazed curtain walling (i and ii above) must be installed using a secure glazing retention system. This may be achieved by utilising the specific glazing retention test within PAS 24 or by an indicative test on the retention system certified to one of the following minimum standards, or above:
LPS 2081 Issue 1 Security Rating A
LPS 1175 Issue 8 Security Rating A1
STS 202 Issue 12 Burglar Resistance BR1
LPS 1673 Issue 1 Attack Rating AR.A60

Easily accessible glazing shall incorporate one pane of laminated glass certified to BS EN 356:2000 Class P1A, or above. Easily accessible definition as per previous section.

Private external lighting
Where possible, the lighting requirements within BS 5489-1:2020 shall be applied. Lighting is required to illuminate all elevations containing a doorset, car parking/ garage areas and footpaths leading to dwellings and blocks of flats. Bollard lighting should be avoided due to low light spill and vulnerability to criminal damage.

External public lighting must be switched on using a photo electric cell (dusk to dawn) with a manual override. If LED light sources are used, then shorter burning hours can be programmed as no warm-up time is required for the lamp. The use of light-emitting diode (LED) light sources is recommended with a colour temperature of no more than 4000 Kelvin and ideally below. This reduces blue light content and therefore the effects on human and ecology receptors.

Lighting in communal areas within flats/ apartments

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

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:

- Internal delivery facilities shall be positioned within an entrance area with access control
- Access control to this area shall have a data logging facility
- The delivery area 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.

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 and landscaping schemes.

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 smartphones.

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. Developers are reminded that if images of public space are visible and recorded, there may be a legal responsibility to register the system with the Information Commissioner's Office- https://www.ico.org.uk.
CCTV system should be installed by NSI/ SSAIB approved contractor.

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,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District