

Consultee Comments for Application 2025/91579

Application Summary

Application number: 2025/91579

Location: The Homestead, Hurst Knowle, Almondbury, Huddersfield, HD5 8SG

Proposal: Demolition of the former Homestead care home and erection of 28 dwellings, comprising 20 apartments and 8 bungalows, with access from Hurst Knowle and associated external works including landscaping

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 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 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 properties, by exploiting vulnerabilities in the built environment and poor physical security measures.

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 in the locality:

I have conducted a search using the WYP crime data and mapping tool. The search covered offences committed between 01/09/2024 and 01/09/2025 and included residential burglary, arson, criminal damage, robbery, theft of pedal cycle, theft of motor vehicle, theft from motor vehicle and vehicle interference in Almondbury area. This returned 141 results: 36x residential burglary (32x dwelling, 4x non-dwelling), 6x arson, 47x criminal damage (5x non-dwelling, 21x dwelling, 11x motor vehicle, 10x non-specific), 4x robbery, 2x theft of pedal cycle, 9x vehicle interference, 20x theft from vehicle and 17x 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 Almondbury area between 01/09/2024 and 01/09/2025. This produced 69 results, 8 of which were recorded in close proximity of the proposed development.

These related to repeated reports of nuisance youths (setting fires, banging on doors, kicking a football into a private garden) as well as motorcycles speeding and riding dangerously.

West Yorkshire Police have no objection in principle to this planning application. We respectfully request the inclusion of a PLANNING CONDITION for SECURITY MEASURES should the application be approved; this is to include: external doorsets and easily accessible windows to be certified to PAS 24:2022 or above, CCTV plan, lighting scheme, boundary treatments and cycle store. This is especially important due to identified acquisitive crime and ASB risks in the area as well as the vulnerability of proposed occupants.

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 of a development; the most significant include theft of plant equipment, materials, tools and diesel fuel. Security should be considered throughout the life cycle of the development and in place prior and during the construction phase (inclusive of pre-enablement works). 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, meter boxes, street furniture, trees, etc. should be designed and located so that they do not provide climbing aids into the property.

Boundaries

Open spaces must have features which prevent unauthorised vehicular access.

Boundary security measures and features should strongly and clearly define the public, communal, semi-private and private spaces.

Vulnerable areas, such as exposed side and rear gardens, need more robust defensive

barriers by using walls or fencing to a minimum height of 1.8m. There may be circumstances where more open fencing is required to allow for greater surveillance.

Trellis topped fencing can be useful in such circumstances, to increase the height of the boundary and make it more difficult to climb over. The outward face of the fence must be smooth, without cross members or footholds to deter climbing and use as informal seating.

Sub-divisional boundaries are also required to be 1.8m high to achieve security, demarcation and privacy. Again, trellis topping can be utilised here (1.5m solid fence + 30cm of trellis topping).

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 capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb over, crawl under or removed from their hinges.

Perimeter fencing and gates

Fencing and gates shall be at least 1.8m in height and certified to one of the following minimum standards or above:

LPS 1175 Issue 8 Security Rating A1

STS 202 Issue 12 Burglar Resistance BR1

Sold Secure SS323 Bronze

LPS 1673 Issue 1 Attack Rating AR.A60

Vehicle parking

Parking bays should benefit from good natural surveillance, for example being overlooked by the clear windows of active rooms.

A parking bay surrounded by vegetation or other obstructions (such as utility boxes) may provide cover for suspects to interfere with vehicles. Encroaching or uncontrolled undergrowth can hinder natural surveillance, restrict access for the car user, impact on the fall of light from nearby columns and can also hinder any video surveillance coverage. Shrubs shall be selected to have a mature growth height no higher than 1 metre; trees shall have no foliage, shoots or lower branches below 2m thereby allowing a 1-metre clear field of vision.

EV charging points should be overlooked and designated for use by persons linked to the site only- staff, residents and their visitors.

Communal parking facilities must be lit to the relevant levels as recommended by BS 5489-1:2020. Luminaires shall be vandal resistant and not mounted below 2.5m from the ground and out of reach for those wishing to cause interference. Bollard lighting should be avoided- it can be easily obscured or damaged and produces light spill at low level which impedes the recognition of facial features.

Where parking bays are monitored by video surveillance, an identifiable facial image is a basic necessity. Video surveillance systems (VSS) and signage shall be General Data Protection Compliant (GDPR) compliant. Further advice is available at:

<https://www.ico.org.uk>

Street lighting

All street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks must comply with BS 5489-1:2020.

SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be

avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features.

Trees shall not be planted within 5 metres of a light source, as the branches can cause damage or reduce the effectiveness of the light.

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 area and footpaths leading to the building. 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.

Bollard lighting should be avoided, as explained in the previous section.

Overall Lighting uniformity (U_o) – levels of 0.4 or 40% – are recommended where possible to ensure that lighting installations do not create dark patches next to lighter patches where the human eye has difficulty in adjusting quickly enough to see that it is safe to proceed along any route. If high levels of uniformity are neither achievable nor appropriate for technical or locally applying environmental reasons, the highest levels of uniformity possible shall be achieved.

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 is 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.

Additional information for buildings containing multiple dwellings or bedrooms

It should be noted that regardless of the size of any development, where dwellings are inclusively designed to provide accessible housing, consideration must be given to disabled and older residents. Such residents may require additional access features such as full automation via remote key fob to enable independent entry through all doors to the building, car parks, communal areas, etc. Consideration must be given to a disabled person's ability to operate heavy doors and/or reach controls or wall mounted fobs.

Communal entrance doorsets that serve 11 dwellings or more, are required to have a visitor door entry system and an access control system to enable management oversight of the security of the building.

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- unless access will be solely managed by support staff onsite.

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 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. 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.

In the event of a power failure door locks shall revert to a safe (unlocked) mode unless there is a fire evacuation policy in place that requires doors to remain locked, such as that operated within some care homes.

Access control system should be compliant with UL 293 and be installed by NSI/ SSAIB approved contractors.

Cycle storage

Should the bicycle parking be located internally- bicycle stands and single or two-tiered rack systems should be certified to Sold Secure SS104 Bronze as a minimum. The store's doorset should be subject to access control. Access doors should be fitted with emergency egress door furniture on the inside face to facilitate emergency egress and so as to avoid locking people inside.

Should the bicycle parking be located externally, bicycle stands should be certified to Sold Secure SS104 Silver at the minimum, overlooked, well-lit and covered by CCTV.

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

Please note:

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 approved installers who received appropriate training.

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 and rear doors, French doors, bi-fold or sliding patio doorsets, dedicated private flat or apartment entrance doorsets, communal doorsets, shall be certificated 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+

The responsibility for the specification and location of fire and smoke rated security doorsets lies with the developer or the developer's agent Responsible Person.

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).

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

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.

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 occupant 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.

Secure mail delivery

There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and 'fishing' for personal items (which may include post, vehicle and house keys, credit cards). SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the

requirements of the Door and Hardware Federation's Technical Specification 009 (TS 009). The letter box must be securely fixed to the face of the building in accordance with the manufacturers specifications and be located in a position that benefits from natural surveillance.

CCTV/ Video Surveillance Systems (VSS)

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.

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. 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 National Security Inspectorate (NSI) or Security Systems and Alarms Inspection Board (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