

Dear Nicole,

Re: 2025/92092- Change of use from dwelling (use class C3) to residential care home (use class C2) at 81 George Avenue, Birkby, Huddersfield, HD2 2BJ

Thank you for your request for consultation. 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 comments and 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)

The Children's Homes (England) Regulations 2015

<https://www.legislation.gov.uk/ukxi/2015/541/contents>

West Yorkshire Police Missing Persons - Force Policy

<https://www.westyorkshire.police.uk/about-us/policies-and-procedures/policies/crime-and-safeguarding/missing-persons>

I have reviewed the application and supporting documentation available via the Planning Portal. I have also liaised with relevant internal partners.

Huddersfield Neighbourhood Policing Team advised George Avenue is a narrow street which is heavily congested with vehicles, therefore parking is an issue. The letter from applicant relating to a driveway extension is shown as a superseded document so I am unsure if this will be going ahead; it would assist with congestion issues if so.

I note that the home is Ofsted-registered. The proposal is to accommodate up to 2 young people, each supported by 2 members of staff.

The application form cites proposed employees as 2x full-time and 1x part-time which does not appear sufficient given the above information; however, I appreciate this may be an error as the Management Plan reiterates that 2 staff and a manager would typically be present at all times.

Security provisions are noted and supported.

With regard to the CCTV system- images should be stored for at least 30 days. Staff onsite should be trained to operate the system and download the footage in case it is required urgently. The system should 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>. It should be installed by National Security Inspectorate (NSI) or Security Systems and Alarms Inspection Board (SSAIB) approved contractor. The CCTV system should work with the property's external lighting and landscaping to ensure appropriate coverage and mitigate blind spots.

Should young persons' bedroom doors be lockable, thumbturn locks are recommended. These must have an override facility on the external face so care staff can effect entry in case of emergency or immediate concern for welfare of the young person.

Opening restrictors or lockable hardware will be required for non-accessible windows (above ground floor) for child safety.

For more information on security of a residential property, please refer to Secured by Design's Residential Guide 2025

(<https://www.securedbydesign.com/images/RESIDENTIAL%20GUIDE%202025%2027325.pdf>) and Approved Document Q

(https://assets.publishing.service.gov.uk/media/5a8016a8ed915d74e622c659/BR_PDF_AD_Q_2015.pdf).

The applicant is strongly encouraged to familiarise themselves with West Yorkshire Police's Missing Persons Policy: <https://www.westyorkshire.police.uk/about-us/policies-and-procedures/policies/crime-and-safeguarding/missing-persons>

West Yorkshire Police have no objection to this application.

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District