

23/09/2025

Dear Jennifer,

**Re: 2025/92385- Change of use from dwelling (C3) to children's home for up to 4 children at 66 Carlinghow Hill, Upper Batley, Batley, WF17 0AG**

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](http://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>

Children who go Missing from Care Framework

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publication-s-log/national-crime-coordination-committee/2023/children-who-go-missing-from-care-framework.pdf>

I have reviewed the application and supporting documentation available via the Planning Portal. I have also conducted pertinent checks on Police databases and liaised with relevant internal partners.

The proposal is to accommodate up to 4 young persons aged 7-18.

The application form states 4 full-time employees are proposed which appears incorrect given staffing levels outlined in the Management Plan (p.3- "at least 1 member of staff per child", as well as a manager).

No number of overnight staff is specified within the Management Plan. I would expect at least 2 staff to be present. If one or more children fail to return at curfew time, staff will be responsible for locating and bringing them home in the first instance, unless there are immediate concerns for the child's safety or wellbeing. This is outlined within the Children who go Missing from Care Framework as well as WYP's Missing Persons Policy. This must be taken into account within the home's operational requirements.

I note the remarks in relation to access control and alarms on external doors- this is supported.

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

Cycle stands should be rated to Sold Secure Silver due to being located outside. Bin enclosure should be lidded and locked when not in use to prevent the bins from being utilised as climbing aids.

The installation of external CCTV is recommended. 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. Staff onsite should be trained to operate the system and download the footage in case it is required urgently. Images should be stored for at least 30 days.

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](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