

# Consultee Comments for Application 2025/92787

## Application Summary

Application number: 2025/92787

Location: Ingfield Business Centre, Cherry Nook Road, Deighton, Huddersfield, HD2 1JD

Proposal: Change of use of existing building from class E(g) to Class C3 residential for 7.no dwellings, first floor extension, insertion of new door and window openings and associated alterations. Construction of bin store, associated external landscaping, parking and associated alterations.

Planning Officer: Kerri Simpson

## 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](http://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 16/11/2024 and 16/11/2025 and included residential burglary, arson, criminal damage, robbery, theft of motor vehicle, theft from motor vehicle and vehicle interference in Deighton area. This returned 72 results: 7x residential burglary (6x dwelling, 1x non-dwelling), 4x arson, 42x criminal damage (2x non-dwelling, 22x dwelling, 11x motor vehicle, 7x non-specific), 4x robbery, 2x vehicle interference, 6x theft from vehicle and 7x 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 Deighton area between 16/11/2024 and 16/11/2025. This produced 25 results, 3 of which were recorded in close proximity to the proposed development. 2 of these related to nuisance youths.

Site review

**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, 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 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.

### **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.

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 should comply with BS 5489-1:2020. SBD does not advocate the use of bollard lighting. 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 dwellings. 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<sub>o</sub>) – 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.

### **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 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).

A door chain or opening limiter meeting the requirements of the Door and Hardware Federation Technical Specification 003 (TS 003) should be installed on the doorset to which a caller can be expected, normally the front door. A door viewer meeting the requirements with the Door and Hardware Federation Technical Specification 002 (TS 002) standard should be fitted between 1200mm and 1500mm (in addition to 1050mm

for wheelchair accessible dwellings) from the bottom of the door, this is not required if the doorset is installed with clear glazing or if there is a side panel with clear glazing.

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 manufacturer's 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.

### **Intruder alarm**

Where an intruder alarm system is installed, it shall meet the requirements of BS EN 50131 (wired and wire free systems). All installations shall be in accordance with the current electrical regulations. Intruder alarms should be installed by NSI or SSAIB approved contractor.

Should the applicant not wish to provide intruder alarms as standard, it is recommended that a 13-amp spur point is installed in each property so the occupants can have it fitted if they so choose.

## **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](http://www.securedbydesign.com).

Kind regards,

Agnieszka Boryn  
Designing Out Crime Officer  
Kirklees District