Consultee Comments for Application 2025/92882

Application Summary
Application number: 2025/92882
Location: Cellars Clough Mill, Manchester Road, Marsden, Huddersfield, HD7 6LY
Proposal: Erection of 75 dwellings with associated parking, infrastructure, hard and soft landscaping and access from Manchester Road
Planning Officer: Farzana Tabasum

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. 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.

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 and issues of note in the locality:

I have conducted a search using the WYP crime data and mapping tool. The search covered offences committed between 01/12/2023 and 01/12/2025. The search criteria included burglary residential, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for Marsden area.

This returned 86 results: 3x arson, 13x burglary residential (11x home, 2x unconnected building), 3x robbery, 26x criminal damage (1x non-dwelling, 1x dwelling, 7x motor vehicle, 17x non-specific), 5x vehicle interference, 6x theft from vehicle, 30x 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 Marsden area between 01/12/2023 and 01/12/2025. This produced 55 results, 1 of which was in the vicinity of the proposed development. This related to nuisance motorcycles riding on the canal towpath.

West Yorkshire Police have concerns with regard to this proposal and request further information from the applicant in response to the comments outlined below.

Recommended security measures, supported by SBD Residential Guide 2025:

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. 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.

Boundaries

Boundaries between public, semi-private and private spaces should be clearly defined. For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1m) and railings or timber picket fence if a more substantial front boundary is required.

Front garden planting of feature shrubs and suitable trees will also be acceptable provided they are set back from paths and placed to avoid obstructing visibility of doors, windows and access gates to the rear of the property. Similarly, planting which allows a clear line of sight to the pavement and road is preferable.

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.

Climbing aids

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

Landscaping/ vegetation

Planting should 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 should be selected to have a mature growth height no higher than 1m, and trees should have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance. As a general rule, building frontages should be open to view except, for example, houses standing in their own private grounds. Attention should 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.

Vehicle parking

Vehicles should either be parked in locked garages or on a hard standing within the dwelling boundary.

Where dedicated garages are provided within the curtilage of the dwelling, the entrance should be easily observed from the street and neighbouring dwellings.

Where parking is designed to be adjacent to or between units, a gable end window should be considered to allow residents an unrestricted view over their vehicles.

Parking bays should ideally benefit from good natural surveillance, for example being overlooked by the clear windows of public buildings and private dwellings. A location with good footfall is also desirable, to ensure there are sufficient people nearby who may notice suspicious activity and contact police.

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.

Bollard lighting should be avoided- it does not project sufficient light at the right height, making it difficult to recognise facial features. It can also be easily obscured or damaged.

Trees may restrict the performance of street lighting by blocking light or causing damage through collision with branches and should not be located within 5 metres of a lighting source. Account must be taken of the effects of seasonal variations on planting during the design stage.

The Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons.

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.

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 shall be certificated to one of the following minimum standards, or above:
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+

Easily accessible is defined within Approved Document Q Appendix A:
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.

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. The above requirement 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.

A door chain or opening limiter meeting the requirements of the Door and Hardware Federation Technical Specification 003 (TS 003) must be installed on the doorset to which a caller can be expected, normally the front door (see Approved Document Q, Section 1: Doors, paragraph 1.4). All such devices shall be suitable for the door material to which they are fitted and be installed in accordance with the manufacturer's recommendations.

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+A1:2024, or

STS 204 (certified to PAS 24:2022+A1:2024), or
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.
Windows that are not easily accessible will require either lockable hardware or an opening restrictor in the interests of child 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.

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, or
STS 222 Issue 4 Burglar Resistance BR1(S), or
LPS 1175 Issue 8 Security Rating A1, or
STS 202 Issue 12 Burglar Resistance BR1, or
LPS 1673 Issue 1 Attack Rating AR.A60

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).

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 (including patio doors), car parking areas and footpaths leading to dwellings.

Bollard lighting 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.

Lighting systems enabled by PIR motion sensors are NOT recommended by West Yorkshire Police due to the lack of operational consistency and their proneness to criminal damage. They can also be a causal factor in neighbour disputes due to the lights flashing on and off as well as allow an offender an opportunity to work undetected for the same reason.

Overall Lighting uniformity (Uo) – 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.

External public lighting must be switched 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.

Video Surveillance Systems (VSS)/ CCTV

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 CCTV is in operation.

A CCTV system should:

- have CCTV cameras contained in vandal resistant housings with the facility for ceiling or wall mounting

- record images in colour HD quality
- not be affected by concentrated white light sources directed at the camera, such as car headlights and street lighting
- provide suitable methods of export and incorporate the required software to view the exported footage
- not be negatively impacted by lighting/ landscape proposals
- be of good quality to produce viable images and videos should an incident occur.

Ideally, CCTV systems should be monitored live 24/7 giving the ability to react to a situation as it occurs. However, in case of residential developments, most CCTV systems are designed for recording images and for the post event investigation only which is acceptable.
West Yorkshire Police recommend that images are stored for a minimum of 31 days.

Further advice, including the ICO CCTV Code of Practice is available at: www.ico.org.uk.

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.

The system should be installed by NSI/ SSAIB approved contractor.

Intruder alarms
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.
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.

Intruder alarms should be installed by NSI/ SSAIB contractor.

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

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District