Consultee Comments for Application 2025/93126

Application Summary
Application number: 2025/93126
Location: The Coach & Horses, Eastgate, Honley, Holmfirth, HD9 6PA
Proposal: Demolition of rear block, erection of rear extensions and alterations to existing building to form 9.no apartments including associated works and alterations (within a Conservation Area)
Planning Officer: John Holmes

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 08/12/2024 and 08/12/2025. The search criteria included burglary residential, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for the area of Honley.

This returned 43 results: 0x arson,14x burglary residential (14x home, 0x unconnected building), 1x robbery, 13x criminal damage (1x non-dwelling, 5x dwelling, 3x motor vehicle, 4x non-specific), 2x vehicle interference, 4x theft from vehicle, 9x 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 Honley area between 08/12/2024 and 08/12/2025. This produced 64 results, 4 of which were recorded in the vicinity of the proposed development. 2 of these related to nuisance motorcycles, 1 to bad parking. The remaining report is not of relevance to the proposed development.

West Yorkshire Police have no objection in principle to this 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:

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.

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. 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.

Gates

Pedestrian gates shall be of a framed design and employ galvanised or stainless steel adjustable hinges and fixings mounted behind the attack face. On outward opening gates, where the hinges/brace is mounted on the attack face, fixings shall be of a galvanised or stainless steel coach bolt design. Hinge systems must not allow the gate to be 'lifted off' and therefore shall employ a method to restrict the removal of the gate from the fence post or wall. Gates must be capable of being locked and ideally self-closing in the interests of road safety.

Where entrance/ driveway gates are required they should ideally, be inward opening, of substantial framed construction and employ galvanised or stainless steel adjustable hinges and fixings mounted behind the attack face. Hinge systems must not allow the gate to be 'lifted off' and shall employ a method to restrict the removal of the gate from the adjoining fence post or wall. Gates shall be fitted with a galvanised or stainless steel drop bolts and facility for dedicated gate locking systems, padlocking (manual gates) or electro-mechanical locking (automated gates) and employ mechanical/ electro-mechanical devices as applicable to hold gate leaves in the open position.
A gate should not be capable of falling through single point failure, such as one hinge breaking. Gate Safe (a registered charity, founded specifically to improve the standard of safety for the installation and maintenance of automated gates and barriers) recommend that gates have three hinges, although a suitably sized tether for the size of the gate could be used to prevent the gate from falling if the hinge fails. In the event that a gate has an inverted hinge to prevent it being lifted off the post, two tethers must be fitted to the top and bottom of the gate, as an inverted hinge is no longer load bearing. Further information is available at: https://www.gatesafe.org or BS EN 12604.
Automated gates supplied and installed must meet the relevant statutory safety standards and be UKCA or CE marked accordingly. Installers of powered gates must be appropriately qualified, trained and follow recognised industry guidance that also allows for accessibility and ease of operation.

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.

Communal doorset and all doorsets allowing direct access into the home 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+

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.

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 (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
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

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
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

Access control system
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. Data should be stored for at least 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. High frequency cards or key fobs (13.56MHz) should be used in an encrypted mode, not reading a UID only. Low frequency cards or key fobs (125MHz) are not considered secure.

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 secure external letter boxes meeting the requirements of the Door and Hardware Federation’s Technical Specification 009 (TS 009). This would likely be the safest solution for the proposed development.

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 and garage 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.

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 will be 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.
Technology exists in respect of energy efficient light dimming systems and other means of ensuring that security lighting is intelligently provided in the right quantities and only at the right time.

External bicycle parking
External bicycle parking facilities shall be designed for secure storage using bicycle lockers, hangers or dedicated storage devices and shall be certified to one of the following minimum standards, or above:
LPS 2081 Issue 1 Security Rating B
STS 225 Issue 2 Burglar Resistance BR2(S)
STS 205 Issue 8 Burglar Resistance BR2
LPS 1175 Issue 8 Security Rating B3
Sold Secure SS104 Silver
STS 501 Security Rating TR2
STS 503 Security Rating TR2

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. 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.

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