

Consultee Comments for Planning Application 2025/93394

15/01/2026

Application Summary

Application Number: 2025/93394

Address: Rowley Mills, Penistone Road, Fenay Bridge, Huddersfield, HD8 0LE

Proposal: Erection of 3 storey front extension and 2 storey rear extension of Rowley Mills with associated car park amendments, ancillary structures and landscaping; first floor roof extensions, car park amendments and landscaping at International House with new access infrastructure and pedestrian crossing facility

Case 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 Local Plan <https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf>

Secured by Design www.securedbydesign.com

Crime Prevention Through Environmental Design (CPTED)

Security Overlay to the RIBA Plan of Work

https://www.securedbydesign.com/images/Security_Overlay_to_RIBA_Plan_of_Workpdf.pdf

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 crime and incident information listed below.

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 WYP crime data and mapping tool. The search covered offences committed between 13/01/2025 and 13/01/2026. The search criteria included burglary business and community, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for the area of partial postcode HD8 0*.

This returned 64 offences: 2x arson, 5x burglary business, 30x criminal damage (11x dwelling, 9x vehicle, 10x non-specific), 4x vehicle interference, 8x theft from vehicle, 15x 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 HD8 0* area between 13/01/2025 and 13/01/2026. This returned 44 incidents, 1 of which was within proximity to the premises. This report is not of relevance to the application in question.

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 line with the below recommendations.

Should more advice be required, the applicant can contact me directly or refer to the Secured by Design Non-Residential Guide 2025 (<https://www.securedbydesign.com/images/NON%20RESIDENTIAL%20GUIDE%202025%203425.pdf>) in the first instance.

Recommended security measures, supported by the SBD Non-residential Guide 2025:

Please note national standards and specifications are often updated, please ensure that the latest version of the security standards and specifications specified in this document are adhered to.

Construction phase security

Unfortunately, there are many crimes which occur during the construction phase (including enabling works) of a development. Secured by Design recommend that security should be considered throughout the life cycle of the development and be in place prior and during the construction phase. 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.

CCTV/ VSS

Although video surveillance systems (VSS) are not a solution to all security problems, they can help deter criminals and assist with the identification of offenders after a crime has been committed. If a VSS has a recording facility only, it can be a useful investigative tool whereas a monitored system allows a real-time reaction to criminal activity. Video surveillance systems are also often very useful in mitigating against risk where other forms of security are not feasible.

It is important that an operational requirement for VSS is drawn up for non-residential premises in accordance with their specific use and that the objectives for the VSS are clearly established before a tendering process is started.

The VSS must record at a minimum of 25 frames per second so events can be watched, monitored and reviewed easily. Staff shall be sufficiently trained to operate the system and be able to make recordings available to Police on request and an operational requirement must take account of this fact. The system should have capacity to store images for at least 30 days, be installed to BS EN 62676 (Video surveillance systems for use in security applications) and compatible with planned lighting and landscaping schemes.

Video surveillance systems shall be registered with the Information Commissioner's Office (ICO) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available at this website:

<https://www.ico.org.uk>

The data controller must ensure that all VSS images that can be used to identify individuals are used, stored and disclosed in line with the GDPR principles.

CCTV/ VSS should be installed by NSI/ SSAIB approved contractor.

Intruder and hold-up alarm systems

Intruder and hold-up alarm systems shall meet the requirements of BS EN 50131 (Intrusion and hold-up systems) and EN 50136 (Alarm transmission systems and equipment). All installations shall be in accordance with the current electrical regulations.

Intruder alarm should be installed by NSI/ SSAIB approved contractor.

Security fogging devices can be incorporated within the intruder alarm system to disorientate the intruder when the alarm system is activated. They must conform to BS EN 50131-8:2019 (Alarm systems. Intrusion and hold-up systems - Security fog devices).

External lighting

In terms of security, the objective of lighting non-residential units after dark is to deter or detect an intruder.

Lighting design shall be co-ordinated with a video surveillance system and landscaping, designed to avoid any conflicts and to ensure that the lighting is sufficient to support a VSS. Light fittings shall be placed in vandal-resistant housings.

A lighting scheme shall provide uniformed lighting levels with good colour rendition and be sufficient to cater for lawful after dark activity around the industrial or warehouse unit and site. It shall not cause glare or light pollution and shall support both formal and informal surveillance of the site.

External illumination when the building is unoccupied is recommended for entrance gates and routes to the main entrance and doors, car parks (if occupied by vehicles) and observable building elevations. Bollard lighting is not recommended due to low light spill and vulnerability to criminal damage.

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District