Consultee Comments for Planning Application 2025/93438

Application Summary
Application number: 2025/93438
Location: Arena Young Peoples Centre, Moorlands Road, Dewsbury, WF13 2LF
Proposal: Erection of 10-unit (class C2) special needs care home, day centre (class E(f), administration and training building (class E(g)(i)
Planning Officer: Ellie Thornhill

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).

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 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 27/01/2025 and 27/01/2026. The search criteria included residential burglary, robbery, arson, criminal damage, vehicle crime (theft of, theft from, interference) and theft of pedal cycle in the area of partial postcode WF13 2*. This returned 109 results: 24x residential burglary (21x home, 3x unconnected building), 7x robbery, 5x arson, 37x criminal damage (17x dwelling, 15x motor vehicle, 5x non-specific), 4x vehicle interference, 15x theft from vehicle, 14x theft of vehicle, 3x theft of pedal cycle.

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 WF13 2* area between 27/01/2025 and 27/01/2026. This produced 36 results, 5 of which were recorded in the vicinity of the proposed development. These related to nuisance youths and vehicular antisocial behaviour, with some other matters not deemed of relevance to this application.

West Yorkshire Police have no objection 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:

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). 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

It is important that the boundary between public and private areas is clearly indicated. Plant specimens may be used to discourage access to specific areas of the house frontage, for example blocking the view into a ground floor window. Encourage judicious planning, making sure that the plant used is suitable for the environment that it is being used in. It is important to consider both the growth rate and the ongoing maintenance when using planting for security purposes.

Gates to the side of dwellings that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked. Such gates must be located on or as near to the front of the building line as possible.

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.

Fencing panels or railings mounted on a wall shall be located as close to the outer (external) face of the wall as possible to eliminate climbing opportunities or use as informal seating. Fence heights shall be of a minimum 1.8m overall and be capable of

raking/ stepping to compensate for changes to the surface levels and to maintain the overall height over different terrain.

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.

Planting
Planting shall 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 shall be selected to have a mature growth height no higher than 1m, and trees shall have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision.

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.

Vehicle parking
Parking bays should ideally 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.
EV charging points should be overlooked and designated for use by persons linked to the site only- staff, residents and their visitors.

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

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 areas and footpaths leading to the buildings. Bollard lighting should be avoided. 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.
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.
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 internal communal areas
24-hour lighting (switched using a daylight sensor formally called photoelectric cells) to communal parts of the building 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.

Additional information for buildings containing multiple dwellings or bedrooms
It should be noted that regardless of the size of any development, where dwellings are inclusively designed to provide accessible housing, consideration must be given to disabled and older residents. Such residents may require additional access features such as full automation via remote key fob to enable independent entry through all doors to the building, car parks, communal areas, etc. Consideration must be given to a disabled person's ability to operate heavy doors and/ or reach controls or wall mounted fobs.

Cycle storage

External bicycle parking facilities should be designed for secure storage. As a minimum, bicycle hangers, lockers or other storage devices should be certified to Sold Secure SS104 Silver, 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, STS 501 Security Rating TR2 or STS 503 Security Rating TR2.
This are is required to be well-lit and covered by CCTV.

Please note:

It is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of any bicycle storage facilities and/or other areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion powered vehicles have been considered and specified.

Access control systems

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. Sufficient memory storage must be available to store images for as long as is necessary, but not less than 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.
The system should be compliant with UL 293 and installed by National Security Inspectorate (NSI) or Security Systems and Alarms Inspection Board (SSAIB) approved contractor.

Glazed curtain walling and window walls

SBD recognises four distinct types of glazed wall systems. These are:
i Large glazed units connected by a 'spider clamp' system
ii Glazed units directly retained within a framing system (usually aluminium)

iii Framed windows installed within a separate framing system
iv Framed windows connected to other framed windows to create a 'window wall'.

Glazed curtain walling (i and ii above) must be installed using a secure glazing retention system. This may be achieved by utilising the specific glazing retention test within PAS 24 or by an indicative test on the retention system certified to one of the following minimum standards, or above:
LPS 2081 Issue 1 Security Rating A
LPS 1175 Issue 8 Security Rating A1
STS 202 Issue 12 Burglar Resistance BR1
LPS 1673 Issue 1 Attack Rating AR.A60

Easily accessible glazing shall incorporate one pane of laminated glass certified to BS EN 356:2000 Class P1A, or above. Easily accessible is defined 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.

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+A1:2024, or
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.

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

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 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.

CCTV/ Video Surveillance Systems (VSS)

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 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.

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