Consultee Comments for Planning Application 2025/93464

Application Summary
Application Number: 2025/93464
Address: Spinksmire Mill, Huddersfield Road, Meltham, Holmfirth, HD9 4AN
Proposal: Demolition of existing building and erection of industrial building
Case Officer: William Simcock

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 crime and incident information listed 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 in the locality:

I have conducted a search using WYP crime data and mapping tool. The search covered offences committed between 08/04/2025 and 08/04/2026. The search criteria included burglary business and community, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) in Meltham.

This returned 73 offences: 4x arson, 10x burglary business, 38x criminal damage (4x non-dwelling, 13x dwelling, 8x motor vehicle, 13x non-specific), 3x robbery, 3x vehicle interference, 5x theft from vehicle, 10x 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 Meltham area between 08/04/2025 and 08/04/2026. This returned 78 incidents, 5 of which were recorded in the vicinity of the site. These related to nuisance motorbikes and quads, and youths setting fire in the woods.

West Yorkshire Police have no objection in principle to this application. Should the proposal be approved, we respectfully request the inclusion of a PLANNING CONDITION for SECURITY MEASURES, in the interests of crime prevention and community safety.

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.

Roof access and aids to climbing

Unauthorised access to roofs can make a range of crimes from burglary to arson easier to commit. Attention is drawn to relevant legislation (including the Occupiers' Liability Act) concerning the responsibilities and liabilities of building owners/ occupiers for the safe use of roof areas and relevant signage. Creation of climbing aids must be avoided.

Lightweight wall construction

Where lightweight wall construction is being considered, the use of insulated sheet cladding and a reinforced lining such as welded steel mesh can enhance the security of the building fabric.

Lightweight wall systems shall be installed by approved contractors, in compliance with the manufacturer's instructions and shall be certified to one of the following minimum standards or above:

LPS 1175 Issue 8 Security Rating A1
LPS 1673 Issue 1 Attack Rating AR.A60
LPS 2081 Issue 1 Security Rating A
STS 222 Issue 4 Burglar Resistance BR1(S)
STS 202 Issue 12 Burglar Resistance BR1

Doorsets and windows

BS 6375-2:2009 defines the resilience and operational characteristics of both doorsets and windows which, in simple terms, means to test a doorset or a window to ensure that it will withstand the demands of repeatedly being opened and closed over a significant period of time. Class 4 (moderate use) is usually deemed sufficient.

External doorsets shall be certified to one of the following minimum standards or above:
STS 222 Issue 4 Burglar Resistance BR2(S)
LPS 1175 Issue 8 Security Rating B3
STS 202 Issue 12 Burglar Resistance BR2
LPS 1673 Issue 1 Attack Rating AR.A180+
The responsibility for the specification and location of security, fire and/ or smoke rated doorsets lies with the developer or the developer's agent (or whoever is designated as a responsible person as defined by The Regulatory Reform (Fire Safety) Order 2005). Fire doors shall be alarmed to prevent them being left open for ventilation or regularly used as part of a short cut route for staff.

All easily accessible windows shall be certified to one of the following minimum standards or above:
STS 222 Issue 4 Burglar Resistance BR2(S)
LPS 1175 Issue 8 Security Rating B3
STS 202 Issue 12 Burglar Resistance BR2
LPS 1673 Issue 1 Attack Rating AR.A180

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.

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.

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.

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 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 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.

Information about Secured by Design

The SBD Non-Residential Award ranges from new schemes to refurbishments of existing buildings. The scheme encompasses both non-residential developments where the public have no formal access, such as industrial units, factories, warehouses and office buildings, and those where public access is integral to the non-residential use, such as retail premises, leisure centres and public service buildings. Such developments may range in size from a single unit with a defined use to a group of buildings with multiple uses.

Secured by Design provides design guidance and specification requirements for non-residential premises so as to reduce the risks of crimes against the person or property such as burglary, theft, arson, vehicle crime and assault; there is often an accompanying reduction in the fear of crime and antisocial behaviour.
Secured by Design is owned by the UK Police Service and supported by the Home Office.
For detailed requirements of SBD Non-Residential Gold, Silver and Bronze award, please refer to the Secured by Design Non-Residential (Commercial) Guide 2025 which can be found at www.securedbydesign.com, under 'Specialist Design Guides' section.
If you would like to apply for the Secured by Design award, please use the 'SBD Non-Residential' application form which can also be found at the above website.

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District