Consultee Comments for Application 2025/93470

Application Summary
Application number: 2025/93470
Location: Castle Hall, Lee Road, Ravensthorpe, Dewsbury, WF13 3BE
Proposal: Change of use of existing care home (Use Class C2) to 11 self-contained residential flats (Use Class C3), including internal alterations
Planning Officer: Danielle Cooper

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 in the locality:

I have conducted a search using the WYP crime data and mapping tool. The search covered offences committed between 17/02/2025 and 17/02/2026. The search criteria included burglary residential, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for Ravensthorpe area.

This returned 107 results: 5x arson, 24x burglary residential (21x home, 3x unconnected building), 11x robbery, 37x criminal damage (2x non-dwelling, 13x dwelling, 12x motor vehicle, 10x non-specific), 2x vehicle interference, 9x theft from vehicle, 19x 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 Ravensthorpe area between 17/02/2025 and 17/02/2026. This produced 78 results, 30 of which were recorded in the vicinity of the proposed development. These related to nuisance off-road motorcycles, fireworks, youths (setting fires/ using e-scooters/ climbing on building roofs). Holroyd Park was a repeated location, particularly for off-road bikes.

West Yorkshire Police have no objection in principle to this application. We would respectfully request the inclusion of a PLANNING CONDITION for SECURITY MEASURES in the interests of crime prevention and community safety. These are to include boundary treatments and lighting as well as measures outlined by the applicant in the 'Crime Statement' section (pp. 7-8) of Design & Access and Planning Statement document dated 14/01/26.

Recommended security measures, supported by SBD Residential Guide 2025:

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 doorsets and all doorsets allowing direct access into the homes should 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+

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) should 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

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 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

As an alternative, although not originally intended to enhance security, the following 'Robust Details' have shown to offer some resistance to intrusion:
E-WT-2 (timber wall construction)
E-WS-3 (light steel construction)
E-WM-20 (masonry wall construction)
Subject to a fire risk assessment, security can be enhanced by the installation of expanded metal in the areas concerned.

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. The system must provide unrestricted egress from the building in the event of an emergency or power failure. Tradesperson or timed-release mechanisms are not permitted as they have been proven to be the cause of antisocial behaviour and unlawful access to communal developments.

Visitor door entry system

A door entry system is a visitor system that is able to call a dwelling, whether individual or served from a communal entrance. It shall allow a visitor to contact the requested dwelling within the particular system and/ or building, and hold a two-way simultaneous conversation between the visitor and occupant of the dwelling. It will allow the occupant to see and identify the visitor and their location, and will enable the occupant of the dwelling to remotely operate the electric locking device from their room terminal, thereby unlocking the communal entrance door(s) associated with the action and allowing the visitor access.

Secure mail delivery

There are increasing crime problems associated with the delivery of post to buildings containing multiple dwellings or bedrooms. Therefore, mail delivery that compromises the security of residential areas of a multi-occupied building in order to deliver individually to each residence is not permitted.

Communal mail and parcel delivery facilities serving multiple flats must incorporate the following security measures:

- External delivery facilities shall be positioned adjacent to the entrance area
- Internal delivery facilities shall be positioned within an entrance area with access control
- Access control to this area shall have a data logging facility
- Both internal and external delivery areas shall be comprehensively covered by video surveillance
- Mail and parcel delivery boxes shall be equipped with high security cylinders that are not subject to master key access

- Mail and parcel delivery boxes shall be of robust construction, shall incorporate an anti-fishing design and be fire resistant
- Individual letter boxes shall have a maximum aperture size of 260mm x 40mm
- All delivery boxes must be installed in accordance with the manufacturer's specification
- A secure system of depositing parcels, such as the smart parcel boxes used by the major internet shopping companies, shall be considered where appropriate.

Letter boxes certified to the Door and Hardware Federation's Technical Specification 009 (TS 009) offer reassurance that all of the above attributes have been met.

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 and garage areas and footpaths leading to dwellings and blocks of flats. Bollard lighting is for wayfinding only, not security. Luminaires with high colour rendering qualities (60 or above on CRI) are recommended; overall lighting uniformity levels of 0.4 or 40% should be achieved if feasible. External public lighting must be switched on using a photo electric cell (dusk to dawn) with a manual override or via a Central Management System (CMS) for large scale developments. 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.

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.

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District