

Consultee Comments for Planning Application 2026/90232

Application Summary

Application Number: 2026/90232

Address: New Mills, Brougham Road, Marsden, Huddersfield, HD7 6AZ

Proposal: Redevelopment of mill complex of 11,584sqm for mixed use development, including building demolition, site clearance, site remediation

works, the removal of buildings and floor slabs to open up the River Colne, repairs to retained buildings, conversion of lower ground floor of western mill to Class E (food and non-food retail, restaurant and cafe), new buildings providing light industrial / R&D uses (limited to Use Classes Eg(ii)(iii)), the alteration and repair of an office building (Use Class Eg(i)), the creation of a new public square and associated hard and soft landscaping, circulation and servicing space, car parking and ancillary structures

Case Officer: Victor Grayson

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.

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 11/05/2025 and 11/05/2026. The search criteria included burglary business, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for the area of Marsden.

This returned 48 offences: 1x arson, 4x burglary business, 0x robbery, 15x criminal damage (1x non-dwelling, 2x dwelling, 2x motor vehicle, 10x non-specific), 5x vehicle interference, 0x theft from vehicle, 23x 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 reports which occurred in Marsden area between 11/05/2025 and 11/05/2026. This returned 35 incidents, 17 of which were within proximity to the site. These related to few incidents of vehicular antisocial behaviour (doing 'donuts', playing loud music) and multiple reports of nuisance youths.

West Yorkshire Police have no objection in principle to this application. Should it 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 SBD Non-residential
(Commercial) 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.

External waste storage

Waste and rubbish containers, particularly wheelie bins, can be re-positioned and used to aid climbing to vulnerable parts of buildings whilst their contents can be used as fuel for arson attacks. To combat these two risks the bins shall be retained in a lockable roofed store set apart from the main buildings and the containers themselves fitted with lockable lids. Advice in respect of a safe stand-off distance, fire and smoke detection devices and fire sprinkler systems shall be sought from the appropriate fire authority. Adequate secure provision (as above) for temporary storage of all recyclable materials awaiting collection or other processing shall be provided.

External furniture and litterbins

External furniture shall be of a robust vandal and graffiti resistant design.

Furniture shall be fixed into the ground in order to prevent its theft and reduce the possibility of it being used as either a climbing aid or as a tool to break through the shell of a building. External furniture shall not be located at or close to a building line or a boundary if there is a possibility of it being used as a climbing aid.

Litterbins can sometimes be used to assist climbing and/ or the contents used to start fires. It is preferable that these bins are of a type that can be locked onto a fixed base some distance from the buildings. Under no circumstances must litterbins be wall mounted beneath windows or on walls that are themselves covered in combustible material.

Landscaping

Planting designs must mitigate against crime rather than contribute towards opportunities to commit it. Landscaping must be maintained to ensure it does not blind the VSS or obscure lighting. Future maintenance requirements shall be considered at the design stage.

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 system.

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.

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 protected where vulnerable to vandalism.

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.

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

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

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 anti-social 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