

# Consultee Comments for Planning Application 2026/90472

## Application Summary

Application Number: 2026/90472

Address: The Royal Air Forces Association, Broughton House, Cambridge Street, Batley, WF17 5JH

Proposal: Change of use from private members club (sui generis) to mosque with school (Class F1) (within a Conservation Area)

Case Officer: Elenya Jackson

## Consultee Details

Name: Agnes Boryn- Kirklees DOCO, West Yorkshire Police

Address: Huddersfield Police Station, Castlegate, Huddersfield, HD1 2NJ

On behalf of: West Yorkshire Police

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](http://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 29/04/2025 and 29/04/2026. 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 WF17 5\*.

This returned 127 offences: 5x arson, 28x burglary business, 46x criminal damage (11x non-dwelling, 11x dwelling, 12x motor vehicle, 12x non-specific), 6x robbery, 4x vehicle interference, 15x theft from vehicle, 23x theft of vehicle.

Due to the proposal relating to a place of worship, an additional search for racially or religiously aggravated offences and non-crimes was also conducted for the same timespan and area. This produced 15 results: 1x common assault, 1x S47 assault, 10x harassment, 2x public order matter, 1x threats to kill.

#### 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 WF17 5\* area between 29/04/2025 and 29/04/2026. This returned 159 incidents, 23 of which were recorded in the vicinity of the premises. The matters of note related to nuisance youths and vehicular antisocial behaviour (motorcycles/ quads/ dangerous driving).



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<sup>[1]</sup> The design, function and operation of the Video Surveillance Systems should be planned and implemented following an Operational Requirements Process. For technical information see the Surveillance Camera Commissioners website or [CCTV | NPSA](#)

**West Yorkshire Police have no objection in principle to this application. 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.

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.

If an immediate police response is required, installers must meet the requirements of the National Police Chiefs' Council (NPCC) policy document – Guidelines on Police Requirements & Response to Security Systems are available at:

<http://www.policesecuritysystems.com/national-police-chiefs-council-security-systems-policy>

<http://www.policesecuritysystems.com/secured-by-design-alarm-standard>.

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).

### Automated access control systems

Automated access control systems shall have a data logging facility and comply with BS EN 60839 - Alarm and Electronic Security Systems and UL293.

An intrusion detection system (IDS) will detect and signal the presence of an intruder, or an intrusion attempt, into a secured area. A secured area can be a selected room, an entire building, or group of buildings. Further information is available from the NPSA at:

<https://www.npsa.gov.uk/intrusion-detection>.

### 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