

Consultee Comments for Planning Application 2026/90911

Application Summary

Application Number: 2026/90911

Address: Bulay Villa, Bulay Road, Thornton Lodge, Huddersfield, HD1 3NH

Proposal: Erection of a building and change of use from car park (Sui Generis) for car valeting and detailing purposes (Class B2)

Case 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 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 01/06/2025 and 01/06/2026. The search criteria included burglary business, robbery, arson, criminal damage and vehicle crime (interference, theft of, theft from) for the area of partial postcode HD1 3*.

This returned 137 offences: 2x arson, 10x burglary business, 77x criminal damage (5x non-dwelling, 16x dwelling, 41x motor vehicle, 15x non-specific), 11x robbery, 6x vehicle interference, 17x theft from vehicle, 14x 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 HD1 3* area between 01/06/2025 and 01/06/2026. This returned 59 incidents, 8 of which were in the vicinity of the premises. Matters of note related to obstructive parking, youths setting off fireworks and a group of inebriated males being noisy.

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.

This is particularly important given numerous references in the DAS to previous and existing ASB-related issues on this site.

Recommended security measures, supported by 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.

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.

Soft landscaping to the front of non-residential units is good design practice provided that it is set away from footpaths and is not allowed to become overgrown to the extent where doors, windows and other access points become obscured. An area of hard paving in front of a unit can reduce the likelihood of overgrown plants providing cover for criminal behaviour.

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.

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. Please consider vandal-resistant housings for easily accessible cameras to prevent damage and loss of evidence.

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 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

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, LPS 1175, STS 202 or LPS 1673 and be able to survive many cycles of repeated use.

External doorsets shall be certified to one of the following minimum standards or above:

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

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).

All easily accessible windows shall be certified to one of the following minimum standards or above:

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 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.

Security glazing

All ground floor and easily accessible glazing must incorporate one pane of laminated glass or glass tested to BS EN 356:2000 (Glass in building. Security glazing. Testing and classification of resistance against manual attack) to category P1A or above.

Roller shutters and grilles

Roller shutters and grilles shall be certified to 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

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District