Consultee Comments for Application 2026/91912

Application Summary
Application number: 2026/91912
Location: rear of 271 Cliffe Lane, Gomersal, Cleckheaton, BD19 4SB
Proposal: Removal/variation of conditions 2 and 3 (plans) on previous permission 2023/92966 for demolition of existing dwelling and erection of 97 dwellings including formation of new access from Cliffe Lane, landscaping, public open space and all associated infrastructure and engineering work
Planning Officer: Louise Bearcroft

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 14. Achieving well-designed places, Section 15. Promoting sustainable transport, Section 17. Pollution, public protection and security)
https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf
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.

West Yorkshire Police have no objection in principle to this application. However, there are some concerns regarding its existing form.
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 Residential Guide 2025:

Please note: national standards and specifications are often updated, please ensure that the latest version of the security standards and specifications included in this document are adhered to.

Construction phase security

Unfortunately, there are many crimes which occur during the construction phase of a development; the most significant include theft of plant equipment, materials, tools and diesel fuel. Security should be considered throughout the life cycle of the development and in place prior and during the construction phase. 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.

Boundaries

Open spaces must have features which prevent unauthorised vehicular access. Boundary security measures and features should strongly and clearly define the public, communal, semi-private and private spaces.

For the majority of housing developments, it will be desirable for dwelling frontages to be open to view so walls, fences and hedges will need to be kept low. Front garden planting of feature shrubs and suitable trees (e.g. open branched or light foliage) will be acceptable provided they are set back from paths and placed to avoid obstructing visibility of doors, windows and access gates to the rear of the property. Similarly, planting which allows a clear line of sight to the pavement and road is preferable. Vulnerable areas, such as exposed side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. There may be circumstances where more open fencing is required to allow for greater surveillance. Trellis topped fencing can be useful in such circumstances, to increase the height of the boundary and make it more difficult to climb over. The outward face of the fence must be smooth, without cross members or footholds to deter climbing and use as informal seating.

Sub-divisional boundaries are also required to be 1.8m high to achieve security, demarcation and privacy. Again, trellis topping can be utilised here (1.5m solid fence + 30cm of trellis topping).

Gates to the side of dwellings that provide access to rear gardens or yards must be robustly constructed, be the same height as the fence (minimum height 1.8m) and capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb over, crawl under or removed from their hinges.

Climbing aids

Boundary walls, bins, fuel stores, meter boxes, street furniture, trees, low flat roofs, car ports or balconies should be designed and located so that they do not provide climbing aids into the property.

Street lighting

All street lighting for adopted highways and footpaths, private estate roads, unadopted roads and car parks must comply with BS 5489-1:2020.

Bollard lighting should be avoided- it does not project sufficient light at the right height, making it difficult to recognise facial features. It can also be easily obscured or damaged.

Trees may restrict the performance of street lighting by blocking light or causing damage through collision with branches and should not be located within 5 metres of a lighting source. Account must be taken of the effects of seasonal variations on planting during the design stage.

Overall Lighting uniformity (Uo) – levels of 0.4 or 40% – are recommended where possible to ensure that lighting installations do not create dark patches next to lighter patches where the human eye has difficulty in adjusting quickly enough to see that it is safe to proceed along any route. If high levels of uniformity are neither achievable nor appropriate for technical or locally applying environmental reasons, the highest levels of uniformity possible shall be achieved.

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.

The Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons.

Planting

Planting shall not impede the opportunity for natural surveillance and wayfinding, and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs shall be selected to have a mature growth height no higher than 1m, and trees shall have no foliage, epicormic growth or lower branches below 2m, thereby allowing a 1 metre clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance. As a general rule, building frontages should be open to view. Attention

should be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property, obscure lights or CCTV cameras.

Vehicle parking

Vehicles should either be parked in locked garages or on a hard standing within the dwelling boundary.

Where parking is designed to be adjacent to or between units, a gable end window will provide residents with an unrestricted view over their vehicles; opaque or otherwise obscured glass in gable end windows does not constitute an unrestricted view in these circumstances.

Where parking bays are monitored by video surveillance, an identifiable facial image is a basic necessity. Video surveillance systems (VSS) and signage shall be General Data Protection Compliant (GDPR) compliant.

Lightweight framed walls in houses and buildings containing multiple dwellings

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, should 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.

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.

The term ‘doorset’ refers to a door, frame, locks, fittings and glazing as one combined unit.
Door frames must be securely fixed to the building fabric in accordance with the manufacturer’s instructions and specifications.

All doorsets allowing direct access into the home (e.g. front and rear doors, interconnecting garage doorsets, French doors, bi-fold or sliding patio doorsets, dedicated private flat or apartment entrance doorsets, communal doorsets, easily accessible balcony 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+

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.

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).

It is recommended that door chain/ opening limiter meeting the requirements of the Door and Hardware Federation Technical Specification 003 (TS 003) is installed on the doorset to which a caller can be expected- normally the front door.
A door viewer meeting the requirements with the Door and Hardware Federation Technical Specification 002 (TS 002) standard should be fitted between 1200mm and 1500mm (in addition to 1050mm for wheelchair accessible dwellings) from the bottom of the door, this is not required if the doorset is installed with clear glazing or if there is a side panel with clear glazing (see Approved Document Q, Section 1: Doors, paragraph 1.4).

Approved Document Q, Section 1 (General), clause 1.1, states that where access to the dwelling can be gained via an interconnecting doorset from the garage, then either the garage doorset/s (vehicular and pedestrian) or the interconnecting doorset can be designated as the secure doorset.
Where a vehicular garage doorset provides the primary security in this area of the building it 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+

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) 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
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.

Secure mail delivery

There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and 'fishing' for personal items (which may include post, vehicle and house keys, credit cards). SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation's Technical Specification 009 (TS 009).

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 (including patio doors), car parking and garage areas, and footpaths leading to dwellings. Bollard lighting should be avoided. Lighting systems enabled by PIR motion sensors are NOT recommended by West Yorkshire Police due to the lack of operational consistency and their proneness to criminal damage. They can also be a causal factor in neighbour disputes due to the lights flashing on and off as well as allow an offender an opportunity to work undetected for the same reason.

External public lighting must be switched on using a photo electric cell (dusk to dawn) with a manual override. If LED light sources are used, then shorter burning hours can be programmed as no warm-up time is required for the lamp.

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 and landscape proposals
- be of good quality to produce viable images and videos should an incident occur.

West Yorkshire Police recommend that images are stored for a minimum of 31 days.

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 approved contractor.

Access control

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.
Automated access control systems shall have a data logging facility and comply with BS EN 60839 - Alarm and Electronic Security Systems as well as UL293. The security levels shall be checked after installation and be strictly managed so that codes and cards can be added and deleted as necessary.
Access control system should be installed by NSI/ SSAIB approved contractor.

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.

Information about Secured by Design

Secured by Design is a Police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice specified in SBD guides has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office.

The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It also has a significant impact on antisocial behaviour. Therefore, there are substantial carbon cost savings

associated with building new homes to the SBD standard. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.

Secured by Design has three differing levels of security award:

- SBD Gold which incorporates the security of the external environment together with the physical security specification of the home
- SBD Silver which offers those involved in new developments, major refurbishment and the individual the opportunity to gain an award for the level of physical security provided
- SBD Bronze which offers a route to achieve a reasonable level of physical security for bespoke or refurbished properties where a traditional enhanced security product is not available or cannot be utilised due to the listed building or other conservation status.

If you would like to apply for the Secured by Design award, please use the 'SBD Residential' application form found at www.securedbydesign.com.

Kind regards,

Agnieszka Boryn
Designing Out Crime Officer
Kirklees District