



STAFFORDSHIRE
POLICE

Local Plans
Development Control
South Staffordshire District Council
Codsall
South Staffs
WV8 1PX

Early Intervention & Prevention Unit
Ground Floor, Block 9
Staffordshire Police HQ
Weston Road
Stafford
ST18 0YY

Email: DOCO@staffordshire.police.uk

Date: 13/12/22

Dear Sir or Madam

Ref No: Local Plan 2018 to 2039 for South Staffordshire.

The proposal has been reviewed with particular reference to Police CPI's Secured by Design guidance and in accordance with the recognised principles of Crime Prevention Through Environmental Design.

The following comments should be considered in the light of the following:

- Under the heading Promoting Safe and Healthy Communities, Para 91(b) of the NPPF states "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion."
- Under the heading Achieving Well-Designed Places, Para 127(f) of the NPPF states "Planning policies and decisions should ensure that developments create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."
- Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
- **South Staffordshire District Council LDF Core Policy:**
 - Core Policy 13, Community Safety states;
The design of buildings and spaces can make a significant contribution towards reducing the scope for crime, and create more pleasant and reassuring environments in which to live, work and play. The opportunities for crime to occur can be minimised by designing and planning out crime in new development. The Council supports the national guidance 'Secured by Design' and will continue to work with Staffordshire Police architectural liaison officer in relation to the design and layout of development proposals.
- **Policy CS1: Designing Out Crime:**
 - In accordance with Core Policy 13, the design of development must include, means of reducing the opportunities for crime and anti-social behaviour, and must also seek to reduce the potential for fear of crime. This will include support for:
 - Social facilities to be provided in locations which can be adequately controlled and supervised;
 - Development to be designed to increase natural surveillance of public and private spaces, with continuous public surveillance as an alternative;
 - Liaison with the Police to design out crime and fear of crime in specific schemes which also meet other design objectives in Policy EQ11.

Development proposals should be consistent with other local planning policies.

Core Policy 13 sets out the strategic policy for community safety that supports the aims and objectives of the Sustainable Community Strategy and the Community Safety Partnership Plan. The above Policy provides further detail on the design of development and 'Secured by Design', and in turn supports Policy EQ11 covering wider design considerations.

- The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998.

I recommend the Designing Out Crime Officer at Staffordshire Police is consulted at all stages of the consultation, so we can ensure the principles of Crime Prevention Through Environmental Design (CPTED) are incorporated into the designs and development.

General comments regarding the Local Plan.

Affordable Housing

- **Building for a Healthy Life states:** A mix of housing types and tenures that suit the needs of the local community. This may include first time buyer homes, family homes, homes for those downsizing and supported living.
- Affordable homes should be evenly dispersed throughout the development, and not grouped together in large numbers.
- When a number of terraced houses are grouped together, the adjacent driveways limit the availability of on street parking. Blocked driveways may lead to neighbour tensions, and reports of anti-social behaviour to the council, housing associations, MPs and the police.
- It is recommended apartment blocks have CCTV installed in the communal entrance, to prevent anti-social behaviour, and provide a sense of security for residents.

Specialist Housing

- Care homes have been mentioned to cater for the aging residents of Staffordshire.
- A number of elderly residents wish to maintain their independence, but can't manage stairs, so an increase in the provision of bungalows should be considered.
- A number of managed residential homes, are now building a number of bungalows onsite, to allow residents to have a sense of independence as well as the community atmosphere.
- Residential care homes, should be able to cater for independent residents as well as those who need support and nursing care. The provision of onsite facilities helps provide residents the community atmosphere. As well as nurses and care workers on site if required.
- Parking facilities should be available for residents, visitors, employees and dedicated parking for emergency services.

Green Infrastructure and Health

- Green infrastructure is mentioned, please note this should include play areas and activities which will encourage children of all ages to go outdoors, in a safe environment.
- Play areas should be located where they will have natural surveillance, from the community and residents (if appropriate), the play area should not be positioned away from the natural footfall of the dog walkers and joggers. Play areas are vulnerable to crime and being damaged, the result of this abuse is that the investment in a play area, its use, and contribution to the quality of life in the community can be seriously eroded.
- An evaluation of the needs of the community should be addressed prior to implementation of this area and it is important when carrying out a post implementation evaluation of crime or anti-social behaviour (ASB) of this facility to separate incidents around the play area i.e. roads, parking areas, drinking in the street, dwelling frontages, etc. from those which actually occur within it, part of any ASB evaluation should include how many perceived ASB incidents are attributed to estate families and incidents attributed to non-resident families.
- I use the word "perceived" because when a play area is being used to play or otherwise engage a young person this usually generates a certain amount of noise, this by itself is not anti-social – its noise.

- Public Rights of Way (PRoW) and cycle routes must be maintained to encourage the community to walk and enjoy the local environment. The PRoW should have good natural surveillance, with properties frontages overlooking the PRoW, and should not run behind residential or businesses properties.
- Canal and railway walks are abundant in South Staffordshire. The landscape should be regularly maintained to provide a safe walking environment.
- The paths should allow the users to have a clear line of sight in front of them, therefore reducing the fear of crime. Landscaping along the paths, should be dense low lying shrubs or planting, which do not obstruct the clear line of sight, and do not provide areas for individuals to hide. The footpaths should be wide enough for people and cyclists to pass comfortably.
- Frequent benches can help those with mobility difficulties to walk more easily between places.
- Suitable car parking provisions should be considered for those who travel to the area to enjoy the facilities.
- Consideration should be given to increase the availability of allotments to encourage growing their own produce, as well as improving their health and wellbeing.

Education facilities

- A number of schools are proposed with this local plan.
- School provisions. The safety of the pupils will be incorporated into the design of the schools. I acknowledge, the aim is to encourage walking children to school, but in reality, parents are dropping off their children on the way to work, so will be driving. Parent parking at drop off and picks should be considered, as anti-social parking may lead to community tensions, and complaints to the school, the council, the local MP, and the police.

Community Centre

- It is recommended security is considered when designing the community centre. Community centres can be extremely beneficial to a local community, and is often hired out for functions.
- It is important to compartmentalise the building to allow access to the community rooms, whilst keeping certain rooms and floors secure.
- It is important to avoid easily accessible flat roofs, as this can attract anti-social behaviour (ASB).
- The car park should be well lit, to ensure safe passage to and from private vehicles, as well as those walking. An entrance barrier should be considered for the car park entrance to prevent any unauthorised access to the car, which may lead to ASB.
- CCTV is recommended for both the car park and the community centre.

Community playing fields and associated club house

- If sports pitches will be provided for organised games, i.e. football, rugby or cricket, the provision of a club house, changing rooms with associated car park would be beneficial.
- Organised club games encourage the community bonding, as well as benefits to the health and wellbeing of the residents.

Climate change

- I appreciate the need to incorporate climate control measures throughout all future developments.
- It is important that EV charging points are installed on all properties, and apartment blocks have an EV charging point within the parking court, as well as industrial estates and businesses futureproofing for the increase of electric and hybrid vehicles in the future.
- Please note, if businesses wish to install photovoltaic (PV) panels, they should install these on the roof, as there has been a national rise in theft of PV panels and the cabling.
- Photovoltaic panel farms have increased in recent times. Please note security is paramount for these farms i.e. monitored CCTV and secure perimeter fencing, knee high post and rail fencing is not suitable.

Gypsies and Traveller and Travelling Showpeople Accommodation

- **DCLG Good Practice Guide 'Designing Gypsy and Traveller Sites' (May 2008)** states that there is no one ideal size of site or number of pitches, although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. Smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family. The guidance goes on to say that sites should consist of up to 15 pitches unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community.

Roads and Highways

- The road layout should help provide an enclosed community atmosphere.
- The roads, paths, and cycle routes should not create a number of escape routes for possible offenders to evade the police.
- The West Midlands Interchange and potentially the proposed industrial estate at ROF Featherstone will have good links to the main arterial roads, as well as the motorway system, especially once the M6 M54 link road is built.
- A number of freight goods related thefts have been reported from Hilton Services, it may be worth considering allocating land to provide secure HGV parking facilities at or for Hilton services. A secure site, would encourage use of the facilities, and may deter HGV drivers parking vehicles in laybys overnight.

Transport facilities

- The BTP Designing Out Crime Office will have a lot of influence in the security of a train station and the associated car park, cycle storage facilities and CCTV coverage. They will also look at suicide prevention measures if a bridge will be incorporated into the design. However, Staffordshire Police would appreciate being consulted throughout the whole process from design to development.
- The walking and cycling routes to and from the railway station, should be wide paths, preferably with a clear line of sight to eliminate the fear of crime.
- It is essential public transport has a regular and reliable service, to encourage residents to utilise it rather than their own personal vehicles.
- Safe and secure car parks are important if you wish to encourage the use of public transport.

Employment Sites

- It is important South Staffordshire District Council continues to consult Staffordshire Police regarding potential employment sites, as we will have in input into crime prevention from the design stage, not only for the building itself but also for the car parks.
- It also helps the local police to build a picture of the local business, and help provide a better relationship with the management team.
- A number of large scale employments sites have recently been developed in South Staffordshire i.e. I54; with more to be arriving with the approval of the West Midlands Interchange and potential employment site at ROF Featherstone. The M6 M54 Link road will potentially encourage more businesses to open in South Staffordshire.

Retail stores

- A variety of small convenience stores and large supermarkets are proposed for the developments. Security of the store, and the safety of the customers are always paramount to the design. The car parks should provide sufficient parking bays, suitable for the larger vehicles.
- It would be beneficial for CCTV in operate in the car parks, as well as the stores themselves.

Crime Prevention

Crime Prevention is mentioned with the local plan. It is imperative crime prevention is considered with all aspects of the design and development stage, for both residential and commercial properties, and for Urban Design Framework.

Nationally there is an importance in providing a safe environment to protect against Violence against Women and Girls, this has not been incorporated into your local plan.

Secured By Design

I request your local plan advises developers work to the principles of Secured By Design (SBD) and Crime Prevention Through Environmental Design (CPTED) to help reduce crime, and provide a safer environment.

It is recommended that the development should be built to Secured By Design Standards (SBD), which considers security within the design of any development. Guidance can be found in the Secured By Design Homes 2019 or Commercial 2015 V2 guide [SBD Design Guides \(securedbydesign.com\)](http://securedbydesign.com).

Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD developments as a result of criminal activity is more than 50% less than on non SBD developments, *the cost of installing SBD approved products equals 0.2% of the total build cost.*

One of the most revealing elements of research into SBD is how much 'safer' residents feel if they occupy a dwelling on an accredited development, even if they are not aware of the award status. There are few other initiatives which can deliver a measurable reduction in fear like this.

SBD supports one of the Government's key planning objectives - the creation of safe, secure, quality places where people wish to live and work. SBD applies quality standards to a range of security measures and should be seen as a positive marketing opportunity.

SBD can contribute towards BREEAM assessments.

The Safer Parking Scheme is a national standard for UK car parks that have low crime and measures in place to ensure the safety of people and vehicles. Accredited car parks are awarded with *Park Mark*, which provides the users the car park is a safe environment. I recommend the Park Mark principles are followed for all new car parks, even if accreditation is not sought.

South Staffordshire District Council's planning department do consult Staffordshire Police with any applications relating to matters mentioned in this local plan.

Kully Tanda
Designing Out Crime Officer
Staffordshire Police

The recommendations contained within this report are the professional statements of the author. As such, they represent what we believe to be the best advice in terms of 'doing all that is reasonable to prevent crime and disorder' under the terms of Section 17 of the Crime and Disorder Act 1998. All comments and recommendations are 'Site Specific'. Crime prevention advice is given free without the intention of creating a contract. Neither do the Home Office or the police service take any other legal responsibility for the advice given.