

## Lucy Davison

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**From:** King, Ian 5637 <Ian.King@warwickshire.police.uk>  
**Sent:** 15 September 2025 07:38  
**To:** Lucy Davison  
**Subject:** R25/0565  
**Attachments:** Boiler Control Unit Sign.pdf

### Planning Legislation

Thank you for inviting me to comment on this application. Please can I remind you of paragraphs 91, 95 and 127 of the National Planning Policy Framework require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 104, 106, 110, and 117 also require the creation of safe environments within the context of the appropriate section.

Paragraph 97 of the Framework, advises: Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

In providing these comments Warwickshire Police have paid regard to section 17 Crime & Disorder Act & PIN's 953 - The Crime and Disorder Act 1998 which introduced a wide range of measures for preventing crime and disorder. Section 17 (as amended by Schedule 9 of the Police and Justice Act 2006), imposes an obligation on every police authority, local authority (which includes Planning Authorities) and other specified bodies to consider crime and disorder reduction in the exercise of all their duties.

It states:

17(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,

- (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and
- (b) the misuse of drugs, alcohol and other substances in its area.

National Policy and Guidance Section 17 of the Crime and Disorder Act 1998 states, 'Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area'. The PCCWM therefore has a statutory duty to secure the maintenance of an efficient and effective police force for the area. The Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime.

Paragraph 20 of the National Planning Policy Framework (NPPF, updated December 2024) includes, inter alia, a requirement for policies to deliver sufficient provision for infrastructure, including those related to security, with Paragraphs 16, 26 and 29 indicating that this could be delivered through joint working with all partners concerned with new development proposals. Section 8 of the NPPF promotes healthy and safe communities and seeks safe and accessible development which calls upon recognised best practice and standards to design-out crime, or at the very least minimise crime and disorder, and the fear of crime, in the interests of quality of life and social cohesion. In this regard, it is particularly relevant and noteworthy that Paragraph 101 of the NPPF recognises the need for new, expanded and upgraded public service infrastructure when considering new development and planned growth, and specifically lists “blue light” services (i.e. emergency services) as relevant and appropriate recipients of infrastructure support. It also states that, “significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.” Paragraph 135 (f) of the NPPF calls for the creation of safe places where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. Annex 2 (NPPF) identifies the police as “Essential local workers”, defined as “Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers”. (Author’s emphasis)

In light of this legislation please see the following comments/ recommendations that I have to make,

### **Justification for Recommendations**

1. It is imperative that security is a major feature within this development. One way to ensure this, is to build the development in line with the Secured by Design guides. Such guides have academic research embedded into the principles to enhance crime reduction and crime prevention.
2. Crime statistics.

### **Secured by Design & ADQ**

3. I strongly recommend that any residential accommodation is built to the standards laid out in the Secured by Design `Homes 2025 guide`. It is important that ‘Secured by Design’ is achieved, not just some of the principles embedded into the design. For more information, please see the following link,  
[RESIDENTIAL GUIDE 2025 27325.pdf \(securedbydesign.com\)](#)
4. Secured by Design has a directory for a product based accreditation scheme **the Police Preferred Specification** which provides a recognised standard for all security products that can deter and reduce crime. I strongly recommend that this is consulted when looking for product security for the development.
5. Contingent to planning, I strongly recommend that the applicant ensures that the development conforms to the police crime reduction initiative ‘Secured by Design’ when developing this proposal.
6. Whilst Approved Document Q deals with security of a dwelling. It should be pointed out that the standards in ADQ are lower than those set out in Secured by Design. ADQ is now over a decade old, and the methods of attacking a residential premise has moved on. I strongly recommend that any residential accommodation is built to the standards laid out in the Secured by Design `Residential guide, 2025`.

If SBD is not achieved I advise that the site is built to the standards laid out in the Building Regulations Approved Document Q (ADQ). This refers to the introduction (2016), of a security element within the Building Regulation, in England, for all new residential dwellings. ADQ requires that any products used must have certification to show manufactured compliance to a design that has been tested to an acceptable security standard.

### **Building Positioning.**

7. I strongly recommend that the 2.5 storey homes are located on the outer periphery of the development. In order, not to block the natural surveillance across the sight and to help aid natural surveillance over Public open space.
8. Any plots that are near to Public Open Space, should benefit from boundary treatments that are a minimum height of 1.8m, with defensive planting between the boundary treatment and any Public Open Space. The gable ends should benefit from a window and therefore should not be blank.

### **Doors & Windows**

9. I strongly recommend PAS 24:2022 security rated window sets.
10. I strongly recommend all main doorsets (front and rear) are installed and fitted to security standard PAS 24:2022.
11. I strongly recommend installing and fitting TS007 3-Star security rated locks (anti-drill, anti-bump, anti-snap) to all external doorsets. Security rated locks, have the added feature of a restricted keyway system, which stops unauthorized duplication. This helps establish a strong key control process for residents. Further information can be found on the following links:

[RESIDENTIAL GUIDE 2025 27325.pdf](#)

[Secured By Design TS007 3-Star Rated Locks](#)

[Sold Secure Diamond rated Locks](#)

### **Boundary Treatments.**

12. Any rear boundary treatments should be of close boarded fencing, with a minimum height of 1.8m. Consideration should be given to the topography of the land. Any access gates should be to the same height of the boundary treatment, ensuring that there is no difference in height. Front boundary treatments should be a maximum height of 1.2m and of a construction/ design which does not invite loitering or can be used as a seating aid.

### **Landscaping.**

13. I strongly recommend that any landscaping should not provide concealment, or prevent natural surveillance. All shrubs and hedges should have a maximum growth height of 1m and all trees pruned up to a minimum height of 2.4m, thereby maintaining a clear field of vision around the site.
14. Any Landscaping should not impede the opportunity for natural surveillance and wayfinding, and must avoid the creation of potential hiding places. To enhance natural surveillance shrubs should be selected to have a maximum mature growth height of 1m, and trees should have no foliage, epicormic growth or lower branches below 2m. Thereby, allowing a 1 metre clear field of vision across the site. Attention should be given to the location of walls and hedges so that they do not obscure doors or windows. Tree positions should not aid climbing into property or obscure lights or CCTV cameras.

### **Paths.**

15. Any paths that are constructed in the area of public open space should be as wide and straight as possible, to allow for easy passing of people, who use wheelchairs, mobility scooters or a pushchair.
16. Wide paths allow for good natural surveillance of the area and helps to avoid pinch points that could be used by offenders to hide or aid them in committing a crime.
17. All paths should be well illuminated, conforming to BS5489. Please note Bollard lighting is not acceptable as it can cause pooling of light. But may be used in addition as accent lighting.

## **POS and Areas of Play**

18. Any children's play area should also benefit from natural surveillance, have age appropriate signage and benefit from a boundary treatment.
19. Any areas of play should benefit from signage that informs the user of appropriate age-related play.
20. The location of areas of play requires careful consideration as they have the potential to attract anti-social behaviour if poorly sited. They need to have natural surveillance from nearby dwellings, safe routes to and from for users, clearly defined public/ private boundaries and features to prevent unauthorised vehicle access. Areas of play should be secured at night.
21. Care is needed to ensure that individual dwellings are not affected by play areas and they should be positioned to the front not the rear of dwellings.
22. Adequate provision should be made for informal association spaces for young people, which are subject to natural surveillance, but sited so as not to cause noise pollution.
23. Youth shelters should be sited not too close to footpaths to avoid intimidation by users.

## **Parking Arrangements Typologies.**

24. Any Parking provision should be in- curtilage to provide maximum natural surveillance. Residential vehicular parking should be sited, within view of an "active" room. An 'active room' is where there is direct and regular visual connection between the room and the street. Such visual connections can be expected from the lounge, unlike private rooms, such as bedrooms and bathrooms.
25. Courtyard and Underground parking are not advisable, as such provision lacks natural surveillance, which makes, such parking areas vulnerable to Crime.
26. I strongly recommend referring to approved document S, of the Building Regulations (England), which details infrastructure for the charging of electric vehicles. For more information. Please see the following link.

Infrastructure for charging electric vehicles: Approved Document S - GOV.UK ([www.gov.uk](http://www.gov.uk))

## **Cycle Parking.**

27. Any cycle provision, should consist of an anchoring point that is secured to the ground. Cycle anchoring points can be sourced from the following site,

[www.securedbydesign.com](http://www.securedbydesign.com)

28. Any cycle storage, should be transparent, benefit from natural surveillance and CCTV coverage. Cycle storage should be robust and meet security standards. Such cycle storage can be sourced from the following site,

[www.securedbydesign.com](http://www.securedbydesign.com)

## **Lighting.**

29. The Home Office recognises, that good lighting reduces crime. Lighting also contributes to reducing the fear of crime. Good lighting deters criminals, as they are less likely to be able to act unnoticed, increasing the chances of being apprehended. I strongly recommend that appropriate lighting is installed to illuminate the exterior of the building, all entrance and egress and car parking areas. Please see the following guide: [Lighting Against Crime \(securedbydesign.com\)](http://www.securedbydesign.com)

30. Lighting for the site needs to be appropriate for the layout of the building. For example, illuminating main entrances, sides and the rear of homes. Exterior security lighting should be installed onto the fabric of the building and be of white LED dusk to dawn lighting. Good lighting of this type, will assist in deflecting offenders and assists with removing offender anonymity. And the fear of crime.
31. Bollard lighting is not acceptable as it does not offer uniform lighting. Bollard Lighting, should be utilised, purely for wayfinding. As Bollard lighting does not project sufficient light at the right height, making it difficult to recognise facial features. As a result, bollard lighting causes an increase in the fear of crime and should be avoided.
32. I recommend, that any scheme should seek the guidance of a lighting professional, who can assist in following the guidelines and standards set out in the following links,
- [Secured by Design \(SBD\) | Lighting Consultancy | It Does Lighting](#)  
[Secured by Design - Lighting](#)  
[Lighting Against Crime | Institution of Lighting Professionals \(theilp.org.uk\)](#)
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33. Installation of any new street lighting for adopted highways and footpaths within and around the new development, private estate roads and footpaths, and parking facilities must comply with BS (British Standard) 5489-1:2020 (or the latest standard). Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements should be discussed, with the local authority lighting designers and/or accredited lighting professionals.

### **Highway Safety**

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34. I strongly recommend that consideration is given to mitigating the use of off-road bikes and electric vehicles being able to build up speed in areas of POS, along straight roads and paths. For more information relating to vehicle mitigation, please see the following link,

[www.securedbydesign.com](http://www.securedbydesign.com)

### **Refuse Collection/ Bin Storage.**

35. I strongly recommend that securely stored refuse arrangements are made at the rear (garden) of dwellings or side of the property (gated and with enough space to manoeuvre around with bicycles and garden equipment). If not secured correctly, Offenders can use utilise refuse bins in a number of ways, such as being used to negotiate and scale walls and fences, assisting access properties, Wheelie bins have a generous capacity, and easy to move, so are a convenient way for offenders to transport stolen goods undetected.

### **Communal Entrance**

36. Communal entrances should conform to LPS2081 SRB, 11.5mm anti bandit EN356 P4A rated glazing.

### **Construction Site Security.**

37. A guide is available to provide advice and guidance on construction site security. Building sites can attract anti-social behaviour, fall victim to criminal damage, tool and plant/machinery theft. Building sites can be a valuable target for thieves. For more information please see the following link,

[CONSTRUCTION SITE SECURITY GUIDE A4 8pp.pdf \(securedbydesign.com\)](#)

38. I wish to draw attention to the RIBA Plan of Work Security Overlay [Security Overlay to the RIBA Plan of Work \(architecture.com\)](#).

Warwickshire Police has seen an increase of vacant new build properties being targeted for burglary whereby newly installed heating boilers are stolen. Working with manufacturers has resulted in a recommendation being made that the front panel /controller unit be removed at the time of the boiler being installed and that this is not put in place until the property is ready to be handed over to the new owners. It is hoped that this will deter offenders as they will not be able to sell the boilers on without the front panel/control unit. Whilst Warwickshire Police accept that this increases workload and costs to the developer these are minimal compared to the cost of repairing any damage caused by offenders to enter a property and replacing the boiler unit itself especially when a number of properties have been targeted. I have attached a sign produced for display in the window of a vacant property.

### **Crime Trends**

39. I strongly recommend that any screening of vehicles provided by hedges and or planting does not prevent natural surveillance of vehicles. As this can aid offenders in committing vehicle crime offences such as theft of motor vehicle, theft from a motor vehicle, criminal damage to a motor vehicle and Catalytic Converter thefts.

### **Planning Condition Considerations.**

In light of the aforementioned Planning legislation I request that the following planning conditions are applied to this application in order to reduce and prevent crime and the fear of crime.

- A> A site wide Secured by Design application to be submitted
- B> A site wide lighting scheme is subject of a planning condition.
- C> WMP to be notified and consulted of any plot/design changes.
- D> A Planning Condition that enables the plan to be reviewed and amended with each subsequent Reserved Matters application, following detailed design review and any associated structural survey works.

### **Ending Statement.**

40. I strongly recommend that the Client contacts myself to discuss how Security can be embedded into the development, at their earliest convenience.
41. Warwickshire Police DOCO's and CTSA's are keen to continue liaising with architect/design team/construction company reps to dynamically review proposals for this project.
42. I have no further comments to make at this moment in time. Should planning permission be granted, then I welcome the opportunity to meet with the Client at the earliest opportunity. Should you wish to discuss any of the recommendations/ comments that I have made, then Please feel free to contact myself further.

Warwickshire Police have no objections to this application

Regards Ian

Ian King

Designing Out Crime Officer

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“Changes to the English Planning and Building Control Regulations, following in-depth reviews by the Department for Communities and Local Government (DCLG), have underlined the importance of the Police advice delivered over the past 25 years, specifically in the form of the Secured by Design (SBD) initiative. Secured by Design welcomes the introduction of a security element within the Building Regulation. Approved Document Q goes some way to improving security in the residential built environment, but does not include many of the elements that have contributed to the improvements in security that Secured by Design has delivered in communities around the country.”

Visit the 'Secured By Design' web site for DOCO contact details, design guides, licence holders & application forms: [www.securedbydesign.com](http://www.securedbydesign.com) <<http://www.securedbydesign.com>>