



**NOTTINGHAMSHIRE POLICE  
DESIGNING OUT CRIME OFFICER  
PLANNING CONSULTATION RESPONSE**

<b>Application number</b>	V/2025/0078
<b>Proposal</b>	Change of use from office to a house of multiple occupancy and dormer to rear
<b>Address</b>	198, Beardall Street, Hucknall, Nottinghamshire, NG15 7JU
<b>Lower super output area (LSOA)</b>	E01027928
<b>Date</b>	04/03/2025
<b>Consultee</b>	<b>Nick Butler MSc.,</b> Nottinghamshire Police: Designing Out Crime, Park Mark <sup>®</sup> Accredited Assessor, Secured by Design <sup>®</sup> Accredited Assessor, Sherwood Lodge, Nottingham. NG5 8PP.

Dear Sir or Madam,

Thank you for providing the opportunity to comment on this application.

It is the responsibility of the Designing Out Crime Officer to provide specialist advice and guidance regarding the built environment at every stage of architectural design, from pre-planning to the full development control process (to minimise crime, fear of crime, disorder, and anti-social behaviour).

This does not preclude subsequent recommendations from specialist departments within Nottinghamshire Police as required.

All consultations, where relevant, reflect the importance of reducing the harm caused by violence against women and girls.

We have also considered this application in the context of the legislation at the conclusion of this document.

## Comments:

The proposed development is situated in the Lower Super Output Area (LSOA) of E01027928 which attracts higher than average crime and disorder levels. All crime is recorded in the 95<sup>th</sup> percentile for England, Wales & N. Ireland in the last 24 months. Burglary is above the national average in the 72<sup>nd</sup> percentile along with vehicle crime (87<sup>th</sup>) and criminal damage (97<sup>th</sup>) (fig 1).

**Your postcode centroid, NG157JU, has been matched to this LSOA: E01027928.** Where 0 equals lowest and 100 equals highest ranked crime rate.

Crime Type	Rank
All Crime & ASB	95.325
All Crime (No ASB)	94.841
Anti Social Behaviour	95.336
Burglary	82.233
Robbery	92.800
Vehicle Crime	86.802
Violent Crime	86.908
Drug Crimes	94.049
Criminal Damage & Arson	97.486
Shoplifting	96.598
Other Theft	86.220
Other Crime	91.632
Bike Theft (from May 2013)	82.655
Theft From the Person (from May 2013)	89.333
Possession of Weapons (from May 2013)	97.461
Public Order (from May 2013)	92.430

Figure 1: LSOA E01027928 percentile ranking by crime type

Having spoken with the local Neighbourhood Policing Team, they report that the area suffers from a higher than-average number of anti-social behaviour and burglary complaints which are often linked to houses of multiple occupancy (HMO). Many of the HMOs visited by the police have poor standards of security which render the occupants at an increased risk of becoming victims of crime. As the occupants of HMOs do not own the property it is often difficult for them to adopt any crime reduction recommendations made by the police after a crime has taken place. Statistically, the likelihood of being a *repeat* victim of house burglary in England & Wales increases exponentially unless crime reduction measures are adopted (Tseloni et al., 2018).

Secured by Design' (SbD) 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. 'Secured by Design' is 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, Building Control Departments in England (Part Q Security – Dwellings), Scotland (Building Standard 4.13) and Wales (Part Q Security – Dwellings) all reference SBD.

Secured by Design (SBD) is a place-based approach to crime reduction that brings together standards of physical security with the broader principles of Crime Prevention Through Environmental Design (CPTED) to set minimum requirements that enable properties to be awarded SBD status. The results of several studies have shown that housing design plays a key role in influencing offender decision-making, the risk of surveillance and standards of physical security being primary deterrents (Armitage & Tompson, 2022).

## **Access control and door entry systems**

Smaller developments containing 25 or less, apartments, bedsits or bedrooms should have a visitor door entry system and access control system. The technology by which the visitor door entry system operates is a matter of developer choice, however it should provide the following attributes:

- Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device).
- Vandal resistant external door entry panel with a linked camera.
- Ability to release the primary entrance door set from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation).
- Live audio and visual communication between the occupant and the visitor.
- Ability to recover from power failure instantaneously.
- Unrestricted egress from the building in the event of an emergency or power failure.
- Control equipment to be in a secure area within the premises covered by the CCTV system and contained in a lockable steel cabinet to LPS 1175 Security Rating 1 or STS 202 Burglary Rating 1.

## **Door sets**

All door sets allowing direct access into to the home, dedicated private flat or apartment entrance door sets, communal door sets shall be certificated to one of the following standards:

- PAS 24:2016 (Note 23.4b), or
- PAS 24:2022 (Note 23.4b), or
- STS 201 Issue 12:2020 (Note 23.4c), or
- LPS 1175 Issue 7.2:2014 Security Rating 2+ (Note 23.4d), or
- LPS 1175 Issue 8:2018 Security Rating A3+, or
- STS 202 Issue 10:2021 Burglary Rating 2 (Note 23.4d), or
- LPS 2081 Issue 1.1:2016 Security Rating B (Notes 23.4d and 23.4e), or
- STS 222 Issue 1:2021

## **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, etc). To address such problems SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation standard Technical Standard 009 (TS 009) or delivery 'through the wall' into a secure area of the dwelling. These should be easily accessible i.e. at a suitable height for a range of users.

Communal mail and parcel delivery facilities serving multiple flats or rooms should incorporate the following:

- External delivery facilities should be positioned adjacent to the entrance area
- Internal delivery facilities should be positioned within an entrance area with access control
- Access control to this area should have a data logging facility
- An air-lock entrance arrangement as part of the access control strategy would meet the Secured by Design criteria

- Both internal and external delivery areas should be comprehensively covered by CCTV
- Mail and parcel delivery boxes should be equipped with high security cylinders that are not subject to master key access
- Mail and parcel delivery boxes should be of robust construction, should incorporate an anti-fishing design and be fire resistant
- Individual letter boxes shall have a maximum aperture size of 260mm x 40mm
- All delivery boxes must be installed in accordance with the manufacturer's specification
- A secure system of depositing parcels, such as the smart parcel boxes used by the major internet shopping companies, should be considered where appropriate

## **Windows**

All easily accessible (Note 24.2a) windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards:

- PAS 24:2016 (Note 24.2b), or
- PAS 24:2022, (Note 24.2b), or
- STS 204 Issue 6:2016 (Note 24.2c), or
- LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 24.2d), or
- LPS 1175 Issue 8:2018 Security Rating 1/A1, or
- STS 202 Issue 10:2021 Burglary Rating 1, or
- LPS 2081 Issue 1.1:2016 Security Rating A, or
- STS 222 Issue 1:2021

Note 24.2a: 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

## **External Lighting**

Where possible the lighting requirements within BS 5489-1:2020 should be applied. Developers are advised that there is further guidance available from the Chartered Institute of Building Services Engineers (CIBSE) and the Society of Light and Lighting (SLL).

Lighting is required to illuminate all elevations containing a door set, car parking and garage areas and footpaths leading to dwellings and blocks of flats. Bollard lighting is not appropriate as it does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.

Overall Lighting uniformity (U<sub>o</sub>) - 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 should be achieved.

External public lighting must be switched using a photo electric cell (dusk to dawn) with a manual override or via a Central Management System (CMS) for large scale developments. If LED light sources are used, then shorter burning hours can be programmed as no warmup time is required for the lamp.

Secured by Design has not specified PIR activated security lighting for several years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst the elderly) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.

24-hour lighting (switched using a daylight sensor formally called photoelectric cells) to communal parts of blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupation to save energy. This will normally include the communal entrance hall, lobbies, landings, corridors and stairwells and underground garaging facilities and all entrance/exit points. Technology exists in respect of energy efficient light dimming systems and other means of ensuring that security lighting is intelligently provided in the right quantities and only at the right time.

## **CCTV**

It is recommended that CCTV is installed as part of this development. For the purposes of this guide, the term Closed Circuit Television (CCTV) is used to describe all video surveillance systems capable of recording moving images or sound, from traditional CCTV systems with on-site or remote recording facilities to video doorbells that begin recording only when a doorbell is activated.

The purpose of a CCTV system and the results desired from it must be carefully detailed in the Operational Requirement so that an appropriate installation is identified and can be agreed upon with a prospective installer. Attendant problems that could detract from the success of a CCTV system should be identified and a solution to them sought at this early planning stage.

Although a CCTV system cannot address all aspects of security, it can form an invaluable element within a comprehensive security strategy if the specification and installation meet the users Operational Requirement.

CCTV 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 CCTV system, which does not need to be expensive.

Images of people are covered by the General Data Protection Regulation (GDPR), and so is information about people which is derived from images – for example, vehicle registration numbers. Most uses of CCTV will be covered by the Data Protection Act 2018, which is the UK's implementation of the GDPR, regardless of the number of cameras or how sophisticated the equipment is.

Specifiers are reminded that there will be a requirement for a data controller to ensure compliance with the GDPR. The data controller must ensure that all CCTV images that can be used to identify individuals are used, stored, and disclosed in line with the GDPR principles.

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 head lights and street lighting.
- Have a lockable steel cabinet for 'on-site' recording equipment or other hard drive units to one of the following standards:
  - LPS 1175 Security Rating 1 (A1), or
  - STS 202 Burglary Rating 1, or
  - SS314
- Identify each camera's location and record this information along with time and date stamping.
- Provide suitable methods of export and incorporate the required software to view the exported footage.
- Negatively impacted upon by lighting and landscape proposals
- Whether there is consideration for inclusion of comprehensive Operational use and Requirements Table
- Also, it is worth mentioning that the most important aspect of utilising CCTV is the quality of the system and its imagery.

CCTV cameras associated with visitor door entry systems covering communal entrances and internal lobby areas should be installed and be capable of providing images of persons that are clearly identifiable on smaller devices such as smart phones.

Ideally, CCTV systems should be monitored live 24/7 giving the ability to react to a situation as it occurs. However, this is not a requirement of Secured by Design for residential developments. Most CCTV systems are designed for recording images and for the post event investigation only, in which case nobody is required to monitor the activities live. Police recommend that images are stored for a minimum of 31 days.

Early discussions with an independent CCTV expert and potential installers can resolve a number of matters, including:

- monitoring and recording requirements
- activation in association with the intruder alarm
- requirements for observation, facial recognition/identification and automatic number plate recognition (ANPR)
- areas to be monitored and field of view
- activities to be monitored
- the use of recorded images
- maintenance of equipment and the management of recording
- subsequent on-going training of operatives
- Further advice, including the ICO CCTV Code of Practice is available at: [www.ico.org.uk](http://www.ico.org.uk)

## **Bicycle Security**

The area is particularly prone to cycle theft and any bicycle storage solutions should be constructed to the following 'Secured by Design' standards.

Bicycle parking will comprise of bicycle stands, anchor points, single and two-tier rack systems and dedicated lockers. The bicycle stands and rack systems, single or two tier, should be certified to one of the following standards:

- Sold Secure – SS104 Security Rating Bronze, or
- Element (Wednesbury) – STS 501 Security Rating TR1, or
- Element (Wednesbury) – STS 503 Security Rating TR1, or
- Warringtonfire – STS 205 Issue 6:2021 Security Rating BR1, or
- Warringtonfire – STS 225 Issue 1:2021 Security Rating BR1 (S), or
- Loss Prevention Certification Board LPS1175 Issue 8:2018 Security Rating A (A1)

Bicycle parking facilities should be limited to the storing of no more than seventy bikes; if larger numbers need to be stored at the same location, the facilities should be separated into discreet units and be subject to extra mitigating security measures as agreed with the Nottinghamshire Designing Out Crime Officer.

Standards for Public Cycle Parking is available at: [www.securedbydesign.com/images/05132-Cycle-Parking-andSecurity-Standards-June-2021-REV-6.pdf](http://www.securedbydesign.com/images/05132-Cycle-Parking-andSecurity-Standards-June-2021-REV-6.pdf).

## **Good Neighbour Policy**

It is essential that staff and the company itself listen to and respond to the concerns of neighbours in the spirit of being a good neighbour. It is important that neighbours know the 'Good Neighbour Policy' exists and have access to a copy along, with contact telephone numbers which are responded to outside of normal office hours.

This approach will prevent unnecessary feelings of frustration and escalation resulting in calls for service from the Police and Local Authority.

## **Summary**

The area suffers much higher-than-average levels of burglary, vehicle crime and damage. This will pose a higher-than-average risk to people who may be living at the address, but the measures set out above will assist in mitigating or reducing those risks.

It is therefore recommended that this development achieves the Secured by Design accreditation prior to occupation. The application process is online and can be found at:

<https://homesapplicationform.securedbydesign.com/>

Designing Out Crime advice is given free of charge without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours faithfully,

**Nick Butler MSc.,**

Nottinghamshire Police: Designing Out Crime & Architectural Liaison Officer,  
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**References:**

Tseloni, A., Thompson, R. and Tilley, N., 2018. *Reducing Burglary*. New York: Springer.

Armitage, R. and Tompson, L., 2022. The Role of Crime Prevention Through Environmental Design (CPTED) in Improving Household Security. In *The Handbook of Security* (pp. 909-930). Palgrave Macmillan, Cham.