



# Planning Application

## DOCOCO Report

**170-172 Commercial Road  
Newport  
NP20 2PL**

**Planning Reference  
24/0862**



Dear Newport Planning,

I am contacting you regarding planning the application 24/0862 170 – 172 Commercial Road, Newport, NP20 2PL. The proposed developed is for *'new shop front, conversion of first floor offices and roof spaces to create 5 no. Flats, conversion of part ground floor to provide a class a3 unit, car park alterations and associated works'*.

I have reviewed the development plans and associated documents through the Newport Planning portal. Should any of these drawings be revised with significant alterations to the building design, layout, and/or specification level can I please request these are forwarded on.

To support my recommendations around the design and layout, physical security requirements, and product recommendations I have reviewed the crime statistics for the ward area of Pillgwenlly, for a 12-month period between 1<sup>st</sup> October 2023 – 1<sup>st</sup> October 2024.

From a Policing perspective the development is located in the Newport County Borough Council area, within the Pill section and Pillgwenlly Ward. The Pillgwenlly ward is 1 of 4 wards covered by the Pill section.

The analysis of the statistics for the development location has focused on crime/incident types that could potentially pose a threat, risk, or harm to the development and users of –

<b>Crime/Incident Type</b>	<b>Section – Pill</b>	<b>Wards - Pillgwenlly</b>	<b>*Site – Commercial Rd</b>	<b>Demand % Ward v Site</b>
<b>Residential Burglary</b>	94	43	7	16%
<b>Commercial Burglary</b>	45	15	1	7%
<b>Public Order</b>	371	162	43	27%
<b>Criminal Damage</b>	376	149	19	13%
<b>Theft (non-shoplifting)</b>	212	82	9	11%
<b>Theft Shoplifting</b>	629	401	4	1%
<b>Vehicle Crime</b>	147	67	3	4%
<b>Bicycle Crime</b>	37	19	3	16%
<b>Anti-Social Behaviour</b>	751	356	66	19%

*\*Site indicates within close proximity (same street, nearby/adjacent streets/roads) of the proposed planning application.*

It is to be noted that the ward of Pillgwenlly is one of the highest crime/incident recording wards within the Gwent Policing area. The ward does place a high demand on policing and the incidents of crime/disorder do affect the surrounding community.

The application is for a retail outlet to the ground floor with residential properties above. Comparing crime/incident data from ASDA that is the closest comparable unit they have report 39 incidents (Total 401) of shoplifting accounting for 10% of the total incidents for the ward area between 1<sup>st</sup> October 2023 and 1<sup>st</sup> October 2024.

At this time whilst I do not object to the application, I would strongly recommend the below physical security measures are taken into consideration to protect, prevent, and reduce the potential for crime.



When offering crime prevention and physical security advice we take guidance and best practice from the range of guides supplied by Secured by Design (SBD). At present it is not known if the client is seeking Secured by Design accreditation for the development.

The below recommendations are provided in line with the current crime demand for the area and proposed use of the development.

## **Recommendations**

### **Layout –**

Overall, I am satisfied with the layout and orientation of the building and associated facilities.

The proposed carpark is under good surveillance from both Commercial Road and Francis Drive. At present Commercial Road is occupied by several shops and residential properties that overlook the parking area and main shop front. To the rear of the development Francis Drive offers surveillance from residential properties whilst both sides offer a high level of active footfall.

The proposed residential access is positioned off the carpark and provides a direct and intuitive access into the building. The entrance is under good surveillance from the carpark area and the adjacent streets of Francis Drive and Commercial Road.

The service yard to the is under good surveillance from Francis Drive and Albert Street.

### **Parking Bays –**

I would recommend that the parking bays are clearly marked indicated which spaces are for commercial and residential use. This will promote rule setting in the area and reduce the potential of spaces being mis-used.

### **Boundaries –**

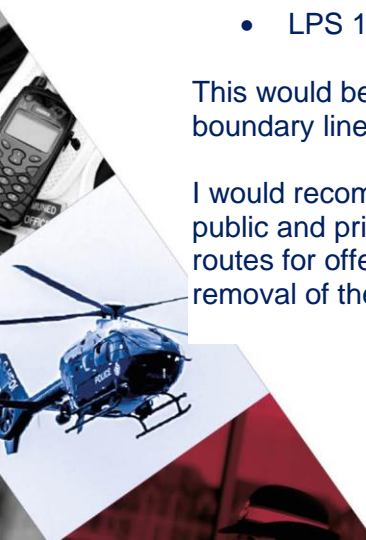
The boundary between the public and private space should be clearly defined. It is desirable that building frontages are open to view. Walls, fences, and or hedges should be kept to a maximum height of 1meter allowing surveillance across the boundary.

Vulnerable areas, such as exposed side and rear yards, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. Side or rear gates that form part of a rear or side boundary must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked (operable by key from both sides of the gate). Side gates must be located on or as near to the front of the building line as possible. As the development is located in a high crime area, I would recommend a palisade or weldmesh fence to a minimum-security standard of –

- LPS 1175 SR2

This would be required for the rear/side service yard and associated gates within this boundary line.

I would recommend that a 1.2m fence is placed around the carpark area to clearly define the public and private space. This will also remove the potential for desire lines and easy escape routes for offenders leaving the store. Below within 'Green Spaces' I have recommend the removal of the low bushes to reduce incidents of crime.



## **Green Spaces –**

The drawings indicate a small amount of green space within the carpark area including several bush lines and larger trees. Due to the crime/incident rate in the area including drug and knife crime I would recommend that bushes are not used as a boundary line. This is due to items being stored, concealed, and stashed within these bushes. Should a boundary line be required I would recommend a 1.2m metal hoop/ball top fence is used to define the public and private space.

Should shrubs be selected they should have a mature growth height no higher than 1 metre; trees should have no foliage, shoots, or lower branches below 2m thereby allowing a 1 metre clear field of vision. Defensible planting can be used along the boundary line to increase protection.

## **Lighting (external) –**

It is recommended that all external lighting meets the requirement of BS 5489-1:2020. It is recommended that all building elevations containing a doorset are illuminated along with communal/private parking areas and associated footpaths.

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. PIR lighting is not recommended as research has proven that a constant level of illumination in the form of dusk to dawn lighting is more effective.

For this development the carpark, shop frontage, service yard, and bike and bins stores should be full lit during the hours of darkness.

## **Doors –**

The development is proposed as retail (Commercial) to the ground floor, with residential to the first and second floors. Due to the high crime rate of the development location, I would recommend the below doorsets for the different areas of the development.

### *Retail (Ground Floor)*

It is recommended that all entrance doorsets (retail main entrance, side access, service access) are to the below minimum-security standard with the required fire and smoke attributes. This is due to the increase residential and commercial burglaries in the area along with associated criminal damage and ASB incidents –

- LPS 1175 Issue 7 SR2+
- LPS 1175 Issue 8 B3+
- STS 201 Issue 15 BR2
- STS 202 Issue 10 BR2
- STS 222 Issue 2 BR2
- LPS 2081 Issue 1 B+

Increased security rated doors provide increased burglary protection against enhanced tool sets and increased attack time.

It is important that the choice of door is fit for purpose. BS 6375-2:2009 specifies performance requirements for the operation and strength of manually operated internal/external pedestrian doorsets in their fully finished condition. In simple terms, this



means testing a doorset to ensure that it will withstand the demands of being opened and closed repeatedly over a significant period of time.

Should an access control system, door viewer, mail delivery system be fitted to the door as an additional feature it will have to be both tested and certified as a complete doorset and not retro fitted. Additional features to doors can compromise the overall physical security integrity and design.

### *Residential*

It is recommended that the communal entrance doorset (ground floor) is the to below minimum-security standard. This is the same standard as the commercial entrances. This prevents the vulnerability of the building shell being pushed onto the residential access and also considering the current high levels of crime rate in the area -

- LPS 1175 Issue 7 SR2+
- LPS 1175 Issue 8 B3+
- STS 201 Issue 15 BR2
- STS 202 Issue 10 BR2
- STS 222 Issue 2 BR2
- LPS 2081 Issue 1 B+

Increased security rated doors provide increased burglary protection against enhanced tool sets and increased attack time.

For the individual flats I recommend the doorsets are at minimum to the below standard –

- PAS 24:2022

It is important that the choice of door is fit for purpose. BS 6375-2:2009 specifies performance requirements for the operation and strength of manually operated internal/external pedestrian doorsets in their fully finished condition. In simple terms, this means testing a doorset to ensure that it will withstand the demands of being opened and closed repeatedly over a significant period of time.

Should an access control system, door viewer, mail delivery system be fitted to the door as an additional feature it will have to be both tested and certified as a complete doorset and not retro fitted. Additional features to doors can compromise the overall physical security integrity and design.

### **Windows –**

It is recommended that all windows are to the below minimum-security standard with the required fire and smoke attributes –

- PAS 24:2022

Increased security rated windows are also available that provide increased burglary protection against enhanced tool sets, these are –

- LPS 1175 Issue 7 SR1+
- LPS 1175 Issue 8 SR A1+
- LPS 2081 Issue 1 SR A+



- STS 202 Issue 10 BR1
- STS 204 Issue 9 BR1
- STS 222 Issue 2 BR1

It is important that the choice of window is fit for purpose. BS 6375-2:2009 specifies performance requirements for the operation and strength of manually operated windows in their fully finished condition. In simple terms, this means testing a window to ensure that it will withstand the demands of being opened and closed repeatedly over a significant period of time.

### **Access Control –**

For several parts of the development access control for dedicated doorsets is recommended (flat communal entrance, service yard, staff entrances). I recommend that this is an integral part of the doorset and not retro fitted. It is recommended that the complete doorset with any additional features (access control, door viewer, letterbox, etc) is certified and tested as a complete unit. This reduces the potential of any retro fitted items compromising the overall physical security and fire protection of the door.

Where required I would also recommend a video electronic access control system to allow remote access to an area and allow a capable guardian to verify access before entry.

### **Roller Shutters –**

I would recommend that roller shutters are installed to all commercial doorsets and windows of the development. Due to the increased residential and commercial burglary rate in the area along with associated criminal damage and ASB. This would add additional layers of protection to the building shell and increase detection time, along with delaying and deterring potential offenders.

I would recommend at minimum roller shutters for the development are to the below standard –

- LPS 1175 Issue 7 SR2+
- LPS 1175 Issue 8 B3+

### **CCTV –**

Although a CCTV system cannot address all aspects of security, it can form an invaluable element within a comprehensive security strategy as long as the specification and installation meet the users Operational Requirement. If CCTV is considered the below recommendations should be considered -

- 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 minimum standards:
  - LPS 1175 Issue 7 Security Rating 1+, or
  - STS 205 Issue 7 Burglar Resistance BR1, or
  - Sold Secure SS314 Bronze



- 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

The below requirements should also be met regarding installation, monitoring, and maintenance.

- Installed to BS EN 62676
- Managed to BS 7958:2015, and
- Monitored to BS 8418:2021

I would recommend that CCTV is installed covering all of the carpark, associated walkways, shop front, all areas inside the shop, service yard, residential entrance, and residential communal space.

### **Cycle Store –**

Currently there are two proposed cycle stores for the development. One is residential use located north of the carpark, whilst the second is located within the service yard for commercial use.

I would recommend that both cycle store are from accredited Secured by Design Companies and have been third party tested and certified. A list of approved companies and products can be located from the accredited product search on the Secured by Design website, link provided below.

Secured by Design approved product search - [Secured by Design - Bicycle Storage](#)

### **Refuse Store –**

The external refuse store doorsets should be fitted with automatic closers to prevent them from being left open and therefore the area insecure. Appropriate ventilation must be designed into this area to avoid doors being left open for this purpose. It is recommended that the bin store door should be lockable as this prevents the bins being used as climbing aids, weapons, or arson.

### **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.

### **Site Security –**

Unfortunately, during the build process developments can be vulnerable to crime due to the materials, products and machinery stored on site. Guidance around site security can be found through the Secured by Design Construction Guide –

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

Recent developments (residential) in the area have been a victim of crime which has required them to provide onsite security during the build phase. I would recommend either the installation of a monitored CCTV system, or onsite security during non-operational times to detect, deter, and prevent incidents from occurring.

**Further information –**

If you have any question regarding the comments above please contact me on the details provided or refer to the Secured by Design Homes Guide 2024 and Commercial Guide –

[SBD Homes Guide](#)

[SBD Commercial Guide](#)

If you have any further questions, please do not hesitate to contact me to discuss, thank you.

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