

Designing Out Crime: Planning Application

Location

**220 Caerleon Rd,
Newport
NP19 7GQ**

26/0019



Dear Newport
Planning,

I am contacting
you regarding
planning

application 26/0019 – 220 Caerleon Road, Newport NP19 7GQ. The proposed application is for **‘CHANGE OF USE FROM A 3 BEDROOM DWELLING (C3 USE) TO A 5 BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE) INCLUDING THE ERECTION OF A SINGLE-STOREY REAR EXTENSION’**

I have reviewed the development plans through the Newport Planning portal reference 26/0019. 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 (St Julians) and specifically the proposed development site location of Caerleon Road for a 12-month period between 01/02/2025-01/02/2026

From a Policing perspective the development is located in the Newport County Borough Council area, within the Maindee section and the ward area of St Julians. St Julians is one of six Wards within the Maindee 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 –

Crime/Incident Type	Section - Maindee	Ward - St Julians	*Site – Caerleon Rd	Demand % Ward v Site
Anti-Social Behaviour	825	200	10	5%
Residential Burglary	102	27	2	7.4%
Criminal Damage	467	101	7	6.9%
Theft(non-shoplifting)	209	35	3	8.5%
Vehicle crime	281	53	5	9.4%
Bicycle Crime	22	6	1	16.6%

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

I note that this development is proposed to be used as an HMO. At present there is currently no other HMO property within a 50-meter radius of the proposed development.



Policy Support:

- The Crime & Disorder Act 1998 created a statutory partnership between local authorities, the police and other key partners to work together in reducing crime and disorder in all aspects of their work.
- Section 17 of the Act states:
 - “It is the duty of the authority to exercise its various functions with due regard to the likely effect on crime and disorder in its area and the need to do all that it reasonably can to prevent crime and disorder.”
- TAN 12 Design. Para 5.17.1 “Local authorities are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998. Consideration should be given to practical ways in which the design of development can reduce opportunities for crime, disorder and anti-social behaviour.”

Planning Policy Wales

- 4.10.12 Local Authorities under Legal Obligation to consider the need to prevent and reduce crime and disorder.
- 8.2.1. – Transport – Provision of safe, convenient and well signed routes
- 9.1.1. –Housing – Objective to provide homes that are in good condition, in safe neighbourhoods and sustainable communities
- 9.1.2. Housing – Greater emphasis on quality, good design, and the creation of places to live that are safe and attractive.

Should the Planning Committee approve the application, we would respectfully ask that a condition is set as part of the Planning Terms and Conditions, to ensure that the following recommendations are put in place. This will ensure that all legal requirements are met and the premises will be run in the most efficient and appropriate manner.

Recommendations:

(i). Landlord/Agent

- The Landlord/Agent **MUST** comply with the following -
 - 2.33 The Housing (Wales) Act 2014 makes significant changes to legislation affecting public and private housing in Wales.
 - 2.34 Under the Act landlords and agents must comply and become registered and licensed via Rent Smart Wales (www.rentsmart.gov.wales). This will mean that:
 - all private landlords who have a rental property in Wales must register themselves and the addresses of their rental properties in Wales.
 - landlords who undertake defined letting or property management activities at a rental property in Wales must become licensed. If a landlord instructs an agent to do such work on their behalf, it is that agent who must become licensed.
 - in order to get a licence a person must be adequately trained and declare themselves ‘fit and proper’.
 - licensing training must be through approved training courses delivered by authorised training bodies

REASON: To comply with legislation and be accountable to tenants and other services.

I have reviewed the documents on the planning portal and have not located a management plan for the property.

Management Plan

The Landlord should have a Management Plan in place:

- Appropriate Fire Risk Assessments are in place and include adequate fire warning and prevention measures.
- Neighbours are provided with contact details for the management company.
- Weekly Visual Check
- Monthly Property Check

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). Whilst the client is not seeking SBD accreditation for the development I have made recommendations below for the site.

Front Boundary

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

Green Spaces

Shrubs should be selected to 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 (Doorsets)

It is recommended that all main entrance doorsets (front and rear) are lit. The use of PIR (reactive) lighting is not promoted by SBD. Dusk to dawn lighting will be required to all entrance doorsets.

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.

Doors

It is recommended that front and rear doorsets, are to the below minimum-security standard with the required fire and smoke attributes –

- PAS 24:2022+A1:2024* (Note 23.4c),

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

- STS 201 (certified to PAS 24:2022+A1:2024*) (Note 23.4d), or
- LPS 2081 Issue 1 Security Rating B+ (Note 23.4e), or
- STS 222 Issue 4 Burglar Resistance BR2(S) (Note 23.4e), or
- LPS 1175 Issue 8 Security Rating A3+ (Note 23.4b), or



- STS 202 Issue 12 Burglar Resistance BR2 (Note 23.4b), or
- LPS 1673 Issue 1 Attack Rating AR.A180+ (Note 23.4b)

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.

Reason: To prevent burglary and unauthorised access.

Access control

A communal entrance doorset that serves 5 to 10 dwellings (inclusive), is required to have a visitor door entry system and an access control system to enable management oversight of the security of the building.

- Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.)
- Vandal resistant external door entry panel with a linked camera
- Ability to release the primary entrance doorset from the dwelling or bedroom, if the building is not permanently managed by staff (in the case of student accommodation or House in Multiple Occupation)
- Live audio/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
- Capture (record) images in colour of people using the door entry panel and store images for as long as is necessary. The system should have the capacity to store images for at least 30 days. If the visitor door entry system is not capable of capturing images, then it shall be linked to a VSS or a dedicated surveillance camera shall be installed for this purpose. This information shall be made available to police within 3 days upon request
- All visitor and resident activity on the visitor door entry system shall be recorded and stored for as long as is necessary. The system should have the capacity to store images for at least 30 days. This information shall be made available to police within 3 days upon request
- Control equipment to be located in a secure area within the premises covered by the VSS and contained in a lockable steel cabinet certified to one of the following minimum standards, or above:

Current standards:

- STS 225 Issue 2 Burglar Resistance BR1(S), or
- STS 205 Issue 8 Burglar Resistance BR1, or
- LPS 1175 Issue 8 Security Rating A1+, or
- Sold Secure SS314 Bronze, or
- LPS 1673 Issue 1 Attack Rating AR.A60+
- SBD recommends the use of colour monitors to enable the occupier of the dwelling or bedroom with the identification of visitors or to assist the occupier to accurately describe the colour of clothing to the police of the perpetrators of anti-social behaviour or those otherwise misusing the system.
- Specifiers are reminded that the installed electronic release hardware must form part of the certified doorset range.

- In the event of a power failure door locks shall revert to a safe (unlocked) mode unless there is a fire evacuation policy in place that requires doors to remain locked, such as that operated within some care homes.
- Meet and greet is not SBD compliant in these circumstances. Occupants of dwellings shall be able to allow visitors access remotely at all restricted communal points on the designed route to their dwelling thereby meeting the requirements of Section 29. This includes lift controls that form part of the security compartmentation.
- In the event of a power failure door locks shall revert to a safe (unlocked) mode unless there is a fire evacuation policy in place that requires doors to remain locked, such as that operated within some care homes.
- Tradesperson or timed-release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

Windows

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

- PAS 24:2022+A1:2024* (Note 23.4c),

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

- STS 204 (certified to PAS 24:2022+A1:2024*) (Note 24.2d), or
- LPS 2081 Issue 1 Security Rating A (Note 24.2e), or
- STS 222 Issue 4 Burglar Resistance BR1(S) (Note 24.2e), or
- LPS 1175 Issue 8 Security Rating A1 (Note 24.2b), or
- STS 202 Issue 12 Burglar Resistance BR1 (Note 24.2b), or
- LPS 1673 Issue 1 Attack Rating AR.A60 (Note 24.2b)

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.

Easily accessible (*Note 24.17a*) glazing shall incorporate one pane of laminated glass certified to BS EN 356:2000 Class P1A, or above (*Note 24.17b*).

Easily accessible is defined within Approved Document Q of Building Regs as:

- a. a window or doorway, any part of which is within 2m vertically of an accessible level surface such as the ground or basement level, or an access balcony, or
- b. a window within 2m vertically of a flat or sloping roof (with a pitch of less than 30°) this is within 3.5m of ground level.

Reason: To prevent burglary and unauthorised access.

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 2081 Security Rating A, or
 - STS 205 Issue 8 Burglar Resistance BR1, or
 - LPS 1175 Issue 8 Security Rating A1+, or
 - Sold Secure SS314 Bronze, or
 - LPS 1673 Attack rating Ar.360
 - 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

Details can be found through the following link – Information Commissioners Office - [Information Commissioner's Office](#)

Sheds

Where sheds are provided for bicycle parking, they shall be certified to Sold Secure SS301 Bronze, or above and securely fixed to a suitable substrate foundation in accordance with the manufacturers' recommendations

Details of the sheds including specification level and company contacts can be found via the following links –

SBD Compliant Shed –

www.creatingenterprise.org.uk/en/home/Home - Creating Enterprise

The National Fire Chiefs' Council have produced fire safety guidance for e-bikes and e-scooters, which is available at: [E-bikes and e-scooters fire safety guidance - NFCC](#)

Reason: To prevent theft.

Bin Store

External bin store, plant room and/or substation doorsets shall be fitted with automatic closers to prevent them from being left open and therefore the area insecure. Appropriate ventilation must be designed into these areas to avoid doors being left open for this purpose.

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.

Loft hatches located in communal areas,

Loft hatches located in communal areas, such as over landings in blocks of flats, must be locked to prevent access into a dwelling via the loft space. This may still be required even where the loft space has been compartmented to prevent the spread of fire and smoke (products meeting the requirements of published fire safety standards are available). Loft hatches in communal areas shall be certified to one of the following minimum standards, or above:

Current standards:

- LPS 2081 Issue 1 Security Rating B+, or
- STS 222 Issue 4 Burglar Resistance BR2(S), or
- LPS 1175 Issue 8 Security Rating A3+, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- LPS 1673 Issue 1 Attack Rating AR.A180+

The responsibility for the specification and location of fire rated security products lies with the developer or the developer's agent (Responsible Person).

Reason: To prevent unauthorised access and to provide better protection for residents.

Mail delivery

- Internal delivery facilities shall be positioned within an entrance area with access control Access control to this area shall 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 shall be comprehensively covered by video surveillance
- Mail and parcel delivery boxes shall be equipped with high security cylinders that are not subject to master key access
- Mail and parcel delivery boxes shall be of robust construction, shall 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, shall be considered where appropriate
- Letter boxes certified to the Door and Hardware Federation's Technical Specification 009 (TS 009) offer reassurance that all of the above attributes have been met. In high crime areas TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter mail delivery i.e. arson, 'fishing' for personal mail.

Reason: To prevent theft and fraud

Fire Risk Assessment:

Appropriate Fire Risk Assessments are in place and include adequate fire warning and prevention measure.

Reason: To protect life



Further information -

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 \(securedbydesign.com\)](#)

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 2025 – [RESIDENTIAL GUIDE 2025 27325.pdf](#)

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

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