



Planning Application

**St Edward Street,
Stowhill
Newport
NP20 4GG**

26/0569

Dear Newport Planning,

I am contacting you regarding the planning of “*CHANGE OF USE FROM DWELLING (C3 USE) TO A 4 BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)*”

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 Stow Hill, for a 12-month period between 1st August 2025 – 1st August 2026.

From a Policing perspective the development is located in the Newport Council area, within the Central section. The Stow Hill ward is 1 of 4 wards covered Central 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 – Newport City Centre	Ward - Stow Hill	*Site – St Edward Street	Demand % Ward v Site
Residential Burglary	219	47	3	6.3%
Criminal Damage	879	245	6	2.44%
Theft (non-shoplifting)	482	181	5	2.76%
Vehicle Crime	450	88	3	3.4%
Bicycle Crime	83	38	1	2.6%
Drugs	638	115	4	3.47%
Public Order	2323	491	7	1.4%
Anti-Social Behaviour	2107	30	13	43.3%

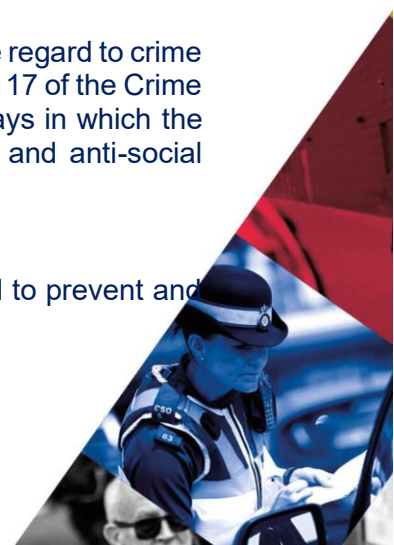
**Site indicates within close proximity (same street, nearby/adjacent streets/roads) of the proposed planning application.*

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

(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.

If this accommodation is approved, I recommend that the following conditions are also added to the **Management Plan**

- The staff who manage the site are vetted.
- The Manager is acquainted with the Crime and Reduction Officer(CADRO) for the area, as this will help to build a good working relationship with the local Police.
- In addition to the above, it is recommended that neighbouring residents are provided with a contact number for the Manager and staff so that any issues can be raised immediately and a solution found at the earliest opportunity. This will help to prevent any possible neighbour disputes and promote good neighbour relationships between all parties.
- Providing a secure facility for housing CCTV hardware.
- Appropriate Fire Risk Assessments are in place and include adequate fire warning and prevention measures.
- Weekly Visual Checks
- Monthly Property Checks

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 it is unknown

if the client is seeking SBD accreditation for the development, I have made recommendations below for the site.

Recommendations

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.

Side and Rear Boundary

Vulnerable areas, such as exposed side and rear gardens, 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. It is recommended a wooden boundary fence has the following requirements –

- The method of fixing between panel/rails and posts should create a secure mechanical bond so that panels/slats cannot be easily removed.
- The fixings employed in the panel/pale to rail construction should be of galvanized steel or stainless steel with a design life to match the timber components.
- Posts should be of a non-brittle material.
- Where the fence panel is of a slatted design, they should be oriented vertically to avoid step-up points for climbing. Panels should be no less than 15mm thick, fitted flush across the attack face to resist them being pried off and they should be securely affixed to the frame/rails.
- Fencing panels or railings mounted on a wall should be located as close to the outer (external) face of the wall as possible to eliminate climbing opportunities or use as informal seating.

Fence heights should be of a minimum 1.8m overall and be capable of raking/stepping to maintain height over different terrain.

Signage

Clear and prominent signage should be used to direct users around the site. This will include the indication of visitor bays, property locations, and/or refuge areas. The signage should be vandal proof and ideally made from metal. Signage increases and promotes rule setting in an area and reduces the opportunity for users to access unauthorised areas.

Lighting external (Communal areas)

All communal areas including footpaths and access routes are illuminated to BS 5489:1-2020.

All external doorsets for the development including communal areas, front, rear, refuse/bicycle store and main entrance doors be illuminated.

It is recommended that this is in the form of dusk to dawn lighting providing a constant light level during the hours of darkness. **PIR (re-active) lighting is not supported by SBD.**

Bollard lighting can be used by only as a wayfinding method. It is not permitted to be used as a primary light source as it does not provide the required coverage.

Lighting Internal (Communal areas)

It is recommended that 24 hour lighting(switched using a daylight sensor formally called photelectric cells) to communal parts of the building 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.



Light fittings and CCTV should be protected where vulnerable to vandalism.

Parking Bays

Parking bays should ideally benefit from good natural surveillance, for example being overlooked by the clear windows of public buildings and private dwellings.

Parking bay surrounded by vegetation or other obstructions (such as utility boxes) may provide cover for suspects to interfere with vehicles. Encroaching or uncontrolled undergrowth can hinder natural surveillance, restrict access for the car user, impact on the fall of light from nearby columns and can also hinder any video surveillance coverage. Shrubs shall be selected to have a mature growth height no higher than 1 metre; trees shall have no foliage, shoots or lower branches below 2m thereby allowing a 1 metre clear field of vision.

It is recommended that lines are marked illustrating the parking bays.

Doors

All external doorsets, are to the below minimum-security standard with the required fire and smoke attributes –

- PAS 24:2022+A1:2024

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*), or
- 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+

At present the area does not indicate the requirement for a doorset with an increase physical security rating. There has been limited reported incidents of residential burglaries in the proposed development area over the past 12 months.

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.

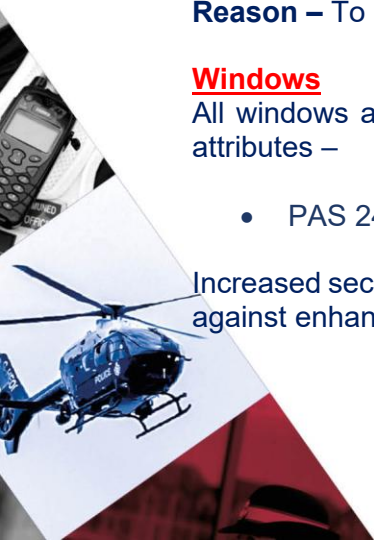
Reason – To prevent unauthorised access and to provide better protection for residents.

Windows

All windows are to the below minimum-security standard with the required fire and smoke attributes –

- PAS 24:2022+A1:2024*

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, or
- LPS 2081 Issue 1 Security Rating A, or
- STS 222 Issue 4 Burglar Resistance BR1(S), or
- LPS 1175 Issue 8 Security Rating A1, or
- STS 202 Issue 12 Burglar Resistance BR1, or
- LPS 1673 Issue 1 Attack Rating AR.A60

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*).

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

Refuse Store

It is recommended store doorsets should be fitted with automatic closures 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. It is recommended that the bin store door should be lockable as this prevents the bins being used as climbing aids, weapons or arson.

External Bicycle Store

- External bicycle parking facilities will be located as close to the primary entrance as possible, and in any case within 50m of it and be subject to natural surveillance by occupants where feasible. Current video surveillance systems shall be extended to ensure that this parking facility is within view of the cameras
- During the hours of darkness the facilities shall be well-lit, using energy efficient lamps.
- It is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of any bicycle storage facilities and/or other areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion powered vehicles have been considered and specified.
- The National Fire Chiefs' Council have produced fire safety guidance for e-bikes and e-scooters, which is available at The Bicycle Association and Cycle Rail Working Group, including Secured by Design, have published a UK quality and security standard for public cycle parking which is available at: [E-bikes and e-scooters fire safety guidance - NFCC](#)
- The Bicycle Association and Cycle Rail Working Group, including Secured by Design, have published a UK quality and security standard for public cycle parking which is available at: [05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf](#)

Reason – To prevent theft.

Mail



Should a communal mail delivery system be adopted the following requirements are recommended -

- External delivery facilities shall be positioned adjacent to the entrance area
- 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.

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

As the CCTV cameras will be capturing users' personal data. The location will need to be registered with the Information Commissioners Office for data protection requirements. Details can be found through the following link –

Information Commissioners Office - [Information Commissioner's Office \(ICO\)](#)

Electric sockets and USB charging in communal areas.

So as to discourage charging of mobile phones and any accompanying anti-social gatherings in communal areas, all 13-amp outlets or dedicated USB charging points intended for use by cleaners and building maintenance staff shall be capable of being key locked in the off position to prevent misuse. The installation and product types shall all comply with the appropriate requirements of BS 7671:2018+A2:2012 Requirements for Electrical Installations.

Loft Hatches

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).

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 Residential Guide 2025 –

[RESIDENTIAL GUIDE 2025 27325.pdf](#)

Products and services

Secured By Design (the Police Preferred Specification) have worked with manufacturers, the construction industry and standards authority for many years to ensure that security standards are current and updated to keep pace with emerging trends. Further information around police approved suppliers of products and services can be found at [Secured by Design - Secured by Design](#)



If padlocks and chains are used it is recommended they meet appropriate security standards, e.g. Sold Secure. [Sold Secure - Security Product Testing & Approval](#)

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