



**STAFFORDSHIRE  
POLICE**

Vanessa Blake  
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Civic Centre  
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ST16 3AQ

Early Intervention & Prevention Unit  
Ground Floor, Block 9  
Staffordshire Police HQ  
Weston Road  
Stafford  
ST18 0YY

Date: 19/4/22

**Dear Vanessa Blake**

**Ref No:** 22/35765  
**Location:** Former University Halls of Residence, Stafford Education and Enterprise Park,  
Weston Road, Stafford, Staffordshire, ST18 0AB  
**Proposal:** Change of use from student accommodation to asylum seeker accommodation

The proposal has been reviewed with particular reference to Police CPI's Secured by Design guidance and in accordance with the recognised principles of Crime Prevention Through Environmental Design.

The following comments should be considered in the light of the following:

- Under the heading Promoting Safe and Healthy Communities, Para 91(b) of the NPPF states "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion."
- Under the heading Achieving Well-Designed Places, Para 127(f) of the NPPF states "Planning policies and decisions should ensure that developments create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."
- Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
- Stafford Borough Council guidance in Policy N1 Design: Require the design and layout of new development to be safe, secure and crime resistant, by the inclusion of measures to address crime and disorder through environmental design and meet "Secured by Design" Standards; Paragraph 12.8 of the local plan states developers should ensure that 'Secure by Design' principles are incorporated within all development schemes;
- The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998;
- The 2006 CABE document entitled 'Design and Access Statements: How to Write, Read and Use Them', which states "Statements should demonstrate how development can create accessible and safe environments, including addressing crime and disorder and fear of crime."

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**Staffordshire Police have no objections to this application, but would like to raise the following:**

**As stated in the DAS Serco have emphasised to importance of the Health & Safety and Safeguarding of the occupants and the local community is of utmost priority. Staffordshire Police would echo this.**

Staffordshire Police note the number of objections from within the local authority. This may result in some community tension, bearing this in mind, it is strongly recommended the grounds and the building are made as secure for the safety and well-being of the occupants.

The communication between Serco management and Staffordshire Police and The Fire and Rescue Service is vital, so we can work together to prevent any tensions arising within the occupants themselves and the local community.

The building is located opposite the tennis courts and the leisure centre car park, the car park is an open space car park, with no perimeter boundaries. The car park also extends across the tennis courts, via the shared drive.

The main entrance to the residential blocks is via an open archway, this is a main concern for this application as this leaves the building easily accessible, enabling unauthorised access to the inner communal space and approach to the occupants. All doors will be access controlled with limited access, to the relevant block or corridor, so unauthorised access will not be permitted to the residential blocks themselves.

### Security

The plans do not mention any additional security for the building, however, the following are recommended.

- The existing entrance to the residential blocks, as previously mentioned, is via the archway. It is recommended the archway is enclosed, with restricted access only. This should be created into a lobby area, where only permitted visitors are allowed entry by the management team or by an occupant themselves. This will provide an additional element of security.
- It is recommended the communal entrance doors, especially at the newly created lobby, are certified to LPS 2081, which provides additional safety to both the occupants and the employees.
- All external and internal doors and the cycle stores should have auditable access control, for each member of staff and each occupant, with occupants restricted to their own block and floor.
- All the on-site management should be fully aware and trained in the emergency plans and policies in dedicated to this site, which should include the encroachment of the site by members of the public who may have malicious intentions, as well as occasions where the occupants may act inappropriately.
- All support staff will be Serco employees or from approved partner agencies, whose presence will be to help support, and assist with the wellbeing of the occupants. It is recommended that there should be at least one member of staff on duty at all times, who is Security Industry Authority (SIA) trained. Therefore, they will have the knowledge on how to correctly approach any situation, whether that be amongst occupants or if any community tension arises.
- CCTV is recommended for the perimeter of the site, especially the approach to the building and all entrances, to cover side vehicle entrance and the cycle storage areas. CCTV should be installed to cover all communal areas, especially the main entrance lobby area and the internal communal green space, this would be especially useful if ever there were issues amongst the occupants.
- It is recommended installation of a 1.8m welded mesh fence certified to LPS 1175 SR2, where the existing design layout permits. However, it is highly recommended the entrance to the side car park, the sides and the rear perimeter of the building are fenced with a gated access to the side car park, restricted to employees or partner agencies. This should prevent any unauthorised entrance to the grounds, ensuring the safety of both the occupants and the staff.
- The existing cycle stores, are enclosed brick stores with railings on two sides, with a gated access point. Access to the stores should be restricted, preferably linked to the access to the building, so all access is auditable.

### Personal Safety

- It is noted that the building itself will have compartmentation within the residential blocks, with access restricted to individual blocks and floors. The families will form their own clusters, and will stay together in their own family units. Families will be separated from the single occupants, and will only stay in the IA blocks. The single male and female occupants will also be separated by floor or block depending on demographic of the occupants, with short term accommodation in the IA block or the longer term stay in the DA blocks.
- Policies should be in place to safeguard all occupants, especially children and vulnerable persons who will stay within the accommodation.
- Safeguarding awareness sessions should be provided to all occupants regarding the risks of modern slavery, especially as whilst claiming asylum they are not allowed to work. Due to their circumstances, there may be a risk of exploitation be that labour, criminal or sexual exploitation, therefore awareness of these dangers is essential.
- Staff should undergo some Prevent awareness training, to enable them to spots the signs of suspicious behaviour.

### Community Tension

- There are some community concerns of the location of the building and the close proximity to Weston Road High School, Veritas Primary Academy School & Nursery, as well as St Johns Primary Academy. There is no perceived risk to the children or the residents of Stafford. The police and the staff will be able to resolve any concerns if they arise.
- There is an assumption, that there will be an increase in crime with the arrival of the refugee asylum centre. There is no evidence to suggest this, this is due to the fear of the unknown.
- There was also mention of the loss of jobs for the locals, the asylum seekers are not allowed to seek employment whilst they are making a claim.

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Kully Tanda  
Designing Out Crime Officer  
Staffordshire Police