

**SALFORD CITY COUNCIL**  
**SUPPLEMENTARY PLANNING DOCUMENT**  
**DESIGN AND CRIME**  
**ADOPTED 19<sup>th</sup> JULY 2006**

**STATEMENT OF MAIN ISSUES RAISED IN REPRESENTATIONS**

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)  
REGULATIONS 2004

**Regulation 18(4)(b)**

## **1 Introduction**

- 1.1 Under the Town and Country Planning (Local Development) (England) Regulations 2004, it is a requirement to prepare and publish a Consultation Statement for a range of planning policy documents including Supplementary Planning Documents (SPDs). This is a reflection of the Government's desire to 'strengthen community and stakeholder involvement in the development of local communities'.
- 1.2 This document is a statement of the main issues raised in representations about the draft Supplementary Planning Document, Design and Crime, and how these issues have been addressed in the SPD. It is prepared under Regulation 18(4)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004. This statement also incorporates details from the previous consultation statement, published in January 2006, under regulation 17(1), which details the consultations that were carried out in the preparation of the draft SPD.
- 1.3 In due course, the Council will be adopting a Statement of Community Involvement (SCI) that will set out how the public will be consulted on new planning policy and significant planning applications. Once the SCI is adopted, which is due to be in May 2008, planning documents will be required to conform to its provisions.
- 1.4 This Consultation Statement has been prepared in advance of the SCI, but aims to reflect the intentions of Government planning guidance for reporting on community involvement in the Plan making process. It describes the involvement of stakeholders, the community, voluntary organisations and statutory consultees in the preparation of the Design and Crime SPD.
- 1.5 The consultation process adopted meets both the minimum requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 and the gold standards in community involvement devised by Partners IN Salford.
- 1.6 The city council adopted the Design and Crime SPD in July 2006.

## **2 Gold Standards IN Community Involvement**

- 2.1 Partners IN Salford (Salford's Local Strategic Partnership) have devised 5 aspirational standards for community involvement and all partners of the Council are signed up to delivering community involvement in this way ([www.partnersinsalford.org/communityinvolvement](http://www.partnersinsalford.org/communityinvolvement)). The Gold Standard is a goal for partners to aim towards, particularly where there is activity or proposed change within the City that will have a significant impact upon local communities. They are:
- 1) Value the skills, knowledge and commitment of local people.
  - 2) Develop working relationships with communities and community organisations.
  - 3) Support staff and local people to work with and learn from each other (as a whole community)
  - 4) Plan for change with, and take collective action with, the community.
  - 5) Work with people in the community to develop and use frameworks for evaluation.

## **3 Background**

- 3.1 The city council has commissioned Urban Vision Partnership Ltd to produce an SPD for Design and Crime. The SPD has been prepared to give guidance on the design

and layout of the physical environment so as to reduce crime, the fear of crime and anti-social behaviour for the whole of Salford.

3.2 Urban Vision has led the ongoing consultation exercise that underpins the process of formulating the policies contained within the draft SPD.

#### 4 Initial Process of Community Involvement

4.1 A number of consultation exercises were undertaken prior to the preparation of the consultation draft SPD, in order to:

- Raise awareness of the role of the Design and Crime SPD;
- Engender discussion about the previous guidance contained within the SPG, how useful the SPG has been, whether the policies contained with the SPG were appropriate, and if the layout and format of the SPD needed revision;
- Seek the maximum contribution of ideas and options from local residents, businesses and other interested parties.

4.2 The consultation exercise included:

- A 2 hour preparatory and networking meeting was held with a focus group of architects and developers who frequently submit planning applications to the Council. The discussions held at this focus group were based around several themes:
  - Designing out crime in residential areas;
  - Designing out crime in commercial areas;
  - The importance of good design; and
  - Document format.
- A summary of the notes and issues raised at the meeting were posted out to all of the people who attended and a further 2 weeks was given for any additional comments to be provided.
- Preparatory meetings with a focus group of Development Control Officers.
- The distribution of a questionnaire relating to the previous SPG and the proposed SPD in relation to Design and Crime. This questionnaire was also made available through the City's website.
- A copy of the previous SPG was sent to the Police Architectural Liaison Unit with a request for their expert opinion on the content of the document and the layout.

4.3 Key stakeholders involved in this preliminary stage of consultation are listed in appendix A.

4.4 The main issues raised in the replies to the questionnaires and focus group held in September 2005 are identified below:

Comments Received	Council's Response
The scope of the document is acceptable but its layout should ensure that the document is user friendly.	The layout of the SPD has been modified to make it clearer and more user friendly.
More CCTV cameras should be erected.	Advice on the use of CCTV cameras is contained within the SPD.
The GM Police Architectural Liaison Unit provided additional guidance and details of groups and strategies relating to crime reduction.	The SPD has included additional information relating to the 'Secured By Design' initiative of Greater Manchester Police. Contact information for various other groups has also been included.

4.5 A series of documents were also provided by a consultant on behalf of some of the residents of Broughton Park. These documents outline the demographics of Salford

and in particular the Broughton Park area. The key issues are identified in the table below:

Comment's Received	Councils Response
<p>Within Broughton Park the perception is that they are treated as a low priority by the Police. As a response to this, a Broughton Park Citizen Patrol has been established by local residents. Guidelines are set out in the document which summarise the role and structure of the BPCP. It is suggested that this scheme should be developed further.</p>	<p>For information</p>
<p>Advantages and disadvantages of CCTV are discussed. It is concluded that CCTV is not a panacea for crime reduction. The role of the SPD in relation to CCTV is not discussed.</p>	<p>It is acknowledged that the erection of CCTV is not a complete solution to crime prevention and that various alternative measures may be more appropriate. The SPD considers a wide range of crime reduction measures.</p>
<p>The document also provides a risk assessment for home and property security and offers advice for residents with regard to securing their home. Much of the advice relates to behavioural issues, but some advice does relate to what security measures can be installed such as lighting and window security. Again, the role of the SPD is not discussed.</p>	<p>For information.</p>

4.6 The consultation networks established to date will continue to be used to guide other proposed SPDs.

## 5 Formal Public Consultation

5.1 The SPD documents were available for inspection at the following locations:

- On the council's website: <http://www.salford.gov.uk/designandcrimespd>
- Civic Centre, Salford City Council  
Chorley Road,  
Swinton, Salford, M27 5BW
- Emerson House, Albert Street, Eccles, M30 0TE. Opening times:  
Monday to Friday, 8.30am to 4.30pm.

5.2 The statutory consultees that were formally invited to comment by letter on the draft SPD are listed at Appendix B.

## 6 Representations Received

6.1 The following organisations/persons submitted representations within the formal public consultation period:

- Greater Manchester Police Architectural Liaison Officer
- Government Office North West
- Multi Agency Security Group

- Salford Community Safety Team
- Environment Agency

6.2 Appendix C sets out a detailed schedule of all representations, the council's responses and proposed changes to the SPD.

## **7 Main Issues Raised**

- 7.1 Inclusion of a lower trigger for new development: The trigger for when applications are referred to Greater Manchester Police Architectural Liaison Officer (GMP ALO) for consideration, and when Crime Prevention Plans are required, has been reduced from 1000sq m gross to 100sq m gross on the advice of GMP ALO.
- 7.2 Alterations to Policy DC14 - Lighting: This policy has been amended to take account of more recent guidance on lighting. The revised policy requires developers to contact the GMP ALO to ascertain what the relative crime risk for the area is in order for appropriate lighting classes to be derived as per table B.4 of BS 5489. From this information appropriate lighting levels can be determined. With regards to car parking, reference has been included to the standards in BS 5489. In addition a requirement has been added for lighting uniformity ratios to achieve 0.25 in areas of high crime risk (as determined by the GMP ALO).
- 7.3 Inclusion of guidance on the erection of security fencing in Greater Manchester: This has been provided by the GMP ALO and has been include in an appendix. It advises on the types and specification of fencing that should be used in different scenarios.
- 7.4 Alterations to Policy DC18 – Car Parking: This policy has been amended to take account of 'Planning for Town Centres: Guidance on Design and Implementation Tools', ODPM, 2005. The policy now highlights the preference for car parking to be located to the rear, underneath or on top of buildings to reduce their visual impact.
- 7.5 Inclusion of an additional policy on 'Building Fabric': This policy has been added to encourage the use of certified secure products. For example, reference is made to windows and doors satisfying the LPS 1175 and PAS024 standards.

## **8 Sustainability Appraisal**

- 8.1 In adopting the final draft, the council must consider how sustainability issues have been integrated into the document and how the Sustainability Appraisal has been taken into account.
- 8.2 Recommendations for changes to the consultation draft are included in the Sustainability Appraisal report that accompanies the SPD. None of the representations received questioned the content of the SA.
- 8.3 The appraisal has been amended to reflect the changes to policies made in response to other representations. It is considered that sustainability issues have been adequately addressed. The revised SA is published on the council's website ([www.salford.gov.uk/designandcrimespd](http://www.salford.gov.uk/designandcrimespd))

## **9 Equality Impact Assessment**

- 9.1 In accordance with the Race Relations (Amendment) Act 2000, a first stage Equality Impact Assessment has been carried out on the draft SPD. This concluded that a

more detailed appraisal was not required, as the SPD has no significant differential impact on any group.

- 9.2 The assessment is available on the council's website ([www.salford.gov.uk/designandcrimespd](http://www.salford.gov.uk/designandcrimespd))

## APPENDIX A

### LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION PRIOR TO PREPARATION OF CONSULTATION DRAFT

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION TO DATE	METHOD OF CONSULTATION	
	Focus Group Meeting	Questionnaire and letters
Architectural Liaison Officer Greater Manchester Police HQ		X
Philip Allsop Architects		X
Malcolm Lowe Architects		X
Stuart Levethall Architects		X
R A Fisk Associates	X	
Bernard Joseph Architects	X	
I Elton Architects		X
David Young Architects	X	
Robert Hodgson Architects		X
Acremoss Designs Ltd		X
JC Goodchild Architects		X
Jewish Forum		X
All Ward Councillors		X
Environment Agency		X
Countryside Agency		X
English Nature		X
English Heritage		X
CABE		X
GONW		X
NWRA.		X
GMP		X
Community Safety Team		
Multi-Agency Security Group		
Community Safety Forum		
Neighbourhood Manager – Claremont/Weaste & Seedley		X
Neighbourhood Manager – Ordsall & Langworthy		X
Neighbourhood Manager – East Salford		X
Neighbourhood Manager – Swinton		X
Neighbourhood Manager – Little Hulton & Walkden		X
Neighbourhood Manager – Irlam/Cadishead		X
Neighbourhood Manager – Worsley & Boothstown		X
Claremont Community Association		X
Worsley Village Community Association		X
Broughton Heights Residents Association		X
Boothstown Residents Association		X
Cliff Residents Association		X
Cliffside Homewatch and Residents Group		X
Duchy Road Residents Association		X
Ellesmere Park Residents Association		X
Lower Broughton & Cliffside Residents Association		X

Moorside South Residents Association		X
Whit Lane Residents Association		X
Roe Green Civic Trust		X
Worsley Civic Trust and Amenity Society		X

## **APPENDIX B**

### **STATUTORY CONSULTEES WHO WERE INVITED TO COMMENT ON THE DRAFT SPD (IN ADDITION TO THOSE LISTED IN APPENDIX A)**

Bolton MBC

Bury MBC

CABE

Central Salford Regeneration Company

Charlestown and Lower Kersal New Deal for Communities Partnership Board

Civic Trust (Northern Office)

Crime and Disorder Reduction Partnership

English Heritage

English Nature

GM Archaeological Unit

Government Office North West

Greater Manchester Ecology Unit

Greater Manchester Police Architectural Liaison Officer

Greater Manchester Geological Unit

Manchester City Council

North West Development Agency

North West Regional Assembly

Salford CAB

Salford Community Network

Salford Disability Forum

Sustainability North West

The Countryside Agency

The Environment Agency

Trafford MBC

Warrington BC

## APPENDIX C

### SCHEDULE OF RESPONSES TO CONSULTATION DRAFT

ORGANISATION	SUBJECT	CHAPTER	PARA	POLICY NO.	COUNCIL INTERPRETATION / RESPONSE	COUNCIL'S RESPONSE	PROPOSED CHANGES
Multi-Agency Security Group	Whole Document				At the meeting of the Multi Agency Security Group on 16th March, 2006, the Supplementary Planning Document was discussed. The Group fully supports the SPD and considers it is an excellent document. We now look forward to its full and effective implementation. Minor amendments have been suggested by the Community Safety Unit which is supported in principle by the MASG.	Comments noted	No changes proposed
Environment Agency	General Comments				DESIGN AND CRIME CONSULTATION DRAFT-SUPPLEMENTARY PLANNING DOCUMENT  Thank you for consulting the Environment Agency on the above Draft Sustainability Report for the Design and Crime (SPD).  We support the overall objectives outlined in the SPD, however on this occasion we consider that the report for Design and Crime SPD is unlikely to have any significant impact on the natural environment.	Comments are noted.	No changes are proposed.
Greater Manchester Police		02-Design and Crime and the need for this document	2.3		Delete the word "where" and replace with "wherever" after the wording "crime prevention measures" in paragraph 2.3 so that the paragraph reads:	The Council supports this amendment.	In accordance with the consultation response.

ORGANISATION	SUBJECT	CHAPTER	PARA	POLICY NO.	COUNCIL INTERPRETATION / RESPONSE	COUNCIL'S RESPONSE	PROPOSED CHANGES
					"2.3 Although this SPD is aimed primarily at new development, it is also of relevance to existing developments and owners and occupiers are encouraged to introduce crime prevention measures wherever appropriate and practical"		
Greater Manchester Police	Reasoned Justification	02-Design and Crime and the need for this document	2.14		<p>Insert the wording " and adequate lighting" at the end of the first sentence and delete the wording in the final sentence from "need to be avoided..." so that paragraph 2.14 reads:</p> <p>"2.14 Surveillance may be provided in a number of ways, for example through the avoidance of blank frontages; the positioning of doors and windows so as to overlook public spaces; a mix of uses that encourage activity throughout the day; the minimisation of visual obstacles; and the use of CCTV and adequate lighting. Rear gardens should normally be avoided adjacent to public spaces, because they provide no casual surveillance of places of concealment.</p>	The Council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	The Need for a Multi Agency Approach	02-Design and Crime and the need for this document	2.17		<p>Delete the wording "it is advised" and replace with "we strongly recommend" in the penultimate sentence of paragraph 2.17 to read:</p> <p>"2.17 Secured by design is a police initiative to encourage the building industry to incorporate crime prevention measures into the design of developments to assist in reducing the opportunities for crime and the fear of crime. Greater Manchester Police (GMP) offer certification for developments that satisfy the Secured by Design principles. Such a certificate can be used as evidence to show that</p>	The council supports this amendment.	In accordance with the consultation response.

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					all reasonable steps have been taken to design out crime within a development. DEVELOPMENTS, WHICH HAVE NOT TAKEN ACOUNT OF THE NEED TO DESIGN OUT CRIME, MAY BE REFUSED PLANNING PERMISSION. Therefore, we strongly recommend that GMP be contacted before any application is submitted. Their contact details can be found at the end of this document"		
Greater Manchester Police	The Need for a Multi Agency Approach	02-Design and Crime and the need for this document	2.18		In the second sentence of the paragraph replace the wording "advised that they are.." with "essential that they are" so that the paragraph reads:  "Applications that fall within the categories found below will be sent to GMP Architectural Liaison Unit for formal consultation. Therefore, it is essential that they be contacted for advice prior to the submission of any such application."	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Residential	02-Design and Crime and the need for this document	2.18		In the first bullet point under "Residential" replace "10 units" with "6 units" so that the bullet point reads: ".New housing estates, infill developments, flat developments and flat conversions where 6 units or more are created"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Office/Industrial/Warehousing	02-Design and Crime and the need for this document	2.18		Replace the figure "1000sq.m gross" with "1000sq ft gross" so that the bullet point reads:  "Any scheme where 1,000 sq ft gross or more of floor space is created"	The council supports the principle of this change but wishes to retain the use of metric measures. Therefore, the figure has been reduced to 100 square metres.	Replace the figure "1000sq.m gross" with "100sq m gross" so that the bullet point reads:  "Any scheme where 100 sq m gross or more of floor space is created"

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Greater Manchester Police	Retail	02-Design and Crime and the need for this document	2.18		Replace the figure "1000sq.m gross" with "1000sq ft gross" so that the bullet point reads:  "Any development or conversion resulting in 1,000 sq ft gross or more of floor space"	The council supports the principle of this change but wishes to retain the use of metric measures. Therefore, the figure has been reduced to 100 square metres.	Replace the figure "1000sq.m gross" with "100sq m gross" so that the bullet point reads:  "Any development or conversion resulting in 100sq. m gross or more of floor space"
Greater Manchester Police	Community Facilities	02-Design and Crime and the need for this document	2.18		Amend the word" creshes" to read " crèches." in the final bullet point so that it reads:  "Day nurseries/crèches"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Transport	02-Design and Crime and the need for this document	2.18		In the final bullet point add the wording"and multi story" so that the bullet point reads:  "All free standing and multi storey car parks"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Crime Prevention Plan	02-Design and Crime and the need for this document		DC1	Delete the figure "1000 sq.m" in the fourth bullet point and replace with "100 sq.m" so that the bullet point reads:  "Any retail scheme where 100 sq.m gross of floor space is created or three units is created"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Crime Prevention Plan	02-Design and Crime and the need for this document		DC1	Amend the 5th bullet point of Policy DC1 to read:  "All cash machines located within or outside a building in public space"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester	Crime Prevention	04-General Principles	4.3		Add the following to create a second sentence to paragraph 4.3 "All of these principles must be	The council supports this amendment.	In accordance with the consultation response.

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Police	Through Environmental Design				considered and implemented in any development" so that paragraph reads:  "4.3 The approach has at its core the following principles; defensible space; defined areas of influence (territoriality); and surveillance. All of these principles must be considered and implemented in any development"		
Greater Manchester Police	Defensible Space	04-General Principles	4.4		Amend paragraph 4.4 so that it reads:  "4.4 The idea behind defensible space is that the environment is divided into clearly defined areas which are either public, semi-private or private zones. Public zones are generally accessible to anyone and as such represent the least secure of the three zones, particularly when they are located near to a building as in the case of a footpath). Semi private zones serve to create a defensible buffer between public and private areas. They are less accessible to the public but design features establish definite transitional boundaries between the zones. A courtyard is an example of a semi private zone. Private zones are areas of restricted entry. Access is controlled and limited to specific individuals or groups. An example of a private zone is the area within a private dwelling"	The Council supports the changes to this paragraph although it does not support the inclusion of the word 'less' after accessible in the 4th sentence.	Amend paragraph 4.4 so that it reads:  "4.4 The idea behind defensible space is that the environment is divided into clearly defined areas which are either public, semi-private or private zones. Public zones are generally accessible to anyone and as such represent the least secure of the three zones, particularly when they are located near to a building as in the case of a footpath). Semi private zones serve to create a defensible buffer between public and private areas. They are accessible to the public but design features establish definite

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							transitional boundaries between the zones. A courtyard is an example of a semi private zone. Private zones are areas of restricted entry. Access is controlled and limited to specific individuals or groups. An example of a private zone is the area within a private dwelling"
Greater Manchester Police	Defensible Space	04-General Principles	4.5		Amend paragraph 4.5 so that it reads:  "Divisions between zones are usually defined by some type of barrier which can either be physical or symbolic. For example, a physical barrier can simply be a strong fence or some form of landscaping (this landscaping should not be so dense as to provide a hiding place for criminals). A symbolic barrier can incorporate several features such as a flowerbed or simply a change of surface material or colour on a footpath. The important requirement is that people are left in no doubt that a transition between zones has occurred. Well-defined defensible space empowers occupants to exercise responsibility and control over their environment"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Surveillance	04-General Principles	4.7		Delete the wording " the primary weapon" in the first sentence of paragraph 4.7 and replace with "an important mechanism" so that the first sentence of paragraph 4.7 reads:	The council supports this amendment.	In accordance with the consultation response.

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					"4.7 Natural Surveillance is an important mechanism in minimizing crime and complements the protection of a defensible space"		
Greater Manchester Police	Surveillance	04-General Principles	4.8		In the first sentence of paragraph 4.8 replace the word "informal" and replace with "natural" In the second sentence of para. 4.8 delete the word "Informal" and replace with "Natural" and add the wording "allowing open and natural surveillance opportunities" to the end of the second sentence so that it reads:  "Surveillance can take two forms; Natural and formal. Natural surveillance arises where designers minimise visual obstacles and eliminate places of concealment allowing open and natural surveillance opportunities"	The council supports the changes but with the following wording:  "Surveillance can take two forms; Natural and formal. Natural surveillance arises where designers minimise visual obstacles and eliminate places of concealment allowing open surveillance opportunities as people go about their normal daily lives"	As per council's response.
Greater Manchester Police	Surveillance	04-General Principles	4.9		Delete the following final sentence from paragraph 4.9:  "Designs that serve to socially/physically exclude individuals or groups who have a legitimate right to use an area or building should be avoided"	The council supports the removal of this sentence which is not seen as necessary.	In accordance with the consultation response.
Greater Manchester Police	Footpaths	05-Layout	5.1		Delete the first sentence of paragraph 5.1 and replace with:  "Footpaths should be located where they serve a justifiable purpose and will encourage use by all sectors of society. This must not however be interpreted as a measure to create excessive	The existing guidance in paragraph 5.1 is considered accurate and informative. However, it is considered appropriate to add "However, footpaths which do not	Add "However, footpaths which do not serve a reasonable purpose and which create conduits for crime should be avoided" after "pedestrian friendly cannot be overstated" so

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					permeability and provide footpaths which create conduits for crime"	serve a reasonable purpose and which create conduits for crime should be avoided" after "pedestrian friendly cannot be overstated"	that the paragraph reads: "The importance of providing people with secure environments that are well served by permeable routes which are safe, overlooked, well illuminated and pedestrian friendly cannot be overstated. However, footpaths which do not serve a reasonable purpose and which create conduits for crime should be avoided. Land use planning can play its part in achieving this sense of security by promoting good layout and design."
Greater Manchester Police	Front of Buildings	05-Layout		DC3	Policy DC3 to be amended to read: "New developments should normally be designed so that the main access to the building should be visible from the street and the front of buildings should front the most public side of the site"	The Council supports the principal of the change using the following wording:  "New developments should normally be designed so that the main access to the building is visible from the street and the front of buildings face the most	Amend Policy DC3 to read:  "New developments should normally be designed so that the main access to the building is visible from the street and the front of buildings face the most public side of the site"

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						public side of the site"	
Greater Manchester Police	Private Spaces Behind Buildings	05-Layout		DC4	The final sentence in the reasoned justification to Policy DC4 amended to read: "Where possible, they should be protected by a boundary whose security is commensurate with the location of the building".	The council supports this amendment as it highlights the importance of local context.	In accordance with the consultation response.
Greater Manchester Police	Picture 5.2	05-Layout			Picture 5.2 replace as it shows a poor example with obtrusive and problematic overhangs.	This photograph has been replaced with a more appropriate photograph.	Replace photograph.
Greater Manchester Police	Delivery Areas	05-Layout		DC7	Amend the first sentence of the RJ to read: Delivery areas pose an attractive target for criminals, particularly if no natural surveillance, e.g. gate house or formal surveillance such as CCTV is installed.	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Natural Surveillance	06-Building Design		DC8	Replace the following of the final sentence of the RJ:  Commercial buildings should be orientated so that all means of access are subject to some form of surveillance"  with:  "Commercial buildings should be orientated so that all means of access are subject to formal access routes which enhance good surveillance'	The suggested change reads in a confusing manner. The Council is of the opinion that the existing text is sufficient and clearly highlights the relevant issues that needs to be taken into account in designing secure access routes.	No amendments are proposed.
Greater Manchester Police	Picture 6.1	06-Building Design			Replace picture 6.1 as it shows a poor example of boundary treatment and lacks a door fronting the main road.	This photograph has been replaced with a more appropriate photograph.	Replace photograph

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Greater Manchester Police	Building Entrances	06-Building Design		DC9	<p>Policy DC9 should be amended to read:            "Each building should have a private entrance from the street where practicable. If communal entrances are unavoidable, secure access controls should be provided to restrict access to occupiers and authorised visitors"</p> <p>The final sentence of the RJ to Policy DC9 to be amended to read:            "In addition, secure entrances can be achieved through the use of, for example, intercom systems, CCTV, staffed security, key-pads and other robust access control systems".</p>	The council supports these amendments.	In accordance with the consultation response.
Greater Manchester Police	Extensions	06-Building Design		DC10	<p>Delete the word "normally" from the first sentence of the RJ to Policy DC10 so that it to reads:            In order to reduce the opportunity for criminal activity extensions should not obscure entrances...'.</p>	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Protecting Commercial Buildings	06-Building Design		DC11	<p>Amend Policy DC11 to read:            " The design of commercial buildings should incorporate measures to deter external attack. Additional measures should also be installed such as laminate glass, bollards and barriers "</p> <p>Amend the RJ with the wording "Design features such a stall risers can reduce unauthorised vehicular access through shop windows. Wherever possible consideration should be given to the use of certified enhanced security products, e.g. LPS 1175. Where roof lights are unavoidable, internal grilles should be used to prevent illegal access.'</p>	The council supports these amendments.	In accordance with the consultation response.
Greater Manchester Police	Picture 6.1	06-Building Design			Amend spelling mistake "preventing" after "Security shutters.." beneath picture 6.1	The council supports this amendment.	In accordance with the consultation response.

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Greater Manchester Police	Internal Design	06-Building Design		DC12	Amend Policy DC12 to read: "Where possible, sensitive areas and expensive equipment, e.g. dedicated IT suites within buildings should be located on upper floors"	The council is of the opinion that it is most appropriate to include examples within the Reasoned Justification, and not the policy text itself.	add (e.g. dedicated IT suites) after "expensive equipment" in the Reasoned Justification.
Greater Manchester Police	Security Shutters	06-Building Design		DC13	Add the wording "and internal grilles" after "Security shutters.." in Policy DC13	The council supports the inclusion of additional reference to grilles. However, the reference suggested would not read comfortably in the policy. Therefore, the policy and RJ have been re-worded to take account of grilles.	Reword policy and reasoned justifications to read:  Policy DC13 SECURITY SHUTTERS AND GRILLES  Security shutters and their housing boxes should normally be fitted internally. They should also be powder coated in an appropriate colour and perforated. Where grilles are deemed necessary, they should also be fitted internally and be powder coated in an appropriate colour. Security shutters and grilles should satisfy LPS 1175.  Reasoned Justification Security shutters or

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							<p>grilles may be appropriate where the risk of crime cannot be satisfactorily reduced by other measures. The design of shutters and grilles is, however, very important. Solid, faceless aluminium/steel shutters or grilles serve only to engender a fortress type atmosphere and provide a vulnerable target for graffiti. The Council will, therefore, normally require that shutters and grilles are powder coated with shutters also being perforated. Apart from being more attractive, shutters, if internally located and illuminated from behind, allow for surveillance from the street. External shutters, their housing boxes and grilles that stand proud of the front of buildings are not normally acceptable. This policy supplements Draft Replacement UDP Policy DES11.</p>

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Greater Manchester Police		07-Lighting		DC14	<p>Policy DC14 should be amended to read as follows:</p> <p>Within residential areas and subsidiary streets the ALU must be consulted to assess relative crime risk in order for appropriate lighting classes to be derived as per Table B.4 of BS 5489 part 1:2003 and supporting notes. This in turn will yield appropriate lighting levels in accordance with Table 3 of BS EN 13201 Part 2:2003. Generally shadowed areas and glare affecting visibility of lit areas should be avoided.</p> <p>Within commercial areas especially car parks, lighting should be provided to the levels set out in BS 5489 Part 9: 1996 Table 5 and should be operated from dusk to dawn. If there is a significant crime risk, as per consultation with the ALU, then the lighting uniformity ratio should not be less than 0.25.</p> <p>Lighting units should be... (as per the current draft)</p> <p>In the "Reasoned Justification" section the only amendments advocated are in line 4, ...windows, careful siting is necessary... to change to ...siting and orientation is necessary.</p> <p>In line 6 the words, ...The use of time switches and passive infrared... to change to include ...The use of time switches, photocells, passive infra red movement detectors and remote electronic monitoring systems can reduce the need for lighting to be on at all times or at full brightness at all times, which in turn...</p>	The council supports the principle of the changes requested.	<p>Policy DC14 has been amended to read:</p> <p>Within residential areas, the relative crime risk of the area shall be determined in consultation with the Greater Manchester Architectural Liaison Unit in order for appropriate lighting classes to be derived as per Table B.4 of BS 5489 part 1:2003 and supporting notes. This in turn will yield appropriate lighting levels in accordance with Table 3 of BS EN 13201 Part 2:2003. Shadowed areas and glare affecting the visibility of lit areas should be avoided.</p> <p>Within commercial areas and especially where car parking exists, lighting should be provided to the levels set out in BS 5489 Part 9:1996 Table 5 and should be operated from dusk to dawn. If, in consultation with the Greater Manchester</p>

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					<p>The reasoning for these amendments:</p> <p>1.The new code of practice has very specific guidelines that the local ALO should be able to express an assessment whether the area to be lit is likely to be "low" "moderate"or "high" based on local assessments, not National statistics. The original wording of 2.5 and 6.0 lux is too specific and refers to the old code of practice for moderate crime areas only.</p> <p>2 By including the words, "...and supporting notes" this allows for the request to use semi cylindrical calculation methods (details in the code) for particularly nasty areas - especially where the flavour of the crime is predominantly associated with violence. For most projects this would be overkill, but where needed at least you've got a documented case for it.</p> <p>3. I have put the bit about glare in for two reasons. Firstly tackling a crime issue with more light may raise resident's concern regarding intrusive light trespass issues and secondly glare towards resident's properties can adversely affect surveillance.</p> <p>4.With the car parks bit above I have used the recommendations of the BS but taken out the values from the original SPD document (15 and 5 lux) as these relate only to rural car parks.</p> <p>5.I have added the requirement for the 0.25 uniformity ratio for 2 reasons. Firstly the BS document only requires the uniformity to be greater than 0.20, this, in my experience really is very low for any crime risk area as visibility is far more a</p>		<p>Architectural Liaison Unit, a significant crime risk exists, then the lighting uniformity ratio should not be less than 0.25. Lighting units should be robustly constructed and carefully positioned so as to reduce the potential for vandalism.</p> <p>Landscaping should be designed appropriately and maintained to avoid lights being obscured or the creation of deep shadows.</p> <p>The changes to the reasoned justification have been amended as per the consultation response.</p>

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					<p>function of uniformity than it is of absolute lighting levels, therefore in high crime risk areas it really needs to be higher. I have chosen a value of 0.25 which whilst not really high enough in my personal opinion, can be justified by the fact that the draft document prEN 12464 part 2 is currently recommending this as a uniformity value for all car parks and (eventually) this is likely to become the lighting standard for car parks.</p> <p>6.I have included the word "orientation" because I have often experienced that the luminaire gets put in the right place but the angle at which it is installed makes a mockery of the original calculations and worse, annoys residents.</p> <p>7.I have added to the switching options to include for electronic monitoring systems, as this is likely to be the next big thing. The Institute Lighting Engineers has recently published a Technical Report on using variable lighting levels and the industry is now producing reliable electronics so it is now becoming a realistic option for developers. It also paves the way for interactive lighting, which might be ripe enough for mention in the next generation of this document.</p>		
Greater Manchester Police	Boundary Treatments	08-Boundary Treatments and Alleygating		DC15	<p>Reference should be made to the Guidelines produced by GMP ALU for the erection of fencing within Greater Manchester - see appendix B.</p> <p>Amend Policy DC15 to read: "Boundary treatments should maximize natural surveillance and should be designed to a high standard with consideration for providing visual privacy where appropriate"</p>	The council supports the inclusion of reference to the Guidelines produced by GMP ALU for the erection of fencing within Greater Manchester. This has been included in the reasoned justification to policy DC15 with the	Reference to the Guidelines produced by GMP ALU for the erection of fencing within Greater Manchester has been included in the reasoned justification to policy DC15 and the information has been

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					<p>Amend the third sentence of the first paragraph of the RJ to read:" Boundary treatments should normally be visually permeable, for example railings..."</p> <p>Add a final sentence to the end of the first paragraph of the RJ to read: "With regards to fences and railings, they should be powder coated in an appropriate colour so that they make a positive contribution to the character of the surrounding area. The use of protruded top railings can further deter climbing"</p> <p>Amend the final sentence of the first paragraph of the RJ to read: "With regards to fences and railings, they should be powder coated in an appropriate colour so that they make a positive contribution to the character of the surrounding area. The use of protruded top railings can further deter climbing"</p>	<p>information being contained in an appendix.</p> <p>The council is of the opinion that the inclusion of the words "with consideration for providing visual privacy where appropriate" is misleading. However, it is recognised that boundary treatments are sometimes used to create private spaces. Therefore, "where appropriate" has been inserted after "natural surveillance" in the policy text.</p> <p>The council supports the inclusion of the word 'visually' before 'permeable, for example..' in the reasoned justification.</p> <p>The council supports the inclusion of "The use of protruded top railings can help deter climbing" at the end of the first paragraph of the</p>	<p>provided in an appendix.</p> <p>"where appropriate" has been inserted after "natural surveillance" in the policy text.</p> <p>"visually" has been inserted before 'permeable, for example..' in the reasoned justification.</p> <p>"The use of protruded top railings can help deter climbing" has been inserted at the end of the first paragraph of the reasoned justification.</p>

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						reasoned justification.	
Greater Manchester Police	Perimeter Gates	08-Boundary Treatments and Alleygating		DC16	Amend Policy DC16 to read: " perimeter gates should be the same height as the boundary fence and should incorporate anti lift hinges and integrated locks"	The council supports the suggested amendment.	In accordance with the consultation response.
Greater Manchester Police	Alley Gating	08-Boundary Treatments and Alleygating		DC17	Amend the final sentence of the RJ to Policy DC17 to read:  "Recesses can also provide hiding places for criminals and so they should be avoided"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police	Traffic Calming	09-Parking andTraffic Calming		DC19	Add the following wording to the end of the reasoned justification to Policy DC19: "if lit, the design should be in accordance with the ILE document Technical Report 25, the lighting of traffic calming"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police		10-CCTV	10.1		Amend the para. 10.1 to include: "It must form part of a package of measures that serve to make for an integrated and collective approach. Important issues such as civil liberties, Data Protection and local acceptance also need to be taken into account when designing a CCTV scheme."  "Co-ordination between the CCTV and lighting proposals will maximise the night time benefits of both"	The council supports this amendment.	The third sentence has been amended in accordance with the consultation response. The latter sentence has been added to the end of paragraph 10.1.
Greater Manchester Police	Architectural Liaison Unit	11-Further Help and Advice	11.3		Amend the first sentence of para. 11.3 to read: "In particular, officers can also advise on both the Secured by Design award and Safer Parking Scheme Award"  Amend the final sentence of para. 11.3 to read:	The council supports these amendments.	In accordance with the consultation response

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					"A developer who receives one or both of these awards can subsequently use the Secured by Design and Park Mark logos in their promotional literature"		
Greater Manchester Police	Crime Reduction Advisors	11-Further Help and Advice	11.7		Amend the first sentence of para. 11.7 to read; "The ALO's and CRA's also promote Crime Prevention Through Environmental Design (CPTED) both internally and externally"	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police		12-Useful Contacts			Amend the e mail contact for The Architectural Liason Unit to: Useful contacts. "architecturalliaisonunit@gmp.pnn.police.uk"  Delete the details for to"The Business Security Co-ordinator.."  Amend the contact details for the Crime Reduction Advisors to: The Crime Reduction Advisors (Salford Division) 0161 856 5254/5421	The council supports this amendment.	In accordance with the consultation response.
Greater Manchester Police		09-Parking and Traffic Calming		DC18	Delete "Walls and fences surrounding parking areas should not normally be more than 1m high" and insert "with appropriate boundary treatments" after "should be restricted/controlled"  Also delete "at least one window of an adjacent property" from the reasoned justification and add "as many windows as possible" in its place.	The council supports the addition of the words "with appropriate boundary treatments". However, although the removal of the reference to boundary treatments is not considered necessary, it is seen as important to highlight the need for visual permeability. Therefore	The last paragraph of policy DC18 has been amended to read "Where possible, access to parking areas should be restricted/controlled with appropriate boundary treatments. Walls and fences surrounding parking areas should allow a high level of natural surveillance."

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						<p>the last sentence of the policy has been amended to take account of this.</p> <p>The council supports the insertion of "as many windows as possible" in the reasoned justification.</p>	<p>The reasoned justification has been amended to read "Parking courts can have a propensity to attract crime. The security of parking areas can be enhanced by ensuring that they are overlooked from as many windows as possible thus providing an element of natural surveillance. It is also important to ensure that landscaping does not obscure surveillance across parking areas. The use of low boundary treatments ensures that natural surveillance is maintained and prevents developments feeling hostile which can increase fear of crime. Parking should ideally have restricted access through the use of measures such as controlled barriers. "</p>
Government Office North West	Car Parking	09-Parking and Traffic Calming		DC18 (DC19 now)	Policy DC18 should have regard to the approach to car parking set out in paragraphs 2.9 to 2.11 of Planning for Town Centres: Guidance on Design and Implementation Tools, ODPM, 2005. This	The council supports the amendment of this policy to encourage the creation of parking areas to the	The policy has been amended to read: "Communal car parking

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					<p>indicates that car parking should normally be located to the rear, underneath or above new development so as to minimise visual impact. In addition, the photograph of car parking illustrating the policy, Picture 9.1, does not seem to accord with this approach.</p>	<p>rear, underneath or above development so as to minimise visual impact and use space as efficiently as possible.</p>	<p>should normally be located to the rear, underneath or, where designed appropriately, above new development. They should also be located so as to maximise natural surveillance, but without compromising building security.</p> <p>Where possible, access to parking areas should be restricted/controlled with appropriate boundary treatments. Walls and fences surrounding parking areas should be visually permeable to allow a high level of natural surveillance.</p> <p>Reason Justification Parking courts can have a propensity to attract crime. Where appropriate, the security of parking areas can be enhanced by ensuring that they are overlooked</p>

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							<p>from as many windows as possible thus providing an element of natural surveillance. It is also important to ensure that landscaping does not obscure surveillance across parking areas. Where surface level parking is necessary, the use of low boundary treatments ensures that natural surveillance is maintained and prevents developments feeling hostile which can increase fear of crime. Parking should ideally have restricted access through the use of measures such as controlled barriers.</p> <p>This policy supplements Draft Replacement UDP Policy DES11."</p>
Salford Community Safety Team	General Comments submitted in conjunction with ALU				<p>An additional two amendments to include:  * Lighting with wording to be 'In order to reduce the risk and fear of crime, it is essential that street lighting is commissioned prior to habitation of dwellings'.  * A recommendation for a new policy topic of 'building fabric' with wording to be 'In order to</p>	The council supports additional reference requiring all lighting schemes to be completed prior to first occupation of dwellings. Where this is necessary, a condition	<p>The following sentence has been added to the end of the reasoned justification:  "Furthermore, in order to reduce the risk and fear</p>

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					<p>compliment the principles of Crime Prevention Through Environmental Design, careful attention is required on the design and specification of the building fabric, e.g. windows and doors. The use, wherever possible of appropriate certified secure products such as windows and doors (e.g. LPS 1175 AND PAS024 standards) is strongly recommended. GMP Architectural Liaison Officers and Crime Reduction Advisors can advice on these items'.</p>	<p>will be attached to the approval of any planning permission.</p> <p>The council supports the inclusion of an additional policy on 'building fabric'. As such this new policy has been included in the 'Building Design Chapter'.</p>	<p>of crime, it is essential that lighting schemes are completed prior to first occupation of developments."</p> <p>The following policy has been added to the 'Building Design' chapter:</p> <p>"BUILDING FABRIC The type and specification of materials which make up the building fabric should, wherever possible, be certified secure products. In particular, windows and doors should satisfy LPS 1175 and PAS024 standards.</p> <p>Reasoned Justification In order to reduce crime and the fear of crime and to compliment the principles of Crime Prevention Through Environmental Design, careful attention is required on the design and specification of the building fabric. For</p>

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							further guidance developers are advised to contact the Greater Manchester Police Architectural Liaison Officers and Crime Reduction Advisors whose details can be found in the Useful Contacts section of this document."