



Crime Prevention Through Environmental Design Planning Response

Site Address – Stoke Lodge Sports Ground Shirehampton Road Sea Mills Bristol BS9 2BH	App. Ref – 25/14649/PINS
Development description – Application for Planning permission for Works to install 8no. CCTV poles and cameras.	Response Date – 26/11/2025
Designing Out Crime Officer – [REDACTED] Crime Prevention Unit Avon and Somerset Police, The Bridewell, 1-2 Bridewell Street, Bristol, BS1 2AA. [REDACTED] [REDACTED]	
Summary Response	
No Objection or comments	
No Objection – Subject to comments	X
Object in principle	
Not acceptable in its current format	

Detailed Response

I am a Designing Out Crime Officer (DOCO) with a responsibility for Crime Prevention Through Environmental Design (CPTED) projects within the Bristol area. As a Constabulary we offer advice and guidance on how the built environment can influence crime and disorder.

Paragraphs 96, 102 and 135 of the National Planning Policy Framework December 2024 require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 111, 113, 115, 117 and 125 also require the creation of safe environments within the context of the appropriate section.

The Bristol Development Framework Core Strategy (adopted June 2011) states that one of the overarching issues for ensuring a sustainable future is reducing the opportunity for crime.

The National Model Design Code produced by the Ministry of Housing, Communities & Local Government states that all schemes should aim to create a safe and secure environment and provide a sense of security for all users (paragraph 63).

Bristol Local Plan – Site Allocations and Development Management Policies – (Adopted July 2014) section DM28: Public Realm states that development should create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels

of activity and social interaction. Section 4 adds that development will be expected to: Reduce crime and fear of crime by creating a well-surveyed public realm that is well managed and cared for.

Section 17 Crime and Disorder Act 1998 places a duty on an authority to consider crime and disorder implications.

- Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,
 - (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and
 - (b) the misuse of drugs, alcohol, and other substances in its area and
 - (c) re-offending in its area and
 - (d) serious violence in its area.

(1A) The duty imposed on an authority by subsection (1) to do all it reasonably can to prevent serious violence in its area is a duty on the authority to do all it reasonably can to—

- (a) prevent people from becoming involved in serious violence in its area, and
- (b) reduce instances of serious violence in its area.

Below I have shown reported incidents for the period of one year (18.11.2024 – 18.11.2025) for an area of 400 metres x 400 metres centred on the site:

Offence Group	Crime Count
Theft	72
Violence Against The Person	20
Arson and Criminal Damage	9
Burglary	8
Vehicle Offences	6
Public Order Offences	5
Robbery	3
Fraud	2
Miscellaneous Crimes Against Society	1
Possession of Weapons	1
Sexual Offences	1
Total	128

I have viewed the planning application and have the following comments:

- The client has developed an Operational Requirement (OR) based on a standard premises CCTV security strategy. The Video Surveillance System (VSS – the current industry term) has been designed to meet these specific needs, with objectives as follows:
 - Provide VSS coverage primarily during daylight hours, but also 24/7 in day/night conditions.

- Ensuring coverage of the approach to the playing fields from the boundary and across the playing fields, enabling detection and observation of activity within the area.

The client advises that the VSS will generally be reactively monitored rather than proactively monitored. Recorded images should be retained for as long as necessary, with a minimum storage capacity of 30 days. It is essential that images are of 'identification' quality as defined in the Surveillance Camera Commissioner's CCTV Buyers Toolkit, to support any police investigation, particularly as incidents are more likely to occur out of hours when offenders seek anonymity.

All cameras will be equipped with intelligent video analytics to detect movement and generate alerts when activity occurs within the field of view.

The VSS must be fully compatible with the existing or planned lighting scheme and landscaping proposals. Landscaping should not obstruct natural surveillance and should complement both lighting design and VSS coverage. I strongly recommend including infrared (IR) lighting to achieve the best possible image quality during hours of darkness, supporting identification and potential prosecution.

- It is noted that the proposed VSS cameras will be subject to a Data Protection Impact Assessment (DPIA) and will comply with Cotham School's General Data Protection Regulation (GDPR) policies.

Access to live and recorded images must be restricted to suitably vetted, trained, and experienced personnel.

A designated data controller must ensure compliance with GDPR principles for the use, storage, and disclosure of identifiable images.

The VSS must be registered with the Commissioner's Office (ICO) and comply with Data Protection and Human Rights legislation. Further guidance; www.ico.org.uk

- Installation must also comply with BS EN 62676 (*Video surveillance systems for use in security applications*).

For evidential use and best practice:

- Follow BS 7958:2015 - *Closed circuit television (CCTV). Management and Operation. Code of practice*. These documents provide guidance for the operation and management of VSS where data may be used as legal evidence.
- Remotely monitored detector activated VSS must comply with BS 8418:2021 - *Design, Installation, Commissioning and Maintenance of Detection-Activated Video Surveillance Systems. Code of practice*.
- The client has confirmed that during the final commissioning of the system, all camera views will be checked to ensure compliance with GDPR, OR, and DPIA requirements. Privacy screens/zones will have been programmed where appropriate.

- Cameras are fixed view (not pan tilt zoom (PTZ)), which means they cannot be electronically repositioned to view private spaces. It is noted that operators will be trained in GDPR compliance and will understand privacy implications and that staff will also be trained to operate the system and provide recordings to police upon request.
- The supporting document titled "CCTV System Survey & Design Report" (page 14) states that the column is equipped with a small equipment cabinet located at the base of the column for cable connections etc.
- The document titled "Cabinet Based Pole" refers to the 'basic' AW1545 BAS cabinet based pole range.

Under Security Features, it lists (I have not listed each aspect):

- Close fitting flush doors
- Solid secure heavy duty door locks
- Internal padlock facility on tilt down poles to protect against unauthorised lowering.

Under General Features, it lists (I have not listed each aspect):

- Flush fitting door, level with cabinet surface, no external frame combined with flush fitting Altron secure locks giving enhanced security and a clean aesthetic appearance
- 4 point security door locking option.

However, the document does not specify any recognised security standard. While it references design, manufacturing, and finishing standards, see details on page 107. The document itself is only 2 pages long and lacks detail on security certification.

To ensure this cabinet is resistant to tampering, and in light of previous reports I recommend that it should meet LPS 1175: Issue 8, Security Rating B3 or higher. This would provide assurance that the cabinet meets an appropriate level of physical security.

- The developer is advised that signage should be displayed across the development (e.g., perimeter fencing) advising people that they are under surveillance. Details of who this is controlled by and for further information should also be included.
- VSS providers should be accredited by:
 - NSI - leading certification body for security and fire protection - www.nsi.org.uk
 - SSAIB - certification body for security systems - www.ssaib.org.uk

If there are any questions concerning these comments, then please feel free to contact me.



