



**WEST YORKSHIRE  
POLICE**

**West Yorkshire Police  
Kirklees District**

**Designing Out Crime Officer**

West Yorkshire Police  
Kirklees Council Planning Services  
Civic Centre 1  
High Street  
Huddersfield  
HD1 2NF

Tel: 101  
Council Offices: 01484 221000

To: Victor Grayson	Ref: 2019/90467 Date: 2 <sup>nd</sup> April 2019
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**Site Location: Former College buildings, Highfields Centre, New North Road,  
Huddersfield, HD1 5LS**

**Application Type: Conversion to 33 dwelling apartments**

Dear Victor

Thank you for your request for consultation for the above outline application. Having read the available information, I would like to offer the following comments;

The '*National Planning Policy Framework*' makes clear that developments should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

**Policy PLP24 of the Kirklees Local Plan 2019** supports the above statement and mentions that new developments should incorporate crime prevention measures to achieve:

**Section (e)**. – "*the risk of crime is minimised by enhanced security, and the promotion of well – defined routes, overlooked streets and places, high levels of activity and well –designed security features*";

This is in pursuance of the Council's duty under **Section 17 of the Crime and Disorder Act 1998**.

West Yorkshire Police encourages applicants to seek to build / refurbish a development incorporating the guidelines of **Crime Prevention Through Environmental Design (CPTED)**, together with **Secured by Design (SBD)**, a crime prevention initiative operated by the Police Service and supported by the Home Office.

[https://www.securedbydesign.com/images/downloads/HOMES\\_BROCHURE\\_2019.pdf](https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019.pdf)

**Layout of site**

Referring to site plan drawing number 18.007(2-)001 dated 08/03/18.

## **Boundary treatments**

I would recommend that all the existing walls and gates are kept and maintained where required. The southern boundary wall behind number 60 New North Road is lower than the rest of the boundary. There are currently large dumpster bins located against the wall, these can be used for climbing aids and should be moved away and secured elsewhere.

Additional trellis topping fencing can be added to the top of any boundary to enhance the security and prevent climbing access. This type of fence topping is fragile and will break when climbed. It also allows for better natural surveillance through the fencing.

Access must be restricted from each point of entry onto the site. I recommend that an access control system is installed on gates into the site as well as on all external main entrance doors to prevent unauthorised entry into the building.

Planting beneath the front main building is mentioned as a buffer zone. I would welcome the planting of hostile plants such as Berberis or Pyracanthus beneath windows on this elevation. This would reduce the climbing access to the windows from outside.

## **External lighting**

Street lighting levels should conform to BS5489-2:2016 standard should provide good colour rendition of RA60 or above. The lighting should cover the surrounding walkways and any steps on the site. It is advised that LED lighting standards are installed to produce downward lighting. This lighting should give a uniform spread of light around the site and not have any large areas of shade or shadow.

The site should provide external lighting such as low energy photoelectric cell or dusk until dawn lighting above all access doors of the building. Any fittings and wiring should be vandal resistant and located within inaccessible positions to deter any criminal attack.

The lighting plan should work in harmony with any CCTV system, which should cover the same locations as mentioned above, including the lobby areas.

## **Security measures**

As per Building Regulations (Approved Document Q), doors and windows should be to one of the following standards;

### **Door sets:**

PAS 24:2016 or  
STS 201 Issue 7:2015 or  
LPS 1175 Issue 7.2:2014 Security Rating 2+ or  
LPS 1175 Issue 8:2018 B3 Security Rating 2+  
STS 202 Issue 6:2015 Burglary Rating 2 or  
LPS 2081 Issue 1.1:2016 Security Rating B

Bespoke wooden doors should be a solid or laminated timber with a minimum density of 600kg/m<sup>3</sup> and to 44mm thickness and include a 5 lever mortice lock to standards BS 3621 with a night latch or rim lock which are tested to the same standards.

External fire doors should be PAS24 2016 rated. I would recommend that internal doors are also PAS24 2016 rated and subject to a security management programme. These door standards can be found on;

<https://www.securedbydesign.com/member-companies/accredited-product-search?view=catinfo&sbdoldcatid=70#advanced-search>

Particular attention is drawn to installing the best possible door locks on all new builds, especially the euro-profile cylinder lock types. Some of the door sets quoted above can include a minimum standard euro cylinder lock which meets BS EN 1303 standards and is 1 Star Rated and offers no resistance to crimes relating to lock snapping which is still a common method of burglary across West Yorkshire. **I would strongly recommend that any doors that include a euro cylinder lock are rated to standards; TS007 3 Star, STS 217 or Sold Secure Diamond Standards** which offer more resistance to this type of attack and will prevent crime.

#### **Windows:**

BS PAS 24-2016

STS 202 Issue 3:2011 BR 1

STS 204 Issue 3:2012

LPS1175 Issue 8:2018 B3+ (SR2) or above.

LPS 2081 Issue 1:2015 SR A

Ideally laminated glazing should be installed and certificated to BS EN 356 1A rating, so that if there are any attempts of entry the glass will remain intact. For existing glazing that is to be retained, I suggest that laminate film is applied to ground floor and accessible windows throughout the site on the inside of the glass. It is suggested that film to BS EN12600 Class 2B2 or above

#### **Car parking**

Provision should be in curtilage parking or within view of the car owner's home. Rear parking court areas that are hidden from view behind walls and fencing are unacceptable. They are known to become associated with nuisance and anti-social behaviour as well as increasing the opportunity for car crime and rear access burglary.

#### **Motorcycles Parking**

Ground anchors and/or metal support stands provide a primary point for securing motorcycles, around which other secondary measures can be added by the rider, such as disc locks, grip locks, bike covers to one of the following security standards:

- Sold Secure Gold;
- STS 501

Motorcycle parking bays can be made more secure by the installation of ground anchors, or robust metal support stands running at the side of adjacent paving. They provide a firm and immovable object to affix the rear wheel of a motorcycle. Ground anchors should be installed at the rear of motorcycle parking bays near to the kerb line and relatively flush to the road surface to prevent them being a trip hazard and meet one of the following security standards:

- Sold Secure Gold;
- STS 503

If metal support stands are provided, these should consist of galvanised steel bars (minimum thickness 3mm), with minimum foundation depths of 300mm with welded anchor bars.

#### **Cycle storage**

At this stage of the application, there is no mention as to whether cycle storage will be included or not, however, if there are to be sheds or cycle storage, further details are required on the security and fabrication. If cycle storage is to be a wooden shed, there should not be any windows installed. The door hinges, including the hasp and staple should be coach-bolted through the shed structure. Any padlocks should look to be certified to Sold Secure Silver or LPS 1654 issue 1:2013 SR1.

The bicycle security anchor should look to be certified to Sold Secure Silver Standard or LPS 1175 issue 7.2 (2014) SR1 and securely fixed to the concrete foundation.

### **Intruder alarms**

I would recommended installing an intruder alarm into each dwelling to provide additional security. Suitable standards are to BS EN 50131 or PD6662 (wired alarm system) or BS 6799 (wire free alarm system).

Alternatively if intruder alarms are not being provided by the Developer, installing a 13 amp spur point is a cost effective measure to apply and will allow residents the option of purchasing their own intruder alarms.

### **CCTV**

External warning signs should be installed all around the forecourt stating that there is "MONITORED" CCTV recordings on site.

CCTV is not a universal solution to security problems. It can help deter vandalism or burglary and assist with the identification of offenders once a crime has been committed, but unless it is monitored continuously and appropriately recorded, CCTV will be of limited value in relation to the personal security of residents and visitors. That being said, the provision and effective use of CCTV fits well within the overall framework of security management and is most effective when it forms *part* of an overall security plan.

Developers of new commercial premises and managers of existing premises that are considering the use of CCTV must be very clear about the objectives they wish to meet and establish a policy for its use and operation before it is installed. It is important to seek independent advice before approaching an installer and to develop a comprehensive operational requirement for the system, which can be supplied to installers during the tendering process. An operational requirement will be used for the design, performance specification and functionality of the CCTV system. In effect, it is a statement of problems, not solutions and will highlight the areas that must be observed by the system and the times and description of activities giving cause for concern. A useful reference to help achieve this goal is the *CCTV Operational Requirements Manual 2009 ISBN 978-1-84726-902-7 Published April 2009 by the Home Office Scientific Development Branch*

The CCTV system must have a recording capability, using a format that is acceptable to the local police. The recorded images must be of evidential quality if intended for prosecution. Normally this would require a full 'body shot' image of a suspect. It is recommended that fixed cameras are deployed at specific locations for the purpose of obtaining such identification shots. An operational requirement must take account of this fact and decisions made as to what locations around the building are suitable for obtaining this detail of image. The recording of vehicle licence plates may also be practical and useful.

Whilst the location of cameras is a site specific matter it would be normal practice to observe the main entrance to the premises and the reception area. In high crime areas CCTV cameras may need protection within a vandal resistant housing. CCTV coverage is advised of any current areas of the site that are known by the staff to be problematic for criminal offences. Early discussions with an independent expert and potential installers can resolve a number of matters including:

- monitoring and recording requirements
- activation in association with the intruder alarm
- requirements for observation and facial recognition/identification
- areas to be monitored and field of view
- activities to be monitored
- the use of recorded images
- maintenance of equipment and the management of recording
- subsequent ongoing training of operatives

CCTV systems must be installed to BS EN 50132-7: 2012+A1:2013 *CCTV surveillance systems for use in security applications*.

The design of a CCTV system should be co-ordinated with the existing or planned lighting system for the buildings and the external grounds, to ensure that the quality of the lighting is sufficient to support the CCTV.

CCTV systems may have to be registered with the Information Commissioner's Office (ICO) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available at this website: [www.ico.gov.uk](http://www.ico.gov.uk)

For guidance on the use of CCTV images as legal evidence see also BS 7958: 2009 *Closed circuit television (CCTV). Management and operation. Code of practice*. This document provides guidance and recommendations for the operation and management of CCTV within a controlled environment where data that may be offered as evidence is received, stored, reviewed or analysed. It assists owners of CCTV systems to follow best practices in gaining reliable information that may be used as evidence.

Remotely monitored detector activated CCTV systems must be installed in accordance with BS 8418: 2015 *Installation and remote monitoring of detector operated CCTV systems - Code of practice*

This report is submitted in the interests of crime prevention, and addresses our collective responsibilities under **Section 17 of the Crime and Disorder Act, 1998**.

Whilst there is no objection in principle to the application, West Yorkshire Police feel that the above recommendations would be beneficial to the security and safety of the site users. Therefore, it is advised that the points raised in this document should be implemented.

Yours sincerely  
Richard Thornton  
Designing Out Crime Officer

Telephone Police Non-Emergency – 101  
Kirklees Planning Office – 01484 221000



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