Designing Out Crime Officer
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West Yorkshire Police
Kirklees District

To: Neil Bearcroft	Ref: 2019/90988 Date: 10th April 2019

Site Location: Land adjacent to Lock 38, Marsden Lane, Marsden,, Huddersfield, HD7 6AF

Application Type: Use of land for camping provision

Dear Neil

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.

Layout of site

Referring to the artists indicative impression and the Design and Access Statement date March 2019.

Boundary treatments

Due to the site location adjacent to the canal towpath and River Colne, this site will be easily accessible on foot from various directions. In keeping with the local ecology and conservation, commercial security fencing materials including welded mesh, railings and timber type fencing may not be suitable. I would encourage the use of traditional hedgerows in the Yorkshire style for perimeter fencing. These could be made from hostile plants and shrubs such as Hawthorne or Berberis Vulgaris. This formation of hedgerow will give a

defensible barrier to the perimeter of the site and should be accompanied by a management programme to maintain it.

It is usually recommended that boundary treatments for the site are to a height of 2400mm. In this case however, a starting height for the hedgerow should be 1.5m. It is advised that the hedgerow is allowed to develop enough depth to deter someone climbing it.

Natural surveillance is important across the site for security. Vegetation growth should be managed to heights of 1m for shrubs and trees to have a canopy of 2m from ground level. This will allow maximum visibility across the site.

Access must be restricted from public land by installing a lockable gate to the same height as the perimeter fencing.

External lighting

For street lighting, levels should conform to BS5489-2:2016 standard and should provide good colour rendition of RA60 or above.

The site should provide external lighting such as low energy photoelectric cell or dusk until dawn lighting above all access doors of the buildings. Any fittings and wiring should be vandal resistant and located within inaccessible positions to deter any criminal attack. I would advise that the local authority Ecology Officer is consulted with regards to the impact any lighting on site will have with the wildlife.

Car parking

Provision should be for parking within view of the car owner's residence or plot. Parking court areas that are hidden from view behind fencing or high vegetation are unacceptable. They are known to become associated with nuisance and anti-social behaviour as well as increasing the opportunity for car crime.

Cycle Parking / 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.

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.

Signage should be used to alert riders and advise them to use the ground anchors or support stands provided along with their own security hardware. All of the above issues could also be considered at dedicated parking facilities if a motorcycle bay is installed into an existing site.

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 staff 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

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

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