



**WEST YORKSHIRE
POLICE**

**West Yorkshire Police
Kirklees District**

Designing Out Crime Officer

West Yorkshire Police
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To: Chris Carroll	Ref: 2019/92587 Date: 30 th August 2019
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Site Location: Wheelwright Centre, Birkdale Road, Dewsbury, WF13 4HG

Application Type: Conversion of building to form 65 residential units

Dear Chris

Thank you for your request for consultation for the above outline application.

Following my site visit on 29th August 2019 with Planning colleagues and having read the available plans and information, I would like to offer the following comments and information guides;

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/SBD_Commercial_2015_V2.pdf
https://www.securedbydesign.com/images/downloads/New_Schools_2014.pdf

Applicants are encouraged to apply for Secured by Design accreditation for all new dwelling developments in order to achieve a recognised award for security standards. Please see the web link below for further information;

<https://www.securedbydesign.com/services/sbd-awards>

Layout of site

Referring to the Design and Access Statement dated June 2019 and overall site plan drawing number 321/MMR – WK-00a dated April 2018.

The site is quite extensive in size with a very large perimeter. Most of this perimeter wall will be undefendable, unless large amounts of money are spent making it secure. I would like to concentrate on the areas that are of most concern to the security of the building and parking areas.

Boundary treatments

It is recommended the rear boundary to the North of the site backing on to the open space has additional treatment on top of the existing stone wall. I would suggest installing close link welded mesh or expanding metal fencing to a height of at least 1.8m. This should be installed on top of the stone wall as close to the external facing edge as possible to prevent footholds for climbing. The fencing must secure the West corner of the site and should extend beyond the stone steps on the North boundary to cut off access from the field onto the North car park of the site.

Access gates to the rear of the building

Gates to the side and rear of the building that provide access must be robustly constructed, be the same height as the fence (minimum height 1.8m) and be capable of being locked (operable by key from both sides of the gate). Such gates must be located on or as near to the front of the building line as possible to maximise natural surveillance.

Public spaces to be well overlooked and illuminated

All public open space (POS) and publicly accessible areas should be designed to allow as much supervision as possible from nearby dwellings. This means including windows in gable elevations where appropriate. Lighting provision should be able to support this.

In addition, boundaries between public and private space needs to be clearly defined, including features that prevent unauthorised vehicle access. Buffer zones should separate the rear of the building from any POS.

Trees and vegetation

In order to maximise natural surveillance on the site, all trees and hedges should be subject to a management scheme in order to maintain the heights and densities of the vegetation. Trees should have their canopy raised to 2m from the ground and low growing bushes and vegetation should be maintained to 1m in height. This would prevent hiding places for offenders.

Defensible planting can be used as boundary treatments. Hostile plants such as *Berberis Vulgaris* can be planted parallel to fencing or below ground floor windows to create defensible space. I would strongly recommend any areas around the site perimeter to have defensible planting to supplement the existing walls and fencing.

External lighting

All street lighting for both adopted highways and footpaths, private estate roads and footpaths and car parks must comply with BS5489-2:2016 standard. Where conflict with other statutory provisions occurs, such as developments within conservation areas, requirements should be discussed with the local authority lighting engineer.

Landscaping, tree planting, CCTV and lighting schemes shall not be in conflict with each other.

The recommended Overall Uniformity of light for a development is expected to achieve a rating of 0.4Uo and should never fall below 0.25Uo. *The evenness of light distribution is almost always more important than the levels of illumination being achieved by the system (the levels are determined by BS 5489) The British Standards Institute have issued an advisory note stating that they recommend that Uo be at least 0.25 or 25%. A 0.4 Uo value is the ideal standard for a lighting system, but where technical reasons prevent this we will still require the very best levels possible and under no circumstances may the rating fall below 0.25Uo.*

The Colour Rendering qualities of lamps used in an SBD development should achieve a minimum of at least 60Ra (60%) on the Colour Rendering Index

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.

Security measures

Internal partition wall construction

I am concerned about the current plan to build internal dwelling walls from timber and plasterboard only. It is advised that dividing walls between internal dwellings be to STS 202 Issue 7 BR1 standard or made from solid materials such as concrete block or brick. Any internal partition wall made up from none solid material such as plasterboard and wooden stud work should be reviewed for security purposes.

Door sets

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

- PAS 24:2016; or 11
- STS 201 Issue 7:2015; or
- LPS 1175 Issue 7.2:2014 Security Rating 2+; or
- LPS 1175 Issue 8:2018 Security Rating A3+; or
- 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/m³ 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>

All new builds / refurbishments must have the best possible door locks installed, especially the euro-profile cylinder lock types. Some of the door sets quoted above can include a minimum standard euro cylinder lock that meets TS007 standards and is 1 Star Rated. These locks offer less 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 be rated to standards; TS007 3 Star, STS 217 or Sold Secure Diamond Standards that offer more resistance to this type of attack.

Windows

Window frames must be securely fixed to the building fabric in accordance with the manufacturer's instructions and specifications. All easily accessible windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards:

- PAS 24:2016; or
- STS 204 Issue 6:2016; or
- LPS 1175 Issue 7.2:2014 Security Rating 1; or
- LPS 1175 Issue 8:2018 Security Rating 1/A1; or
- STS 202 Issue 7:2016 Burglary Rating 1; or
- LPS 2081 Issue 1.1:2016 Security Rating A.

Ideally, laminated glazing should be installed and certificated to BS EN 356 1A rating. If there are any attempts of entry the glass will remain intact.

Cycle and Motorcycle parking and storage

The current siting of the cycle bays are of concern, especially the one on the North boundary. I welcome the comments about bringing the cycle storage into the building. This will add to the overall security. PAS24 2016 doors will be required to be fitted to the entrance of the cycle store.

Installations of bicycle security anchors should look to be certified to Sold Secure Silver Standard or LPS 1175 issue 8 (2018) SR1 and securely fixed to the concrete foundation.

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 should be considered at dedicated parking facilities if a motorcycle bay is installed into an existing site.

Car parking

Parking provision should be within view of the car owner's home. Rear parking court areas that are hidden from view 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. It would be advisable to have restricted access to rear parking areas with some kind of access control system in place, such as a rise and fall barrier for example.

Coverage of the car parks with lighting and CCTV to the recommended standards is highly recommended.

Bin stores

Refuse bins must be placed behind a locked gate and must not be sited near ground floor windows, low roofs or boundary fences, as they will provide a climbing aid for offenders.

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

There is currently a CCTV system employed on the site. This should be reviewed with the below information. External warning signs must be installed all around the site stating that there is "MONITORED" CCTV recording.

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 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*

Policy Guidance

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 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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