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**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
Email: richard.thornton@westyorkshire.police.uk

To: Alice Huxley Kirklees Council Planning Services Civic Centre 1, High Street, Huddersfield, HD1 2NF	Ref: 2020/90289 and 2020/90290 Date: 17 th April 2020
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Site Location: First and Second Floors, 9 – 15 Cloth Hall Street, Huddersfield, HD1 2DX

Application Type: Alterations to convert offices to residential units

Dear Alice

Thank you for your request for consultation for the above outline application. Having read the available information, overall, West Yorkshire Police supports the principle of this application in its current form, subject to the below advice being incorporated into the design plans.

Layout of site summary and concerns

With this application having multi-occupancy. It is strongly advised that there is access control on the main ground floor entrance door. Video entry systems with mechanical or electro-mechanical lock access, is advised to secure the building from unwelcome guests.

As this building contains multiple dwellings and is served by a shared or communal entrance doorset. There may be a requirement for a doorset to be both fire and security rated. It is the responsibility of the developer or the developer's agent to ensure compliance with all applicable Building Regulations.

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.

I refer the applicant to Section 2b of the Secured by Design Homes 2019 guidance document linked below, for all of the recommended security standards for this development.

https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019.pdf

The below information is intended for the applicant to include in any amendments to the application in order to maximise the security of the development.

Security measures

Internal partition wall construction

Dividing walls between internal dwellings must 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 studwork 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

All new builds 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.

It is strongly recommended that any doors that include a euro cylinder lock be rated to standards; TS007 3 Star, STS 217 or Sold Secure Diamond Standards. These offer more resistance to this type of attack and will prevent crime. Consult the door supplier to make sure that the PAS24 rating is not affected if locks are upgraded.

https://www.securedbydesign.com/images/downloads/DOORSET_BROCHURE_update_25.3.19.pdf

Secure Mail Delivery accessed via a private dedicated entrance doorset

There are increasing crime problems associated with letter plate apertures, such as identity theft, arson, hate crime, lock manipulation and 'fishing' for personal items (which may include post, vehicle and house keys, credit cards, etc). In order to address such problems SBD strongly recommends, where possible, mail delivery via a secure external letter box meeting the requirements of the Door and Hardware Federation standard Technical Standard 009 (TS 009) or delivery 'through the wall' into a secure area of the dwelling. These should be easily accessible i.e. at a suitable height for a range of users.

CCTV

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

CCTV is not a universal solution to security problems. CCTV can help deter vandalism or burglary and assist with the identification of offenders once a crime has been committed. 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 be 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*

Intruder alarms

I would recommended installing an intruder alarm into each plot 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.

Policy Guidance

The National Planning Policy Framework (February 2019)

Section 8. Promoting healthy and safe communities

91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

b) are safe and accessible, so that *crime and disorder, and the fear of crime*, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;

Section 12. Achieving well-designed places

127. Planning policies and decisions should ensure that developments:

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where *crime and disorder, and the fear of crime*, do not undermine the quality of life or community cohesion and resilience.

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**.

Summary

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 and any re-submitted plans from the applicant to be assessed by a Designing Out Crime Officer prior to a final planning decision.

Yours sincerely
Richard Thornton
Designing Out Crime Officer

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



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To report a crime, please ring 101. Always dial **999** in an emergency.