



West Yorkshire Police
Kirklees District

Designing Out Crime Officer

West Yorkshire Police
Kirklees Council Planning Services
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To: Stuart Howden Kirklees Council Planning Services Civic Centre 1, High Street, Huddersfield, HD1 2NF	Ref: 2020/91474 Date: 11 th November 2020
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Site Location: Former scrap yard at Canalside West, Firth Street, Huddersfield, HD1 3DB
Application : Formation of 55 parking spaces

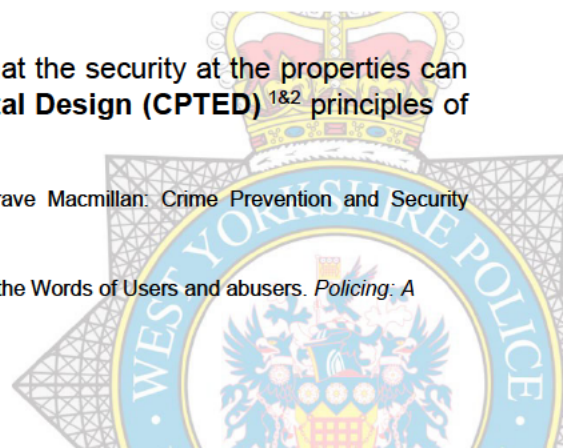
Dear Stuart

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.

Applicants are encouraged to implement the provided information so that the security at the properties can be designed in line with the **Crime Prevention Through Environmental Design (CPTED)**^{1&2} principles of Designing Out Crime.

¹ Armitage R. (2013) *Crime Prevention through Housing Design: Policy and Practice*. Palgrave Macmillan: Crime Prevention and Security Management Book Series.

² Armitage, R. and Monchuk, L. (2018) What is CPTED? Reconnecting Theory with Application in the Words of Users and abusers. *Policing: A Journal of Policy and Practice*.



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.

Boundary treatments

All steel used in manufacture should be galvanized to BS EN ISO 1461:2009 and/or stainless steel with a service life in excess of 25 years.

It is essential that all fencing and boundary treatments be designed so that the external face is flat with no footholds for climbing. This applies to any gates used on the site as well.

Gates

The design, height and construction of any gates within a perimeter fencing system should match that of the adjoining fence and not compromise the overall security of the boundary.

Access must be restricted to the perimeter defensible space from public land by installing a lockable gate of the same material and same height as the fencing. It is advised that the gate construction is such that no footholds or cross members are accessible from the outside of the gate, especially around the locking mechanism to prevent climbing.

External lighting

All street lighting for both adopted highways and footpaths, private estate roads and footpaths and car parks must comply with BS5489-1:2020 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 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 5489-1:2020) 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.

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

Security measures

Cycle Parking / Storage

Secure provision is required for any separate cycle storage in line with 'Secured by Design' guidance.

External containers specifically designed for the secure storage of 2 or 3 bicycles and certificated to, LPS 1175: Issue 8:2019 Security Rating B10 or above



SR1/2 or Sold Secure SS314 Bronze are available.

These may be suitable for the use of members of staff. The securing of cycles left unattended must be considered within the design of any new commercial premises. The cycle stand must facilitate the locking of both wheels and the crossbar.

Minimum requirements for such equipment are:

- Galvanised steel bar construction (minimum thickness 3mm) filled with concrete.
- Minimum foundation depth of 300mm with welded 'anchor bar'.

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.

Motorcycle 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.

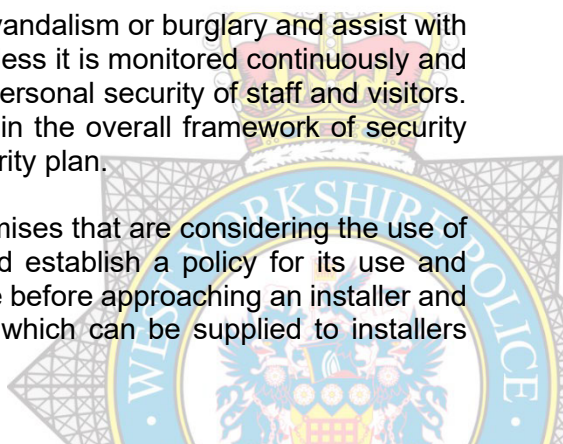
Signage should be used to alert riders and advise them to use the ground anchors or support stands provided along with their own security hardware. All of the above issues could also be considered at dedicated parking facilities if a motorcycle bay is installed into an existing site.

CCTV

External warning signs should be installed all around the site 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 62676-4:2015 Video 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.

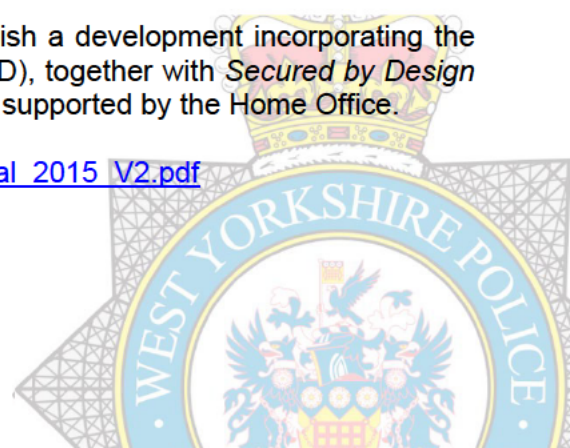
CCTV systems may have to be registered with the Information Commissioner's Office (ICO) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available at this website: www.ico.gov.uk

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*

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/SBD_Commercial_2015_V2.pdf



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

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Kirklees Planning Office – 01484 221000



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