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West Yorkshire Police
Kirklees District

To:	Nick Hirst Kirklees Council Planning Services Civic Centre 1, High Street, Huddersfield, HD1 2NF	Ref: 2020/92067 Date: 30th July 2020

Site Location: Site of former primary school at Plane Lane, Newsome, Huddersfield, HD4 6DF
Application Type: Erection of 30 dwellings

Dear Nick

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

Referring to site plan drawing number PLNST-WBA-XX-ZZ-DR-A-PL02 rev. P2 dated 22/10/2019.

The below points are of concern at present. If the agent could supply me with further information or consider chaging the plans to accommodate these points, that would be most useful and acceptable.

- Plots 16 and 17 require the removal of the shared rear access path, as this is unneccessary due to the bins being sited to the front of the properties.

- There is a gate to the boundary perimiter to the west of Plot 16. I would like further information about the structure of the gates, proposed heights and who will have access / control of keeping them locked and secure. This western perimeter makes Plots 16 to 19 more vulnerable to rear entry burglary, than the rest of the site.

- Plot 16 is shown as having a window on the lower ground floor level on the western elevation. This window services the kitchen and would be the most vulnerable to buglary due to the close proximity of the site boundary and gates mentioned above. This window design could be rotated 90 degrees to make it higher from the ground and more difficult to gain entry into the property. Alternatively, lower ground floor windows could be protected by defensible planting directly beneath them.

- It is advised that defensible planting should be installed to the west and south boundary treatments to the rear of Plots 16 to 30.

- The visitor parking bays shown near the site entrance have no direct natural surveillance from any of the new or established properties. This would increase the risk of vehicle crime to parked vehicles here, as there is a direct footpath away from the site very close to the entrance.

- Many of the plots are showing deep recesses between the blocks. It is advised that gates to the rear of the properties are brought forward to the front building line to reduce hiding places for offenders.

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.

Shared rear access footpaths

Such footpaths must not be placed at the back of properties. If they are essential to give access for residents, they must be provided with gates placed at the entrance to the footpath, as near to the front building line as possible. Gates should be lockable from both sides. Street lighting should also be designed to ensure illumination of the gate area.

Boundary treatments

It is recommended the rear boundary treatments for each plot are to a height of 1800mm such as masonary materials, close boarded timber fencing or other durable materials. Rear plot dividers in height of 1800mm consisting of the same material as above should be installed between properties.

Additional trellis topping fencing can be added to the top of any fencing 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 the front of each plot into the rear garden by installing a 1800mm high lockable gate. This gate should be positioned near to the front building line to eliminate recesses and to increase natural surveillance restricting unauthorised access.

Dwelling front boundaries

Plots with open front gardens, should have a marked boundary that clearly distinguishes the private space of the garden, from the public space outside it. This should consist of hedge / low wall / fence / railings of around 1m in height.

Open plan frontages often contribute to complaints of nuisance and anti-social behaviour. By having a robust form of boundary treatment, there will be no dispute over ownership and maintenance of particular plots. It will reduce the probability of desire lines being created across front garden areas.

The effect of having clear front boundaries would be to stop people casually wandering across the face of individual houses, a common cause of nuisance and conflict. The boundary also has the effect of defining “defensible space” adding to property security.

Rear gardens. Side boundaries dividing house plots from each other

Plot dividers need to be tall and substantial enough to provide both privacy and security. Closed boarded timber fencing should be provided to a minimum 1.5m in height, and include privacy screen (a section of higher fencing) of 1.8m in height projecting out from the building for about 2m, to provide a private amenity area adjacent to the home.

Access gates to rear gardens

Gates to the side of the dwelling that provide access to rear gardens or yards 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.

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, and POS should not immediately abut residential buildings, and should not be positioned bordering the rear of gardens. Buffer zones should separate rear gardens 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.

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.

External lighting

Street lighting along the highways and private estate roads to properties is essential. If the roads are not adopted as Highway and maintained by the Local Authority, clarification of who would be responsible for the street lighting maintainence will be required. No lighting provision along unadopted roads and private access roads would leave properties vulnerable to crime and is unacceptable.

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, 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 BS5489-1:2020*) 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.

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;
• STS 201 Issue 7:2015; or
• LPS 1175 Issue 8:2019 Security Rating A2+; 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.

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) must be certificated to one of the following standards:

• PAS 24:2016; or
• STS 204 Issue 6:2016; or
• LPS 1175 Issue 8:2019 Security Rating A2 + ; 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, so that if there are any attempts of entry the glass will remain intact.

Motorcycle and Cycle storage

Sheds or cycle storage security is important due to the value of goods often kept inside. 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 1.1 2014 SR1.

The bicycle security anchor should look to be certified to Sold Secure Silver Standard or LPS 1175 issue 8 (2019) 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.

Car parking

Provision should be in curtilage parking or within view of the car owner's home. Rear parking court areas hidden from view behind garden 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.

Bin stores

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

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 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*

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.

West Yorkshire Police encourages applicants to seek to build / refurbish a development incorporating the guidelines of **C*rime 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

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

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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