WEST YORKSHIRE POLICE

West Yorkshire Police
Kirklees District

Designing Out Crime Officer
West Yorkshire Police
Kirklees Council Planning Services
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To: William Simcock Kirklees Council Planning Services Civic Centre 1, High Street, Huddersfield, HD1 2NF	Ref: 2020/93807 Date: 2nd December 2020

Site Location: The New Huddersfield Hotel, 41 Kirkgate, Huddersfield, HD1 1QT
Application type: Change of use from part vacant hotel to form 9 residential apartments

Dear William

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.

In addition to the Secured by Design New Homes standard in the below web link, the following points are considered necessary and must be included within the 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.

1 - Lighting

Lighting should be carefully co-ordinated, so that potential areas of risk are adequately covered. A Good lighting scheme will help to deter intruders and reduce the fear of crime. It is a prerequisite that the following areas are included in the lighting scheme:-

- Main site access
- Car parking areas
- All footpaths and associated areas to main building
- Main commercial entrance door
- Other commercial access door/fire exit doors

All lighting must be switched automatically, e.g.

- Photo electric cell
- Time Switch
- Passive infra-red

Gates (vehicular)

There should be consultation with the Designing Out Crime Officer about the need for lockable gates to parking areas/garages. If gates are required then the following need to be considered:-

- Lockable facility
- Anti-lift hinges
- At least same height as surrounding fences
- Should be constructed so as to deter ingress/egress from under or over the gate
- Access control will be required where appropriate
- Sighting should be such as to avoid congestion on the adjoining highway
- Good design of gates can be used to enhance the aesthetic quality of the development

Main Communal Entrance Door

- Door sets should comply with the advice in Sections 2b and 3 in the Secured by Design New Homes 2019 document
- Access control with visual or audio verification ideally linked to each individual unit. This Capability must be extended to the wardens office and clear usage instructions must be provided
- Electronic door locking release by withdrawal or magnetic release to Secured by Design standards
- Automatic door closer
- The internal lobby access door locking release to be part of the master suited system with a door closer

Other Commercial Access Doors (excluding fire doors)

- Solid core construction 44mm thickness (same physical requirements as above)
- Hinge bolts to be fitted to all outward opening final exit doors
- The locking system to any remaining doors to be agreed with the local Designing Out Crime Officer on a site specific basis

- Louvered doors may require fine mesh screens and must have at least one mortice deadlock to be BS 3621/98.

Final Communal Fire Exit Doors

- These should comply BS 476 and must comply with fire regulations
- Doors must be devoid of any external furniture
- Escape devices used on the door must be strong enough to keep intruders out while allowing occupants of the building to escape. Escape hardware which is fitted to such doors must comply with the British and European standard
- BS EN 1125 (for panic hardware) and BS EN 179 (for emergency exit devices)
- Panic push bar or similar locking system
- A door alarm must be fitted and be linked to an alarm panel, either monitored by house manager or central monitoring system
- Appropriate signage to warn of alarmed door

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

External lighting

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

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; 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.

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 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, 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 (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.

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 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

It is recommended to install 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)** [1&2], together with ***Secured by Design* (SBD)**, a crime prevention initiative operated by the Police Service and supported by the Home Office.

The purpose of SBD is to guide and encourage those engaged in the specification, design and build industry into adopting crime prevention measures, which have been proven[3] to reduce the opportunity for crime and the fear of crime as well as creating safer, more secure and sustainable environments.

Established in 1989, *Secured by Design* is the title for a group of national police projects focusing on the design and security for new and refurbished homes, commercial premises and car parks as well as the acknowledgement of quality security products and crime prevention projects. It supports the principles of 'designing out crime' through physical security and processes.

Secured by Design works with the industry and test houses to create high-level security standards responding to trends in crime, and has given input on a number of key standards.

[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.*

[3] Armitage, R, and Monchuk, L (2011) Sustaining the Crime Reduction Impact of Secured by Design: 1999 to 2009. *Security Journal*, 24 (4), p. 320-343.

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
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Secured by Design
SBD
Official Police Security Initiative

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