



**WEST YORKSHIRE
POLICE**

**West Yorkshire Police
Kirklees District**

Designing Out Crime Officer

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To: Nick Hirst Kirklees Council Planning Services Oliver Hardiman SELF Architects	Ref: 2021/94280 Date: 3 rd January 2024
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**Site Location: Land off Lady Ann Road, Soothill, Batley WF17 0PY
Application Type: Erection of 65 dwellings**

Dear Nick / Oliver

Thank you for your request for consultation for the above outline application. Referring the applicants to my previous comments for application 2021/94280 dated 08 December 2021.

As the requested Security Measures information have not been forthcoming for this application. It is requested that a **PLANNING CONDITION for Security Measures** be applied to this application and the below advice be incorporated into the design plans.



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

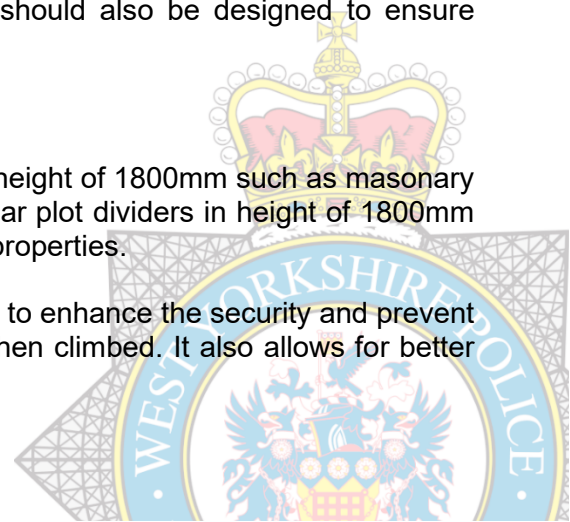
Shared rear access footpaths

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 masonry 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.

All external facing boundary treatments **MUST** be smooth faced with no footholds or cross members to enable climbing 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

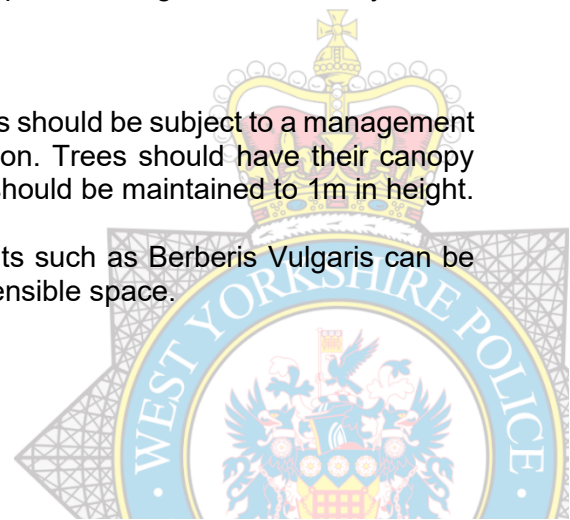
All public open space (POS) and publicly accessible areas should be designed to allow as much supervision as possible from nearby dwellings. This means including windows in gable elevations where appropriate. Lighting provision should be able to support this.

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 maintenance 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.

Bollard lighting is **NOT** acceptable for the requirements for public safety and security. Bollard lighting **DOES NOT** conform to **BS5489:2020** lighting standards as recognised and installed by the Local Authority Highways Department.

Bollard lighting is ineffective as a public safety measure due to the light spill being lower than 1m in height and the columns themselves being prone to vandalism and damage rendering them useless.

Landscaping, tree planting, CCTV and lighting schemes shall not 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

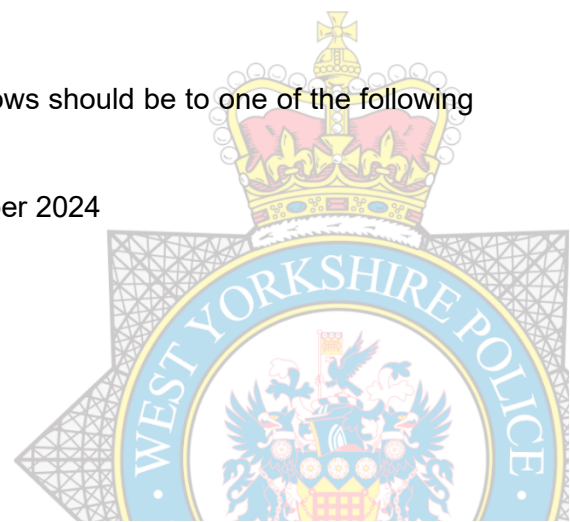
Internal partition wall construction

Dividing walls between internal dwellings must be to STS 202 Issue 9: October 2020 BR1 standard or made from solid materials such as concrete block or brick. Any internal partition wall made up from non-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.

- The new PAS 24:2022 standard; or PAS 24:2016 until September 2024
- STS 201 Issue 12:2020; or
- LPS 1175 Issue 8:2019 Security Rating A2+; or
- STS 202 Issue 10:2021 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.

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 (TS009:2019) 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:

- The new PAS 24:2022 standard; or PAS 24:2016 until September 2024
- STS 204 Issue 6:2016; or
- LPS 1175 Issue 8:2019 Security Rating A2 +; or
- STS 202 Issue 10:2021 Burglary Rating 1; or
- LPS 2081 Issue 1.1:2016 Security Rating A.

Ideally, laminated glazing should be installed and certificated to a minimum of BS EN 356 P1A rating, so that if there are any attempts of entry the glass will remain intact.

Garages: vehicular and pedestrian doorsets

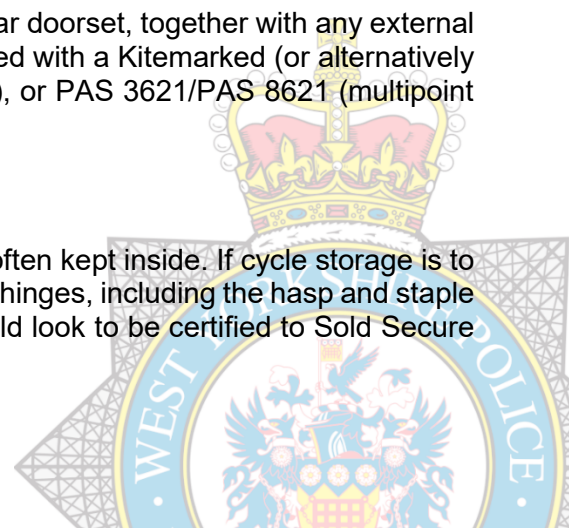
Integral garages should be of a size 7m x 3m to accommodate the average family size vehicle. Pedestrian doorsets (interconnecting or garage access doorsets) need to meet the above doorset requirements to PAS24-2016. Where a vehicular access doorset provides the primary security in this area of the building, it should be certificated to:

- LPS 1175 Issue 8.1:2020 Security Rating A1+ (or above); or
- STS 202 Issue 10:2021 Burglary Rating 1+ (or above); or
- LPS 2081 Issue 1 (2015) Security Rating A.

It is recommended that if the primary security is provided by the vehicular doorset, together with any external pedestrian doorsets, that the interconnecting doorset to the home is fitted with a Kitemarked (or alternatively certificated) lock to BS3621:2017 / BS 8621:2017 (single point locking), or PAS 3621/PAS 8621 (multipoint locking).

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 8.1 (Nov. 2020) 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.

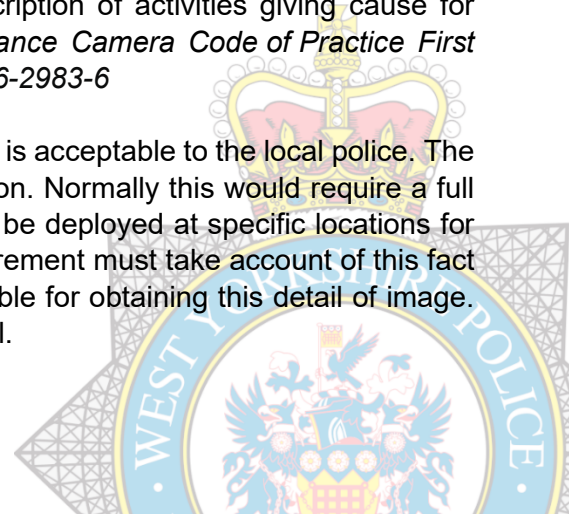
CCTV

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 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 *Surveillance Camera Code of Practice First Published June 2013 Amended November 2021. Ref: ISBN 978-1-5286-2983-6*

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 camera impact resistance rating recommendations for example in a lift or if fitted externally say an underpass or fabric of a building would be IK 8 to IK 10, whereas a camera looking from inside an office to a reception desk would be IK 1 to IK 5, leaving IK 6 & 7 for internal corridors etc. 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 several 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: 2015 *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: 2021 *Installation and remote monitoring of detector operated CCTV systems - Code of practice*

Intruder alarms

It is recommended installing an intruder alarm into each plot to provide additional security. Suitable standards are to BS EN 50131 or PD6662:2017 (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.



Security Enhancement Schemes

West Yorkshire Police encourages applicants to seek to build / refurbish a development incorporating the guidelines of **Crime Prevention Through Environmental Design (CPTED)**^{1&2}.

Enhanced security schemes such as **BREEAM / SABRE** together with **Secured by Design (SBD)**, offer developers additional security information and accreditation. The **SABRE** scheme is jointly operated by The Security Institute and the BRE Group.

Academic research by Huddersfield University has proven³ that building to enhanced security standards such as **BREEAM / SABRE** and **SBD**, reduces the opportunity for crime and the fear of crime as well as creating safer, more secure, and sustainable environments.

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.

IMPORTANT General information

This advice is based upon concerns following recent current crime trends in the area concerned. The above advice expressed, is given as a view as to what measures might reduce the risk of crime; there can be no guarantee that the recommendations / concerns will prevent crime.

Before any measures are implemented you are advised to consider current Health and Safety Legislation, Planning Permission and consult with your local **Fire Safety Officer** or any statutory body that may require notification or consultation.

Note – National standards and specifications are often updated, please ensure that the latest version of the security standards and specifications specified in this letter are adhered to.



Policy Guidance

The National Planning Policy Framework (2023)

Section 3. Plan-making

Para 20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

b) infrastructure for transport, telecommunications, **security**, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

8. Promoting healthy and safe communities

Para 96. Planning policies and decisions should aim to achieve healthy, inclusive and **safe places** and beautiful buildings 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 beautiful, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas; and

Para 100. To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

Para 101. Planning policies and decisions should promote **public safety** and take into account **wider security and defence requirements** by:

a) anticipating and addressing **possible malicious threats** and natural hazards, especially in locations where large numbers of people are expected to congregate⁴⁵. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the **Police** and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure **public safety and security**; and

b) recognising and supporting development required for operational **defence and security purposes** and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

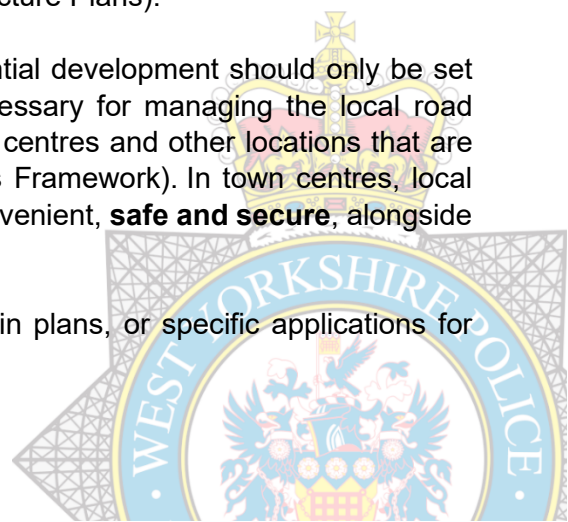
Section 9. Promoting sustainable transport

Para 110. Planning policies should:

d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as **secure cycle parking** (drawing on Local Cycling and Walking Infrastructure Plans).

Para 112. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, **safe and secure**, alongside measures to promote accessibility for pedestrians and cyclists.

Para 114. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:



b) **safe** and suitable access to the site can be achieved for all users.

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.

Para 116. Within this context, applications for development should:

c) create places that are **safe, secure** and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

Section 11. Making Effective Use of Land

Para 123. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring **safe** and healthy living conditions.

Section 12. Achieving well-designed places

Para 135. 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.

Para 141. The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Kirklees Local Plan (February 2019)

Policy LP24 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”.*

Kirklees Supplementary Planning Documents (June 2021)

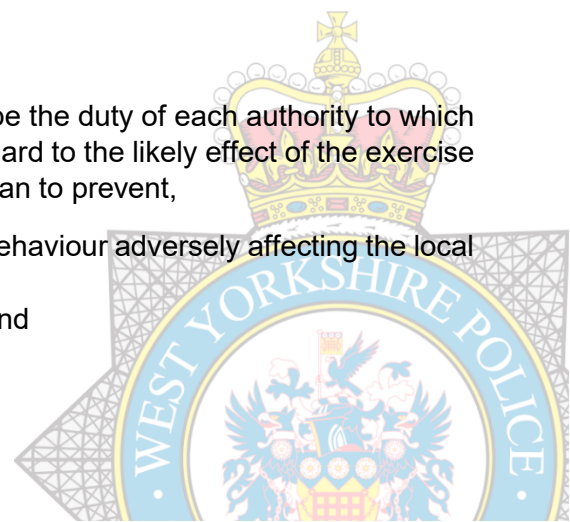
The applicants are referred to the adopted **Housebuilders Design Guide** and **Open Space Supplementary Planning Documents** (June 2021).

Crime and Disorder Act, 1998

This report is submitted in the interests of crime prevention and addresses our collective responsibilities under:

Section 17 - Duty to consider crime and disorder implications.

1. Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,
 - a) **crime and disorder** in its area (including anti-social and other behaviour adversely affecting the local environment); and
 - b) the misuse of drugs, alcohol and other substances in its area; and
 - c) re-offending in its area.



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 MSyI
Designing Out Crime Officer

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



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