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West Yorkshire Police
Kirklees District

To:	
Teresa Harlow Kirklees Council Planning Services	Ref: 2023/91198 Date: 23rd May 2023

Site Location: St John's Church, Jackroyd Lane, Newsome, Huddersfield, HD4 6QU
Application: Change of use from Place of Worship to Community Centre and Cafe

Dear Teresa

Thank you for your request for consultation for the above outline application. Having read the available information, overall, West Yorkshire Police have no objection to the principle of this application in its current form, subject to the below advice being incorporated into the design plans.

The applicants are encouraged to liaise with the local Neighbourhood Policing Team, to enable a continual relationship beneficial to the Community.

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

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 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

Roller shutters and grilles

Grilles and shutters can provide additional protection to both internal and external doors and windows. The minimum standard for such products, when required, is certificated to:

- LPS 1175: Issue 8:2019 Security Rating B10 or above
- STS 202: Issue 3, Burglary Rating 1

For roller shutters, the above minimum-security ratings are generally sufficient where:

- a shutter is required to prevent minor criminal damage and glass breakage or
- the shutter is alarmed, and the building is located within a secure development with access control and security patrols or
- the shutter or grille is intended to prevent access into a recess or
- the door or window to be protected is of a high security standard.

Security ratings higher than the minimum may be required and will be dictated by one or more of the following security considerations

- Type of crime risk
- Level of crime risk
- Location of the building
- Security level of the door or window being protected

External doorset apertures

It is important that the doorset aperture be protected. Due to the nature of some commercial building uses and locations, there is an expectation that the security will be required to meet the following minimum standards when the building is unoccupied:

- The new PAS 24:2022 standard; or PAS 24:2016 until September 2024
- LPS 1175: Issue 8:2019 Security Rating B10 or above
- STS 201 or STS 202: Issue 3, BR2

Additional security may be gained by utilising additional protection such as a certified roller shutter or grille.

It is expected that all doorset products are fit for purpose and therefore certification to the following material specific standards are also required:

- BS 6510:2010 (Steel)
- BS 7412:2007 (PVCu)
- BS 644:2012 (Timber)
- BS 8529:2010 (Composite)
- BS 4873:2009 (Aluminium)

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.

Windows

The below are the recommended standards.

- The new PAS 24:2022 standard; or PAS 24:2016 until September 2024
- STS 202 Issue 3:2011 BR 1
- STS 204 Issue 3:2012
- LPS 1175: Issue 8:2019 Security Rating B10 or above
- LPS 2081 Issue 1:2015 SR 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.

Security glazing

All ground floor and easily accessible glazing must incorporate one pane of laminated glass to a minimum thickness of 6.4mm or glass successfully tested to BS EN 356:2000 *Glass in building. Security glazing - resistance to manual attack* to category P1A unless it is protected by a roller shutter or grille. With effect from 1st January 2014 the Secured by Design requirement for all laminated glass in commercial premises will be certification to BS EN 356 2000 rating P1A unless it is protected by a roller shutter or grille.

Occasionally, when large laminated glazed panels are used on south facing elevations, there have been incidents of glazing failure (cracking) due to thermal stress. Whilst the use of toughened glass would seem to be a simple solution to the problem of thermal stress, ordinary toughened glass offers no security resistance. It is therefore recommended that the inner pane of glass used in a double-glazed unit is 'laminated toughened'. This combination of the two sheets of toughened glass and the interlayer offers both resistance to intrusion and thermal stress associated with large, glazed areas. Specifiers are reminded that the minimum requirement for SBD is BS EN 356: 2000 category P1A.

When premises are assessed as being at significant risk to the effects of blast from a terrorist attack, blast resistant glazing or anti shatter film may be required to mitigate the risk of death or injury from the effects of flying glass. Separate information from a West Yorkshire Police Counter Terrorist Security Advisor will give further information on this matter.

Car parking

Provision should be for secure parking within the site perimeter in view of the building and be covered by CCTV. Rear parking court areas that are hidden from view 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.

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 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. 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 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: 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

System designers may wish to specify component products certificated to the following standards:

Suitable standards are to BS EN 50131 or PD6662 (wired alarm system) or BS 6799 (wire free alarm system).

Security fogging devices can be incorporated within the intruder alarm system to disorientate the intruder when the alarm system is activated. They must conform to BS EN 50131-8:2009 Security Device Fog Systems.

Security Enhancement Schemes

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].

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 proven[3] 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 (July 2021)*

Section 8. Promoting healthy and safe communities

Para 8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

(b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and **safe places**, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

Para 92. 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 attractive, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas.

Para 97. 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 congregate. 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 106. 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 108. 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 110. 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 112. 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 119. 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 130. 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.

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*".

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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