Designing Out Crime Officer
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West Yorkshire Police
Kirklees District

To:	
William Simcock Kirklees Council Planning Services	Ref: 2024/91477 Date: 4th July 2024

Site Location: Former Chutney Mahal, Folly Hall, Huddersfield, HD1 3PA
Application type: 32 x Student Accommodation

Dear William

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.

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.

Main Communal Entrance Door

- For properties with 6 or more dwelling flats, it is strongly recommended that the minimum-security standard should be LPS1175: Issue 8 to B3 rating or higher. An alternative standard would be LPS2081: Issue 1.1 to B3 rating or higher. It is NOT advised to install doors to lower security standards, as these have been known to fail under attack.
- Door sets should comply with the advice in Sections 2b and 3 in the Secured by Design New Homes 2023 document.
- It is recommended that new technology is installed with facial recognition or fingerprint recognition systems. These access control systems can be added to a mobile phone via an app and can remove the requirement for keys and key fobs, both of which can be lost by student residents at a cost to the site operators.
- Access control with visual or audio verification ideally linked to each individual unit. This Capability must be extended to the warden's 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 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

Fire Safety

All the advice in this document must be taken in context with the Building Regulations, Approved Documents Part B and Part Q. Any queries must be referred to the Local Authority Building Control Department for clarification.

It is imperative that fire doorsets are tested in the same configuration as they were tested for security. You cannot add any additional or alternative features to an apartment/flat doorset without ensuring that the doorset meets the requirements for both fire and security. Some examples of areas that need careful consideration are as follows:

- Glazing – you must ensure that all fire rated glazing either meets the requirements of BS EN 356 grade P1A (min) or is supplemented by additional security glazing meeting the same standards.
- Locks – the locks must be the same for both fire and security testing.
- Letter plates – if letter plates are required, the manufacturer must demonstrate compliance with both the requirements for fire and security.

- Concealed door closers – some types of concealed door closers can substantially increase the risk of a security test failure when installed in particular types of door materials. Concealed door closers should therefore be installed within the doorset when it is security tested to ensure compliance.

Unit Front Doors

- This should comply with the requirement for front doors in the New Homes document.
- Mortice lock to BS 3621/98 and/or rim night latch.
- Multi-point locking with three or more deadlocks may be an alternative.
- A patented master suited locking system that is registered to the developer or site owner.
- Entry by key only.

Control of access into the apartment block

To assist the applicants an access control system providing the following attributes should be designed in:

- Access to the building via use of a restricted electronic key fob, card or key
- Vandal resistant external door entry system panel with an integral camera
- Remote release of the external entrance door from the individual apartment
- Audio and visual communication between the occupant in the apartment and the visitor at the
- external door
- Capture (record) images in colour of people using the door entry panel
- Battery back-up facility in case of a power failure in the system
- Fob access restricting entry to individual floor levels should also be in place (Compartmentalising the building)

Alarms

Consideration should be given to a 24-hour monitored help alarm system. This maybe controlled by a duty house manager and or an alarm-receiving centre.

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.

Internal 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 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.

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 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.

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). 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.

Cycle storage

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.

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 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: 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.

Electric Vehicle and Cycles

It is the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of the cycle storage facility, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion e-bikes have been considered and specified.

As this type of charging device is currently becoming more available and widespread in car parks and outlets, there is the likelihood that these may be targetted by criminals. There is evidence that these units have been attacked and the cabling removed by offenders at locations within West Yorkshire.

West Yorkshire has recorded crimes against this type of installation. The consequences of a person interfering with these units can be potentially fatal, therefore it is important that the applicants work with West Yorkshire Police to try to make these installations as safe as possible.

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 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 (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 congregate[45]. 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

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 and or discharge of conditions.

Yours sincerely

Richard Thornton MSyI
Designing Out Crime Officer

Telephone Police Non-Emergency – 101
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