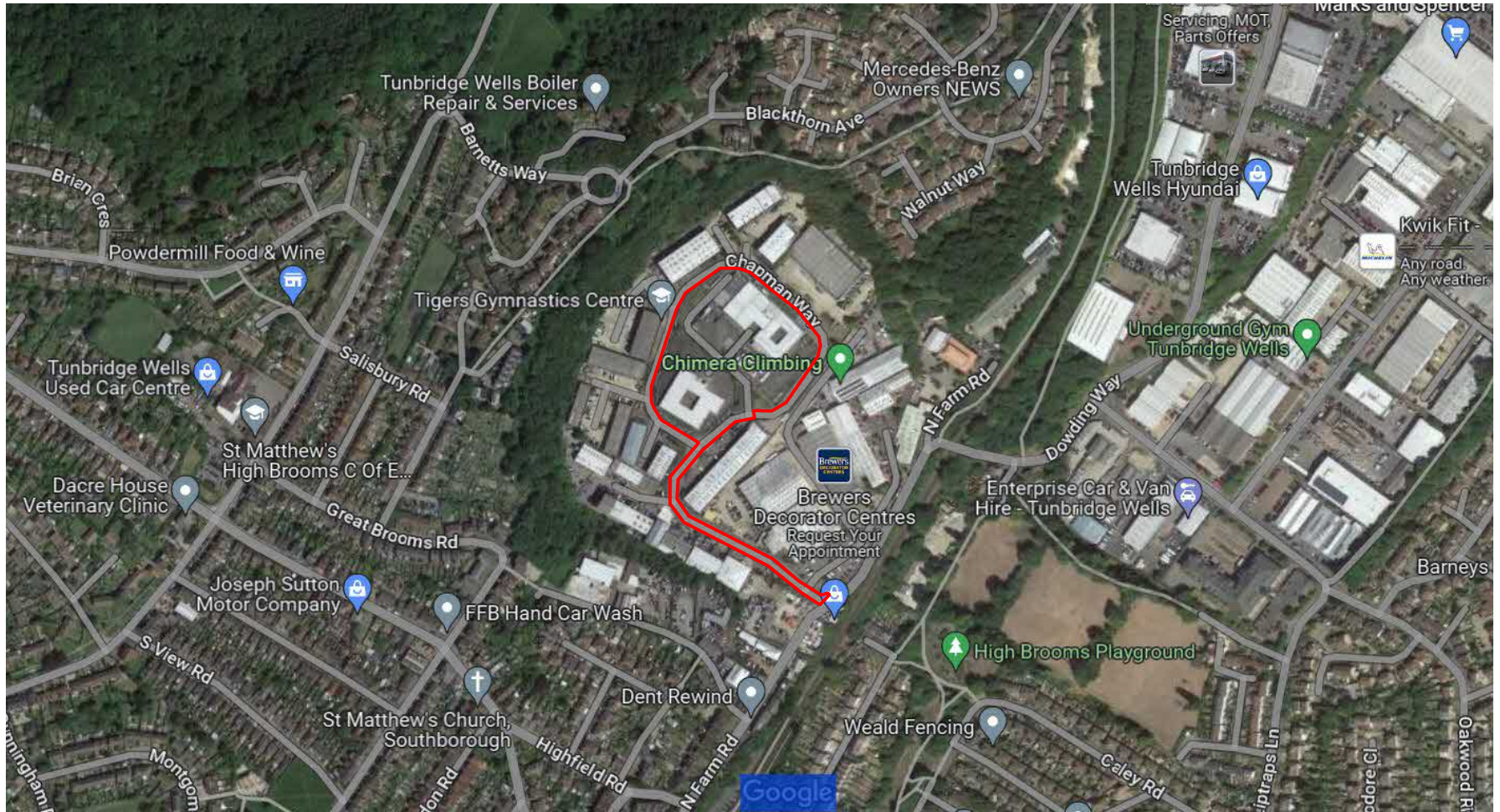


Land at Chapman Way, Royal Tunbridge Wells, Kent.



Source: Google Earth

BREEAM Security Needs Assessment
v1.0
November 2023

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1. Introduction

- 1.1. This Security Needs Assessment (SNA) has been produced by an independent crime prevention design consultant/Suitably Qualified Security Specialist (SQSS) who retired from Merseyside Police after over 26 years' service as a police officer performing a variety of roles from CID, Traffic, Firearms, to Audit and Inspection, including dialogue with criminals to understand how they identify opportunities to commit crime, and also victims of crime to monitor the short and long term effects on them. Throughout the consultant's police service, crime prevention was at the forefront, the last role being that of Force Architectural Liaison Officer (ALO) for over 7 years. The consultant has been producing Crime Impact Statements and SNAs for over 17 years.
- 1.2. As Force ALO, the consultant worked with architects, designers, developers and local authority planners to design out crime and the potential for crime in new developments of varying types and sizes by way of Crime Prevention Through Environmental Design, and also administered the Association of Chief Police Officers (ACPO) Secured by Design (SBD) initiative, providing advice and recommendations to allow the award to be made on successful completion of some schemes, be they residential or commercial.
- 1.3. The consultant also holds a professional qualification, Advanced Certificate in Environmental Design and Crime Prevention (Ad Cert ED&CP) from Oxford Brookes University and licentiate membership of the City and Guilds Institute (LCGI) and is a Home Office accredited Crime Reduction and Architectural Liaison practitioner (prior to formation of National Policing Improvement Agency) with previous experience in the built environment prior to police service. The consultant has been actively involved in many crime reduction initiatives, and was responsible for conceiving, designing and subsequently producing interactive crime reduction advice for the Merseyside Police website, which received Home Office recognition.
- 1.4. This SNA has been produced on behalf of Tavis House Stellar (Tunbridge Wells) LP to support an application for BREEAM certification for the construction of 5 no. industrial/warehouse units on vacant land at Chapman Way, Royal Tunbridge Wells, Kent. The purpose of the evidence-based assessment is to inform stakeholder decision-making and allow the identification and evaluation of security recommendations and solutions. The SNA shows how the concept of the scheme reduces its impact on and susceptibility to crime and disorder and can be used to assess the scheme for approval in this context. It will help to allay public fears about the development that could be brought about by lack of information, by providing an overview of crime levels at the site location and also in the surrounding area, and outlining the strategy which it is hoped will provide for a safe, secure and non-threatening environment both for the new user and also the existing neighbouring businesses, taking cognizance of National Planning Policy, Local Planning Policy and design guidance such as SBD.
- 1.5. The SNA will also show compliance with Tunbridge Wells planning policy in that prior to the commencement of development, input from the Kent Police Designing out Crime Officer, pursuant to the Secured by Design initiative (dated 23 January 2023), has been sought and will demonstrate, as far as practicable, how crime prevention measures will be incorporated into the new development (see Appendix A).
- 1.6. Each and every building project presents the designers with a unique set of challenges to overcome and solve. This involves seeking an acceptable compromise between the aesthetics of the architectural design and landscaping, and the need for security requirements which should be robust but subtle rather than overtly offensive and perhaps creating a 'fortress type' appearance which may increase the fear of crime.

2. Planning Policy and Design Guidance

The following policies, plans and crime prevention advice documents have been used as a source of reference in the completion of this SNA:

2.1. Ministry of Housing, Communities & Local Government–National Planning Policy Framework–Sept 2023

Section 8 – Promoting healthy and safe communities

Para 92 - Planning policies and decisions should aim to achieve healthy, inclusive, and safe places which:

- a) Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.
- 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.
- c) Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

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.
- 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.

Para 100 - Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Para 110 - In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

c) Safe and suitable access to the site can be achieved for all users.

Para 112 - Within this context, applications for development should:

d) 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 12 – Achieving well-designed places

Para 130 - Planning policies and decisions should ensure that developments:

d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit.

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.

2.2. National Planning Practice Guidance (NPPG)

With the publication of the accompanying National Planning Practice Guidance (NPPG) (Note 7.5) the government has reiterated that designing out crime and designing in community safety should be central to the planning and delivery of new development. Specifically, the Planning Practice Guidance on Design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime and disorder and do all that they reasonably can to prevent crime and disorder. Furthermore, practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation.

2.3. National Design Guide

The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice in the form of ten characteristics:

Context – enhances the surroundings.

Identity – attractive and distinctive.

Built Form – a coherent pattern of development.

Movement – accessible and easy to move around.

Nature – enhanced and optimised.

Public Spaces – safe, social and inclusive

Uses – mixed and integrated.

Homes and Buildings – functional, healthy and sustainable.
Resources – efficient and resilient.
Lifespan – made to last.

2.4. Tunbridge Wells Borough Council Local Plan 2006

The Local Plan provides local planning policies to provide for both change and conservation in the borough. The new Local Plan for Tunbridge Wells borough will provide the basis for determining the suitability of development proposals across the borough to 2038 and is currently awaiting approval from the Secretary of State.

2.5. Kent County Council – the Kent Design Guide

2.2.5 SAFE AND SECURE LAYOUTS

Deterring Crime - Layout design has a crucial role to play in preventing crime and in alleviating the fear of crime. Poor design can increase the potential for vandalism, theft, and assault.

2.6. Secured by Design (SBD)

Established in 1989, SBD was previously owned by the Association of Chief Police Officers (ACPO) and is a police initiative to guide and encourage those engaged within the specification, design and build of, amongst other things, new homes, commercial premises, schools, and car parks to adopt crime prevention measures in their new development. Following the demise of ACPO, the Mayor's Office for Policing and Crime (MOPAC) took the opportunity to provide a home to Police Crime Prevention Initiatives (PCPI) on behalf of the National Police Service. Being a police organisation, they have close working links with the National Police Chief's Council (NPCC) and Police and Crime Commissioners. The advice has been proven to reduce the opportunity for crime and the fear of crime, whilst creating safer, more secure and sustainable environments. SBD also acknowledges and licenses quality security products.

3. Environmental Visual Audit

3.1. The proposed development site, indicated approximately on the map opposite (Source: Google), is located in the High Brooms suburb of Royal Tunbridge Wells, part of the larger Borough of Tunbridge Wells, within the county of Kent. The site is approximately 2.5km north east of Royal Tunbridge Wells town centre, and 1.5km south east of the town of Southborough.

3.2. The proposed development site has good road transport links, and High Brooms railway station is nearby to the south and provides links to Hastings and London. North Farm Road, off which Chapman Way is located, is a bus route.

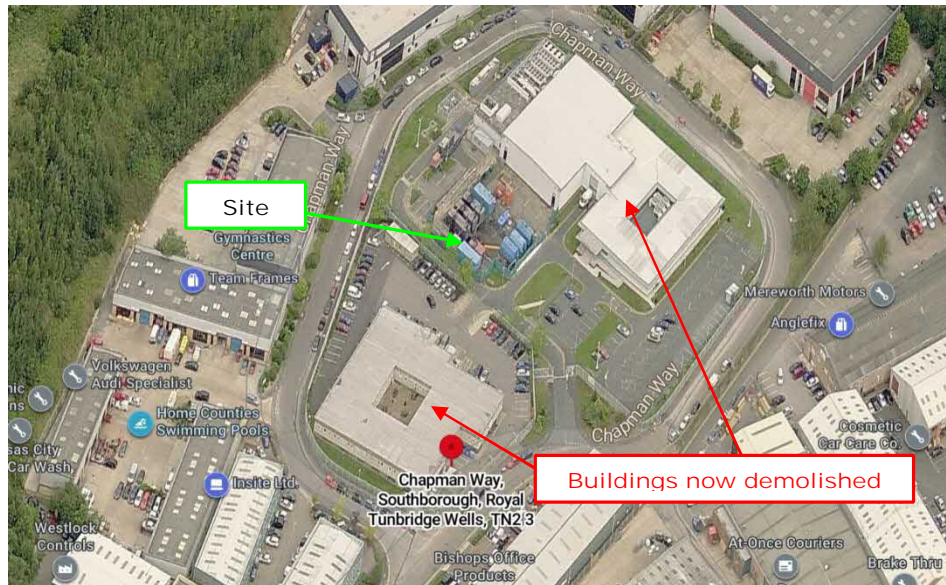
3.3. The proposed development site, part of Haslmere High Brooms Industrial Estate, was formerly home to a data centre, the buildings having been demolished and the land now cleared. The site effectively sits on an island with a circulatory road surrounding it off which other industrial/commercial units are located. Southborough Pit Site of Special Scientific Interest (SSSI) wraps around the north west, south west and western perimeter of the industrial estate. Established residential properties lie further north, south and west. On the eastern side of the railway line is another larger industrial/commercial estate.

3.4. An aerial view (Source: Google), birds eye view (Source: Bing maps) and photographs (courtesy of Glenny LLP) show other nearby landmarks and features.





Pic 1 shows an aerial view of the proposed development site.



Pic 2 shows an aerial birds eye view of the proposed development site.



Pic 3 shows a view looking north from Chapman Way towards the existing proposed development site entrance whilst demolition works were underway.



Pic 4 shows the view looking along part of the south western perimeter of the proposed development site showing the existing metal fencing which will be retained.



Pic 5 shows a view looking across the proposed development site whilst site clearance works were underway, with the existing site entrance centre right of the picture.



Pic 6 shows a further example of the existing site perimeter which is to be retained.

4. Crime Statistics and Analysis

- 4.1. Kent Police are responsible for policing an area which stretches north to Dartford and Swanley and west to Edenbridge and Tunbridge Wells. The county covers a city, and a number of towns with large areas of sprawling Kent countryside in between. The force has a number of unique responsibilities, and as well as dealing with crime and disorder, the geographic location between London and Europe means they also have a part to play in both national and international policing, being the main gateway to Europe through three major ports, the Channel Tunnel, a number of airfields and Lydd airport. The force also polices one of the most significant coastlines and busiest road networks in the country which includes the M25, M2/A2 and M20.
- 4.2. Crime covers a wide range of offences, from the most harmful such as murder and rape through to relatively minor incidents of criminal damage or petty theft.
- 4.3. Crime Categories

Anti-social behaviour - Includes personal, environmental and nuisance anti-social behaviour.

All crime - Total for all categories.

Bicycle theft - Includes the taking without consent or theft of a pedal cycle.

Burglary - Includes offences where a person enters a house or other building with the intention of stealing.

Criminal damage and arson - Includes damage to buildings and vehicles, and deliberate damage by fire.

Drugs - Includes offences related to possession, supply, and production.

Other crime - Includes forgery, perjury and other miscellaneous crime.

Other theft - Includes theft by an employee, blackmail and making off without payment.

Possession of weapons - Includes possession of a weapon, such as a firearm or knife.

Public disorder and weapons - Includes offences which cause fear, alarm, distress, or possession of a weapon such as a firearm.

Public order - Includes offences which cause fear, alarm, or distress.

Robbery - Includes offences where a person uses force or threat of force to steal.

Shoplifting - Includes theft from shops or stalls.

Theft from the person - Includes crimes that involve theft directly from the victim (including handbag, wallet, cash, mobile phones) but without the use or threat of physical force.

Vehicle crime - Includes theft from or of a vehicle or interference with a vehicle.

Violence and sexual offences - Includes offences against the person such as common assaults, Grievous Bodily Harm, and sexual offences.

- 4.4. The two sources of crime data in this document are:

Crime survey for England and Wales (CSEW) from the Office for National Statistics (ONS).

Police recorded crime.

The latest figures from the Crime Survey for England and Wales (CSEW) for the year ending June 2023 showed that total crime decreased by 10% (to an estimated 8.4 million offences) compared with the year ending June 2022, mainly caused by decreases in fraud and criminal damage offences. This follows the long-term downward trend and recent falls since the beginning of the coronavirus (COVID-19) pandemic, with total crime 18% lower than the year ending March 2020. Compared with the previous year, estimates for individual crime types showed that:

Criminal damage decreased by 28%.

Fraud decreased by 13%.

Computer misuse increased by 33%.

The CSEW is the most reliable indicator for long-term trends in the more common types of crime experienced by the general population, such as theft. However, police recorded crime data can give reliable indications of trends in some offences involving theft that are well-reported to the police (e.g., burglary) and can provide better insight into emerging short-term trends.

There were 2.6 million incidents of theft estimated by the CSEW for the year ending June 2023, no significant change compared with the previous year, but a 20% decrease compared with the pre-coronavirus (COVID-19) pandemic year ending March 2020 (3.3 million offences). This large fall was seen across most subcategories, including theft from the person (21%), "other theft of personal property" (31%), domestic burglary (32%) and vehicle-related theft (18%).

"Neighbourhood" crime, defined in the Home Office's Beating crime plan, includes robbery and selected theft offences (theft from the person, domestic burglary, and vehicle-related theft). The CSEW estimated that there were 1.5 million "neighbourhood crime" incidents in the year ending June 2023, no significant change compared with the previous year, but a 25% decrease compared with the year ending March 2020.

Although police recorded crime does not tend to be a good indicator of general trends in crime, it can give more insight into lower-volume but higher-harm offences, including those that the survey does not cover or capture well. Data for the year ending June 2023 showed:

The number of homicides decreased by 10% to 602 offences compared with the year ending June 2022 (667 offences).

Police recorded robbery offences increased by 11% to 77,337 offences compared with the year ending June 2022 (69,432 offences), however, they remained 14% lower than the year ending March 2020 (90,194 offences).

Offences involving knives or sharp instruments (excluding Devon and Cornwall Police) increased by 3% (to 50,833 offences) compared with the year ending June 2022 (49,435 offences) but remain 7% lower compared with the year ending March 2020 (54,417 offences).

Offences involving firearms (excluding Devon and Cornwall Police) increased by 13% (to 6,645 offences) compared with the year ending June 2022 (5,860 offences) and are now at a similar level to the year ending March 2020 (6,511 offences).

Police recorded crime in England and Wales in the year ending June 2023 was 4% higher than the previous year with 6.7 million crimes recorded compared with 6.5 million in the year ending June 2022. These increases were predominantly influenced by rises in shoplifting and fraud offences against businesses and other organisations, which are not included in the CSEW.

Crime survey and police recorded crime data therefore can be used together to develop a more complete picture of crime.

- 4.5. The proposed development site lies within the Southborough and High Brooms local policing area of the wider Borough of Tunbridge Wells.
- 4.6. The following maps show the overall level of reported crime within the Southborough and High Brooms policing area and nearer to the proposed development site reported in September 2023 (all data from Police.uk website). A total of 51 incidents were recorded for the entire Southborough and High Brooms policing area and it can be seen that the majority of incidents occurred around the residential area to the south of the site. Nearer to the proposed development site, in the area as defined in Fig. B, the majority of recorded incidents again occurred in and around the residential area to the south and west, and these are listed opposite the map.

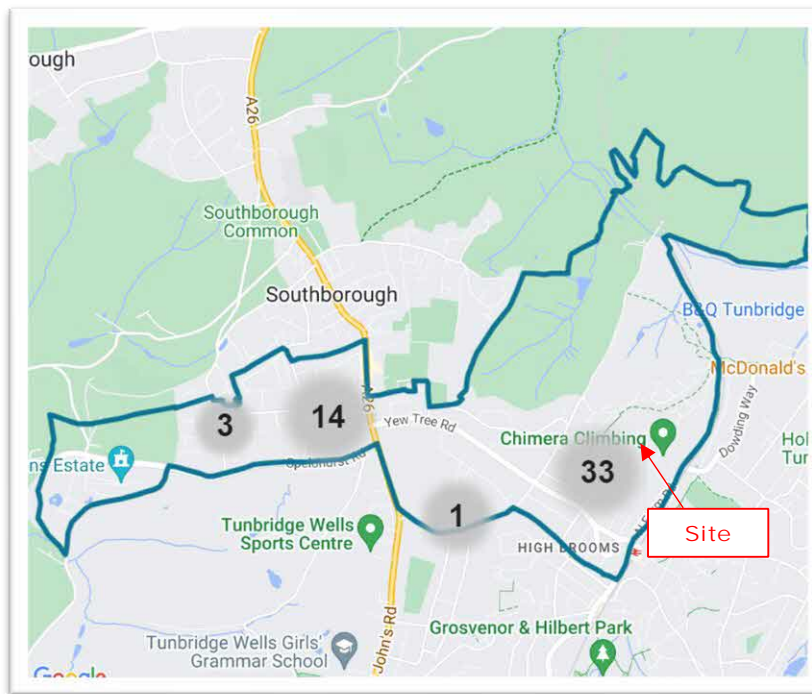


Fig. A

Recorded crimes and incidents for the Hoddlesdon local policing area

Crime types	
Anti-social behaviour	- 8
Bicycle theft	- 0
Burglary	- 1
Criminal damage and arson	- 6
Drugs	- 1
Other theft	- 4
Possession of weapons	- 0
Public Order	- 3
Robbery	- 0
Shoplifting	- 0
Theft from the person	- 0
Vehicle crime	- 4
Violence and sexual offences	- 22
Other crime	- 2

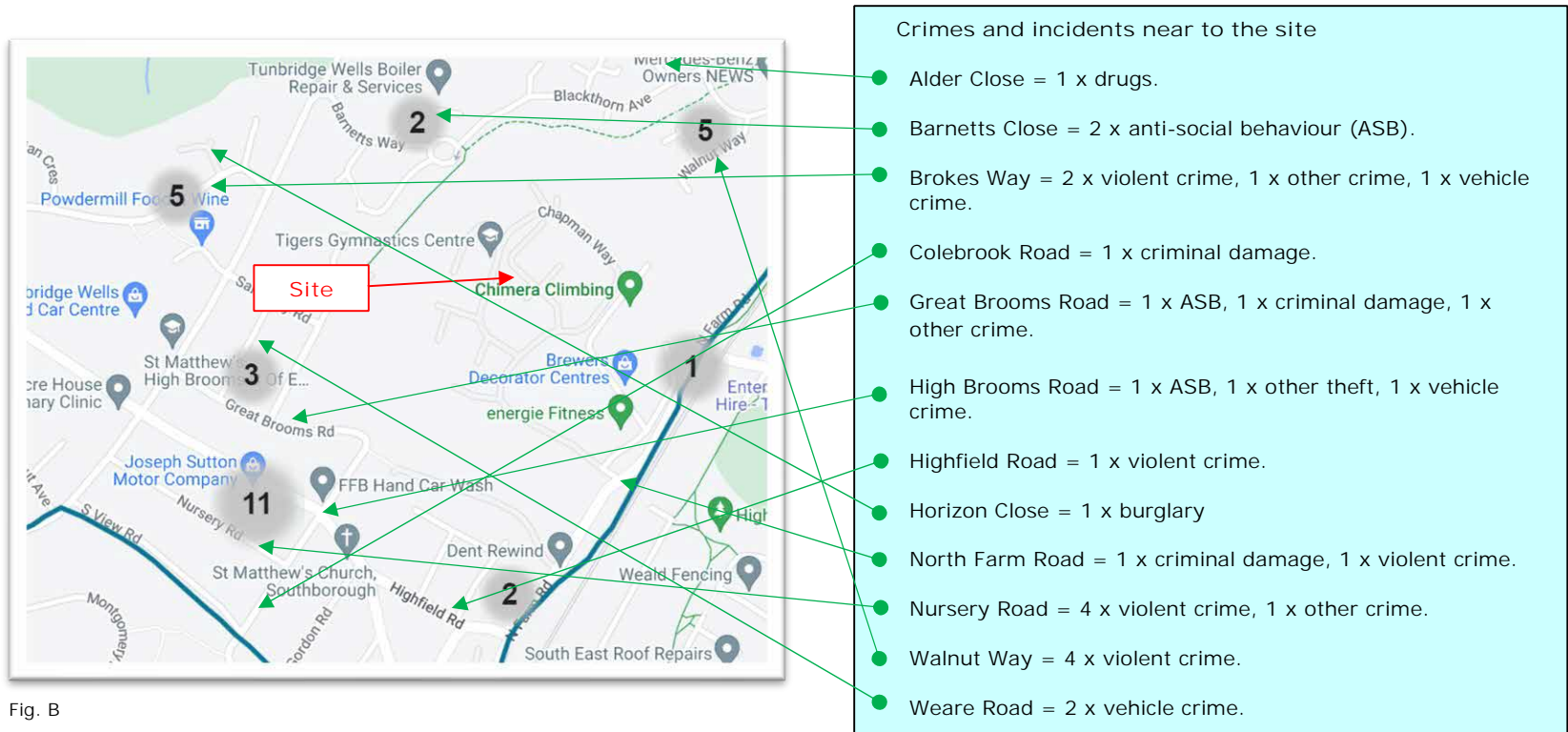
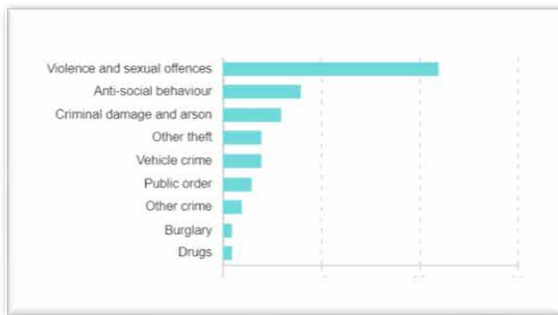


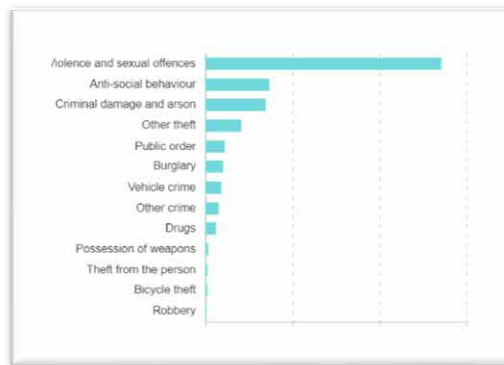
Fig. B

Crimes and incidents nearer to the proposed development site

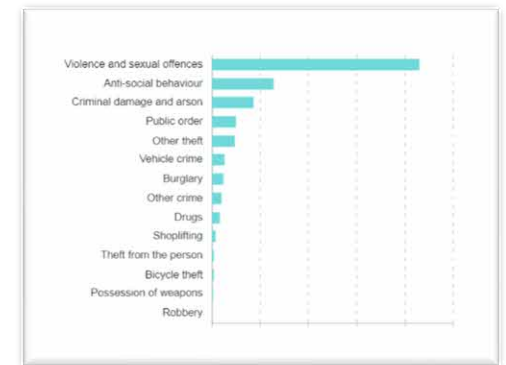
4.7. The bar charts show a comparison of the crime types and incidents committed in the Southborough and High Brooms policing area over the past 3 years. Violence and sexual offences are and have been the main issue in the area.



September 2023



Oct 2022 – Sept 2023



Nov 2020 – Sept 2023

- 4.8. Though violence and sexual offences were and still are the main issue, anti-social behaviour (ASB), as in other parts of the Kent Police area, and in fact other parts of the country, was also a significant problem in the area with 74 recorded incidents in the 12 month period October 2022 to September 2023, and 259 recorded incidents over the past 3 years. Anti-social behaviour is recorded and made up of 3 elements:

- Personal
- Nuisance
- Environmental

Personal ASB is incidents that are deliberately targeted at a particular individual or specific group or are aimed at having an impact on a particular individual or specific group rather than the community at large. It includes incidents that cause concern, stress, disquiet, or irritation through to incidents which have a serious adverse impact on someone's quality of life. At one extreme of the spectrum it includes minor annoyance; at the other end it could result in risk of harm, deterioration of health and disruption of mental or emotional well-being, resulting in an inability to carry out normal day to day activities through fear and intimidation. It would not, however, include random acts of ASB which are not clearly aimed at a specific individual: e.g., the random throwing of flour or eggs at Halloween or the throwing of snowballs providing that no harm was intended or caused.

Nuisance ASB captures those incidents where an individual or group causes trouble, annoyance, inconvenience, offence or suffering to people in the local community in general rather than being deliberately targeted at specific individuals or groups. It includes incidents where behaviour goes beyond the conventional bounds of acceptability and impacts on the quality of life of individuals and communities. Just as individuals will have differing expectations and levels of tolerance so will communities have different ideas about what goes beyond tolerable or acceptable behaviour within their communities.

Environmental ASB deals with the interface between people and places. It includes incidents and inconsiderate actions which have an impact on the surroundings including the natural, built, and social environments. This category is about encouraging reasonable behaviour whilst managing and protecting the various environments so that people can enjoy their own private spaces as well as shared or public spaces.

- 4.9. The main crime types recorded in September 2023 in the Southborough and High Brooms local policing area as defined in Fig. B earlier were violent crime (12), ASB (4), vehicle crime (4), criminal damage (3), other crime (2), other theft (2), burglary (1), and drugs (1), with no record incidents in close proximity to the proposed development site, demonstrating this to be a low crime risk area.

4.10. Between October 2020 and September 2023, on or near the roads in the vicinity of the proposed development site, crime statistics over this period reveal the following:

	ASB	Burglary	Criminal Damage	Vehicle crime	Violent crime	Robbery	Drugs	Other theft	Bicycle theft	Other crime	Public Order	Weapons	Theft from the person	Shoplifting	Totals (no. of crimes)
On or near Baldwins Lane															0
On or near Barnetts Way	0	0	3 (2)	1(1)	0	0	1	0	0	0	0	0	0	0	5
On or near Blackthorn Avenue	1	0	3(1)	0	17(1)	0	0	3(1)	0	1	2(1)	0	0	0	27
On or near Caley Road*	2	0	2(1)	1	40(11)	0	2	2	1	4(1)	0	0	0	0	54
On or near Chapman Way	7(6)	0	0	2	4(3)	0	0	1	0	1	0	1(1)	0	0	16
On or near Dowding Way*	2(1)	0	0	0	1(1)	0	0	0	0	0	0	0	0	0	3
On or near High Brooms Road	27(6)	2	15(1)	1(1)	70(10)	1	2	2(1)	1	0	7(2)	1	0	4	133
On or near Highfield Road	1	0	3	2	22(5)	0	1	2	0	1	0	0	0	0	32
On or near Longfield Road*	12(8)	3(2)	8(5)	3(1)	15(7)	0	1(1)	2(2)	0	1(1)	5(1)	0	0	22(4)	72
On or near North Farm Road	15(1)	3(2)	7(4)	2(1)	16(3)	2(2)	1(1)	5(3)	1(1)	0	2	0	1	0	55
On or near Welbeck Avenue	0	1(1)	3(2)	0	10(3)	0	0	1	0	0	1	0	0	0	16
Total (crime types)	67	9	44	12	195	3	8	18	3	8	17	2	1	26	413

*These roads fall within the adjacent Sherwood local policing area on the eastern side of the railway line.

N.B. The figures in brackets represent the number of recorded incidents that have occurred within the past 12 months.

The total number of recorded incidents is high, however, only 114 of this total occurred within the past 12 months.

The crime hotspot in the sample area is High Brooms Road to the south of the proposed development site and containing a mix of residential properties, retail outlets including convenience stores and fast food takeaways, and a public house. There is also a building which was previously 'High Brooms Working Men's Club', but this closed in 2019, which pre-dates the above crime statistics, but this could have attracted some of the criminal damage and anti-social behaviour incidents. Multiple incidents were recorded in July 2021 (13), August 2021 (12), and March 2021 (10). Violent crime, ASB, and criminal damage are and have been the main issues, matching the trend for the wider policing area.

North Farm Road, off which the proposed development site is accessed, was also a crime and disorder hotspot previously.

Highfield Road, a continuation of High Brooms Road containing established residential properties, also recorded a fairly high number of violent crimes for reasons unknown.

Blackthorn Avenue and Welbeck Avenue are established residential roads to the north and south of the proposed development site respectively, and where violent crime was previously an issue. In the past 12 months, however, relatively few incidents have been recorded.

The proposed development site location, Chapman Way, has/is suffering incidents of crime and disorder, likely attributable to the areas around two gyms shown on the earlier aerial view.

On the eastern side of the railway line, in the adjacent policing area, Longfield Road, the main thoroughfare through the industrial estate/retail park, was also previously a crime hotspot for violent crime, ASB, and shoplifting, whereas another road on the estate, Dowding Road, has suffered very few incidents.

Caley Road, an established residential road also on the eastern side of the railway line, also previously suffered from a high number of violent crime incidents, but these have reduced over the past 12 months.

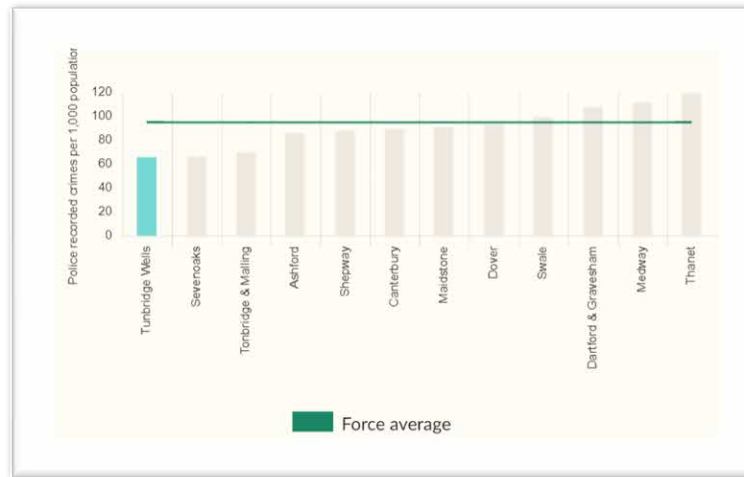
Discounting the shoplifting offences on the retail park, the main issues in the sample policing areas were as expected i.e., violent crime, ASB and criminal damage, again matching the trends for the two policing areas.

Acquisitive and property crimes around Chapman Way, i.e., burglary, vehicle crime, theft, and criminal damage, are and have been few and far between, and overall, the reduction in crime and disorder in the wider area over the past 12 months is extremely positive.

- 4.11. The following graphs show crime per month and crime per quarter in the Southborough and High Brooms local policing area. Monthly levels began the period at a 12 month high of 59 recorded incidents in October 2022, reducing over the following 3 month period, before rising again and then falling to a low of 35 recorded incidents in May 2023. Levels rose steadily from then on but showed positive signs at the end of the period. Quarterly levels began the sample period at 185 recorded incidents, falling to a low of 114 recorded incidents during the first quarter of 2022. Levels then increased again before levelling out with monthly rises and falls, averaging just under 144 recorded incidents between July 2022 and September 2023, the end of the sample period.



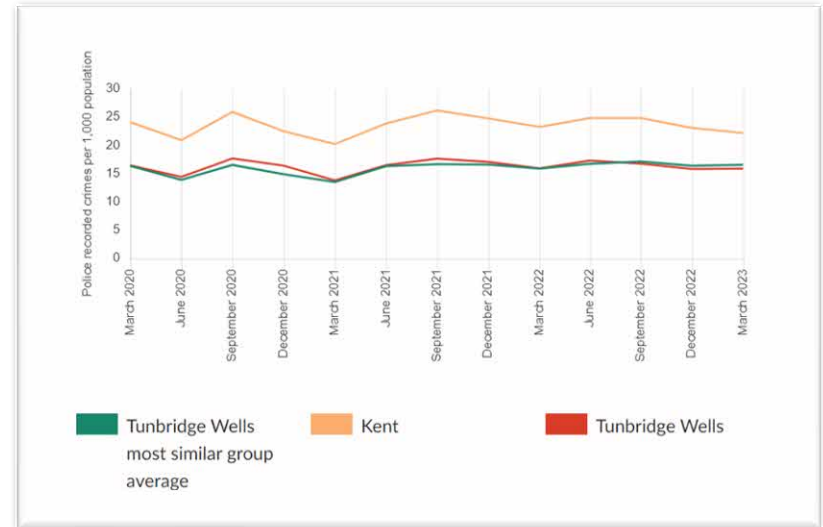
4.12. The chart below shows a comparison of the crime rate in the Tunbridge Wells Borough policing area to the average crime rate across the Kent Police area. It shows the total number of crimes over a twelve month period per thousand residents, for all types of crime in the year ending March 2023 (Source: Office for National Statistics (ONS)). Tunbridge Wells was lower than the Force average, also sitting lowest of the twelve policing areas.



4.13. The chart opposite compares the crime rate in the Tunbridge Wells policing area to the average crime rate across similar policing areas in England and Wales in the year ending March 2023. It shows the total number of crimes over a twelve month period per thousand residents, for all types of crime. Where an area lies in relation to the red and green lines is more important than its rank among similar areas. Tunbridge Wells sat between the lines; therefore, its crime rate was average for the group. The different areas shown in this chart are those that have been assessed to be most similar to Tunbridge Wells, however, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed (Source: ONS).



4.14. The chart opposite shows how crime rates in the Tunbridge Wells area and Kent Police area have changed over time. It also shows how the average crime rates in similar areas to Tunbridge Wells have changed over time. The chart shows the quarterly crimes per thousand residents, for all crime types, over a three-year period, and it should be borne in mind that some crime types are seasonal. Tunbridge Wells rates matched that of its most similar group for the entire sample period, ending slightly lower and well below the Force rate (Source: ONS).



4.15. The majority of the crime statistics within this document are from the Police.UK website, with figures provided to them from an official source i.e., Kent Police. However, not all the crimes that occurred can be shown on the map because they cannot be mapped to a specific location. The statistics adequately serve the purpose of providing an oversight and overall crime risk assessment of the area surrounding the site; however, they lack some of the detail of the Force’s own statistics due to the Data Protection Act 2018 and the General Data Protection Regulation. Other statistics have been sourced from the Office for National Statistics (ONS). Though the statistics do not document the modus operandi (M.O. - how criminals commit offences), these do in fact tend to change regularly even if the types of crime do not, so what is current in the area at the time of compiling this CIS, for example, burglaries committed by force to a rear door, or criminal damage committed by smashing windows, would not necessarily be the M.O. in the area when the development is completed. Crime patterns change regularly, so any crime prevention advice provided should always be on a ‘worst case scenario’ basis in order to cover all eventualities.

4.16. To summarise, crime and disorder around the immediate vicinity of the proposed development has been few and far between, with incidents that have occurred, likely to be away from the proposed development site itself. Incidents further away from the site match the trend for the wider policing area, however, all those with an interest in the development and local area should not become complacent because realistically, no crime is acceptable. There is no evidence to suggest that the introduction of these proposed new units will cause an increase in crime, but it is a possibility, hence the need to plan for this and introduce effective crime prevention measures into the scheme. Due to budgetary constraints, it is more important than ever that the police and local authority are assisted in their efforts to reduce crime and anti-social behaviour. The crime prevention measures intended and recommended for this proposed development will assist in this aim.

5. Proposed Site Use

- 5.1. The proposal is for more modern facilities for B2 (General industrial) and B8 (Storage or distribution) planning uses, consisting of five (5) units, associated car parking and service areas, and landscaping.
- 5.2. Vehicles and pedestrians will enter the site from the reconfigured existing entrance on Chapman Way.

6. Risk Assessment

- 6.1. Identify risks specific to the proposed, likely, or potential use of the buildings:

The typical security and safety issues for a development of this nature whilst operating and also outside of hours are:

Anti-social behaviour, violent crime, and vehicle crime incidents (based on current and past recorded incidents).
Burglary – new developments present new opportunities for criminals, however, due to low numbers of burglaries in the vicinity, and the recommended crime prevention measures it is unlikely that this will be a particular problem, but this may be dependent on end users and their types of business and operating hours.
Theft including from motor vehicles and of bicycles if site access is not controlled, with 2 incidents having occurred on Chapman Way in the past 12 months.
Criminal damage – there have been recorded incidents in the wider area, however, like burglary incidents, none have been recorded on Chapman Way.
Theft, criminal damage and ASB during the construction phases – all construction sites suffer these incidents but if the measures recommended below are implemented it should reduce the likelihood.
Blast and terrorist attack has been considered but not deemed likely, but again, this may be dependent on end users.

- 6.2. Identify risks specific to the proposed, likely, or potential user groups of the buildings:

Opportunistic crime such as sneak thefts if employees are 'tailgated' when entering any secure areas within each unit.
Theft by employees – a possibility for any business.
Theft of and from, or criminal damage to motor vehicles, property of employees committed by same.

6.3. Identify any detrimental effects the development may have on the existing community:

This proposed development will form part of an existing larger commercial/industrial development, and the wider site is already occupied by similar business uses, so it fits into the 'bigger picture' without looking out of place or attracting unlawful interest.

- Existing established businesses around the proposed development site make this an 'active' location, therefore providing plentiful surveillance opportunities and legitimate footfall, so dependent on future end users, the development may further enhance this lawful activity, thus benefiting these businesses also.
- The proposed layout and design of the development will not impact on nor have a detrimental effect on surrounding businesses and will maintain its integration within the wider area.

7. Security Strategy

7.1. Crime Prevention advice has been provided to the designers of the scheme and the clients, by utilising SBD principles in conjunction with long term practical policing knowledge and crime pattern analysis. SBD Commercial 2023 and SBD 3D interactive guidance for commercial developments has been used as a point of reference. The Kent Police Designing out Crime Officer (DOCO) has also been consulted and their response to the local planning authority is attached at Appendix A. The DOCO has also had sight of this CIS and is satisfied with the content and the recommendations below, which should be read in conjunction with those at Appendix A.

7.2. The overall aim is to achieve a suitable and sensible level of security for the entire site including building shells, and to introduce appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development in order to deter criminal and anti-social behaviour. The crime prevention measures recommended for this proposal are appropriate, realistic, and cost effective for such a scheme as per the ARC principle.

7.3. It should be noted that although there is no desire to achieve formal Secured by Design accreditation on completion of the scheme, the crime prevention measures recommended are adequate for the crime risk and comply with SBD principles.

7.4. Construction phase

Existing perimeter fencing will remain, and a monitored alarm system (by a company or individual who can provide a response) for site cabins and those structures facilitating the storage of materials and fuel is recommended.

The name of the contractor and signage with an emergency contact telephone number should be displayed at several places on the perimeter fencing which will allow the public to report suspicious circumstances.

Mobile or part time CCTV systems can be used as an effective aid to the security of a site and can act as a deterrent to criminal activity.

Control of pedestrian and vehicular access.

Maintaining a clean and tidy site to prevent any accessible debris being used by vandals.

Contractors who provide site security during the construction phase should be Security Industry Authority (SIA) Approved Contractors Scheme (ACS) compliant.

7.5. Perimeter security

The existing perimeter treatment as shown in the earlier photographs, which is a minimum of 2.1-2.4m in height is adequate for the proposed site use and appears to be in good condition.

The site existing site entrance will be reconfigured to include new vehicle and pedestrian gates, a minimum of 2.4m in height.

As the site effectively sits on an island, surrounded by a circulatory road, and overlooked by surrounding businesses, it benefits from extensive natural surveillance opportunities, with clear views through the existing perimeter treatment.

The gaps between units and the perimeter fencing, i.e., side of Units 1A, 1C, 2A and 2B, should be closed off as close to the front building lines as possible, in order to prevent unauthorised access to the rear of the units. However, and bearing in mind that these are also fire escape routes, paladin gates or similar fitted with panic push pads, and self-closing hinges should be included.

7.6. Site entrance

All vehicles including staff, service, and customer (if applicable), and pedestrians, will access the individual unit sites from one dedicated entrance on Chapman Way, via a new gated entrance.

Manual gates are proposed initially, with the capability of being converted for electric/automatic operation. The gate arrangements will largely be dictated by tenants, but the assumption is that they would be electrified for security purposes with fob type of access provided.

Consideration should be given to installing Closed Circuit Television (CCTV) and/or Automatic Number Plate Recognition (ANPR) technology to cover the site entrance, as this can be used to help detect, deter, and disrupt criminality (see 'CCTV and intruder alarm').

7.7. Waste Storage facilities

It is anticipated that each individual unit will have dedicated waste refuse and recycling storage, located externally and away from building fabrics.

The store should ideally be lockable to prevent opportunities for arson etc.

7.8. Utility services and mail delivery

It is anticipated that water, electricity, and gas meters will be located within each individual unit.

External utility access covers within the site should be secured to prevent unauthorised access and damage.

It is anticipated that mail delivery will be directly to staff in each individual unit during normal office hours.

7.9. Vehicle parking

Car parking spaces, including accessible spaces and electric vehicle (EV) charging points, will be located adjacent to each unit, well overlooked from any offices within each unit.

Cycle parking will be near to office entrances or on pedestrian access routes to each unit.

Whether within a securable structure or in the open, 'Sheffield' style steel hoops, ground anchors or similar should be provided to allow for the securing of bicycles. Kent Police recommend Sold Secure or Secured by Design approved racks, which should include two-point locking.

Although there is not believed to be any direct terrorist or other particular threat to the buildings or their users, the front building façades should be provided with an increased level of protection to prevent hostile vehicle attack, which could be achieved by way of raised kerbs or strategically placed planters as part of the wider landscaping scheme.

7.10. Building shells

The façades of the units building should minimise the opportunity for hiding and climbing onto the roofs because an unobstructed building line provides enhanced protection to the perimeter space as accessible ledges, parapets, indentations, and protrusions could provide means of assisting unlawful entry.

Rainwater goods should not allow criminals to access the roofs and should be fixed back to the building.

Any opening windows at ground level should be fitted with restrictors.

All glazing to windows and doors at ground floor level, or if otherwise accessible, should be attack resistant. Kent Police recommend laminated glass PAS 24:2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Further, any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1., with a performance rating of at least BN EN 356:2000 P1a.

All external doors, including fire exit doors, should meet the recommendations of Kent Police, i.e., PAS 24:2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. With the exception of the main office entrances and doors to loading bays etc., doors should be outward opening, flush faced steel security doors, with little or no external door furniture, which in itself is a security measure because it prevents doors being forced inwards by bodily pressure.

Fire exit doors should include internal panic push pads making them operable without the use of a key.

Any main office entrances should be access controlled, either with a physical staff presence, or electronically controlled.

Kent Police recommend that any roller shutters should be as close to the building line as possible and must avoid the creation of a recess and must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013.

Kent Police also recommend that if any of the units are to have roof access for maintenance of solar panels etc., that ladders/access doors to these areas are securely locked to prevent unauthorised access, and CCTV coverage of such areas.

7.11. Internal layout issues

Management issues will mostly dictate what happens inside each unit when in use.

Entrance cores to each unit should ideally be staffed during normal office operating hours, with the area beyond this access controlled, unless the main entrance doors include an access control feature.

7.12. Hard and soft landscaping

Shrub planting and landscaping in and around the wider site, predominantly around the perimeter, should not impede the opportunity for natural surveillance.

Tree canopies should be no lower than 2m in order to maintain views around the site.

A robust maintenance contract should also be in place in respect of trees, shrubbery, and landscaping.

Any external furniture such as benches and litterbins should be robust, fixed to the ground to prevent their use for breaking through building shells, and not located directly next to building façades.

7.13. Security lighting

Good external lighting is essential for a number of reasons, not least to prevent crime and the fear of crime.

The lighting scheme should be vandal resistant, low pollution, low energy, with a low maintenance strategy.

All lighting should meet British Standards (BS5489-1:2020 or BS EN 12464: 2021) and Lighting Guide LG6.

Lighting should cover the vehicle entrances, pedestrian entrances, and all entrances to/exits from the building, and the lighting scheme should evenly distribute the light creating no dark shadows, provide good colour rendition and support both formal and informal surveillance of the units.

The lighting scheme should be designed so as not to conflict with any installed CCTV system.

7.14. Closed Circuit Television (CCTV) and intruder alarm

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, if it is fit for purpose i.e., images are of evidential value, 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.

If a CCTV system is to be installed, to cover all units or individually, then it must be fit for purpose and installed to BS EN 50132-7: 2012+A1:2013.

An operational requirement should be used for the design, performance specification and functionality of the CCTV system, with a recording capability and format acceptable to the local police.

CCTV is only really effective if monitored 24/7, ideally on site so staff can respond instantly and liaise with the local police.

If a system is installed but is monitored off site then the local police will likely only respond when a break-in etc. has been corroborated by someone on site.

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 www.ico.gov.uk

If a system(s) is to be installed then it should cover all vehicular and pedestrian entrances and exits, the main entrance to any office buildings and any areas within the service areas deemed high risk.

Kent Police recommend the inclusion of CCTV within the development.

An intruder alarm, strongly recommended by Kent Police, should be fitted in each unit for the occasions when staff are not on site.

Any intruder alarm should be a police approved, suitably designed, and fit for purpose monitored system. For a police response, the system must comply with the requirements of the Security Systems policy, which can be found at www.securedbydesign.com.

8. Conclusion

- 8.1.** Based on the proposed and recommended security measures, this development would be consistent with current principles of the National Planning Policy Framework and will have adopted the principles of Secured by Design and Crime Prevention through Environmental Design.
- 8.2.** Analysis of crime and ASB around the immediate vicinity of the proposed development site in the 12 month period to September 2023 revealed very low levels, with the majority of incidents probably having occurred around the two gyms on Chapman Way. Without wishing to increase the fear of crime, guarantees cannot be given that the proposed development will not suffer incidents of crime and anti-social behaviour, however, all reasonable efforts to mitigate and discourage this will have been taken in the design, layout and proposed landscaping, thus minimising the vulnerability of the development to crime and disorder.
- 8.3.** The crime prevention measures agreed and recommended for inclusion in this sustainable development are appropriate and adequate for the perceived crime risk and should also satisfy the requirements of BREEAM and allow the award of the credits claimed under Hea 06. They should also satisfy and show compliance with Tunbridge Wells planning policy.



Produced by: Mr. A.P. Martin **Ad Cert ED+CP LCGI**
Crime Prevention Design Consultant/SQSS




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Paul Martin does not accept any liability in negligence or otherwise for any loss or damage suffered by any party resulting from reliance on this document.

Appendix A

Copy of Kent Police letter to Tunbridge Wells Planning Services.



Kent Police
Protecting and serving the people of Kent

Tunbridge Wells Borough Council
Planning Services
Town Hall
Royal Tunbridge Wells
Kent
TN1 1RS

E-mail: Alistair.Hendry@kent.police.uk
Date: 14th November 2023
Ref: AH.1/Pre-App/TW-238

Location: Former Spectrum & Millennium House, Chapman Way, Tunbridge Wells, Kent
Proposal: 5 x New Industrial/ Warehouse Buildings

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend the applicant follows SBD guidance to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme;

1. We recommend boundary treatments be a minimum of 2m and the installation of lockable gates to the sides of the unit to provide controlled access to the rear. These gates must be flush to the building line to optimize surveillance.
2. CCTV to be installed, especially in areas with limited natural surveillance such as rear of the units, utility areas/ bin stores and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; any stairs, emergency access doors, lifts, loading/ unloading areas, car park and reception, main office/ safe. The CCTV must not infringe any lighting plan.
3. Defined pedestrian routes to/from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.
4. Cycle storage must be well lit and with natural surveillance. We recommend the sold secure or SBD recommended products for additional security.
5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g., a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. We recommend that a suitable lighting policy is installed to ensure that the units and staff have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.
6. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24:2022 UKAS certified standard, STS 201 or

Kent Police Headquarters, Sutton Road, Maidstone, Kent, ME15 9BZ
Telephone: 101 Website: www.kent.police.uk

This is available in large print on request

LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.

8. Windows on the ground floor to meet PAS 24:2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.
9. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013
10. Bin Stores must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the building that it can be used as a climbing aid into the building when closed. Please note where there is a mixed-use building, residential and commercial bins must be segregated.
11. If any buildings are to have roof access for maintenance of solar panels and lift shafts etc., we recommend that ladders/access doors to these areas are securely locked so that members of the public are unable to access this area. We also require CCTV to cover this area in order to monitor unauthorized access

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Yours sincerely,

DOCO.

Designing Out Crime Officer
Public Protection and Partnerships Command
PVP Central Coordination Department