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Communities and Partnerships
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28th December 2022

Planner in charge Mr Robert Lankshear.
Vale of Galmorgan Planning Department
Vale of Glamorgan Council,
Barry.

Dear Mr Lankshear,

RE: LECKWITH QUAYS, CARDIFF APPLICATION NUMBER: 2020/01218/HYB

South Wales Police have considered the above application and do not object, but would ask that the following recommendations are taken into consideration. We would welcome working with the contractor in order to achieve **Secured by Design** accreditation.

The crime figures for the surrounding area have been examined and there is no crime recorded in the last 6 months from June 2022 - November 2022 this area of Cardiff has just a handful of residential properties in the vicinity and a few industrial units.

Overview:

Leckwith Road is a main route into Cardiff from the Vale of Glamorgan. There is a retail unit to the East and Cardiff City Football ground. The surrounding area is mostly industrial.

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On match days spectators park their cars along Leckwith hill and in the surrounding areas.

The documents that accompany this application have been accessed to write this report. Particular reference has been made to:

Document :	Page number:
Environmental statement Dec 2022 addendum.	Page 27
Design and access statement 27/10/20	
Leckwith Quay proposed masterplan	1844/5.102H
Leckwith Quay proposed masterplan	1844/-5.105B

The detailed plans of the units does not form part of this application such as height of fencing and boundary treatments and placement of windows, this would need to also be considered in order to ensure that advise is sought to prevent crime occuring.

The following comments and the recommendations in respect of these comments is as follows:

1. Footpaths:

There are several pathways that run through the development. Footpaths should be well lit, wide and straight. It is important that the security of the development is not compromised by excessive permeability, for instance by allowing the criminal legitimate access to the rear or side boundaries of dwellings, or by providing too many or unnecessary segregated footpaths. Private and public areas need to be identified with defensible space.

If the footpaths are intended for joint use as a footpath/ cycle way, consideration should also be given to prevent motorbikes/electric scooters being able to be driven at speed along them by installing traffic calming measures.

Recommendations:

Where it is desirable to limit access/use to residents and their legitimate visitors, features such as rumble strips, change of road surface (by colour or texture), pillars, brick piers or narrowing of the carriageway may be used. This helps to define the defensible space, psychologically giving the impression that the area beyond is private.

Footpaths should be overlooked from habitable rooms in dwellings to provide passive surveillance.

Gable ends of dwellings that abut footpaths, should have windows.

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Design in traffic calming measures if the pathway is also to be used as a cycle way.

Lighting should be to BS 5489 standards.

Reason: To provide passive surveillance, prevent injury, prevent theft/burglary and enhance public confidence.

2. Perimeter security:

The proposed site is to be built along the river Taff with the Leckwith woods being retained for a large portion of the site. The land that borders the woodlands could be vulnerable to crime and the perimeter security to the rear of the properties should be at least 2.0m high to prevent access into the rear of the properties. The site is very permeable and there needs to be clear definition as to what is private and public space. Where houses border a pathway there should be defensible space to distinguish private space, grass does not provide this. Front gardens should also be defined with a low wall, railings or shrubs.

Recommendations:

Dwelling frontages must be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.

Where rear perimeter fencing backs onto open land then the height of the fencing should be at least 2.0 m high.

Pedestrian gates should be of a framed design and employ galvanised adjustable hinges and fixings mounted behind the attack face. On outward opening gates, where the hinges/brace is mounted on the attack face, fixings should be of a galvanised coach bolt design. Hinge systems must not allow the gate to be 'lifted off' and therefore should employ a method to restrict the removal of the gate from the fence post or wall. Gates must be capable of being locked (operable by key from both sides of the gate). The gate construction should have the same design and construction attributes as the fence.

Planting should be of a low growing variety and should have a maximum growth height of 1 m.

Reason: To prevent burglary.

3. Dwelling orientation:

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Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.

It is preferable that footpaths are not placed to the back of properties. If they are essential to give access to the rear of properties, they must be gated. The gates must be placed at the entrance to the footpath, as near to the front building line as possible, so that attempts to climb them will be in full view of the street. Where possible the street lighting scheme should be designed to ensure that the gates are well illuminated. Gates must be capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb or remove from their hinges and serve the minimum number of homes, usually four or less.

Recommendations:

Parking spaces should be overlooked from habitable rooms.
Recessed areas should be illuminated and gated at the building line.

Reason: To prevent burglarly/ vehicle crime.

4. Parking:

As previously mentioned, when Cardiff City play home games at their stadium cars are usually parked in and around this area. There will need to be clear signage/ rumble strip at the entrance to the development indicating that this is a private development.

Page 27 of the Environmental statement Dec 2022 suggests that there will be undercroft car parking in order to reduce 'on street parking'. Research suggests that this type (undercroft) of parking can create ideal hiding places where crime can be committed.

Recommendations:

Secured by Design recommends that parking is incurtilage.
Garages or on a hard standing within the dwelling boundary.
Communal parking must be overlooked from habitable rooms.
Do not build in undercroft parking
Where rear parking courtyards/under crofts re considered necessary, they must be protected by a gate.
If under crofts are to be built, they should be well lit/ walls painted in light colours.
Communal parking facilities must be lit to the relevant levels as recommended by BS 5489.

Reason: To prevent vehicle crime/ antisocial behaviour.

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5. Planting:

It appears that a large portion of woodland and plants will be retained. A management plan should be in place to ensure that planting is managed to ensure

Recommendations:

Planting should not impede the opportunity for natural surveillance and wayfinding and must avoid the creation of potential hiding places. As a general recommendation, where good visibility is needed, shrubs should be selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, epicormic growth or lower branches below 2 metres, thereby allowing a 1 metre clear field of vision. Trees on appropriate root stock can provide a more reliable means of reducing the likelihood of impeding natural surveillance.

Reason: To ensure good visibility.

6. Lighting:

The lighting plan included in this application does not indicate where the lighting in and around the parking provision is situated. Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided.

Recommendations:

Install lighting to BS 5489:2020

Use of the most environmentally friendly light sources the Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons.

Lighting is required to each dwelling elevation that contains a door set.

Reason: To prevent theft

7. Communal areas:

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There are several communal areas indicated such as the ecology pond. These communal areas should be overlooked from habitable rooms.

Recommendations:

Ensure communal areas are overlooked.
Any furniture should be designed and arranged to prevent antisocial behaviour taking place.

Reason: To prevent antisocial behaviour.

8. Doors/ Windows:

Install doors and windows to the following standard:

All door sets allowing direct access into to the home, e.g. front and rear doors, interconnecting garage door sets, French doors, bi-fold or sliding patio door sets, dedicated private flat or apartment entrance door sets, easily accessible balcony door sets (Note 21.3a), etc., shall be certificated to one of the following standards: • **PAS 24:2022** (Note 21.3b); or • STS 201 Issue 7:2015 (Note 21.3c); or • LPS 1175 Issue 7.2:2014 Security Rating 2+ (Note 21.3d); or • LPS 1175 Issue 8:2018 Security Rating A3+; or • STS 202 Issue 6:2015 Burglary Rating 2 (Note 21.3d); or • LPS 2081 Issue 1.1:2016 Security Rating B.

All easily accessible (Note 22.2a) windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards: • **PAS 24:2022** (Note 22.2b); or • STS 204 Issue 6:2016 (Note 22.2c); or • LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 22.2d); or • LPS 1175 Issue 8:2018 Security Rating 1/A1; or • STS 202 Issue 7:2016 Burglary Rating 1; • LPS 2081 Issue 1.1:2016 Security Rating A

Please note the standard for PAS 24 doors and Windows has been amended.

Reason: To prevent theft/burglary.

9. Access Control:

The plans suggest that there are there are numerous blocks of flats with up to 50 units.

Recommendations:

Smaller developments containing up to and including 25 flats, apartments, bedsits, or bedrooms shall have a visitor door entry system and access



control system. The technology by which the visitor door entry system operates is a matter of consumer choice, however it should provide the following attributes: • Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key, etc.); • Vandal resistant external door entry panel with a linked camera; • Ability to release the primary entrance door set from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation); • Live audio and visual communication between the occupant and the visitor; • Ability to recover from power failure instantaneously. • Unrestricted egress from the building in the event of an emergency or power failure; • Control equipment to be in a secure area within the premises covered by the CCTV system and contained in a lockable steel cabinet to LPS 1175 Security Rating 1 or STS 202 Burglary Rating 1.

Larger developments containing more than 25 flats, apartments, bed sits, or bedrooms shall have a visitor door entry system and access control system. The technology by which the access control system operates is outlined within UL 293, however it must provide the following attributes: • Access to the building via the use of a security encrypted electronic key (e.g. fob, card, mobile device, key etc.); • Vandal resistant external door entry panel with a linked camera; • Ability to release the primary entrance door set from the dwelling or bedroom (in the case of student accommodation or House in Multiple Occupation); • Live audio/visual communication between the occupant and the visitor; • Ability to recover from power failure instantaneously, Unrestricted egress from the building in the event of an emergency or power failure; • Capture (record) images in colour of people using the door entry panel and store for those for at least 30 days. If the visitor door entry system is not capable of capturing images, then it should be linked to a CCTV system, or a dedicated CCTV camera should be installed for this purpose. This information should be made available to police within 3 days upon request; • All visitor and resident activity on the visitor door entry system should be recorded and stored for at least 30 days. This information should be made available to police within 3 days upon request. • Systems must comply with General Data Protection Regulations (GDPR).

Tradesperson release mechanisms are not permitted as they have been proven to be the cause of anti-social behaviour and unlawful access to communal developments.

10. Post delivery:

Secured by do not recommend trade buttons for blocks of appartments. If access into individual blocks is required to deliver post then the postal service should be given access by such means as a fob.

Recommendations:

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Where a surface mounted letter box is to be used it must be robust in construction. TS 009 letter boxes offer reassurance that all the above attributes have been met. In high crime areas TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter plate apertures. The letter box must be securely fixed to the face of the building in accordance with the manufacturers specifications and be in a position that benefits from natural surveillance.

Reason: To prevent unlawful access to buildings/ prevent postal theft.

11. CCTV:

A monitored CCTV system is required to adequately cover areas such as building shell, vehicle parking, and main entrance, the communal open space area and emergency exits. There should be a scheme of work for CCTV system to ensure it meets all operational requirements. The scheme should produce evidential quality imagery and store images for at least 31 days. The CCTV system should be signed and registered with the information commissioner.

Reason: to deter an offender, enhance security and provide evidence.

12. Bicycle Storage:

Bicycle stores should be situated close to the building and in view of habitable rooms and capable of being locked. The bike store behind the apartments is next to a side entrance to the rear of the property which is 900 mm high fence. The bike stores in the car park are open it is unclear if these are for general use by customer visiting the commercial unit of residents. There are high instances of bicycle crime in Cardiff at this moment in time and if the bicycle units are secure this will make the bicycle vulnerable to being stolen.

Secure by design New Homes (2019) recommends that external containers specifically designed for the secure storage of bicycles and other property must be certificated to one of the following minimum-security standards:

- LPS 1175 Issue 7.2:2014 Security Rating 1 (or above)
- LPS 1175 Issue 8:2018 Security Rating 1/A1 (or above)
- STS 202 Issue 7:2016 Burglary Rating 1 (or above)
- LPS 2081 Issue 1.1:2016 Security Rating A
- Sold Secure (Bronze, Silver, or Gold)

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56.3 Secured by Design ‘New Homes’ (2019) Also states that:

External, open communal bicycle stores with individual stands or multiple storage racks for securing bicycles will be as close to the building as possible, but in any event within 50 metres of the primary entrance to a block of flats and located in view of active rooms (Note 56.3) of dwellings. The store must be lit at night using vandal resistant, light fittings and energy efficient LED lights.

Recommendation:

Communal bicycle stores must be lockable and secure with individual stands or multiple storage racks for securing bicycles. The store must be lit at night using vandal resistant, light fittings and energy efficient Galvanised steel bar construction (minimum thickness 3M), filled with concrete; Minimum foundation depth of 300 mm with welded ‘anchor bar’. It would also be benefit from CCTV coverage.

Reason: Prevent theft

13. Bin storage:

The bin Storage should be secure and lockable – preferably with a combination lock.

Reason: To prevent littering and arson.

14. Management plan:

A management plan should be in place before habitation. This plan should consider the needs of those living in the development and should include the allocation of parking spaces. This should be in place before occupation ideally.



Careful consideration needs to be given and a risk assessment undertaken of all using the facility before they are allocated accommodation. A detailed management plan should be in place to deal with issues such as tenancy problems, faults with the entrance systems/ loss of keys/fobs can be reported and quickly replaced/ to include the vehicle entrance gate to the property being locked during the hours of darkness

Ensure that adequate risk assessments are in place in respect of fire prevention, detection, and evacuation to save life.

Policy Support.

The Crime & Disorder Act 1998 created a statutory partnership between local authorities, the police, and other key partners to work together in reducing crime and disorder in all aspects of their work.

Section 17 of the Act states:

“It is the duty of the authority to exercise its various functions with due regard to the likely effect on crime and disorder in its area and the need to do all that it reasonably can to prevent crime and disorder.”

TAN 12 Design. Para 5.17.1 “Local authorities are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998. Consideration should be given to practical ways in which the design of development can reduce opportunities for crime, disorder, and anti-social behaviour.”

- Planning Policy Wales
- 4.10.12 Local Authorities under Legal Obligation to consider the need to prevent and reduce crime and disorder.....
- 8.2.1. – Transport – Provision of safe, convenient, and well signed routes
- 9.1.1. –Housing – Objective to provide homes that are in good condition, in safe neighbourhoods and sustainable communities
- 9.1.2. Housing – Greater emphasis on quality, good design, and the creation of places to live that are safe and attractive

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Yours Sincerely

Julie Odgers
Designing out Crime Officer

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Jeremy Vaughan
Prif Gwnstabl | Chief Constable

Heddlu De Cymru
South Wales Police

