



**Kent
Police**

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Date: 23rd June 2022

Ref: 22/501335/FULL /CA.1/MA-537

Dear Austin Mackie,

Thank you for the opportunity to comment regarding:

Application Ref: 22/501335/FULL
Location: Land North Of Little Cheveney Farm Sheephurst Lane Marden Kent
Proposal: Installation of a renewable energy led generating station comprising of ground-mounted solar arrays, associated electricity generation infrastructure and other ancillary equipment comprising of storage containers, access tracks, fencing, gates and CCTV together with the creation of woodland and biodiversity enhancements.

We have considered this application regarding Crime Prevention Through Environmental Design (CPTED) in accordance with the National Planning Policy Framework (NPPF). Design and Access Statements (DAS) should demonstrate the design helps create an accessible and safe environment while minimising crime and disorder and fear of crime. Secured by Design (SBD) is the official UK Police flagship initiative combining the principles of designing out crime with physical security, found at www.securedbydesign.com.

Applicants/agents should consult a local Designing Out Crime Officer or qualified specialist to help design out opportunity for crime, fear of crime, Anti-Social Behavior (ASB), nuisance and conflict. In addition, we strongly recommend that the applicant bases the design on the SBD guides for specifications for doorsets, windows, lighting, perimeter security and other suitable specifications. We recommend the applicant attains an SBD certification, which is free of cost, to show commitment to crime prevention and community safety.

The applicant/agent should demonstrate the seven attributes of CPTED when applicable. CPTED addresses: **Access and Movement:** Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security; **Structure:** Places that are structured so that different uses do not cause conflict; **Surveillance:** Places where all publicly accessible spaces are overlooked; **Ownership:** Places that promote a sense of ownership, respect, territorial responsibility and community; **Physical Security:** Places that include necessary, well-designed security features; **Activity:** Places where the level of human activity is appropriate to the location and creates a sense of security at all times and **Management and Maintenance:** Places that are designed with management and maintenance in mind, to discourage crime in the present and future.

The applicant/agent should address crime prevention and demonstrate the seven attributes of CPTED and SBD principles. Therefore, we would like to request a crime prevention statement to be submitted as part of this application to address our comments and to provide further information in relation to physical security and security measures.

Having reviewed the application online, we would like to make the following comments:

1. The site should be fully enclosed within a minimum 2m security fencing system (or higher). We note the Perimeter Fence Details document states 2.4m, which is highly encouraged. It is, however, important that the gap between the base of any fencing and the ground is minimal, so that any equipment, such as the PV panels themselves or copper cable, cannot be easily passed underneath by thieves.
Additional defensive planting of natural hedging (thorny hedging) should be also considered around the boundary, especially adjacent to the permissive footpath proposed, as an added layer of security. Digging deep ditches to control and deter unwanted vehicle access should be considered.
2. A single gated entrance and exit, removing all private access points that are not in use is recommended if possible, and an entry control system infrared, intercom or keypad should be installed.
3. We note the Full Access Gate Elevation Plan. Secured by Design has a list of accredited products, which includes appropriate security standards for fences and gates, that have been tested and certified by a third party. This currently surpasses ADQ requirements.
4. Hinge pins for equipment cabinets, associated buildings and gates should be hidden when closed and/or fitted with anti-lift devices.
5. All photovoltaic (PV) solar panels should be individually security marked and all serial numbers recorded within a site inventory. We recommend that the PV's are installed using one way security clutch head security bolts/screws or similar, as an added layer of security and in order to make removal more difficult for thieves.
6. Copper cable, transformers, inverters, switch gear and any other equipment of high value should be security marked. This can be achieved by using unique identifiers, such as serial numbers on the insulation sheathing and / or with the use of forensic marking solutions. A full equipment inventory should be kept.
7. Appropriate crime prevention/security signage warning of the use of CCTV and forensic marking solutions should be installed on the exterior face of the security fencing and any gates.
8. All inverter, substation, transformer, storage and control buildings/cabinets, including the monitoring cabin, should be fully alarmed with a monitored system and covered by CCTV. Appropriate security locks and devices should be installed on all equipment cabinets/storage areas and associated buildings. Locking device screws/bolts should not be easily accessible when closed, to deter by-passing of the locks themselves by a determined offender. One way security clutch head security bolts/screws or similar can also be utilised to prevent easy removal.
9. It is vital that appropriate security measures are installed, such as remotely monitored alarm systems and CCTV systems, that can report activations to mobile devices or alarm receiving centres (ARC), for example. These devices can alert against unauthorised access to the site in general.

10. We draw the applicant/agents attention to the Kent Police rural crime prevention advice and information at the following link:
<https://www.kent.police.uk/advice/advice-and-information/rc/rural-crime/>
11. Doorsets and gates/roller shutters should meet SBD Commercial standards and be certified, not just tested, by an independent third-party testing house. More information at the following link: [SBD Design Guides \(securedbydesign.com\)](https://www.securedbydesign.com)
12. Windows and the glazing should meet SBD Commercial standards – glazing should be laminated rather than just toughened. More information at the following link: [SBD Design Guides \(securedbydesign.com\)](https://www.securedbydesign.com)

If approved, site security is required for the construction phase. There is a duty for the principal 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.

Our comments are designed to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. 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 Design Out Crime Team and refers to situational crime prevention. This advice focuses on CPTED and Community Safety regarding this specific planning application.

Yours sincerely,

Carin Andrews

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