E-mail: [redacted]@kent.police.uk
Date: 4th December 2024
Ref: EN010135/EH1.AS-301

Location: Stonestreet Solar Farm, Aldington
Proposal: Erection of a Solar Farm

To Whom it may concern,

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 strongly recommend that the applicant takes this opportunity to review their current security arrangements regarding the pre-existing buildings, including perimeter security, alarm systems, lighting and CCTV

2. Perimeter security of the site, including gates, should be reviewed to control site permeability and prevent theft of property. A good standard of building security is very important in rural areas, especially for outbuildings that may not be visited for weeks at a time. Each site should be fully enclosed within a minimum 2m security fencing system or higher (we note the Indicative Fencing proposal). 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 should be considered around the boundary and along the existing footpath as an added layer of security

3. Consideration should be given regarding property boundary for any potential places where it could be made more secure:
• Densely planted buffers can be used to enhance boundaries. There are plenty of suitable native (non-toxic) prickly species.
• digging deep ditches to control and deter unwanted vehicle access
• if possible, having a single-gated access point to each site. Please refer to the Commercial 2015 Guide, Section 2: Physical Security Specifications for gates on SBD Design Guides

4. We recommend that all photovoltaic (PV) panels are individually security marked and all serial numbers recorded within a site inventory. In addition, the PV panels should be 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. Copper cable, transformers, inverters, switch gear and any other equipment of high value should also be security marked. This can be achieved by using unique identifiers, such as serial numbers on the insulation sheathing and with the use of forensic marking solutions. A full equipment inventory should be kept.

5. All string inverters, substations, transformer stations and buildings/ storage containers should be fully alarmed with a monitored system and covered by CCTV. All CCTV should comply with the Information Commissioner's Office guidance. Appropriate security locks and devices should be installed on all equipment cabinets 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.

6. We note CCTV cameras are proposed for this development "Cabling would also be required for power and data transfer associated with the CCTV system described below. This would generally follow the perimeter fence lines where the CCTV cameras would be located", which is greatly encouraged. We recommend monitored CCTV and alarms systems to be installed and operational to cover vulnerable elevations and site entrances in addition to point 5. 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.

7. Doorsets and windows should meet PAS 24:2022 as a minimum-security standard. All external doors should have a minimum of two locking points with locks that meet the British Standard. All doors and windows that are not part of a designated fire escape route, should be closed and locked. Glazing for windows should be laminated rather than just toughened for security purposes. Please refer to the Commercial 2015 Guide, Section 2: Physical Security Specifications on SBD Design Guides (securedbydesign.com) for doorsets and windows

The following recommendations may be considered planning detail, however, from a general crime reduction and safety aspect, we recommend:

- Lone worker, emergency and staff safety procedures will need to be incorporated within operating and management processes, procedures and policy in line with any current legislation. The use of two way radios, mobile phones and other means to summon help (e.g. panic alarm) should be provided.
- All electrical compounds, inverter, substation, transformer, battery and control buildings/cabinets to be fully alarmed with 24 hour monitored systems and covered by CCTV. We note that CCTV is being proposed as detailed above.
- Appropriate security locks and devices should be installed on all equipment cabinets 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.
- Hinge pins for equipment cabinets, associated buildings and gates should be hidden when closed and/or fitted with anti-lift devices.
- All photovoltaic (PV) solar panels should be individually security marked and all serial numbers recorded within a site inventory.
- PV's 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.

- Where possible, the installation of individual alarms for each PV panel, with automatic reporting to the alarm company, should the PV panel be tampered with or removed.
- Copper cable; transformers; inverters; batteries; 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.
- 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.
- Additional defensive planting of natural hedging can also be considered around the boundary as an added layer of security.
- As detailed above, the site operational areas should be fully enclosed within a minimum 2m fencing system. 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.
- Any public footpaths through the site of the arrays should be fenced to 2m on either side of the path.
- Given the large amounts of valuable equipment and copper cable likely to be on site during construction, it is essential that the main site and any smaller temporary compounds are secured with appropriate temporary alarms and CCTV systems, particularly if security guards are not to be employed during construction. Any tool containers, plant (e.g. excavators) and associated fuel bowsers/bunded fuel tanks should also be secured, alarmed and immobilised at the end of each working day.

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,

[redacted]

Designing Out Crime Officer
Strategic Prevention Command