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Date: 30 October 2017
Ref: Y17/1132/SH/LM1

Dear Miss Lennon

Thank you for your email dated 26 October 2017 and for the opportunity to comment on the application detailed below:

Application Ref: Y17/1132/SH
Parish/Area: East Folkestone
Applicant: Mrs Ling Dadswell
Location: Ground Floor Business Premises 113 Sidney Street Folkestone Kent CT19 6HQ
Proposal: Installation of Bank of Ireland ATM with Reflective Advertising Collar surround to north elevation

Comments

I have considered the planning application detailed above with regards to Crime Prevention Through Environmental Design (CPTED) matters, in accordance with the National Planning Policy Framework 2012 (Section 7 Para 58 & Section 8 Para 69) and the DCLG Planning Practice Guidance March 2014 (Design Section - Paras 10 & 11) – Crime Prevention, the Kent Design Initiative (KDI) - Design For Crime Prevention document dated April 2013.

Having reviewed the on line plans, I was unable to find a Planning Statement and/or a Design and Access Statement, these would normally detail what general crime prevention/CPTED measures have been considered or incorporated for a proposed ATM. To date, the applicant has not consulted us before submitting this application and we would strongly encourage the applicant to contact us for this and any future proposals.

The huge collateral impact of 'ram raid' crimes against ATMs has a significant effect on the fear of crime in local communities.

Risk factors can be mitigated by visible deterrents such as improved lighting, CCTV monitoring, internal and external alarms, enhanced anchorage, appropriate security bollards (not parking) and cash degradation measures, all detailed below.

Particular concerns have been created where significant damage to a building structure has resulted following an ATM attack (e.g. ram raid or gas attack), there is therefore, a need to consider the health and safety implications and liabilities for staff, members of the public and any residents who may live close to where ATMs are housed with an appropriate risk assessment.

The photographs submitted to support the application, show residential accommodation on 2 stories above the proposed siting of the ATM and additional accommodation within the site boundary.

Page 1 of 3

The following crime prevention measures can help reduce attacks on ATMs and we strongly recommend that if this new ATM is given planning consent, the following security measures are installed as part of any planning conditions:

- The ATM to be installed in accordance with the ATM Industry Association (ATMIA - Europe) & ATM Security Working Group (ATMSWG), Best Practice For Physical Security Guide, guidance, in order to complement and enhance community safety.
- As it is possible for vehicles or plant machinery to approach the front of the ATM, at least 2 anti-ram raid bollards should be installed in front of the proposed ATM to conform to IWA 14.1 specifications (formerly PAS68/69).
- The installation of a defensible/personal space area should also form part of any planning conditions, in order to reduce the opportunity for criminals to "shoulder surf" for pin numbers and user details along with other ATM crime related incidents. Personal space can be achieved by the use of painted pavement hatching or a change in pavement colour or material. The proximity of the telephone kiosk does potentially provide a place for criminals to watch users for pin codes and/or gain a vantage place to apprehend users and should be addressed.
- A fully monitored 24 hour attack alarm system should be installed within the ATM and be linked to a remote alarm monitoring company. The shop's alarm system should also be linked to a central monitoring station.
- An ATM filling room with an internal door would generally be installed in accordance with the ATMSWG guidelines and specifications. This proposed plan seems to indicate that there will be no filling room. If this is the case, appropriate security for filling the machine would have to include the shop being securely closed and only staff on site while filling was undertaken for the protection and safety of those filling the ATM, be it a Cash In Transit (CIT) company or filling by the stores staff. Monitored panic alarms should be fitted for staff use should anyone try to gain access from inside the shop
- The installation of an internal ATM anchorage system with crime prevention signage.
- Other internal security devices such as forensic marking solutions, dye or glue note degradation packs should be installed. Signage to confirm that these measures are in place will help deflect potential ram raids.
- The ATM should be fitted with a tracker system and be marked with a unique identifier/security code. Signage to confirm that these measures are in place will help deflect potential ram raids.
- Cash limits should be kept to a minimum.
- Crime Prevention signage should be displayed informing the public who to contact in an emergency if they were to see a skimming device or anything else suspicious around the ATM.
- Dedicated external CCTV cameras to be installed at high level to cover the approach to the front of the ATM and lower level for facial recognition along with appropriate lighting to aid image capture. CCTV signage will also be required.
- Submission of a Design and Access Statement (D&AS).

- The building, locks and glazing surrounding the ATM should be to the appropriate British Standard and if the ATM is housed in glass, the glass needs to be ballistic proof. The current on line photographs submitted to support the application show a roller shutter where the ATM is proposed to be sited.
- The current on line photographs submitted to support the application show an external area between the telephone kiosk and the proposed ATM, occupied by a Euro cart style bin, this would have to be removed and the area kept clear to enhance the natural surveillance opportunities.

If you have any queries regarding the above, please don't hesitate to contact me.

Yours sincerely

L. Mason.

Crime Prevention Design Advisor
CPDA Team



For 'Secured by Design' standards and application forms, visit the 'SBD' website at www.securedbydesign.com