

Pencadlys Heddlu

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Penybont
CF31 3SU

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Police Headquarters

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In an emergency always dial **999**
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17th April 2023

FAO: Planning Officer – **Huw Roberts**

Planning Department

Merthyr Tydfil CBC

RE: P/23/0065 | Outline application for erection of a mixed leisure development comprising Indoor Snow Centre (up to 39,200 sq m), Water park (up to 7,500 sq m), Indoor Activity Centre (up to 9,000 sq m), Outdoor Activity Centre, Hotel Accommodation (up to 418 bedrooms), Woodland Lodge accommodation (up to 30 units), car parking (up to 830 spaces) and associated earthworks, access, drainage, servicing and utilities connections/infrastructure | Land To The South West Of The A470/A4102 Roundabout At Rhydycar West Merthyr Tydfil

Dear Huw,

South Wales Police have reviewed the following documents in relation to the above Outline Planning Application;

- RHDR-HMA-LE-ZZ-DR-A-PL-010-Outline Masterplan-S0-P3
- Design and Access Statement
- ES Appendix 12.6 Public Routes within the Site
- ES Appendix 16.1 Lighting Assessment

The application relates to a Leisure Development, which will comprise of the longest, indoor, multi-run snow centre in the UK. It is expected to become a centre of excellence for snow sports, including para sports and is seen as a possible “game changer” for UK Olympic and Para-skiers and snowboarders. As well as the snow centre, there will be accommodation in the form of Luxury Spa Accommodation, Family Resort Accommodation,

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Sport and Value Accommodation, suitable for school trips and also Woodland Lodge Accommodation. There will be an indoor and outdoor Water Park and an indoor and outdoor Adventure Centres. A large Car Park will accommodate parking for up to 830 spaces.

South Wales Police have no objection to this application and are very keen to work with the developers so that a Secured By Design Gold Award could be attained for the whole site. Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that Secured by Design widely supports. However, it is imperative that they must also be safe, secure, and accessible. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, cohesive, vibrant and participatory communities. Academic research findings have proven SBD to deliver significant crime reductions and cost efficiency savings for a wide range of stakeholders including local authorities, housing associations, landlords, residents and the police service. The police service continually re-evaluates the effectiveness of Secured by Design and responds to emerging crime trends and independent research findings, in conjunction with industry partners, as and when it is considered necessary and to protect the public from crime.

It is worth noting that the **“Protect Duty Bill” (Martyn’s Law)** is currently going through various stages of Parliament and although it has not become law at this stage, it is likely to come into effect by 2024. The Protect Duty Bill will take a two-tiered approach as below;

Standard- will drive good preparedness outcomes. Locations with a maximum occupancy of **greater than 100 people** at any time will be required to undertake low-cost, simple yet effective activities to improve protective security and preparedness. This will be achieved by accessing free awareness raising materials and development of a basic preparedness plan considering how best a location can respond to a terrorist event in their locale.

Enhanced- focussed on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an **occupancy of 800+ at any time** will additionally be required to take forward a risk assessment and subsequently develop and implement a security plan. Enhanced Duty holders will be required to meet a reasonably practicable test.

Premises will fall within scope of Martyn’s Law where **“qualifying activities”** take place.

This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions, temporary events, Places of Worship, health, and education. It is proposed that Martyn’s Law will apply to eligible locations which are either: **a building (including collections of buildings used for the same purposes, e.g., a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known.** Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

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I make the following recommendations so that the Secured By Design Gold (SBD) Award can be achieved. I have based my recommendations on the proposed, likely or potential risks associated with this development and the current crime profile for the area.

It is worth noting that no crimes have been recorded near to the proposed site as it is mostly inaccessible and thick with foliage and existing plant life. The only recorded incidents have been reports of off-road bikes on the mountainside. However, contractors for other large developments in the local area have experienced numerous thefts of diesel and machinery. **It is recommended therefore, that measures are taken prior to construction, that will provide sufficient security to prevent this type of crime from occurring.**

The below crime profile has been taken from the **Police.Uk** website and relate to the Ward in which the proposal sits. They are for the period of March 2022 to February 2023;

Anti-Social Behaviour	70
Burglary	14
Vehicle Crime	24
Criminal Damage and Arson	65
Other Theft	31
Violence and Sexual Offences	142
Public Order	46
Drugs	7
Bicycle Theft	2

Observations and Recommendations:

It is good to see that the principles of Secured By Design have been included in the Design and Access Statement and South Wales Police are happy with the overall layout. The following recommendations will help to ensure that the site achieves the Secured By Design Gold Award.

(i). Perimeter Security.

1. The whole of the site should be protected at the perimeter, by fencing and gates that meet the standard of Secured By Design (SBD) – LPS 1175 SR1 or equivalent.
2. The fencing should be at least 1.8m in height and at least 2m in height where it abuts public, open space.
3. Fencing should be sited on a hard surface or buried within the ground and be difficult to climb over.

REASON: To prevent crime and unauthorised access onto the site.

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(ii) Lighting.

It is understood that Lighting on the development is to be considered as part of “Reserved Matters” and that there will be a need to create a balance between personal safety and the inherent ecological sensitivities of the site. With careful consideration of a lighting plan, it will still be possible to achieve SBD.

4. Lighting on the whole development must be effective and complement CCTV.
5. Lighting in all public spaces must meet the British Standard 5489:2020. This will include areas such as the Piazza, accommodation areas and car parks.
6. Bollard Lighting should only be considered for decorative purposes as they do not provide facial illumination.
7. Further information can be found on the SBD website www.securedbydesign/lightingagainstcrime.

REASON: To enhance community safety.

(iii). Boundary Identification.

8. Defensible space using symbolic barriers e.g. pillars, rumble strip, or a change of road surface, i.e. colour or texture, must be built into the design to encourage a feeling of territoriality amongst users especially at the entrance to the development.
9. There must be a change of surface, i.e. colour or texture to identify public areas from private or semi-private areas.
10. In the case of the Lodges, each will require a clear boundary demarcation to promote a sense of privacy. More detailed information will be provided with a more detailed plan of the accommodation.

REASON: To assist in differentiating from public and private space and reduce anti-social behaviour.

(iv). Landscaping and planting.

Poor landscape design proposals can compromise the safety and security of people and properties. Hiding places can be created and visibility significantly reduced if trees and shrubs are poorly positioned, and species inappropriately chosen and maintained. This may increase the opportunity for crime and increase a person’s sense of vulnerability, which ultimately will affect the level of use.

11. Overgrown shrubs and other thick barriers that are in close proximity to public areas must be avoided and clear sightlines must be maintained over long distances.
12. Windows and doors must not be obscured.
13. Landscaping features and trees in public areas must not have any foliage below 2 metres from the ground.



14. Trees and other landscaping features must not be positioned where they could create hiding/entrapment spaces, obscure signage and lighting or provide a potential climbing aid into properties.
15. Planting schemes should take into account growth rates, height and spread and regular maintenance should form part of a "Maintenance Plan".
REASON: To enhance community safety.

(v) Vehicle Access, Pedestrian Access and Control.

16. External barriers that conform to IWA 14 (PAS 68/69) should be put in place to provide a strengthened perimeter in order to prevent/control access to pedestrian areas/crowded places.
17. Measures should be put in place that reduce the speed of vehicles approaching the main event buildings by means of bends or chicanes. These would be located in the areas of 'run up' to these buildings, or where large groups of persons congregate. Ideally vehicles would not be allowed to encroach within 30 meters of the build line.
18. Vehicle and pedestrian areas on site must be separated.
REASON: To enhance the safety of pedestrian and vehicle users on the site.

(vi). Vehicle parking.

19. The perimeter of vehicle parking areas must be clearly defined with the entrances/exits clearly marked.
20. The parking surfaces must be of good quality with parking bays clearly marked.
21. Vehicles should be directed by arrows to move in a circulatory direction and have clearly marked areas for pedestrians.
22. Parking areas must be well lit with the lighting meeting the relevant British Standard of BS 5489:2020 and complement the CCTV coverage.
23. There must be clear lines of sight across the parking bays and every bay must be protected by monitored CCTV.
24. The Car Park should be built to meet the Park Mark standards. Further information can be found on the following website www.britishparking.co.uk
REASON: To prevent vehicle crime and enhance community safety.

(vii). Buildings and Accommodation.

25. Buildings should be orientated so that they overlook public space and neighbouring buildings to support informal oversight by those who use and visit the site. It is good

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to see that this has been taken into account and the “Design and Access Statement” relates to “active frontages to all public spaces”. This will help to provide good, natural surveillance.

26. Walls constructed, for example of alloy sheeting with a sandwich of soft insulating material can be vulnerable to attack by chain saw etc. If such materials are to be used in respect of this development, the first 2 metres in height should be brickwork or materials of a similar strength.
27. Deep recesses or alcoves should be designed out and there should be clear lines of sight around a building.
28. The roofs of buildings must be solidly constructed and protected. Access to the roof areas must be made difficult.
29. Roof lights, where necessary, must be of a polycarbonate construction and secured by non-return screws. Roof glazing and service openings, where present should be protected.
30. External pipe work should be recessed into the fabric of the building.
REASON: To prevent burglary and enhance community safety.

(viii) Access Control

31. Vehicle and visitor access onto site must obviously be controlled.
32. Access from public areas into private areas in, for example the offices, the hotels, Water Parks, Adventure Parks etc., must be controlled e.g. by proximity readers.
33. Rooms where valuable property or information is stored must be kept locked when unoccupied.
REASON: To enhance the safety of residents.

(ix). Cycle Store

34. Cycle Storage must meet SBD standards. Further security information on Cycle Storage can be found on the Secured By Design website www.securedbydesign.com
35. Cycle stores must be protected by CCTV and appropriate lighting.
REASON: This will ensure that such stores are only accessible to residents and will prevent burglary and theft of pedal cycles.

(x). Bin stores.

36. Bin stores must be secure areas and preferably located away from the main buildings to prevent arson attack.
REASON: To control and preserve the cleanliness of the area and prevent arson.



(xi). Door security.

- 37. All external doors fitted to buildings e.g. the Lodge accommodation, Water Parks and Adventure Parks etc. should, where possible, meet Secured by Design standards i.e. LPS 1175 SR2, PAS 24:2022 or equivalent. If this not possible the doors and windows should be manufactured and installed to Secured by Design standards and specifications.
- 38. Fire doors must have no external furniture fitted and be alarmed.
- 39. All vertical lift doors must be locked in place, internally and externally, when the units are unoccupied.
- 40. In respect of operating mechanisms external fittings must be avoided. Internal mechanisms must be secure and sited away from the door openings.
- 41. All glass in door panels or panels adjacent to doors should be laminated (7.4mm) with appropriate fixings.
REASON: To prevent burglary.

(xii). Window security.

- 42. All vulnerable windows fitted, e.g. ground floor windows, windows above flat roofs, Lodges, Water Park and Adventure Park must meet the SBD standard i.e. PAS 24:2022 or equivalent and be third party tested and certificated. They should also have key operated window locks fitted.
REASON: To prevent burglary.

***** Please Note *****

PAS 24:2022 was published by BSI and came into effect on 30 September 2022. This PAS supersedes PAS 24:2016, which has been withdrawn. There will be a transition period where SBD will be allowing both standards to run concurrently for a period of 24 months, ending on 30th September 2024.

(xiii). Intruder alarm system.

- 43. Commercial units, when unoccupied, should be alarmed i.e Snow Centre, Water Parks and Adventure Centres.
- 44. All rooms in the commercial units, where valuable property/ information is stored, should be protected by an alarm system linked to a central control room.
- 45. Personal attack alarms linked to the alarm system should be installed in areas where staff are likely to be vulnerable e.g. reception areas, cash offices, accounts offices etc.
REASON: To Prevent burglary.



(xiv). Cash handling.

46. Cash handling areas must enjoy good natural surveillance, be installed within a solid brick surround and ideally have an outward opening air lock door system.

REASON: To prevent theft.

I would be happy to work with the developer to achieve the Secured By Design Gold Award. Any further detailed information can be found on the Secured by Design website

www.securedbydesign.com

Please Note:

For the Secured by Design Award to be made PAS 24 2016 doors and windows **must be visibly and preferably permanently marked PAS 24 2016 and be third party tested and certificated**. If the stickers are not visible, developers will be asked to produce a certificate to confirm that the model windows that have been installed, have been tested and certified by a third party and that they meet the required Secured By Design standards.

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

Joy Nicholls (DOCO) and Terry Stevens (CTSA)
Design-Out Crime Officer and Counter Terrorism Security Advisor
South Wales Police

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Jeremy Vaughan
Prif Gwnstabl | Chief Constable

Heddlu De Cymru
South Wales Police

