

Planning Application

DOCOCO Report

Land South
Of Docks Way,
Newport
NP20 2NS

25/0991



Dear Newport Planning,

I am contacting you regarding planning application **25/0991** – Land South of Docks Way Disposal site - PROPOSED NEW BATTERY ENERGY STORAGE SYSTEM (BESS), TRENCHING FOR UNDERGROUND CABLING ASSOCIATED WITH THE SOLAR DEVELOPMENT APPROVED UNDER 23/0989 TOGETHER WITH ASSOCIATED WORKS

I have reviewed the development plans through the Newport Planning portal reference 25/0991. Should any of these drawings be revised with significant alterations to the building design, layout, and/or specification level can I please request these are forwarded on.

To support my recommendations around the design and layout, physical security requirements, and product recommendations I have reviewed the crime statistics for the ward area (Pillgwenlly) and specifically the proposed development site location of Docks Way for a 12-month period between 1st November 2024 – 1st November 2025.

From a Policing perspective the development is located in the Newport County Borough Council area, within the Pillgwenlly section and Pill Ward. The Pill ward is 1 of 4 wards located within the section of Pillgwenlly.

The analysis of the statistics for the development location has focused on crime/incident types that could potentially pose a threat, risk, or harm to the development and users of –

Crime/Incident Type	Ward- Pillgwenlly	*Site – Docks Way,	Demand % Ward v Site
Anti-Social Behaviour	403	6	1.4%
Residential Burglary	45	0	0
Criminal Damage	174	1	0.5%
Theft(non-shoplifting)	95	0	0
Vehicle crime	80	1	1.25%
Bicycle Crime	19	0	0

**Site indicates with close proximity (same street, nearby/adjacent streets/roads of the proposed planning application.*

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.

When offering crime prevention and physical security advice we take guidance and best practice from the range of guides supplied by Secured by Design (SBD). Whilst the client is not seeking SBD accreditation for the development I have made recommendations below for the site.

General Layout and Perimeter security.

The whole site should be protected by security fencing, It is noted that the perimeter fence line is 3.3m in height.

Security fencing is effective at delaying or deterring intrusion because of the need to climb over or penetrate through the fence. It is therefore important that there are no structures close to or protruding over the fence that will act as climbing aids e.g. trees, lamp columns or the edges of other structures.

Consideration should be given to alarming the fence line.

It is recommended that security fencing is certified to one of the following minimum standards:

- LPS 1175 Issue 8 Security Rating B3, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- Sold Secure SS323 Silver, or
- LPS 1673 Issue 1 Attack Rating AR.A180

Barriers should control vehicle access onto site. This will help to prevent unauthorised access.

Public footpaths that lie just outside and adjacent to the boundaries of commercial developments can have a detrimental effect on security and, if it is not possible to have them re-routed away from the site, measures such as defensive planting, CCTV and/or secondary fence lines may need to be considered. However, none of these measures should be allowed to obstruct any natural surveillance that the footpath affords so long as this is thought to be an advantage in the specific circumstances of the site.

If the site is unoccupied, gates of the same standard as specified above should secure it. If padlocks and chains are used to secure the gates, they must meet appropriate security standards e.g. Sold Secure Gold. The locking of the gates should be part of a wider Management Plan of the site.

Any access control system should be compatible with the gates that are being installed.

The height and length of gates shall be consistent with the dimensions of the boundary fence into which they are set and shall close any gap beneath them to ground level, to account for the change in road or pavement levels and/or camber.



It is recommended that gates are certified to one of the following standards:

- LPS 1175 Issue 8 Security Rating B3, or
- STS 202 Issue 12 Burglar Resistance BR2, or
- Sold Secure SS323 Silver, or
- LPS 1673 Issue 1 Attack Rating AR.A180

A gate should not be capable of falling through single point failure, such as one hinge breaking. Gate Safe recommend that gates have three hinges, although a suitably sized tether for the size of the gate could be used to prevent the gate from falling if the hinge fails. In the event that a gate has an inverted hinge to prevent it being lifted off the post, two tethers must be fitted to the top and bottom of the gate, as an inverted hinge is no longer load bearing. Further information is available at: www.gatesafe.org or BS EN 12604

REASON: To prevent crime and unauthorised access.

Vehicle access/Parking bays.

The routes from the site entrance to the reception and to the car parks and delivery points should be clearly defined and benefit from as much natural surveillance from the reception area and other occupied offices as possible. Authorised visitors should ensure that the gates are locked behind them if there is no electronic access control on the gates.

The perimeter of the car parking areas must be clearly defined and access confined to the main vehicle entrance/exit points.

All vehicle and pedestrian entrances/exits of the site should be covered by CCTV.

Vehicle parking areas must be well lit, ideally the lighting meeting the British Standard 5489-1 2020. All vehicle parking bays should be protected by monitored CCTV.

There must be clear lines of sight across the vehicle parking areas with any planting being low level. Ideally these areas would be overlooked by the buildings.

REASON: To prevent unauthorised access and vehicle crime and to promote a feeling of safety.

Telecommunication/Power Cables.

Telecommunication cables shall enter buildings below ground and be protected by secure access covers certified to a minimum of LPS 1175 Issue 8 Security Rating A3 or STS 202 Issue 12 Burglar Resistance BR2 and be positioned in highly visible locations. Increased security measures may be required if a crime risk analysis identifies that such measures are necessary and commensurate with the risk. This will help to delay or prevent the occurrence of burglaries where the perpetrators cut the VSS or alarm signal prior to committing an offence.

It is important to remember that often business continuity may rely on the intruder and fire alarm's ability to signal an alarm receiving centre via a secure telephone line. Therefore, it is vitally important that sufficient secure ducting is supplied to the site with an appropriate number of secure access covers to cater for both the current requirements and any future site expansion.



It is important that any cable taken to the site is stored out of sight and within a secure container. This is particularly important during the build phase of this site, as the location of the site could leave it vulnerable to theft.

Utility access covers, protecting access to drains, sewers, telephone cables, electricity cables and other services, must be secured to prevent access and damage by unauthorised persons.

Ensure that there is an alarm and CCTV covering any storage area for this type of cable, while the site is in the construction phase.

REASON: To prevent theft of cable.

Cable

Cable should be clearly marked with serial number and 'property of XXX'

Forensic marking should be applied to the cable.

REASON: Reduce the payoff.

Lighting.

Lighting on the whole estate must meet the British Standard 5489 -1:2020 and be in line with Local Authority requirements.

Bollard Lighting should only be considered for decorative purposes and wayfinding, as they can be easily obscured and do not project sufficient light, at an appropriate height to provide facial illumination, which can increase the fear of crime.

Lighting must be situated in elevated positions to prevent vandalism and be protected by vandal proof housing.

External illumination when the building is unoccupied is recommended for entrance gates and routes to the main entrance and doors, car parks (if occupied by vehicles) and observable building elevations.

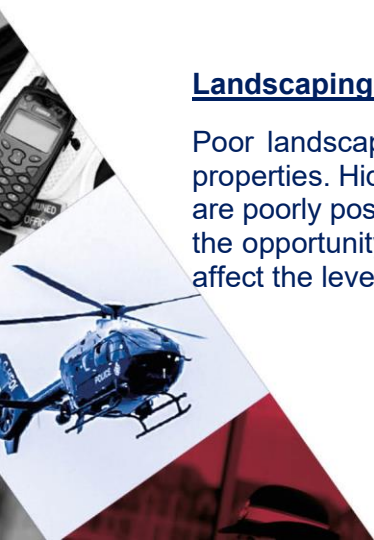
In some circumstances, and especially where security guards are monitoring the building from outside, it may be useful to direct lighting at the building to aid intruder detection.

Lighting must be effective and be coordinated with a CCTV installation (when specified) and enhance any CCTV coverage.

REASON: To enhance the feeling of safety and to prevent and detect crime

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.



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. As a rule, building frontages should be open to view except, for example, houses standing in their own private grounds. Attention should be given to the location of walls and hedges so that they do not obscure doors or windows, and the position of trees that may become climbing aids into property or obscure lights or CCTV cameras.

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. Windows and doors must not be obscured by landscaping features and trees in public areas must not have any foliage below 2 metres from the ground.

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.

REASON: To enhance community safety and eliminate hiding places.

CCTV.

The effective use of CCTV sits well within an overall framework of security management. CCTV systems must be installed to BS EN 62676: Video surveillance systems for use in security applications.

The CCTV system should be compatible with the existing or planned lighting system and landscaping proposals.

Consideration should be given to alarming the fence line so that any activity will activate the CCTV. This will assist any potential Security Personnel, in directly identifying any areas of fence line that may become a target and eliminate opportunity for human error.

A Public Address System could also form part of the CCTV requirement, operated by a monitoring company and also linked to an alarm.

CCTV must be installed to cover the main entrances of the buildings, all vehicle entrances and the rear of units and will ideally be monitored.

The CCTV capability will require sufficient resolution to provide evidential imagery to at least facial recognition standard, to help identify individuals and read vehicle number plates. Fixed cameras must be deployed at specific locations for the purpose of obtaining such identification imagery. An "Operational Requirement" (OR) must take into account this fact and decisions made as to what locations around the buildings are suitable to provide this detail of image. In areas of high crime, CCTV installations should be protected with vandal resistant housing.

Recording must be in colour, it must record a minimum of 25 images per second and images be time and date stamped.

Signage should be placed around the perimeter and inside of the development advertising the fact that CCTV is in operation.



CCTV systems should be registered with the Information Commissioner's Office (ICO) and be compliant with guidelines in respect of Data Protection and Human Rights Legislation. Further information regarding the use of CCTV can be found on the following website www.ico.org.uk

For guidance on the use of CCTV images as legal evidence, see BS 7958:2015 Closed circuit television (CCTV). Management and operation. Code of practice. This document provides guidance and recommendations for the operation and management of CCTV within a controlled environment where data that may be offered as evidence is received, stored, reviewed, or analysed. It assists owners of CCTV systems to follow best practice when gathering information of evidential quality. Remotely monitored detector activated CCTV systems must be installed in accordance with BS 8418:2021 Design, Installation, Commissioning and Maintenance of Detection-Activated Video Surveillance Systems (VSS). Code of practice.

The Biometrics and Surveillance Camera Commissioner has updated the Surveillance Camera Code of Practice which is available at [Amended Surveillance Camera Code of Practice \(accessible version\) - GOV.UK](http://Amended%20Surveillance%20Camera%20Code%20of%20Practice%20(accessible%20version)%20-%20GOV.UK)

In addition, the passport to compliance, which is aimed at large public-space surveillance camera systems such as town centre schemes operated by local authorities is available at: www.gov.uk/government/collections/surveillance-camera-guidance-tools-and-templates.

The recommended standards for the surveillance camera industry can be found at www.gov.uk/guidance/recommended-standards-for-the-cctv-industry.

REASON: To prevent Theft and Burglary and to help in the detection of crime.

Modular Units

The design of the units must take into account the need to prevent features that aid scaling or climbing and hidden areas must be designed out.

Recessed areas/doorways will obstruct natural surveillance and also collect wind-blown litter, that can be used to start fires. It is best to avoid recessed areas as this will negate the expense of having to provide another CCTV camera to cover this location.

REASON: To prevent Burglary.

Intruder alarm systems.

The whole site should be alarmed and the alarm system should be linked to a central monitoring station.

All rooms where there is valuable equipment or information stored should be alarmed and any alarm wires should be protected.

Consideration should be given to alarming the fence line – as above.

Security fogging devices can be incorporated within the intruder alarm system to disorientate the intruder when the alarm system is activated. They must conform to BS EN 50131-8:2019 Security device fog systems.



REASON: To help prevent and detect Burglary.

Access control.

Access into the site and from public areas into semi-private and private areas, must be controlled via access control e.g. fob, swipe card etc.

Entry into all rooms where valuable equipment is sited should also be controlled and these rooms must be kept locked when not in use.

Access control should meet Secured by Design (SBD) standards and specifications and be compatible with the SBD Door-set.

REASON: To prevent unauthorised access and theft.

Further information -

Unfortunately, during the build process developments can vulnerable to crime due to the materials, products and machinery stored on site. Guidance around site security can be found through the Secured by Design Construction Guide –

[CONSTRUCTION SITE SECURITY GUIDE A4 8pp.pdf \(securedbydesign.com\)](#)

If you have any further questions, please do not hesitate to contact me to discuss.

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