



**Kent  
Police**

**Protecting and serving the people of Kent**

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Date: 16<sup>th</sup> August 2022

Ref: 22/00668/AS/CA.1/AS-255

Dear Alex Stafford,

Thank you for the opportunity to comment regarding:

Application Ref: 22/00668/AS  
Location: Land south of M20, Church Lane, Aldington, Kent  
Proposal: Installation of a solar farm with a generating capacity of up to 49.9MW comprising: ground mounted solar panels; access tracks; inverter/transformers; substation; storage, spare parts and welfare cabins; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compounds; and associated infrastructure and planting scheme.

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](http://www.securedbydesign.com).

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. The design, layout and landscaping of this development should take account of the security of people and property and incorporate measures to reduce or eliminate crime.

**If this application progresses, we would like to request that a planning condition is included as part of the planning approval to ensure that Crime Prevention is addressed effectively in this proposal. We suggest that a crime prevention statement is submitted as part of this application to address our comments and to provide further information**

**in relation to physical security and security measures to be adopted. We welcome a discussion with the applicant/agent about site specific designing out crime.**

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

1. We strongly recommend that the applicant take this opportunity to review their general security arrangements regarding perimeter security, alarm systems, lighting, CCTV and physical security of buildings.
2. Perimeter security of the site, including gates, should be clearly defined 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. 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. Hostile Vehicle Mitigation. Bollards or vehicle security barriers should be considered to prevent unauthorised vehicle access and should be to ISO IWA 14.1:2013 or BSI PAS 68:2013/ BSI PAS 69:2013 security standards specifications.
4. Consideration should be given regarding property boundary for any potential places where it could be made more secure:
  - planting thorny hedging to act as a natural barrier
  - 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 \(securedbydesign.com\)](https://www.securedbydesign.com/).
  - using locking posts or temporary obstructions to control large openings
  - invert and cap gate hinges
  - making sure fixing bolts are secure and use covered padlocks
5. 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.
6. 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, see [www.ico.org.uk](http://www.ico.org.uk) 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. For more information click [How to Choose an Alarm for your Property \(policesecuritysystems.com\)](https://www.policesecuritysystems.com/).

7. We note CCTV equipment is proposed for this development. We recommend monitored CCTV and alarms systems to be installed and operational to cover the perimeter fence lines, site entrances for all parcels and vulnerable elevations of buildings 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.
8. Doorsets and windows should meet SBD specifications for commercial developments 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 \(securedbydesign.com\)](https://securedbydesign.com) for doorsets and windows.
9. Given the amounts of equipment and copper cable likely to be on site during construction, it is essential that the site is secured, and appropriate temporary alarm and CCTV systems are installed, particularly if a security guard is not to be employed during construction. Any plant and associated fuel bowzers should also be secured, alarmed and immobilised at the end of each working day.

SBD includes a list of products that have been awarded the 'Police Preferred Specification' status, which includes doorsets, windows, CCTV, boundary and perimeter treatment, among others. For more information, please click the link [Accredited Product Search \(securedbydesign.com\)](https://securedbydesign.com).

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.

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