



**Kent
Police**

Protecting and serving the people of Kent

Gravesham Borough Council
Planning & Regeneration Services
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

E-mail: Alistair.hendry@kent.police.uk

Date: 11th July 2025

Ref: 20250662/AH.1/G-400

Location: Land Outside 30 New Road Gravesend Kent
Proposal: Installation of 1 no. new communications Kiosk with integrated defibrillator and advertising display.

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.

I have reviewed the submitted documents and crime statistics for the local area for this application. Colleagues around the country were consulted to obtain up to date feedback on issues where these units are currently installed and active. I have significant concerns with the proposed units, as I do not believe that the resultant development would meet the requirements of:

- The National Planning Policy Framework 2021 paragraph 92(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...
- The National Planning Policy Framework 2021, paragraph 130(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".

Whilst I acknowledge the benefits that free calls and Wi-Fi will bring to members of the public, I also have significant concerns regarding the opportunities for crime and ASB that they may create. Please see below for detailed reasons for concern;

Public Safety

High Streets and adjacent areas create significant demand on policing in terms of incidents, particularly during The Night Time Economy. These areas are deemed crowded places because of the number of people occupying the streets day and night. They require additional protection for the public in the form of formal police live-monitored CCTV. It is imperative for police to be able to monitor in real-time what is happening in these areas, and for the officers monitoring the cameras to be able to accurately identify, track, record and report incidents as they are happening. These CCTV cameras are utilised daily to detect and record crime, and also to direct officers to incidents or track and intercept offenders as they attempt to escape. The footage they capture is regularly used in formal criminal proceedings as evidence to prosecute offenders and can sometimes, be the crucial piece of evidence in securing a prosecution.

Following consultations with colleagues within our CCTV Office, it has been identified that the proposed location of new illuminated advertising boards can have a detrimental impact on our ability

to monitor and detect crime utilising our CCTV network. This has had a direct detrimental impact on our operational response to crime or incidents in progress at these locations, undermining our ability to apprehend and prosecute offenders. The glare caused by these screens creates problems for our CCTV cameras, in that the brightness of the screen creates colour contrasting, darkening and softening of the images, reducing visibility and our ability to identify and monitor individuals. In addition, depending on the advert being displayed, we also experience colour casting, which again affects our ability to identify and describe individuals being monitored. Previous incidents have included inaccurate descriptions being given out to officers on the ground, offenders being lost in pursuit, and footage being of such low quality that it has no evidential value. We have experienced incidents elsewhere where passive CCTV images are also of no evidential use as the advertising screens in shot have diminished the picture quality.

Despite these areas being lit with street lighting, the brightness of proposed advertising boards interferes with the internal image processing mechanisms of the CCTV cameras themselves. The way images, brightness and focus are processed by cameras means that there is little to nothing police can do to improve the impact that these signs have on the camera image quality when live tracking an incident. A common problem experienced by the police is when tracking an individual during a crime in progress, the CCTV operator moves the cameras to follow them wherever they are going – when one of the illuminated advertising boards comes into shot, the camera automatically reacts to this sudden light source, often throwing the image brightness, contrast and focus out. This can take several seconds to correct itself, giving offenders ample time to escape from view and avoid capture.

Kent Police has a focus on public safety and preventing sexual violence in the Night Time Economy. A significant element of our effective response is our ability to monitor areas of Night Time Economy as described above, and at present our CCTV control room is able to maintain reasonable coverage to maintain public safety. We have significant concerns that if additional light sources, particularly of the type submitted in this application are introduced, then our coverage would be impacted to the point that it may create a public safety risk.

Drugs offences & ASB

Evidence around the country, particularly in city centre locations, shows that these units are regularly abused to support the purchase and supply of illegal drugs. Dealers and buyers of drugs are known to utilise the free Wi-Fi facilities and free calls to anonymously arrange for drug deals to take place. This is of particular concern where units are proposed in locations that are not currently covered by police monitored CCTV. This abuse of the units also creates a noted increase in antisocial behaviour around the unit, with users regularly congregating to make use of the free Wi-Fi and phone charging, whilst behaving in an antisocial manner.

Misuse of the 999 call button

Evidence from colleagues elsewhere in the country shows that there have been incidents of misuse of the 999 call button, again mainly in city centre locations. Misuse tends to be in the form of drunk people pressing the button for no particular reason, or to ask for taxis for example. This misuse of the system creates additional demand on already stretched 999 call centres, increasing the time spent waiting for real emergencies. Additionally, where BT units are proposed in areas where we do not have CCTV coverage, misuse of the 999 button may result in officers being unnecessarily dispatched to check on callers, if we are unable to verify misuse at the point of the call.

"Honey Pot" Vulnerability and pickpocketing

The provision of device charging and free Wi-Fi facilities creates an ideal location for criminal gangs to focus their attention. Pickpocketing is one of the most significant types of crime reported. The provision of charging and a Wi-Fi spot creates a honeypot effect, whereby a number of people with desirable technology such as phones and cameras may be encouraged to congregate in a small area. This provides the ideal opportunity for criminal gangs to focus their attention, where people are congregated and vulnerable due to being in a different place and may have lowered their guard

because of this. The provision of charging facilities also creates a risk that unless closely guarded, valuable possessions may be plugged in to charge, and left vulnerable to distraction/snatch theft.

Street clutter / pinch points

The proposed location of some BT Smart Hubs introduces additional pinch points, where the width of the footpath is reduced, creating spaces where an offender such as a pick pocket is provided a legitimate excuse to be within very close proximity of an offender. The height and width of the units also creates ideal hiding places, which reduce forward visibility for pedestrians. In addition, it would be impossible for someone walking towards a unit to know if an offender is hiding on the other side of it until they are directly alongside them.

Cycle theft

In addition, the proposed location of some units significantly reduces surveillance over cycle storage racks, which creates increased opportunities for cycle theft. Not only is natural surveillance compromised, but in some locations formal surveillance (Police CCTV) would also be significantly impacted. For this reason, it is imperative that all cycle parking areas are safe and attractive places to park. They must be located where they have a high level of natural surveillance, and where formal surveillance is not impeded, which acts as a deterrent to would be thieves.

Criminal damage

I have concerns that these units may be vulnerable to vandalism and criminal damage, particularly to the computer screen that facilitates phone calls, should the user get frustrated that the function has been suspended or isn't working. Should the units be damaged, it is imperative that there are mechanisms or management processes in place to ensure that this is quickly identified and repaired. Failure to do so promptly not only damages the street scene, it has been proven to perpetuate further offences around the location of the damage (Ref. Wilson and Kellings broken windows theory).

However, should this application be granted, I ask that the following condition be placed upon the approval:

This Street Hub must be managed in accordance with the BT Street Hub ASB Management Plan and must include the ongoing use of an algorithm to identify repeated anti-social number use, with a review after the first three months of installation between police and BT to assess any issues arising. Any change to the ASB management plan should be approved by the local planning authority and the Kent Police Designing Out Crime team.

This should also be for the lifetime of the device.

Reason: In the interests of good design and the creation of development where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

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. 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 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,

D000.

Designing Out Crime Officer

Strategic Prevention Command