



STAFFORDSHIRE
POLICE

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Date: 23rd June 2023

Application: SMD/2022/0184
Location: Endon Garage, Leek Road, Endon
Proposal: ATM installation through brick wall to left of shop front (retrospective)

The proposal has been reviewed with particular reference to Police CPI's Secured by Design guidance and in accordance with the recognised principles of Crime Prevention Through Environmental Design.

The following comments should be considered in the light of the following:

- Under the heading Promoting Safe and Healthy Communities, Para 92(b) of the NPPF 2021 states "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."
- Under the heading Achieving Well-Designed Places, Para 130(f) of the NPPF 2021 states "Planning policies and decisions should ensure that developments create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."
- Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states "Designing out crime and designing in community safety should be central to the planning and delivery of new development";
- Staffordshire Moorlands Local Plan - Design Consideration, Spatial Objective SO10 – "To deliver sustainable, inclusive, healthy and safe communities";
- The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998;
- The 2006 CABI document entitled 'Design and Access Statements: How to Write, Read and Use Them', which states "Statements should demonstrate how development can create accessible and safe environments, including addressing crime and disorder and fear of crime".

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1. The ATM should be subject to good natural surveillance during the bulk of the day due to the very busy nature of the forecourt, although of course, overnight activity levels and natural surveillance opportunities will understandably drop. The fact that the garage apparently operates 24/7 365 days per year is undoubtedly an extremely positive factor in reducing the opportunity and likelihood of the ATM being targeted.
 2. The applicant is well aware that ATMs and their users can be subject to a range of crimes, some of which use increasingly violent means to target the ATM with the potential in some circumstances to endanger public safety and cause significant damage to buildings. Crimes include 'shoulder-surfing' and distraction, personal robbery, card trap and skimming type devices being inserted or added, gas ignition attacks, drilling attacks from the front to access the internals, ram-raids, digging out ATMs with JCBs etc and more recently, albeit very rare, attacks using explosives.

3. There has been some transparency regarding the nature of certain security measures that will protect the ATM as detailed within the Design and Access Statement. It is important that various layers of protection are provided. The inclusion of a security plinth and other methods to anchor the ATM in situ, the monitored alarming of the ATM and the presence of a tracker are all viewed very positively. Specific operating procedures around replenishment etc are understandably not disclosed, but will need to minimise risk. It is to be hoped that the applicant has sought to comply with the publicly available document that seeks to offer good practice and minimum security standards in relation to the ATM itself and host premises - *'Best Practice for Physical ATM Security'* published by the ATM Security Working Group. Members of the British Security Industry Association also have access to their own document – *'Security of ATMs Effective Practice Guidelines'*.
4. CCTV cameras are one of the primary means whereby evidence can be obtained and crimes or suspicious incidents investigated when they occur in relation to ATMs. The presence of CCTV coverage can provide a deterrent to offending in the first place. CCTV footage can also aid more wide-ranging investigations where fraudulent activity (use of a stolen/borrowed card etc), money laundering etc is involved. There are apparently 5 external CCTV cameras which are recorded. Of course, the quality of the recorded images and whether these are securely stored is unknown. It would be advisable for the host premises to evaluate the quality of captured images and undertake any upgrading required to address any deficiencies identified. If images are stored on an HDD somewhere, it would be advisable to ensure it is within a locked cabinet which is secured in situ so that in a worst case scenario, any evidence is not simply removed by offenders. While cameras cover the forecourt, it does not appear as though one covers those using the ATM or the ATM itself. The host premises should seek to rectify this deficiency. Of note, a camera positioned looking down and capturing the top of someone's head would serve a very limited purpose.
5. The document 'Victimless Crime? The True Impact of ATM Crime on UK Communities' concludes with 'A Five-Point Plan Against ATM Attacks'. Number four on that list is Surveillance Equipment where it states 'Shopkeepers and ATM operators must work together to ensure that appropriate surveillance equipment is installed and working in the vicinity of every cash machine'. Staffordshire Police wholeheartedly support this stance and consequently recommend that the CCTV provision at the location is evaluated and improved where necessary, including adding an external CCTV camera providing a good level of coverage of the ATM and area in front of it (with supplementary warning signage) and capturing excellent quality images that might prove useful in furthering any investigation should the need arise.

Crime Prevention advice is given freely without the intention of creating a contract, and all comments and recommendations are site specific. Staffordshire Police and the Home Office do not accept any legal responsibility for the advice given.

David Elkington
Designing Out Crime Officer