

# **Crowded Places:** Impact Assessment of Guidance

March 2010





# **Crowded Places: Impact Assessment of Guidance**

March 2010

© Crown Copyright 2010

The text in this document (excluding the Royal Arms and other departmental or agency logos) may be reproduced free of charge in any format or medium providing it is reproduced accurately and not used in a misleading context. The material must be acknowledged as Crown copyright and the title of the document specified.

Where we have identified any third party copyright material you will need to obtain permission from the copyright holders concerned

ISBN: 978-1-84987-150-1

# Contents

---

## Crowded Places: Impact Assessment of Guidance

---

**The Assessment**

---

**3**



## Summary: Intervention & Options

<b>Department /Agency:</b> Home Office	<b>Title:</b> Impact Assessment of Crowded Places Guidance	
<b>Stage:</b> Publication	<b>Version:</b> 7.2	<b>Date:</b> 11 February 2010
<b>Related Publications:</b> N/A		

**Available to view or download at:**

[www.security.homeoffice.gov.uk](http://www.security.homeoffice.gov.uk)

**Contact for enquiries:** Home Office OSCT Crowded Places Team    **Telephone:** 020 7035 0886

**What is the problem under consideration? Why is government intervention necessary?**

The threat level to the UK is currently assessed as “Severe”. This means that a terrorist attack is highly likely and could take place without warning. Crowded places remain the preferred target for international terrorists and the most likely target for an attack is a crowded place which is easily accessible, regularly available and offers the prospect for an impact beyond loss of life.

**What are the policy objectives and the intended effects?**

Our objective is to reduce both the probability of an attack in a crowded place and the impact of any attack that may occur.

To achieve this we plan to issue guidance; to work with the National Counter-Terrorism Security Office (NaCTSO) to identify those crowded places which are at highest risk; to work with local partnerships to reduce risk in those crowded places which are at highest risk; to ensure a proportionate approach such that crowded places at low risk do not incur unnecessary costs; and to encourage designing-in of high quality protective security measures, both for retro-fit to existing sites and for new builds.

**What policy options have been considered? Please justify any preferred option.**

1. Do nothing – allow owners and operators of crowded places to continue as before, and accept the risk.
2. Two guidance documents to be published: one by the Home Office on good practice for local partners on how best to protect crowded places; and another by the Home Office and third parties on suitable protective security measures for new and retro-fit developments that is outside the planning framework.
3. Three guidance documents to be published: one by the Home Office on good practice for local partners on how best to protect crowded places; another by the Home Office and the Department for Communities and Local Government aimed at planners; and one by the Home Office and third parties aimed at architects and designers.
4. Legislate, enforcing suitable security measures for the highest risk buildings.

**When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? Within five years**

**Ministerial Sign-off** For publication of Impact Assessments:

*I have read the Impact Assessment and underpinning documentation and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.*

Signed by the responsible Minister:

*West of Spithhead*

.....Date:

11 March 2010

## Summary: Analysis & Evidence

<b>Policy Option: Base option</b>	<b>Description: Do nothing – allow owners and operators of crowded places to continue as before, and accept the risk</b>
-----------------------------------	--

<b>COSTS</b>	<b>ANNUAL COSTS</b>	Description and scale of <b>key monetised costs</b> by 'main affected groups'. Costs of implementing risk-reduction measures (public sector for Local Authority owned spaces; private for others). One-off costs for retro-fit of existing crowded places; ongoing for new-builds and process costs. Staff training.				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>One-off</b> (Transition)</td> <td style="width: 30%; text-align: center; padding: 5px;"><b>Yrs</b></td> </tr> <tr> <td style="padding: 5px;">£10s of millions *</td> <td></td> </tr> </table>		<b>One-off</b> (Transition)	<b>Yrs</b>	£10s of millions *	
	<b>One-off</b> (Transition)		<b>Yrs</b>			
	£10s of millions *					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Average Annual Cost</b> (excluding one-off)</td> <td></td> </tr> <tr> <td style="padding: 5px;">£100s of thousands *</td> <td></td> </tr> </table>	<b>Average Annual Cost</b> (excluding one-off)		£100s of thousands *			
<b>Average Annual Cost</b> (excluding one-off)						
£100s of thousands *						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Total Cost (PV)</b></td> <td style="padding: 5px;">£10s of millions *</td> </tr> </table>		<b>Total Cost (PV)</b>	£10s of millions *			
<b>Total Cost (PV)</b>	£10s of millions *					
Other <b>key non-monetised costs</b> by 'main affected groups' Reduction in public confidence. Impact on the economy in the short term. * ORDER OF MAGNITUDE ONLY						

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>	Description and scale of <b>key monetised benefits</b> by 'main affected groups'.				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>One-off</b></td> <td style="width: 30%; text-align: center; padding: 5px;"><b>Yrs</b></td> </tr> <tr> <td style="padding: 5px;">£ n/a</td> <td></td> </tr> </table>		<b>One-off</b>	<b>Yrs</b>	£ n/a	
	<b>One-off</b>		<b>Yrs</b>			
	£ n/a					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Average Annual Benefit</b> (excluding one-off)</td> <td></td> </tr> <tr> <td style="padding: 5px;">£ n/a</td> <td></td> </tr> </table>	<b>Average Annual Benefit</b> (excluding one-off)		£ n/a			
<b>Average Annual Benefit</b> (excluding one-off)						
£ n/a						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Total Benefit (PV)</b></td> <td style="padding: 5px;">£n/a</td> </tr> </table>		<b>Total Benefit (PV)</b>	£n/a			
<b>Total Benefit (PV)</b>	£n/a					
Other <b>key non-monetised benefits</b> by 'main affected groups' Reduction of risk and harm from terrorist attack for crowded places whose owners choose to protect them. Fringe benefits in terms of streetscape and crime reduction for crowded places whose owners choose to protect them.						

### Key Assumptions/Sensitivities/Risks

The National Counter-Terrorism Security Office risk assessment costs & enforcement costs are business as usual. Strong sensitivity to take-up rates in non-legislation options - risks around legalities and assignment of responsibility which may skew take-up rates.

Price Base Year 2008	Time Period Years 10	<b>Net Benefit Range (NPV)</b> £	<b>NET BENEFIT (NPV Best estimate)</b> £
-------------------------	-------------------------	-------------------------------------	---

What is the geographic coverage of the policy/option?	England, Scotland, Wales, and Northern Ireland as appropriate			
On what date will the policy be implemented?	March 2010			
Which organisation(s) will enforce the policy?	Voluntary/NaCTSO			
What is the total annual cost of enforcement for these	£ n/a			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	N/A			
What is the value of the proposed offsetting measure per year?	£ n/a			
What is the value of changes in greenhouse gas emissions?	£ n/a			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)	
Increase of	£ n/a	Decrease of	£ n/a
<b>Net Impact</b>		£ n/a	



## Summary: Analysis & Evidence

**Policy Option:**  
**Option 2**

Description: Two guidance documents to be published: one by the Home Office on good practice for local partners on how best to protect crowded places; and another by the Home Office and third parties on suitable protective security measures for new and retro fit developments that is outside the planning framework.

<b>COSTS</b>	<b>ANNUAL COSTS</b>		Description and scale of <b>key monetised costs</b> by 'main affected groups' Costs of implementing risk reduction measures (public sector for Local Authority owned spaces, private sector for others). One-off for retro-fits; ongoing for process changes/new-build going forward. Staff training. Costs of reading and adopting planning guidance.	
	<b>One-off</b> (Transition)	<b>Yrs</b>		
	£10s of millions *			
	<b>Average Annual Cost</b> (excluding one-off)			
	£millions *		<b>Total Cost (PV)</b>	£10s of millions *
Other <b>key non-monetised costs</b> by 'main affected groups'				
Opportunity costs for use of space. Reduction in public confidence. Impact on the economy in the short term. * ORDER OF MAGNITUDE ONLY				

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>		Description and scale of <b>key monetised benefits</b> by 'main affected groups'	
	<b>One-off</b>	<b>Yrs</b>		
	£			
	<b>Average Annual Benefit</b> (excluding one-off)			
	£10s of millions **		<b>Total Benefit (PV)</b>	£100s of millions **
Other <b>key non-monetised benefits</b> by 'main affected groups'				
Risk reduction from terrorist attack - both probability and impact - ongoing. Fringe benefits for utility of public spaces; public perception of security; crime reduction effects. ** ORDER OF MAGNITUDE ONLY & PER ATTACK OVER NEXT 10 YEARS				

### Key Assumptions/Sensitivities/Risks

The National Counter-Terrorism Security Office risk assessment costs & enforcement costs are business as usual. Strong sensitivity to take-up rates in non-legislation options - risks around legalities and assignment of responsibility which may skew take-up rates.

Price Base Year 2008	Time Period Years 10	Net Benefit Range (NPV) £10s to £100s of millions **	NET BENEFIT (NPV Best estimate) £10s of millions **
-------------------------	-------------------------	---	--

What is the geographic coverage of the policy/option?		England, Scotland, Wales, and Northern Ireland as appropriate			
On what date will the policy be implemented?		March 2010			
Which organisation(s) will enforce the policy?		Voluntary/NaCTSO			
What is the total annual cost of enforcement for these		£ n/a			
Does enforcement comply with Hampton principles?		Yes			
Will implementation go beyond minimum EU requirements?		N/A			
What is the value of the proposed offsetting measure per year?		£ n/a			
What is the value of changes in greenhouse gas emissions?		£ n/a			
Will the proposal have a significant impact on competition?		No			
Annual cost (£-£) per organisation (excluding one-off)		Micro	Small	Medium	Large
Are any of these organisations exempt?		No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)			
Increase of	£ n/a	Decrease of	£ n/a	<b>Net Impact</b>	£ n/a

## Summary: Analysis & Evidence

<b>Policy Option: Option 3</b>	<b>Description:</b> Three guidance documents to be published: one by the Home Office on good practice for local partners on how best to protect crowded places; another by the Home Office and the Department for Communities and Local Government aimed at planners; and one by the Home Office and third parties aimed at architects and designers
------------------------------------	--

<b>COSTS</b>	<b>ANNUAL COSTS</b>		Description and scale of <b>key monetised costs</b> by 'main affected groups' Costs of implementing risk reduction measures (public sector for Local Authority owned spaces, private sector for others). One-off for retro-fits; ongoing for process changes/new-build going forward. Staff training. Costs of reading and adopting planning guidance.
	<b>One-off</b> (Transition)	<b>Yrs</b>	
	£10s of millions *		
	<b>Average Annual Cost</b> (excluding one-off)		
	£millions *		
<b>Total Cost (PV)</b>			£10s of millions *
Other <b>key non-monetised costs</b> by 'main affected groups' Opportunity costs for use of spaces. Reduction in public confidence. Impact on the economy in the short term. * ORDER OF MAGNITUDE ONLY			

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>		Description and scale of <b>key monetised benefits</b> by 'main affected groups'
	<b>One-off</b>	<b>Yrs</b>	
	£		
	<b>Average Annual Benefit</b> (excluding one-off)		
	£10s of millions **		
<b>Total Benefit (PV)</b>			£100s of millions **
Other <b>key non-monetised benefits</b> by 'main affected groups' Risk reduction from terrorist attack - both probability and impact - ongoing. Fringe benefits for utility of public spaces; public perception of security; crime reduction effects. ** ORDER OF MAGNITUDE ONLY & PER ATTACK OVER NEXT 10 YEARS			

<b>Key Assumptions/Sensitivities/Risks</b>
The National Counter-Terrorism Security Office risk assessment costs & enforcement costs are business as usual. Strong sensitivity to take-up rates in non-legislation options - risks around legalities and assignment of responsibility which may skew take-up rates.

Price Base Year 2008	Time Period Years 10	<b>Net Benefit Range (NPV)</b> £10s to 100s of millions **	<b>NET BENEFIT (NPV Best estimate)</b> £10s of millions **
-------------------------	-------------------------	---	---

What is the geographic coverage of the policy/option?		England, Scotland, Wales, and Northern Ireland as appropriate		
On what date will the policy be implemented?		March 2010		
Which organisation(s) will enforce the policy?		Voluntary/NaCTSO		
What is the total annual cost of enforcement for these		£ n/a		
Does enforcement comply with Hampton principles?		Yes		
Will implementation go beyond minimum EU requirements?		N/A		
What is the value of the proposed offsetting measure per year?		£ n/a		
What is the value of changes in greenhouse gas emissions?		£ n/a		
Will the proposal have a significant impact on competition?		No		
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)			(Increase - Decrease)
Increase of	£ n/a	Decrease of	£ n/a
<b>Net Impact</b>		£ n/a	

## Summary: Analysis & Evidence

<b>Policy Option: Option 4</b>	<b>Description: Legislate, enforcing suitable security measures for the highest-risk buildings</b>
--------------------------------	--

<b>COSTS</b>	<b>ANNUAL COSTS</b>	Description and scale of <b>key monetised costs</b> by 'main affected groups'. Costs of implementing risk reduction measures (public sector for Local Authority owned spaces, private sector for others). One-off for retro-fits; ongoing for process changes/new-build going forward. Staff training. Costs of reading and adopting planning guidance.				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>One-off</b> (Transition)</td> <td style="width: 30%; text-align: center; padding: 5px;"><b>Yrs</b></td> </tr> <tr> <td style="padding: 5px;">£100s of millions *</td> <td></td> </tr> </table>		<b>One-off</b> (Transition)	<b>Yrs</b>	£100s of millions *	
	<b>One-off</b> (Transition)		<b>Yrs</b>			
	£100s of millions *					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Average Annual Cost</b> (excluding one-off)</td> <td></td> </tr> <tr> <td style="padding: 5px;">£millions *</td> <td></td> </tr> </table>	<b>Average Annual Cost</b> (excluding one-off)		£millions *			
<b>Average Annual Cost</b> (excluding one-off)						
£millions *						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Total Cost (PV)</b></td> <td style="padding: 5px;">£100s of millions *</td> </tr> </table>		<b>Total Cost (PV)</b>	£100s of millions *			
<b>Total Cost (PV)</b>	£100s of millions *					
Other <b>key non-monetised costs</b> by 'main affected groups' Opportunity costs for use of spaces. Reduction in public confidence. Impact on the economy in the short term. * ORDER OF MAGNITUDE ONLY						

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>	Description and scale of <b>key monetised benefits</b> by 'main affected groups'.				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>One-off</b></td> <td style="width: 30%; text-align: center; padding: 5px;"><b>Yrs</b></td> </tr> <tr> <td style="padding: 5px;">£</td> <td></td> </tr> </table>		<b>One-off</b>	<b>Yrs</b>	£	
	<b>One-off</b>		<b>Yrs</b>			
	£					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Average Annual Benefit</b> (excluding one-off)</td> <td></td> </tr> <tr> <td style="padding: 5px;">£10s of millions **</td> <td></td> </tr> </table>	<b>Average Annual Benefit</b> (excluding one-off)		£10s of millions **			
<b>Average Annual Benefit</b> (excluding one-off)						
£10s of millions **						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%; padding: 5px;"><b>Total Benefit (PV)</b></td> <td style="padding: 5px;">£100s of millions **</td> </tr> </table>		<b>Total Benefit (PV)</b>	£100s of millions **			
<b>Total Benefit (PV)</b>	£100s of millions **					
Other <b>key non-monetised benefits</b> by 'main affected groups'. Risk reduction from terrorist attack - both probability and impact - ongoing. Fringe benefits for utility of public spaces; public perception of security; crime reduction effects. ** ORDER OF MAGNITUDE ONLY & PER ATTACK OVER NEXT 10 YEARS						

### Key Assumptions/Sensitivities/Risks

The National Counter-Terrorism Security Office risk assessment costs & enforcement costs are business as usual. Strong sensitivity to take-up rates in non-legislation options - risks around legalities and assignment of responsibility which may skew take-up rates.

Price Base Year 2008	Time Period Years 10	<b>Net Benefit Range (NPV)</b> £-10s to -100s of millions**	<b>NET BENEFIT (NPV Best estimate)</b> £-100s of millions**
-------------------------	-------------------------	--	--

What is the geographic coverage of the policy/option?	England, Scotland, Wales, and Northern Ireland as appropriate			
On what date will the policy be implemented?	March 2010			
Which organisation(s) will enforce the policy?	Voluntary/NaCTSO			
What is the total annual cost of enforcement for these	£ n/a			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	N/A			
What is the value of the proposed offsetting measure per year?	£ n/a			
What is the value of changes in greenhouse gas emissions?	£ n/a			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)				(Increase - Decrease)
Increase of	£ n/a	Decrease of	£ n/a	<b>Net Impact</b> £ n/a

# Evidence Base (for summary sheets)

## Background

The UK currently faces a high level of threat from international terrorism, and an attack could take place without warning<sup>1</sup>. Crowded places remain the preferred target for international terrorists and the most likely target for an attack is a crowded place which is easily accessible, regularly available and offers the prospect for an impact beyond loss of life alone.

## Rationale

In the face of this threat, we must learn from experience and gain a greater understanding about how attacks might be carried out and how we can work to mitigate their impact. On 25 July 2007 the Prime Minister asked Lord West (Home Office Parliamentary Under-Secretary of State for Security and Counter-Terrorism) to review how best to protect crowded places (and transport infrastructure and critical national infrastructure) from terrorist attack.

The results of the review were announced by the Prime Minister on 14 November 2007 (with further detail given in the Home Secretary's Written Ministerial Statement on the same date).

The written ministerial statement can be found at:

<http://www.publications.parliament.uk/pa/cm200708/cmhansrd/cm071114/wmstext/71114>. The review itself has not been published for security reasons.

The review showed that a substantial amount of work had been undertaken or was underway to increase levels of protective security, but that more was needed to turn available advice into action on the ground. A key finding of the review was the importance of engaging with a wide range of local partners, in particular local authorities and local businesses, to implement counter-terrorism protective security advice and allow them to make rational decisions on protective security measures.

The review also highlighted that individuals and businesses must be free to carry on normal social, economic and democratic activities and, as a result, there will always be some vulnerability to terrorist attack. Protective security measures must be proportionate to the risk and one of the main purposes of this policy is to ensure that effort is directed to those areas where the counter-terrorism benefits will be the greatest. The Government wants to reduce the vulnerability of crowded places at highest risk and these guidance documents will help make real progress in delivering a sustained and continuous reduction in vulnerability over the next few years where it is most needed.

Without the proposed policy intervention, users of crowded places will continue to be placed at risk, and new construction will not be able to take advantage of the much reduced costs of building in security measures at an early stage.

There is a substantial probability of an attack within the next 10 years, which would have costs in the following categories:

- Loss of life – which would have impacts similar to those of loss of life in other crimes.
- Serious injury – which again would have impacts similar to those expected for injuries caused by other crimes.
- Slight injury.
- Costs of damage to property – costs would be considerable.

---

<sup>1</sup> At the time of writing, the threat level to the UK is assessed as “Severe” meaning that a terrorist attack is highly likely.

- Public confidence – a terrorist attack will naturally tend to increase fear of another one and constitutes a genuine cost to a large proportion of the population. On the other hand, a clear reduction in impact of an attack as a result of protective measures, or an attack which is publicly seen to fail as a result of protective measures, would increase public confidence and tend to reduce this fear.
- Short-term economic effects – the economic literature suggests that a terrorist attack has a real, though usually short-lived effect on the productivity of a country and in particular upon the behaviour of its stock exchanges. It is difficult to estimate the magnitude of this effect, in part because it would depend strongly on the precise location of any attack.

## Policy objectives

The objectives of the policy are:

- to increase the perceived difficulty of a terrorist attack in crowded places and thus discourage possible attackers; and
- to reduce the impact of any attack, which would have an additional benefit in that this would also discourage possible attackers.

To achieve this we plan:

- to issue guidance;
- to work with the National Counter-Terrorism Security Office and Counter-Terrorism Security Advisers to identify those crowded places which are at highest risk;
- to work with local partnerships to reduce risk in those crowded places which are at highest risk;
- to ensure a proportionate approach such that crowded places at low risk do not incur unnecessary costs; and
- to encourage designing-in of high-quality protective security measures, both for retro-fit to existing sites and especially for new builds.

## Options

1. Do nothing – allow owners and operators of crowded places to continue as before, and manage the risk as they see fit.
2.
  - (i) Home Office publish guidance on good practice for local partners on how best to protect crowded places; and
  - (ii) Home Office and third parties publish guidance on suitable protective security measures for new and retrofit developments. As advice outside the planning framework, local planning authorities would not be required to have regard to it, although it may be considered material by a decision taker.
3.
  - (i) Home Office publish guidance on good practice for local partners on how best to protect crowded places; and
  - (ii) Home Office and Department for Communities and Local Government publish joint supplementary guidance to the "*Safer Places: The Planning System and Crime Prevention*" aimed at planners. Under planning law, local planning authorities must have regard to the guidance and it would support delivery of the existing requirement under section 17 of the Crime and Disorder Act 1998 for local authorities to give due regard to crime (which includes terrorism) in the exercise of its functions; and
  - (iii) Home Office and third parties publish guidance aimed at architects and designers on suitable protective security measures for new and retrofit development.

#### 4. Legislate, enforcing suitable security measures for the highest risk buildings.

In all cases, it may be possible to introduce a fiscal incentive such as a reduction in VAT to encourage take-up of measures.

### **Appraisal**

The four options below will have very similar types of costs and benefits – for example, all will generate benefits if a terrorist attack is prevented or contained by security measures in crowded places. In addition, all will have costs associated with the provision of those security measures. The main difference between the options is the take-up rate for different types of protection, which means that the costs of providing security measures for each option will vary, as will the extent of the benefits generated.

#### ***Option 1: Do nothing – allow owners and operators of crowded places to continue as before, and accept the risk***

If no further action is taken on top of that which is currently planned or ongoing, crowded places will continue to be at particular risk from terrorist attack. In the absence of any intervention by Government, some owners or operators of crowded places may nevertheless choose to protect them and this would result in a reduction in the risk and impact of an attack for those crowded places, which in turn would result in a small reduction in the overall risk and impact of an attack.

#### *Costs*

Some of the costs that will arise in the absence of Government intervention include:

- Costs of retrofitting for new builds if other policy options are implemented in the future – for example a policy response in the aftermath of an attack. The fact that the cost of fitting measures in a new build is substantially less than the cost of retrofitting the same measures at a later date means that if we do not take action for new builds now there is a risk that we will have to incur substantial additional costs in the future.
- Physical protective measures for both new builds and retrofits - there is evidence that most security and facility managers for large and medium-sized businesses are considering protective security measures, though fewer believe that their businesses are at high risk and a good proportion perceive impediments to implementing such measures. Under the “do-nothing” option the take-up rate of protective security measures by employers is assumed to be relatively low.
- Staff training - a small proportion of building operators would apply measures such as staff training without government intervention. An example is Project Argus, a training exercise currently being run by the National Counter-Terrorism Security Office, which aims to provide businesses with valuable counter-terrorism advice.

#### *Benefits*

- Under the do-nothing option, owners and operators of crowded places would continue to make their own decisions as to the proper level of protection against terrorist attack, and would not incur additional costs unless they felt it was necessary. Implementing security measures where they did feel it to be necessary would, for these buildings, reduce both the risk of an incident and also the impact of any incident that might occur.
- We estimate that a small proportion of operators of buildings at high risk would apply measures such as staff training without government intervention. For these buildings this would reduce both the risk of an incident and the impact of any incident that might occur.

**Option 2: Two guidance documents to be published: one by the Home Office on good practice for local partners on how best to protect crowded places, and another by the Home Office and third parties on suitable protective security measures for new and retrofit developments that is outside the planning framework.**

Under this option two guidance documents would be published. The first document “*Working Together to Protect Crowded Places*”, to be published by the Home Office, is intended to help local partners to understand the role they can play in incorporating counter-terrorist security advice into their existing work to improve community safety. The other document, on suitable protective measures for new and retrofit developments, will be published by the Home Office and third parties. As advice outside the planning framework local authorities would not be required to have regard to it, however it may be considered material by a decision taker.

It is expected that the take-up rates of protective security measures under this option will be higher than for option 1, and hence that the costs of those measures, and their associated benefits, will also be higher, as described below.

### **Costs**

- Costs of retrofitting for new builds if other policy options are taken up in the future – for example in the aftermath of an attack.
- Retrofit costs of physical measures, other than as a result of a policy change - here we assume that with the guidance more owners and operators would be aware of possible suitable measures and would take up the option to retrofit suitable measures.
- New build costs of physical measures – again, we assume that the guidance would encourage the taking of suitable measures and hence increase the take-up rate for new-builds.
- Staff training – we believe that more building operators would apply measures such as staff training if it were advised in the guidance.
- Process costs - some recommendations require the introduction of additional security processes. These will introduce recurrent costs both for owners and operators of crowded places and possibly for their suppliers or customers. In addition, some venues, especially larger entertainment venues, may experience reduced flow rates through key bottlenecks, and may therefore see reduced profits.
- Opportunity costs resulting from trade-offs between these measures and other safety, accessibility or environmental measures – given limited resources and multiple competing demands at the planning stage, businesses and planning officers will need to make trade-offs between protection against terrorism and other benefits. These include:
  - Accessibility for disabled people;
  - Access for emergency services;
  - Environmental measures;
- Normalisation of security measures and associated costs to privacy – as protective security measures become more common, they will become more normalised, and the public will accept them more readily. It can be argued that this may have an impact on public acceptance of measures affecting privacy.
- Costs of reading and using the guidance.

### **Benefits**

- Reduction in probability of a terrorist attack, either through deterrence or because protective measures were effective. A reduction in probability would increase the estimated benefits

proportionately. The higher take-up rates under this option are expected to increase the level of benefit obtained.

- Deterrence of a more significant or more damaging attack in favour of a less damaging one. Proportionality is a strong theme within the guidance, and measures adopted should be directed towards reducing the most significant attacks.
- Reduction in impact of a terrorist attack, in terms of loss of life, injury, or damage to property. Here the higher take-up rate will increase the impact over option 1.
- Reduction in impact of a terrorist attack in terms of public confidence – if an attack occurs and protective measures as advised in the guidance are seen to have reduced its impact or prevented it from being successful this will help to reduce the fear induced by the attack. In some cases it is also possible to publicise examples where terrorists have been deterred from making an attack by the existence of counter-measures as advised by the government.
- Fringe benefits in terms of streetscape or usability of a building – in many cases, and especially for new builds, it is possible to design effective protective security measures which are also useful or attractive, at negligible additional cost. An example of this is early consideration at the concept design stage of the use of planters, seating or art features specifically designed and strengthened to offer resistance from terrorist vehicle attack. These can be as effective as bollards, which can be considered unattractive and imposing.
- Fringe benefits in terms of crime reduction – some protective security measures such as staff training or additional surveillance are also effective in this role.
- Increased public confidence in their security when visiting the relevant sites, as long as suitable measures are well-implemented. If not, there may be a cost in public confidence.

***Option 3: Three guidance documents to be published: one by the Home Office on good practice for local partners on how best to protect crowded places; another by the Home Office and the Department for Communities and Local Government aimed at planners; and one by the Home Office and third parties aimed at architects and designers***

Under this option three guidance documents would be published. “*Working Together to Protect Crowded Places*”, to be published by the Home Office, is intended to help local partners to understand the role they can play in incorporating protective security advice into their existing work to improve community safety. Another document, ‘*Crowded Places: The Planning System and Counter-Terrorism*’ would be a joint publication by the Home Office and Department for Communities and Local Government and will provide supplementary guidance to the “*Safer Places: The Planning System and Crime Prevention*” aimed at planners. Under planning law, local planning authorities must have regard to the guidance and it would support delivery of the existing requirement under section 17 of the Crime and Disorder Act 1998 for local authorities to give due regard crime (which includes terrorism) in the exercise of its functions. A third document would be published by the Home Office and third parties aimed at architects and designers on suitable protective security measures for new and retrofit development.

Consideration of the guidance would be required at an early stage in the same way as Disability Discrimination Act 2005 duties and Fire Regulations. This will help the owners make better decisions between the competing priorities they face.

The types of costs and benefits for this option are likely to be similar to those for publishing guidance. We expect that the non-monetised benefits will be a greater proportion of all benefits than is the case in option 2. In this option take-up rates of protective security measures for new builds will be higher in the early years compared to option 2, and take-up rates for retrofits will be slightly lower in later years compared to option 2. This is because this option aims to increase take-up rates for new builds by drawing attention to the possibilities for introducing protective security measures at an early stage. The cost of fitting measures in a new build is substantially less than the cost of retrofitting the same measures at a later date, and therefore it is expected that the cost of this option would be less than option 2 in the long term.



## Costs

In addition to the costs listed in option 2 there will be some additional process costs as Local Planning Authorities are required to include protective security measures explicitly in their planning assessment processes. However, liaison with police Architectural Liaison Officers/Counter Terrorism Security Advisers is within the Local Planning Authorities' existing stakeholder groups and expert reporting will be provided at no charge by the National Counter Terrorism Security Office as part of their remit, so the main cost will be additional staff time in considering these issues in a proportionate manner for some Local Planning Authorities.

## Benefits

- Reduction in probability of a terrorist attack, either through deterrence or because protective measures were effective. Again, a reduction in probability would increase the estimated benefits proportionately. Under this option, we expect the increase in benefits to rise more rapidly over time than under the previous options, as take-up rates for new builds will be higher.
- Deterrence of a more significant or more damaging attack in favour of a less damaging one – there may be some additional benefit over option 2 in terms of the newest high-profile buildings (which may be especially attractive targets) but this is likely to be small.
- Reduction in impact of a terrorist attack, in terms of loss of life, injury, or damage to property. This effect is expected to be similar to that achieved under option 2.
- Reduction in impact of a terrorist attack in terms of public confidence – as described in option 2.
- Fringe benefits in terms of streetscape or usability of a building – in many cases, and especially for the new builds which are emphasised under this option, it is possible to design effective proactive security measures which are also useful or attractive, at negligible additional cost. Ensuring consideration of protective measures at the design and planning stage is likely to increase the attention given to such fringe benefits by architects, planners and engineers, and to accelerate the development of novel additional uses of protective elements.
- Fringe benefits in terms of crime reduction – as described in option 2.

## ***Option 4: Legislate, enforcing suitable security measures for the highest-risk buildings***

Under this option legislation will be enacted to require owners or operators of crowded places at highest risk to implement suitable security measures. The types of costs and benefits are similar to those described in option 3. As above, the main change in this option is to the take-up rates of protective security measures and this will have an impact on the cost of the option. Due to the increased take-up rate and the additional costs listed below, we expect the cost of this option to be significantly higher than the other options. A light-touch regulatory scheme in parallel with similar areas of concern such as fire safety would be enacted.

## *Additional costs*

There may be some take-up from lower-risk buildings, adding to the costs.

There will also be additional enforcement costs.

If businesses are required to incur these substantial costs, there may well be short-term displacement effects away from other areas of building design such as crime prevention, accessibility or environmental protection.

## **Summary**

In summary, option 1 would maintain the status quo; options 2 and 3 are clearly viable; and the cost of option 4 is substantially higher than for options 1, 2 and 3. Option 4 is deemed to be

significantly less cost effective than the other options. Option 3 delivers a greater proportion of non-monetised benefits and is expected to cost less in the long term, compared to option 2. Thus, given the information available to us at present, we believe that option 3 is the most appropriate option.

A brief viability impact assessment has been carried out, which suggests a reduction in viability of around 1-2% for most types of sites, but a reduction of around 10% for nightclubs and public houses. This effect applies equally to town centres and to out-of-town developments; assuming planning guidance is applied proportionately, as we would expect, there is no evidence of a disproportionate effect in town centres.

Version 7.2. February 2010

## Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

**Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.**

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	No
Small Firms Impact Test	No	No
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	Yes
Disability Equality	No	Yes
Gender Equality	No	Yes
Human Rights	No	No
Rural Proofing	No	No

## Annexes



