

**From:**  
**Sent:** 28 April 2023 10:37  
**To:** Planning Planning  
**Subject:** DOCO comment ATM 35 Great Russell Street Bloomsbury  
**Attachments:** Great Russell Street 35 ATM v.1.docx

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Good morning,

Please find attached the planning comment for the proposed ATM at 35 Great Russell Street. If you or the applicant has any questions in regards to my comments or recommendations then please do not hesitate to get in touch

Kind regards

Aran



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Fast Track TC  
Regeneration and Planning

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London N1C 4NG

Your ref: 2023/1294/P  
Our ref: NW 7396

Good afternoon,

Thank you for allowing me to comment on the proposed application for the  
**Installation of ATM 35 Great Russell Street London Camden WC1B 3PP**

I have not had any meetings with the applicant or their agent regarding this proposal.

The proposed site falls within the policing ward of Bloomsbury. The top reported crimes for the month of February 2023 (taken from the police.UK website) were other theft, theft from person, antisocial behaviour and violence and sexual offences. This ward has one of the highest crime rates within London. The crime types are indicative for an area with a large footfall common with tourists.

There are numerous other ATM's within a short distance of this location. A map has been included in the appendix to illustrate this fact.

The location is on an active shop parade. During the day this activity will provide decent natural surveillance but when the shops close this will obviously diminish. The ATM is slightly recessed due to the architectural design of the buildings. This can provide a possible concealment opportunity and can assist in people loitering in order to commit distraction thefts where the pin number and bank card can be taken. The British museum is a short distance away and this draws offenders into the area to commit theft from the high number of visitors to the area. With the reduction in cash usage and the amount of ATM's within a short walk, is this required?

Please refer to Appendix A for illustration of crime figures and local as well as national planning policy

**I object to the proposal but if permission is granted I strongly recommend the following to mitigate the risk of theft, distraction offences at this location:**

I recommend the following for any new installation/or existing ATM

- CCTV coverage of the ATM. (consider colour rendering index min >60Ra). A formal, overt CCTV system should be installed and maintained by a member company of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB). Any such company will install a system to the British Standard. Images should be retained for a minimum of 30 days. This system would need to be registered with the Information Commissioner's Office, as it would be recording public areas. Appropriate signage indicating this fact needs to be displayed.
- Lighting to the BS5489:2020 from additional or existing lighting. Please see additional information below.
- Mirrored Surface to allow the ATM user to see behind them.
- Anchor System to secure the ATM to the ground.
- Pin guards to the ATM.
- Privacy Markings on the pavement.
- The provision of a secure enclosed room behind the machines for maintenance and to provide the ATM replenisher with a private space, separated from the public, where they can reload the cash cassettes at the most vulnerable point of the process. The walls should be able to resist a physical attack i.e. plywood lined with plasterboard and should be a minimum of 2.1M high, but ideally from floor to ceiling depending upon the associated risk as determined by the DOCO. The opening must be sufficient for an operative to enter freely and replenish with the door closed behind them. If the opening comprises of two doors the slave door should be secured with a deadbolt and not with a manual slave bolt/s. The locking system that allows egress in an emergency (i.e. a thumb turn override) must meet BS EN 1125:1997 Building Hardware and BS EN 179:1998 (Emergency) release test standard.

Should this application be successful, the type of lighting around this structure will be an important factor in reducing crime, reducing the fear of crime and apprehending suspects should a crime occur. Therefore I would make the following recommendations that are regarded as crime reduction "good practice" in relation to lighting.

#### **ATM Lighting:-**

- 200-300 Lux is recommended for ATM keyboard illumination.
- 50 Lux is suggested as the minimum ambient illumination at floor level up to a distance of 1 metre from the face of the ATM and extending 75 cm either side of the mid-point of the ATM.

- This is also the minimum level recommended should a CCTV camera be fitted. 200 Lux ambient illumination at floor level should be considered in areas deemed to pose a higher risk to customers at night. (Consider colour rendering index min>60Ra)

Additional security measures and practices may well be required and will depend on existing local premises security and any risk assessment carried out prior to site selection and installation.

The advice I have provided has been taken from the following guides:

[https://www.securedbydesign.com/images/downloads/HOMES\\_BROCHURE\\_2019\\_update\\_May.pdf](https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf)

[https://www.securedbydesign.com/images/downloads/SBD\\_Commercial\\_2015\\_V2.pdf](https://www.securedbydesign.com/images/downloads/SBD_Commercial_2015_V2.pdf)

The advice has been adjusted taking into consideration crime statistics and analysis of the area.

Kind regards

Aran

## Appendix A

Camden planning response template – NPPF and Camden local plan references

### **Section 17 of the Crime and Disorder Act 1988**

“It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it’s area”, as clarified by PINS953.

The NPPF and Camden’s own local guidance can support this proposal:

Section 91 of the NPPF states:

*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”*

Section 127 of the NPPF further adds:

*Planning policies and decisions should ensure that developments..*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience .....*”

Taken from the Camden Supplementary Guide to Design (January 2021 revision)

- *The Council requires that developments demonstrate that they have been designed to contribute to community safety and security.*
- *Security features must be fully considered and incorporated at an early stage in the design process.*
- *Designing-against crime features, safe access and security measures must complement other design considerations and be considered as part of a holistic approach to designing and maintaining safer environments for all.*
- *Better designed environments support safer and healthier communities.*
- *Consideration will be given to the impact of measures on the surrounding area to ensure that there is not displacement of activity into surrounding neighbourhoods.*
- *Safer environments support healthier communities.*

In accordance with Local Plan Policy C5 Safety and Security, the Council will require applicants to demonstrate that all impacts of their proposal on crime and community safety have been considered and addressed. Applicants should be able to demonstrate that they have consulted Met Police Designing Out Crime Officer (details of which can be found at [www.securedbydesign.com](http://www.securedbydesign.com)) and that proposals take into account the advice given and achieve Secured by Design certification, where appropriate.

### **Policy C5 Safety and security (From the Camden Local Plan)**

*The Council will aim to make Camden a safer place. We will:*

- (a) work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- (b) Require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- (c) Require appropriate security and community safety measures in buildings, spaces and the transport system;*
- (d) Promote safer streets and public areas;*
- (e) Address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design; and*
- (f) Promote the development of pedestrian friendly spaces.*

*We strongly encourage security features to be incorporated into a scheme from the beginning of the design process and complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in our supplementary planning document Camden Planning Guidance on design.*

*It is important to take a proactive approach at an early stage to reduce risks and opportunities for crime and ASB to occur, rather than relying on reactive measures such as*

*CCTV, which should only be used as part of a package of measures to reduce crime. Incorporating designing out crime features into a development should complement other key design considerations and high quality architecture and design should still be achieved.*

*Considering good design early in the design process will lead to a better quality development overall.*

*The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would*

encourage antisocial behaviour. The use of the site and layout should also be carefully considered as these can also have a major impact on community safety.

From the Camden local plan;

*“Camden’s food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be assessed in line with our town centre policies, particularly Policy TC4 Town centre uses and Policy A1 Managing the impact of development. The Council will also take into consideration any concerns raised from stakeholders within adjoining areas beyond Camden’s boundaries. Alcohol related crime and late night disorder have been identified as significant issues, particularly within Camden Town and the Seven Dials area of Central*

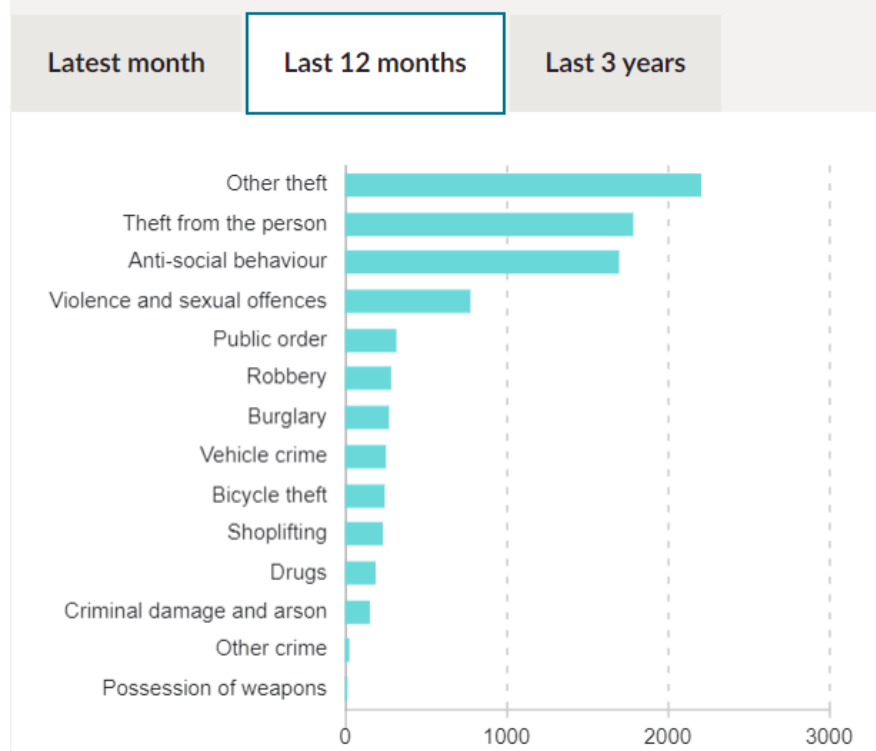
*London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”*



Line graph showing the rates of crime for Bloomsbury ward over the last twelve (12) months

## Crime types description

for the last 12 months (from Mar 2022 to Feb 2023)

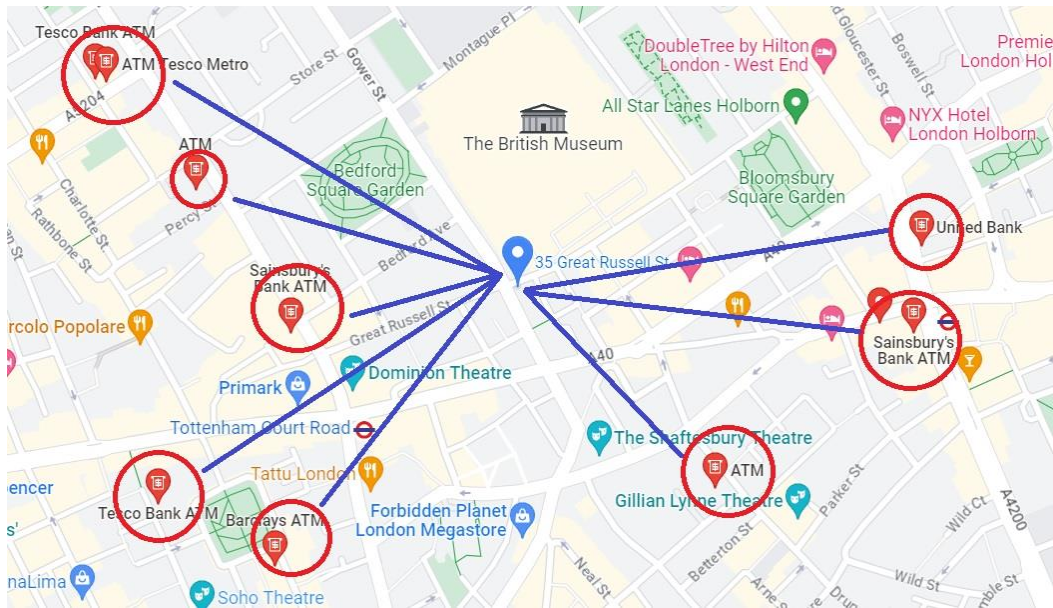


Bar chart indicating the types of recorded crimes over the last twelve months on Bloomsbury ward

Anti-social behaviour	1705	20%
Bicycle theft	251	2.9%
Burglary	278	3.3%
Criminal damage and arson	159	1.9%
Drugs	195	2.3%
Other theft	2214	25.9%
Possession of weapons	20	0.2%
Public order	324	3.8%
Robbery	291	3.4%
Shoplifting	240	2.8%
Theft from the person	1793	21%
Vehicle crime	259	3%
Violence and sexual	783	9.2%

Number of crimes on Holborn and Bloomsbury Ward over the last twelve (12) months





*Map indicating ATM locations within walking distance of the proposed site.*

### **The primary objective of an efficient Police Service is the prevention of crime**

Crime Prevention advice can be found on the Metropolitan Police Service Website –

<http://content.met.police.uk/site/crimeprevention>

(Crime figures obtained from [www.police.uk](http://www.police.uk) and are as most recent as available)

*‘Crime prevention advice is given freely without the intention of creating a contract. Neither does the Metropolitan Police Service take any legal responsibility for the advice given. You must abide by the fire and safety regulations and if you are in any doubt consult the Fire Prevention Officer and the Council’s Building Control Officers.’*