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Your ref:
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Dear Mr Overy,

Thank you for your enquiry for secured by design and allowing me to comment on the **proposed refurbishment of the existing building, new cladding, three storey rear extension and rear winter gardens, and two-storey extension above with front and rear balconies, cycle storage in undercroft storage, new planters, all to provide a total of five self-contained flats.** The proposed address for this development is 155 Drummond Street, London, NW 1 2PB.

This site falls within the London borough of Camden and the policing ward of Regents Park. The top reported crimes for the month of September 2022 (taken from the police UK website) are violence and sexual offences, other theft, antisocial behaviour and theft from person.

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

I have had a meeting with the planning officer during the planning phase.

I have no objections to this development but have the following comments and recommendations to make:

- I recommend that the front entrance door from Drummond Street be security rated and certificated to LPS 1175 Issue 8 SR2 or STS 202 BR2. I recommend encrypted key fob as a form of access control. If maglocks are the preferred locking mechanism then it is recommended that the door be secured with two (2) maglocks integral to the frame and positioned one (1) third from the top and one (1) third from the bottom of the frame. This is also recommended for the lift lobby door.
- Audio and video intercom at the location so residents can suitably vet visitors and other persons seeking entry. This should be for the main entrance on Drummond Street and also the main entrance door leading into the lift lobby area.
- It is recommended that the lift be key fob activated to establish a secure airlock which will mitigate against tailgating leading to opportunistic crime.

- Avoid green break glass if possible but if required then it is recommended that they be placed behind a plastic cowl which needs to be lifted to activate the switch,
- All residential front doors to be security rated and certificated to PAS24:2016 or PAS24:2022. A spyhole is required for each door and this needs to be part of the tested and certificated door set that is installed. It cannot be fitted retrospectively as this could compromise the security rating of the door. No letterboxes are required within the door set as the post will be delivered to mailboxes within the lift lobby.
- If any balcony's or windows are accessible from the public realm then it is recommended that these also be security rated to PAS 24 2016 or 2022.
- Mail boxes to be security rated to DHTS 009. If this cannot be achieved then it is recommended that the area be covered by CCTV, be of robust construction. The individual letter boxes shall have a maximum aperture size of 260mm x 40mm, have anti fishing properties, have fire resistance and be installed in accordance with the manufacturer's specification.
- A secure parcel locker is also recommended as mail theft has seen a significant increase over the last few years. Especially from communal entrance lobby's for residential flats.
- The cycle storage is problematic. I have found a company that provides a security rated door set which is slide to open. Sunray doors have either solid door or louvered doors to LPS 1175 Issue 7 SR2 and 3. There may be other companies that offer a similar product. I recommend the security rating of LPS 1175 Issue 7 SR3 for cycle storage which is externally accessed. I have spoken with this company and the only locking mechanism is key operated. As this development is only five (5) residential units then this should be achievable.
- The cycle racks should allow for three (3) points of locking. The racks should be either set into the floor or wall so that no fixings are exposed that could provide a vulnerability.
- The lighting along the pedestrian thoroughfare needs to be uniform so that there are no pockets of darkness which could be used for possible concealment. External lighting should conform to BS 5489-1 2020. The lighting should be LED and housed in a robust casing which will mitigate against the risk of criminal damage. The area is dark and so it should be taken into consideration the time that lights are activated. Usually a dusk till dawn system is recommended but in this scenario 24 hour lighting may be better suited.
- CCTV with complimentary lighting to be considered for the exterior/entrance and communal areas (internal). 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.
- Consider convex mirrors to enable pedestrians to have vision around corners within this route. Visibility lowers the fear of crime.
- The planting that is intended to soften the border between the vehicular access and the pedestrian thoroughfare needs to not provide a seating opportunity. Ground (or as close to) level bedding would be recommended. Consider defensive planting for this location to reduce the risk of illicit items being stored.
- Anti-graffiti treatment for exposed walls on the ground floor.
- Fire drop keys if required should not be accessible to the general public. It is recommended that these be placed three (3) metres above ground. Drop keys are easily and very cheaply purchased and offer a vulnerability to any secure door set. It is recommended that access control boxes are used for emergency egress, The products are supplied by a company called Gerda. The London Fire Brigade have access to these keys and so ease of access should not be compromised. The ACB should be security rated to LPS 1175.

Further consultation is required in the pursuit of achieving SBD certification for the development. If yourself or the applicant wishes to discuss any of my recommendations further then please feel free to contact me. 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/SBD_Commercial_2015_V2.pdf

The advice has been adjusted taking into consideration crime statistics and analysis of the area. Further consultation is required in the pursuit of achieving SBD certification for the development.

Kind regards

Aran

Further to the above. With the current condition on the development which states, **"You are required to obtain Secured by Design Accreditation, prior to commencement of works, excluding demolition and site clearance. To ensure that the development mitigates the risk of burglary and antisocial behaviour in accordance with policy C5 of the London Borough of Camden Local Plan 2017."** This condition is impossible to achieve under its current wording. Accreditation is not awarded until a site visit has been conducted by the DOCO once the development has been completed to check that all recommendations have been implemented.

If all recommendations have been implemented on this development then it should achieve SBD accreditation. However this is not a certificate/accreditation or a letter of comfort to discharge a condition. A site visit is still required on completion of the build.

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) 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

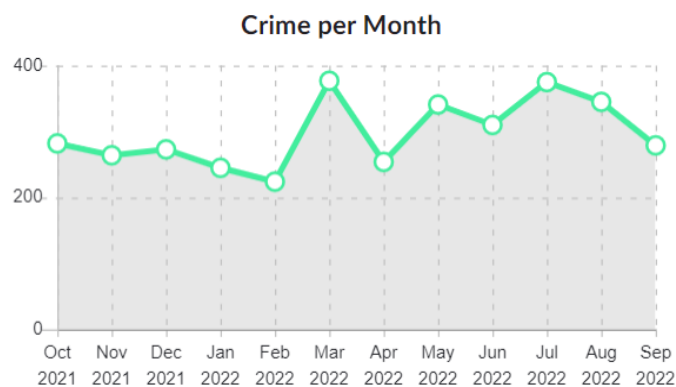
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”

Crime levels overview

for the last 12 months (from Oct 2021 to Sep 2022)

Last 12 months

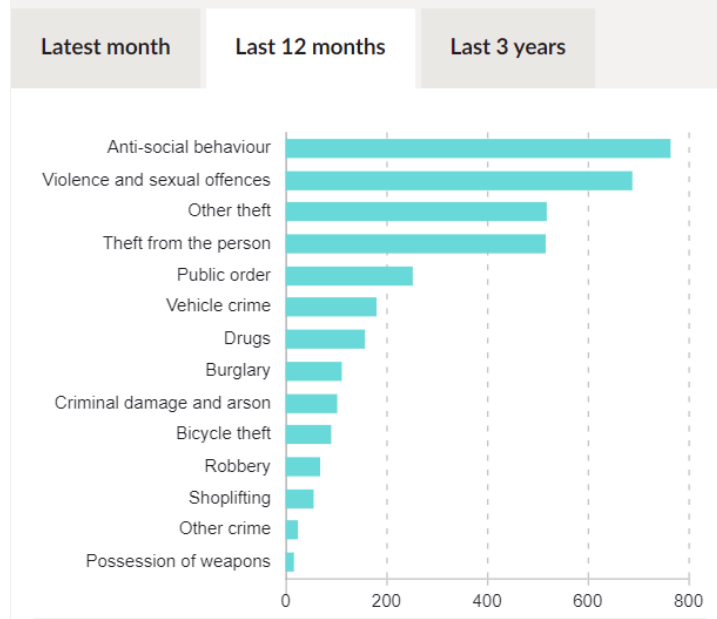
Last 3 years



Line graph showing the number of crimes over the last twelve months for Regents Park ward.

Crime types description

for the last 12 months (from Oct 2021 to Sep 2022)



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

| Type | Total | Percentage |
|------------------------------|-------|------------|
| Anti-social behaviour | 766 | 21.5% |
| Bicycle theft | 92 | 2.6% |
| Burglary | 113 | 3.2% |
| Criminal damage and arson | 104 | 2.9% |
| Drugs | 159 | 4.5% |
| Other theft | 520 | 14.6% |
| Possession of weapons | 18 | 0.5% |
| Public order | 254 | 7.1% |
| Robbery | 70 | 2% |
| Shoplifting | 57 | 1.6% |
| Theft from the person | 518 | 14.5% |
| Vehicle crime | 182 | 5.1% |
| Violence and sexual offences | 690 | 19.3% |

Number of crimes on Regents Park ward over the last twelve (12) months

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 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.'