



Kristina Smith

Design Out Crime Office

Your ref: 2023/1804/P
Our ref: NW 7301
(18/05/2023)

Good afternoon,

Thank you for allowing me to comment on the proposed **erection of a 7 and 4 storey building at Plots A and F (respectively) following demolition of existing buildings and structures; erection of roof extensions at Plots B, E, I and J; external refurbishment of the existing buildings at Plots C and D; erection of replacement entrance pavilion; plus cycle parking and plant provision; hard and soft landscaping to provide an additional c.16,000sqm (GIA) of Class E (g) floor space and ancillary uses at Highgate Studios, 53-79 Highgate Road, London NW5 1TL**

This proposal is within the London borough of Camden in the policing ward of Kentish Town North. The top recorded crimes for the Month of March 2023 (taken from the Police.uk website) are violence and sexual offences, antisocial behaviour, criminal damage and shoplifting. Other offences of note for this area are vehicle crime, other theft and burglary

Please refer to the appendix for illustrations of crime figures and an overview of relevant local and national planning policy.

I have had a previous meeting with the security consultant in relation to this project but have not had any meetings with architects or the direct applicant.

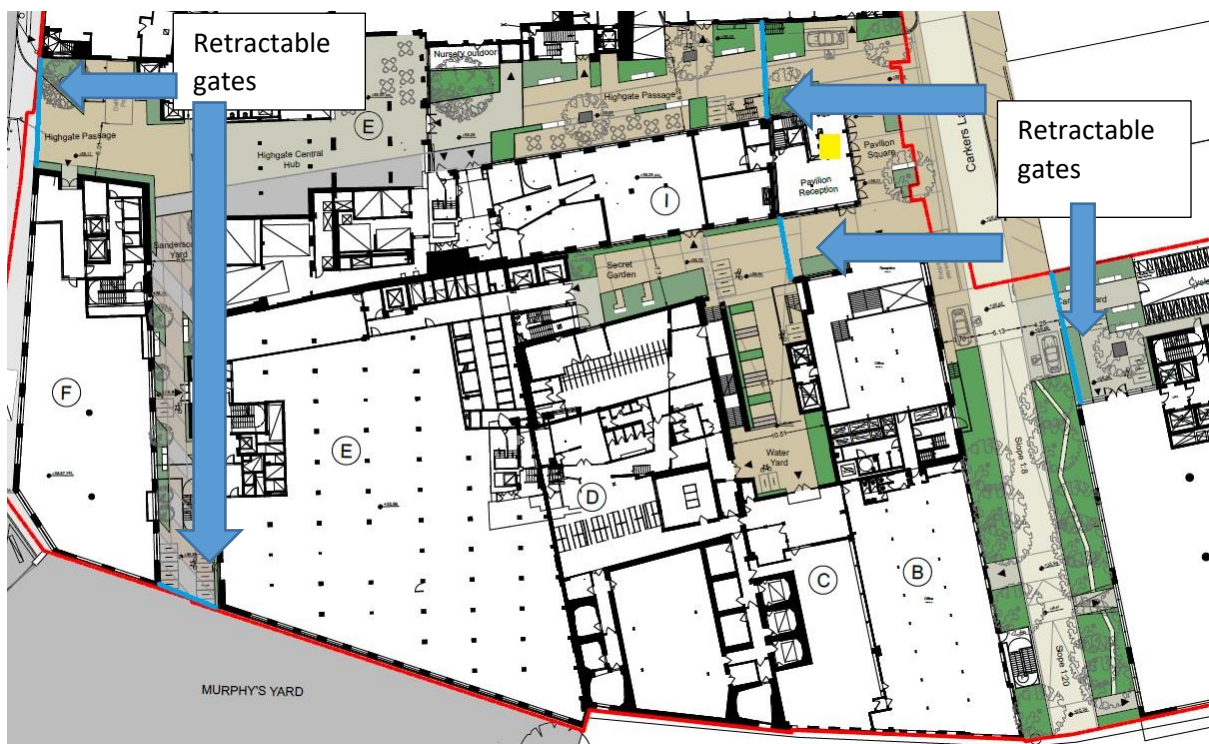
I object to the proposal in its current form.

In regards to the project I have the following concerns and recommendations to make:

Looking at the localised crime map some of the issues have been from the neighbouring estate. These problems could overspill into this proposed development.

I do have some concerns and recommendations for the site which I have highlighted below:

- The opening up of the site and increasing the permeability might be advantageous during the day when the businesses are open. There will be legitimate activity and good footfall around the area. The concern is when the businesses are closed and legitimate activity reduces. There are numerous opportunities for concealment around the site. If seating is a permanent feature and removed to a secure location when the premises close then this could lead to loitering and an increase in antisocial behaviour.
- I question the amount of routes through the site (especially overnight) as it does not seem to save any time off of a journey/cut through due to their close proximity with one another.
- The security cabin which is very visible when people enter the site from Carkers Close is going to be removed. Although the proposal is to have a security presence, if they are not on view this could provide the impression of no capable guardian. The proposed security room could be a solution during the day but in the evenings/overnight it is recommended that the security sit in a prominent position which can be viewed (such as the glazed reception lobby).
- Security I would imagine will reduce overnight and the securing of the site will assist the person's role. It is recommended that parts of the buildings that can be secured have intruder alarms and routes that can be gated overnight to reduce the publically accessible footprint are strongly advised. This will improve sight lines and reduce the opportunities for concealment. The Murphy's Yard development which would have access routes either side of this site has not been accepted at planning at this time and it could be some time before the site completes. With nowhere to draw people away from the site it is felt that creating a concealed area away from the police patrols along Highgate Lane will attract higher levels of ASB and crime.



The yellow marker on the above drawing indicates the proposed location of the night shift security guard. This would be in a visual position within the glazed reception area. There would still need to be a live feed for the CCTV camera system at this position.

- It is strongly recommended that the ground floor have security rated/certificated products to mitigate the risk of crimes such as burglary and criminal damage. Cycle theft is still at a high level and access to this store should be through a door certificated to LPS 1175 Issue 8 C5 (SR3/4) or STS 202 BR3/4 if it is the single door or LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2 if already behind a secure line.
- Glazed sections of the building (reception area) to have glazing enhanced to BSEN 356 2000 P4A.
- Entrance doors sets to be certificated to either LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2.
- Lighting must be at levels recommended by BS 5489-1:2020 and be uniform so that no pockets of darkness are generated which could lead to concealment opportunities. Visibility lowers the fear of crime.
- Seating to be modular and segregated with arm rests to make individual seats. Any tables and chairs attached to food and beverage businesses to be removed overnight or secure them in such a way as to prevent them from being opportunities for congregating or climbing to reach higher levels of the buildings.
- External staircases (where it permits under fire/emergency egress strategy) to be secure. If this cannot be achieved then CCTV with complimentary lighting for these areas and bolstering of the secure line accessible from the stairs (If not handle of locking furniture on the public facing façade) then PAS24:2016 or 2022 or LPS 2081 SRB are possible options. If the doors are for egress only in an emergency then they should be alarmed and notify security when activated.
- Visitor cycle stands to be positioned in the place which will have the most natural surveillance, legitimate activity and footfall. London stands are preferred to Sheffield stands as they have a tapping bar running between the two (2) posts. The user can then place the bicycle lock above the tapping bar so that it cannot be moved to the ground and simply smashed with a blunt object. The stand needs to be set into the wall or floor so that there are no bolts/fixings exposed to provide a vulnerability. The metal tubing can also be filled with concrete or other aggregate to increase the weight and robustness of the frame.

Other considerations

- 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 could/would be recording public areas. Appropriate signage indicating this fact needs to be displayed.
- With the lack of activity and natural surveillance (out of core office hours) it is strongly recommended that an intruder alarm be installed. Intruder alarms need to be compliant with PD 6662 scheme for the application of European standards for intruder and hold up alarms. Installers need to be members of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB) and fitted to BS 50131.

I strongly recommend that the following conditions be placed upon this development.

1. Prior to construction proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and local planning office.

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/HOMES_GUIDE_2023_web.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

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.”

Top reported crimes

Most commonly reported crimes during Mar 2023

Violence and sexual offences	21
Anti-social behaviour	14
Criminal damage and arson	6
Shoplifting	6

Top reported crimes for March 2023 (taken from Police UK website)

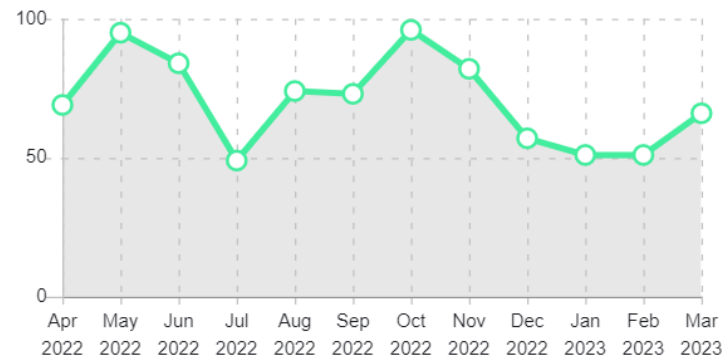
Crime levels overview

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

Last 12 months

Last 3 years

Crime per Month



Crime levels over the past twelve (12) months (taken from Police UK website). From this illustration it can be seen that reported crimes within the ward are on the increase.

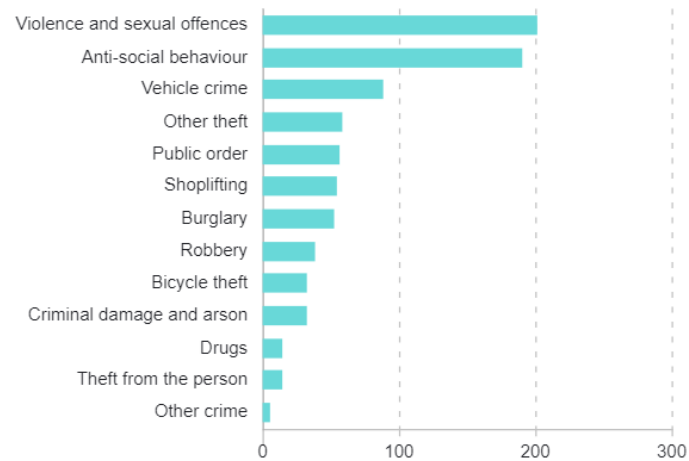
Crime types description

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

Latest month

Last 12 months

Last 3 years



Crimes by description over the past twelve (12) months (taken from the Police UK website)

Type	Total	Percentage
Anti-social behaviour	191	22.6%
Bicycle theft	33	3.9%
Burglary	53	6.3%
Criminal damage and arson	33	3.9%
Drugs	15	1.8%
Other theft	59	7%
Public order	57	6.7%
Shoplifting	55	6.5%
Theft from the person	15	1.8%
Vehicle crime	89	10.5%
Violence and sexual offences	202	23.8%
Other crime	6	0.7%
Robbery	39	4.6%

Volume of crimes on the ward over the last twelve (12) months (taken from the Police UK website)

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.’