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Design Out Crime Office
North West DOCO Office,
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www.met.police.uk
Your ref: 2023/3808/P
Our ref: NW7592
(06/10/2023)

Good afternoon,

Thank you for allowing me to comment on the proposed **change of use of existing British Transport Police station and offices (Sui Generis) to Offices within (Class E)**, including removal of basement car parking, ramp and vehicle dock; extensions at first, second, third and fourth floors to provide additional office (Class E) floorspace; new replacement façades at Whitfield Street and Tottenham Court Road elevations; partial new replacement facades at north and south elevations; rooftop plant equipment, PV panels and green roof; external amenity areas at first, second, third and fourth floors; and associated external alterations at 55 Tottenham Court Road & 16-24 Whitfield Street, London W1T 2EL & W1T 2RA.

This proposal is within the London borough of Camden in the policing ward of Bloomsbury. The top recorded crimes for the Month of July 2023 (taken from the Police.uk website) are other theft, antisocial behaviour, theft from the person and violence and sexual offences. Other offences of note for this area are public order, robbery 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 no previous meetings with the applicant or architect in relation to this project.

I do not object to the proposal but have the following comments and recommendations to make:

- This area does have a large street population. The location of the site is a small distance away from the American church which offers a warm place and a soup kitchen for the homeless. Heal and Son's is also a well-known area for outreach worker to attend. The area outside the shop (recessed windows) become occupied every early evening and when these are taken up individuals and groups spiral out from this location to find a sheltered place for

the night. This can have an effect on an area. Whereas I am not suggesting any form of hostile architecture the elimination of recessed areas should strongly be considered.

- The frontage on Tottenham Court road has a path leading to other buildings. It must be noted that this area does not have the best natural surveillance. This is evident with the graffiti on the walls. Can this area be controlled or is this outside of the scope of this application? The controlling of this area would be of benefit and lower the risk of antisocial behaviour and crime from occurring in this particular location. I would be happy to offer advice on security ratings for gates and boundary fences if this area should be cordoned off to the general public.
- Whitfield Street does not have the best in natural surveillance. This is displayed in the internal retractable window security grilles on display in neighbouring buildings.
- It is strongly recommended that security rated products be installed into this development. Main entrance door set should be certificated to either LPS 2081 SRB, LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2.
- Windows on the ground floor and first floor (if accessible from the public realm) should be security rated to PAS24:2022. Look to an enhanced glazing if curtain walling is being sought. The glazing should be certificated to BSEN 356 2000 P2A (minimum) up to P4A (recommended). If there are any conservation issues consider secondary glazing certificated to PAS24:2022 or internal retractable grilles to LPS 1175 SR2 or STS 202 BR2.
- If the building is to have multiple tenants then consideration needs to be given to implementing compartmentation. This can be achieved through access control and encrypted key fobs. It is recommended that the doors which have access control systems installed be security rated to PAS24:2022.
- Emergency egress and the positioning of green break glass should not permit a potential intruder further access into a building. There should also be no way of bypassing security via access to the bin store or cycle store. This again can be mitigated with effective access control.
- The relocation of the murals should again be carefully considered. The placement either on the exterior façade of Whitfield Street or within the opposite park space will not be as well observed as that of Tottenham Court Road. It is strongly recommended that the murals are protected with an anti-graffiti treatment or housed behind an easy to clean screen.

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

[COMMERCIAL_GUIDE_2023_web.pdf \(securedbydesign.com\)](https://www.securedbydesign.com/images/COMMERCIAL_GUIDE_2023_web.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 Jul 2023	
Other theft	235
Anti-social behaviour	176
Theft from the person	168
Violence and sexual offences	85

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

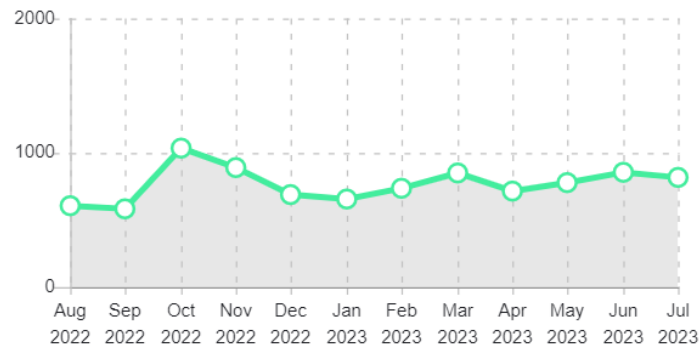
Crime levels overview

for the last 12 months (from Aug 2022 to Jul 2023)

Last 12 months

Last 3 years

Crime per Month



Crime levels over the past twelve (12) months (taken from Police UK website).

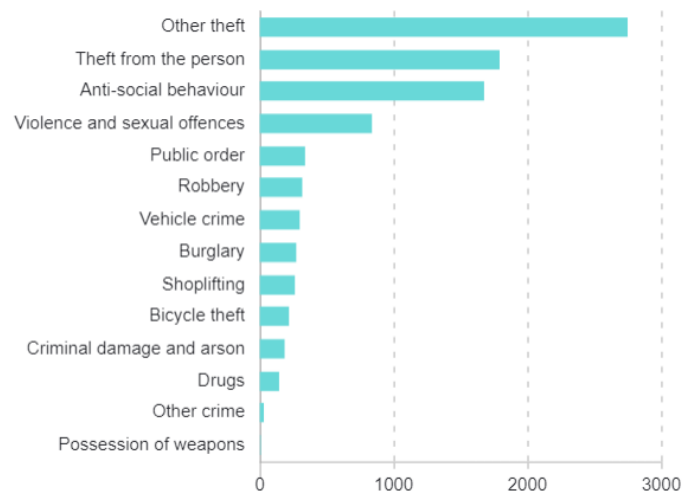
Crime types description

for the last 12 months (from Aug 2022 to Jul 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	1682	18.3%
Bicycle theft	224	2.4%
Burglary	278	3%
Criminal damage and arson	191	2.1%
Drugs	150	1.6%
Other theft	2755	29.9%
Possession of weapons	13	0.1%
Public order	344	3.7%
Robbery	323	3.5%
Shoplifting	268	2.9%
Theft from the person	1798	19.5%
Vehicle crime	304	3.3%
Violence and sexual offences	844	9.2%

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.’