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www.met.police.uk
Your ref: 2023/3419/P
Our ref: NW 7559
(12/10/2023)

Good afternoon,

Thank you for allowing me to comment on the proposed **refurbishment and extension of existing office building (Class E) at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.**

This proposal is within the London borough of Camden in the policing ward of Holborn and Covent Garden. The top recorded crimes for the Month of August 2023 (taken from the Police.uk website) are other theft, theft from the person, antisocial behaviour and violence and sexual offences. Other offences of note for this area are public order, vehicle crime and burglary.

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

My colleagues have had a single meeting with the security consultants back in February 2023 but there has been no further interactions. 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:

- 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.
- Previously there was mention of a residential aspect. The main communal entrance to be certificated to LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2. All residential unit front doors to be rated to PAS24:2022 (triple certificated for security, fire and smoke). Mailboxes (if within a lobby area) to be certificated to TS 009.

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 Aug 2023

Other theft	147
Theft from the person	121
Anti-social behaviour	104
Violence and sexual offences	57

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

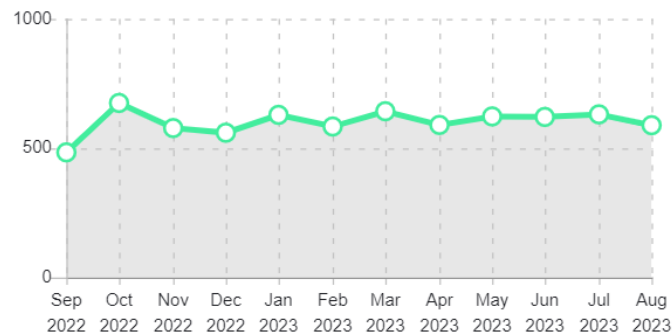
Crime levels overview

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

Last 12 months

Last 3 years

Crime per Month



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

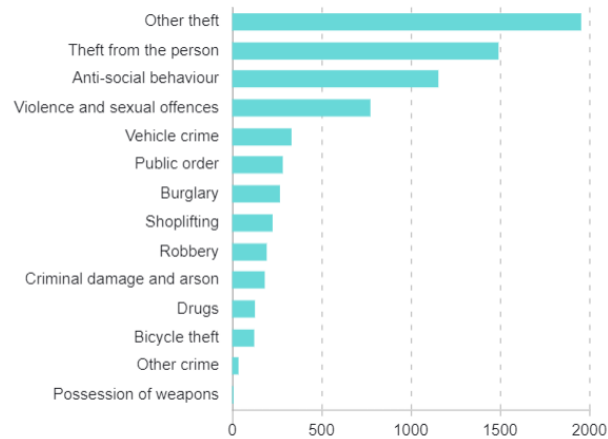
Crime types description

for the last 12 months (from Sep 2022 to Aug 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	1159	16.1%
Bicycle theft	127	1.8%
Burglary	271	3.8%
Criminal damage and arson	186	2.6%
Drugs	131	1.8%
Other theft	1959	27.2%
Possession of weapons	11	0.2%
Public order	287	4%
Robbery	197	2.7%
Shoplifting	230	3.2%
Theft from the person	1496	20.8%
Vehicle crime	336	4.7%
Violence and sexual offences	778	10.8%

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.’