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Design Out Crime Office
North West DOCO Office,
Ruislip Police Station,
The Oaks,
Ruislip,
HA4 7LE
Your ref: 2023/4241/P
Our ref: NW 7638
(19/10/2023)

Good afternoon,

Thank you for allowing me to comment on the **proposed erection of six-storey building providing 14 flats and associated works (for consultation 5 x 1 beds, 4 x 2 beds, 5 x 3 beds) at 31 Daleham Gardens London NW3 5BU.**

The site falls within the policing ward of Belsize. The top reported crimes for this ward for the month of August 2023 (taken from the police UK website) are antisocial behaviour, other theft, vehicle crime and violence and sexual offences. Other crimes of note within this area are theft from the person and burglary.

I have had no previous contact in regards to this development from the client or architect.

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

I object to the proposal in its current form for the reasons listed below. I also have the following comments and recommendations:

- The design and access statement makes reference to using Secured by Design principles but does not go into detail how this has affected the overall design. PAS24 is the only mentioned security rating and this is the base standard for any proposed new build. I would like to know the height of the boundary wall at the front of the development that separates the site from the public realm. This leafy front garden area with proposed trees will create ample concealment opportunity for potential intruders as this area falls outside of the private residential garden behind a 'secure' gate. A low level border should not exceed 1.2 metres in height, if greater height is required then a visually permeable railing or roll top metal fence

could be utilised. Tree canopy should not fall under 2.5 metres to ensure levels of surveillance are not compromised.

- There is no proposed security rating for the 'secure' gate which provides access to the private gardens for residents only. This gate also provides access to the main communal entrance.
- There is no proposed security rating for the front door communal entrance. It is orientated away from the street and due to changes in ground height is again obscured. It has very poor natural surveillance and would require a higher security rating than PAS24. A minimum recommendation would be certification to either LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2. This security rating would also be the minimum for the proposed 'secure' gate.
- There appears to be no gate to secure access to the lower ground level on the other side of the building where windows can be accessed. Again due to the change in height of the ground and the orientation means that surveillance over these areas will be less making the windows/doors in this area vulnerable.
- The bin store does provide concealment opportunities as the front garden area is in effect open to the public. This can increase the risk of antisocial behaviour. It is recommended that the bin store be secured with a certificated door to either LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2.
- The neighbouring wall can be scaled and reduce the effectiveness of the 'secure' gate and boundary to the private garden areas. The access from neighbours cannot be controlled so mitigations will be required such as defensive planting, possible hostile toppings and/or increasing the security rating of products (windows and doors) that can be accessed from this area.
- The mail strategy is not clear and it appears that the current plan would be to post direct to each individual door as opposed to a mail lobby area on ground floor. Confirmation of this would be useful. If the mailboxes are to be external or within a lobby area then I recommend mailboxes to achieve TS009 certification
- PAS24: 2022 windows and doors and patio doors for the ground and if accessible the first floor. Window restrictors should also be considered. The residential unit with balcony space next to the communal balcony requires certified windows and patio doors to PAS24: 2022 as they potentially be accessed via the communal terrace. There is mention of a louvered section next to the windows. If this can provide access (if forced) then it is strongly recommended that they be security rated.
- PAS24: 2022 front doors for internally accessed residential units. It is recommended that these be triple certificated for security, fire and smoke. Spy holes to be part of the door set up.
- Rule setting can have an effect in crime reduction. Consider signage indicating the fact that CCTV is in operation in this area.
- CCTV with complimentary lighting. 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.
- Fixings and existing structures such as drainpipes should not provide a climbing aid and made as flush to the building line as possible.

It is strongly recommended that this location have security rated products to mitigate against the risk of theft and other forms of acquisitive crime to provide some protection for residents that will be housed at this location.

I am happy to make recommendations for this development through further consultation with the applicant.

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

- 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.**
- 2. For the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development.**

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/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.

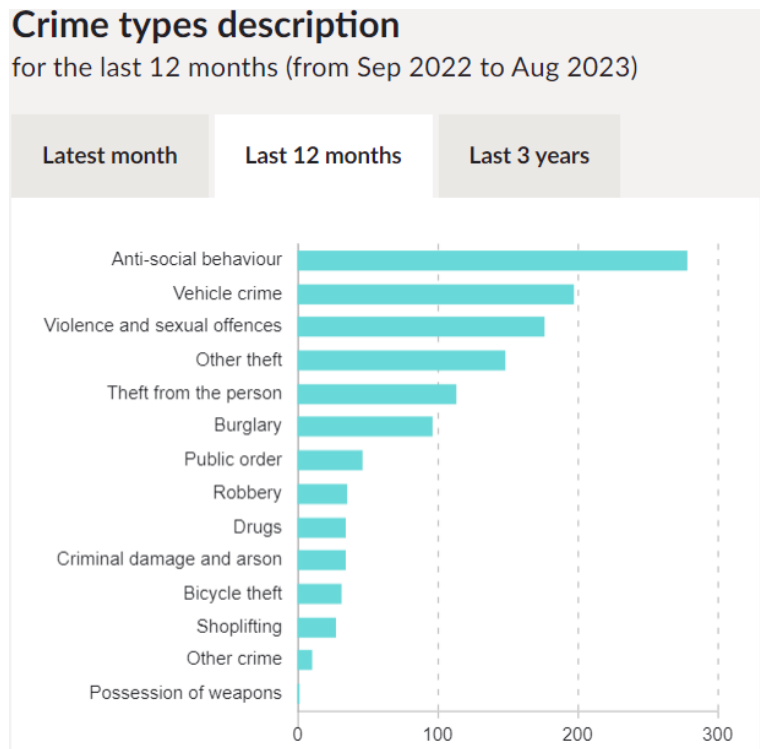
From the Camden local plan;

“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.”



Line graph showing the number of crimes over the last twelve (12) months for Belsize ward.



Bar chart indicating the types of recorded crimes over the last twelve (12) months on Belsize ward

Type	Total	Percentage
Anti-social behaviour	279	22.5%
Bicycle theft	32	2.6%
Burglary	97	7.8%
Drugs	35	2.8%
Other theft	149	12%
Public order	47	3.8%
Shoplifting	28	2.3%
Theft from the person	114	9.2%
Vehicle crime	198	16%
Violence and sexual offences	177	14.3%
Other crime	11	0.9%
Criminal damage and arson	35	2.8%
Robbery	36	2.9%

Number of crimes on Belsize 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.'