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Your ref: 2023/4648/P  
Our ref: NW 7695  
(15/12/2023)

Good afternoon,

**Thank you for allowing me to comment on the erection of a new energy centre incorporating maintenance support accommodation to internal West Road, new substation off Montague Street, all together with associated internal and external works, service runs, erection of plant, landscaping, and temporary works associated with construction following demolition of existing Energy Centre to internal West Road and removal of temporary buildings to the south of the existing energy centre on the internal West Road and to the north and east of the White Wing facing Montague Street.**

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

I have had no previous meetings in regards to this development from the architect or applicant.

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

**I do not object to the proposal but also have the following comments to make:**

- The main entrance to the energy centre from street level to be security rated to either LPS 1175 Issue 8 B3 SR2 or STS 202 BR2.
- Entrance to the substation from street level to be certificated to either LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2. Louvered door sets to this specification are widely available.
- Any glazing on the ground floor where a member of the public could reasonably access to be enhanced to have laminate glazing to BSEN 356 2000 P2A. Consider what previous secure

lines exist prior to reaching this boundary. A certificated window to PAS24:2020, LPS 1175 SR2 may be proportionate to mitigate risk.

- Any interconnecting doors from the main building to the new energy centre and/or substation need to be both robust and have restricted access. Dependant on lines of security prior to reaching this feature a door certificated to either PAS24:2022, LPS 2081 SRB, LPS 1175 SR2 or STS 202 BR2 should be considered commensurate to risk.
- There appears to be a undercroft area on the ground floor. It is recommended that this be secured from the junction with the building line. This would eliminate a possible concealment opportunity.
- Alarm systems to be in place to help protect the site, along with an access control strategy for maintenance staff to be able to deactivate electronic security measures as necessary. The control room, operated 24/7, will help to identify any alarm activations to achieve early detection. Magnetic contacts will be installed for gating to help identify any illegitimate access or intrusion
- 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.
- External lighting was mentioned to conform to BS 5489-1 2013. The latest iteration is BS 5489 -1 2020.

**It is strongly recommended that this location have security rated products to mitigate against the risk of theft and other forms of acquisitive crime.**

I am happy to make further recommendations for this development through 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/HOMES_GUIDE_2023_web.pdf)

[https://www.securedbydesign.com/images/COMMERCIAL\\_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](http://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*

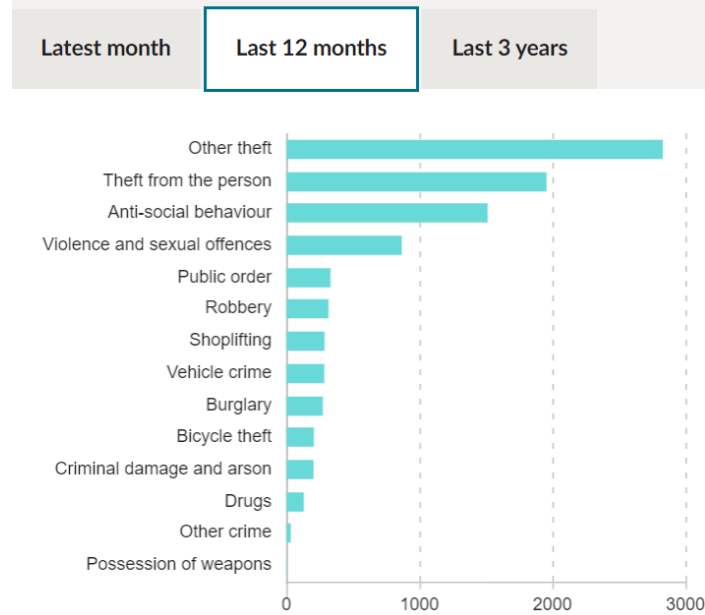
*London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”*



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

## Crime types description

for the last 12 months (from Nov 2022 to Oct 2023)



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

Anti-social behaviour	1518	16.3%
Bicycle theft	212	2.3%
Burglary	279	3%
Criminal damage and arson	209	2.2%
Drugs	136	1.5%
Other theft	2835	30.4%
Possession of weapons	12	0.1%
Public order	337	3.6%
Robbery	322	3.5%
Shoplifting	292	3.1%
Theft from the person	1961	21.1%
Vehicle crime	290	3.1%
Violence and sexual	873	9.4%

Number of crimes on Bloomsbury 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](http://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.'*