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www.met.police.uk
Your ref: 2023/5103/P
Our ref: NW 7795
(14/03/2024)

Good afternoon,

Thank you for allowing me to comment on the proposed **change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works.**

The development falls within the policing ward of Holborn and Covent Garden. The top reported crimes for the month of January 2024 (taken from the police UK website) were theft from the person, other theft, violence and sexual offences and antisocial behaviour. Other offences of note for this area include burglary, robbery, criminal damage and drugs.

Please refer to Appendix A for relevant crime figures and legislation.

I have not have any previous meetings with the applicant. **I do not object to the application but have the following comments and recommendations to make:**

Due to the fact that I am the Design Out Crime Officer covering Camden my comments will be focused around the High Holborn section of this development.

- It is important that the site is protected against illegitimate entry/intrusion, in order to help safeguard staff and members of the public. With a high number of people on the site at any one time, this is key to the security and integrity of the site. All emergency doors to be alarmed to alert security of an activation. It is also strongly recommended that any green break glass also be wired so that any activation will alert security or the management staff. If

they are not wired then consider locally alarmed cowls to mitigate against misuse of the green break glass system.

- The applicant makes reference to High Holborn being used as an entrance mainly for larger groups such as school visits and for access to the licenced bar area (once the attraction is closed).
- The main entrance is not directly on High Holborn but accessed via the side of the building. There is a small undercroft area at this location. Will this be the area used for queuing prior to entering the building? Will ownership of this area be accepted and controlled? With an undercroft area it can attract crime and antisocial behaviour. It is positive that the bar is not to be open during the attractions hours. It would not have been acceptable if school children were using the same entrance as customers for the bar.
- It is recommended that visitors are issued with a wrist-band, lanyard or other similar identification measure to allow staff/security to challenge a person not in receipt of any relevant identification whilst on site. This can be issued at the ticketing/security point.
- Security rated and certificated doors, windows and glazing are recommended for the façade and some areas within the venue. There were areas within the attraction which indicated that at some point (dependant on the exhibit or event that is taking place) temporary doors may have some form of access control. It is recommended that these doors be security rated/certificated. It is strongly recommended that the entrance doors into the tunnels from the High Holborn bar facility be security rated with access control and alarmed to prevent unauthorised access.
- The Location for the proposed short stay cycle parking needs to have excellent natural surveillance. London stands are preferred over the Sheffield style. They are essentially the same with the only difference being a tapping bar extending between the two (2) posts. The design intends for the user to secure locks above the bar so that the lock cannot be moved down onto the floor and smashed with a blunt object. The stand also needs to be set into the pavement/concrete so that no bolts/fixings are exposed. The tube of the stand can also be filled with concrete or other aggregate to add weight and overall robustness to the product.
- Although the frontage of High Holborn appears out of the scope for this development a couple of drawings within the design and access statement seemed to indicate possible cosmetic changes to doors and the façade. If this is the case I can advise/recommend doors and windows with a suitable security rating/certification.
- It is positive that the site will be covered by CCTV which will be monitored through a security room. Will this be managed/monitored 24 hours a day? Will there be an intruder alarm when the facility is closed to the public? This can then allow site security to initiate a response to a potential incident, whether this is something that they can deal with or require assistance from emergency services and so on at the earliest opportunity. CCTV monitoring at points of entry/egress and more vulnerable areas such as secure cycle parking and any areas of the site with higher value assets is recommended. CCTV and staff should ensure the safety of customers and fellow staff members. This can be achieved by lighting, increased sight lines to reduce the opportunities for concealment. Monitored formal surveillance. This will also assist to mitigate the risk of violence against women and girls (VAWG).

- There should be sufficient lighting and signage on site to help with wayfinding for staff/visitors and this should work effectively with the CCTV monitoring i.e. Not providing glare, dark spots and so on.
- It is recommended that CCTV is installed by a member company of either the National Security Inspectorate (NSI) or Security Systems and Alarms Inspection Board (SSAIB).
- An intruder alarm/motion detection is also recommended for the relevant structures on site, to notify security/central monitoring of any activation to a prohibited area, outside of operating hours, unguarded ingress/egress points and so on.
- It is also believed that the issue of coaches and school transport need to be further detailed. A drop off point is one thing but parking in and around these areas can put significant pressure on the local area. Arguments of space allocation and permissions can increase the risk of criminal damage and assault.

Although not currently legislation the venue will come under Martyn's Law. It would be prudent for the applicant to at least consider this and make plans before it is accepted into law. It is strongly recommended that advice be sought from the Counter Terrorist Security Advisor (CTSA) covering this area especially in relation to this.

If this application is successful I am happy to assist both the applicant and local planning authority with crime prevention advice and guidance.

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

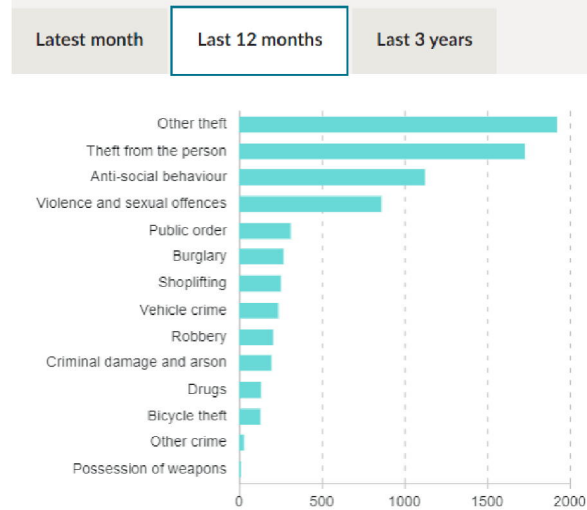
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”



Line graph showing the number of crimes over the last twelve (12) months for Holborn and Covent Garden ward.

Crime types description

for the last 12 months (from Feb 2023 to Jan 2024)



Bar chart indicating the types of recorded crimes over the last twelve (12) months on Holborn and Covent Garden ward

Type	Total	Percentage
Anti-social behaviour	1127	15.1%
Bicycle theft	132	1.8%
Burglary	272	3.6%
Criminal damage and arson	199	2.7%
Drugs	136	1.8%
Other theft	1926	25.8%
Public order	316	4.2%
Robbery	210	2.8%
Shoplifting	255	3.4%
Theft from the person	1733	23.2%
Vehicle crime	241	3.2%
Violence and sexual offences	865	11.6%
Other crime	33	0.4%
Possession of weapons	16	0.2%

Number of crimes on Holborn and Covent Garden 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.'