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Good afternoon,

Thank you for allowing me to comment on the proposed **replacement of Existing Phone box Earlham Street at the junction of Shaftesbury Avenue, London.**

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.

I have not have any previous meetings with the applicant.

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

I do not object to the replacement kiosk but have the following comments to make:

- This is a busy and active junction. There have been numerous thefts and robberies around this location. The crimes could not be attributed to the presence of the phone kiosk but the local crime pattern should be considered.
- I have reviewed the attached documents available on the online public portal. The design of the kiosk does not appear to have shelving or any ledge where items could be put. This is a good feature. There should be no charging docks around this location. A mobile phone on charge/display could be very attractive to the opportunistic thief.
- There appears to be a WIFI symbol on the design of the kiosk. If there is a proposal to have WIFI will this be free? How will misuse of this be monitored? Can this feature be deactivated if issues should arise or usage restricted? Can certain persons/devices be prevented from using this service?
- The proposed advertising screen maybe prone to criminal damage as this is a feature of the crime statistics for this policing ward. Will the installation have CCTV to record any abuse?

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.

Kind regards

Aran

Appendix A

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.

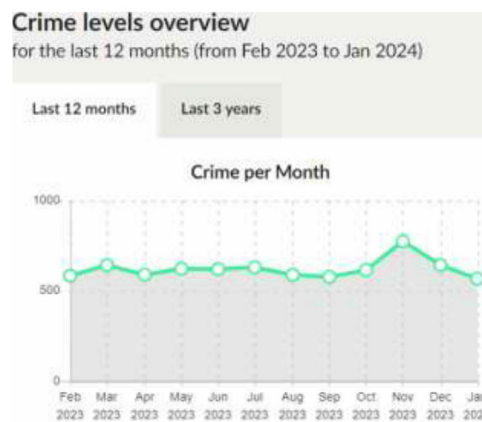
The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would

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.

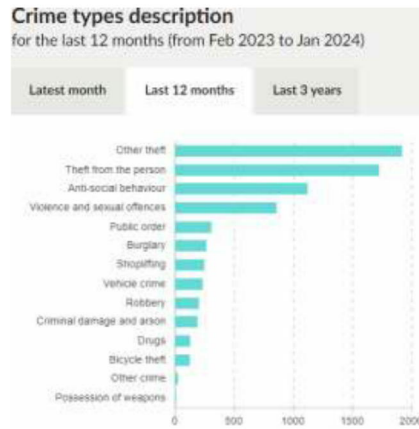
From the Camden local plan;

“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.



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 Camden Town 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.'