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Design Out Crime Office
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www.met.police.uk
Your ref: **2024/4887/P**
Our ref: **NW 8351**
(28/11/2024)

Good afternoon,

Thank you for allowing me to comment on the proposed redevelopment of **West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5.**

I have provided a scoping comment previously and have attached this to the response for reference.

The development falls within the policing ward of Gospel Oak.

The top reported crimes for the month of September 2024 (taken from the police UK website) were, violence and sexual offences, antisocial behaviour, burglary and vehicle crime. Other offences of note for this area include other theft, theft from the person, criminal damage and robbery

I have had previous meetings with the applicant. The comments and recommendations are from a crime reduction/prevention perspective only.

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

Whereas I do not object to the development the design and layout needs to be carefully considered.

The proposed location of the development lies to the South of Queens Crescent and is bordered to the East by Grafton Street and the West by Alcroft Road. The site extends to the edge of Athlone Street. It is a large and awkward site. Crime and anti-social behaviour are material considerations for this proposal, as seen from current crime figures

This location only a few streets away from Lismore Circus which has issues with gang activity, drugs and knife crime. I have conducted an environmental visual audit within the last two (2) years. This

area garnered local press attention a couple of years ago when the Mayor of London was present during a weapon sweep and two (2) zombie knives were discovered in close proximity to a children's play park. Ensuring the site has good natural surveillance and legitimate activity will be vital to ensure an antisocial element does not take hold. A secure by design condition can assist in supporting this.

For the general site as a whole recommend the following:

- Separation of public realm and residential will be key. There should be no areas of crossover that could lead to potential conflict. This site will be a very permeable site and it is imperative that the space be activated from ground floor to ensure it remains legitimate. This will provide good natural surveillance. Permeability in the form of footpaths needs to be considered carefully as 'leaky' developments (with secluded footpaths) can be a breeding ground for anti-social behaviour and crime. A multi-use common access route is preferred where there is vehicular movement, pedestrian traffic and cycle lanes. This enables a good level of vehicle use and footfall boosting the natural surveillance along key routes into the site. There should be no separate footpaths as these are often poorly overlooked and can be flash points for street crime including robbery type offences as well as sexual assault and other violent crime.
- Landscaping to provide clear access routes with excellent lines of sight. Visibility lowers the fear of crime. There should be no opportunities for concealment which could increase the risk of robbery, burglary and theft. Concealment also includes the stashing of weapons, drugs and other illicit items.
- Lighting will also be important within this development and externally should meet BS 5489-1 2020.

For the residential blocks I recommend:

- Security rated main entrance door sets to either LPS 1175 Issue 8 B3 (SR2) or STS 202 Issue 10 BR2.
- Secure lobby areas which incorporate a second door (leading from the main communal front entrance) to be certificated to either PAS24:2022 or LPS 2081 SRB.
- Compartmentation to be implemented on all residential blocks above fifteen (15) units or more
- Triple certificated front doors to the residential units to cover security (PAS24:2022), fire and smoke.
- Cycle and bin stores need to be secure and a security rating of either LPS 1175 Issue 8 B3 (SR2) or STS 202 Issue 10 BR2 is strongly recommended especially if externally accessed.

For commercial elements I recommend the following:

- I strongly recommend a roller shutter or retractable grille for this location certificated to LPS 1175 issue 8 B3 or STS 202 issue 10 BR2. Consider also anti-graffiti treatments for the facades.
- 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.

- 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. The 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. Burglary is a current priority for the ward and having the commercial units set up with an intruder alarm system is recommended. It is understood that these often come with subscription fees and this will need to be factored in by the potential tenant.

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.

The above are general security advice as there is currently little detail with this submission.

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

I 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.**

If this application is successful I am happy to assist both the applicant and local planning authority with crime prevention advice and guidance, where this assistance remains free of charge.

Further consultation is required in the pursuit of achieving SBD certification for the development is a requirement. 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%20GUIDE%20May%202024.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

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

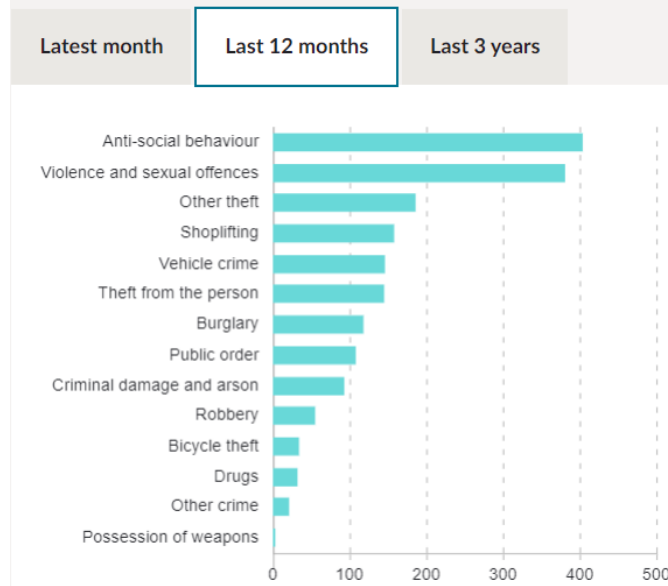
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”



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

Crime types description

for the last 12 months (from Oct 2023 to Sep 2024)



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

Type	Total	Percentage
Anti-social behaviour	405	21.3%
Bicycle theft	35	1.8%
Burglary	119	6.3%
Criminal damage and arson	94	5%
Drugs	33	1.7%
Other theft	187	9.9%
Public order	109	5.7%
Robbery	56	3%
Shoplifting	159	8.4%
Theft from the person	146	7.7%
Vehicle crime	147	7.7%
Violence and sexual offences	382	20.1%
Other crime	22	1.2%
Possession of weapons	4	0.2%

Number of crimes on Gospel Oak 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.'