



Edward Hodgson
Regeneration and Planning

London Borough of **Camden**,
Town Hall,
Judd Street,
WC1H 9JE

Design Out Crime Office
North West DOCO Office,

Our ref: NW8450
(07/02/2025)

Good afternoon,

Thank you for allowing me to comment on the **Part demolition, extension and reconfiguration of existing building, including enlargement of lower ground floor, erection of additional storey and new west wing and alterations to east elevation to provide replacement church (Class F1) with ancillary cafe and additional student accommodation (Sui Generis), together with associated plant, cycle and refuse storage (King's Cross Methodist Church, 58A Birkenhead Street, WC1H 8BW)**

The venue falls within the policing ward of King's Cross. The top reported crimes for the month of December 2024 (taken from the police UK website) were; other theft, theft from the person, violence and sexual offences and anti-social behaviour. Other offences of note were public order, shoplifting, burglary, criminal damage and arson.

I have had one meeting with the architect prior to the application being submitted. This is the first time commenting on this development.

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 have the following comments and recommendations to make:

- Currently the steps are given protection but if they are removed then there is a considerable seating opportunity for people to loiter. Design Out Crime Officer (D.O.C.O) have been requested to conduct numerous audits in the very local area due to high levels of antisocial behaviour and drugs issues including use and distribution. Consider the implementation of gates for the steps which are managed by staff. Gates closed when the church is closed and gates open when the church is open. Look at roll top to prevent the fence and gate also being used as a seating opportunity.

- Video and audio intercom access with data logging (more prudent for the resident access) should be employed at the location to suitably vet persons seeking entry at the earliest opportunity.
- A caretaker or other form of capable guardian should be on site 24/7. This can mitigate some risks of crime and ASB but physical security should not be compromised. Gold standard of security will help to future proof the development even if the management strategy changes.
- Clear rule setting needs to be present with no areas of crossover. Such as separate access for staff, residents (including visitors) and parishioner. Where there are multiple uses within a building they should be kept separate. Where interests compete for space then conflict can occur.
- Lobby area to be secure and ensure that there are no possible cut through (café area) to other areas of the building, by-passing secure lines.
- Consider the postal strategy. Postal/parcel theft is still very high within the MET and other forces. The leaving of parcels on view within a lobby area should be avoided. Look at management practices to avoid this scenario. It could mean that no parcels are to be delivered to the venue unless that person receiving the item is at the location. Some residential developments have banned the delivery of parcels and have directed residents to have the parcel delivered to a nearby post office or parcel locker in the surrounding area. Post boxes in the lobby area to be security rated to TS009.
- All external door sets including the main entrance and or exit doors, café entrance, refuse store to be certified to either LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2.
- All internal door sets for offices, and student accommodation should be rated to a minimum of PAS 24:2022. All the doors for the student accommodation should also have door viewers/spyholes to aid with further vetting of person/s outside their doors.
- Signage across the site to include room names and number displayed on the front and from the inside of these rooms, so the user can effectively communicate exact location in the event of an emergency. Also look at vision panels for doors (communal/classroom/multi use room) so any threat can be detected prior to the door being opened. Thumb turn release locks so that doors can be opened from the inside in an emergency or secured to protect from an outside threat.
- If there are separate tenants within the building consider compartmenting the floors with access control and or lift destination control. With any door that requires access control it is recommended that it be certificated to PAS24:2022 and dual certified for fire and security.
- No fire drop key emergency access to be accessible from the exterior. This can be facilitated with the use of a fire drop key cover rated to STS 205 BR2 (example Gerda ECE enclosure). If an un-enclosed fire drop key is desired it should be a minimum of 2.5m above the ground.

- Fast access building plans should be available externally at every entry/exit point for fire and rescue which should be rated to STS 205 BR2 (example Gerda Premises Information Box).
- Review the green break glass locations. Green break glass should allow egress in an emergency and not permit a potential intruder further access into a building. Look at protective plastic cowls or locally alarmed cowls to mitigate the risk of an accidental activation.
- Assess the café being cashless. Not having a safe with cash should be advertised to inform potential thieves that there is no reward contained within the building.
- Consider carefully what areas will be public access.
- Cycle store doors to be certified to either LPS 1175 Issue 8 B3 (SR2) or STS 202 BR2, with fob access due to the potential value of the stored bikes.
- Outdoor visitor/short stay cycle stands to be London stand and not Sheffield stands. The London stands include a tapping bar which runs between the two (2) main posts. Locks need to be placed above the tapping bar to prevent the lock being moved to the ground and easily smashed. The stands need to be set into the ground so no bolts/fixings are exposed. The tubing of the stand can also be filled with an aggregate such as concrete which adds to the weight and overall robustness of the product.

Other considerations

- 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.
- Ground and first floor glazing should be enhanced to mitigate against the risk of criminal damage or burglary. A minimum security rating of BSEN 356:2000 P2A (although P4A may be better suited in some areas).

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. It is recommended that physical security features (security rated doors and windows) be in place to safeguard staff and visitors to the venue. It is not known whether the facility will be staffed 24/7 and as such the presence of a security team should not be solely relied upon.

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/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

Jasdeep

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.”

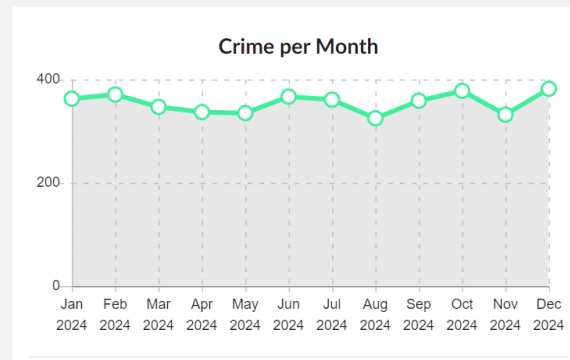
Top reported crimes

Most commonly reported crimes during Dec 2024

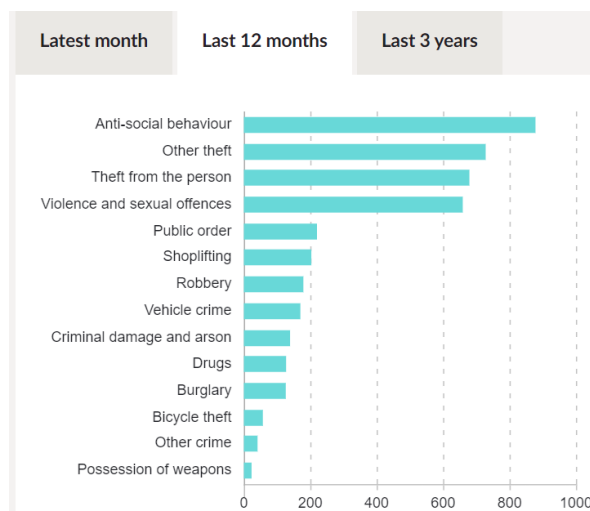
Other theft	89
Theft from the person	63
Violence and sexual offences	54
Anti-social behaviour	53

Crime levels overview

Crime for last year



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



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

Type	Total	Percentage
Anti-social behaviour	880	20.7%
Bicycle theft	59	1.4%
Burglary	128	3%
Criminal damage and arson	141	3.3%
Drugs	129	3%
Other theft	730	17.1%
Possession of weapons	25	0.6%
Public order	222	5.2%
Robbery	181	4.3%
Shoplifting	205	4.8%
Theft from the person	681	16%
Vehicle crime	172	4%
Violence and sexual offences	661	15.5%
Other crime	43	1%

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.’