



Laura Dorbeck  
Planning Solutions Team  
London Borough of **Camden** 2nd Floor,  
5 Pancras Square

Design Out Crime Office  
North West DOCO Office,  
Ruislip Police Station,  
The Oaks,  
Ruislip,  
HA4 7LE  
Telephone: 0208 7333703  
Email:  
DOCOMailbox.NW@met.pnn.police.uk  
www.met.police.uk  
Your ref: **2024/0993/P**  
**Our ref: NW 7915**  
(17/03/2025)

Good afternoon,

Thank you for allowing me to comment on the proposed **part demolition, restoration and refurbishment of the existing Grade II listed building, roof extension, and excavation of basement space, to provide a theatre at lower levels, with ancillary restaurant / bar space (Sui Generis) at ground floor level; and hotel (Class C1) at upper levels; provision of ancillary cycle parking, servicing and rooftop plant, and other associated works. RECONSULTATION due to amendments to height, design and massing of roof extension.** The address is **135 - 149 Shaftesbury Avenue, London, WC2H 8AH.**

The development falls within the policing ward of Holborn and Covent Garden. The top reported crimes for the month of January 2025 (taken from the police UK website) were theft from the person, other theft antisocial behaviour and violence and sexual offences. Other offences of note for this area include shoplifting, burglary, criminal damage, robbery and bicycle theft.

I have not have any 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.

### **I object to the proposal in its current form/design**

In relation to this application I have the following comments/recommendations to make:

- It is strongly recommended that advice be sought from the Counter Terrorist Security Advisor (CTSA) covering this area. Although mentioned within the design and access statement that a meeting was held back in 2022, has there been any further consultation?
- The building currently suffers with poor activation on the ground floor on the facades facing Stacey Street and St Giles Passage. The current design does little to change this.

- The main hotel entrance located on New Compton Street is quite recessed. This can lead to an area where persons could loiter. There is also no vision around the corner for someone leaving this space a person could conceal themselves around the corner and monitor those leaving. This could make it an area favourable for theft from the person. Bicycle/scooter enabled crime is prevalent and with the main entrance away from the activity of Shaftesbury Avenue this could become a hotspot. Phoenix Park has also had issues with drug offences.
- The main front of house and reception area on floor five (5) will mean that the ground floor space could be vacant. It is strongly recommended that this area be staffed and monitored with CCTV. The luggage room is located on this level and if labelled and advertised could become a target for opportunistic thieves.
- Access to floor five (5) allocated as front of house will be open to the general public between the hours of 0800 and 2300 when it will become a guest's only area. How will this be managed? Compartmentation and control of movement within a building reduces to risk of opportunistic theft. How will visitors (not guests) access the front of house area of floor five (5) without having access to other areas of the hotel?
- The outside space on floor five (5) needs to have a secure railing to prevent climbing over. It appears to indicate that planters might be put in front of some parts of the railing which could be used as a step to climb over. It is recommended that no such climbing aids be factored into the design and the railing to be a proportionate height to mitigate this risk.
- Will the site will be covered by CCTV 24 hours a day? It is recommended that this would be monitored constantly. This can then allow site security/management and staff 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/vehicle 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). 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).
- It is strongly recommended that room names be displayed on both sides of the door. This can allow for a faster response time if an issue or incident should occur.
- Although not currently legislation the venue may 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.

The ward of Holborn and Covent Garden has one of the highest crime rates within London and any proposed security should be proportionate to this fact. There is mention of physical security within the submitted documents but no detail as to how this might be achieved. I appreciate that this may intentionally have been omitted from the public portal.

**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.**

The above list is not exhaustive and does not contain recommendations for specific security ratings in regards to products such as doors and windows. 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.

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](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*

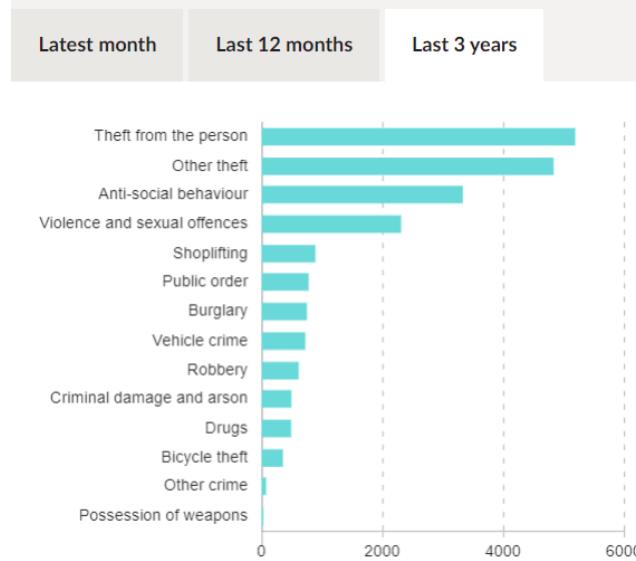
*London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”*



Line graph showing the number of crimes over the last three (3) years for Holborn and Covent Garden ward.

## Crime types description

for the last 3 years (from Mar 2022 to Jan 2025)



Bar chart indicating the types of recorded crimes over the last three (3) years on Holborn and Covent Garden ward

Type	Total	Percentage
Anti-social behaviour	3346	15.9%
Bicycle theft	367	1.7%
Burglary	764	3.6%
Criminal damage and arson	507	2.4%
Drugs	503	2.4%
Other theft	4850	23%
Possession of weapons	41	0.2%
Public order	793	3.8%
Robbery	628	3%
Shoplifting	905	4.3%
Theft from the person	5207	24.7%
Vehicle crime	738	3.5%
Violence and sexual offences	2323	11%
Other crime	89	0.4%

Number of crimes on Holborn and Covent Garden ward over the last three (3) years

**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.'*