14 Blackburn Road, London, NW6 1RZ

Security Strategy

(incorporating a Security Needs Assessment)

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Report Information

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Change Control

Issue	Date	RIBA Stage	Description/Amendments
01	14 Mar 2025	2	First Draft Issue
02	21 Mar 2025	2	Updated in response to design team comments
03	28 Mar 2025	2	Re-issued as final. No further amendments.

Document Register

This report is based on the information contained in the documents listed below:

Reference	Title	Revision
FST-BRC-HTA-XX-XX-SK-A-0001	Existing Site Plan	P01
FST-BRC-HTA-XX-B-SK-A-0198	Basement & Platform Level Floor Plan	P12 (for planning)
FST-BRC-HTA-XX-00-SK-A-0200	Street Level Floor Plan	P17 (for planning)
FST-BRC-HTA-XX-M-SK-A-0201	Mezzanine Level Floor Plan	P12 (for planning)
FST-BRC-HTA-C3-01-SK-A-0223	C3 Level 01 Floor Plan	P10 (for planning)
FST-BRC-HTA-C3-02-SK-A-0224	C3 Level 02 Floor Plan	P10 (for planning)
FST-BRC-HTA-C3-03-SK-A-0225	C3 Level 03 Floor Plan	P12 (for planning)
FST-BRC-HTA-C3-04-SK-A-0226	C3 Level 04 Floor Plan	P10 (for planning)
FST-BRC-HTA-C3-05-SK-A-0227	C3 Level 05 Floor Plan	P10 (for planning)
FST-BRC-HTA-C3-06-SK-A-0228	C3 Level 06 Floor Plan	P13 (for planning)
FST-BRC-HTA-C3-RF-SK-A-0229	C3 Roof Plan	P04 (for planning)
FST-BRC-HTA-PB-01-SK-A-0233	PBSA Level 01 Floor Plan	P12 (for planning)
FST-BRC-HTA-PB-02-SK-A-0234	PBSA Level 02 Floor Plan	P10 (for planning)
FST-BRC-HTA-PB-03-SK-A-0235	PBSA Level 03 Floor Plan	P12 (for planning)
FST-BRC-HTA-PB-04-SK-A-0236	PBSA Level 04 Floor Plan	P11 (for planning)
FST-BRC-HTA-PB-05-SK-A-0237	PBSA Level 05 Floor Plan	P10 (for planning)
FST-BRC-HTA-PB-06-SK-A-0238	PBSA Level 06 Floor Plan	P10 (for planning)
FST-BRC-HTA-PB-07-SK-A-0239	PBSA Level 07 Floor Plan	P10 (for planning)
FST-BRC-HTA-PB-08-SK-A-0240	PBSA Level 08 Floor Plan	P10 (for planning)
FST-BRC-HTA-PB-RF-SK-A-0241	PBSA Roof Plan	P04 (for planning)
FST-BRC-HTA-SC-A-0800	Accommodation Schedule	P09 (for planning)

Table of Contents

1 Executive Summary

This Security Strategy addresses the security risks and associated requirements for 14 Blackburn Road:

Demolition and redevelopment of the Site for a mixed-use development comprising purpose built student accommodation (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard, cycle parking, hard and soft landscaping, amenity spaces and plant ('the proposed development').

The document identifies the potential security risks associated with the proposed uses and location, and describes a strategic approach to mitigating these risks effectively.

The Security Strategy recommends an integrated approach, comprising a balanced adoption of Crime Prevention through Environmental Design (CPTED) principles, physical and technical security measures, and operational procedures.

The report is structured to act as the Security Needs Assessment (as defined in BREEAM HEA 06) for the project. Therefore, the Security Strategy begins with a visual audit and background analysis of the site (Section 3). It summarises the proposed development and associated security needs (Section 4) and outlines relevant security and town planning considerations (Section 5). Stakeholder consultations (Section 6) provide insights from key parties, including police and project team representatives. The security risk assessment (Section 7) identifies specific threats and vulnerabilities, followed by a security strategy (Section 8) that formulates the overarching security objectives and concepts. Finally, Section 9 provides detailed recommendations for security controls, ensuring the proposed measures are appropriate and proportionate.

The report is also aligned to the relevant parts of:

- 'Approved Document Q: Security - Dwellings' (ADQ).
  This document gives guidance on how to comply with Requirement Q1 of the Building Regulations of England and Wales.
- Secured by Design (SBD) Residential and Non-residential.
  These documents are designed to assist the building, design and construction industry in meeting the requirements of SBD certification.

2 About the Author

Gareth Hulmes of Toren Consulting Limited acted as the author of this Security Strategy. For the purposes of BREEAM HEA 06 compliance, Gareth also satisfies the requirements set out for a 'Suitably Qualified Security Specialist' (SQSS), as defined in BREEAM UK New Construction 2018/V6. Gareth is:

1. Recognised as an 'SQSS' by BRE Global by virtue of his Chartered Security Professional (CSyP) status. Refer to the associated BRE Global HEA 06 guidance note here. Gareth's public CSyP listing can be viewed here.

REGISTERED CHARTERED SECURITY PROFESSIONAL

2. A Secured by Design (SBD) Licensed Consultant, possessing a Full Licence, enabling him to provide associated guidance and advice at all stages of a development from planning through to completion. Gareth's SBD listing can be viewed here.

Secured by Design
SBD
Licensed Consultant

3 Introduction & Visual Audit

3.1 Background

This report relates to a proposed mixed-use development in the London Borough of Camden. This section describes a visual audit undertaken at the site and its surroundings, to ascertain the attributes of the local environment that could influence the security arrangements for the proposed development.

3.2 Site Location

The site location is indicated by the red outline in Figure 01 below, and falls within the a wider consented masterplan (The 02 Centre, 2022/0528/P) to provide a mixed-use development which extends to the Finchley Road tube station to the East. 14 Blackburn Road is within Outline Phase 2 of the O2 masterplan, referred to as plot S8.

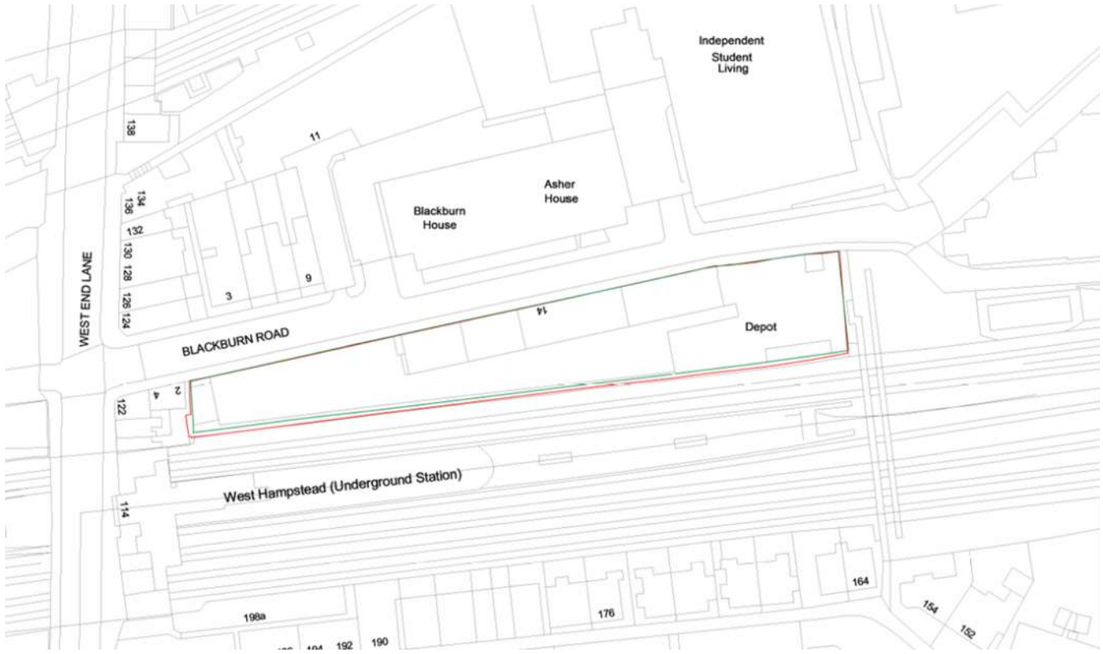

Figure 01 Site Location (HTA Design)

The proposed development will be located on Blackburn Road. The site is bordered by TfL train tracks to the south, the northern entrance to 'Granny Dripping Steps' to the east, and a small cluster of commercial units to the west on the junction of Blackburn Road and West End Lane. West Hampstead underground and overground stations are located close to the site on West End Lane which service the Jubilee/Metropolitan and Mildmay lines respectively.

The site is currently occupied by a builders' depot with associated parking and is accessed off Blackburn Road. The following subsections consider aspects of the site's surroundings to establish factors which may need to be considered in the detailed design and specification of the development.

3.3 Blackburn Road & Granny Dripping Steps

During the visual audit, Blackburn Road was observed to be busy with both vehicular and pedestrian traffic. A PBSA development known as Haywood House (by iQ Student Accommodation) is already in operation opposite the site, generating a degree of foot traffic and providing a level of natural surveillance along Blackburn Road.

Significant levels of graffiti were observed during the visual audit indicating an issue with antisocial behaviour and criminal damage in the area. There was also a general sense of disrepair and lack of ownership conveyed by piles of rubbish and broken gates. Clear ownership of space is important in deterring criminality because criminals are less likely to target areas that they perceive to be well-managed and maintained. The proposed development should seek to communicate a clear sense of guardianship through effective management and maintenance. This will support community safety in the immediate vicinity and (together with other preventative measures) reduce the susceptibility of the building elevations to damage and abuse.

Figure 02 Evidence of rubbish (left), disrepair (middle) and graffiti (right) along Blackburn Road

Various defensive measures could be seen on many of the existing buildings along Blackburn Road, possibly indicative of historic issues with antisocial behaviour in the area. The site of the proposed development was seen to have a mixture of palisade and barbed wire fencing, and anticlimb measures such as spiked toppings. Neighbouring properties also had similar defensive measures in place.

These types of treatments, whilst potentially effective, present an unnecessarily hostile appearance and have the potential to artificially raise the fear of crime for ordinary members of the public.

Figure 03 Anticlimb measures on the proposal site (left).
Fencing and anticlimb measures on a neighbouring property along Blackburn Road (right).

The northern entrance to Granny Dripping Steps is located adjacent to the site to the east. During the visual audit, Granny Dripping Steps was observed to be heavily graffitied and had significant amounts of litter around the northern entrance. The route itself is shrouded by vegetation which inhibits visibility of the bridge from its surroundings and impedes natural light.

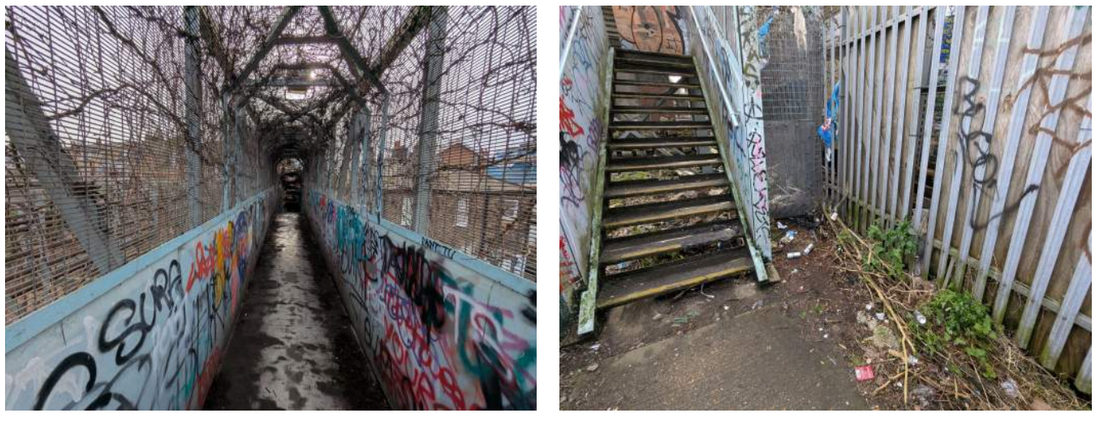

Figure 04 View south along Granny Dripping Steps foot bridge (left).
Evidence of litter at the northern entrance (right).

Graffiti is often targeted at accessible, blank (unfenestrated) elevations and surfaces. Therefore, it can be valuable to consider the use of facade design techniques which either reduce their suitability as a surface for graffiti, or place an effective barrier (physical or symbolic) between such elevations and public space. This is to create 'defensible space' which can also be used to emphasise the private ownership of the space.

Where this is not feasible, measures such as anti-graffiti coatings can be deployed which support the effective and timely removal of graffiti from cladding materials. Damage which is left to accumulate can lead to further decline (known as 'the broken window theory'), therefore rectification of damage as part of a building's ongoing management plan is vital.

3.4 Billy Fury Way, Potteries Path & Black Path

Billy Fury Way, Potteries Path and Black Path are all pathways in the local area. During the visual audit, Black Path was observed to be heavily graffitied and had limited natural or formal (i.e. video) surveillance measures. Several street lamps were present along the path, however video surveillance cameras were only present in limited areas along the ~500m long route. Although the northern edge of the path was bordered by residential properties, there was limited natural surveillance as most of the properties had either curtains drawn or had their views masked by tall fencing.

Figure 05 Views east (left) and west (right) along Black Path.

Potteries Path is located to the north of the site beyond the overground railway tracks. The western part of the path off West End Lane was well-maintained. This section of the path ran alongside a new residential development and many of the apartments and their balconies overlooked the path, providing opportunities (once occupied) for natural surveillance to the area. However, the eastern section of the path was not well-maintained and included several instances of graffiti, rough sleeping and defensive architectural features indicating possible antisocial activity in the area.

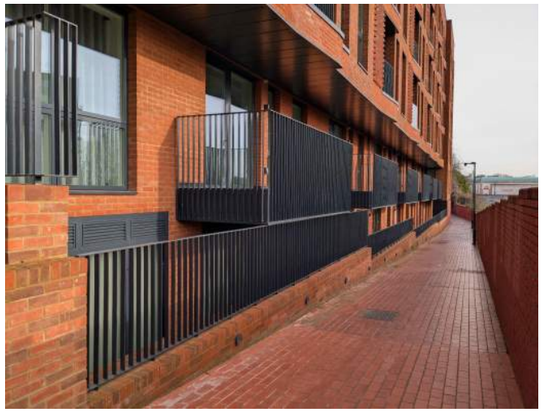

Figure 06 Western section of Potteries Path next to the new residential development (left). Evidence of rough sleeping along Potteries Path (right).

Billy Fury Way is located to the north of the site and connects Blackburn Road with West End Lane to the west and Finchley Road to the east. During the visual audit, Billy Fury Way was observed to be heavily graffitied, with significant amounts of litter and evidence of drug use indicating antisocial behaviour in the area. The audit team felt generally vulnerable using this route, with limited exit points, lighting, or sources of local surveillance (natural or video).

Figure 07 Graffiti (left) and litter (right) along Billy Fury Way.

3.5 Wider Area & the Proposed Masterplan

West Hampstead underground station is located directly behind the site with the rear boundary adjoining to the railway tracks which service the Jubilee Line. From the platform, it was observed that the southern perimeter treatments of the existing builders' depot were heavily graffitied. This further evidence of graffiti increases the need to be mindful of this issue in the design and material selection of the proposed development.

Figure 08 Evidence of graffiti from the West Hampstead underground platform.

The extent of local new development is depicted in Figure 09, whilst further mixed used re-development forming part of the consented The 02 Centre Masterplan is proposed further east. Whilst new development on this scale attracts legitimate users and opportunities to improve the immediate area, such a concentration of residences also has the potential to attract an increased risk of certain crime types (e.g. burglary) owing to the increase in volume of potential targets. Such a transition can also take a significant amount of time to take effect.

Figure 09 New and proposed development around the 14 Blackburn Road site (HTA Design)

4 The Proposed Development

This section of the Security Strategy provides an overview of the development and explains features of the development that have been considered/incorporated to reduce the risk of crime.

4.1 Design Development

The opportunity to improve the immediate site surroundings has been a driving factor in the development of the proposals. The project team have made a concerted effort to provide active frontages and improve the levels of both personal safety and usability of Blackburn Road. This includes the sensitive relationship between the development and Granny Dripping Steps. During the production of this Security Strategy, updates were made to the proposals as a result of ongoing design development, partly influenced by security considerations highlighted during meetings between Toren and the project team. The components of the design which have developed include:

- The capability for segregation of the PBSA entrance lobby and cafe using an internal roller shutter which will be closed outside of cafe operating hours. This capability was discussed with the police Designing Out Crime Officer (DOCO, refer to section 6.2) and is designed to separate the spaces to enable them to operate independently from one another, avoiding conflicts of use.
- The re-orientation of the substations to be accessible from the eastern elevation. Previously accessible from the south, the revised positioning has enabled access to the concealed space along the southern elevation to be gated, reducing the opportunity for antisocial behaviour and rough sleeping to occur in that location.

4.2 Overview and Proposed Floor Plans

The proposals seek the demolition and redevelopment of the site for a mixed-use development comprising purpose built student accommodation (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard, cycle parking, hard and soft landscaping, amenity spaces and plant.

The proposed development comprises two distinct buildings that are linked at ground level. The C3 building will be 4-7 storeys including a taller ground floor and the PBSA building will be 10 storeys including a ground floor and amenity mezzanine level. There is a double height space spanning these lower two floors in the café at the base of the PBSA.

The following Figures display the general arrangement of key floors of the proposed development.

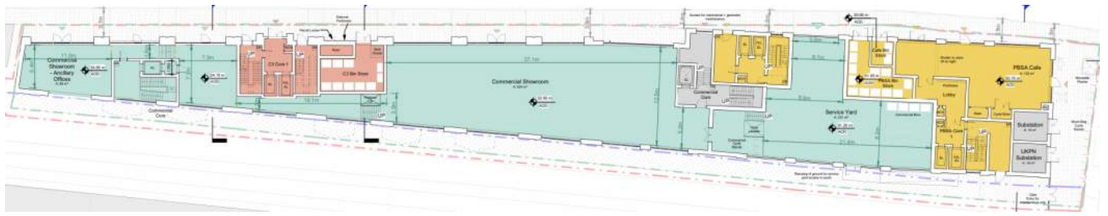

Figure 10 Proposed street level floor plan (HTA Design)

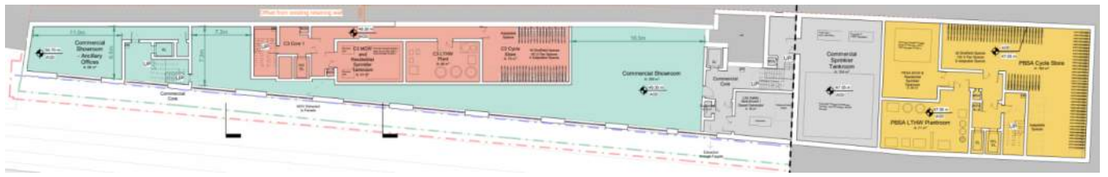

Figure 11 Proposed basement and platform level floor plan (HTA Design)

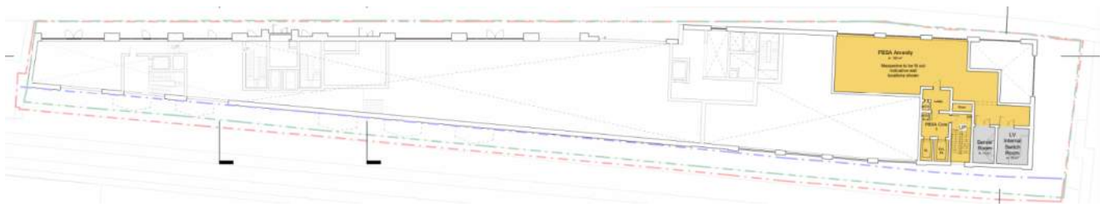

Figure 12 Proposed mezzanine floor plan (HTA Design)

Figure 13 Proposed 1st level floor plan (HTA Design)

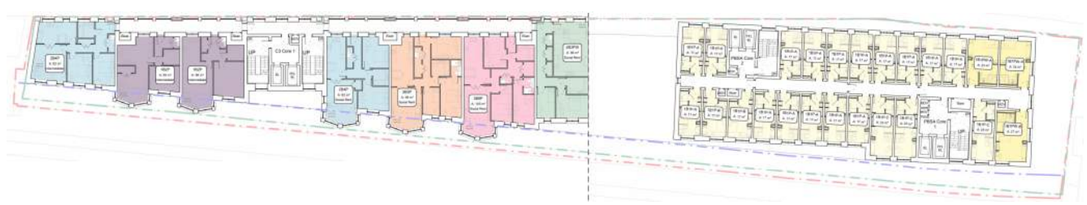

Figure 14 Proposed typical floor plan (HTA Design)

Figure 15 Proposed 6th level floor plan (HTA Design)

4.3 Summary

The proposals seek to demolish the existing buildings on site to erect a new, mixed-use development comprising the following principal functions:

Ref	Use	Description
4.3.1	**PBSA**	The PBSA will be provided in the eastern block of the development, comprising a tower of 8 storeys (above ground) incorporating 192 residences. The accommodation will comprise self-contained studios. Internal and amenity space will be provided at mezzanine and level 1 respectively. The street level comprises a dual-functioning entrance lobby and cafe space (see 4.3.4), with the entrance lobby capable of being segregated outside of cafe operating hours. A further lobby is designed to accommodate postboxes and provides onward access to the lifts serving the upper floor PBSA accommodation and the basement level (containing cycle storage and plant space).
4.3.2	**Affordable Homes**	Affordable homes will be provided to the western block of the proposals, comprising a tower of 6 storeys (above ground). External amenity space will be provided at the 6th floor level. The street level comprises a communal entrance lobby incorporating lifts serving the upper floor affordable homes and basement (containing cycle storage and plant space). Parcel storage boxes and mailboxes are provided externally along the northern elevation.
4.3.3	**Commercial**	Commercial space will be provided on street and platform levels. This will provide 1694 sqm (GEA) of floor space and include a service yard accessible off Blackburn Road via a bespoke vehicular entrance gate.
4.3.4	**Cafe**	A publicly accessible cafe space will be provided at street level beneath the PBSA accommodation, intended to support integration between students and the wider local community. The cafe will be accessible from the north and east elevations local to the junction of Blackburn Road and Granny Dripping Steps.
4.3.5	**External Areas**	Externally, the proposals will seek to widen the footpath along Blackburn Road to improve pedestrian movement. This will result in a semi-sheltered footpath owing to the upper floors of the development overhanging the footpath. An external amenity space will be provided between the eastern elevation and Granny Dripping Steps to function as an outdoor seating area for the cafe. This use will also support the general enhancement and repurposing of the external space in this location.
4.3.6	**Refuse**	Dedicated, internal waste stores will be provided for the PBSA, cafe and affordable homes uses, each accessible from external entrance doors on the northern facade.

4.4 Access

This section describes the access and egress arrangements for the range of building users anticipated to use the development, based on discussions with the client and architect. The coloured arrows indicate the path to which they correspond on the ground floor 'User Journey Mark-up' drawings contained in Figure 20, identifying 'challenge points' (i.e. locations at which users must present a valid token) and 'end points' (i.e. where users leave the ground floor demise)[1].

Several of these access arrangements will be developed further as the project progresses, and/or are built upon by the recommended controls detailed in section 9. The arrangements should therefore be read in conjunction with the information contained in that section.

Use	User Group	Description
PBSA	*Resident*	The precise means of access for PBSA residents will be dependent on the time of day (i.e. whether the cafe space is in operation). With this in mind, residents will use their access control token at the following locations in sequence: 1. Main PBSA entrance door (outside of cafe operating hours only). 2. Door into the internal PBSA lobby (during cafe operating hours only, with access into the cafe space being publicly available). 3. PBSA lobby into the Core 1 lift lobby. 4. Upper floor lift landings into communal hallways. 5. Individual studio entrance doors.
		Cyclists will enter the PBSA using the same arrangements as non-cyclists above, but will proceed to the basement level to access cycle storage facilities. Once at the basement, cyclists will use their token to enter the cycle store. Once their cycle is stored, cyclists will travel to the upper floors as per arrangements described above.
	Visitor	Visitors to the PBSA will interact with intercom systems, linked to individual residences, at the following locations in sequence: a) Main PBSA entrance door (outside of cafe operating hours only). b) Door into the PBSA lobby (during cafe operating hours only). c) Door from the PBSA lobby into the Core 1 lift lobby. d) Door from the upper floor lift landings into communal hallways. On each occasion, the host resident will be required to admit the visitor using a door release button on their intercom receiver.
	Couriers and food delivery	Couriers will park where permitted then seek entry to the PBSA per 'Visitor' arrangements. Once granted entry, the courier will deposit mail within the ground floor mail/parcel boxes or deliver items directly to individual studios (using the procedures described for 'Visitors').
Affordable Homes	*Resident (including cyclists)*	Residents will use their token to enter the communal entrance lobby from Blackburn Road and then again to call the lift. Any residents requiring cycle storage facilities will exit the lift at platform level and use their token to gain access to the cycle store. Residents will then proceed to the upper floors using the lifts before using their token to enter the doors off lift landings onto residential corridors. Doors to individual apartments are anticipated to be key-operable externally.
	Visitor	Visitors to the affordable use will interact with intercom systems, linked to individual residences, at the following locations in sequence: a) Main communal entrance door b) At lifts on ground floor (to request a lift) c) Door from the lift landings into communal corridors on upper floors On each occasion, the host resident will be required to admit the visitor using a door release button on their intercom receiver.
	Couriers and food delivery	External mail and parcel deposit solutions are proposed. Couriers will deposit mail and parcels externally local to the main communal entrance without requiring access to the building. Alternatively couriers may seek to deliver directly to residents as per 'Visitor' arrangements, particularly in the case of larger deliveries.
Refuse collection	*PBSA & Affordable*	Bins will be retrieved directly by the refuse collection team via the appropriate external refuse store entrance using a token (or other method as determined by the refuse collection agency).
	Industrial	Refuse collection will be subject to tenant/occupier requirements.

[1] Access arrangements have not been determined for users of the commercial showroom or cafe, as these will be subject to tenant/occupier requirements.

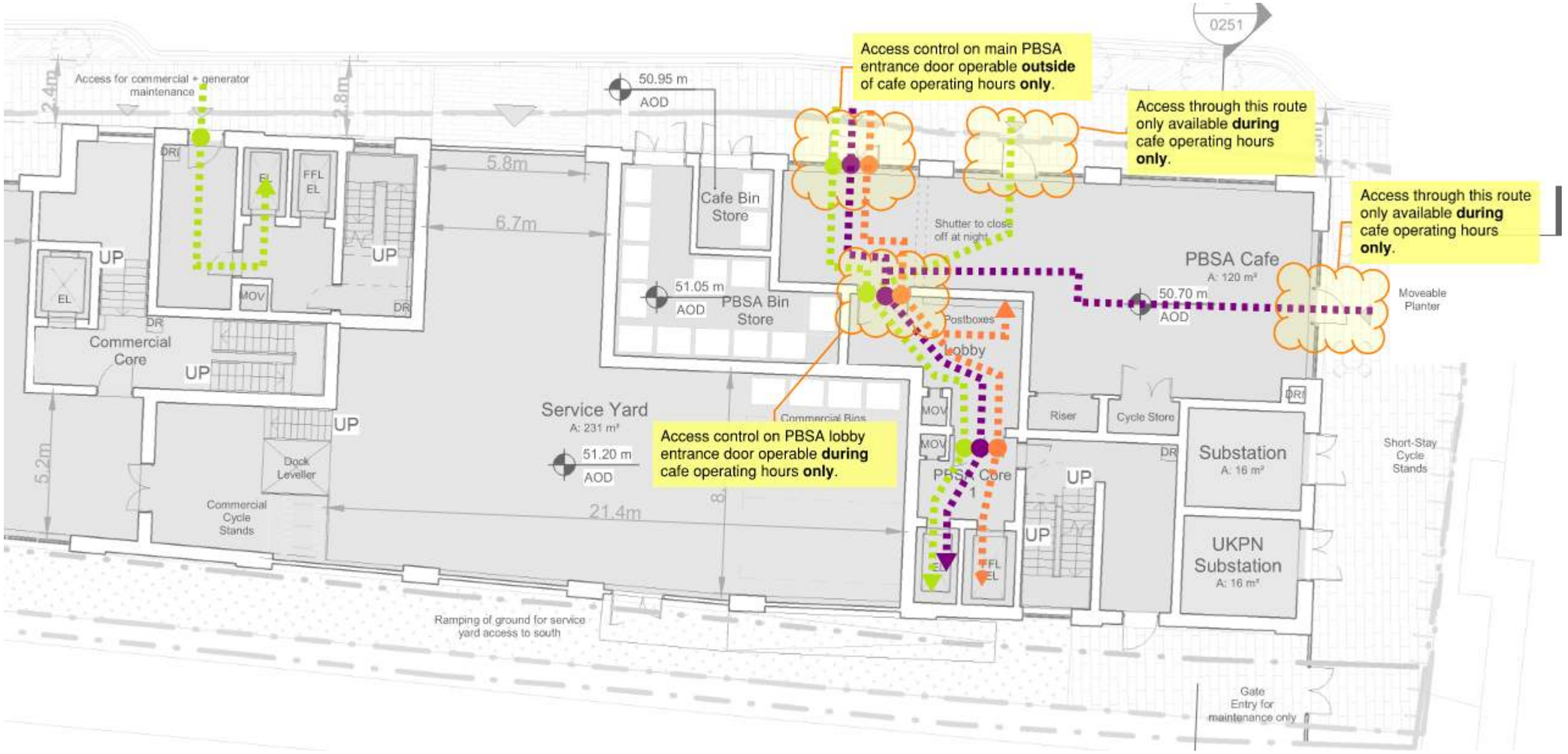

Figure 16 User journey mark-up - PBSA

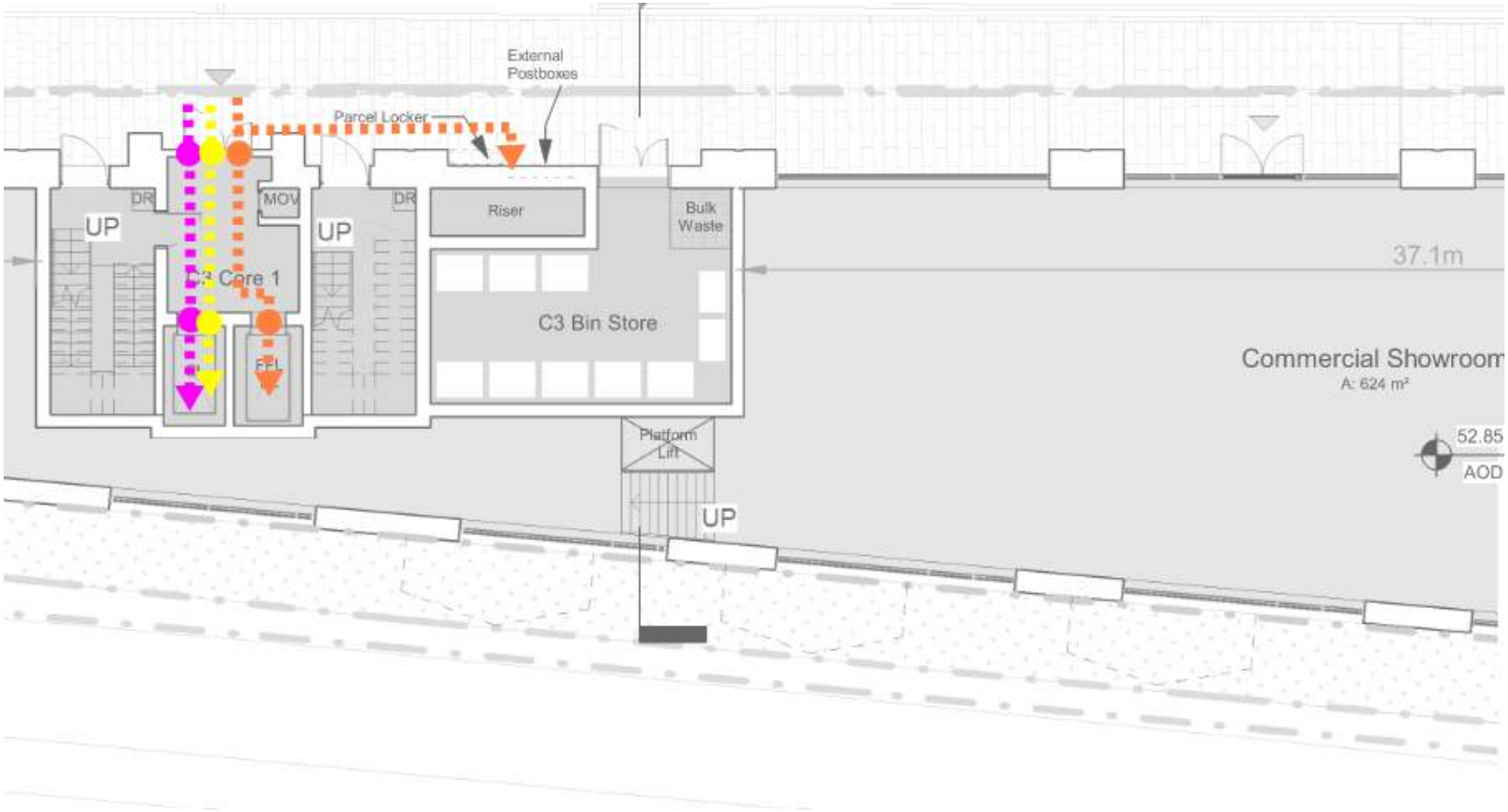

Figure 17 User journey mark-up - Affordable

4.5 Staffing

The PBSA will be provided with a concierge during the day time only. The affordable homes element of the development will not have a concierge provision.

It is understood that management teams (remotely based) working on behalf of the Affordable and PBSA operators will perform tasks relating to upkeep and management of the respective functions.

Staffing arrangements for the Flexible Class E space are not currently known and will be driven by tenant requirements, but are assumed to reflect typical staffing and operating hours present in similar establishments.

The cafe will be operated either by the PBSA management company - or by a cafe operator appointed by the PBSA management company - and will reflect the typical operating hours present in similar establishments (i.e. not 24/7).

5 Security and Town Planning

A requirement for developments to consider and to design against crime and terrorism is described in several sections of The National Planning Policy Framework (NPPF) 2024, The London Plan 2021, and the Camden Local Plan (2017).

5.1 The National Planning Policy Framework (NPPF) 2024

The NPPF 2024 contains the following paragraphs, relevant to security:

Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- *a) anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development; and*
- *b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*

5.2 The London Plan 2021

The London Plan 2021 contains the following paragraphs, relevant to security:

Policy GG5 Growing a good economy- Point 1.6.4 Equally significant in a global city is the threat of terrorism, and new forms of attack require new forms of defence. *Large-scale fires also remain a possibility in London. As* ***public places are made safer and existing housing is improved****, these threats underline the importance of* ***collaborative planning*** *with London's police forces and public safety experts, the London Fire and Emergency Planning Authority.*

GG6 Increasing efficiency and resilience; *create a safe and secure environment which is resilient to the impact of emergencies including fire and terrorism.*

Policy D1 London's form, character and capacity for growth; *demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and well-being indicators, population density, employment data, educational qualifications,* ***crime statistics****).*

Policy D3, Experience - Optimising site capacity through the design-led approach; *achieve safe, secure and inclusive environments.*

Point 3.3.14 *Measures to* ***design out crime*** *should be integral to development proposals and be considered early in the design process. Development should* ***reduce opportunities for antisocial behaviour, criminal activities, and terrorism, and contribute to a sense of safety*** *without being overbearing or intimidating. Developments should ensure good* ***natural surveillance****, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.*

Policy D11 Safety, security and resilience to emergency; *Boroughs should work with their local Metropolitan Police Service* ***'Design Out Crime' officers and planning teams,*** *whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support the provision of necessary infrastructure to* ***maintain a safe and secure environment and reduce the fear of crime.*** *Policies and any site allocations, where locally justified, should be set out in Development Plans.*

Point 3.11.3 Measures to design out crime, including counter-terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme34 *published by the Police. Further guidance is provided by the Government on* ***security design35****. This will ensure development proposals provide adequate protection,* ***do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective.*** *Development proposals should incorporate measures that are* ***proportionate to the threat of the risk*** *of an attack and the likely consequences of one.*

Point 3.11.4 *By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should* ***incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed.*** *Consideration should be given to* ***physical, personnel and electronic security*** *(including detailed questions of design and choice of materials, vehicular stand-off and access, air intakes and telecommunications infrastructure).* ***The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.***

5.3 Camden Local Plan (2017)

The Camden Local Plan 2017 contains the following paragraphs, relevant to security:

Design and security

4.87 Consideration of how crime, disorder and fear of crime can be addressed is an important element in good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all developments to incorporate ***appropriate design, layout and access measures to help reduce opportunities for crime****, the fear of crime and to create a more safe and secure environment.* ***Crime Impact Assessments*** *will also be sought for major developments.*

4.88 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.*

4.89 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.*

Pedestrian use and natural surveillance

4.93 Encouraging pedestrian use is known to ***deter crime by natural surveillance*** *(i.e. limiting the opportunity for crime by increasing the likelihood of it being seen). To encourage pedestrian use, the Council aims to* ***ensure spaces are permeable*** *(i.e. easy to walk and cycle through). Gated community developments are therefore unlikely to be acceptable.*

4.94 To further encourage pedestrian use, developments should also ***maximise the use of 'active frontages'*** *designed to give buildings a safer, more welcoming appearance and* ***enable overlooking of public areas****. External security features which obscure the front of buildings such as solid roller shutters can make places seem hostile and unsafe which can discourage pedestrian movement, they will therefore be resisted. Further information is available regarding the design of security features is set out within Policy D1 Design, Policy D3 Shopfronts and our supplementary planning document Camden Planning Guidance on design.*

Counter-terrorism

4.95 Camden's position in the centre of a major international city, its high profile major transport interchanges and famous buildings and places make resilience to terrorism an important issue in some areas of the borough. If necessary, the Council will therefore work with the Ministry of Defence's Strategic Planning Team and local security advisors and take into account the most up-to-date information provided regarding potential security risks. The design of these buildings, spaces and transport facilities will be expected to include ***appropriate and proportionate security and community safety measures*** *and* ***follow design principles contained within the government publication Protecting Crowded Places: Design and Technical Issues****.*

6 Stakeholder Consultation

Consultation took place between Toren and relevant stakeholders to develop a detailed insight into the intended function of the development, identify pertinent background threat information and establish potential strategies to address crime and antisocial behaviour.

6.1 Client and Design Team

A meeting was held between Fifth State, HTA Design and Toren on 11/12/2024. The discussion during that meeting is summarised below, whilst full minutes are provided in Annex B.

1. The proposed development consists of two distinct blocks; affordable housing in the western block and PBSA in the eastern block. Flexible Class E space and a cafe will occupy the length of the development at street level.
2. The design of the development is intended to activate and increase footfall along Blackburn Road and is cognisant of the larger local masterplan.
3. Affordable housing and PBSA residences will have separate access points. Toren and HTA discussed the complications associated with the PBSA being accessible solely through the public cafe (e.g. in respect of tailgating and courier access).
4. Toren identified the space between the cafe and the Granny Dripping Steps on the eastern elevation as a potential security concern, requiring careful design to prevent antisocial behavior and ensure integration with the surrounding area.

6.2 Police Designing Out Crime Officer (DOCO)

A meeting was held between the Metropolitan Police DOCO, HTA Design, and Toren on 16/12/24. The discussion during that meeting is summarised below, whilst full minutes of the meeting are provided in Annex C.

1. The DOCO advised Secured by Design related planning conditions are occasionally applied to new developments by Camden Council, and the Metropolitan Police would encourage this for 14 Blackburn Road if consulted at planning application stage.
2. The DOCO supported the widening of the footpath along Blackburn Road and the associated overhang of the floors above. Whilst sheltering a space can create conditions which attract crime and antisocial behaviour, the DOCO was satisfied that the degree of sheltering proposed would not disproportionately raise the opportunity for such issues to occur.
3. The adoption of a bespoke gate for the service yard was supported by the DOCO who advised that the security measures providing resistance to forced entry (for the purposes of Secured by Design compliance) could be moved internally to the connecting door into the commercial showroom instead.
4. The DOCO advised that the local area has a history for antisocial behavior, drug dealing, street drinking, rough sleeping and criminal damage; particularly near to pedestrian pathways (such as Billy Fury Way, and Potteries Path and Black Path further north).
5. The DOCO supported the intent to redesign and open up the area around Granny Dripping Steps noting it had the potential to improve safety conditions (i.e. those relating to personal security).
6. The DOCO agreed with Toren's observations regarding the previously combined PBSA entrance and public cafe, and supported the provision of separate entrances to each use to deter tailgating and unauthorised access to the PBSA.
7. The DOCO recommended PAS 24 rated doors for building entrance points and to the individual apartment entrance doors to the affordable residential. However, notwithstanding the provisions of Approved Document Q, the DOCO advised the same provision was not considered necessary for individual student studio rooms to the PBSA (providing access control is provided to each upper floor off the lift landing).

7 Security Risk Assessment

7.1 Methodology

Security risks comprise a combination of threats, vulnerabilities and impacts. A security risk depends on the **likelihood** of threat actors (e.g. criminals, terrorists, fixated people) exploiting a vulnerability (i.e. a gap or weakness in security) to achieve their objective, thereby causing an **impact** (i.e. the amount of harm, from loss of life to financial and reputational loss).

Toren believes that security risk is subjective and unquantifiable, so we:

1. Assess security risk and its components as 'High', 'Medium' and 'Low'
2. Agreed risks and mitigations that match our clients' value judgements

7.1.1 Likelihood

Security threat is a product of the **capability and intent** of threat actors with regard to the target.

When we talk about the **likelihood** of a security threat we mean "**The probability that threat actors will succeed in making a credible attempt to attack**".

Likelihood	Description
Very Low	The event may occur in exceptional circumstances. The threat source lacks motivation and capability and is very unlikely to be successful. The implemented security controls will entirely mitigate the vulnerabilities.
Low	The event could occur in limited circumstances. The threat source lacks motivation or capability and is unlikely to be successful. The implemented security controls should significantly mitigate the vulnerabilities.
Moderate	The event could occur in some circumstances. The threat actor is motivated and capable and could be successful in an attack. The implemented security controls could mitigate the vulnerabilities.
High	The event is likely to occur in most circumstances. The threat actor is motivated and capable and is very likely to be successful. The implemented security controls do very little to mitigate the vulnerability.
Very High	The event is expected to occur in most circumstances. The threat actor is highly motivated and capable and will be successful. Security controls have either not been put in place or are extremely ineffective.

7.1.2 Impact

A successful security threat incident usually has many **different types of impacts** that could include death or serious injury, psychological harm, financial loss, damage to property, etc. When we talk about the **impact** of a security threat we mean "**the amount of harm caused by a successful attack**".

For the purposes of this Security Strategy, we have adopted a standardised impact methodology based on knowledge of the proposed use and experience on similar projects for the client.

Impact	Description
Very Low	No injuries. Financial loss of less than £100,000. No reputational harm. No lasting disruption to the use of the building. Very minor damage to assets.
Low	Injuries requiring first aid treatment. Loss or costs greater than £100,000. Minor reputational harm. Disruption to the use of the building for less than 1 day. Minor damage to assets.
Moderate	Injuries requiring medical treatment and counselling. Loss or costs greater than £500,000. Moderate reputational harm. Disruption to the use of the building for more than 1 day. Moderate damage to assets.
High	A single death or multiple serious injuries requiring extensive treatment. Loss or costs greater than £1,000,000. Major reputational harm. Disruption to the use of the building for greater than 7 days. Major damage to assets.
Very High	Multiple deaths. Loss or costs greater than £5,000,000. Catastrophic reputational harm. Disruption to the use of the building for greater than 30 days. Catastrophic damage to assets.

7.1.3 Classification

In order to assess a security risk, we combine the **likelihood** and **impact** of the associated security event to provide an overall security **risk rating**.

The following security risk matrix illustrates how, for example, an event with a very high likelihood but a very low impact would be assigned an overall security risk rating of Medium.

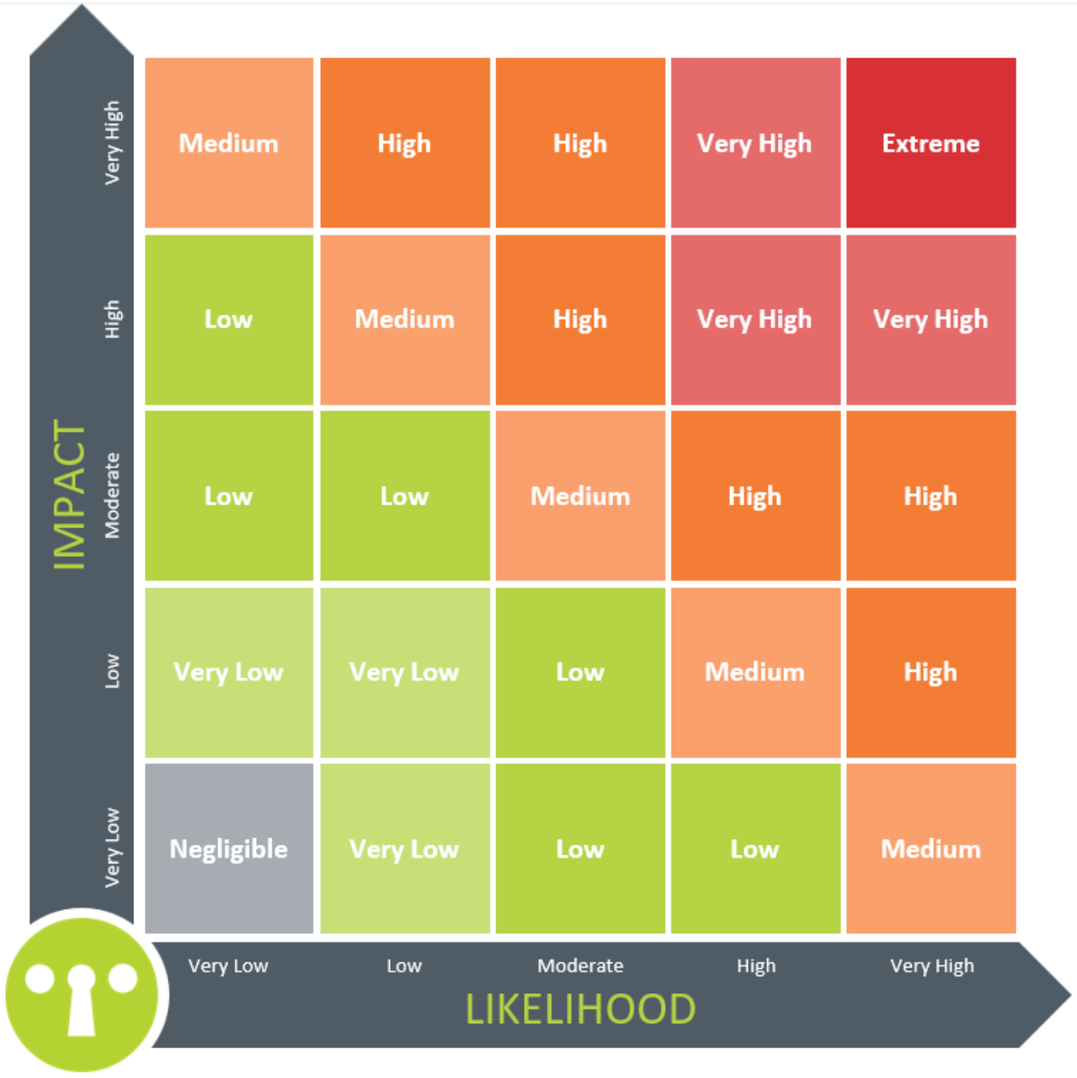

Figure 18 Security Risk Matrix (Toren)

7.2 Threat Information

In order to ensure security recommendations are informed, appropriate and proportionate, we use open-source crime information to support our assessment of risk. This includes information available from the police (where available) and third-party data outlets.

7.2.1 West Hampstead Policing Area

According to www.police.uk, the development is situated within the West Hampstead Policing area of the Metropolitan Police Service force area. This area is identified below.

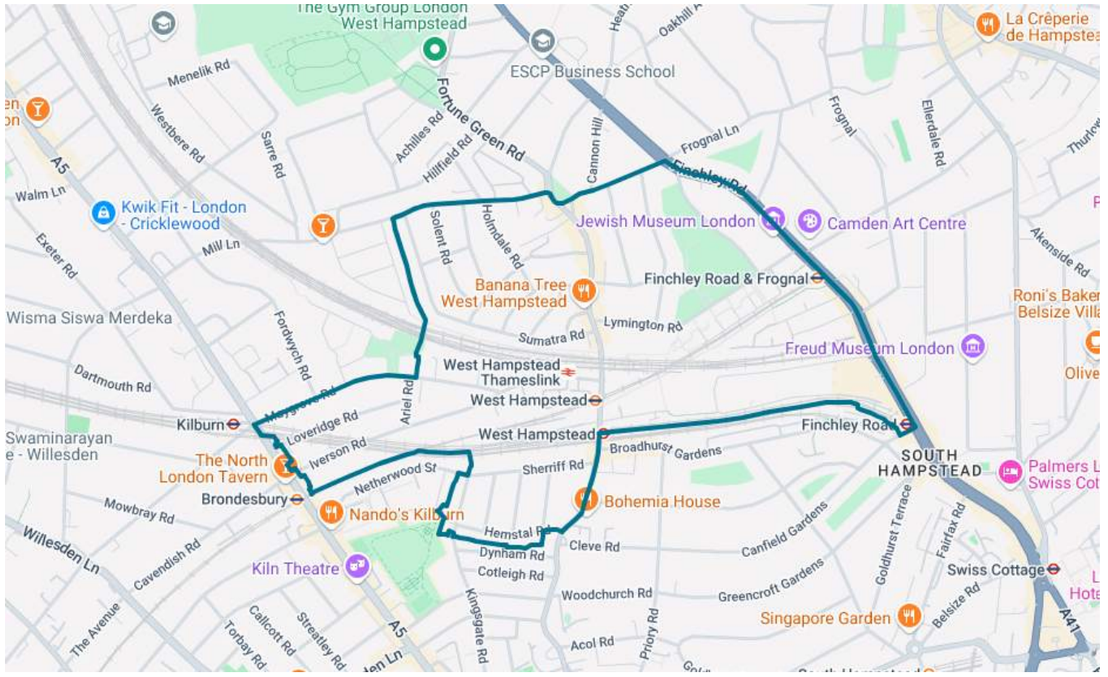

Figure 19 West Hampstead Policing Area (police.uk)

7.3 Crime Risk Assessment

7.3.1 Overview

The following sections draw on the information contained in section 7.2 and knowledge of the proposed development and its location. This section applies the methodology described in section 7.1 to evaluate the likelihood, impact and associated risk of a range of offence types.

Offence types not considered to be relevant to the proposed development, by virtue of its proposed use and the facilities it provides, will not be considered.

7.3.2 Crime Statistics

The figure below describes the volume of crime and disorder in the West Hampstead Policing area for the preceding 3 years in descending order.

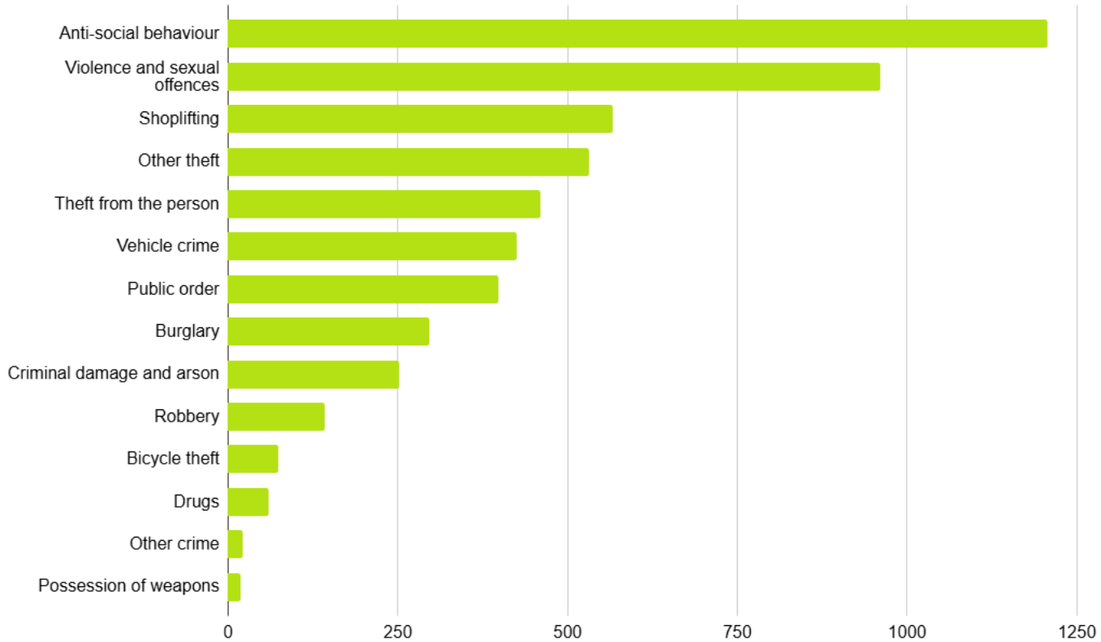

Figure 20 Crime rates within the West Hampstead Policing area (police.uk)

7.3.3 Violence and Sexual Offences

Violent crime covers a range of offence types from minor assaults, such as pushing and shoving that result in no physical harm, to murder. The category includes offences where the victim is intentionally stabbed, punched, kicked, pushed, jostled, etc. as well as offences where the victim was threatened with violence whether or not there is any injury. Sexual offences include sexual assault, unlawful sexual activity (which can involve consenting participants), grooming and indecent exposure.

An open-source review of instances of violent crime in the local area revealed incidents mostly occurred in publicly accessible environments. For example:

August 2024: **Assault**	A man in his thirties was assaulted with a scooter near Camden Market, resulting in multiple injuries. The attacker was arrested on suspicion of intent to cause grievous bodily harm.
December 2023: **Stabbing**	On New Year's Eve, a 16-year-old boy was fatally stabbed during a confrontation in Primrose Hill. A 17-year-old male admitted to the stabbing, with the trial focusing on intent and self-defense claims.
October 2022: **Assault**	A man perpetrated multiple assaults on the London Underground including one at West Hampstead station, where he allegedly struck a passenger, resulting in fractured ribs. The man was charged with multiple offences including attempted murder and causing grievous bodily harm.

During September 2024, there were 60 violent and sexual offences recorded within half a mile radius of the site (www.streetcheck.co.uk). It's possible that violent and/or sexual offences could affect the users of the development over the course of its lifetime. This may include violence towards residents, visitors or staff, though it is considered such incidents are more likely to occur outside the development (e.g. along Blackburn Road and nearby public amenity space) than within.

Based on the above and knowledge of the proposals, we have determined a risk rating of Medium.

Likelihood	Impact	Risk Rating
Moderate	Moderate	**Medium**

7.3.4 Antisocial Behaviour (ASB)

Antisocial behaviour is defined as someone acting in a manner that causes or is likely to cause harassment, alarm or distress to one or more people.

During September 2024, there were 70 ASB offences recorded within half a mile radius of the site (www.streetcheck.co.uk). The DOCO noted that ASB was common in the local area, especially within the various pedestrian pathways including Billy Fury Way, Potteries Path and Black Path. As the local area is subject to ongoing development, it is considered likely that ASB will affect the proposals to some degree over the course of its lifetime.

With the internal areas of the development being accessible to authorised persons only, it is unlikely ASB will occur within those spaces. However, this excludes the possibility of antisocial behaviour by the general public in the internal and external cafe spaces and of residents of the development behaving antisocially (either within communal areas or the external amenity spaces). Therefore, semi-private areas of the development (e.g. lobbies and amenity spaces) and the commercial space facade should be designed with natural surveillance in mind and incorporate clear stewardship, surveillance, lighting and signage.

Based on knowledge of the local factors and the relevance of this type of incident to the development, we have determined a risk rating of Low.

Likelihood	Impact	Risk Rating
High	Very Low	Low

7.3.5 Criminal Damage

Criminal damage is the intentional and malicious damage to property.

The site survey revealed various examples of graffiti on nearby and adjacent streets to the development. It is likely that this issue could spread to the proposed development. However, careful consideration to the use of landscaping, restriction of access to viable areas of the ground floor elevation (e.g. unfenestrated cladding treatments) and supporting lighting and video surveillance can all contribute to making the development less attractive to those seeking to graffiti.

The external elements of the public cafe space, including the facade and furniture may be at risk of criminal damage. Consideration will be required to determine how cafe furniture will be stored overnight to avoid criminal damage or theft.

Based on knowledge of the local factors and the relevance of this type of incident to the development, we have determined a risk rating of Medium.

Likelihood	Impact	Risk Rating
High	Low	Medium

7.3.6 Arson

Arson is the act of deliberately setting fire to property. Arson that is derived from antisocial behaviour is more likely to affect external areas of a property. However intentional setting of fires internally, e.g. by a disaffected staff member, is likely to have a higher impact.

The likelihood of arson affecting the residential uses of the development is considered to be very low. However, there are recent examples of student accommodation developments being targeted by arsonists (both confirmed and suspected). For example, the 2023 fire at Henderson Old Hall, Newcastle upon Tyne, and the 2016 fire at Mossley Hill, Liverpool.

Based on knowledge of the local factors and the relevance of this type of incident to the development, we have determined a risk rating of Medium.

Likelihood	Impact	Risk Rating
Very Low	Very High	Medium

7.3.7 Opportunist Theft

Opportunist theft takes place when a criminal in a legitimate location knows or assumes the presence of a portable valuable item and can readily observe a security vulnerability. The development may be vulnerable to opportunistic theft in the areas open to or easily accessible to the public such as the cafe space, or where visitors are invited, such as the external amenity spaces on upper levels, and the internal function of the commercial showroom.

The intent of opportunistic thieves can generally be considered to be low, as they are typically unwilling to put themselves at significant risk of being caught while entering or within a property. The capability of opportunist thieves is also considered to be low, as they are usually unwilling to carry tools that could be considered as ‘going equipped’.

Opportunities for removal of CRAVED items (refer to 7.2.2) may easily present themselves in environments where mixing of the public takes place, and victims may be otherwise engaged or distracted, such as in cafe settings or browsing in the commercial showroom space. However, the

recommended controls described in section 9 (namely internal furniture layouts, video surveillance and access control) seek to minimise opportunity and provide a degree of deterrence to such activity.

The risk of opportunist theft has therefore been deemed to be Low.

Likelihood	Impact	Risk Rating
Moderate	Low	Low

7.3.8 Deception Theft

Deception theft is more commonly associated with residential properties, where elderly and vulnerable groups are typically targeted. Similarly to opportunist theft, the use of deception to enter premises is often seen as a lower risk on the part of the criminal. Commonly reported examples include criminals posing as services engineers or the authorities to convince residents to allow them access to their residence.

The PBSA lobby will be supervised by concierge staff during the day time, which will limit the risk of deception theft. Consideration should be given to mitigation strategies outside of staffed hours and for the affordable housing section of the development.

Due to this, the risk of this issue affecting the development is deemed to be Very Low.

Likelihood	Impact	Risk Rating
Low	Low	Very Low

7.3.9 Targeted Theft

Developments are known to be targeted by professional, organised criminals for intrusion and theft if they are perceived to contain high-value items.

Targeted theft is more likely to be planned, including reconnaissance of the property, and to be carried out by skilled and experienced attackers with access to a wide range of mechanical, electrical and electronic tools and even vehicles and willingness to harm occupants if required.

Targeted theft typically occurs at a time when there is a reduced likelihood of being detected or apprehended. In an apartment setting, this is often during the day, but for commercial uses could be more likely to be outside of the business' operating hours when the facility is vacated.

Targeted theft in a residential context is typically aimed at dwellings known to contain CRAVED assets (which represent a high reward), and/or linked to theft of vehicles. This type of theft also has the potential to manifest in relation to the proposed commercial use. However, this will be highly dependent on the profile of the tenant(s) and the nature of the assets to be held on the premises. The commercial showroom has the potential to accommodate uses that can be attractive to thieves (e.g. such as retail and associated potential for shoplifting), exacerbated by its direct access off Blackburn Road.

The security recommendations described in section 9 will contain tiered measures, such that an appropriate degree of protection can be adopted subject to the anticipated use and/or desired occupier profile. However, the mitigation of certain risks (e.g. robbery during hours of operation) will be largely dependent on the fit-out of the commercial space and associated management practices.

In consideration of the above, the risk of targeted theft has been deemed to be Medium.

Likelihood	Impact	Risk Rating
Moderate	Moderate	Medium

7.3.10 Public Order

Public Order offences are defined as crimes that involve acts that interfere with the operations of society and the ability of people to function efficiently.

Open-source research of instances of protest in the local area revealed one recent incident of public order disruption as outlined below:

October 2024: **Pro-Palestinian Protest**	A conference at the JW3 Jewish community centre in West Hampstead was met with protests from a group of activists. Approximately 60 protesters chanted anti-Israel slogans, leading to confrontations that left several attendees distressed. Jewish leaders condemned the protest as antisemitic and intimidating.

Despite this example of protest activity being in close proximity to the site, there is no evidence to suggest that the development will be a target for such activity.

Based on the assessed likelihood and impact, the risk resulting from public order is deemed to be Very Low.

Likelihood	Impact	Risk Rating
Low	Low	Very Low

7.4 Terrorism Risk Assessment

This section explores the most credible terrorist attack methodologies deemed applicable to the development. It will outline the factors that contribute to an attractive and viable target, and the characteristics of each attack methodology. Using that information, a likelihood, impact and risk rating will be established which can be used to determine appropriate and proportionate mitigation measures.

In summary, we have assessed the likelihood of direct terrorist attacks towards the development as being very low. It is considered the security controls described in section 9 provide proportionate, incidental mitigation against the threat types described in the following subsections.

7.4.1 Vehicle as a Weapon (VAW)

Vehicle as a Weapon (VAW) attacks involve deliberately driving a vehicle:

- at an individual or into crowds of people to cause harm; or
- into infrastructure to damage or disrupt its operation, a site/event, or critical services /supplies.

Terrorist attacks involving the use of vehicles as a weapon against Western targets have increased in popularity over recent years as a method of attack because it is low complexity, affordable, requires little skill and planning and is likely to cause multiple casualties. Furthermore, there is a relatively low likelihood of a VAW attack being detected in the planning phase.

VAW attacks are frequently the first phase of a 'layered attack', i.e. one beginning on public roads with little or no warning and often followed by a Marauding Weapons Attack (MWA, see section 7.4.2) using bladed weapons, firearms or fire as a weapon.

However, there is no known direct threat of this nature to the proposed uses which form Ilderton Wharf, and attacks in the UK in recent history have been aimed at more symbolic locations (Westminster Bridge and London Bridge, 2017) or targets based on religious or ideological motives (e.g. Finsbury Park Mosque in 2017).

The likelihood of a direct attack targeting the development is therefore considered to be very low. The likelihood of an attack at nearby locations (such as the West Hampstead underground station) which may have an indirect impact on the development is also considered to be very low.

Attack type	**Likelihood**	**Impact**	**Risk Rating**
Direct	Very low	Very High	**Medium**
Indirect	Very low	Low	**Very Low**

7.4.2 Marauding Weapons Attack (MWA)

Marauding Weapons Attacks (MWA) involve perpetrators moving through an environment seeking to kill or injure as many people as possible and can be initiated very quickly, leading to a significant impact before a capable response arrives at the scene.

MWAs can be carried out by individuals or groups, and often form part of a multi-phase attack alongside other tactics such as Vehicle as a Weapon (VAW, refer to section 7.4.1) and Person-Borne Improvised Explosive Devices (PBIED, refer to section 7.4.3).

Terrorist attacks in the UK have recently displayed a trend of using manual weapons (knives or improvised weapons based on tools) and using a vehicle as an initial weapon from which to launch the attack (e.g. the 2017 attack at London Bridge began using VAW and developed to a MWA as the activity moved to Borough Market). However, a terrorist attack based on the use of firearms remains unlikely in the UK due to the relative lack of availability of firearms and ammunition compared to mainland Europe and the United States.

Targets often include crowded places such as leisure destinations and public transport infrastructure, as they are often afforded limited protective security controls and provide the potential for mass casualties.

Due to the development being largely of a private nature, it is considered that it would not represent an attractive target at which to carry out this type of attack.

Therefore, the likelihood of a direct attack is considered to be very low.

The likelihood of an attack at nearby crowded locations (such as local train stations) is considered to be marginally higher. However, it's considered such incidents would have a very low impact on the development.

Attack type	**Likelihood**	**Impact**	**Risk Rating**
Direct	Very low	Very High	**Medium**
Indirect	Low	Very low	**Very Low**

7.4.3 Person-Borne Improvised Explosive Device (PBIED) Attack

A Person-Borne Improvised Explosive Device (PBIED) is a portable weapon carried by the attacker and often comprises explosives and additional metal fragments to maximise its impact.

Like MWA, perpetrators of PBIED attacks often target crowded places such as leisure destinations (e.g. the 2017 Manchester Arena attack) and public transport infrastructure (e.g. the 2005 London bombings on Underground and Bus networks), as they are often afforded limited protective security controls, provide the potential for mass casualties and attackers are able to blend in with their surroundings until they are ready to carry out their attack.

The development is not aligned with the profile of historic targets for PBIED. Therefore, the likelihood of a PBIED attack towards the development directly is considered to be very low.

The likelihood of an attack in the local area is also considered to be very low with a minimal impact on the development's operations.

Attack type	**Likelihood**	**Impact**	**Risk Rating**
Direct	Very low	Very High	**Medium**
Indirect	Very Low	Very Low	**Negligible**

7.4.4 Vehicle-Borne Improvised Explosive Device (VBIED)

A Vehicle-Borne Improvised Explosive Device (VBIED) is concealed within a vehicle and transported to a target location and detonated.

The defining features of a VBIED attack and its impact on a target building or piece of infrastructure include the blast emitted, fragmentation of materials and shock.

VBIED attacks are logically more difficult to plan and coordinate due to the quantities and availability of materials needed to assemble a viable device. This is due to the increased likelihood of being detected during the planning phase owing to regulations surrounding component materials (e.g. fertiliser) as well as availability (e.g. solid explosives are less common in the UK than in other territories).

VBIED attacks may also form part of a multi-phase attack alongside other tactics such as Vehicle as a Weapon (VAW, refer to section 7.4.1), as was the case with the 2007 attack at Glasgow Airport during which, notably, security controls at the facility limited access to the assailant vehicle and the explosive devices failed to detonate as intended, highlighting the difficulty of deploying this method of attack.

Although recent terrorist attacks have been based on easier-to-achieve methods such as MWA and VAW, terrorists continue to aspire to create maximum casualties and media impact through spectacular attacks on prominent locations.

However, it is considered the development is not aligned with the scale and profile of such locations. Therefore, the likelihood of a VBIED attack towards the development directly is considered to be very low. The likelihood of an attack in the local area is also considered to be very low.

Attack type	**Likelihood**	**Impact**	**Risk Rating**
Direct	Very Low	Very High	**Medium**
Indirect	Very Low	Low	**Very Low**

7.5 Effects on the Existing Community

It is considered the development is expected to contribute positively to the area. The reasons for this are described further below, in relation to crime and terrorism respectively.

7.5.1 Crime Effects

For the reasons described in section 4.1, the proposed development will contribute to the immediate area by introducing increased levels of legitimate activity, and providing an active frontage along Blackburn Road. Furthermore, the development will seek to improve the quality and useability of the space directly adjoining Granny Dripping Steps for the benefit of both users of the development and the wider community.

The proposals will complement the wider activity mix (e.g. generated by local residential and commercial uses) and introduce opportunities for natural surveillance and legitimate activity along Blackburn Road through the introduction of public cafe, commercial and residential uses.

7.5.2 Terrorism

The likelihood of a terrorist attack targeting the site directly has been assessed as being very low and, with due regard to the JASPAR principles (see section 8.2.4), is not considered sufficiently high to warrant any specific/specialist preventative measures beyond the controls described in section 9.

Therefore, we have assessed the potential effects on the existing community in regards to terrorism as negligible. Whilst the impact to the community from a terrorist attack on the proposed development would be high, we have assessed the likelihood of such an event as being very low.

8 Security Strategy

8.1 Security Objectives

The Security Objectives described below seek to:

1. Categorise the various influencing factors into clear statements that can be addressed through security design and operating procedures.
2. Ensure security needs and project constraints are understood before solutions are considered.
3. Form the basis for the specification of Security Controls.

The Security Objectives are intended as a succinct summary of the needs of the development and form the basis of subsequent security recommendations.

- **To provide security features that support the operation of a residential-led mixed use development providing an appropriate degree of security for residents, visitors, tenants and staff whilst maintaining a welcoming environment.**
- **To provide security that is both appropriately visible (to assert a security posture and provide deterrence) without being unduly imposing (i.e. high levels of fortification disproportionate to the established risk).**
- **To provide a safe environment for building users such that the security risk to them is 'as low as reasonably practicable' based on 'reasonable worst-case' security threats and adopted security concepts.**
- **To facilitate the effective management of the site, with only authorised people being granted access to appropriate spaces.**
- **To provide the above against the identified Design Basis Threats (see section 8.4).**

The Security Objectives will be satisfied through a balanced combination of security controls spanning the following thematic areas:

1. Spatial planning i.e. the design and orientation of built structures, external areas and movement routes and associated features. This is often referred to as Crime Prevention through Environmental Design (CPTED).
2. Technical measures i.e. electronic controls (such as access control and video surveillance) and physical controls (such as doors and windows).
3. Operational security e.g. the day-to-day management of the development by onsite and/or remote personnel, together with supporting policies and procedures.

8.2 Security Concepts

The following security concepts have been adopted to guide the formation of recommended security controls to ensure that they:

1) Are appropriate and proportionate;
2) Represent good value for the client; and
3) Complement the development design intent.

8.2.1 CPTED & Defensible Space

Crime Prevention through Environmental Design (CPTED) is a theory focusing on the strategic design of the built environment, which when applied, has shown to be capable of supporting a reduction in crime and the fear of crime. An objective of CPTED is to reduce opportunities for offenders to commit crimes, and simultaneously promote positive interaction with the built environment by legitimate users. The components of CPTED are:

Natural Access Control: Natural access control guides how people enter and leave a space through the placement of entrances, exits, fences, landscaping and lighting. It can decrease opportunities for crime by denying criminals access to potential targets and creating a perception of risk for offenders.

Natural Surveillance: Natural surveillance guides the placement of physical features such as windows, lighting and landscaping. These features affect how much can be seen by occupants and passersby. Potential criminals are unlikely to attempt a crime if they are at risk of being observed. Similarly, we are likely to feel safer when we can see and be seen.

Territorial Reinforcement: Physical design can create an area of territorial influence that can be perceived by and may deter potential offenders. Examples include defined property lines and clear distinctions between private and public spaces. Territorial reinforcement can be created using landscaping, pavement designs, gateway treatments, signs and fences.

Maintenance: A well-maintained development creates a sense of guardianship and deters criminals.

Activity Support: Criminal acts can be discouraged in public spaces when we encourage activities in those spaces by legitimate users.

Often considered an additional component of CPTED, 'Defensible Space' is a term used to describe an environment where certain physical characteristics (e.g. boundary definitions, materiality, signage) allow legitimate users to assert influence, ownership and control to ensure their security, where misuse of space is more likely to be deterred.

8.2.2 Routine Activity Theory (RAT)

This theory considers crime likely to occur when three principle variables are true, those being:

1. The presence of a capable/motivated offender;
2. The presence of a target (or asset); and
3. The absence of a suitably deterring presence.

Prevention of crime therefore requires the removal of one or more of these variables. For example, targets can be made less suitable (relocated, or more protected) and capable guardians (such as staff, management personnel or security guards) can be installed.

8.2.3 CRAVED

This crime prevention concept sets out the attributes of assets most likely to be targeted by thieves and therefore helps to identify areas of development that warrant further protective measures. Only one of the attributes needs to be present to make an asset attractive, but the more attributes that apply, the greater the attractiveness of the asset.

CRAVED assets are:

- **C**oncealable
- **R**emovable
- **A**vailable
- **V**aluable
- **E**njoyable
- **D**isposable

8.2.4 JASPAR

This concept is designed to assist in the identification of appropriate and proportionate counter-terrorism security controls but is equally applicable to security controls in general.

JASPAR is based on the premise that security controls must be shown to satisfy each of the guiding attributes, otherwise the proposed control may be considered inappropriate and/or disproportionate.

JASPAR controls are:

- **J**ustifiable
- **A**chievable
- **S**ustainable
- **P**ractical
- **A**ffordable
- **R**easonable

8.2.5 Deter, Detect, Delay

Deter, Detect and Delay (in addition to Mitigate and Respond) are principles advocated by the National Protective Security Authority (NPSA) on the premise that security controls can only be effective if the various types of controls proposed at each layer of defence are considered complementary to each other during the formulation of a solution. The principles comprise:

Deter - Controls designed to discourage, frustrate and/or displace an attack.

Detect - Controls designed to identify and verify an attack, then trigger a capable response.

Delay - The use of performance-rated physical security controls to prolong an attack.

Mitigate - Measures are taken to limit the impact of an attack, thereby reducing risk.

Respond - Intervention is designed to curtail an attack and/or apprehend the attackers.

Critical to this methodology is an understanding of the layers of security applicable to a development (i.e. the concentric points at which security controls may be deployed). Typical layers are summarised in the diagram below, and apply to the following controls:

- Electronic Security Controls including intruder detection, video surveillance and access control to alert responders to threats
- Physical Security Controls including fences, vehicle barriers, walls, doors and safes to deny or delay threat actors reaching their targets
- Operational Security Controls including procedures, monitoring, patrolling and response.

Figure 21 Layering of security measures (Toren)

An effective combination of security controls is one that provides a greater physical delay to the attacker than the sum of the time to detect the attack and for a response to arrive.

Figure 22 Time to delay and detect an intruder should be less than time to respond (Toren)

As such detection of a threat actor as early as possible allows the maximum time for a response to arrive and intervene before the physical measures can be compromised.

8.2.6 STAVE

This methodology, devised by the Building Research Establishment (BRE), describes the principles which underpin the selection of appropriate physical security standards for use in mitigating risk; specifically in providing the element of 'delay'. STAVE is based on the premise that performance standards applied to physical security controls must adhere to the following traits:

Scope - The control type must fall within the scope of the standard selected.

Threat - The standard should be threat-based (as opposed to design-based).

Available - The standard must be available from the issuing organisation.

Verifiable - It must be possible to verify a control's approval to the standard.

Easy - The standard can be easily understood and interpreted by a range of disciplines.

Key to applying the STAVE methodology is an understanding of what a given security control is required to do (i.e. its performance attributes). Factors which influence this are listed below.

Threat Actor Characterisation

Different standards use various parameters in order to provide a range of performance options, but in general, they usually consider the following to varying extents:

- Training and experience e.g. novice and knowledgeable
- Toolsets, e.g. concealed tools, readily available tools, specialist entry tools, heavy tools
- Total attack time, e.g. 1, 3, 5, 10, 20, 60 minutes

Examples against which products are specified could include; 'a novice attack for 10 minutes using basic hand tools' or 'a knowledgeable attack for 3 minutes using heavy construction tools'.

Overt and Covert Attacks

Attack resistance standards can also, explicitly or implicitly, categorise threats into overt and covert. Overt threat actors are relatively unconcerned about noise and damage leading to detection, whilst covert threats prefer to avoid detection.

Overt attack test standards therefore often allow a lot of noise to be generated, as the toolsets that they permit allow for a greater amount of damage to the building fabric. Covert attack test standards assume that the attacker will rely on stealth, technical ability and minimising obvious damage.

8.3 Security Response Times

The following table indicates 'reasonable worst-case' response times to an incident. Response times for the building occupiers may vary depending on the time of day, security systems used and the attack type. Response times for police and security providers can be affected by several factors including the location of resources at the time of an incident, other incidents occurring at the same time, traffic, etc.

Responder	Actions	Notes	Response Time
On-Site Staff Response (During cafe and commercial use operating hours, in these demises only)	Time to notice visually or via security systems then investigate and respond to an incident.	Assumed to be provided by concierge or occupiers on the commercial uses.	**2 minutes**
Off-Site Management Response (Residential uses, if provided)	Time to receive notification from on-site personnel or remote security monitoring facility then assess, mobilise and travel.	Response time depends on service level agreement, location at the time of call-out, traffic and similar factors.	**40 minutes**
Off-Site Security or Keyholding Response (Commercial and industrial uses only, if provided)			
Local Police ('Priority 2', non-life threatening)	Time to receive a call from on-site or off-site security then assess and mobilise.	Approximation based on FoI data.	**1hr 08 minutes**

*Response times are estimated.

8.4 Design Basis Threats

Based on the security risks described in section 7, the following table focuses on the 'reasonable worst-case' security scenarios that are proposed for specifying security controls. These are referred to as the 'design basis threats' (DBTs) for the performance specification of Security Controls.

The table below seeks to quantify the capability and intent of the perpetrator (i.e. single or multiple, and novice or experienced) as well as their tendency to operate overtly (employing methods involving noise, unconcerned about detection) or covertly (employing methods involving minimal noise, seeking to avoid detection).

Category	Reasonable Worst-Case Threat(s)	Attacker Profile	Overt or Covert
Violence and Sexual Offences	Verbal or physical assault of residents, visitors, staff or tenants entering, leaving, or in close proximity to the development.		
ASB	Use of the publicly accessible areas of the development by individuals seeking to graffiti, congregate, or consume drink or drugs.		
Criminal Damage	Acts of damage to accessible areas of the development's facade, landscaping, external mail facilities and communal areas.		
Arson	Deliberate act of setting fire to parts of the premises, possibly by an individual with legitimate access.		
Opportunist Theft	Discreet removal of items from publicly accessible areas of the development (e.g. cafe).		
	Discreet removal of product items from the commercial showroom.		
Deception Theft	Removal of items (such as unsecured postal deliveries) from within the residential buildings by individuals posing as residents, couriers or contractors.		
Targeted Theft	Forced entry to individual apartments within the PBSA or affordable residential uses by non-residents having gained access by deception or tail-gating.		
	Concerted, forced entry to the commercial showroom out-of-hours using high impact manual tools with the potential for powered cutting tools.		
Public Order	Minor disruption to access and/or operations due to protest activity or indiscriminate rioting in the local vicinity.		

Key:

 Single novice perpetrator

 Single experienced perpetrator

 Overt

 Multiple novice perpetrators

 Multiple experienced perpetrators

 Covert

8.5 Secured by Design (SBD)

8.5.1 SBD in Planning

At the time of publication of this Security Strategy, the associated planning application for the development had not yet been submitted to the local planning authority.

Based on an examination of another, recently approved major development at Chalk Farm, it was observed that 'Secured by Design' related planning conditions are applied by the local planning authority. An application granted permission in 2024 included the following condition:

Prior to occupation, evidence that the plans can achieve Secured by Design accreditation must be submitted to and approved in writing by the local planning authority in consultation with the Designing Out Crime Officer.

Furthermore, during the DOCO consultation meeting the client was advised by the DOCO that, if formally consulted on the planning application, the Metropolitan Police would be likely to request a planning condition requiring the achievement of Secured by Design certification.

Therefore, the DOCO's advice relating to Secured by Design was considered and incorporated as appropriate within the security controls described in section 9. This advice is summarised in Section 6, and the minutes of the discussion are presented in Annex C.

It was also noted that a recent planning application for a mixed use development in the area (planning ref 2022/0528/P) had been objected to at planning consultation stage by the police DOCO. The reasons for the objection included the DOCO's perceived lack of integration between the proposals and existing public movement routes including Billy Fury Way and Granny Dripping Steps, and this being contrary to national and local planning policy.

8.5.2 About Secured by Design

Secured by Design (SBD) is a UK police initiative aimed at improving the security of buildings and their surroundings to reduce crime. The scheme sets out standards and guidelines that developers and manufacturers must meet to achieve certification to the scheme (sometimes referred to as 'accreditation').

The specific requirements for any given development to achieve Secured by Design certification are confirmed by the local Designing Out Crime Officer (DOCO), who often also acts as a non-statutory consultee during the planning application consultation process.

SBD can be applied to residential developments and commercial developments, and there are three levels of certification available:

Level	Summary of Requirements
Gold	This level incorporates the security of the external environment together with the physical security specification of the development
Silver	This level offers those involved in new developments, major refurbishment and the individual the opportunity to gain certification for the level of physical security provided (excludes the external environment).
Bronze	This level offers a route to achieve a level of physical security for bespoke or refurbished properties where traditional, enhanced security products are not available/compatible, or cannot be utilised due to the listed building or other conservation status.

The SBD guidance applicable to 14 Blackburn Road (current at the time of publication of this Security Strategy), is 'Secured by Design Residential 2025: Edition 1' and 'Secured by Design Non-residential 2025: Edition 1'.

A copy of this guidance can be found by visiting www.securedbydesign.com.

9 Recommended Security Controls

9.1 Preface

The aim of the security controls is to respond to the findings of the security risk assessment detailed in section 7 in accordance with the security objectives and concepts outlined in section 8. The recommendations are based on the proposals detailed in the documentation listed in the Document Register. Any changes to those proposals (e.g. design development) may result in the need for revisions or additions to the recommendations listed.

Note: A checkbox column has been included for the Design Team to track progress in meeting the recommendations and associated BREEAM assessment criteria over the course of the project. Where prevailing or statutory requirements could restrict the adoption of certain security recommendations, it is recommended Toren is re-engaged to review alternative options.

The following considerations have informed the development of these recommendations:

9.1.1 Applicability of Part Q (and Approved Document Q)

Approved Document Q (ADQ) does not define the term 'dwelling' (other than constituting a new 'house' or 'flat'). As such, the applicability of Part Q to purpose built student accommodation is uncertain. We therefore sought advice from Secured by Design, the Official UK Police Security Initiative, a body whose guidance is explicitly referred to as a source of further information in Approved Document Q.

Their guidance states:

"If the accommodation provided is clustered into groups of bedrooms served by a shared front entrance doorset (similar to that of an apartment) then Part Q is applicable. However, if the bedrooms are located off a shared/common hallway then such developments fall outside the scope of Part Q."

Based on the guidance provided by Secured by Design, Part Q should apply to the proposed development as described below:

Feature	Assessment	In Scope?
Studios entrance doors	Due to the studios' accessibility off a shared/common hallway, studios are considered to fall outside the scope of Part Q.	No
Ground floor doors and windows	Due to the 'Twodios' being deemed to fall within scope of Part Q, ground floor doors and windows permitting access to those areas of the building are also considered to fall within the scope of Part Q.	Yes

Furthermore, the police DOCO has indicated that studio entrance doorsets would not need to be certified to PAS 24 in order for the development to meet the requirements of Secured by Design certification, subject to access to each floor being controlled off the lift lobbies.

However, Toren recommends that, as a minimum, studio entrance doorsets should be designed and specified to meet the requirements of Building Regulations Requirement Q1.

This is because we consider PBSA living accommodation to function like dwellings, on the basis that:

- Students inhabit them for the majority of the year as their primary residence, similarly to any residential apartment.
- Whilst a concierge will be present during the day time, the PBSA will operate identically to the C3 Affordable Housing (which is subject to Part Q) outside of these hours.

Section 9.2.2 describes our minimum recommendations in this regard.

9.1.2 Proportionality & Balance

All recommendations will be commensurate with the assessed likelihood and impact of a security incident. In addition, recommendations will incorporate an appropriate emphasis on physical, technical and operational security, as suited to the development. This is important to avoid an over-reliance on one type of solution, and to take advantage of the benefits that each of the three components offers.

9.1.3 Secured by Design

It is possible that certain recommendations within this report may differ from advice provided by the DOCO. Any material deviations between our recommendations - and advice received from the DOCO that may form the basis of Secured by Design certification requirements - will be highlighted for clarity.

In such scenarios, the applicant may adopt the advice of the DOCO in order to satisfy the associated recommendation(s) of this report. This helps to ensure the achievability of the BREEAM HEA 06 Security credit in instances where SBD certification is also being targeted.

Applications for SBD certification can be made directly to the local police force, or on the client's behalf by Toren.

9.2 Public Realm

The project team have identified the external public realm as instrumental in both:

1. Accommodating an increased pedestrian flow along Blackburn Road (in anticipation of further, extensive development to the east of the site); and
2. Ensuring the safety and security of residents, tenants, and members of the local community using the development.

The footpath along Blackburn Road will be widened, and accommodated by a shallow recessing of the street level facade. The proposed design features no columns or other obstructions which could impede natural surveillance, lighting or video surveillance schemes, whilst the height of the recessed area is considered sufficient to avoid the creation of a sheltered area susceptible to crime or ASB.

The proposed public realm to the east (providing an approach to the PBSA entrance lobby and to facilitate external seating for the cafe) will be sensitively designed so as to integrate with the existing Granny Dripping Steps. This will serve to support levels of personal safety and security to users of the steps, by introducing legitimate uses to the space and the natural surveillance this brings.

This section describes the recommendations relating to the aforementioned external areas of the development for adoption in future design stages.

Ref	Recommendation	Function	Purpose	X
9.2.1	The public realm to the east will be publicly accessible at all times of the day (i.e. it is not intended for this space to be fenced/gated). Therefore, any seating or street furniture provided in this location should be removable, enabling it to be stored internally (in the cafe) during adverse weather and overnight. Any hard landscaping features should avoid the creation of surfaces that could attract unwanted gathering, ASB or rough sleeping. This may be achieved through limiting the inclusion of such elements, or designing them strategically to make them suitable for short-term use.	To ensure seating is not susceptible to damage or attract unwanted gathering/ASB.	To encourage legitimate use of the area and reduce the likelihood of ASB or rough sleeping, occurring.	☐
9.2.2	It is recommended that the public realm to the east incorporate features implicit of a transition from public space to privately managed space (e.g. surface treatment transitions, development-specific signage or landscaping features). In addition, the space should be configured to enable any outdoor cafe seating to be contained by temporary cafe canvas barriers (or similar).	To reinforce ownership of the space. To provide personal space to cafe users seated outside and distance passersby from tables.	To deter improper use of the space by increasing the perception of being observed. To reduce opportunity for theft of personal belongings from customers.	☐
9.2.3	Provide uniform lighting to the Blackburn Road footpath and the public realm to the east, in accordance with BS 5489. **SBD Note: SBD guidance requires that lighting schemes are assessed by Competent Lighting Designers[2] to ensure they meet the required standard.**	To provide conditions which support natural surveillance.	To deter/prevent ABS or other criminal behaviour in external areas.	☐
9.2.4	Provide a fence, railing or similar treatment (with gate for maintenance or escape access, if required) preventing access along the southern and western elevations from the public realm to the east and Blackburn Road respectively. It is recommended these treatments be a minimum height of 2.1m. Any emergency hardware on the internal face of these gates should be suitably shrouded so as to prevent them being operated through the fence apertures using everyday implements.	To restrict access to the channel along the south elevation of the building, and keep public activity in designated, well-overlooked areas and off the TfL tracks.	To reduce the likelihood of ASB or rough sleeping or criminal behaviour occurring in this otherwise secreted location.	☐

[2] Lighting requirements are specific to the nature of the space. A suitably qualified lighting designer can assist in interpreting these requirements and evidencing conformity to the standard. Refer to http://lightingjournal.org.uk/directory/ for details of Consultant Members of the Institute for Lighting Professionals.

Ref	Recommendation	Function	Purpose	X
9.2.5	Landscaping within the public realm should be designed to support natural surveillance with: 1. Trees specified and maintained to ensure canopies are maintained at a height of no less than 2m. 2. Shrubs specified and maintained to not exceed circa 1m in height.	To enable clear lines of sight around the building.	To reduce areas of concealment and associated opportunities for criminal behaviour.	☐
9.2.6	Owing to the high concentration of graffiti on and local to Granny Dripping Steps, it is recommended that an anti-graffiti coating is applied to the ground floor facade along the eastern elevation (including cladding, glazing into the cafe and the substation doors). The task of applying this coating may either be carried out as part of the construction works or delegated to the management company following the first occupation of the building, as such coatings typically require regular re-application to remain effective.	To create a protective surface on external elements of the building.	To enable rapid and easy removal of graffiti on the external elements of the site.	☐

9.3 PBSA (including Cafe)

9.3.1 Design & Layout

Notes:

a. SBD Residential 2025 recommends a maximum capacity of 70 cycles per storage area. However, the DOCO did not raise the proposed capacity as a concern and Toren has not identified any reason to reduce the volume of cycles per store. Therefore, we are not recommending sub-division of the cycle store beyond what is shown in the drawings.
b. Certain recommendations may fall outside of the cafe basebuild provision and be captured by the fit-out scope. In these instances, these recommendations should be treated as informatives only.

Ref	Recommendation	Function	Purpose	X
9.3.1.1	Provide mailboxes and a parcel storage facility[3] in the PBSA lobby to allow deliveries to be deposited by couriers. It is recommended that the parcel storage facility is generously-sized (i.e. based on anticipated parcel volumes at peak times of the year) and that parcel retrieval by residents is integrated with the access control system (or similar, such as proprietary smartphone app).	To facilitate the secure delivery of parcels pending collection by residents. To minimise the likelihood of parcels being left in vulnerable locations.	To ensure a sustainable post management function capable of reassuring residents and minimising opportunity for persistent theft of mail.	☐
9.3.1.2	Restrict any use of etching or graphics to the ground floor glazing (e.g. to below 1m in height) so to optimise visibility from the PBSA lobby and cafe over Blackburn Road and towards Granny Dripping Steps.	To allow natural and formal surveillance to occur unimpeded.	To reassure both building users and passersby, whilst aiding the identification of illegitimate behaviour.	☐
9.3.1.3	Position internal cafe furniture local to the glazed frontages to Blackburn Road and Granny Dripping Steps so as to encourage fixed sources of natural surveillance over the public realm.	To maximise opportunity for natural surveillance from the lobby.	To reassure both building users and passersby, whilst aiding the identification of illegitimate behaviour.	☐

[3] Explore integrating parcel storage accessibility with resident access control tokens.

9.3.2 Physical Security

Note: We recommend that the design team adopts a single-leaf or sliding doorset for external communal entrance doors (i.e. those operating on access control). Double-leaf door configurations are often less compatible with the types of locking systems typically suited to PAS 24 performance levels, and as such market availability of such configurations is known to be limited.

Ref	Recommendation	Function	Purpose	X
9.3.2.1	Provide doorsets certified to PAS 24[4] to the following locations: a. Main external PBSA entrance door. b. Door leading to PBSA lobby. c. External doors leading into the public cafe space. d. Internal PBSA cycle store door. e. External escape doors. f. External bin store door. Care should be taken to ensure that all aspects of the doors' configuration (e.g. locking systems, escape hardware) are suited to the door's intended operation and form part of the scope of certification.	Products certified to PAS 24 provide at least 3 minutes of delay against covert forced entry using bodily force and concealable tools.	To provide a basic level of deterrence/delay to attempted forced entry to these building entrance points for the purposes of burglary or other activity.	☐
9.3.2.2	Provide individual studio entrance doorsets that are at least 'manufactured to a design shown by test to meet the requirements of PAS 24'. Alternatively, individual studio entrance doors may be certified to PAS 24[4]. Care should be taken to ensure that the necessary aspects of the doors' configuration (e.g. locking systems, escape hardware) are suited to the door's intended operation and form part of the supporting test data or scope of certification (as applicable).	Products tested to PAS 24 provide a degree of assurance over resistance to forced entry using bodily force and concealable tools.	To provide a basic level of deterrence/delay to attempted forced entry to individual studios.	
9.3.2.3	Individual studio entrance doors should be fitted with: a. A door viewer; and b. A door chain or opening limiter.	To enable activity outside the entrance door to be observed, and for the door to be opened whilst maintaining a degree of protection.	To enable identification of guests or suspicious activity. To guard against suspicious or deception callers.	☐
9.3.2.4	Ground floor glazing[5] (within doors and curtain walling) should meet the requirements of EN356 P1A or above.	To provide glazing with a resistance to physical attack consistent with PAS 24.	To provide a basic level of deterrence/delay to attempted forced entry.	☐
9.3.2.5	Provide cycle racks to the cycle store which allow both two wheels and the frame of a bicycle to be secured using the bicycle owner's preferred locking system(s).	To enable bicycles to be suitably secured when stored.	To reduce opportunities for bicycle theft.	☐
9.3.2.6	Where individual studio entrance doors are fitted within lightweight (e.g. stud frame) walls, the wall should incorporate a 'resilient'[6] layer to the full height, and 600mm either side of the doorset. **SBD Note: SBD guidance advocates a similar treatment to be applied to all party walls between studios. However, the DOCO has not specifically recommended this, and Toren would not advocate it based on proportionality.**	To provide a robust curtilage to each individual residential unit from communal space.	To deter and/or delay attempts to gain access to internal door hardware via communal walls.	☐

[4] These doorsets may also be certified to LPS 2081 Security Rating B, which is generally considered to have similar forced-entry performance to PAS 24, including within SBD and ADQ guidance.

[5] These locations are deemed to be the 'easily accessible' locations relevant to this project, as defined in ADQ as "windows/doorways, any part of which is within 2m vertically of an accessible surface such as the ground".

[6] Defined in SBD as "9mm thick timber sheet, expanded metal sheet, or other similar resilient material" (such as an 'impact resistant' plasterboard).

Ref	Recommendation	Function	Purpose	X
9.3.2.7	Post boxes should be designed such that post cannot be easily retrieved (or 'fished') through the letter plate. Where space permits, consider providing post boxes certified to TS 009. *Note: Certified post boxes are often larger than non-certified equivalents, and therefore require additional space.* **SBD Note: Secured by Design guidance strongly advises the use of TS 009 post boxes, where possible. However, this has not yet been identified as a requirement for SBD certification by the DOCO.**	To provide a robust mail storage function capable of resisting basic attempts of mail theft.	To deter mail theft and protect the personal information of residents.	☐
9.3.2.8	Provide an internal roller shutter certified to LPS 1175 Security Rating A1/SR1to separate the cafe space from the PBSA entrance out of hours. The shutter should be operable from within the cafe space.	To provide separation of uses when the cafe is not operating.	To deny access to the cafe space out of operating hours to reduce likelihood of theft or criminal damage.	☐

9.3.3 Lighting

Ref	Recommendation	Function	Purpose	X
9.3.3.1	Provide uniform levels of lighting to the cycle stores and associated corridors. Consider the use of light-coloured walls/floors which can support good visibility within such spaces.	To provide even illumination to the basement area.	To deter theft and provide conditions that allow building users to have good visibility.	☐

9.3.4 Access Control System (ACS)

Access control has only been recommended to external cafe entrance doors designed to facilitate PBSA access out of hours. This is on the basis that the cafe space will be publicly accessible during opening hours, and doors not designed to facilitate PBSA access will be manually-locked out of hours.

It is presumed that access control token production for PBSA and Affordable residents will occur off-site and be distributed to residents by the relevant building management team.

Ref	Recommendation	Function	Purpose	X
9.3.4.1	Provide access control functionality to: a. Main external PBSA entrance door[7]. b. Door leading into PBSA lobby[7]. c. Internal door from PBSA lobby into the Core 1 lift lobby. d. Doors out of the upper floor lift lobbies into residential hallways. e. Individual studio entrance doors. f. Door into the cycle store. g. Door to bin store. h. Plant room/corridor doors[8]. i. Door into mezzanine PBSA amenity space. j. Door at 1st floor level to external amenity space (in both directions).	To allow management of access for residents and management staff.	To deter planned and opportunistic theft and support post-incident investigations.	☐
9.3.4.2	Provide magnetic reed contacts to the doors listed in section 9.3.4.1, in addition to: a. External cafe doors.	To enable the monitoring of key building access points via the ACS.	To allow for the investigation of suspicious activity via VSS.	☐
9.3.4.3	Provide an audio and video intercom station at the following locations, linked to receivers in individual studios: a) Main PBSA entrance door. b) Door leading into PBSA lobby c) Door from PBSA lobby into the lift lobby. d) Doors from the lift landings into corridors from Level 1 upwards.	To enable the visitors to request access.	To restrict access to authorised users.	☐

9.3.5 Intruder Detection Systems (IDS)

Provision of a separate intruder alarm system has not been recommended or deemed appropriate for the development. Instead, we recommend the use of an Access Control System (ACS) capable of providing intruder alarm functionality through the use of door hardware and associated monitoring. These recommendations are detailed in section 9.3.4.

[7] These doors have conditional functionality as described in section 4.4. This leads to the inner door operating on access control during cafe operating hours (when the cafe roller shutter is open) and the outer door operating on access control outside of cafe hours (when the cafe roller shutter is closed). It is recommended this functionality is implemented via the access control system. This could be based on a 'time of day' condition, or linked to the open/closed state of the cafe roller shutter.

[8] These doors could also be mechanically locked if preferable.

9.3.6 Video Surveillance System (VSS)

The following recommendations describe a Video Surveillance System (VSS) capable of being monitored at the concierge desk.

Note: Cameras should be located, specified, and coordinated to provide the required views, with an image resolution appropriate to the task and other performance factors such as low light performance specified to match the location and intended use. This document references the following camera field of view requirements defined in BS EN 62676-4:

- Detection: target to be at least 10% screen height (and at least 25 pixels per metre).
- Observation: target to be at least 25% screen height (and at least 62.5 pixels per metre).
- Recognition: target to be at least 50% screen height (and at least 125 pixels per metre).
- Identification: target to be at least 100% screen height (and at least 250 pixels per metre).

Ref	Recommendation	Function	Purpose	X
9.3.6.1	Provide external fixed view cameras giving an **identification** level view of all external doors.	To allow formal surveillance and monitoring of external areas	To deter and detect unauthorised entry and acts such as ASB, graffiti	☐
9.3.6.2	Provide external fixed view cameras giving an **observation** level view of: • Building elevations at ground floor. • The public realm to the east of the building.			☐
9.3.6.3	Provide internal/external fixed view cameras giving a **recognition** level view of: a. Users of the mailboxes and parcel storage facilities. b. People within the lift lobbies on each floor level. c. People entering the cycle store. d. People entering the bin store. e. Building users within lift cars. f. Users of the cafe. g. Users of shared amenity spaces.	Capture and record images at key locations within the building.	To deter and respond to unauthorised activity and aid management of the PBSA demise.	☐

9.3.7 Security Operations

This section describes the features of the development and operational management provisions that support day-to-day operations and contribute to a secure environment for users and their assets.

Ref	Recommendation	Function	Purpose	X
9.3.7.1	Provide on off-site security management presence, capable of monitoring the ACS and VSS, and responding to incidents or requests for assistance by residents.	To provide a capability to respond to security incidents.	To reassure residents, provide a capable response to security incidents, and deter unauthorised behaviour.	☐
9.3.7.2	Provide a Main Equipment Room or suitable location to serve as a focal point for security equipment. This is normally a back-of-house location and should contain head-end equipment for ACS, IDS and VSS.	To allow for the monitoring and management of security systems.	To support the detection of and response to security threats.	☐

9.4 Affordable Homes

9.4.1 Design & Layout

Ref	Recommendation	Function	Purpose	X
9.4.1.1	Provide clear signage (naming and/or numbering) at the main entrance to assist residents, visitors, postal workers and the emergency services.	To aid the identification of the development and the dwellings within.	To minimise unintended nuisance calls and aid attendance by emergency services.	☐
9.4.1.2	Due to limited space available in the entrance lobby, provide external or 'through-the-wall' mailboxes and a parcel storage facility to allow deliveries to be deposited by couriers. It is recommended that parcel retrieval by residents is integrated with the access control system (or similar, such as proprietary smartphone app).	To facilitate the secure delivery of parcels pending collection by residents.	To reassure residents and minimise opportunity for theft of mail, burglary and identify theft.	☐
9.4.1.3	Restrict any use of etching or graphics to the ground floor glazing of the entrance lobby (e.g. to below 1m in height) so to optimise visibility from the lobby over Blackburn Road.	To allow natural and formal surveillance to occur unimpeded from the lobby.	To reassure both building users and passersby, whilst aiding the identification of illegitimate behaviour.	☐

9.4.2 Physical Security

Note: We recommend that the design team adopts a single-leaf or sliding doorset for external communal entrance doors (i.e. those operating on access control). Double-leaf door configurations are often less compatible with the types of locking systems typically suited to PAS 24 performance levels, and as such market availability of such configurations is known to be limited.

Ref	Recommendation	Function	Purpose	X
9.4.2.1	Provide doorsets certified to PAS 24[4] to the following locations: a. Main external communal entrance door. b. Cycle store door. c. Final escape doors. d. Bin store door. e. Individual apartment entrance doors. Care should be taken to ensure that all aspects of the doors' configuration (e.g. locking systems, escape hardware) are suited to the door's intended operation and form part of the scope of certification.	Products certified to PAS 24 provide at least 3 minutes of delay against covert forced entry using bodily force and concealable tools.	To provide a basic level of deterrence/delay to attempted forced entry to these building entrance points for the purposes of burglary or other activity.	☐
9.4.2.2	Individual apartment entrance doors should be fitted with: a. A door viewer; and b. A door chain or opening limiter.	To enable activity outside the entrance door to be observed, and for the door to be opened whilst maintaining a degree of protection.	To enable identification of guests or suspicious activity. To guard against suspicious or deception callers.	☐
9.4.2.3	Ground floor glazing (within doors and curtain walling) should meet the requirements of EN356 P1A or above.	To provide glazing with a resistance to physical attack consistent with PAS 24.	To provide a basic level of deterrence/delay to attempted forced entry.	☐
9.4.2.4	Provide cycle racks to the cycle store which allow both two wheels and the frame of a bicycle to be secured using the bicycle owner's preferred locking system(s).	To enable bicycles to be suitably secured when stored.	To reduce opportunities for bicycle theft.	☐

Ref	Recommendation	Function	Purpose	X
9.4.2.5	Where apartment entrance doors are fitted within lightweight (e.g. stud frame) walls, the wall should incorporate a 'resilient'[5] layer to the full height, and 600mm either side of the doorset. **SBD Note: SBD guidance advocates a similar treatment to be applied to all party walls between apartments. However, the DOCO has not specifically recommended this, and Toren would not advocate it.**	To provide a robust curtilage to each individual residential unit from communal space.	To deter and/or delay attempts to gain access to internal door hardware via communal walls.	☐
9.4.2.6	Post boxes should be designed such that post cannot be easily retrieved through the letter plate. Where space permits, consider providing post boxes certified to TS 009. *Note: Certified post boxes are often larger than non-certified equivalents, and therefore require additional space.* **SBD Note: Secured by Design guidance strongly advises the use of TS 009 post boxes, where possible. However, this has not yet been identified as a requirement for SBD certification by the DOCO.**	To provide a robust mail storage function capable of resisting basic attempts of mail theft.	To deter mail theft and protect the personal information of residents.	☐

9.4.3 Lighting

Ref	Recommendation	Function	Purpose	X
9.4.3.1	Provide uniform levels of lighting to the cycle store and associated corridors. Consider the use of light-coloured walls/floors which can support good visibility within such spaces.	To provide even illumination to the basement area.	To deter theft and provide conditions that allow building users to have good visibility.	☐

9.4.4 Access Control System (ACS)

It is presumed that access control token production will occur off-site and be distributed to residents by building management.

Ref	Recommendation	Function	Purpose	X
9.4.4.1	Provide access control functionality to: a. Main communal entrance lobby door. b. Door leading from entrance lobby to stair lobbies. c. At lifts at ground floor (lift call function). d. Doors out of the stair lobby at the basement/platform level. e. Doors out of the lift lobbies at each floor level, this includes: • Door into the cycle store. • Door into residential corridors. • Door at 6th floor level to external amenity space (in both directions). f. Door to the bin store[9].	To allow management of access for residents and management staff.	To deter planned and opportunistic theft and support post-incident investigations.	☐
9.4.4.2	Provide magnetic reed contacts to the doors and gate listed in section 9.4.4.1.	To enable the monitoring of key building access points by management via the ACS.	To allow for the investigation of suspicious activity via VSS (see 8.2.6) or directly.	☐
9.4.4.3	Provide an intercom at the following locations, linked to individual intercom receivers located in each apartment: a. Main communal entrance door. b. At lifts at ground floor. c. Doors out of the lift lobby at each upper floor level into residential corridors.	To enable the visitors and delivery drivers to request access.	To restrict access to authorised users.	☐

[9] Subject to local council collection requirements. It is highly advised that PIN no. entry is avoided.

9.4.5 Intruder Detection Systems (IDS)

The Access Control System (ACS, refer to section 9.4.4) provides intruder alarm functionality through the use of door hardware and associated monitoring for the landlord managed demise. This can be beneficial as it minimises the need for a separate alarm system.

Alarm provision for individual dwellings will be subject to the policy of the housing provider. As such, this section describes a baseline provision for intruder alarms, to enable future occupiers to install systems capable of meeting their specific needs and requirements.

Ref	Recommendation	Function	Purpose	X
9.4.5.1	Provide space and a fused spur within each apartment for future occupier installation of an intruder alarm panel.	Provide space and a fused spur within each retail unit for future tenant installation of an intruder alarm panel.	To deter and disrupt attempted forced entry.	☐

9.4.6 Video Surveillance System (VSS)

The following recommendations describe a Video Surveillance System (VSS) capable of capturing video footage for the purposes of off-site monitoring and/or post-incident review.

Note: Cameras should be located, specified, and coordinated to provide the required views, with an image resolution appropriate to the task and other performance factors such as low light performance specified to match the location and intended use. This document references the following camera field of view requirements defined in BS EN 62676-4:

- Detection: 25 pixels per metre minimum; 10% screen height.
- Observation: 62.5 pixels per metre minimum; 25% screen height.
- Recognition: 125 pixels per metre minimum; 50% screen height.
- Identification: 250 pixels per metre minimum; 100% screen height.

Ref	Recommendation	Function	Purpose	X
9.4.6.1	Provide external fixed view cameras giving an **identification** level view of all external doors.	To allow management of access for residents and management staff.	To deter planned and opportunistic theft and support post-incident investigations.	☐
9.4.6.2	Provide external fixed view cameras giving an **observation** level view of building elevations at ground floor.			☐
9.4.6.3	Provide internal fixed view cameras giving a **recognition** level view of: a. Users of the entrance lobby. b. Interactions at the mail and parcel boxes. c. People within lift lobbies on each floor. d. Entrants to the cycle store. e. Entrants to the bin store. f. People within lift cars. g. Users of shared amenity spaces.	Capture and record images at key locations within the building.	To deter and respond to unauthorised activity and aid management of the PBSA demise.	☐

9.4.7 Security Operations

This section describes the features of the development and operational management provisions that support day-to-day operations and contribute to a secure environment for users and their assets.

Ref	Recommendation	Function	Purpose	X
9.4.7.1	Provide on off-site security management presence, capable of monitoring the ACS and VSS responding to incidents or requests for assistance by residents.	To provide a capability to respond to security incidents.	To reassure residents, provide a capable response to security incidents, and deter unauthorised behaviour.	☐
9.4.7.2	Provide a Main Equipment Room or suitable location to serve as a focal point for security equipment. This is normally a back-of-house location and should contain head-end equipment for ACS, IDS and VSS.	To allow for the monitoring and management of security systems.	To support the detection of and response to security threats.	☐

9.5 Commercial

The following recommendations are made in relation to the commercial space.

Note: The bespoke nature of the vehicular access gate means it is unlikely the gate will be able to achieve a security rating. Therefore, this section describes the individual features of the gate designed to resist forced entry.

Ref	Recommendation	Function	Purpose	X
9.5.1	Provide external doorsets certified to PAS 24[3] to the following locations: a. All external pedestrian doors into the showroom along Blackburn Road. b. External door into the escape stairs. c. Door connecting the service yard to the showroom.	To provide a degree for forced entry resistance out of hours.	To deter/prevent forced entry to the industrial space.	☐
9.5.2	Provide external windows certified to PAS 24. Note: Glazed curtain walling falls outside the scope of PAS 24.	To provide a degree for forced entry resistance out of hours.	To deter/prevent forced entry to the industrial space.	☐
9.5.3	Ground floor glazing (within doors and curtain walling) should meet the requirements of EN356 P1A or above.	To provide resistance to physical attack commensurate with that of the main entrance.	To deter/prevent forced entry to the industrial space.	☐
9.5.4	The vehicle gate to the service yard should a. Not include any gaps (either beneath or in the design of the gate itself) that could allow a person to pass through. b. Incorporate features to make the gate an unsuitable surface for graffiti (e.g. include videos, relief etc.). c. Incorporate a locking system demonstrably resistant to tampering or attack from outside (for example, a padlock and fitting certified to LPS 1654 Security Rating 2).	To provide a degree for forced entry resistance out of hours.	To deter/prevent forced entry to the industrial space.	☐
9.5.5	Provide an assigned space and a fused spur for future tenant installation of an intruder alarm panel.	To enable the future installation of an alarm system capable of detecting intrusion.	To deter and disrupt attempted forced entry to the industrial space.	☐

10 Annex A - Compliance - BREEAM Hea06 Security

"A Suitably Qualified Security Specialist (SQSS) conducts an evidence-based Security Needs Assessment (SNA) during or prior to Concept Design (RIBA Stage 2 or equivalent)"

"The SQSS develops a set of recommendations or solutions during or prior to Concept Design (RIBA Stage 2 or equivalent). These recommendations or solutions aim to ensure that the design of buildings, public and private car parks and public or amenity space are planned, designed and specified to address the issues identified in the preceding SNA"

Gareth Hulmes of Toren acted as the required Suitably Qualified Security Specialist (SQSS) for this report, which has been designed and structured to meet the requirements of an SNA. Gareth is recognised as an 'SQSS' by BRE Global by virtue of his Chartered Security Professional (CSyP) status. Refer to BRE Global guidance here. Meanwhile, Gareth's public CSyP listing can be viewed here.

Claudia Parsons-Young of Toren supported the development of this report.

This report and the recommendations within were completed during RIBA Stage 2.

"A visual audit of the site and surroundings, identifying environmental cues and features pertinent to the security of the proposed development"

Refer to section 3 for evidence of the visual audit and associated findings.

"Formal consultation with relevant stakeholders, including the local ALO, CPDA & CTSA (as applicable), in order to obtain a summary of crime and disorder issues in the immediate vicinity"

Toren Consulting met with the Client, design team and police Designing Out Crime Officer (DOCO) to obtain their input in relation to the potential for crime and terrorism to affect the proposed development. The minutes of those meetings are detailed in full in Annex B and C.

"Identify risks specific to the proposed, likely or potential use of the building(s)"

For crime please refer to section 7.3. For terrorism please refer to section 7.4.

"Identify risks specific to the proposed, likely or potential user groups of the building(s)"

For crime please refer to section 7.5.1. For terrorism please refer to section 7.5.2.

"Identify any detrimental effects the development may have on the existing community"

Please refer to section 7.5.

"The recommendations or solutions proposed by the SQSS are implemented"

To be confirmed by the BREEAM Assessor on completion of the project.

11 Annex B - Client & Design Team Consultation

Meeting Note - 14 Blackburn Road (Architect)

11/12/2024, MS Teams

Attendees:

Tobias Corry - HTA

Maribel Mantecon - HTA

Austin Thomas - JAW Sustainability

Gareth Hulmes - Toren Consulting

Claudia Parsons-Young - Toren Consulting

Project Overview

- The project involves developing a mixed-use building in West Hampstead, London.
- The site is located between West Hampstead station to the west and the Granny Dripping steps to the east.
- The ground floor will accommodate a commercial showroom for the current depot occupant.
- The upper floors will contain affordable housing units and student accommodation.
- The site's topography presents challenges, with significant level changes from north to south on the western side.
- The project aims to support the gateway to a larger masterplan area, with increased footfall expected with future development in the vicinity to the east.

Ground Floor Design

- The ground floor, referred to as street level, will primarily consist of a commercial showroom with glazed shopfronts to activate the street.
- The building line at ground level will be recessed by a few meters to widen the pavement along Blackburn Road.
- This recess will extend across the entire ground floor facade, creating an overhang supported by cantilevered columns.
- The ground floor will include separate entrances for the affordable housing and student accommodation.
- A cafe space near the Granny Dripping steps will serve as both a public amenity and an entry point for students (see Security Considerations).
- A service yard for the commercial unit will be located on-site, enclosed by decorative fencing and controlled access.

Building Sections and Access

- The building is divided into two main sections: affordable housing on the west side and student accommodation on the east side.
- Each section has its own core and separate access from the ground floor.
- The affordable housing entrance is located on the north facade, while the student accommodation is accessed through the cafe (see Security Considerations).
- Both residential components include amenity terraces: one for the affordable units on a lower level of the west block, and another for students on the topmost story of the east block.
- The building's design incorporates deck access for affordable units on the north side, facing Blackburn Road.

Cycle Storage Arrangements

- Cycle storage for the affordable housing units is located at the 'platform level'.
- For the student accommodation, cycle storage is in the basement level.
- Access to these storage areas is currently planned through the main entrances and lifts, which may require further consideration to ensure practicality and security are balanced.

Security Considerations

- Concierge and cafe operational arrangements are unknown, other than that the cafe is to be publicly accessible.
- The space between the cafe and the Granny Dripping steps was identified as a potential concern, requiring careful design to prevent anti-social behavior and ensure integration

with the surrounding area (particularly if the space is to be open and accessible). The DOCO will likely wish to discuss this feature.

- The access control strategy for the student accommodation, particularly its relationship with the public cafe, needs further development both to ensure security to cafe assets out of hours and support authorised access to the PBSA. Options discussed included separate access points.

BREEAM Assessment and Secured by Design Certification

- The project will undergo BREEAM assessment for both the commercial and student accommodation components.
- While Secured by Design certification is not mandatory for BREEAM, it is likely to be a planning condition.
- Toren will arrange a meeting with the local Designing Out Crime Officer (DOCO) to discuss security measures and local crime concerns and invite HTA.
- This consultation will inform both the BREEAM assessment and potential Secured by Design certification.
- The planning application will need to be accompanied by a Crime Impact Statement as part of the planning application, which can be incorporated into the Design and Access Statement. Toren will provide this alongside their Strategy report.

Planning Application Timeline

- The project team aims to submit the planning application by the end of January 2025, though this timeline may be adjusted due to recent Design Review Panel comments.
- Toren will arrange a meeting with the local DOCO to occur pre-planning submission and provide meeting notes to the project team.
- They will also prepare a Security Strategy Report that will serve multiple purposes, including BREEAM compliance and optional planning submission.

12 Annex C - Police Consultation

Meeting Note - 14 Blackburn Road (DOCO)

16/12/2024, MS Teams

Attendees:

Tobias Corry - HTA

Aran Johnston - Metropolitan Police DOCO

Gareth Hulmes - Toren Consulting

Claudia Parsons-Young - Toren Consulting

Project Overview

Tobias provided an overview of the scheme:

- The project involves redeveloping a site at 14 Blackburn Road, north of West Hampstead Jubilee Line station in London.
- The existing single-storey builder's depot will be demolished and replaced with a mixed-use development.
- The new building will include a commercial showroom for building materials on the ground and lower ground floors, C3 affordable residential accommodation on the western half of the upper floors, and student accommodation on the eastern half of the upper floors.
- The site is long and thin, positioned between the Jubilee Line tracks to the south and the sloping Blackburn Road to the north.
- The scheme will act as a gateway to the larger proposed O2 masterplan scheme, which is expected to significantly increase foot traffic in the area and along Blackburn Road in the future.
- The site has significant level changes from west to east, which the design must accommodate using split levels.
- To the east of the site are:
    - The existing 'Granny Dripping Steps' that cross the railway tracks, and Billy Fury Way .
    - Billy Fury Way; a pedestrian and cycle way which runs to the sides and rear of several nearby businesses and connects to Blackburn Road.

Building Design Features

Tobias summarised several of the key building design features:

- A large portion of the ground floor facade is set back from the upper floors along Blackburn Road to widen the pavement, creating a somewhat sheltered overhang along Blackburn Road. However, the DOCO acknowledged that the recessed element was generally of an acceptable height (so as not to create excessive shelter) and the avoidance of using column supports (which impede light and visibility) was also positive.
- The commercial showroom will occupy most of the ground floor and maximise the provision of active frontages.
- Separate entrances are provided for the affordable housing, student accommodation, and commercial spaces. The student accommodation is currently planned to be amalgamated with a public cafe space. A new area of public realm will be provided to the east elevation, which can act as outdoor seating for the cafe use.
- A service yard for deliveries will be located to the centre of the commercial space at ground floor, which will be gated using a bespoke solution (possibly with input by a local artist). Due to the likely specialist nature of this gate, the DOCO agreed it was reasonable to locate any 'secure line' (i.e. the provision of certified facade elements) within the service yard.
- The lower ground floor will extend to the south, with glazing facing the railway tracks.
- Upper floors include deck access for the affordable housing on the north side and projecting winter gardens on the south side.
- Separate amenity terraces will be provided for both affordable residential and student areas.

Local Security Issues

The DOCO provided the following observations and advice relating to current crime and security issues:

- The DOCO advised the area has a history of anti-social behavior, drug dealing, street drinking, rough sleeping and criminal damage; particularly near to pedestrian pathways (such as Billy Fury Way, and Potteries Path and Black Path further north).
- The DOCO advised the Granny Dripping Steps are currently problematic and would benefit from being redesigned and integrated with the proposed public realm to improve safety.
- Separate access for both the student accommodation and the public cafe was recommended by the DOCO to prevent tailgating and unauthorised access.
- The DOCO recommended at least two lines of access control for the residential elements.
- The DOCO suggested access controlled lift/stair lobbies on each floor of the affordable and student accommodation uses were suggested as an alternative to lift access control.
- The DOCO confirmed PAS 24 rated doors were recommended for principal entrance points and to the affordable residential unit main entrance doors. However, this is not necessary for individual student studio rooms if floor access is controlled.
- The DOCO recommended the service yard gate design should prevent reaching in to activate exit mechanisms.
- The DOCO recommended video surveillance and lighting should be installed in the service yard.
- The DOCO recommended the southern boundary along the railway tracks should have a robust, locked gate for maintenance access.

Public Realm Elements

Tobias advised:

- A public square to the west is to be developed by TfL, which is expected to replace the corner unit fronting Blackburn Road and West End Lane.
- The cafe space adjacent to the Granny Dripping Steps (in combination with the proposed public realm) is intended to activate the area.
- There is potential for outdoor seating and spill-out space in front of the cafe.

Discussion occurred regarding delineating cafe seating areas from the adjoining footpath:

- Suggestions by the DOCO and Toren included using different paving materials or movable barriers to define spaces.
- Any external seating should be brought inside or secured overnight.

Cycle Storage

Tobias summarised the cycle storage provision:

- Separate cycle storage for affordable residential and student accommodation will be provided at the lower ground and basement levels.
- Access to cycle storage will be via the main lifts.
- The project team is investigating potential separate entry/exit routes for bicycles.
- The design team will review the entrance strategy for the student accommodation to potentially separate it from the cafe.
- Further investigation is needed regarding the robustness of the fence along the railway boundary.
- The project team will meet with TfL to discuss the proposed public square and potential changes to the existing staircase.
- Consideration will be given to extending works around the Granny Dripping Steps to improve safety and appearance.

Concerns were raised by the DOCO about the security of bicycles, as student accommodations have experienced high levels of bike theft.

Closing Comments

- Gareth advised the Crime Impact Statement will reflect the discussions and any design changes resulting from this meeting, and be incorporated in the DAS or as a standalone document.
- The DOCO advised Secured by Design related planning conditions are occasionally applied to new developments by Camden Council, and the Met Police would encourage this when consulted.