

[REDACTED]

From: [REDACTED]
Sent: 13 November 2017 09:36
To: Planning
Subject: Planning reference - 2017/4925/P

FAO Leela Muthoora

Thank you for allowing me to comment on the following planning application at 118-132 New Oxford Street, WC1A1HL.

I have reviewed the plans and though I have no issues or concerns with actual project, I do have a few worries about the placement of the ATM's.

1. The installation of the ATM in Bainbridge Street would not be the best location for this, the area is historically a well known location for the taking of Class A drugs and also a frequent place which suffers from anti-social behaviour. This ranges from urination in the street during the night and also rough sleeping. The area itself is not well lit at night and is a very unpleasant place to walk down during the hours of darkness, though close to the rear of the Dominion Theatre and a very busy Starbucks the pedestrian footfall is very modest for the area even during the day. Also, as it is a 'one way' street vehicle traffic is also limited.

I feel that if the ATM is placed here then it will become a crime generator as a result of its seclusion and due to it having no natural surveillance from the surrounding area. I can see this being a prime location for begging as it out of the way which will prevent people using the ATM as the 'fear of crime' will be present.

Over the years, Bloomsbury and Holborn have suffered terribly from ATM thefts, especially 'shoulder surfing' where a organised groups will obtain a 'users' PIN number and then distract them to obtain their cash card. I can foresee this ATM in Bainbridge Street being an ideal location for this type of crime.

2. The ATM's on New Oxford Street themselves will be better protected with the heavy footfall of the area. But a small concern would be they will reduce the width of the already narrow footway and created a blockage in the area. This could lead to slow moving pedestrian movement and therefore make 'pick pocketing' a concern.

I would recommend that if the project team wish to speak with me about the above issues I will be more than happy to work with them to see if we can find a better solution.

If not then I would insist on the following implementations to mitigate the above risks.

2.0 Recommended Minimum Standards

2.1 – Natural Surveillance –

Good natural surveillance of the 'ATM/Payphone Pod' from immediately adjacent roads and properties is vitally important. More specifically, the 'ATM/Payphone Pod' should NOT be located in recessed alcoves, on blind corners, quiet side frontages or semi-enclosed shopping parades. Other considerations include - obstructions such as other telephone kiosks, large planters, trees, highway signs and advertising hoardings that compromise natural surveillance. The 'ATM/Payphone Pod' should not be so positioned that it can be watched by potential robbers under the guise of legitimate citizens (e.g., from a nearby bus stop; or surveillance by criminals from first floor public areas overlooking the site).

2.2 – Mirrors –

The use of surrounding mirrors / polished surfaces to improve surveillance for the ATM user is an effective measure in reducing both crime and the fear of crime (e.g., to prevent 'shoulder surfing' and compromising the user's PIN). Mirrors should be placed at an appropriate height so as to avoid reflection of the key pad numbers.

2.3 – CCTV –

The Installation should have both Overt and Covert 24hr CCTV provided with a min 28 day storage facility. This must be dedicated to the installation and be in accordance with the data protection guidelines. Overt coverage should be designed to capture the user and surrounding area (shoulder surfers and offenders

tailing victims off etc). The Covert coverage should be designed to capture and identify any ATM user therefore identifying potential offenders interfering with the installation, using stolen cards, cash claws etc.

2.4 - Street Lighting –

Improved levels of street lighting have been shown to both reduce crime and the fear of crime. The area surrounding the installation should conform to BS5489-1 the lighting source can be provided by the installation or surrounding existing light sources.
(http://www.securedbydesign.com/pdfs/110107_LightingAgainstCrime.pdf).

2.5 - Defensible space –

Ground markings (otherwise known as a 'Privacy Zone') should be employed at the front of the ATM, to indicate only one ATM user at a time may enter the space. These will usually be subject to local authority planning consent/condition.

2.6 – Bollards –

In addition to the anchoring system recommended, consideration should be given to the protecting the installation with anti-ram raid bollards, vehicle arresting systems, high-rise kerbing, raised planters, reinforced lamp posts or similar street furniture if the risk of a vehicle borne attack is likely . These will usually be subject to local authority planning authority consent or condition.

2.7 - PIN Shields -

PCI standard pin shields should be installed to prevent physical observation of the users pin code.

2.8 - Design of the 'ATM/Payphone Pod' -

The ATM should be positioned to prevent physical observation of PIN entry from adjoining telephone kiosks or payphones. The ATM and telephone uses of the combined kiosk must be positioned on opposite sides of the booth/pod.

The telephone leads in adjacent telephone kiosks or payphones should be shortened to prevent observation of PIN entry by persons using the payphone. Where necessary, the door hinges of adjacent telephone kiosks should be reversed in order that payphone customers exit away from the ATM user.

3.0 Best Practice 'ATM Security Working Group' Guidelines

The following guidance should be considered.

3.1 – Anchoring systems –

As outlined in the above document, the ATM Security Working Group 'Best Practice for Physical ATM Security' Guidelines.

3.2 – Alarm Systems –

The 'ATM/Payphone Pod' should be independently alarmed for 'Police Response' (registered with the local police force and allocated a police alarm URN). For other alarm guidance please see the aforementioned document, the ATM Security Working Group 'Best Practice for Physical ATM Security' Guidelines.

3.3 – Fogging Systems -

As outlined in the attached document, the ATM Security Working Group 'Best Practice for Physical ATM Security' Guidelines.

3.4 – Tracking Systems –

As outlined in the attached document, the ATM Security Working Group 'Best Practice for Physical ATM Security' Guidelines.

3.5 – Cash Degradation Systems –

As outlined in the attached document, the ATM Security Working Group 'Best Practice for Physical ATM Security' Guidelines.

3.6 – Gas Attacks –

Consideration should be given as to whether the 'ATM/Payphone Pod' could be vulnerable to a 'Gas Attack'.

3.7 – Other security measures –

Each application should be judged on its own merits and site-specific recommendations should be adopted. Any other security can be recommended as deemed suitable and outlined in the attached document, the ATM Security Working Group 'Best Practice for Physical ATM Security' Guidelines.

Section 17 of the Crime and Disorder Act 1988 states "It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it's area", as clarified by PINS953.

The National Planning Policy Framework (NPPF) states that "Planning policies and decisions should aim to ensure that developments create:

- ∞ ***Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion***

Creating a sense of place where legitimate users are able to go about their daily routine without unduly fearing crime or insecurity is a key element of the Secured by Design initiative.

The services of the Police Designing Out Crime Officers (DOCOs) are available free of charge and can be contacted via the details shown above.

Kind regards

Jim

**Jim Cope | Police Officer | Metropolitan Police Service
Continuous Policing Improvement Command**

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Office Email: DOCOMailbox.NW@met.police.uk

Address: North West DOCO Office, Ruislip Police Station, The Oaks, Ruislip, HA4 7LE

Crime Prevention advice can be found on the Metropolitan Police Service Website - <http://content.met.police.uk/Site/crimeprevention>

If you have access to the MPS Aware Intranet there are additional Crime Prevention features on this page - http://intranet.aware.mps/corporate/crime_prevention/tactics.htm

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