

## Henriques, Roberta

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**From:** Jim.Cope@met.police.uk  
**Sent:** 09 January 2020 13:33  
**To:** Planning  
**Subject:** Planning Response - 2019/6088/P - Kodak House, 65 Kingsway, WC2

FAO Elaine Quigley,

Thank you for allowing me to comment on planning application 2019/6088/P which relates to Kodak House, 65 Kingsway, WC2.

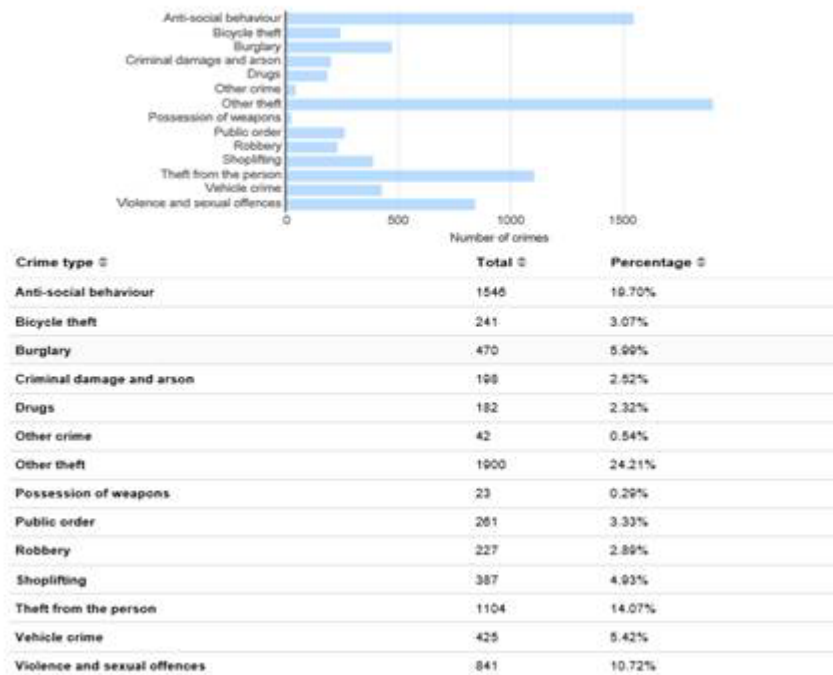
I have been involved in carrying out a site visit with the applicant which was carried out in September 2019.

I have no objections to the proposal but did have the following comments and recommendations to make, which were passed on to the applicant in the form of a 'Security Assessment'.

### **Security Assessment**

- **Visual Audit** - The planned proposal for 65 Kingsway is a refurbishment of the existing building with mainly internal layout changes being considered. The building faces east onto Kingsway and is bordered by Wild Court to the north and Keeley Street to the south. Kingsway itself is the main route between Waterloo Bridge, Aldwych and Holborn therefore there is always a high volume of vehicle and pedestrian traffic using this route. The majority of buildings within the area are associated with mainly commercial properties with numerous cafes and restaurants on the ground floor whilst the upper levels are utilised for office space. Other buildings close by are theatres, licensed premises and even a few residential units. With Holborn and Covent Garden Tube Stations being in close proximity the area is extremely busy at all times of the day and night with large numbers of people taking advantage of the various activities within the area.
- **Crime** - 65 Kingsway is covered by 'Holborn and Covent Garden' Local Policing Team and the following crime figures cover the period from August 2018 and July 2019.

## Comparison of crime types in this area between August 2018 and July 2019



- As it can be seen from the statistics the main crime to occur within the area is 'Other Theft' with 1900 recorded incidents making 24.21% of all recorded crime – This crime type can be best described as 'opportunity theft' where a suspect will enter a building, mainly offices or cafes, and steal unattended bags, mobile phones or high value technical equipment from victims who tend to be distracted or feeling comfortable within the space they are occupying. Anti-Social behaviour is second highest for recorded incidents with 1546 and makes up 19.70% of the total, this can be attributed to the large amount of people within the location and can be associated with drugs misuse, public urination, noisy/rowdy behaviour and people not dispersing from the area after visiting licensed premises. The third crime type is 'Theft Person' with 1104 incidents and making up 14.07% and this is where a suspect has actually been in physical contact with a victim and mainly occurs outside in the street. This crime is mainly pickpocketing due to the high volumes of pedestrian activity and the crowds that form outside the main public transport links and also at the busy pedestrian crossings where once again opportunity is available.
- Use of the building** – During the security assessment visit it was established that the building would be used for multiple uses, namely office spaces and a gym. As a result of this decision it is imperative that the 'Access and Movement' within the building is addressed and that any potential cross over between the two uses are protected. This is certainly the case where fire exits from one use to another exist. The current layout of the building has the main entrance on Kingsway and as you walk into the building the reception is concealed behind a screen allowing no natural surveillance onto this important first line of defence as there is no visible indication the building has any security. The next concern is that there is a staircase that leads to the upper level prior to the reception area and a person can easily walk into the main entrance and access this area without being challenged or having to walk past a supervised reception point. The new design is looking to achieve two entry points, maintaining the Kingsway entrance and creating a 2<sup>nd</sup> within Keeley Street. This will open up the reception area and I would recommend that the supervised reception area be centrally located so that it is clearly visible from both entrances and a visitor has to walk past it before approaching the internal lifts or stair cores. Due to 'Other Theft' being so high within the area having multiple entrances and exits is a high risk as it allows a potential suspect to walk in, commit crime and then leave without fear of being challenged. Enforcing the requirement that all staff display their security pass whilst inside the building will help to identify potential intruders and people should be encouraged to challenge people who are

- **Access and Movement** - Due to the open reception and that there will be no security line on the main entrances I would strongly recommend that there is encrypted FOB access control on the main stair core and that destination control installed on the lifts. The redesign of each of the office levels will allow this to happen as none of the lifts open up with the office space and therefore a 2<sup>nd</sup> line of access control will also control access to each level. This has the benefit of future proofing the building to allow for multiple occupancy or allowing a single tenant to have better control over their space. The fire exit link between the gym and office space will require extra protection due to the risk of this being a high risk location. Certainly if there are different opening times between the uses then either could be vulnerable at different times. A solution would be to have the doors only opening upon a confirmed fire alarm activation to prevent the need of having manual openers that could be misused. Certainly the doors would be required to be alarmed which would be linked to reception and covered by CCTV to mitigate the risk of illegal entry. The basement area is also another location where access and movement will be required if there is cross over between uses.
- **Physical Security** – I will always recommend, where achievable due to the building being within a conservation area, the use of police preferred security rated products as referenced in the ‘Secured by Design’ guides. For instance any new external door should always be security rated to a minimum of PAS24:2016 with a minimum of two magnetic locks positioned two thirds from the top and bottom of the frame and integral within the door unit. Certainly the external entrance for access to the cycle store would benefit from this kind of security level as well as the door to the internal cycles store itself. The use of ‘Sold Secure’ products within the cycle storage area itself is recommended to allow for three points of locking... both wheels and the frame are required to be secured.
- **Exterior** – Ideally all doors on the exterior should have a minimum recess of 600mm to reduce the risk of them being used for either rough sleeping, drugs misuse or public urination. The main entrance on Kingsway has an iron gate which is present and should be used as part of the security strategy at night to prevent the area being misused. The entrances in Wild Court and Keeley Street are particular vulnerable to this kind of activity due to them being off the main pedestrian/vehicle route and also they do not have good natural surveillance overlooking them.
- **Overall Assessment** – There are no major issues being created by this proposal and I cannot for see it causing any major issues to the local area. As long a security is considered throughout the application and that crime prevention is followed once the building is in use then the risks associated with crime should be reduced.

If the applicant wishes any further help or advice in regards to this then I will be happy to be contacted.

Kind regards

Jim



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