From:

Sent: Wed, 4 Mar 2020 09:26:46 +0000
To: Planning <Planning@camden.gov.uk>

Subject: Planning Response - 2019/4421/P - ATM, Dry Cleaning & Laundry Company, 18 Bloomsbury

Attachments: image001.png; image002.gif; image003.gif

FAO Joshua Ogunleye,

Thank you for allowing me to comment on planning application 2019/4421/P which relates to the installation of an ATM at the Dry Cleaning & Laundry Company, 18 Bloomsbury Street, WC1. I have reviewed the plans and object to this proposal on for the following reasons.

Objections

- The area in which the ATM is to be placed suffers from a high number of anti-social behaviour incidents due to its central location which is a popular tourist attraction with a busy night time economy. Bloomsbury Street itself is a main road which is extremely busy and has a number of bus routes travelling along it which run 24 hours a day. Very near to the proposed location are at least two bus stops which service a number of routes. This means the area is frequented by large amount of people throughout the day and night. Therefore with the increase in people there is always an increase in crime and also the fear of crime.
- The area itself is saturated with ATM's... there is currently Two (2) situated immediately next door.
- New Oxford Street and the surrounding area suffers from anti-social behaviour which predominately is begging, street drinking and Class A drugs misuse. An ATM is an easy place for a beggar to sit next to and harass users for money. It is uncomfortable for a user to approach the ATM in the first place as they have the awkwardness of feeling pressurised by the beggars presence.
- As a result of the above persistent anti-social behaviour, police are regularly called to the location to move people on or address issues arising from their presence.
- Cash point thefts are also an issue. Especially at night when the ATM's are used by people who are heavily intoxicated and are vulnerable. They are not aware of their surroundings and can become victims as they leave the ATM and this is more likely to occur at an ATM which is away from natural surveillance. The Two (2) large pillars of the existing building will mean the ATM will be heavily recessed, meaning a user will not be seen or benefit from any form of natural surveillance. In fact a major concern is that they could be 'trapped' within in this space as there is no means of escape if they approached by criminals. The cover and concealment the recess will create will also allow criminals to place cloning devices onto the ATM without being seen.
- In this day and age 'contactless' payment is on the increase and can be used on the tube and buses. Therefore the need for cash is not as imperative as it once was. I feel that an extra ATM in the heart of of High Holborn and Seven Dials is not beneficial to the local area, residents or visitors and will in fact create more anti-social behaviour and crime.

If the application is approved then I would insist that the following recommendations for ATM's be followed.

- 1. CCTV coverage of the ATM. (consider colour rendering index min >60Ra)
- 2. Lighting to the security standard BS5489:2013 from additional or existing lighting. Please see additional information below.
- 3. Pin guards to the ATM.
- 4. Privacy Markings on the pavement.
- 5. The provision of a secure enclosed room behind the machines for maintenance and to provide the ATM replenishes within a private space, separated from the public, where they can reload the cash cassettes at the most vulnerable point of the process. The walls should be able to resist a physical attack i.e. plywood lined with plasterboard and should be a minimum of 2.1M high, but ideally from floor to

ceiling depending upon the associated risk as determined by the DOCO. The opening must be sufficient for an operative to enter freely and replenish with the door closed behind them. If the opening comprises of two doors the slave door should be secured with a deadbolt and not with a manual slave bolt/s. The locking system that allows egress in an emergency (i.e. a thumb turn override) must meet BS EN 1125:1997 Building Hardware and BS EN 179:1998 (Emergency) release test standard. Should this application be successful, the type of lighting around this structure will be an important factor in reducing crime, reducing the fear of crime and apprehending suspects should a crime occur. Therefore I would make the following recommendations that are regarded as crime reduction "good practice" in relation to lighting.

ATM Lighting:-

- 200-300 Lux is recommended for ATM keyboard illumination.
- \bullet 50 Lux is suggested as the minimum ambient illumination at floor level up to a distance of 1 metre from the face of the ATM and extending 75 cm either side of the mid-point of the ATM.
- This is also the minimum level recommended should a CCTV camera be fitted. 200 Lux ambient illumination at floor level should be considered in areas deemed to pose a higher risk to customers at night. (Consider colour rendering index min>60Ra)

Additional security measures and practices may well be required and will depend on existing local premises security and any risk assessment carried out prior to site selection and installation. If the applicant requires nay further help or assistance then I will be happy for them to contact me for additional advice.

Kind regards

Jim



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