
From: [REDACTED]
Sent: 15 June 2020 12:21
To: Planning
Subject: Planning Response - 2020/1166/P - 128 Euston Road, NW1 - ATM

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FAO Tony Young

Thank you for allowing me to comment on planning application 2020/1166/P which relates to the installation of an ATM within the frontage of 128 Euston Road, Kings Cross, NW1.

I have reviewed the application, carried out enquires to establish if the location is suitable for the ATM and also searched the police intelligence databases for recent crime and anti-social behaviour statistics. As a result of these enquires I have to object to the proposal as I feel the placement of an ATM within this location will generate crime, a fear of crime and increase anti-social behaviour.

Please find my comments and objections which will justify my decision.

Comments and Objections

- Location - 128 Euston Road is a 'Currency Exchange' premises and is deeply recessed away from the main pedestrian foot path on the north side of Euston Road. This route is well used by pedestrians moving between Kings Cross/St Pancras and Euston main line train stations but the ATM will be well away from this positive activity and will not benefit from the 'natural' surveillance these pedestrian will create. Even with pedestrian activity being 'close' by their potential vision into the recessed area is blocked by the well-established tree dominating the centre of recess. The planned location of the ATM will mean it will be in direct line of sight of the tree which will mean a person using the device will not be seen by passers-by and will be vulnerable.
- Asking a potential user to approach the ATM down into this recess with only one way in and one way out will most certainly generate a fear of crime as there is no other means of escape if they were approached by a person with criminal intent. I would strongly suggest a criminal would quickly identify this vulnerability and exploit it as they know the potential victim will be in possession of cash. With the high tourist trade within the area certain travellers are well known for carrying large amounts cash whilst visiting the area. These victims are seen as easy targets for criminals whether it is by a robbery or deception.
- Not only is the victim vulnerable the device itself will be also. The potential for a criminal to attach a 'Lebanese Loop' to the device or carry out a distraction theft is increased as there is no 'natural' surveillance overlooking it due to the neighbouring buildings having no activity present and once again the tree with its extensive canopy prevents any 'informal' surveillance from Camden Council CCTV covering the area. The tree and buildings also block out natural and artificial light so any benefits this may have is lost.
- Any main transport hub in London generates a large amount of anti-social behaviour which can manifest itself in the form of rough sleeping, begging and associated substance abuse. Though not offence in itself there is an issue with begging being reported to the police on a daily basis which will involve an officer having to be deployed to check on their welfare to offer help, support and directions to outside agencies who can assist them. The neighbouring building to the west of the proposed ATM has a large exposed flat

surface which provides cover from the natural elements and is perfect for sitting on and even laying down. I would suggest that with an ATM being installed here it will become a favoured location for rough sleeping and begging as they will be close to any potential person who may give them money. Once again the 'fear of crime' will be created for a potential user and this may have an adverse effect on their actions and behaviour.

If this proposal is proposal is excepted then I would recommend the following advice and recommendations be made into a planning condition to mitigate the risks I have identified.

ATM Recommendations

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 replenisher with 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.
6. Consideration to what existing street furniture is present directly opposite the proposed ATM should be made, in this case the low raised planter, as any objects that allow for being used as a seat or a back rest may be used for anti-social behaviour or begging. Though a common issue throughout the London Borough of Camden this particular area does not suffer from such behaviour as much, but it can generate a fear of crime for pedestrians or users of the ATM itself and may prevent them from using the device as it may become a favoured location for this type of behaviour. Certainly if the area will see an increase in pedestrian footfall due to the supermarket.
7. As included within the proposal 'anti-ramming' bollards are to be installed to negate the potential for this type of crime from occurring.

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.
- 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 any further advice or assistance then I will be more than happy to be contacted directly.

Kind regards

Jim



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