Subject: Planning Response - 2020/3737/P - 238-250 Camden Road, NW1

FAO Charlotte Meynell

Thank you for allowing me to comment on planning application 2020/3737/P which relates to the redevelopment of the site to include demolition of existing hostel building and the erection of a new 4-6 storey plus basement hostel building with external stairwell containing Thirty-nine (39) residential units at 238-250 Camden Road, NW1.

I have been involved with this project already and have had a meeting with the applicant which was held on the 10/12/2019. I have no objections to the proposal and submitted the following comments and recommendations to the applicant during the consultation phase.

The main priority to be considered for the end users of the building, is to create a safe and secure environment in which they can live and for the building to be used correctly, which will reduce the risk of crime and anti-social behaviour from occurring. By the very nature of the building, some of the residents will be classed as being vulnerable, whether as victims of domestic violence, including incidents of child protection/safeguarding or even honour based violence. As a result of these being all high risk offences then the need for physical security will be paramount within the building if offenders discover a residents location. This protection will also assist and protect members of staff who will be working at the location and will reduce the fear of crime for a resident. I would recommend that a planning condition is placed on this application so that it will achieve 'Secured by Design – Silver' accreditation.

Comments and Recommendations

- Vehicle/Pedestrian access As the first line of defence for the entire building this should be ٠ treated with careful consideration. The front of the building faces onto Camden Road, which is a main route between Islington and Camden Town. Therefore, as stated during the meeting, vehicle access into the location will be still required. I would recommend that a 'one way' system for vehicles is established, utilising one gate as the main entry point, which will use video/audio control entry direct to the main reception. Vehicles can then leave via the south west route. The use of an 'induction loop', for activating the exit gate is not recommended, as this can easily be bypassed by using a metallic object to open the gate. Therefore this should be controlled by staff members for visitors or encrypted FOB exit for residents/staff. Encrypted FOB control will be required for residents and staff as this will prevent FOB's being copied if either lost or stolen. From our discussions the most favourable entry for pedestrians will be the north east gate which will have the separate entrance from vehicles (also linked via video/audio control to reception) and also as it will be in line of sight of staffed reception area itself. The ability to have 'Data Logging' for the access control system will be a benefit in case of misuse.
- Boundary Height This should be a maximum of 1.8m height and the treatment should be a consistent level across the whole frontage. For example the vehicle/pedestrian gates should match the height of all 'fixed' boundaries. Consideration needs to be made to ensure that all climbing risks are eliminated. This can be achieved by narrow vertical bars, no midway horizontal bars and to be flush with any existing boundary all of which will reduce hand/footholds. Any change in levels with the ground will also need to be considered to reduce the risk of a person being able to crawl under the boundary.

- The reinforcing of the front 'fixed' boundary treatment with defensive planting is welcome as this provides extra depth and will further reduce the risk of the boundary being climbed. Ideally this should be about 1.1m in height and no more than 1m in depth. The use of prickly planting can be considered to increase the 'defensive' properties of the boundary.
- The boundary to the sides and rear of the building will also need to be addressed if there is a climbing risk from neighbouring buildings. This ensures that the security this project puts in place is not negated. Once again a 1.8 m boundary is considered adequate to reduce the risk of climbing.
- Planned access gate to the rear of the building should be positioned flush with the building line to reduce the risk of a vulnerable dead end alleyway. A second gate at the rear of the building will provide extra protection as long as the boundary with the neighbouring building is protected.
- Cycle Storage At this moment in time positioned at the front of the building and close to the south west boundary. I recommend that this be repositioned to the rear of the building as I feel, though being a secured storage area, it will still be vulnerable as there will not be much pedestrian activity in its current location being as far from the main reception area. Also it may reduce the height of the boundary at this location to make it easier for entry. All cycles should have the ability to be secured by three points of locking (both wheel and the frame) to a suitable secure cycle storage system.
- Main reception door should be security rated to LPS 1175 SR2 with encrypted FOB access control for residents/staff and once again video/audio control access direct to the reception to allow visitors access.
- Rear reception door should ideally be security rated to LPS 1175 SR2. This should have encrypted FOB access control from the garden area for residents/staff.
- Postal Strategy Located within the main communal reception area Be of a robust construction with a maximum aperture 260mm x 40mm, have anti-fishing properties, fire resistance properties and installed in accordance with the manufactures specification. Security rating TS009 will meet all these requirements.
- Bin storage Doors should be 'robust and fit for purpose' and have a minimum of two locks positioned one third from the top and bottom of the frame. Ideally this should be linked to the access control system for the building so residents can freely use but they are properly secure.
- All doors to residential units shall be PAS24:2016 No letter plates will be required due to the postal strategy... but they will still require a door viewer.
- Any ground floor windows which are openable will be required to be PAS24:2016... if there are openable windows easily accessible from communal areas on upper levels they will have to be PAS24:2016 also or if they can be reached by climbing. Any window below 3 metres is deemed as at risk from climbing.
- Utility Meters In a central location which will prevent a person from approaching each residential unit. The use of 'Smart Meters' can also be utilised.

- On access controlled doors the use of 'push to release' or 'Emergency Green Break Glass boxes' will be required to be protected if they can reached from the 'access control' side. The emergency break boxes can be accidentally activated if too close to a push to release button and if not on an automatic reset can go unnoticed losing all security on the entry point.
- The external community room should have security rated doors and windows meeting security standard PAS24:2016.
- Consideration to the protection of staff should be made in terms of physical security being placed for example on the reception desk... the installation of a protective screen would improve staff security. I would recommend that the door to the staff area be security rated to PAS24:2016 so in the case of an attack they have a safe location to stay within.

Additional Comments – For BREEAM

- We discussed the potential for climbing from the neighbouring properties is quite evident both from the North and South. Both of the properties bordering this boundary are open and can easily be accessed by pedestrians. The positioning of their rubbish bins reduces the height of the wall protecting Camden Road Hostel and therefore any current security features to gain entry to the communal entrances of the building can easily be by passed.
- The main front boundary does have a climbing risk due to the retro fitting of the fencing on the top of the original low brick wall. Ideally these railings should be lower to remove the easily accessible foot hold between wall and the fence. As mentioned in the meeting if this cannot be achieved then the use of defensive planting on the private side of the boundary will assist in making it more difficult to use as an entry point.
- The protection of any 'push to release' buttons is highlighted in the picture as though covered in a partial shroud, due to the recessed vehicle access point, it can still be easily reached if a suspect uses an extension device. This is why it is important to ensue these are protected adequately and also consider the timings for how long the access point is open for once released.
- The above comments and recommendations, if implemented, will mean the project achieves 'Secured by Design – Silver' accreditation, which I would strongly recommend. Further information can be found on the following website <u>https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019.pdf</u>

If the applicant wishes any further help or assistance regarding this project then I will be more than happy to be contacted.

Kind regards

Jim



Jim Cope Police Constable – Design Out Crime Officer Metropolitan Police Service Continuous Policing Improvement Command (CPIC) a. Ruislip Police Station, 5 The Oaks, Ruislip, HA4 7LF