
From: [REDACTED]
Sent: 27 March 2021 11:40
To: Planning
Subject: 155 Regents Park Road comments and recommendations Planning reference - 2021/0877/P

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Good Morning,

Thank you for allowing me to make comment on the development at 155 Regents Park Road. I have no objections to the development but have the following recommendations to make. The development should have a SBD condition attached to it owing to the technical requirements outlined, as this area has very high rates of crime and Antisocial behaviour

Outside Space and landscaping

- There is a proposal for tables and chairs from the hotels café and bar to be used on the paved section outside the hotel frontage. It is strongly recommended that they be removable and not fixed as a permanent feature. If left out overnight they will attract gathering of non-hotel guests. This will cause antisocial behaviour in the form of noise and rowdy behaviour to littering, street crime and drugs/alcohol misuse. These gatherings will increase the fear of crime for both local residents and hotel guests.
- The location for the outside tables and chairs is in close proximity to the pop up toilet already in existence outside the hotel. The times of operation for this are 2200 – 0400 hours Friday and Saturday. This could conflict with hotel guests/visitors/customers sitting outside using the hotels café or bar. Consideration to adjusting hours of operation so as no conflict will occur.
- For the reasons already mentioned above it is advised that no bench seating be installed outside the front of the hotel.
- There is a proposed tree outside the front of the hotel. If this provides shelter it could attract people who will congregate. Depending on the trees size and shape it could turn into a concealment opportunity. Light levels may also be effected by this planting.
- Any planting should be ground level to prevent opportunities for concealment. Any raised planters/walls create seating opportunities which should be avoided at this location. Visibility and good natural surveillance are great deterrents to crime. Any trees/plants within this area needs to be well maintained so as not to become an issue further down the line. More foliage in the form of trees and the like may provide further opportunities for public urination/defecation. This would especially be the case during the hours of operation for the pop up toilet and there is a queue and people under the influence of alcohol or drugs do not wish to wait.
- The proposed disabled parking space if this is to be used overnight is next to the pop up toilet. The vehicle could be used as a seating opportunity for those waiting to use the toilet facility. The vehicle could also be vulnerable to criminal damage as well as being used as a concealment opportunity. Public urination and defecation may also take place on or around the vehicle.
- Visiting cycle stands outside the entrance should be London stands and not Sheffield stands. London stands have a tapping bar. If the lock is secured above this bar then the ground cannot be used along with a blunt instrument to break bicycle locks. The stand should be filled with concrete to assist robustness and should be fitted into the ground ensuring no screws or bolts are exposed.

Building Exterior

- The entrance is recessed which provides an undercroft area. This could attract smokers/vapers to take ownership. Guests will have to use this main entrance to enter the building which could be an unpleasant experience. The smell could also permeate through the ground floor. Apart from the smokers as it is sheltered other people could congregate in this area. The gathering of unknown people in an area can increase the fear of crime and increase the risk of antisocial behaviour. It is recommended that this area be turned into an air lock style entrance. This would benefit staff of the hotel at night when less staff are on hand in order to vet the persons seeking entry from a more secure position.
- The railings protecting the lightwell on the front façade need to be high enough to negate them being climbed upon or being used as a seating opportunity. The lightwell could become a place where rubbish collects either through littering or wind-blown.
- Brickwork (hit and miss or recessed) should not provide a climbing opportunity. Any external fittings/fixtures such as guttering and drainpipes should be recessed and flush with the building line.
- From the view on Haverstock Hill there are large windows which appear to look through into the lobby/reception/café/bar area. If this is a recess it could attract people to linger. If there is a step at the bottom to ensure that it does not become a seating opportunity to remove the sill/step or install ground floor planting to prevent any issues from occurring.
- The refuse store door needs to be flush with the building line. It is recommended that a single leaf security rated door to LPS 1175 SR1 or STS 202 BR1 be installed at this location. Access should be through key fob entry only. The door will require an auto close feature and automatically lock. This will prevent the door from being left ajar either through accident or on purpose. Bins store that are insecure and accessible are strong attractors of antisocial behaviour and can attract drug misuse. There is an interconnecting door which leads into the hotel. This is for cleaning staff only. Again this door needs to be security rated to a minimum of PAS24:2016. Access should be through encrypted key fob (staff only). Inside the bin store should be a press to release (only for the public realm) to prevent persons becoming trapped within. This should also assist in emergency egress as it will allow flow of persons in one direction out of the hotel and onto the public realm.
- Do any fire exits exit onto the public realm? The door exits should not be recessed as they can be used for urination. These doors need to be alarmed and monitored with CCTV. Fire exits are often used to bypass security and hotel staff. People vulnerable to child sexual exploitation (CSE) are often smuggled into hotels this way.
- How will the courtyard be accessed and will there be provision for staff or guest car parking? There are access points into the courtyard from Regents Park Road and Adelaide Road. Will both access points be used for vehicular access? I recommend that these points be gated with a security rating of LPS 1175 SR1. Key fob access with a video/audio intercom connected to reception. The gate would require an auto close feature to prevent tail gating. The height of the gate should be a minimum of 1.8m to 2.1m (dependant on local planning permissions). The gates should not be recessed to avoid presenting a concealment opportunity. Weld mesh could also be considered to protect this area. If a press to release type system should be used then this cannot be reachable from the public realm. Consider the location as well as the inclusion of a protective cowl.
- The cycle store is for staff only. Secure racks need to be set into the ground to ensure screws and bolts are not exposed. The racks should allow for three points of locking. The door to the cycle store should be a minimum rating of PAS24: 2016 with key fob access. It is recommended that data logging also be installed.

Building Interior

- The basement level which houses five (5) hotel guest rooms is in the same corridor as the staff changing rooms as well as utility rooms. I recommend an additional door security rated to PAS24:2016 with encrypted key fob access to ensure the staff area is not accessible by guests.
- The fourth floor includes access for guests to use the roof terrace. It is strongly recommended that the door be security rated to LPS 1175 SR1 or STS 202 BR1 and have encrypted key fob access with data logging. The roof terrace should be managed and it is recommended that it be closed to all guests overnight to prevent it becoming a location where guests could congregate and take alcoholic drinks and cause antisocial behaviour for local residents and other hotel guests.

- It is recommended that an additional door rated to PAS24:2016 be installed just to the South of the entrance to the roof terrace. This will need to have encrypted key fob access. This is due to the fact that all guests will presumably have access to the roof terrace and by having an additional door you are offering more privacy for the guests staying on that floor.
- No access to the roof.

Other Considerations

- PAS24:2016 windows for any accessible windows from the public realm. It is recommended that glazing to a minimum standard BS EN 356 2000 class P2A (or above). This is the same for any communal door with glass panel viewer.
- Anti-graffiti treatments for exposed gable ends. There are treatments for both concrete/brick as well as metal textured materials. Also consider defensive planting or a rail or a combination of both to create a defensive space and provide a layer of additional security.
- CCTV with complimentary lighting to be considered for the exterior/entrance and communal areas (internal). A formal, overt CCTV system should be installed and maintained by a member company of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB). Any such company will install a system to the British Standard. Images should be retained for a minimum of 30 days. This system would need to be registered with the Information Commissioner's Office, as it would be recording public areas. Appropriate signage indicating this fact needs to be displayed.
- Compartmentalisation should be incorporated. This means that the lifts and stairwells need to have encrypted key fob access. In reality if a guest has a room on the second floor. He should only have access to the second and fourth floors (fourth floor roof terrace amenity). This ensure control of access for guests and mitigates the risk of opportunistic crime. Data logging should be installed to inform the management who has accessed or tried to access certain areas.
- It is strongly recommended that if WIFI is going to be installed then this be password protected and for hotel guests only. Free WIFI can attract groups to linger and hang around the building/façade which could lead to antisocial behaviour.

Further consultation is required in the pursuit of achieving SBD certification for the development.

If yourself or the applicant wishes to discuss any of my recommendations further then please feel free to contact me. The advice I have provided has been taken from the following guides:

https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf
https://www.securedbydesign.com/images/downloads/SBD_Commercial_2015_V2.pdf

The advice has been adjusted taking into consideration crime statistics and analysis of the area. Further consultation is required in the pursuit of achieving SBD certification for the development.

Kind regards

Aran



Police Constable Aran Johnston
Design Out Crime Officer
 Continuous Policing Improvement Command (CPIC)
 5 The Oaks, Ruislip, Middlesex, HA4 7LF
 w: www.met.police.uk e: [REDACTED]

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