

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Good Afternoon,

Thank you for allowing me to comment on 2021/1808/P Discharge of condition 24 (CCTV, lighting and security lighting) for Phase 2 only of planning permission 2013/3807/P granted on 30th March 2015 by the Greater London Authority (for new buildings of 5-15 storeys, 345 dwellings, 823sqm of flexible retail and community floorspace and associated works).

I have referred this to a lighting design specialist and they have had the following comments to make:

- ∞ Lighting impact assessment – overall they have detailed a reasonable assessment of the requirements for the site but that is as far as the good points go.
- ∞ Some of the luminaire choices put forward are not suitable, such as spike lights which are more for domestic use.
- ∞ The luminaires have various colour temperatures which shouldn't be mixed on a site as they will detract from the desired aesthetic of the development.
- ∞ Bollards should obviously only be used where they are for decorative or wayfinding rather than area lighting.
- ∞ The inground lights are likely to be vulnerable so should only be used where they are visible to natural surveillance and should only be used for wayfinding and not for actual lighting purposes.
- ∞ The EX7 light is a very poor choice for emergency lighting as it's more suited to commercial buildings and would look awful in a residential setting.
- ∞ The demonstrated Dialux lighting design outputs within the report do not show a compliant lighting design and it's unclear which luminaires are being used and/or where they are located.
- ∞ The lux levels, uniformity and calculation grid points do not seem to reflect anything from any British Standard I am aware of and are therefore non-compliant for SBD purposes (if this is something that the project is pursuing).
- ∞ For the design to meet good lighting practice in general and not just SBD compliance it should be completed by a competent, qualified and experienced lighting designer who can demonstrate lighting competency. It's not just SBD this design wouldn't meet.

We need proof of the designer's competency, qualifications and experience in the field of lighting design, that is your first and most important criteria to be met before any assessment of any submission is ever made. Once you have that, and only after you have that, should any further review of a design be completed as if it's not there it will never be SBD compliant.

- ∞ The position of the CCTV cameras is adequate but without the necessary complimentary lighting to ensure colour recognition and facial identification the CCTV system may not reach its full potential.
- ∞ 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.

Lighting is key and for residents it is imperative that this is done correctly. If the development is well lit natural surveillance will increase. With increased light levels the risk of concealment is also lowered. Visibility lowers the fear of crime making the residents/building users feel safer.

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/HOMES_BROCHURE_2019_update_May.pdf)  
[https://www.securedbydesign.com/images/downloads/SBD\\_Commercial\\_2015\\_V2.pdf](https://www.securedbydesign.com/images/downloads/SBD_Commercial_2015_V2.pdf)

I have also provided advice from the safer parking scheme (Park Mark)

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



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