

From:

Sent: 29 June 2021 08:17

To: Planning

Subject: Scoping Comment for 2021/2770/P O2 Centre Finchley Road site

Good Morning,

Thank you for allowing me to comment on the proposed development of the O2 centre Finchley Road. There has been one meeting between the architects and design out crime from a security needs point of view. Early plans were shown and raised issues discussed.

With no real details on the design and layout at this application my comments will be general to the area, as befits a scoping opinion. Should permission be granted for this development, I would ask for buildings to obtain Secured by Design certification via early engagement, for the following reasons.

Crime Trends

The proposed location of the development has the site sandwiched between railway lines as well as the A41 and B510. The site is large and from the outset could have issues with permeability and opportunistic crime. Both crime and antisocial behaviour are key considerations for this proposal as illustrated in the crime figures obtained from the police.uk website. This area comes under the policing ward of West Hampstead. Antisocial behaviour, violence and sexual offences, vehicle crime and public order were the top reported issues for the month of May 2021.

Top reported crimes	
Most commonly reported crimes during May 2021	
Anti-social behaviour	64
Violence and sexual offences	35
Vehicle crime	29
Public order	11
Get crime prevention advice	

The graphic above is for the most commonly reported crimes for West Hampstead ward. The figures have been taken from the Police UK website. The theme of the crimes are consistent on a month by month basis going back to 2019.

Crime and ASB as material considerations for this site:

The scoping report makes several references to potential receptors which may be impacted by the proposed development and may need to be considered as part of the assessment. Two of the receptors are directly relevant to crime and disorder: Socio-economics and Health (pages 91 and 23). Crime and disorder are relevant considerations and need to be addressed. In socio-economic terms, the current crime trends in this area can have a negative impact upon the quality of life for both residents and businesses and could continue to do so for future residents and workers on this proposed site. I could not find a Health Impact Assessment (HIA) attached to this application. A safe development with low rates of crime and ASB will also have a healthier and happier community which will be less worried about crime and the fear of crime and will not be exposed to its side effects.

Initial concerns from the site:

There are several concerns for this proposed application. Access onto the site is of note. The current main access route is A41 Finchley Road, with secondary access via B150 from Blackburn Road. There is also pedestrian access from B150 via Billy Fury Way. Permeability in the form of footpaths needs to be considered carefully as 'leaky' developments (with secluded footpaths) can be a breeding ground for anti-social behaviour and crime. A multi-use common access route is preferred where there is vehicular movement, pedestrian traffic and cycle lanes. This enables a good level of vehicle use and footfall boosting the natural surveillance along key routes into the site. There should be no separate footpaths as these are often poorly overlooked and can be flash points for street crime including robbery type offences as well as sexual assault and other violent crime. If light industrial mixed use will occupy ground floor space with residential units above this should be considered carefully, as after a certain time (1700/1800 hours) there will be much reduced legitimate activity around these ground floor areas. This will reduce the footfall and natural surveillance and produce an environment where groups could gather, the result of which could be an increase in ASB. With groups loitering and associated rowdy behaviour, this will increase the fear of crime for the residents - some of whom may be reluctant to venture out after a certain time.

For blocks of residential units access control and compartmentalisation will be key to mitigating the risk of anti-social behaviour and acquisitive/opportunistic crime. Drugs are also a key issue for the borough of Camden and the development must not become a kindly habitat for gangs to enter and take control.

There is already a large night time economy for the borough of Camden and this could overspill into the new development. This along with a proposed licensed premises on the initial plans viewed at an earlier meeting with the architects could have a detrimental effect for the businesses and residents on the site.

Permeability will be a key factor as there is already a burglary and opportunistic theft trend for the area. Landscaping will also be important. Lines of sight, lack of concealment opportunities, reduced opportunities for group seating/gathering.

The development may wish to be car free; such proposals may be difficult to manage in reality, as residents and workers may resort to parking in nearby roads thereby increasing traffic pressure in the surrounding area. Should the development seek to include car parking,

careful consideration will be needed about appropriate parking areas. Open under crofts and insecure underground car parks can become plagued with crime and ASB, especially in areas with an active drug scene.

Similar developments within Camden:

Referenced on p19 and p20 of the report are numerous developments with applications similar to this, such as the 156 West End Lane, Abbey Road, The Avenue and Liddell Road. All have benefited from the advice of Met Police design out crime officers. The proposed site should be no different and should be conditioned to achieve SBD certification.

I therefore propose that crime and disorder are material considerations for this site as described within the scoping report. These concerns can be allayed by the council agreeing to a condition for the development to achieve Secured by Design certification for all phases prior to occupation including residential, commercial and educational areas, to be maintained in line with SBD certification thereafter. This will require ongoing engagement at an early stage of each phase between the designing out crime officer and the development team.

The NPPF and Camden's own local guidance can support this proposal:
Section 91 of the NPPF states:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”

Section 127 of the NPPF further adds:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”

Taken from the Camden Supplementary Guide to Design (January 2021 revision)

- The Council requires that developments demonstrate that they have been designed to contribute to community safety and security.
- Security features must be fully considered and incorporated at an early stage in the design process.
- Designing-against crime features, safe access and security measures must complement other design considerations and be considered as part of a holistic approach to designing and maintaining safer environments for all.
- Better designed environments support safer and healthier communities.
- Consideration will be given to the impact of measures on the surrounding area to ensure that there is not displacement of activity into surrounding neighbourhoods.
- Safer environments support healthier communities.

In accordance with Local Plan Policy C5 Safety and Security, the Council will require applicants to demonstrate that all impacts of their proposal on crime and community safety

have been considered and addressed. Applicants should be able to demonstrate that they have consulted Met Police Designing Out Crime Officer (details of which can be found at www.securedbydesign.com) and that proposals take into account the advice given and achieve Secured by Design certification, where appropriate.

Policy C5 Safety and security (From the Camden Local Plan)

The Council will aim to make Camden a safer place. We will:

- (a) work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- (b) Require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- (c) Require appropriate security and community safety measures in buildings, spaces and the transport system;*
- (d) Promote safer streets and public areas;*
- (e) Address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design; and*
- (f) Promote the development of pedestrian friendly spaces.*

We strongly encourage security features to be incorporated into a scheme from the beginning of the design process and complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in our supplementary planning document Camden Planning Guidance on design.

It is important to take a proactive approach at an early stage to reduce risks and opportunities for crime and ASB to occur, rather than relying on reactive measures such as CCTV, which should only be used as part of a package of measures to reduce crime. Incorporating designing out crime features into a development should complement other key design considerations and high quality architecture and design should still be achieved. Considering good design early in the design process will lead to a better quality development overall.

The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would encourage antisocial behaviour. The use of the site and layout should also be carefully considered as these can also have a major impact on community safety.

From the Camden local plan;

“ Camden's food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be assessed in line with our town centre policies, particularly Policy TC4 Town centre uses and Policy A1 Managing the impact of development. The Council will also take into consideration any concerns raised from stakeholders within adjoining areas beyond Camden's boundaries. Alcohol related

crime and late night disorder have been identified as significant issues, particularly within Camden Town and the Seven Dials area of Central London. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and special licensing policies apply to these areas."

Kind regards

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