

Mohammed Ahmed

From: [REDACTED]
Sent: 31 August 2021 22:04
To: Planning Planning
Subject: Marie Fidelis School Recommendations - Planning reference 2021/3796/P

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FAO Patrick Marfleet

Good Evening,

Thank you for allowing me to comment on the Erection of a six-storey combined Construction Skills Centre (Use Class F1) and HS2 Site Accommodation (Use Class (E) as temporary meanwhile uses to facilitate the construction of HS2 Euston Station on the Land at the former Maria Fidelis School Starcross Street London NW1 2LY Planning reference 2021/3796/P.

I have no objections to the development but have the following comments and recommendations.

I have had a meeting prior to this application going to planning. Some of my comments and observations have been highlighted within the design and access statement. I attach a list of observations below from the pre application meeting:

Marie Fidelis School Development Meeting 12/02/2021

Construction Skills Centre

It was discussed that the construction skills centre (CSC) on the site will occupy the ground and first floors with the additional floors above set aside for the construction site workers from HS2.

- Compartmentalisation must be achieved. There should be no areas of crossover between students and faculty/office staff from the building to the South and construction site workers. Crossover can lead to potential conflict. With compartmentalisation in place and access control the risk of assault, sexual offences, and opportunistic theft is greatly reduced.

It was mentioned that the HS2 construction staff would access the site from the North and this would be through some form of staffed biometric turnstile.

- Providing a separate entrance for staff assists in achieving zero cross over. Having a dedicated stairwell to access the floors dedicated for HS2 ensures compartmentalisation.
- It is important that the doors entering the CSC from this stairwell which is accessed by HS2 workers cannot be accessed. Consultation with a fire consultant or building control would have to take place but it is recommended that the stairwell be accessible for emergency egress only.

The security on entering the building needs to be viewed. There is a main entrance to the CSC for students and faculty. This should be the only entrance so as any visitors or potential trespassers can be vetted by the reception. Access control in the form of a student card entry system with data logging facility was mentioned. This is key as it mitigates the risk of unauthorised persons gaining access to the CSC and HS2 staff area above. Student access cards should have the facility to be easily cancelled or re-programmed if compromised. The doors entering the building need to have an auto-close feature to prevent tail gating. CCTV is key at this location.

- Consider a visual/audio intercom at the main entrance door for staff at reception to vet any potential visitor prior to permitting entry.

- The mail strategy should be reviewed also due to the sensitive nature of the HS2 project. Any mail for the HS2 site should be managed separately and away from the CSC.

The cycle store to the right of the CSC for staff and students should be looked at. There appears to be too few rooms with continuous activity to assist in natural surveillance. The inclusion of further windows may assist if those rooms are occupied during the day.

- Additional security gate which is key fob/student card accessed should be incorporated. This will greatly reduce the risk of bicycle theft occurring from people wandering in from the public gardens. The gate should be auto-closing/locking to prevent tail gating.
- The location of the cycle store should be reviewed as it may pose a climbing aid which provides access to an external staircase and also the hoarding for the HS2 site and proposed substation. CCTV should be utilised at this location.
- Inside the CSC any areas which house expensive equipment and materials such as tools, laptops, and copper/lead materials should have a higher security rated door. External windows into these areas should also have a high security rating and the expensive items hidden from public view.
- All hoarding and areas of the boundary which suffer with insufficient natural surveillance should be bolstered with CCTV.
- Separate bin stores for the CSC and the HS2 site was shown on the drawings during the meeting and is key. If these stores are easily accessed from the public realm then a suitably security rated door needs to be installed. Bin stores often attract numerous forms of antisocial behaviour including drug users and places for public urination. The store should also not provide access in the main building from inside the store.

Landscaping

The landscaping of the public accessible gardens should be ground level planters to assist with visibility. There should be no clustered seating as this can lead to groups congregating and the likelihood for antisocial behaviour increases. With raised beds you provide further seating opportunities and also areas for potential concealment. This can make it easy for secreting weapons and drugs. By having the garden area open staff and students can see if there are any persons of concern massing in that area. With the HS2 project highly emotive for some the risk of protest groups using this area is high.

- Consider strategic defensive planting for areas off of the public gardens which would be considered vulnerable. Also consider railings with reasonable boundary heights for these areas. Check with the local planning department in the first instance.
- Defensive planting can be used in other locations to add an additional protective layer to vulnerable sites.
- The public garden is fenced and gated and it has been mentioned that this will be closed during hours of darkness and managed by Camden. When the main gates are closed students and staff will use the out of hour's entrance. This needs to have access controls and a security rated gate. The metal gate should be visually permeable to users can see who is waiting on the other side. The gate should have an auto close feature to prevent tail gating.

I advise that input be sought from a Counter Terrorism Security Advisor (CTSA) prior to planning. I can provide contact details for the officers that cover this area to see if they wish to provide comment or wish for any further security measures to be added.

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

If yourself or the applicant wish to discuss any of my recommendations further then please feel free to contact me. Once the design has been finalised I am happy to recommend specific security ratings for doors, windows and the like.

The below text has been taken directly from the design and access statement:

FBM met with the Designing out Crime Officer (DOCO) of the Metropolitan Police at an early stage in the design process with the aim to achieve Secured By Design (SBD) accreditation for the scheme. Sited in an area in which

anti-social behaviour has been a considerable issue, the following strategies seek to prevent crime through its design: It was discussed that the construction skills centre (CSC) on the site will occupy the ground and first floors with the additional floors above set aside for the construction site workers from HS2.

- ∞ Compartmentalisation must be achieved. There should be no areas of crossover between students and faculty/office staff from the building to the South and construction site workers. Crossover can lead to potential conflict. With compartmentalisation in place and access control the risk of assault, sexual offences, and opportunistic theft is greatly reduced.
- ∞ It was mentioned that the HS2 construction staff would access the site from the North and this would be through some form of staffed biometric turnstile.
- ∞ Providing a separate entrance for staff assists in achieving zero cross over. Having a dedicated stairwell to access the floors dedicated for HS2 ensures compartmentalisation.
- ∞ It is important that the doors entering the CSC from this stairwell which is accessed by HS2 workers cannot be accessed. Consultation with a fire consultant or building control would have to take place but it is recommended that the stairwell be accessible for emergency egress only. The security on entering the building needs to be viewed. There is a main entrance to the CSC for students and faculty. This should be the only entrance so as any visitors or potential trespassers can be vetted by the reception. Access control in the form of a student card entry system with data logging facility was mentioned. This is key as it mitigates the risk of unauthorised persons gaining access to the CSC and HS2 staff area above. Student access cards should have the facility to be easily cancelled or re-programmed if compromised. The doors entering the building need to have an auto-close feature to prevent tail gating. CCTV is key at this location.
- ∞ Consider a visual/audio intercom at the main entrance door for staff at reception to vet any potential visitor prior to permitting entry.
- ∞ The mail strategy should be reviewed also due to the sensitive nature of the HS2 project. Any mail for the HS2 site should be managed separately and away from the CSC. The cycle store to the right of the CSC for staff and students should be looked at. There appears to be too few rooms with continuous activity to assist in natural surveillance. The inclusion of further windows may assist if those rooms are occupied during the day.
- ∞ Additional security gate which is key fob/student card accessed should be incorporated. This will greatly reduce the risk of bicycle theft occurring from people wandering in from the public gardens. The gate should be auto-closing/locking to prevent tail gating.
- ∞ Inside the CSC any areas which house expensive equipment and materials such as tools, laptops, and copper/lead materials should have a higher security rated door. External windows into these areas should also have a high security rating and the expensive items hidden from public view.
- ∞ All hoarding and areas of the boundary which suffer with insufficient natural surveillance should be bolstered with CCTV.
- ∞ Separate bin stores for the CSC and the HS2 site was shown on the drawings during the meeting and is key. If these stores are easily accessed from the public realm then a suitably security rated door needs to be installed. Bin stores often attract numerous forms of antisocial behaviour including drug users and places for public urination. The store should also not provide access in the main building from inside the store.

It is not certain what aspects of the recommendations listed above have been taken into consideration from the pre application to application phase and appropriate design changes made.

Further to the above the HS2 construction is a hugely divisive subject. The public park area which is proposed is not greatly overlooked with little activity aside from the college, local residents and HS2 site staff. It is recommended that this park area fall into the grounds of the CSC and be private at this time.

- ∞ Access control points to be placed at the gates entering the park area which needs to include encrypted key fob with data logging to record usage. This will reduce the risk of potential protestors entering this area to disrupt the HS2 project and the CSC daily use.
- ∞ I recommend that the fencing and gates around the park area be security rated to LPS 1175 SR2. The gate will require an auto close feature to prevent tail gating. The auto close needs to be protected so that it cannot be disabled or tampered with from the public realm. The height of the boundary should be a minimum of 1.8 metres (dependant on local planning permissions).

Post construction the park is still not greatly overlooked and suffers with a lack of natural surveillance. There are some residential units opposite. It is believed that without the local authority locking the gates overnight this area will become an antisocial behaviour hotspot. I know this has been mentioned but it must be emphasised that an insecure park at this location will cause issues in the future.

Kind regards

Aran



Police Constable Aran Johnston
Design Out Crime Officer
Continuous Policing Improvement Command (CPIC)

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