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Date: 08th September 2021

**Reference: 20/5698/FUL**

Good Evening,

Thank you for allowing me to comment on the proposed **change of use of no. 108 from betting shop (Sui Generis) to adult gaming centre (Sui Generis) to be amalgated with adult gaming centre at 110 Camden High Street, with provision of new shopfront for the enlarged unit (108-110 Camden High Street. See 2021/3073/A for associated shopfront signage at 108-110 Camden High Street London NW1 0LU. 2021/3226/P refers.**

I have reviewed the crime rates in the local area of the proposed application on [Police.uk](https://www.met.police.uk) and I have noted that the highest recorded issues impacting the local ward of Camden Town with Primrose Hill are anti-social behaviour (ASB), violence & sexual offences, other theft and theft from person.

The London Borough of Camden as an entirety has a higher than average rate of antisocial behaviour owing to its large night time economy. Please see appendix for crime statistics.

It is noted that this application refers to a change of use from a betting shop to an adult gaming centre to become a larger unit for the pre-existing gaming centre next door, with proposed 24 hour opening times.

There are already high levels of ASB and issues with street drinking in this immediate area. There is a concern that these levels of ASB will increase further with the introduction of a larger gaming venue, especially with its proposed 24/7 operating hours.

There are numerous reports of theft from person (distraction/pick-pocketing etc) made to police within this area in the past 24 months and this leads to concerns that patrons using this facility could be targeted, especially during hours of low activity and natural surveillance along this road (darkness, early hours of morning etc).

Levels of burglary upon the ward and within the London Borough of Camden in general are moderate to high, therefore it is important to consider and incorporate physical security elements to help protect any building and its staff from crime and disorder where possible. There is no explicit mention

of the incorporation of any security rated products to help protect this facility from burglary. It is noted that these premises are located within a listed/conservation area and may be subject to various restrictions, however bespoke security recommendations for the building should be possible such as secondary security rated door-sets, security rated laminate for curtain walling and so on.

Access control and the main entrance proposal appears to be a little ambiguous. The main entrance appears to have presumably an automatic bi-fold door set which is activated when people approach. This provides access to a small lobby area with doors to the left and right providing access into the facility. It is not known how entry will be granted at this point. It has not been stated whether the secondary doors will be open throughout or whether they are secured with a maglock system which is released by floor staff once the guest has been suitably vetted. With 24/7 access proposed and no apparent audio & visual access control, an open and easily accessible door-set could be a security and safety risk to staff and patrons.

Although there is an 'office' located within the premises, it is unclear if this is a secure area or 'safe space' upon the shop floor that staff can retreat to and secure the door in an emergency. This is also located some distance from the entrance and does not appear to have any visibility of the shop floor in the event of an unwanted or aggressive visitor.

The applicant has stated that staff at the venue will have a system whereby a link between the employee and a control centre is established if problems with patrons arise. The link will be with both audio and video. If the situation cannot be resolved then police may be called. This system in my opinion still carries an element of risk for the employee. Response times for the call centre maybe effected during peak hours and this could cause a delay and increase the risk for the staff member. With the call centre remote and not local it is felt that issues which cannot be resolved will be reliant on local policing resources which are already overburdened. CCTV was not detailed but will be included as part of any licensing conditions. These are vital components to the operating nature of this type of premises and there does not appear to be any mention of this within their planning documentation.

It is not known whether there is any safe or strong room for these premises to help protect levels of cash that could be stored within the building. Obviously this would not be highlighted upon any planning documentation (accessible upon the public portal) for obvious reasons, but is an important component of any security strategy for the premises.

I can confirm that I have not yet met with the project architects or agents to discuss their intentions regarding this development around Crime Prevention or Secured by Design (SbD). The design and access statement makes little to no reference or mention of crime prevention or security rated products being considered for the proposal.

**I am unable to support this application for a proposed change of use.**

If planning permission is granted then I recommend attaching a condition for the development to achieve Secured by Design accreditation.

Section 17 of the Crime and Disorder Act 1988 states "It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise

of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it's area", as clarified by PINS953.

The National Planning Policy Framework (NPPF) states that "Planning policies and decisions should aim to ensure that developments create:

- ***Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion***

Creating a sense of place where legitimate users are able to go about their daily routine without unduly fearing crime or insecurity is a key element of the Secured by Design initiative.

The services of the Police Designing Out Crime Officers (DOCOs) are available free of charge and can be contacted via the details shown above.

### **The National Planning Policy Framework (NPPF)**

#### **Section 8 states**

*"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion..."*

#### **Section 12 states**

*"Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

### **Camden Local Plan**

4.84 Crime and the fear of crime can undermine people's quality of life, health and wellbeing. Planning plays an important role in reducing crime and helping to create safe and secure places. Our challenge is to make the borough a safer place for everyone, while making sure that Camden maintains the vibrancy that contributes so much to its character and success. The following policy will help us make Camden a safer place.

Policy C5 Safety and security 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.

Appendix

Crime figures



The image above clearly indicates an increase in crime levels with the easing of lockdown restrictions.

