

Parnjit Singh

From: Aran.LJohnston@met.police.uk
Sent: 01 November 2021 07:12
To: Planning Planning
Subject: Planning comment for Minerva House 2021/3704/P

Good Afternoon,

Thank you for allowing me to comment on the **refurbishment and reconfiguration of the existing buildings; including a one storey extension, plus plant, demolition works associated with internal and external alterations to provide additional office accommodation; landscaping works and other associated works at Minerva House & Telephone Exchange, 1-4 North Crescent and 5 North Crescent, London, WC1E 7PH (2021/3704/P refers)**

This location falls into the policing ward of Bloomsbury. The top reported crimes for the month of September 2021 (taken from the police.uk website) are other theft, antisocial behaviour, violence and sexual offences and theft from the person. This ward is popular with tourists and as such the crime figures support this with a higher than average rate for street crime offences. There is also a large street population within this area. The figures are indicative going back for the last three (3) years. Crime overall is down but appears to be rising to pre-covid levels

I tried emailing the architect on the general enquiries mailbox regarding this project with a view to setting up a meeting but had no reply. This comment is therefore without further information other than what has been made available on the building application portal.

With the landscape design in its current form I cannot support this application. My reasons will be explained in the below comments which incorporate the whole project and not just the landscaping proposal.

Landscape and outside areas

The plans show raised planters with large seating areas. I am not against street greening but this area directly outside Minerva House and the telephone exchange is poorly observed. It is situated behind the Eisenhower Centre which is an imposing structure and due to its historical significance will remain so. The building reduces natural light levels in this area. Where there may be activity during the working week this will not exist when the businesses are closed in the evenings, overnight and possibly at weekends. It is strongly believed that this area will be prone to antisocial behaviour. Groups that gather in this location will be concealed from general view and this will lead to noise issues, street drinking, drug taking and using the area as a public toilet. There is a large street population in this area. UCL have had people set up camp in recessed doorways. The Heal's and Son's building is regularly attended by outreach workers as they are aware of the numbers that congregate in this area. The American church a short distance away also provides a soup kitchen service. It is felt that this proposed area will be inviting and this may put off other members of the public attending the location. To avoid gating off the crescent overnight I recommend the following:

- Remove the raised seating areas and replace with ground level planting. Use defensive planting to prevent areas of possible concealment where people could loiter or go to the toilet. Defensive planting can also be used to add an extra defensive layer to vulnerable areas.
- Any seating provision to be set up each day by the management of the buildings and removed at the end of the day.
- Consider textured brickwork which encourages movement as opposed to congregating for long periods of time.

There is construction already underway for a park area called Alfred Place which is seconds walking distance from Minerva house and the telephone exchange. Is this further area required for more park? With its poor surveillance and opportunities for concealment in my opinion it is not.

Removing the road/vehicle access could reduce activity and invite more persons into the crescent (but not necessarily for legitimate reasons). This could lead to an increase in street and opportunistic crime. Without a pronounced kerb indicating footpath from highway pedestrians and cyclists/e-scooters could come into conflict as it is not clear who if any would have priority. It could also make bicycle or scooter enabled theft from person easier.

- External Lighting to achieve BS 5489-1:2020 and BS EN 12464-1:2002, and for emergency lighting to pedestrian areas to comply with BS 5266-1 .and be complementary to any proposed CCTV system.
- Anti-graffiti treatments for exposed gable ends. There are treatments for both concrete/brick as well as metal textured materials.
- 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.

Cycle parking should be located where the greatest amount of activity and natural surveillance can be achieved. I do not feel the current location is suitable for this and the cycles parked there will be susceptible to theft and criminal damage. The design and access statement makes reference to the cycle stands being 'Sheffield style'. If any cycle stands are to be considered I recommend 'London style' over Sheffield. The London stand has a tapping bar between the two posts. When the user parks their bicycle and places the locks above the tapping bar any potential thief cannot move the position of the lock to the floor where it can be easily forced with a blunt instrument. The stand should also be set into the ground so no bolts are exposed. The tubing of the stand can also be filled with concrete or other form of suitable aggregate in order to increase the weight and overall robustness of the stand.

The telephone exchange

There are two (2) main entrances into this building as well as two (2) ramped access to a lower ground or basement level. There is mention of shared use within the building. Is there a reception desk to act as a focal point for visitors? If so then this should be centrally located opposite the main entrance to ensure persons entering the building can be clearly directed.

- Dependant on material and design constraints (if this is in a conservation area) then I recommend that the main entrance doors be security rated to LPS 1175 SR2 or STS 202 BR2 (if steel/aluminium is acceptable) or PAS24:2016 if solid core wood is required.
- Access control for the building in respect of the two (2) tenant split will assist in keeping areas of crossover to a minimum. This can be achieved through encrypted key fob access control on the door sets.
- CCTV is recommended for the main reception area and communal areas of the block.
- Alfred Mews is the road where servicing and management will access such as waste collection. There will also be emergency egress from two (2) stair cores into this location. The mews is not greatly an active area and where there may be some surveillance from the neighbouring buildings during the day this will drop significantly overnight. I recommend LPS 1175 SR2 or STS 202 BR2 door sets for any access required from this location. The fire exits should not be recessed. The road is a dead end and therefore opening a door onto a public highway should not be as much of an issue here. This will mitigate against the doorway being used as a concealment opportunity or a public toilet. The fire doors should not allow opening from the public realm. The fire exits should also be alarmed. This would prevent employees from leaving the door propped open.

Minerva House

The lower ground area needs to be controlled. It offers shelter and is out of view from any surveillance. This area could be prone to antisocial behaviour.

- On the lower ground area the louvered screen and door should be replaced with security rated products. I recommend PAS24:2016 or LPS 1175 SR1 (or above). Unless secured persons could remain in this area undetected to attack these features and gain entry. CCTV and lighting should also be considered for this area.
- Replace the door in this area to either an LPS 1175 SR1 (or above) or an STS 202 BR 1 (or above) or PAS24:2016. Again this location is below street level and prone to attack.
- Windows at this location need to be replaced with PAS24:2016 enhanced glazing to P4A. Consider also an internal grille rated to LPS1175 SR1.
- Both main entrance door from ground level to be replaced with either PAS24:2016 (for wood material) LPS 1175 SR2 or STS 202 BR 2 (if metal).
- The glazed window entrance doors to be enhanced glazing to be P4A. Consider a retractable roller shutter for this location or an internal retractable grille to LPS 1175 SR2.
- P4A enhanced glazing for all ground floor and publicly accessible areas.
- Avoid recesses where possible.
- External Lighting to achieve BS 5489-1:2020 and BS EN 12464-1:2002, and for emergency lighting to pedestrian areas to comply with BS 5266-1 .and be complementary to any proposed CCTV system.
- Anti-graffiti treatments for exposed gable ends. There are treatments for both concrete/brick as well as metal textured materials.
- 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.
- Access control by way of encrypted key fob with data logging facility. This can control of the movement of persons within a building. Persons can be granted access with a pre-programmed key. This will record when they entered a room or even tried to access a room which is prohibited. The cancelling of key fobs (if found to be misused) is easier and more cost effective than changing locks every time.
- Internal cycle stores should have two (2) defensive lines. I recommend that the first door at the bottom of the ramps are security rated to either PAS24:2016, LPS 1175 SR1 (or above) or STS 202 BR2 (or above). Access control through encrypted key fob with data logging to record use. The door should be single leaf with an auto close feature to mitigate the risk of tailgating. The second line of defence should again be access controlled with a security rated door to PAS24:2016. The stands within should be secured and set into the floor or wall so that no bolts are displayed. The stands should allow for three (3) points of locking. If the site has numerous tenants then consider separating the cycle storage so there is no crossover and neither company can access the others cycle storage area.
- Alarm ground floor fire exits. These could provide easier means for entering the building. If they are not alarmed they could be prone to being propped open in the summer months allowing for an unsecured backdoor in to the site.
- I recommend an intruder alarm for the site.
- Reception desk if considered should be centrally located. This is to avoid confusion for guests and also to allow for good surveillance over the main entrance.
- Higher SR for doors providing access to expensive equipment or sensitive material. Consider LPS1175 SR 1 (or above) or PAS24:20016.
- External brickwork around the doors could be climbable. Consider either making the windows above non – openable or have them on restrictors. PAS24:2016 windows are recommended. If this cannot be achieved on the outside then look at secondary glazing on the inside.

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/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



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