

**From:** [REDACTED]  
**Sent:** 23 November 2021 13:39  
**To:** Planning Planning  
**Subject:** DOCO planning comment for in-link replacement on Tottenham Court Road (2021/3910/P, 2021/3911/P, 2021/3912/P refers)  
**Attachments:** [Tottenham Court Road inlink applications v.3.pdf](#)

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Good Afternoon,

Please find attached the comments for the proposed BT in-link applications for four (4) locations along Tottenham Court Road. Please feel free to contact me regarding any of the comments or recommendations that I have made.

Kind regards

Aran



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



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Good Afternoon,

Thank you for inviting the Metropolitan Police to comment on the multiple planning applications regarding:

**Communication hub (InFocus/JC Decaux) at numerous locations along Tottenham Court Road**

I have reviewed the crime rate in the local area for each proposed development on [Police.uk](https://www.police.uk). There has been meetings with BT inlink to discuss the design of the device and how it could impact on antisocial behavior and crime levels if not done correctly. Through this consultation the applicant has made several key design changes to the device, such as removing what would more than likely have been a problematic charging 'shelf' amongst others. These are positive changes from a crime prevention perspective.

The inclusion of a management plan is a very important factor of these applications, as this will set out the strategy for the ongoing management of each device. It is very positive that this strategy will remain flexible, as crime patterns and trends can change/evolve over time and ongoing liaison between all relevant parties will remain an essential part of the process.

There is a facility to block free calls to mobile phones and barring certain problem phone numbers from using this hub. This is an excellent approach in assisting with crime prevention measures with any installation of this device. From previous experience of the installation of a very similar device in London (from another organisation), free calls to mobile telephone numbers led to a serious increase in drug related reports and offences. This obviously attracted other issues such as violence and disorder in and around the vicinity of the device. Therefore the inability to make free calls to mobile telephone numbers from these units is a very positive aspect of the application.

Regarding these applications, I would like to comment upon each proposal as follows:

All proposed locations fall within the policing ward of Bloomsbury.

## Top reported crimes

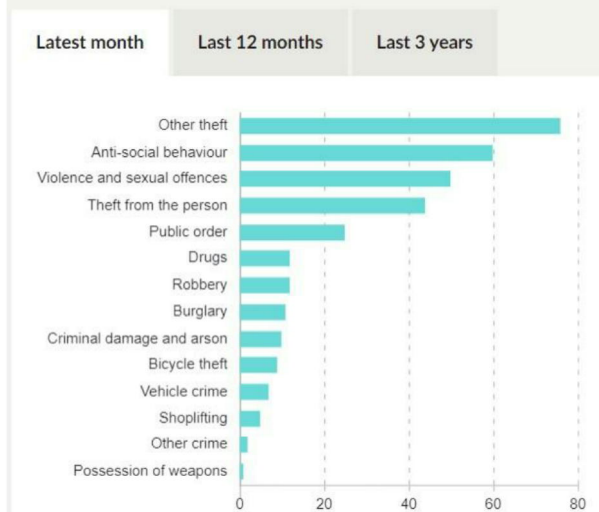
Most commonly reported crimes during Sep 2021

Other theft	76
Anti-social behaviour	60
Violence and sexual offences	50
Theft from the person	44

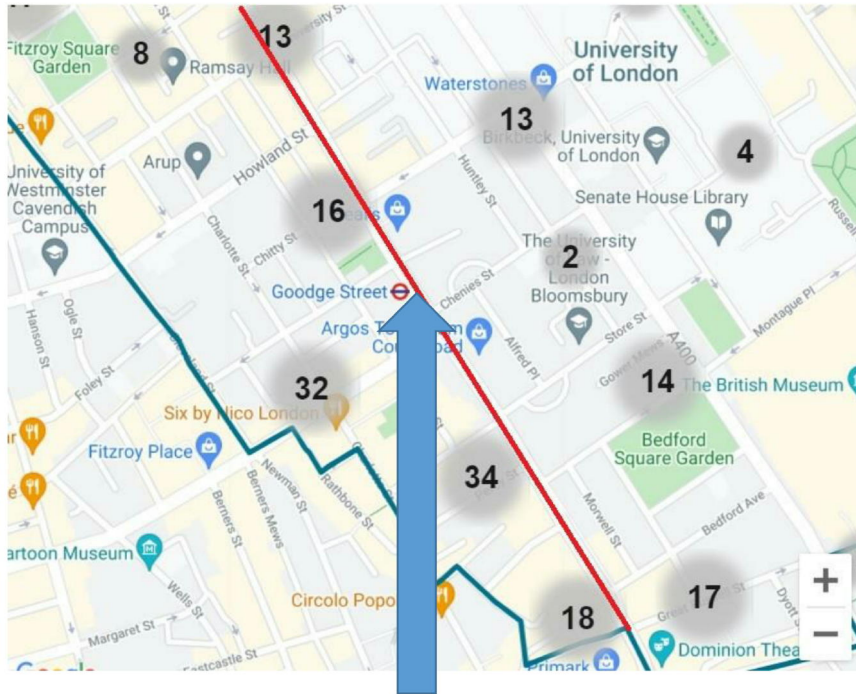
*Above are the top reported crimes for the month of September 2021 taken from the police UK website.*

## Crime types description

for the latest month (Sep 2021)



*Above are the crimes types by definition that occurred in the month of September 2021 taken from the police UK website.*



*This is the crime map for the month of September 2021 taken from the police UK website. Highlighted in red is Tottenham Court Road. It is evident from this graphic the amount of crime through this area of London.*

In relation to the locations of the kiosks around Tottenham Court Road there is a common theme among the crime statistics. All these areas have a major issue with street crime and in particular antisocial behaviour, pickpocketing and theft from person. These are areas of significant footfall with both commuters, local residents and numerous tourists. The design of these kiosks does not reduce the risk of these types of crime from occurring. Due to the openness of the kiosk any mobile phones on display at this location (either in hand or on charge) will be vulnerable to the opportunist phone snatch. With the new locations mostly closer to the carriageway this form of crime can be carried out by moped or bicycle. The large façade where the advertising screen is proposed will act as an opportunity for concealment and increase the risk of theft and assault. The close proximity to the carriageway will mean that the advertising screens will be in full view of vehicles driving past. This will be a distraction and could lead to an increase in reported collisions along these stretches of road. During hours of darkness the illuminated screens will offer increased distractions as these adverts pop out. The other consideration should be safety of the user as well as other road users. Due to the close proximity to the carriageway and the lack of visual permeability through the kiosk persons could step into the road with little to no warning for a road user. The potential for road traffic collisions increases.

**O/S 19 – 21 Tottenham Court Road (Planning reference 2021/3910/P)**

This proposed kiosk is located outside a Sainsbury's store and there is currently a public bench that will look directly over the hub. The risk of antisocial behaviour increases at this location due to the possible street drinking in this area. I have concerns for this site. This area already suffers with antisocial behaviour and street crime and it is felt that the benches in such close proximity to the kiosk could increase the likelihood of opportunistic theft at this location. A potential thief could sit and wait on the bench where he would not stand out waiting for the opportunity. The removal of the two (2) existing phone kiosks at this location is a good thing as it will open up sight lines. The new kiosk still has a large screen which can be used as a concealment opportunity. I am also concerned regarding the noise cancelling facility through the headphone port? This could mean that users of the hub might not hear persons approaching. This is a concern for safety. The other consideration should be safety of the user as well as other road users. Due to the close proximity to the carriageway and the lack of visual permeability through the kiosk persons could step into the road with little to no warning for a road user. The potential for road traffic collisions increases. Having the advertising screens in such close proximity to the carriageway could be a distraction for road users leading to an increase in reported collisions in the vicinity of these proposed inlink kiosks. The screens at night could cause drivers unnecessary glare. It is recommended that the advertising screen be switched off overnight.

**O/S 30 Tottenham Court Road (Planning reference 2021/3911/P)**

**O/S 39 Tottenham Court Road (Planning reference 2021/3912/P)**

Both of the applications above (O/S 30 and 39) are in close proximity to each other. There is currently a public bench that will look directly over the hub. The risk of antisocial behaviour increases at this location due to the possible street drinking in this area. I have concerns for this site. This area already suffers with antisocial behaviour and street crime and it is felt that the benches in such close proximity to the kiosk could increase the likelihood of opportunistic theft at this location. A potential thief could sit and wait on the bench where he would not stand out waiting for the opportunity. The removal of the two (2) existing phone kiosks at this location is a good thing as it will open up sight lines. The new kiosk still has a large screen which can be used as a concealment opportunity. I am also concerned regarding the noise cancelling facility through the headphone port? This could mean that users of the hub might not hear persons approaching. This is a concern for safety. The other consideration should be safety of the user as well as other road users. Due to the close proximity to the carriageway and the lack of visual permeability through the kiosk persons could step into the road with little to no warning for a road user. The potential for road traffic collisions increases. Having the advertising screens in such close proximity to the carriageway could be a distraction for road users leading to an increase in reported collisions in the vicinity of these proposed inlink kiosks. The screens at night could cause drivers unnecessary glare. It is recommended that the advertising screen be switched off overnight.

**O/S 220 – 224 Tottenham Court Road (Planning reference 2021/3913/P)**

This proposal appears to be outside a vacant shop frontage. I know that Tottenham Court Road is a busy street but be that as it may there will be a drop in natural surveillance at this location unless another retail opportunity takes up residence. This area already suffers with antisocial behaviour and street crime and it is felt that the lack of immediate surveillance to the kiosk could increase the likelihood of opportunistic theft at this location. The removal of the two (2) existing phone kiosks at this location is a good thing as it will open up sight lines. The new kiosk still has a large screen which can be used as a concealment opportunity. I am also concerned regarding the noise cancelling facility through the headphone port? This could mean that users of the hub might not hear persons approaching. This is a concern for safety. The other consideration should be safety of the user as well as other road users. Due to the close proximity to the carriageway and the lack of visual permeability through the kiosk persons could step into the road with little to no warning for a road user. The potential for road traffic collisions increases. Having the advertising screens in such close proximity to the carriageway could be a distraction for road users leading to an increase in reported collisions in the vicinity of these proposed inlink kiosks. The screens at night could cause drivers unnecessary glare. It is recommended that the advertising screen be switched off overnight.

I believe the noise cancelling aspect of this device needs to be investigated further. The amount of usage that these devices (prior to upgrade) should also be highlighted within the application. As stated previously the issues of antisocial behaviour and street crime along this road are well established and the introduction of these devices will not reduce this. The proposal also has several of these devices in close proximity. This means that also old kiosks which take up a slightly larger footprint are being removed there is still going to be places for persons to conceal themselves.

If these applications are granted I recommend the following:

- Strict compliance with Communication Hub Unit Management Plan (version 2).
- Integrated CCTV camera (operational from Day 1 of official unit 'switch-on').
- Small area of tactile paving (advertising side and to each side of device).
- Ongoing review into ASB and crime in the locality to be every three (3) months and if problems arise for them to be addressed in a timely manner.

From previous applications and work with some of my colleagues it is very reassuring that InFocus will continue to work with both the LPA and the MPS in respect of any issues that are highlighted and can be influenced by changes either to the ASB management plan or to the device. Issues such as misuse of the USB charging point (eg. portable speakers plugged in by buskers to 'blare out' music etc), misuse of the charging induction point and so on can be 'designed out' through dialogue with InFocus and their remediation by either temporarily disabling or removing these functions, reducing charge times, temporarily disabling/removing WIFI and so on.

It is also very positive that these proposed devices can be used to 'advertise' crime prevention charities such as CrimeStoppers, warnings regarding local crime trends such as pick-pockets operating in the area, local authority and support agencies details and so on. In the current climate, notices displayed on their screens such as public health information and advice would also appear to be beneficial to the local community.



**Section 17 of the Crime and Disorder Act 1988:**

*"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 its area", as clarified by PINS953.*

**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."*

**Barnet Core Strategy - Barnet Development Plan Document - September 2012**

*10.5.8 The publication of Safer Places in 2004 combined urban design theory and practice with crime prevention to identify seven attributes of making places safer. These are access and movement; structure; surveillance; ownership; physical protection; activity and management and maintenance.*

*10.5.9 We also support the principles of the Police flagship initiative Secured by Design, which work mutually with and support those principles identified above from By Design. This focuses on crime prevention at the design, layout and construction stages of development by seeking to 'design out crime' and recognises the links to creating a mixed and balanced community as further outlined under the section on making Barnet a safer place. We will use Safer Places and Secured by Design as part of our designing out crime solutions.*

Kind Regards,