



Jonathan McClue
London Borough of Camden
2nd Floor,
5 Pancras Square

Design Out Crime Office
North West DOCO Office,
Ruislip Police Station,
The Oaks,
Ruislip,
HA4 7LE
Telephone: 0208 7333703
DOCOMailbox.NW@met.police.uk
Your ref: 2021/3225/P
Our ref: NW
22nd February 2022

Dear Jonathan,

Murphy's Yard - Planning reference 2021/3225/P

Thank you for allowing me to comment on the proposed development of Murphy's Yard, namely land to the south of Gordon House Road bounded by railway lines to the east, west and south and accessed from Gordon House Road, Sanderson Close and Greenwood Place London NW5.

Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising 18 development plots (for the purposes of consultation: including buildings with a maximum height of 113.45m AOD) for the following mix of uses: [750-825] residential units (Use Class C3), [up to 8,000sqm GEA] residential institution floorspace (Use Class C2), [a minimum of 40,461sqm GEA] industrial floorspace within Use Classes E(g)(iii), B2 and B8 and [up to 8,150sqm] general industrial and/or storage floorspace [Use Class B2 and/or B8], commercial floorspace (Class E) including [up to 36,043sqm GEA] light industrial floorspace (Class E(g)(iii)), [up to 34,500sqm GEA] office floorspace, [up to 36,000sqm GEA] research and development floorspace (Class E(g)(ii)), and [up to 16,000sqm] healthcare floorspace (Class E(e)), [1,300-3,650sqm GEA] flexible commercial and sui generis floorspace (Use Class E and/or Sui Generis Use), [300-1,300sqm GEA] community floorspace (F1 and/or F2), [up to 1,500sqm] flexible mixed-use space (Class Sui Generis), and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements including new pedestrian and cycle routes, and all associated works [for the purposes of consultation].

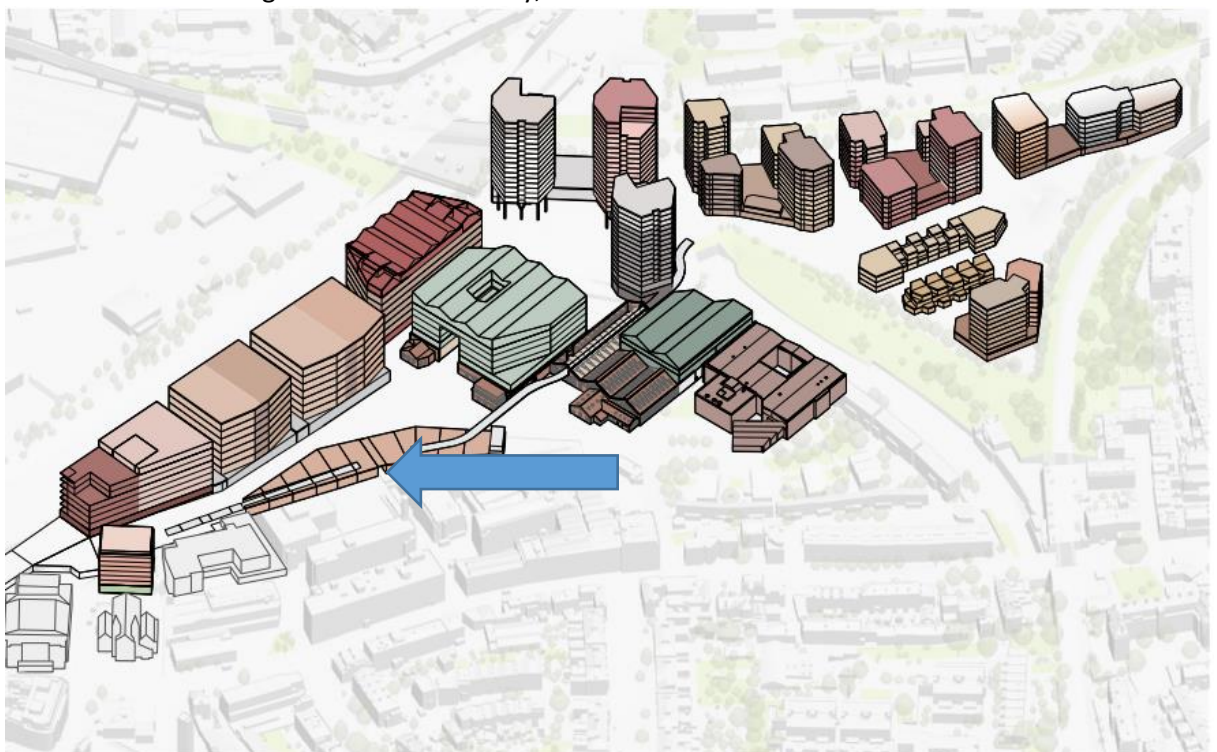
This proposal is large in scale and covers the policing wards of both Highgate and Kentish Town. The top recorded crimes for the month of December 2021 (taken from the police UK website) are anti-social behaviour, violence/sexual offences, vehicle crime and public order. I have included crime statistic illustrations for both wards contained within appendix 1 as well as relevant planning policy within appendix 2.

I object to the proposal for the following reasons.

The Design Out Crime team has had numerous meetings with the architects for this proposal and discussed aspects of the design. The CTAs were also within many of the meetings. The architects were very good at engaging early on and kindly hosted a site visit with Murphy's where further questions were answered on the current design and future proposals for the development. Concerns were raised from both a CT aspect and the crime and disorder perspective. It would appear that within the design and access statement (p.156) only the concerns from the CTA have been noted.

1. Block C - reserved for social housing - is in a poor location. It is disjointed and remote from the other areas set aside for residential units at the north of the site. There is potential for conflict of use between the residential and the proposed light industrial units which are located a short distance away. Of utmost concern, this block is also in very close proximity to the O2 Forum which is a popular late night entertainment venue. The noise generated from this venue and the revellers entering and leaving (via the Heath line through the new development) will cause issues for the residents of Block C. The provision of seating nearby could mean that the queues for the venue may tail into the footprint of this residential development at night. Street drinking and possible drug taking will take place as a consequence. Other issues such as public urination will also become a factor. The area is set back from the main road and owing to this, natural surveillance will be very limited. This will be especially prevalent when the light industrial units are closed after business hours and at certain points over weekends. The church opposite the residential block could also provide issues for residents with possible parking issues during times of worship. The positioning of Block C in close proximity to an active nightclub is an obvious case of potential conflict arising from poor layout of a new development in relation to existing users, and this is wholly unacceptable owing to the crime and disorder issues it will generate.
2. Permeability and in particular access to the Heath line pedestrian and cycle route need to be considered. The site is permeable with several footpaths proposed and with future plans to open this area up further. This development is set back from the main (active) roads. It therefore will have less natural surveillance being sited away from major transport routes. General police patrols will not sufficiently have access to this area and will be concentrated on the main roads around Kentish town. The area could become attractive for groups to linger. During the day this might not be so much of an issue but after business hours, groups could take over these communal public spaces. This can lead to an increased risk of anti-social behaviour occurring and crime levels increasing. This in turn will increase the fear of crime making the area less attractive for businesses to come into the area and also for people wanting to move into the development. Camden has had well publicised recent issues with moped enabled crime, so the creation of the Heath line (a shared pedestrian and cycle route) will be exploited by criminals as route to access, locate potential victims and escape through. The area will be used as an escape route for criminals wishing to evade police patrols.
3. The proposed children's playground is located on an elevated section of the Heath line south of the sheds before declining to ground level at the south of the site. This is some distance away for the bulk of the residential units to the north and south of the development. In general, parents will not be able to watch their child from their house or flat. There is not enough surveillance over this location and it is open 24/7. It is believed that this area will be taken over. Drug dealing could take hold in this area as although there is no real surveillance over this area it does occupy an elevated position which would give drug dealers/users an early alarm system for any approaching threats. The benches, equipment and surrounding landscaping could provide concealment opportunities for drug or weapon stashes. The play area is also overlooked by a public car park located just off the site. This could add risk to the children using this facility as the users of the car park cannot be easily monitored. The children could be at risk of having photographs or videos taken and other forms of sexual exploitation.

4. Owing to the design it would appear that some of the buildings on the development will remain open 24/7. One case in particular will see the Heath Line walkway during its elevated section go through an existing shed building. If buildings are left insecure and offer shelter they will become problem areas. Groups will congregate in these areas and anti-social behaviour and crime will occur. Even if there is a dedicated private security team overnight there will be issues. The businesses will be closed and active frontages and pedestrian footfall will drop. The site is set back from the main roads leaving police patrols to a minimum. Police resources will be called upon to assist in this problem area where police numbers are already stretched.
5. Undercrofts around the Heath line and Heath cliff. This is another major concern and goes hand in hand with some buildings allowing unlimited access at all times of day and night. There are large undercrofts below the residential units/blocks located at the top of the Heath Line where there is a series of steps/winding path down towards the main shed buildings. These recessed areas out of the elements will be another location where people will congregate. These will be in and around the residential entrances to the blocks. Will residents feel safe having to walk through a potentially large group of people loitering in this space to reach their home? It is strongly believed that street drinking and drug taking will take place in these locations. The sloped steps and weaving path along this area of the Heath Line is planned to have numerous seating opportunities. It is a concern that this area will again attract anti-social behaviour and street drinking. The geography of this area might also mean that a natural amphitheatre is created meaning any noises generated could be carried far into the development. This could lead to an increase in noise complaints from the local residents.
Another area of concern appears in the form of a walkway/subway area located almost under the proposed elevated children's playground. It adds another layer of uncontrolled permeability into the site. It would appear from the drawings contained within the design and access statement that it will be poorly observed and have no surveillance. This area will become an area owing to the risk of robbery, assault or sexual offences.



The above illustration taken from p.273 of the design and access statement indicates the location of this subway

6. There is a further ground level route for pedestrians in the central area. This route leads between the large shed and the proposed health centre. The shed will have a large gable end with little surveillance out into this area. It would appear that surveillance would rely upon the health centre windows; in reality these will probably have privacy screens. Coupled with the opening times for the centre this will severely inhibit surveillance of this area. This could lead to an increase in crimes such as robbery and opportunistic theft occurring. There is also proposed visitor cycle stands for this area. This is not a good idea given how inactive the frontages will be.
7. The lighting strategy appears inadequate. There are references and illustrations of bollard lighting in places such as the Heath Line and the children's play park. Bollard lighting should only be used for navigation purposes and never as the principle lighting provider; a scheme based only on this system cannot meet BS 5489-1 2020 (the standard for public lighting) and fails to illuminate faces. In an area that is away from the main routes and police patrols, poor lighting will increase not just the opportunity for but also the fear of crime in this development.
8. Proposed cycle stand locations should be reconsidered; in certain areas they are often tucked into areas where there will be little footfall or activity and consequently will have lower levels of surveillance.
9. As this development is largely car free, there is little provision for any residents to have vehicles other than those with restricted mobility. This could have an impact on the surrounding roads where there could be areas of conflict between the residents of this development (who will still own cars but have nowhere to park them on the new development) and existing residents around the area. There is potential for great displacement of vehicles from this site to existing residential roads nearby. Vehicle crime was already mentioned as major crime for Highgate and Kentish Town wards.

These are just the main areas of concern which are the basis of this objection.

Mention was made within the proposal to increase the number of paths into the site through future applications, in particular into Regis Road industrial estate and to open a secluded path towards Kentish Town station in the south east. **This would also be opposed from a police standpoint, as it is just this type of route that becomes a potential location for crime and anti-social behaviour.** If this development receives planning permission, I request the following conditions be placed upon this development.

1. Prior to construction proof that the plans can achieve Secured by Design accreditation must be submitted to the Met Police Design Out Crime Officer and local planning office.
2. Prior to occupancy Secured by Design accreditation must be achieved for each phase (both residential and commercial) and maintained in accordance with the award for the lifespan of the development.

Further consultation will be required in pursuit of achieving SBD certification for the development. If you or the applicant wishes to discuss any of my recommendations further then please feel free to contact me. Further advice can be found in the following guide:

https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf

The advice has been adjusted taking into consideration crime statistics and analysis of the area.

I would ask that my interest in this planning application be noted and that I am kept apprised of developments.

Kind Regards,

PC Aran Johnston

Designing Out Crime Officer

Metropolitan Police Service

Telephone: 0208 7333703 **E-mail:** Aran.L.Johnston@met.pnn.police.uk

Office Email: DOCOMailbox.NW@met.police.uk

Address: North West DOCO Office, Ruislip Police Station, The Oaks, Ruislip, HA4 7LE

The primary objective of an efficient Police Service is the prevention of crime

Crime Prevention advice can be found on the Metropolitan Police Service Website –

<http://content.met.police.uk/site/crimeprevention>

Appendix 1

Kentish Town crime figures

Top reported crimes	
Most commonly reported crimes during Dec 2021	
Violence and sexual offences	46
Anti-social behaviour	36
Public order	17
Vehicle crime	16

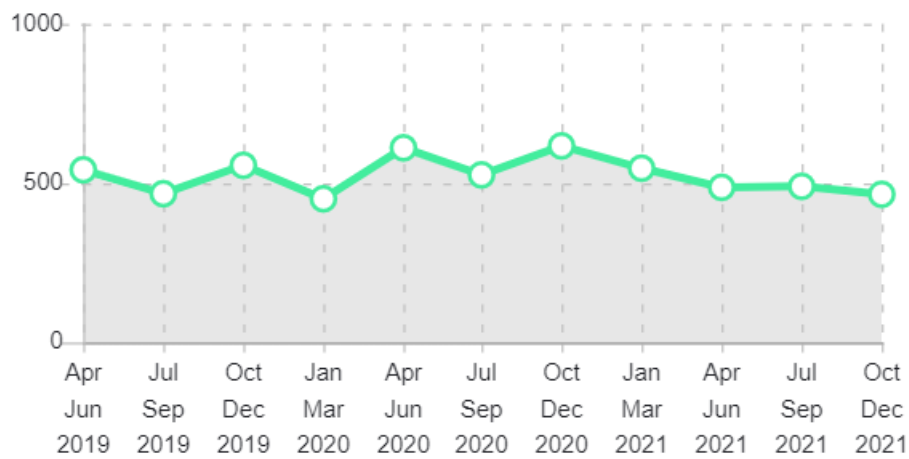
Crime levels overview

for the last 3 years (from Apr 2019 to Dec 2021)

Last 12 months

Last 3 years

Crime per Quarter



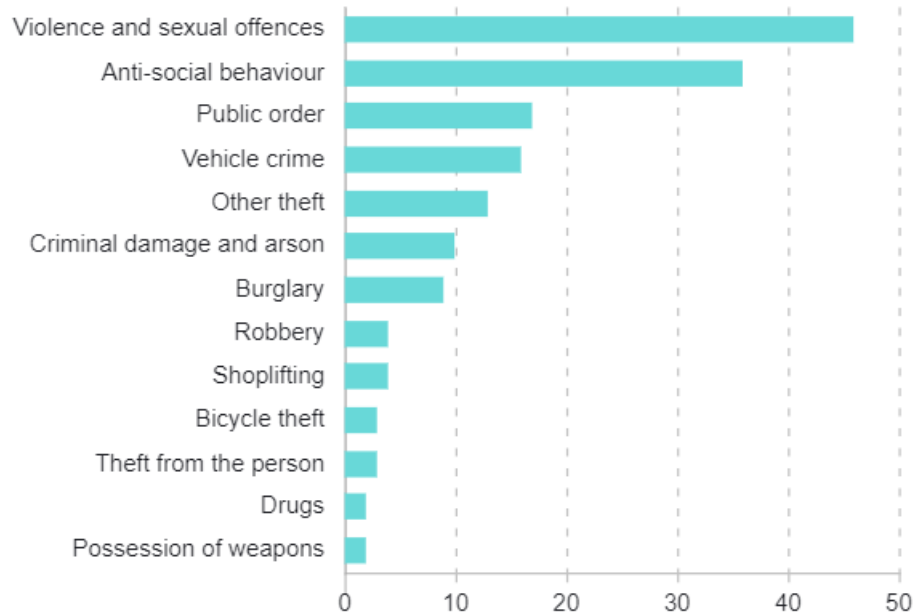
Crime types description

for the latest month (Dec 2021)

Latest month

Last 12 months

Last 3 years



Highgate Crime figures

Top reported crimes

Most commonly reported crimes during Dec 2021

Anti-social behaviour	25
Violence and sexual offences	25
Vehicle crime	14
Public order	10

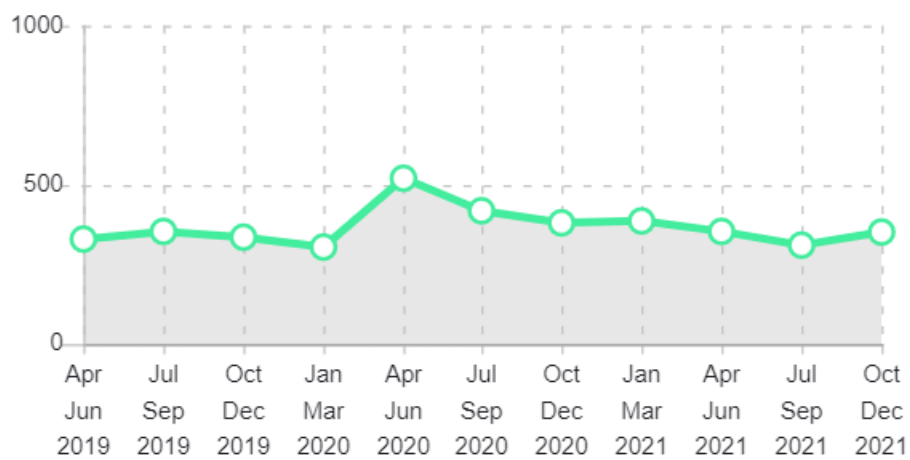
Crime levels overview

for the last 3 years (from Apr 2019 to Dec 2021)

Last 12 months

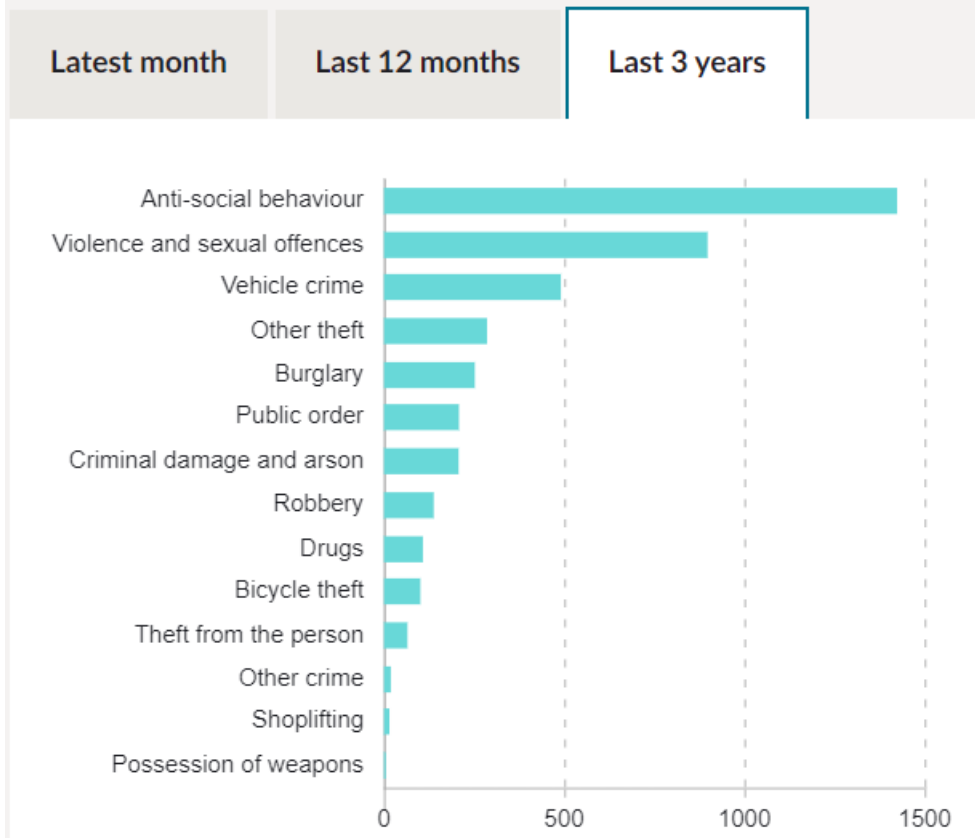
Last 3 years

Crime per Quarter



Crime types description

for the last 3 years (from Feb 2019 to Dec 2021)



As is evident from the crime figures going back three (3) years, lockdown restrictions seem to have had little effect. Other areas of London have seen crime rates fall over this same period.

Appendix 2

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 NPPF and Camden’s own local guidance indicate that crime and disorder are key considerations within the planning process:

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 ensure that developments..

f) 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

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.”

(Crime figures obtained from www.police.uk and are as most recent as available)

‘Crime prevention advice is given freely without the intention of creating a contract. Neither does the Metropolitan Police Service take any legal responsibility for the advice given. You must abide by the fire and safety regulations and if you are in any doubt consult the Fire Prevention Officer and the Council’s Building Control Officers.’