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Your ref: 2022/0528/P  
Our ref: 2022/0528/P

Dear Mr Fowler,

Thank you for allowing me to comment on the **Detailed planning permission for Development Plots N3-E, N4, and N5 including demolition of existing above ground structures and associated works, and for residential development (Class C3) and commercial, business and service (Class E) uses in Development Plot N3-E, residential development (Class C3) and local community (Class F2) and commercial, business and service (Class E) uses in Development Plot N4, and residential development (Use Class C3) and commercial, business and service uses (Class E ) uses in Development Plot N5 together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots. Outline planning permission for Development Plots N1, N2, N3, N6, N7 ,S1 and S8 including the demolition of all existing structures and redevelopment to include residential development (Class C3) commercial, business and service uses (Class E), sui generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots. The proposed address for this development is the **O2 Masterplan Site Finchley Road London NW3 6LU.****

This site falls within the London borough of Camden and the policing ward of West Hampstead. The top reported crimes for the month of January 2022 (taken from the police UK website) are violence and sexual offences, antisocial behaviour, burglary and other theft.

Please refer to Appendix A for illustration of crime figures and local as well as national planning policy

I have had a meeting with the applicants back in May of last year but this is the only interaction. I have supplied a scoping comment for this proposal and many of my concerns are still present.

I cannot support this application in its current form but have the following comments and observations to make:

- There are several concerns for this proposed application. Access onto the site is of note. The current main access route is A41 Finchley Road, with secondary access via B150 from Blackburn Road. There is also pedestrian access from B150 via Billy Fury Way. Permeability in the form of footpaths needs to be considered carefully as 'leaky' developments (with secluded footpaths) can be a breeding ground for anti-social behaviour and crime. A multi-use common access route is preferred where there is vehicular movement, pedestrian traffic and cycle lanes. This enables a good level of vehicle use and footfall boosting the natural surveillance along key routes into the site. There should be no separate footpaths as these are often poorly overlooked and can be flash points for street crime including robbery type offences as well as sexual assault and other violent crime. Billy Fury Way and Granny Drippings steps are of particular concern providing access into the estate practically unseen due to the lack of surveillance at these locations. They will become vulnerable areas with higher rates of crime and antisocial behaviour. I do not feel enough is being done to address these vulnerable areas. These routes were mentioned within page 44 of the design and access statement "***Low quality connections the north south pedestrian connection via Billy Fury Way and Granny Dripping Steps is unsafe, and the route from the site to West Hampstead Station is uninviting and poorly maintained.***"
- If light industrial mixed use will occupy ground floor space with residential units above this should be considered carefully, as after a certain time (1700/1800 hours) there will be much reduced legitimate activity around these ground floor areas. This will reduce the footfall and natural surveillance and produce an environment where groups could gather, the result of which could be an increase in ASB. With groups loitering and associated rowdy behaviour, this will increase the fear of crime for the residents - some of whom may be reluctant to venture out after a certain time.
- For blocks of residential units access control and compartmentalisation will be key to mitigating the risk of anti-social behaviour and acquisitive/opportunistic crime. Drugs are also a key issue for the borough of Camden and the development must not become a kindly habitat for gangs to enter and take control. Compartmentation is possible on this site but from the earlier meeting it was something that the client was initially against.
- There is already a large night time economy for the borough of Camden and this could overflow into the new development. This along with a proposed licensed premises on the initial plans viewed at an earlier meeting with the architects could have a detrimental effect for the businesses and residents on the site.
- Permeability will be a key factor as there is already a burglary and opportunistic theft trend for the area. Landscaping will also be important. Lines of sight, lack of concealment opportunities, reduced opportunities for group seating/gathering.
- The development may wish to be car free; such proposals may be difficult to manage in reality, as residents and workers may resort to parking in nearby roads thereby increasing traffic pressure in the surrounding area. Should the development seek to include car parking, careful consideration will be needed about appropriate parking areas. Open under crofts and insecure underground car parks can become plagued with crime and ASB, especially in areas with an active drug scene.
- The detailed submitted plans for the commercial and residential blocks appear to have areas of crossover where residents and business owners/workers could come into potential conflict. The division between public realm and private residence is blurred in some areas and this again could lead to potential conflict. I am thinking in particular the podium steps area in Linear Park backing onto the residential development.
- The other issue is that this proposal is only in part detailed. Due to the size and potential impact on the community this design needs to be right and benefit both residents and local businesses alike. A short distance away from this proposal was the transformation of a listed building to a school. Would it not be better that a purpose built school occupy a plot on the

new site instead of trying to make one fit in a pre-existing building which was not meant to function as a school?

Similar developments within Camden:

Referenced on p19 and p20 of the report are numerous developments with applications similar to this, such as the 156 West End Lane, Abbey Road, The Avenue and Liddell Road. All have benefited from the advice of Met Police design out crime officers. The proposed site should be no different and should be conditioned to achieve SBD certification.

**I therefore propose that crime and disorder are material considerations for this site. Concerns can be allayed by the council agreeing to a condition for the development to achieve Secured by Design certification for all phases prior to occupation including residential, commercial and educational areas, to be maintained in line with SBD certification thereafter. This will require ongoing engagement at an early stage of each phase between the designing out crime officer and the development team.**

I strongly recommend that 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 design out crime officer and local planning office.
2. Prior to occupancy a secured by design accreditation must be achieved and maintained for the lifespan of the development.

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/HOMES\\_BROCHURE\\_2019\\_update\\_May.pdf](https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf)

[https://www.securedbydesign.com/images/downloads/SBD\\_Commercial\\_2015\\_V2.pdf](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

## Appendix A

Camden planning response template – NPPF and Camden local plan references

### **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 it’s area”, as clarified by PINS953.

The NPPF and Camden’s own local guidance can support this proposal:

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](http://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

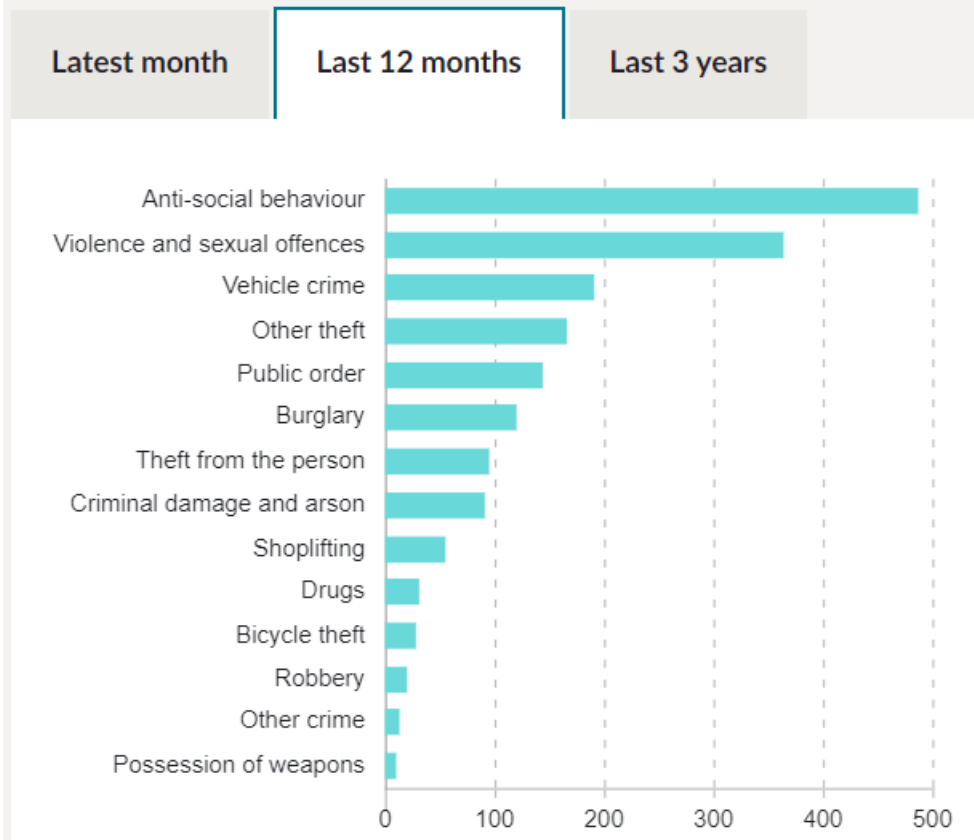
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”



Line graph showing the number of crimes over the last twelve months for West Hampstead ward.

## Crime types description

for the last 12 months (from Feb 2021 to Jan 2022)



*Bar chart indicating the types of recorded crimes over the last twelve months on West Hampstead*

Anti-social behaviour	488	26.7%
Bicycle theft	29	1.6%
Burglary	121	6.6%
Criminal damage and arson	92	5%
Drugs	32	1.7%
Other theft	167	9.1%
Possession of weapons	11	0.6%
Public order	145	7.9%
Robbery	21	1.1%
Shoplifting	56	3.1%
Theft from the person	96	5.2%
Vehicle crime	192	10.5%
Violence and sexual offences	365	20%

*Number of crimes on West Hampstead over the last twelve (12) months*

**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>

(Crime figures obtained from [www.police.uk](http://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.’*



