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www.met.police.uk
Your ref: **2022/0329/P**
Our ref: **2022/0329/P**
(add date --/---/----)

Good afternoon,

Thank you for allowing me to comment on the proposed ***Refurbishment of the Stables and internal alterations to provide residential accommodation, alteration of the flat roof to provide skylights and adequate insulation, installation of solar PV panels, the opening of windows previously blocked on the side elevation within the site of Hampstead Police Station 26 Rosslyn Hill London NW3 1PD planning reference 2022/0329/P.***

This proposal is within the London borough of Camden in the policing ward of Hampstead Town. The top recorded crimes for the Month of January 2022 (taken from the Police.uk website) are antisocial behaviour, other theft, violence and sexual offences and theft from person.

Please refer to the appendix for illustrations of crime figures and an overview of relevant local and national planning policy.

Hampstead police station has been closed since 2013. Access onto the site and the stables is through the police vehicle gate on Downshire Hill. The former stables occupy a plot to the left of the driveway behind two residential houses on Downshire Hill.

I have had no previous meetings with the architect or applicant in regards to this proposal. I have read and acknowledge the concerns of the local residents with respect to privacy issues. Where I look at crime reduction it must be noted that issues such as privacy can be causes for contention and areas of potential conflict.

I do not object to the proposal but I have the following concerns and recommendations to make.

- The plot is set back and out of view from the road. This concerns me in that the police station is currently not in use and this could be the case for some time. Apart from the occupier there will be very low natural surveillance, legitimate activity in that location.
- Who will have access to this driveway leading to the development? With the police station not in use it could become appealing as a concealment opportunity where antisocial behaviour, drugs and other forms of crime could take hold. The road is currently gated but what are the procedures for keeping this area secure? This could impact the re-development of the former police station.
- The privacy issues have already been mentioned. It is a careful balance between having that surveillance and sense of security from neighbours to feeling as if your privacy is being impacted upon.

It is strongly recommended that this location have security rated products to mitigate against the risk of burglary. As stated the fact that this plot is out of view from the main road and suffers with a lack of natural surveillance will make it vulnerable to crime. PAS24:2016 windows, skylights and doors are recommended for ground level and for anything below three and a half (3.5) metres. I would also recommend dawn to dusk lighting via LED.

Other considerations

- 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 could/would be recording public areas. Appropriate signage indicating this fact needs to be displayed.
- With the lack of activity and natural surveillance it is strongly recommended that an intruder alarm be installed. Intruder alarms need to be compliant with PD 6662 scheme for the application of European standards for intruder and hold up alarms. Installers need to be members of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB) and fitted to BS 50131.
- If the (currently gated) drive way is to be opened then lighting will be important. Lighting must be at levels recommended by BS 5489-1:2020.
- The proposed cycle store provision needs to be considered carefully. A bike locker security rated to LPS 1175 SR1 (or above) is recommended or sold secure diamond rated. If this cannot be achieved then the store should be in a location that cannot be observed from the public realm. If this is a rear garden or the like then I recommend a stand similar to Sheffield or London in style which is set into the ground to ensure no bolts/fixings are exposed. The stand should allow for three (3) points of locking. Cycle theft has increased over lockdown through the UK and not just in London.
- Control access for the currently gated driveway if possible to ensure that it is the lawful occupier that has access only. This can be achieved through a gate with encrypted key fob access or similar. It is understood that this may not be achievable dependant on rights of access etc. The height of this gate. Boundary should be a minimum of 1.8 metres dependant on local planning policy it could be higher (recommended).

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.

If this is a refurbishment and not a new build then the highest award that can be granted through secured by design is a bronze award.

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

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) 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.”

Top reported crimes

Most commonly reported crimes during Jan 2022

Anti-social behaviour	16
Other theft	13
Violence and sexual offences	12
Theft from the person	8

Top reported crimes for January 2022 (taken from Police UK website)

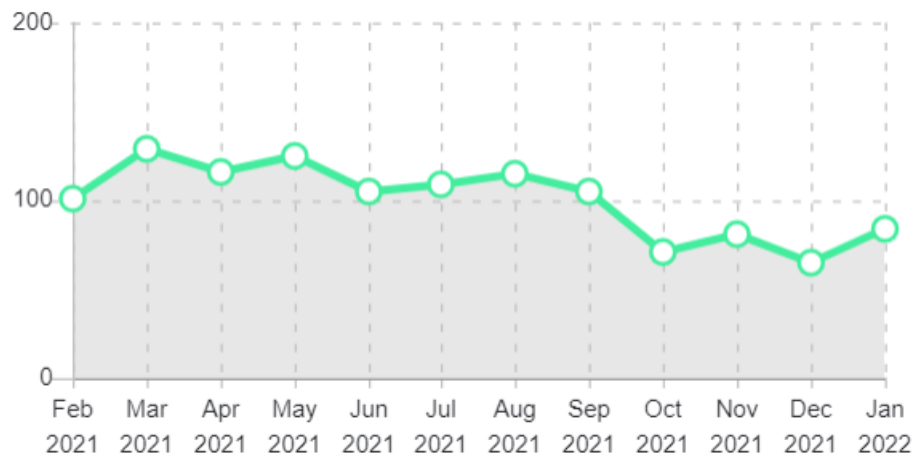
Crime levels overview

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

Last 12 months

Last 3 years

Crime per Month



Crime levels over the past twelve (12) months (taken from Police UK website). From this illustration it can be seen that reported crimes within the ward are on the increase.

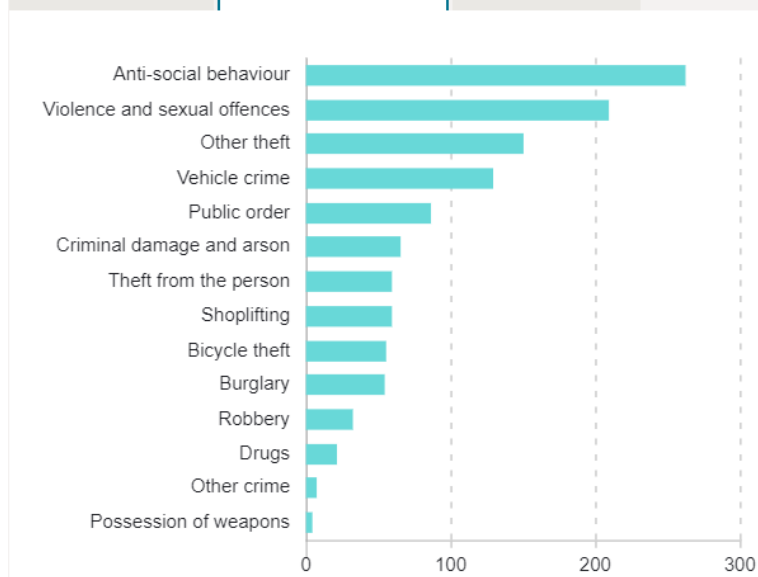
Crime types description

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

Latest month

Last 12 months

Last 3 years



Crimes by description over the past twelve (12) months (taken from the Police UK website)

Type	Total	Percentage
Anti-social behaviour	263	21.8%
Bicycle theft	56	4.6%
Burglary	55	4.6%
Criminal damage and arson	66	5.5%
Drugs	22	1.8%
Other theft	151	12.5%
Possession of weapons	5	0.4%
Public order	87	7.2%
Robbery	33	2.7%
Theft from the person	60	5%
Vehicle crime	130	10.8%
Violence and sexual offences	210	17.4%

Volume of crimes on the ward over the last twelve (12) months (taken from the Police UK website)

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 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.’