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Your ref: 2021/3681/P
Our ref: 2021/3681/P

Good afternoon,

Thank you for allowing me to comment on the **Change of use from restaurant/bar (formerly A3/A4/Sui Generis) to a live music and cultural venue with cafe, restaurant, drinking establishment and related activities and events (Sui Generis) at 6 ST Chads Place, London WC1X 9HH.**

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

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

I have had no previous meetings with the architect or applicant in regards to this proposal.

I do not object to the proposal but feel that further points need to be considered.

The location of the venue is not well overlooked and the area has much less footfall than some of the busier surrounding roads. I took the time to visit the street and proposed location where I found that egress for the music venue (especially the path that leads out to Kings Cross Road) to be very poor. There were concealment opportunities with broken sight lines. The lack of surveillance in the area is highlighted by the amount of graffiti. Human defecation was also noted in some of the doorways around this area. There was some column lighting but is there anything more to be done to protect violence against woman and girls (VAWG) which is an important and relevant topic. This crosses over with the risk of child sexual exploitation at licensed venues. A good feature of this establishment is the lack of doors providing entry. Underage visitors are less likely to be able to enter the café/bar.

The bridge overlooking the tube line has extended fencing from the hotel side but nothing from the proposed music venue. I would recommend that the height of the bridge boundary be extended in line with that of the hotel. This would mitigate against intentional items being thrown/discarded onto the track or missiles thrown with purpose. This would also mitigate against the risk of persons climbing over and causing injury to themselves or others.

Having legitimate activity during the day will be of benefit to the area. It is whether this continues into the evening and later at night.

In regards to the design I have the following comments and recommendation to make:

- The front doors are recommended to be PAS24:2016 security rated. They should be single leaf and glazing should be enhanced to BS EN 356: 2000 category P4a or above. Consider an external retractable shutter for these doors also rated to either LPS 1175 SR2 or STS 202 BR 2.
- Glazing for the windows at ground level to be enhanced to BS EN 356: 2000 category P4a or above.
- All entrances into the building and venue need to be considered and how they will be used and ultimately misused when the venue is operating. CCTV will be required throughout. 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.
- Consider an intruder alarm for this building due to the vulnerability and lack of natural surveillance in this area. 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.
- I would also recommend a security rated door for the stock room and any location where cash may be stored. The door should be either PAS24:2016, LPS1175 SR2 or STS 202 BR2.
- Any back of house areas that are accessible from the public realm again need to be security rated to PAS24:2016. Consider an external retractable shutter rated to either LPS 1175 SR2 or STS 202 BR2.
- Will the emergency exit be used at all times and will this door be staffed? If it is only to be used in an emergency I recommend alarming the door and for CCTV to cover this area. Fire exits if not alarmed have been used to bring in underage persons into licenced premises and has resulted in child sexual exploitation in worse cases. By either alarming the door or having a physical security person at this point this risk will greatly diminish.

It is strongly recommended that this location have security rated products to mitigate against the risk of theft and damage owing to the lack of surveillance in the area. Also due to the higher rates of crime in this area (owed in part to the large transport hub on the doorstep).

I am happy to make recommendations for this development through further consultation with the applicant.

I strongly recommend that the following conditions be placed upon this application.

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.

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 Mar 2022

Anti-social behaviour	222
Violence and sexual offences	55
Other theft	25
Theft from the person	23

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

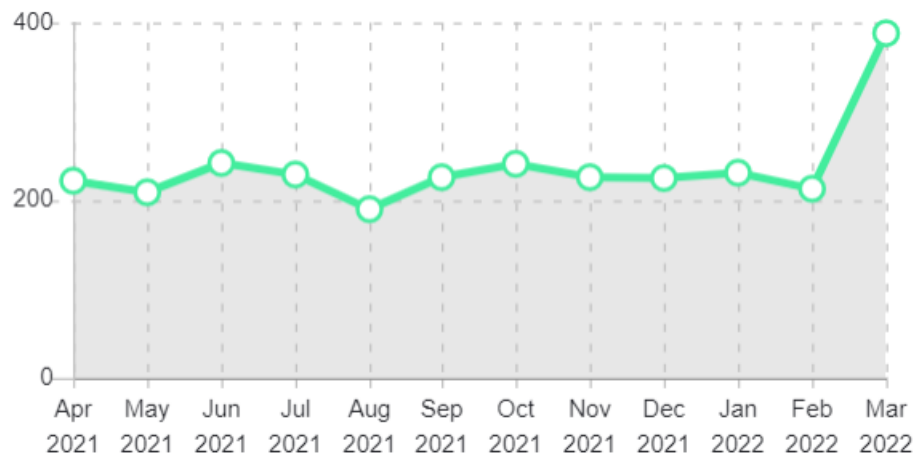
Crime levels overview

for the last 12 months (from Apr 2021 to Mar 2022)

Last 12 months

Last 3 years

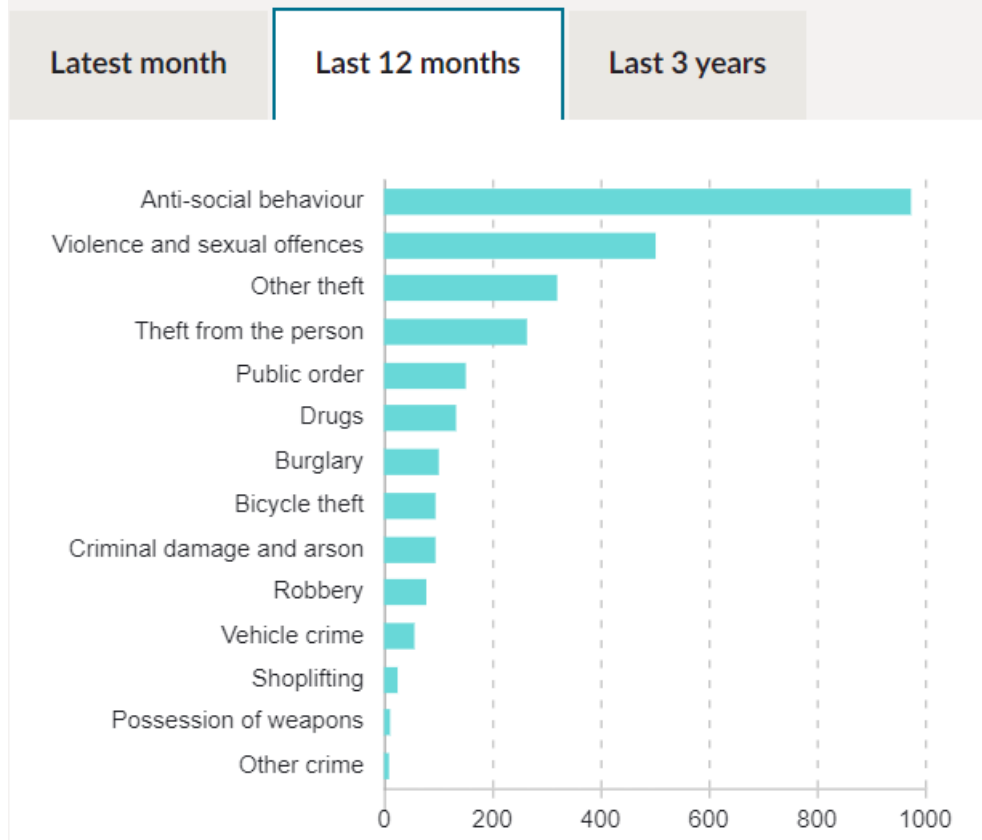
Crime per Month



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 Apr 2021 to Mar 2022)



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

Type	Total	Percentage
Anti-social behaviour	976	34.3%
Bicycle theft	97	3.4%
Burglary	103	3.6%
Criminal damage and arson	97	3.4%
Drugs	135	4.8%
Other theft	322	11.3%
Possession of weapons	13	0.5%
Public order	153	5.4%
Robbery	80	2.8%
Shoplifting	27	1%
Theft from the person	266	9.4%
Vehicle crime	58	2%
Violence and sexual offences	504	17.7%

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.’

