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Your ref: 2022/1515/P
Our ref: 2022/1515/P

Good afternoon,

Thank you for allowing me to comment on the proposed **Variation of condition 2 (approved drawings) of planning permission 2020/3881/P granted 01/11/2021 for the 'Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor; an auditorium at basement; incorporating step free entrance to Kings Cross Underground station in place of two entrance boxes along Euston Road; together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works'; NAMELY, minor design changes to external façade treatment and Euston Road entrance; changes to cycle store entrance at ground floor and public realm; internal alterations to layout across various floors; and changes to PVs and plant layout at roof level (summary)**

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 person. There has been a marked increase in crime over the last month which appears to be back in line with pre covid-19 levels. Other offences of note are drugs, burglary and cycle theft.

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

I have had a previous meeting with the architect/applicant in regards to this proposal.

I do not object to the application but have the following comments for consideration:

It is strongly recommended that this location have security rated products to mitigate against the risk of burglary, criminal damage and other theft.

- The proposed hostile vehicle mitigation also forms a seating opportunity. During the day this area should experience decent levels of legitimate activity but will become appealing to a pre-existing large street population after business hours. Consider individual seating and the use of anti-skateboard studs to prevent the area from being misused.
- Consider modular seating (for those benches which are not part of the HVM strategy) so if an issue becomes apparent the bench can be easily removed and relocated if necessary.
- Ground level bedding avoids extra seating opportunities and increases the lines of sight across the development. There are fewer concealment opportunities.
- The front main entrance is no longer recessed which is a good feature. There are however a disproportionate number of entrances into the building. It is recommended that these be reduced in order to better control persons either working or visiting the premises.
- Having a common entrance (staircase) for the lower ground auditorium is an improvement over the previous design layout. This again will aid in the control of persons within this area.
- It was advised during my meeting with the applicant that cycle store signage should be avoided. The cycle store entrance should be security rated. I recommend LPS 1175 SR2 or STS 202 BR2. The door from street level as well as the lift of store door will need access control.
- I also recommend that the entrances to the main building be a minimum of LPS 1175 SR2 or STS 202 BR2.
- For glazing I would consider a minimum of P4A (please also refer to CTSA and also the glazing provider to ensure this level of glazing could be supported).

Other considerations

- 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.
- Lighting must be at levels recommended by BS 5489-1:2020 and compliment the CCTV system.

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/SBD_Commercial_2015_V2.pdf

The advice has been adjusted taking into consideration crime statistics and analysis of the area. I am happy to discuss my comments and recommendations further if required.

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

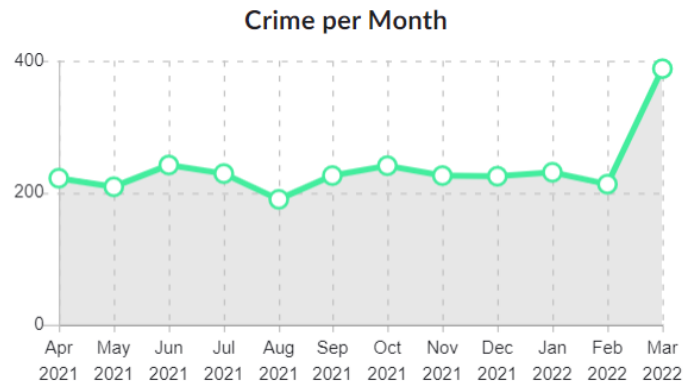
Top reported crimes for March 2022 for Kings Cross Ward (taken from Police UK website)

Crime levels overview

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

Last 12 months

Last 3 years



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

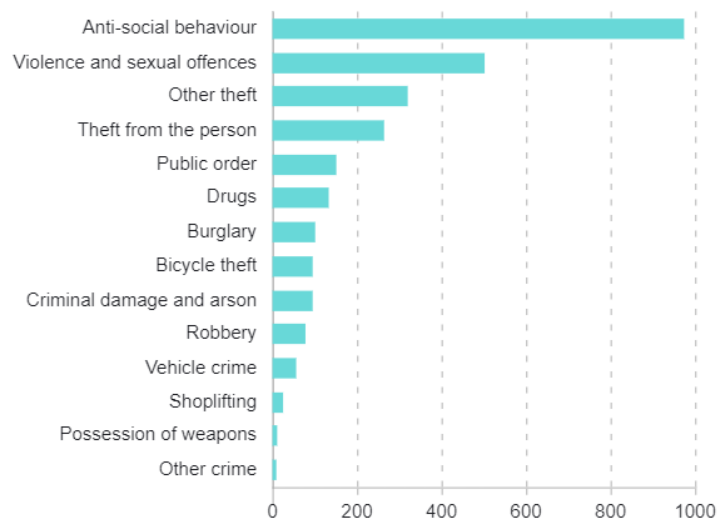
Crime types description

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

Latest month

Last 12 months

Last 3 years



Crimes by description over the past twelve (12) months for Kings Cross Ward (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 Kings Cross 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.’

