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Your ref: 2022/0084/P
Our ref: 2022/0084/P

Good afternoon,

Thank you for allowing me to comment on the proposed **Installation of 2 x new main entrance doors and glazed surround across the existing main entrance pathway and driveway at 30-53 Mornington Street, Camden, NW1 7QB.**

This proposal is within the London borough of Camden in the policing ward of Regents Park. The top recorded crimes for the Month of April 2022 (taken from the Police.uk website) are violence and sexual offences, antisocial behaviour, other theft and theft from the person. Other offences of note are burglary and drugs.

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

I have not had a previous meeting with the architect/applicant in regards to this proposal.

I do not object to the proposal but have the following comments and recommendations to make:

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

I have noted the previous comment regarding this application from the Camden Town CAAC but feel the updated design needs careful consideration. The example of the installation of gates and railings at 11-29 Mornington Street was used but in my opinion this is a flawed design and a poor example. The gates/railings at 11-29 Mornington Street are a mix of brick wall and railing. This allows for the boundary to be easily scaled by a motivated person/offender. In fact the height of this railing was increased since its first installation to mitigate against this risk. The gap in between the railings also need to be looked at. Does the gap allow for persons to put their arm through and access any of the fixtures and fittings such as the auto close feature to prevent the gate from closing? This could lead

to increased maintenance costs further down the line. There is also the issue of a fire drop key above the access control panel. I have commented on numerous estates around Camden where the fire drop key (which can be easily and cheaply purchased) has been activated. The use of the fire drop key cuts the power to the door/gate and the access control and locking mechanisms are made redundant until power has been restored by reactivating the drop key box. Drop keys have been found in possession of delivery drivers, criminal gangs and also the local street population.

I am not averse to gate and railings but I feel the below should be incorporated into the design:

- Gate and railings to meet a security rating of either LPS 1175 SR2 or STS 202 BR2.
- The boundary to be floor to ceiling to prevent the perimeter being easily scaled and the security bypassed.
- The gates should have two (2) maglocks integral to the frame positioned one third from the top and one third from the bottom of the frame. Each maglock to have a push/pull weight of 600 kgs per lock.
- A good auto close feature to prevent the door being inadvertently left open. The auto close feature should not be able to be tampered with from the public realm. A section of weld mesh could be used to protect these areas.
- Avoid the use of fire drop keys if possible. Access control boxes rated to LPS 1175 are preferred. If drop keys are required then I recommend that they be placed three (3) metres above ground level to stop them being easily reached. The London Fire Brigade will still have easy access and will be in possession of a ladder.
- Audio and video intercom so residents can suitably vet visitors prior to entry.
- Any press to exit button from the resident's side must be in a location so it cannot be activated from the public realm.

Other considerations

- Lighting must be at levels recommended by BS 5489-1:2020 and compliment the audio video intercom and any proposed or existing CCTV system.

Please consult building control and a fire officer in reference to the above recommendations

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. 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

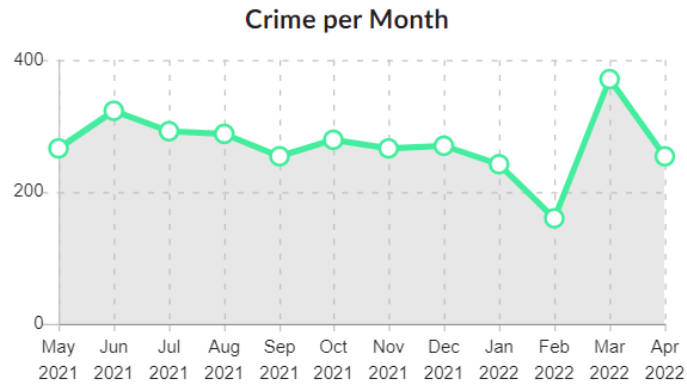
Most commonly reported crimes during Apr 2022

Violence and sexual offences	55
Anti-social behaviour	51
Other theft	46
Theft from the person	28

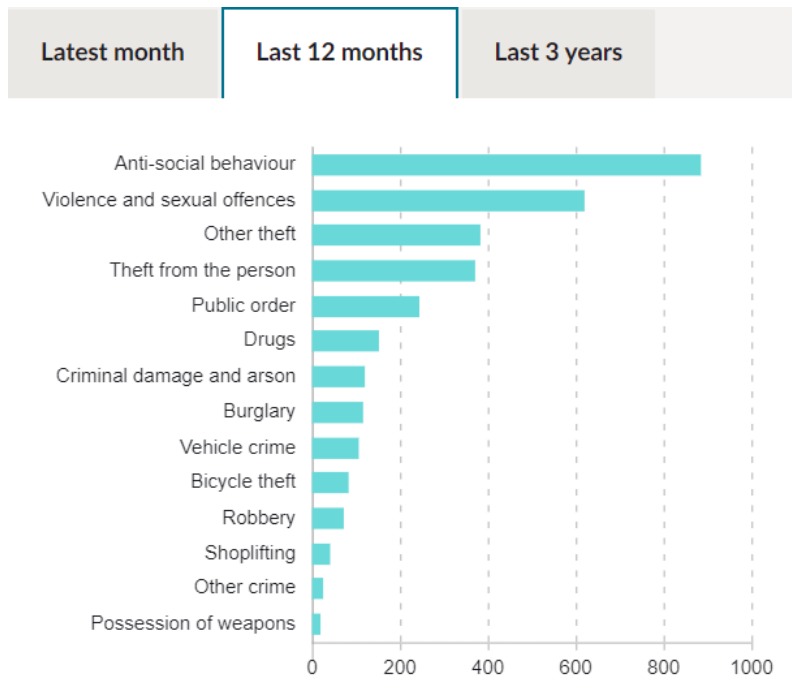
Top reported crimes for March 2022 for Regents Park Ward (taken from Police UK website)

Crime levels overview

Crime for last year



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



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

Type	Total	Percentage
Anti-social behaviour	887	27.2%
Bicycle theft	85	2.6%
Burglary	118	3.6%
Criminal damage and arson	122	3.7%
Drugs	154	4.7%
Other theft	385	11.8%
Possession of weapons	21	0.6%
Public order	246	7.5%
Robbery	74	2.3%
Shoplifting	43	1.3%
Theft from the person	373	11.4%
Vehicle crime	108	3.3%
Violence and sexual offences	622	19.1%

Volume of crimes on Regents Park 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.’