

From:

Sent: 07 June 2022 14:53

To:

Cc: Planning

Subject: O2 Finchley Road further DOCO comments

Good afternoon,

In response to the minutes sent from the meeting regarding my previous comments on the proposed development of the O2 site. Points have been clarified and I can now support this application with the following recommendations:

I 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.

In relation to the minutes I have answered the points below (highlighted in blue. The minutes were an accurate record of the meeting.

Kind regards

Aran

- 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.***"

Design Team response: The Billy Fury Way and Granny Dripping steps are outside the planning red line of this application and are associated with heritage constraints. The application expects to work with the borough to encourage improvements to these areas. Therefore, the ability to significantly alter the design of these access points is limited. However, where influence can be achieved, we have proposed the entrances at both access points will be open, hence enhancing natural surveillance, and will be monitored by active surveillance cameras, that will be monitored 24/7. These access points will also be well lit. This development has been designed with the community at its centre, with the allowance for a number of green open spaces, which can be accessed from multiple directions. It is proposed within our reports that these areas are monitored by active surveillance cameras and has been designed such that natural surveillance has been maximised as much as possible. For example, all green and play areas are overlooked by the above residential apartments. The site is only accessible by pedestrians and disabled (blue badge) vehicle users, with a number of physical measures proposed to provide a level of vehicle mitigation.

All noted. The 24/7 monitoring of proposed CCTV is a positive for the site along with an on-site security team. It is imperative that the lighting strategy compliments this monitoring system. Having a capable guardian for the development will also be of benefit.

- 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.

Design Team response: The development is a mixed-use development with different user groups using the open green and play areas at different times of the day, with the proposal that this would also be used by community groups.

As mentioned above, the areas will be actively monitored by CCTV cameras and associated lighting, such that no secluded areas are created. It is planned that the site will also have 24/7 on-site management and security guarding. The total number of houses / apartments is circa. 1,800 across the development, which suggests that the residential areas will be very active throughout the day and night. Furthermore, mixed use/commercial amenities at ground floor have been carefully created/positioned to activate the public areas at most times of the day and evening.

It was discussed at the meeting that the applicant will be the owners of the site going forward and that it is not in their interest to have vacant units on the ground floor. They will look to activate these areas as quickly as possible to ensure good surveillance. The on-site security and CCTV 24/7 monitoring will also assist. Having a mix of residential on the ground floor activates this space further which is positive.

- 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.

Design Team response: LandSec are committed to creating a safe and secure place that mitigates and reduces crime. All buildings will have compartmentalisation. For this development, the client wishes to create a community and allow residents to mix between floors and within the amenity areas. The use of compartmentalisation will restrict this requirement – Hoare Lea will work with the design team to review other layers of control to reduce any of the above ASB, including how visitors will be managed. This is encouraging and it was mentioned at the meeting that secured by design

certification will be applied for. Compartmentation will be a key factor in safeguarding the residents.

- There is already a large night time economy for the borough of Camden and this could overspill 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.

Design team response: The specific users of the space within the new village square will be subject to RM App. The proposals will be carefully created to reduce resident impact.

Noted.

- 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.

Design Team response: We have been working with the architectural and landscaping teams to ensure that these areas are permeable and to prevent these issues from developing, including carefully selecting the location of trees, plants, lighting and seating to allow for the area to be used all times of the day and ensuring lines of sight aren't obstructed. This is to be further developed during the next design stage to include details on the types of plants to be used and the level of lighting across the development, including lighting plans. These will be discussed further with the DOCO as the design develops.

This again was discussed at some length and landscaping of this area will be an important factor ensuring CPTED principles and secured by design recommendations are followed. Happy to advise at any point during the design development.

- 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.

Design Team Response: There are currently no plans for any on-site parking, only the use of disabled parking spaces within the undercroft of each building. Further vehicle access will be limited to vehicles such as delivery, servicing and emergency vehicles. Access points here will be protected by a security rated gates and supported by CCTV and ANPR. A number of vehicle mitigations will

be included within the development to prevent vehicle incursion into and within the green areas. The undercrofts will be managed and only accessed through appropriate access control measures.

This is good but I would also like to see what is being done to mitigate against the potential risk of e-scooter, moped enabled offences which could take place.



Police Constable Aran Johnston
Design Out Crime Officer
Continuous Policing Improvement Command (CPIC)
5 The Oaks, Ruislip, Middlesex, HA4 7LF

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