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Your ref: 2022/1528/P
Our ref: 2022/1528/P

Good afternoon,

Thank you for allowing me to comment on the proposed **Reserved matters in relation to Zone A for revisions to the ground floor frontage and minor alterations to the previously approved application reference 2017/3133/P dated 16/08/2017 for erection of 7-11 storey building for use as offices (Class E) with ancillary staff facilities including a cafe, gym, pool, Multi Use Games Area, events centre and landscaped roof garden; retail at ground floor level and two levels of basement incorporating a loading bay, 4 x accessible parking spaces, mechanical plant; and works to public realm in Battle Bridge Place, King's Boulevard and Goods Way as required by conditions 6, 9,10,12, 14, 16-23, 26, 27, 28, 31, 33-38, 45, 46, 48, 49, 50A, 51, 56, 60, 64-67 of outline planning permission reference 2004/2307/P granted 22/12/06 subject to a S106 agreement for a comprehensive, phased, mixed-use development of former railway lands within the Kings Cross Opportunity Area at Development Zone A King's Cross Central, York Way, London.**

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

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 object to the proposal in its current form the following reasons:

It is strongly recommended that this location have security rated products to mitigate against the risk of burglary, criminal damage and other theft. The building itself will also be iconic and potentially a target.

The Issues are with the design of the frontage and the proposed security rating of the retail units.

- There are proposed HVM forming a raised planter/seating/concealment opportunity directly outside the retail outlets. The wooden portal cladding provides shelter and the area will become appealing to a pre-existing large street population. This will be especially evident when the shop frontages have closed for the evening and activity drops.
- The layout of the wooden portals break up the sight line allowing for concealment opportunities. During the day and throughout business hours this may not be an issue but when the frontages close if visibility is compromised then the fear of crime will be greater. This could also impact of violence against women and girls (VAWG) especially if there are licenced premises around the location with an extended opening/closing time.
- The exposed areas of cladding will be susceptible to criminal damage in the form of graffiti. The layout could affect light levels which should conform to BS 5489-1:2020. Does the positioning of the cladding allow for blind spots in the CCTV system which may not be able to be viewed by the security team? The team cover the Kings Cross estate and so might not be in this area during certain times of the day/night which will provide a reliance on CCTV monitoring.
- The European security rating for the doors and windows of the shop windows (RC2 and RC3) I believe are too low and LPS 1175 SR2 or STS 202 BR2 should be considered as alternatives. The RC2 and 3 are only rated for stealth attack and the tools at which they are tested against are not as diverse. I have emailed the applicant directly explaining my reasoning behind this.

If permission is granted I feel that increasing the security rating of the doors and windows is required.

- The proposed bi-fold doors which will fold down from the ceiling are proposed at only RC2 rating. If this cannot be upgraded to a higher security rating then I recommend that the next line of defence (second door set) be security rated to LPS 1175 SR2 or STS 202 BR2.
- 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.
- Consider individual seating, Camden style benches which encourage movement as opposed to lingering will reduce the potential for antisocial behaviour.
- Ensure that the portal and fixings such as the louvres cannot pose a climb risk or concealment opportunity.
- Anti-skateboard studs for those areas where this may become an issue.
- Access control for retail units and back of house to mitigate against the risk of a motivated offender gaining access to the google building through this potential route.
- Glazing should be enhanced at these locations. P4A or above is recommended. That is if the frame and product supports such an enhancement. There are other alternatives which include roller shutters rated to LPS 1175 SR2 or STS 202 BR2, internal retractable grilles to the same standards.
- Ground level bedding avoids extra seating opportunities and increases the lines of sight across the development. There are fewer concealment opportunities

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

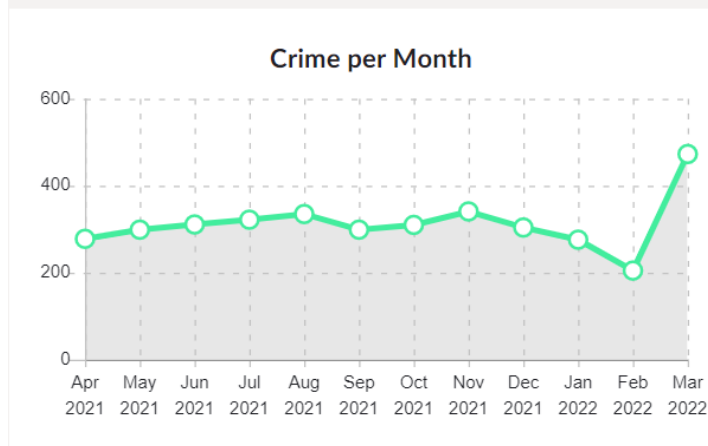
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”

Top reported crimes	
Most commonly reported crimes during Mar 2022	
Anti-social behaviour	156
Other theft	81
Violence and sexual offences	77
Theft from the person	34

Top reported crimes for March 2022 for St Pancras and Somers Town Ward (taken from Police UK website)

Crime levels overview

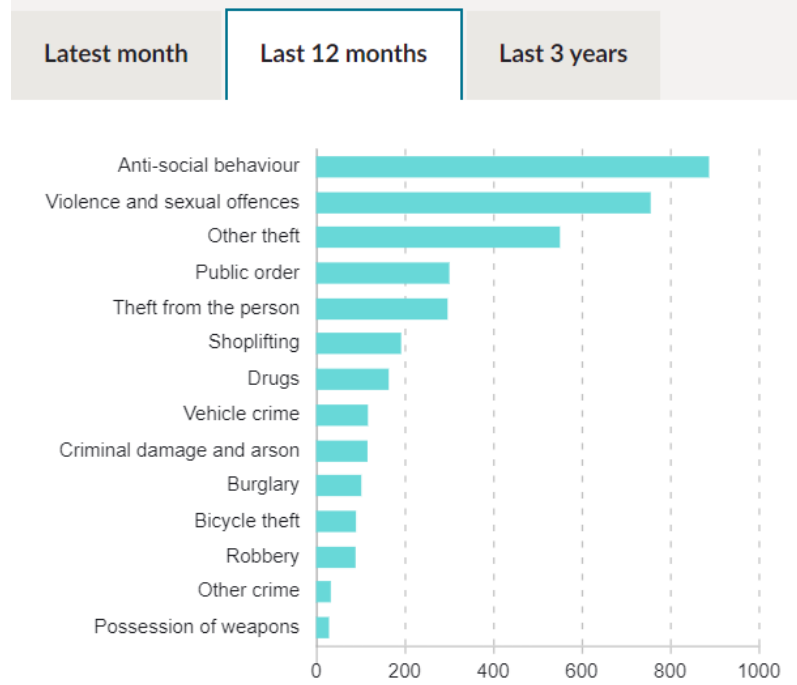
Crime for last year



Crime levels over the past twelve (12) months from St Pancras and Somers Town 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)



Crimes by description over the past twelve (12) months for St Pancras and Somers Town Ward (taken from the Police UK website)

Type	Total	Percentage
Anti-social behaviour	890	23.7%
Bicycle theft	92	2.5%
Burglary	104	2.8%
Criminal damage and arson	118	3.1%
Drugs	166	4.4%
Other theft	553	14.7%
Possession of weapons	31	0.8%
Public order	303	8.1%
Robbery	91	2.4%
Shoplifting	194	5.2%
Theft from the person	299	8%
Vehicle crime	119	3.2%
Violence and sexual offences	758	20.2%

Volume of crimes on St Pancras and Somers Town 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.’

