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**From:** Satchell, Stewart [REDACTED]  
**Sent:** 22 June 2022 11:54  
**To:** Planning Planning  
**Subject:** Objection: Application No: 2022/2019/P  
  
**Importance:** High

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

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**F.A.O Planning Case Officer Patrick Marfleet**

I am seeking to provide formal comment on application number 2022/2019/P. Whilst the intention of this application is considered positive in providing a community space for the benefit of all, there appears to be a lack of consideration and consultation around safety and security. It is for this reason that I am **objecting** to the proposal in the present format.

My role on behalf of British Transport Police (BTP) relates to Counter Terrorism (CT) protective security as a Counter Terrorism Security Advisor (CTSA). The network of CTSA's across the UK are overseen by the National Counter Terrorism Security Office (NaCTSO) in providing guidance around threat and vulnerability to terrorist attack methodology and mitigating the risks associated to protect the public and ensure business continuity.

**You may appreciate the sensitivity in some of the content of this email, I request that it is protected adequately within your organisation ensuring that it is made available on a need to know basis only and supervised accordingly.**

Terrorist attacks, including associated methodology, are a real and serious danger in the UK. The current threat level from terrorism to the UK mainland is assessed by the Joint Terrorism Analysis Centre (JTAC) as **'Substantial' meaning an attack is likely**. Crowded places and publicly accessible locations are likely to feature in the attack plans of terrorist organisations now and in the future, as these are usually locations with limited protective security measures and therefore afford the potential for mass fatalities and casualties. Current terrorist threats are likely to involve low sophistication methods using bladed and/or blunt force instruments to attack people. The use of Improvised Explosive Device (IED) whether person borne or placed to detonate, whilst more complex in nature, cannot be dis-counted.

**At the time of writing there is no specific intelligence relating to this site, main threats are likely to emanate from collateral effect as a result of incident(s) co-located elsewhere.**

I have noted with particular interest the proposed business plan (and notes of clarification) along with the Design and Access Statement (DAS). These set out the intention to provide event spaces, and as such may be densely populated with people. Indeed similar to the Highline located in New York, the facility itself is likely to be a tourist destination potentially raising the risk profile.

Within the documentation submitted there appears to be no reference to safety and security of the general public, either using the Highline itself or attending events. Licensing of events are may fall within the responsibility of the London Borough of Camden (LBC). It is unlikely licensing of such events will mitigate threats from terrorism.

The current application does NOT explain how the site intends to meet with LBC's own Planning Policy C5 Safety and Security, which states that the Council will aim to make Camden a safer place by:

- 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.

**In addition Policy C5 also states:** *Where a development has been identified as being potentially vulnerable to terrorism, the Council will expect counter-terrorism measures to be incorporated into the design of buildings and associated public areas to increase security.*

For the reasons set out above I wish to formally object to the planning application at this time. I would request that the application is rejected allowing further appropriate consultation to address the concerns of safety and security.

**I respectfully request that this email is restricted and marked 'Not For the Public Domain' and not to personally identify me as a consultee. Any response from a Counter Terrorism Security Advisor (CTSA) is deemed to be 'Sensitive Information in applications for planning permission and listed building consent' as per the Dept for Levelling Up Housing and Communities (DLUHC) formally the Ministry for Housing, Communities & Local Government (MHCLG) Planning Practice Guidance - Crown Development, Sensitive information in planning applications: Dated 06/03/2014. The circulation and viewing of this communication is to be accessed at a minimum of 'Official - Sensitive' level. No copying and circulation is to be allowed without the approval of the CTSA.**

Should you require further information or clarification on any of the above please do not hesitate to contact me at your convenience.

Kind Regards,

**Stewart Satchell GCGI MSyI**  
Counter Terrorism Security Advisor | CT Operations | E Division



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