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Your ref: 2022/2021/P  
Our ref: 2022/2021/P

Good afternoon,

Thank you for allowing me to comment on the proposed **Camden Highline comprising for phase one (1) Works relating to the “Camden Highline” ‘Phase 1’, a high level garden on existing viaduct, including access at Camden Gardens and Royal College Street, Commercial kiosks (within existing arches-Class E), seating area, pedestrian walkway, event spaces, woodland balcony and ancillary waste and storage facilities.**

This proposal is within the London borough of Camden in the policing ward of Camden Town with Primrose Hill. The top recorded crimes for the Month of April 2022 (taken from the Police.uk website) are violence and sexual offences, theft from the person, antisocial behaviour and other theft. There has been a marked increase in crime over the last month which appears starting to level out back to pre covid-19 levels. Other offences of note are drugs and public order.

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 and have recommendations to make:

- I have read through the document you sent through regarding the proposed operations and management of the Camden Highline. They have mentioned that they did speak with me at an earlier stage but failed to mention my recommendations in detail. I share the concern of the residents in this case. The staircase and seating area within Camden Street Park where the proposed entrance will be in my opinion will cause antisocial behaviour. I advised at the time that for an exposed staircase to be incorporated into the design the boundary (park) would have to be more robust. The height of the fence would have to increase to a

minimum of 1.8 metres. I would recommend both the railing and gate be security rated to either LPS 1175 SR2 or STS 202 BR2. The gates into Camden Street Park would have to be secured at the time the facility is closed. I also recommended that the arches be gated and secured overnight with gates to the same ratings. The height may have to be floor to ceiling to prevent persons climbing over.

- If the securing of this site at the parks boundary is not an option then I believe that the applicant will need to modify the design. The gating of the staircase will have to be in such a way that the stairs do not offer any form of seating opportunity overnight. It will also have to not afford an intruder a climbing opportunity. Activating the lower level during the day will be positive for the park and area but this legitimate activity will cease the moment the highline closes for the evening. This area will then attract people to the park for the wrong reasons.
- Lighting was mentioned and will be important as well as CCTV but this alone will not be deterrent enough if the initial design is flawed. Lighting to achieve BS 5489-1 2020 and be complimentary to any proposed CCTV system.
- The makeup of the management team should also be carefully considered. The gardening staff should not be relied upon for site security and emptying of the park at close. If this is to be done effectively and efficiently I recommend two (2) dedicated security personnel SIA registered to undertake this task and monitor the facility
- The highline will be prominent although the nature of the park will mean that it is completely obscured from view of any general police patrol. This could be picked up upon by criminal gangs who may seek to exploit this less observed route. It is key therefore that there are good lines of sight and excellent lighting in this area. There should also be reduced areas for potential concealment of persons, weapons or drugs.
- Signage and rule setting will be of use in this area also. The fact that staff will be working in the garden is again a positive note and indicates that there are capable guardians on site and the facility is well managed. This does reduce the risk of crime and antisocial behaviour from taking hold.
- With the entrance onto the railway at this site as well who will take responsibility for crime in this area? Will it fall to British Transport Police or Metropolitan Police? This could become confusing and lead to a possible delay in response times to an incident.
- Could the staircase be completely housed within the recess of the railway arch and then the whole archway secured overnight? I would recommend either gates or shutters to LPS 1175 SR2 or STS 202 BR 2 security rated products.
- The middle arch containing a long table and chairs to either be gated or the seats and table to be removed overnight. This would allow passage from one end of the park to the other (if securing the park overnight is not an option and gating the arch is not preferred).

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](http://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	82
Theft from the person	71
Anti-social behaviour	66
Other theft	64

*Top reported crimes for April 2022 for Camden Town with Primrose Hill ward (taken from Police UK website)*

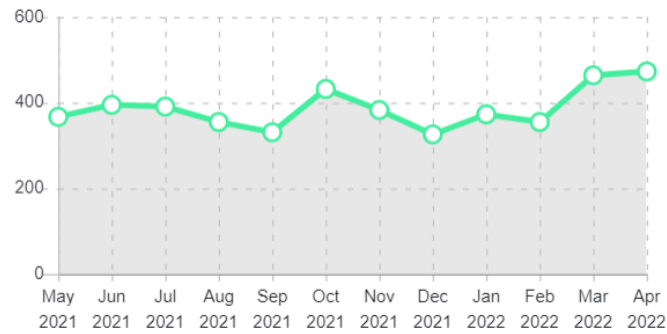
## Crime levels overview

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

Last 12 months

Last 3 years

### Crime per Month



*Crime levels over the past twelve (12) months from Camden Town with Primrose Hill ward (taken from Police UK website). From this illustration it can be seen that reported crimes within the ward are on the increase.*

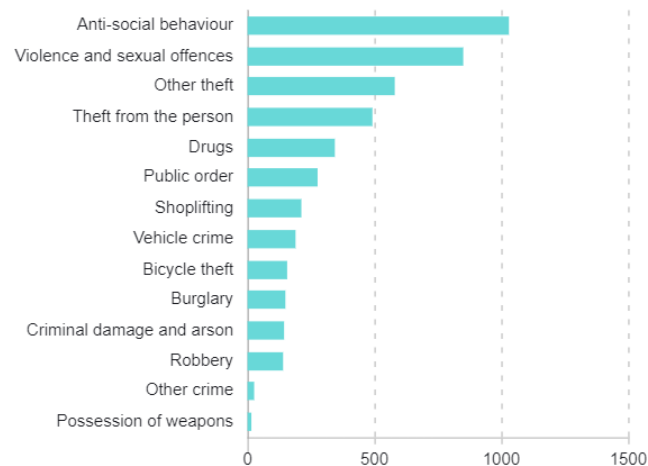
## Crime types description

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

Latest month

Last 12 months

Last 3 years



*Crimes by description over the past twelve (12) months for Camden Town with Primrose Hill ward (taken from the Police UK website)*

Type	Total	Percentage
Anti-social behaviour	1033	22.2%
Bicycle theft	159	3.4%
Burglary	152	3.3%
Criminal damage and arson	147	3.2%
Drugs	347	7.5%
Other theft	583	12.6%
Possession of weapons	18	0.4%
Public order	279	6%
Robbery	143	3.1%
Shoplifting	215	4.6%
Theft from the person	495	10.7%
Vehicle crime	192	4.1%
Violence and sexual offences	853	18.4%

*Volume of crimes on Camden Town with Primrose Hill 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](http://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.’*

