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Your ref: 2022/3578/P  
Our ref: 2022/3578/P

Good afternoon,

Thank you for allowing me to comment on the proposed **renovation and utilisation of 12 railway arches in flexible Class E uses, the demolition and reconstruction of two units beneath and adjacent to Metropolitan Railway bridge for utilisation in flexible Class E uses, the removal of non-compliant temporary prefab unit at 364 Kilburn High Road and improvements to the public realm including semi-mature trees, re-surfacing, and planters at Kilburn Mews, Kilburn High Street NW6 2QH**

This proposal is within the London borough of Camden in the policing ward of West Hampstead. The top recorded crimes for the Month September 2022 (taken from the Police.uk website) are violence and sexual offences, antisocial behaviour, other theft and public order. Other offences of note for this ward are vehicle crime and burglary.

I have had no previous meetings with the architect or applicant in regards to this proposal. Please refer to the appendix from crime figures and relevant legislation.

Whereas I do not object to the development there are some concerns and comments/recommendations which I have listed below:

- This development will rely on management of the site. It is noted that the perimeter is gated. I strongly recommend that the gates be security rated to either LPS 1175 SR2 or STS 202 BR2. The gates should be single leaf if possible and have at least two (2) points of locking evenly distributed one (1) third from the top and one (1) third from the bottom of the frame. I would be happy to advise once the preferred locking mechanism is known. The height of the gate should be two (2) metres or higher if permitted to reduce the risk of persons climbing at these locations. If there is an enclosed roof then consider floor to ceiling to remove this climb vulnerability.

- It is recommended that this site be closed overnight to prevent antisocial behaviour and crime taking hold during hours of darkness. If not secured there are numerous concealment opportunities within the area.
- It is recommended (dependant on use and individual perceived risk) that each arch either have a security rated door and window set (minimum of LPS 2081 SRB or LPS 1175 SR2 or STS 202 BR2). Consider other options such as internal retractable grilles rated to LPS 1175 SR2 (although this would not protect the glazing). One more option would be external roller shutters rated to either LPS 1175 SR2 or STS 202 BR2.
- Intruder alarms to be considered for each individual unit. 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.
- Enhanced glazing to BSEN 356 P4A (or above) for unit frontages.
- External lighting (if considered) for public areas/pavements/streets for secured by design should achieve BS 5489-1 2020. Lighting should be uniform so there are no pockets of darkness. Is the lighting complementary to any pre-existing or proposed CCTV system to ensure good facial definition and colour rendition?
- A formal, overt CCTV system should be installed and maintained by a member company of either the National Security Inspectorate (NSI) or the Security Systems and Alarms Inspection Board (SSAIB). Any such company will install a system to the British Standard. Images should be retained for a minimum of 30 days. This system would need to be registered with the Information Commissioner's Office, as it would be recording public areas. Appropriate signage indicating this fact needs to be displayed.
- For new cycle stands I recommend London stands instead of Sheffield style. This is due to the tapping bar allowing the user to place the bicycle lock above the bar preventing the lock from being moved onto the ground and smashed with a blunt object. The tubing can be filled with an aggregate such as concrete to provide extra weight and robustness. The stand should also be fitted into the ground to ensure no bolts are exposed. The location of the stands should ensure the greatest amount of natural surveillance and legitimate activity (footfall).
- Seating within the mews area and outside on the street side near the junction of Maygrove Road should be modular to ensure that if any issues should arise it is more cost effective to remove or relocate any proposed seating.

If yourself or the applicant wishes to discuss any of my recommendations further then please feel free to contact me. 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/HOMES_BROCHURE_2019_update_May.pdf)

The advice has been adjusted taking into consideration crime statistics and analysis of the area.

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.”*

### **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)

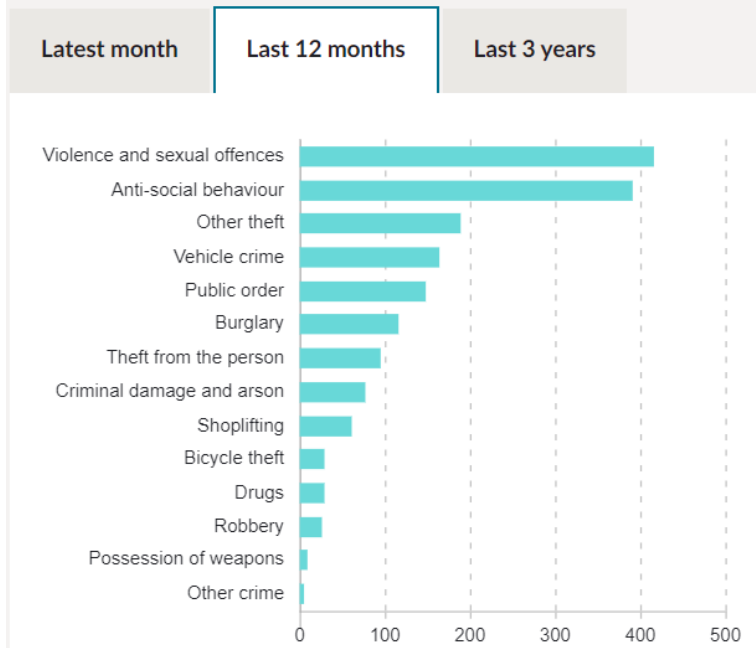
*‘Crime prevention advice is given freely without the intention of creating a contract. Neither does the Metropolitan Police Service take any legal responsibility for the advice given. You must abide by the fire and safety regulations and if you are in any doubt consult the Fire Prevention Officer and the Council’s Building Control Officers.’*

<b>Top reported crimes</b>	
Most commonly reported crimes during Sep 2022	
<b>Violence and sexual offences</b>	<b>45</b>
<b>Anti-social behaviour</b>	<b>23</b>
<b>Other theft</b>	<b>15</b>
<b>Public order</b>	<b>14</b>

*Top reported crimes for West Hampstead Ward for the month of September 2022*

## Crime types description

for the last 12 months (from Oct 2021 to Sep 2022)



*Top reported crimes for West Hampstead Ward over the last year*

Type	Total	Percentage
Anti-social behaviour	392	22.2%
Bicycle theft	30	1.7%
Burglary	117	6.6%
Criminal damage and arson	78	4.4%
Drugs	30	1.7%
Other theft	190	10.7%
Public order	149	8.4%
Robbery	27	1.5%
Shoplifting	62	3.5%
Theft from the person	96	5.4%
Vehicle crime	165	9.3%
Violence and sexual offences	417	23.6%
Possession of weapons	10	0.6%

