

From: [REDACTED]
Sent: 14 November 2022 13:34
To: Planning Planning [REDACTED]
Cc: David Fowler [REDACTED]
Subject: O2 centre masterplan - 2022/0528/P DOCO comment

Good afternoon,

Please find attached the comments for the amended O2 masterplan. I have attached the minutes from the last meeting I had with the developer. If you have any questions regarding any of the comments and recommendations then please do not hesitate to get in contact.

Kind regards

Aran



Police Constable Aran Johnston
Design Out Crime Officer
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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

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- 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.



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Your ref: **2022/0528/P**
Our ref: **2022/0528/P**

Good afternoon,

Thank you for allowing me to comment on the proposed **RECONSULTATION - DUE TO AMENDMENTS Detailed planning permission for Development Plots N3-E, N4, and N5 including demolition of existing above ground structures and associated works, and for residential development (Class C3) and commercial, business and service (Class E) uses in Development Plot N3-E, residential development (Class C3) and local community (Class F2) and commercial, business and service (Class E) uses in Development Plot N4, and residential development (Use Class C3) and commercial, business and service uses (Class E) uses in Development Plot N5 together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots. AMENDMENTS NAMELY: reconfiguration of commercial space and flats (including amendments to housing mix) and residential space, additional plant at Plot N3E podium level, facade and entrance amendments, changes to blue badge parking and cycle stores, introduction of pressurised plant and associated fire related amendments, reconfiguration of PV panels, full basement to plot N3E, localised basement/semi depressions to Plots N4 and N5 to accommodate pressurisation system (no significant changes to the height and massing of detailed proposals). Outline planning permission for Development Plots N1, N2, N3, N6, N7 ,S1 and S8 including the demolition of all existing structures and redevelopment to include residential development (Class C3) commercial, business and service uses (Class E), sui generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots. AMENDMENTS NAMELY: for design codes for Plots N1 and N2 limiting bulk of the taller elements, ensuring variation in height of the taller buildings, and articulated and pitched roofs along Finchley Road. Design codes.**

The development falls within the policing ward of West Hampstead. The top recorded crimes for September 2022 (taken from the police UK website) are violence and sexual offences, antisocial

behaviour, other theft and public order. Other offences of note are burglary, vehicle crime and theft from person.

I do not object to this development but have the following comments and 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.

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Similar developments within Camden:

156 West End Lane, Abbey Road, The Avenue and Liddell Road. All have benefited from the advice of Met Police design out crime officers. The proposed site should be no different and should be conditioned to achieve SBD certification.

Please refer to Appendix A for illustration of crime figures and local as well as national planning policy

Further consultation is required in the pursuit of achieving SBD certification for the development. 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/SBD_Commercial_2015_V2.pdf

The advice has been adjusted taking into consideration crime statistics and analysis of the area. Further consultation is required in the pursuit of achieving SBD certification for the development.

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

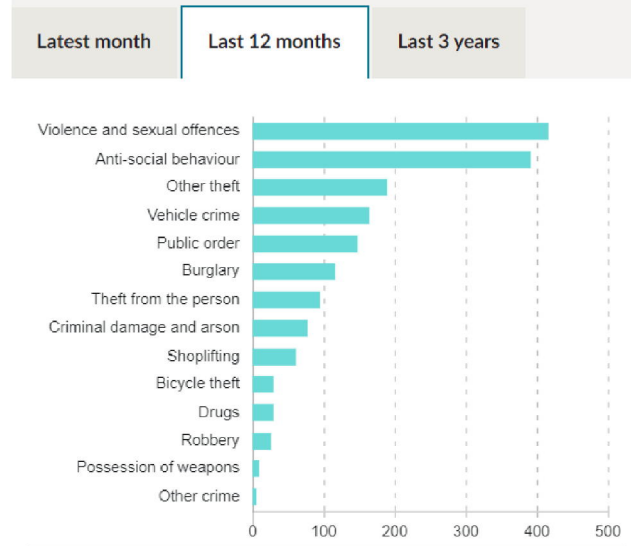
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”



Line graph showing the number of crimes over the last twelve (12) months for West Hampstead ward.

Crime types description

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



Bar chart indicating the types of recorded crimes over the last twelve (12) months on West Hampstead

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%

Number of crimes on West Hampstead over the last twelve (12) months

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.’