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**Development Management**

Regeneration and Planning

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Your ref: **2021/2954/P**  
Our ref: **2021/2954/P**

Good Afternoon,

Thanks you for allowing me to comment on the **redevelopment (Ammendments) of Selkirk House, 166 High Holborn and 1 Museum Street following the substantial demolition of the existing NCP car park and former Travelodge Hotel to provide a mixed-use scheme, providing office, residential, and town centre uses at ground floor level. Works of demolition, remodelling and extension to 10-12 Museum Street, 35-41 New Oxford Street, and 16A-18 West Central Street to provide further town centre ground floor uses and residential floorspace, including affordable housing provision. Provision of new public realm including a new pedestrian route through the site to link West Central Street with High Holborn. Relocation of cycle hire docking stations on High Holborn. REVISIONS NAMELY: reduction in height of proposed tower by two storeys, widening of the floor plates of the proposed tower, changes to elevations and entrances, change of Vine Lane block from co-working to residential, increase in affordable housing to 51% of residential uplift.**

The development falls within the policing ward of Holborn and Covent Garden. The top reported crimes for September 2022 (taken from the police UK website) are other theft, theft from person, antisocial behaviour and violence and sexual offences. Other offences of note for this area are burglary and robbery. This area has a higher than average crime rate for London owing to the larger number of persons visiting. This is reflected in the crime types (other theft, theft from person and robbery) where tourists are often the victims of acquisitive crime.

**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.

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.

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

**1 Museum Street**

- Cycle access stair from ground level to basement levels where the bicycle stores and shower/changing rooms are located. For the external cycle access door I recommend an LPS 1175 SR2 or STS 202 BR2 security rated door. It should be single leaf and have an auto close function to prevent tail gating. Access should be through encrypted key fob with a data logging facility to record usage.
- If there is lift to access the basement bicycle store the lift needs to be wide enough to accommodate bicycles comfortably. It is recommended that the lift be accessed controlled through encrypted key fob.
- For cycle stores we recommend two (2) layers of security and this can be achieved with another security rated door at the bicycle store itself. I recommend a PAS24:2016 security rated door. Again this door should be single leaf, auto close feature, and encrypted key fob with data logging. Cycle stores are good areas to have CCTV coverage. Any lighting in this area needs to compliment the CCTV to provide good colour identification.
- The stands within the store should be either set into the ground or wall ensuring no fixings/bolts are exposed. The stand should allow for three point of locking. If there are numerous companies working in this building (and as is my understanding this store will also be used by the office/commercial Vine Lane Block) consideration needs to be given to separating the store into different sections (each separate and lockable) to prevent possible issues and conflict.
- With the auto close feature on the entrance door to the cycle store a press to release mechanism/button is advised to prevent persons becoming trapped inside. These press to release buttons should only facilitate egress from inside the building to outside and not permit access further within the development.
- Next to the access for the cycle stair is another door leading into a hallway which heads into the centre of the building. It is recommended that this door be for emergency egress only and that there is no means of opening the door from the public realm. Consider alarming this door and install an auto close feature to prevent this door being propped open.
- It is noted that for these proposed buildings that there are no residential units on ground level. There are potential retail, commercial and office space allocations. This means that during the day the area will have some activity and decent footfall providing a good level of natural surveillance. After hours this area will have little to no legitimate activity. There is a nearby public house and this night time economy could overspill into the landscaping around this development causing a rise in antisocial behaviour. Consideration needs to be

given to gating sections of this area off to prevent the environs becoming an antisocial behaviour hotspot. I would recommend an LPS 1175 SR2 pedestrian gate with key fob access. The height of the perimeter boundary railing should be a minimum of 1.8 metres although 2.1 metres is recommended as the risk of this being climbable is greatly reduced.

- Within the lobby there are no reception desks noted. It is strongly recommended that reception desks be considered. They should take up a central position so staff can easily observe the main entrance. This has the added benefit of increasing natural surveillance and deterring crime as well as acting as a helpdesk for visitors trying to find their way within the building or local area.
- There appears to be some form of access control to access the central lift area within the lobby. There also appears to be an uncontrolled area passing between the two (2) proposed entrances where there may be a potential to access two (2) of the lifts. The main activity will be around the central lifts and the area behind will be less observed. Consider securing this location to prevent this area becoming a cut through for the general public. Also consider a higher security rating for the doors around this location. PAS24:2016 or LPS 1175 SR2 depending on risk and value in reference to the rooms contents. I recommend encrypted key fob access with data logging for ground floor doors leading off the lobby.
- Main entrance door needs to be robust, I recommend an LPS 1175 SR2 or STS 202 BR2. Access through encrypted key fob with data logging. I also recommend audio and visual intercom for after business hours to be located at the entrance. This is to ensure any visitors are suitably vetted prior to entry.
- For the delivery area I recommend LPS 1175 SR2 roller shutters. There should be little to no recess and the shutters need to be as flush to the building line as possible. Any doors leading from this location and basement level should be PAS24:2016 rated. Again access controlled through encrypted key fob with data logging. Single leaf with an auto close feature to prevent tail gating. Intercom at the loading bay entrance to be audio and visual to best vet persons wishing to gain entry into this location.
- For any glass facades on the ground floor facing the public realm I recommend a minimum of P2A glazing.
- Consider compartmentalising the building. If there are numerous companies working within the building there could be potential conflict between the different users. Compartmentalisation controls the movement of persons. This greatly reduces the risk of opportunistic crime and eradicates potential crossover. Access control all floors with encrypted key fob access and data logging to record usage. This also includes the lifts and stair core. Any recommendations need to be checked with a fire officer or building control with reference to lifts and stairs as they will form part of the fire strategy.
- The building should have no areas of crossover between commercial and residential. These areas can lead to potential conflict and should be avoided. This includes having no shared spaces such as communal corridors, bicycle stores and refuse stores the same.
- LPS1175 SR2 doors for any office rooms housing expensive or sensitive equipment.
- Any garden amenity/roof terrace should be closed during hours of darkness.
- Maintenance access only for roof access
- Any brickwork pattern such as hit and miss that could pose a climbing opportunity should start above 3.5 metres from ground level.
- Any gable ends to consider anti-graffiti paint treatment. Also consider a layer of defensive planting or a railing to create a defensible space protecting these vulnerable areas. The

current existing site suffers with poor surveillance and has numerous graffiti on the buildings.

- Consider reducing any recessed areas of areas which create an undercroft. These areas tend to attract groups who can loiter increasing the chance of antisocial behaviour from happening. They can also create concealment opportunities.
- Utility metres to be accessed externally. This reduces the number of persons needing access within the building reducing the risk of both opportunistic and artifice thefts.
- Fixtures and fittings to be recessed to prevent them becoming a climbing opportunity.
- Consider CCTV with complimentary lighting. 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.

### **Terrace landscaping**

- Due to the fact that this area should be private and for employees only the only recommendations for this area are to keep these areas private.
- Consider CCTV.
- Good lighting of the area to assist with safe movement from the door around the designated paths.
- Controlled access with data logging facility
- Consider closing these areas after a certain time (hours of darkness).
- Good lines of sight to assist visibility and reduce the likelihood of concealment.

### **Vine Lane Block**

- The ground floor lobby entrance is recessed. It is recommended that this be minimal if not brought up flush with the building line. Any recess which allows persons to shelter from public view, inclement weather can increase the risk of both tail gating and antisocial behaviour.
- Main entrance door needs to be robust, I recommend an LPS 1175 SR2 or STS 202 BR2. Access through encrypted key fob with data logging. I also recommend audio and visual intercom for after business hours to be located at the entrance. This is to ensure any visitors are suitably vetted prior to entry.
- Within the lobby there are no reception desks noted. It is strongly recommended that reception desks be considered. They should take up a central position so staff can easily observe the main entrance. This has the added benefit of increasing natural surveillance and deterring crime as well as acting as a helpdesk for visitors trying to find their way within the building or local area.
- There is a corridor with an external door to the North of the lobby which provides access to UKPN. It is recommended that the exterior door be security rated to LPS 1175 SR2 or STS 202 BR2. The interconnecting door leading into UKPN should be a minimum of PAS24:2016. Access should be for maintenance and UKPN staff. The door should be single leaf, auto close feature and have access through encrypted key fob.

- From the office lobby there are no points to control access prior to entering the lift. I recommend that the lift be activated through staff passes/encrypted key fobs. With this in place movement can be controlled around the building. If there are multiple companies in residence on different floors the key fobs they are issued can reflect this and only permit them access to where they need to be.
- For the stairs core the access control needs to continue in order to secure and compartmentalise the building. This would entail a PAS24:2016 (key fob access) door leading from the lobby onto the stair core and then PAS24:2016 (key fob access) on all floors accessible from the stair core. For egress consider a press to release system which allows for free flow of persons out of the lobby in an emergency. Please consult the fire officer or building control to check whether this recommendation impacts on the fire strategy for the building.
- I recommend data logging for all key fob access points to record usage. Controlling the movement of persons within a building significantly reduces the risk of opportunistic theft.
- The employees of this building are allocated cycle parking within the basement level of 1 Museum Street. Recommendations for this facility have already been covered in previous recommendations. It is felt that the building should have its own cycle store (located behind two lines of defence) within the Vine Lane block.
- For the other floors any rooms allocated to house expensive equipment I recommend an LPS 1175 SR2 or STS 202 BR2 security rated door.
- Access to the terrace/garden on the fourth floor should be closed during hours of darkness.
- Access to the roof should be for maintenance only.
- Any brickwork pattern such as hit and miss that could pose a climbing opportunity should start above 3.5 metres from ground level.
- Any gable ends to consider anti-graffiti paint treatment. Also consider a layer of defensive planting or a railing to create a defensible space protecting these vulnerable areas. The current existing site suffers with poor surveillance and has numerous graffiti on the buildings.
- Consider reducing any recessed areas of areas which create an undercroft. These areas tend to attract groups who can loiter increasing the chance of antisocial behaviour from happening. They can also create concealment opportunities.
- Utility metres to be accessed externally.
- Fixtures and fittings to be recessed to prevent them becoming a climbing opportunity.
- CCTV with complimentary lighting to be considered for the exterior/entrance and communal areas (internal). 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.

### **Landscaping of green roof**

- Due to the fact that this area should be private and for employees only the only recommendations for this area are to keep these areas private.
- Consider CCTV

- Good lighting of the area to assist with safe movement from the door around the designated paths.
- Controlled access with data logging facility
- Consider closing these areas after a certain time (hours of darkness).
- Good lines of sight to assist visibility and reduce the likelihood of concealment.

## High Holborn

- The ground floor plan shows a recess area to the North where the access is required for the cycle store and bin store. It is strongly recommended that the gate and boundary be brought to the building line. In its current form there is an area for possible concealment in close proximity to the seating area in the public realm. This area could become attractive to groups that wish to go unnoticed. It is believed that this area could suffer with antisocial behaviour. The risk of tail gating at this area also increases. I recommend a security rated metal gate to LPS 1175 SR2 or STS 202 BR2. The gate should be single leaf with an auto close feature. There needs to be protection around these features so they cannot be attacked from the public realm. Consider installing protective shrouds around vulnerable areas. I recommend access be through encrypted key fob with data logging to record usage. The height of the gate and boundary railing should be a minimum of 1.8 – 2.1 metres (depending on local planning permissions). The gate and fence should be visually permeable to allow for persons using the gate to know if anyone is waiting the other side. Increased visibility lowers the fear of crime. Consider defensive planting as an additional layer of protection. Plants such as pyracantha can be used to great effect. If a press to release button is to be considered at this location from the private residential side then this needs to be away from the public realm (unreachable) and also in a place where it cannot be damaged or tampered with.
- The cycle store is behind two lines of defence which is what we recommend. The first line of defence will be the external gate. For the second it is recommended a PAS24:2016 security rated door be used. Again this door should be single leaf, auto close feature, and encrypted key fob with data logging. Cycle stores are good areas to have CCTV coverage. Any lighting in this area needs to compliment the CCTV to provide good colour identification.
- The stands within the store should be either set into the ground or wall ensuring no fixings/bolts are exposed. The stand should allow for three points of locking.
- The bin store is also accessed from the rear gated area. It is good that both the cycle store and bin store have no interconnecting doors which provide access deeper into the building. I recommend either a PAS24:2016 or LPS 1175 SR1 door at this location. This again will require key fob access, single leaf with an auto close feature.
- Main entrance door needs to be robust, I recommend an LPS 1175 SR2 or STS 202 BR2. Access through encrypted key fob with data logging. I also recommend audio and visual intercom. This is to ensure any visitors are suitably vetted prior to entry. There should be no trade's button function on the intercom. Also ensure that fire drop keys are not used. Fire drop keys are purchased very cheaply. When activated they cut the power to the door allowing for uncontrolled access until the key has been reset. These keys are being used by criminal gangs to easily by-pass security features.
- Consider compartmentalising the building. Compartmentalisation controls the movement of persons. This greatly reduces the risk of opportunistic crime. Access control all floors with encrypted key fob access and data logging to record usage. This also includes the lifts and

stair core. Any recommendations need to be checked with a fire officer or building control with reference to lifts and stairs as they will form part of the fire strategy.

- There is an airlock type lobby where if not already it is recommended external mailboxes are located. Key fobs can be issued to Royal Mail for postal delivery and these can be programmed to only allow access through the first entrance door. DHTS 009 mailboxes are recommended at this location.
- PAS24:2016 front doors for all residential units.
- PAS24:2016 windows for anything below 3.5 metres or any window reachable from the public realm or any shared communal space.
- Roof access for maintenance only.
- Any brickwork pattern such as hit and miss that could pose a climbing opportunity should start above 3.5 metres from ground level.
- Any gable ends to consider anti-graffiti paint treatment. Also consider a layer of defensive planting or a railing to create a defensible space protecting these vulnerable areas. The current existing site suffers with poor surveillance and has numerous graffiti on the buildings.
- Consider reducing any recessed areas of areas which create an undercroft. These areas tend to attract groups who can loiter increasing the chance of antisocial behaviour from happening. They can also create concealment opportunities.
- Utility metres to be accessed externally.
- Fixtures and fittings to be recessed to prevent them becoming a climbing opportunity.
- CCTV with complimentary lighting to be considered for the exterior/entrance and communal areas (internal). 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.

## **West Central Street**

- The basement has an area of flexible space which is separate from the rest of the layout which is good. The basement also contains plant rooms and the like. The cycle stores are located on basement level. There are two (2) proposed stores. One (1) for the affordable homes and another for market sales. Both cycle stores require the same levels of security. As previously stated we recommend two (2) lines of defence. The exterior doors leading into the lobby areas are one line. The second can be the lift if this is activated through encrypted key fob (recommended). I would still advise another layer for the actual entrance to the cycle store. I recommend a PAS24:2016 door with key fob controlled access. The door should be single leaf, auto close feature to prevent tail gating and have a data logging facility to record usage. CCTV in cycle stores is also recommended. This needs to be in conjunction with a complimentary lighting scheme. The cycle stands within the stores should be set into the ground or wall to ensure no bolts are left exposed. The stand should allow for three (3) points of locking. I recommend a press to release system within the store in order to prevent persons from becoming trapped inside.
- There seems to be only one lift that accesses the basement level. This must be of a size to easily accommodate bicycles as well as other residents. I recommend this be key fob activated. This measure will aid in compartmentalisation of the building.

- There are two (2) entrances for this build, it is not known whether one (1) has been designated a main entrance and the other a rear entrance. There needs to be the same level of security on both in any case. Main entrance door needs to be robust, I recommend an LPS 1175 SR2 or STS 202 BR2. Access through encrypted key fob with data logging. I also recommend audio and visual intercom. This is to ensure any visitors are suitably vetted prior to entry. There should be no trade's button function on the intercom. Also ensure that fire drop keys are not used. Fire drop keys are purchased very cheaply. When activated they cut the power to the door allowing for uncontrolled access until the key has been reset. These keys are being used by criminal gangs to easily by-pass security features.
- There is an airlock type lobby where if not already it is recommended external mailboxes are located. Key fobs can be issued to Royal Mail for postal delivery and these can be programmed to only allow access through the first entrance door. DHTS 009 mailboxes are recommended at this location.
- The bin stores similar to the cycle stores have been split into affordable and market sales. They both have the same vulnerability in that there is an interconnecting door leading from the interior to the store and then out through the exterior door. It is recommended that the bin stores have only an externally accessed door. These areas are commonly a flash point for antisocial behaviour. They are often a soft target and used in a number of ways including drugs use and the concealment of weapons. I recommend an LPS 1175 SR2 or STS 202 BR 2 door. The door should be single leaf and have an auto close feature. Access should be through encrypted key fob with data logging. A press to release button should be installed at this location to prevent persons becoming inadvertently trapped inside. The button should only enable egress out of the building and not back into the main footprint.
- Consider compartmentalising the building. Compartmentalisation controls the movement of persons. This greatly reduces the risk of opportunistic crime. Access control all floors with encrypted key fob access and data logging to record usage. This also includes the lifts and stair core. Any recommendations need to be checked with a fire officer or building control with reference to lifts and stairs as they will form part of the fire strategy.
- PAS24:2016 front doors for all residential units.
- PAS24:2016 windows for anything below 3.5 metres or any window reachable from the public realm or any shared communal space.
- Roof access for maintenance only.
- Any garden amenity/roof terrace should be closed during hours of darkness, if this is possible through the design. This is to prevent any residents causing issues during unsociable hours.
- Any brickwork pattern such as hit and miss that could pose a climbing opportunity should start above 3.5 metres from ground level.
- Any gable ends to consider anti-graffiti paint treatment. Also consider a layer of defensive planting or a railing to create a defensible space protecting these vulnerable areas. The current existing site suffers with poor surveillance and has numerous graffiti on the buildings.
- Consider reducing any recessed areas of areas which create an undercroft. These areas tend to attract groups who can loiter increasing the chance of antisocial behaviour from happening. They can also create concealment opportunities.
- Utility metres to be accessed externally.
- Fixtures and fittings to be recessed to prevent them becoming a climbing opportunity.



- CCTV with complimentary lighting to be considered for the exterior/entrance and communal areas (internal). 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.

#### **Communal courtyard green space**

- Defensible space is required if windows and doors are accessible from the shared communal space. Consider a railing to 1.2 metres in height (or higher) to clearly mark out the private residence. Defensive planting can also be used to add another defensive line.
- Good lines of sight are required.
- Ground level bedding will aid visibility and remove any unofficial seating areas.
- Consider modular non clustered individual seating that can be easily removed should problems arise.
- Residents only space no access for general public.
- Good light levels to prevent concealment opportunities.
- Foot paths to be lit from stairs/lifts to door to assist safe movement.
- Directional column lighting is favoured over bollard style.

#### **Exterior landscaping**

- Good lines of sight are strongly recommended. This will increase visibility. The greater the visibility the lower the fear of crime.
- The visitor cycle stands should be London style as opposed to Sheffield. The London stand has a tapping bar where the bicycle locks will be secured above. This prevents the lock being moved down to the ground where it is vulnerable to an attack from a blunt instrument. The stands should be set into the ground to ensure no bolts are exposed. Consider filling the tubes of the stand with cement to increase the weight and robustness. The position of the stands needs to be considered carefully. They need to be positioned in a location which ensures the best natural surveillance. Within the inner paths of the development there will be no active frontage on the ground floor after a certain time. The amount of footfall will also decrease when the commercial/office units close. Consider placement of these stands on the busiest section of road where the footfall will be highest. Often placing them near a main entrance will also give added surveillance depending on whether these entrances are staffed (reception/concierge).
- Ground floor bedding is recommended over raised planters. This both assists with visibility decreasing concealment opportunities and also takes away further seating opportunities.
- Benches should not be clustered, individual seats should be created to prevent persons lying down. They should be of a design that prevents the concealment of weapons or drugs within the bench area. The benches should be designed so they can easily be removed if antisocial behaviour becomes an issue.
- The area needs to be well lit with column lighting. External Lighting to achieve BS 5489-1:2020 and BS EN 12464-1:2002, and for emergency lighting to pedestrian areas to comply with BS 5266-1.

- Consider CCTV coverage for this area. The lighting needs to compliment this recommendation.
- Avoid recesses and undercroft areas as these areas tend to attract large groups to the area who loiter and move on to cause antisocial behaviour.

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/HOMES_BROCHURE_2019_update_May.pdf)

[https://www.securedbydesign.com/images/downloads/SBD\\_Commercial\\_2015\\_V2.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](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.”*

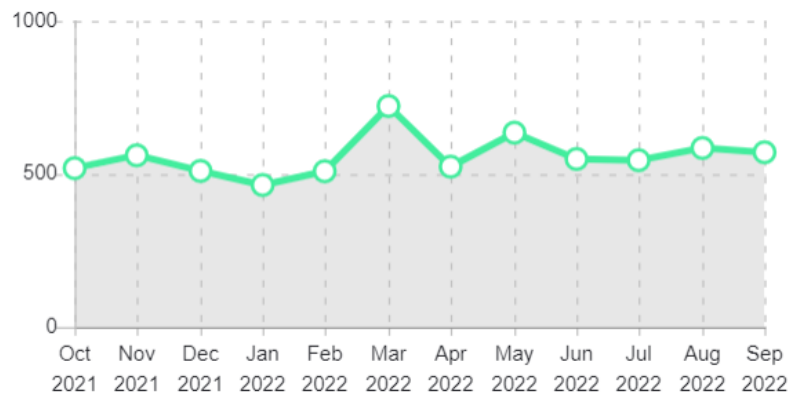
## Crime levels overview

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

Last 12 months

Last 3 years

### Crime per Month



Line graph showing the number of crimes over the last twelve (12) months for Holborn and Covent Garden Ward. Taken from the police UK website.

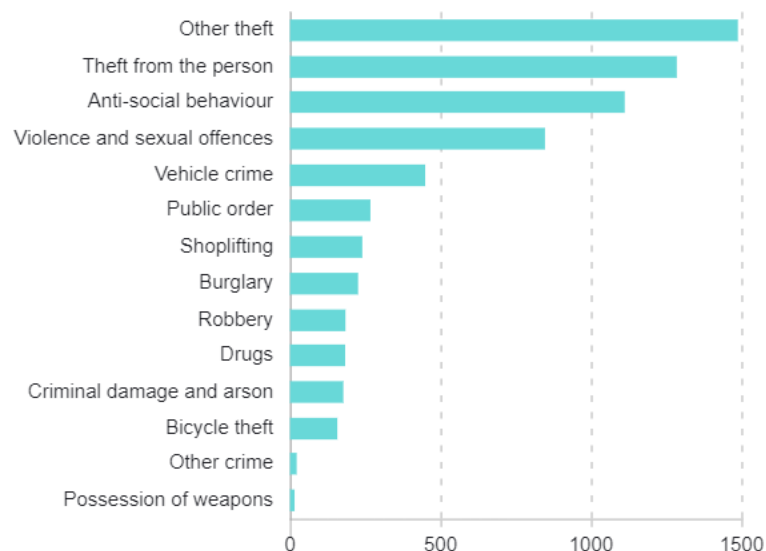
## Crime types description

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

Latest month

Last 12 months

Last 3 years



Bar chart indicating the types of recorded crimes over the last twelve (12) months on Holborn and Covent Garden Ward. Taken from the police UK website.

Type	Total	Percentage
Anti-social behaviour	1115	16.7%
Bicycle theft	160	2.4%
Burglary	229	3.4%
Criminal damage and arson	180	2.7%
Drugs	186	2.8%
Other theft	1491	22.3%
Possession of weapons	18	0.3%
Public order	270	4%
Robbery	187	2.8%
Shoplifting	243	3.6%
Theft from the person	1288	19.2%
Vehicle crime	452	6.8%
Violence and sexual offences	850	12.7%

*Number of crimes on Holborn and Covent Garden 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.’*