



Haringey Planning Control
C/O Tobias Finlayson

Your ref: HGY/2020/0795

Our ref: NE 5485

Related NE 3090

Designing Out Crime Office

Bow Road Police Station

111-117 Bow Road

Tower Hamlets

E3 2AN

Telephone: 0208 217 3813

Email: leslie.gipps@met.police.uk

Dated: 11/5/2020

Re: Planning Application at: Former Petrol Filling Station 76 Mayes Road N22

Dear Haringey Planning,

Proposal: Redevelopment of the site to provide a single building of between 4 and 9 storeys in height, comprising 75 residential units (C3) and 953 sqm of flexible commercial floorspace (Use Classes A1-A5, B1 and B8), with associated cycle parking, plant, refuse and recycling provision, landscaping and all necessary ancillary and enabling works).

Section 1 - Introduction:

Thank you for allowing us to comment on the above planning proposal.

With reference to the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.

It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).

I can confirm we have held a video meeting with the project Architects to discuss Crime Prevention and Secured by Design (SBD). The design team have supplied a DAS response for Planning in regard to the basic of SBD requirements which is acceptable for a stage 2 application.

We discussed the perimeter treatments, external envelope, external lighting, façade curtain walling, access control, but have not completed the internal compartmentation as it was deemed too early in the project by the design team.

Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can be easily mitigated early if the Architects or Managing Agency was to discuss this project prior to commencement, throughout its build and by following the advice given. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative:

In light of the information provided, we request the following Conditions and Informative:

Conditions:

- a) Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. The development shall only be carried out in accordance with the approved details.
- b) Prior to the first occupation of each building or part of a building or use, 'Secured by Design' certification shall be obtained for such building or part of such building or use.
- c) The Commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.

Reason: In the interest of creating safer, sustainable communities.

Informative:

The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

Section 3 - Conclusion:

We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.

Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Leslie Gipps', with a stylized flourish extending from the bottom right.

Leslie Gipps 707TP
Designing Out Crime Officer
Metropolitan Police Service

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

Appendix 1: Concerns and Comments

In summary we have site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the **available** plans from the LBoH planning portal. Site specific advice may change depending on further information or site limitations as the project develops:

- **Boundary Treatment** – Site specific recommendations
- **Under-croft** – The adjacent ramp provides a dark sheltered area that will support rough sleeping, anti-social behaviour, graffiti and street crime, this area must be lit to a minimum of BS 5489:2013
- **Car Parking** – It's not clear who will have access to park under the ramp area, this needs to be clarified
- **Door/Window Specifications** – Site specific recommendations provided to design team
- **Balconies/Climbing Aids** – Balconies should be designed so that they have flush fitting glazed balconies or a flush fitting trim around the base of the balconies so as to not create a climbing aid. Any external drainpipes should be of square design and fitted flush to the wall to reduce the opportunity to climb.
- **The perimeter treatment/gates** - The design should not provide opportunities to climb. If such examples cannot be designed out and climbing may be possible then vulnerable properties must achieve a minimum of LPS 175 SR1.
- **Communal Entrance** - Site specific recommendations provided to design team
- **Lobby/Airlock** – Site specific recommendations provided to design team
- **CCTV** – It is advised that CCTV is installed covering the main entrance, the hallway/airlock/postboxes as minimum. This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinate with the planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use.
- **Postal strategy** – It would be advised that all post is delivered into an airlock (preferred) or through the wall to reduce the likelihood of tailgating and postal theft. Through the wall letter plates should incorporate a sloping chute and anti-fishing attributes to mitigate against mail theft and meet TS008 standard. If post is to be delivered into an airlock then these should be securely surface mounted and meet TS009 standard.

- **Bike Storage** – Site Specific Recommendations. We recommend that there should be 3 points of locking for the bikes and signage for residents advising to lock their bikes appropriately. The bike store should not be advertised from the outside to further deter opportunistic crime and access should only be provided to those who register with the Managing Agency.
- **Bin Storage** – External entrance door should be a single LPS 1175 SR2 UKAS certified door-set incorporating self-closing hinges, a thumb turn on the inside of the door, PIR lighting and 358 close weld mesh reinforcement on the internal face of louvers, if they incorporate a slatted ventilation design. This should be data logged and fob controlled with 2 maglocks sited 1/3 from the top and bottom and able to withstand 1200lbs/500kg of pressure individually.
- **Lighting** – A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots. It is advised that this reaches a level of 40% uniformity and is compliant to BS 5489:2013. Dusk till dawn photoelectric cells with ambient white lighting is advised for best lighting practice. Bollard lighting as a primary light source is not recommended as it does not provide suitable illumination and creates an “up lighting effect” making it difficult to recognise facial features and thus increase the fear of crime.

Appendix 2: Planning Policy

DMM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"

DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred."

An Independent Sustainability report by AECOM on Tottenham area action plan states: "Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".

12.3 of same report states:

- Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.
- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- There are no references to crime in the **neighbourhood area sections**; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard.

Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.

- In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

Appendix 4: Crime Figures

The crime figures provided below are publicly available on the Internet at <http://www.met.police.uk/>. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.

Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:



