



London Borough of Haringey
Planning and Building Control
6th Floor River Park House
225 High Road
Wood Green
N22 8HQ



Dated: 25/01/2024

Your ref: HGY/2023/3078

Planning Case Officer : Nathan Keyter

Our ref: NE 7193

Re: Planning Application at:

Tottenham Hale Station, London Underground Ltd, Station Road, Tottenham, London, N17 9LR

Proposal:

Section 73 application to vary Conditions 1 and 11 of the approved development (application ref. HGY/2018/1897 which amended the original permission HGY/2013/2610 for changes to the works to extend the operational railway station at Tottenham Hale). The variations are to replace the requirement of providing a new station entrance and footbridge from Hale Village to Tottenham Hale Station, to instead requiring pedestrian and cycle network improvements on Ferry Lane and accessory works.

Dear Haringey Planning,

Section 1 - Introduction:

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

With reference to the above application we have 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) and 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).

We have not met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns around the design and layout of the development and can only base our observations and comments on the information available within the planning portal. At present there is no mention there is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.

At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

Whilst in principle we have no objections to the proposed development from a designing out crime perspective there have been concerns raised in other aspects of policing and public safety which need to be considered in the finer details of the application. These parties have been made aware and some have made representation. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process.

Section 2 - Conditions and Informative:

This project does not have the ability to achieve Secured by Design accreditation as it does not involve the built environment but the following condition allows the MPS to be involved in all stages of the development from concept to construction.

Conditions:

- A. The development shall implement features to reduce crime and promote a safe environment for the public to the satisfaction of the Metropolitan Police, details of which shall be provided in writing to the Local Planning Authority

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

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCs) to achieve accreditation. The services of MPS DOCs 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 solid black rectangular box used to redact the signature of the Designing Out Crime Officer.

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 overall 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 architect and local authority planning portal.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application.

Lighting

- Declaration of conformity – Lighting scheme should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance.
- Whether adopted highways/footpaths/private estate roads or car parks lighting should meet should meet BS 5489:2020 standard.

CCTV

The development should be supported with HD CCTV in all areas that the public have access to and any valuable equipment such as entrances, lobby areas, post box, refuse store, cycle stores parking areas and stair cores.

The footage must be of evidential value and stored for a minimum of 31 days. All footage to be time and date stamped and recorded in a format that is accessible to the local authority and police. CCTV systems should conform to BS EN 62676: 2014 - video surveillance systems.

Appendix 2: Planning Policy

London Plan 2021

Policy D11: Safety, Security and Resilience to Emergency

This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.

Section B of policy D11

Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally

justified, should be set out in Development Plans.

Section C of policy D11

These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism.

New buildings should therefore be **resilient** to all of these threats.

Paragraph 3.11.3

Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

Paragraph 3.11.4

The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Paragraph 3.12.10

Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

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 3 : 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:





Whilst we cannot provide information down to street area the above information does indicate the level of ASB and associated crime that is typical for the ward, which should be a consideration when designing a development to ensure the reduction in fear of crime as well as crime itself.

It is also important to note that this area is well known location for robberies and similar crimes against the person

Anti-Social Behaviour (ASB)

Particular attention must be drawn to the most prevalent type of incident that will be experienced – **Anti-Social Behaviour (ASB)**. This category covers a multitude of types of incident that can range from what appears quite trivial annoyance to serious criminal acts. Often victims are able to shrug off the minor incidents and do not have the time or energy to report every occurrence, however en mass these create a significant problem.

Research by Ward, Thompson and Tseloni (2017) which was quoted in the victim commissioners report on ASB in 2019 stated:

Less than a third of ASB incidents were reported to the three main reporting agencies - According to the 2015/16 CSEW, approximately 31% of ASB incidents were reported to the police, local authority or housing association/private landlord. Of those reported, most were reported to the police (of all agencies).

It is therefore reasonable to assume that the statistics regarding ASB misrepresents the true scale of the problem – the actual figure of incidents is likely to be well over **32 incidents** of ASB per month.