



Haringey Planning Control
C/O Sarah Madondo

Your ref: HGY/HGY/2024/1203

Our ref: NE 8134

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: 22nd May 2024

Re: Planning Application at: HGY/2024/1203 - 39, Queen Street, London, N17 8HZ

Dear Haringey Planning,

Proposal - *Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.*

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).

We have not met with the project Architects or Agents to discuss Crime Prevention or Secured by Design (SBD). The Architects have not made mention in the Design and Access Statement with reference to design out crime, crime prevention, safety of lone women and girls, vulnerable young people and have not specified exactly what features of the design will reduce crime.

There could be some conflict between the required access to the site, the recent bus stop traffic measure and the proposed Selby Centre planning application, and this requires a review.

Whilst in principle we have no objections to the intention at 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:

(1) Prior to the first occupation of each building or part of a building or use, a '**Secured by Design' accreditation** shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.

(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.

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', written over a circular stamp or seal.

Leslie Gipps 2093CO
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.

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

- **Boundary Treatment** – Site specific recommendations, further information required
- **Car Parking** – Site specific recommendations
- **Door/Window Specifications** – Site specific recommendations, further information required
- **Communal Entrance** - Site specific recommendations, further information required
- **Lobby/Airlock** – Site specific recommendations, further information required
- **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 to LPS 1175 SR2/B3 standard 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 5489:2020. 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. Planned lighting activation following forced entry to be linked to intruder alarm.

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: Approved Document Q

Whilst it is accepted that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject area.

That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.

I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application.

For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website www.securedbydesign.com.

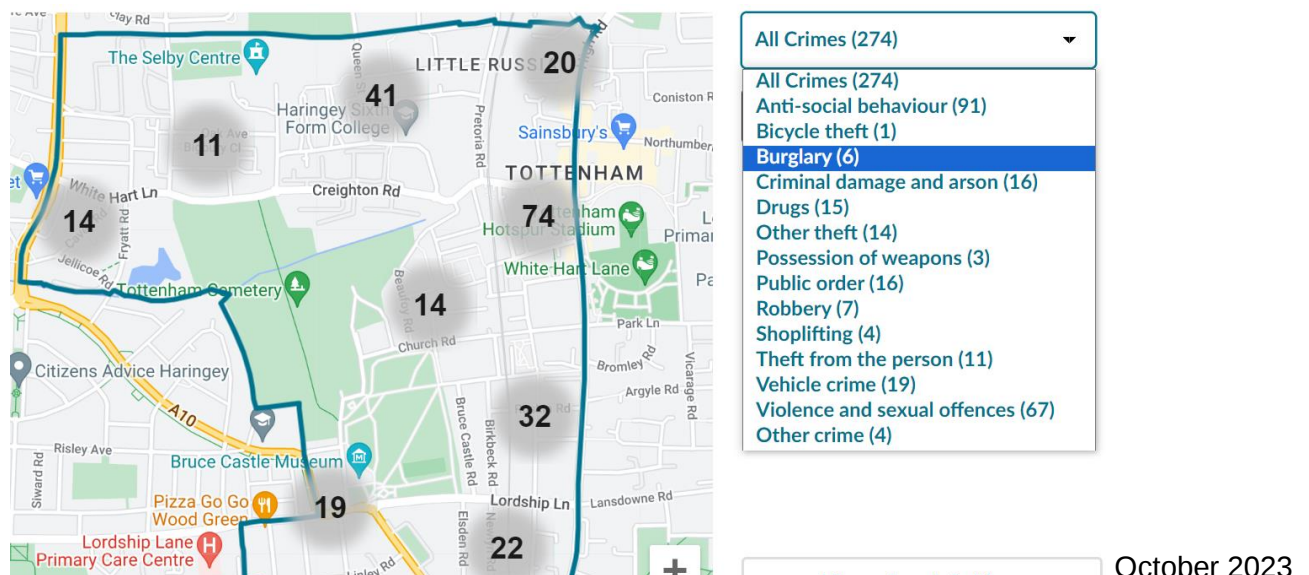
The measures recommended are not intended to be prescriptive but to provide a suitable direction for the development. As a matter of course, all due consideration should be given to the SBD Commercial guide (available online via <https://www.securedbydesign.com/guidance/design-guides>

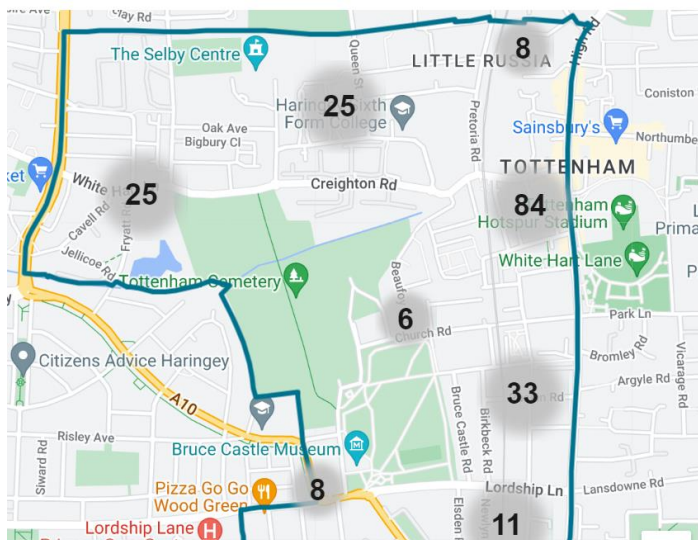
Appendix 4: Crime Figures

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.

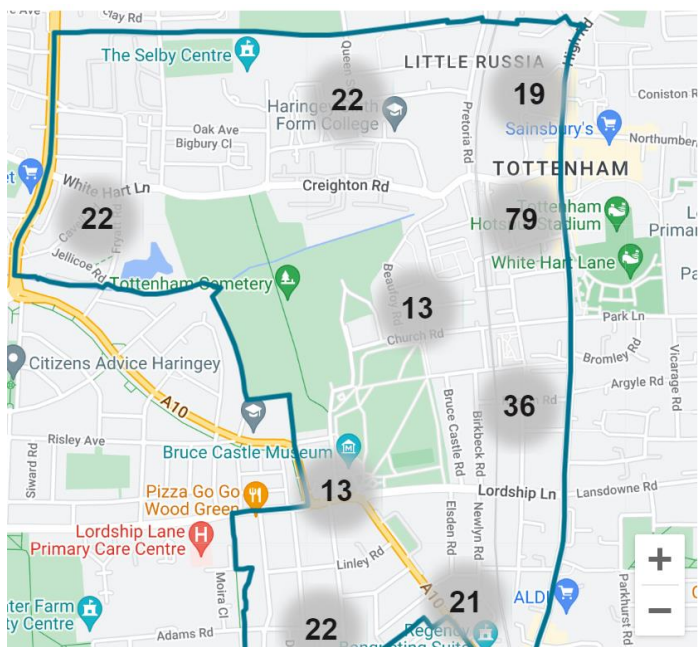
The following figures relate to recorded crime data from Police.uk for the Bruce Castle ward below area:





All Crimes (226)
All Crimes (226)
Anti-social behaviour (77)
Bicycle theft (3)
Burglary (13)
Criminal damage and arson (13)
Drugs (10)
Other theft (10)
Public order (10)
Robbery (4)
Shoplifting (2)
Theft from the person (13)
Vehicle crime (28)
Violence and sexual offences (41)
Other crime (2)

November 2023



All Crimes (247)
All Crimes (247)
Anti-social behaviour (69)
Bicycle theft (3)
Burglary (5)
Criminal damage and arson (23)
Drugs (22)
Other theft (20)
Public order (19)
Robbery (8)
Theft from the person (18)
Vehicle crime (17)
Violence and sexual offences (42)
Other crime (1)

[View crime definitions](#)

[Download area crime data](#)

December 2023