

ADDENDUM REPORT FOR ITEMS

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No.

<b>Reference No:</b> HGY/2023/3058	<b>Ward:</b> Tottenham Hale
<b>Address:</b> Down Lane Recreation Ground, Park View Road, Tottenham, London	
<b>Proposal:</b> Planning application for Phases 2a and 3 of the Down Lane Park Improvement Programme: demolition of former Park Pavilion and Park Depot Buildings (and associated structures), and basketball court to allow for construction of a new Community Hub Building and Community Garden, new basketball and netball courts, new children’s play area, access routes, entrances and associated soft and hard landscaping.	
<b>Applicant:</b> London Borough of Haringey’s Regeneration and Parks and Leisure Departments	
<b>Ownership:</b> Public	

*To note: the numbering as set out in this addendum corresponds with the numbering of each section within the Officers committee report*

#### **4. ADDITIONAL REPRESENTATION AND CONSULTATION RESPONSES**

A letter of support has been submitted from Living Under One Sun (set out in appendix 1) and is summarised as follows LUOS have supported the scheme and requested some detailing that goes beyond the considerations of this planning application.

A consultation response has been received from The Designing Out Crime Officer (attached at appendix 1)

Crime Prevention officers have confirmed that they have been involved in the scheme from the pre-application stage. Their comments have largely been incorporated into the design of the proposal. They are satisfied that the final details can be secured by conditions alongside secured by design accreditation. Condition 7 has been amended to reflect the Met Police’s condition wording.

The applicant has responded to the comments from the Carbon Management teams has addressed the questions raised. A condition regarding ASHP noise limits has been added as a result.

## AMENDED CONDITIONS AND INFORMATIVES

Condition 7 wording will be amended to:

- 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. Accreditation must be achievable 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.

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 its use, '**Secured by Design**' certification shall be obtained for such building or part of such building or its use *at the final fitting stage, prior to occupation of such building in accordance with part (b) above and commencement of business* and thereafter all features are to be retained.

The development shall only be carried out in accordance with the approved details.

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

Additional Condition:

24. The design and installation of Air Source Heat Pump hereby approved shall be such that, when in operation, the cumulative noise level arising from the proposed plant, measured or predicted at 1m from the facade of nearest residential premises shall be not exceed the proposed level of 35dB. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 1997. Upon request by the local planning authority a noise report shall be produced by a competent person and shall be submitted to and approved by the local planning authority to demonstrate compliance with the above criteria.

Reason: The level of noise from the air source heat pump is, so far as practicable kept to a minimum so as to minimize its effect on the amenity of the surrounding properties and general area. In order to protect the amenities of nearby residential occupiers consistent with Policy D14 of the London Plan 2021 and Policies DM1 and DM23 of The Development Management DPD 2017.

Additional Informatives:

INFORMATIVE The applicant must seek the continual 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](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.

INFORMATIVE It must be noted that whilst the public element of the park cannot achieve accreditation it must adhere to the practices and principle of Designing out Crime and be guided by the advice of the Designing out Crime Officer

**Appendix 1 – FULL CONSULTATION RESPONSE AS RECEIVED.**

Stakeholder	Representations	Officer comments
<b>EXTERNAL</b>		
Metropolitan Polices Designing Out Crime Officer	<p><b><u>Section 1 - Introduction:</u></b></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>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), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>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).</p> <p>We have met with the project architects and LbH Regeneration (Interim) &amp; Economic Development Programme Manager to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns around the design and layout of the development. At this stage consideration has been made to improve safety in the public domain and to implement a security strategy that reduces crime and the fear of crime. We request that the design team and developer remain in contact with our department to ensure that the development achieves the appropriate accreditation on completion.</p> <p>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.</p> <p>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 easily be</p>	<p>Comments noted, with secured by design accreditation to be secured by condition.</p>

mitigated early if the Architects ensure the ongoing dialogue with our department which continues throughout the design and build process. 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. Accreditation must be achievable 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.

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 its use, '**Secured by Design**' certification shall be obtained for such building or part of such building or its use *at the final fitting stage, prior to occupation of such building in accordance with part (b) above and commencement of business* and thereafter all features are to be retained.

The development shall only be carried out in accordance with the approved details.

**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 (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.
- It must be noted that whilst the public element of the park cannot achieve accreditation it must adhere to the practices and principle of Designing out Crime and be guided by the advice of the Designing out Crime Officer

**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,

**Lee Warwick 1977CO**

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.

It has been noted that there have been several meetings with minutes and recommendations documented by the architects which facilitate early pre-application advice given by our department. Should this advice be taken, then SBD accreditation will be achieved.

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.

**Note** - That the pre-application phase concentrated on the design of the layout of the development, the following also provides the material aspect of the physical target hardening requirements to achieve Secured by Design accreditation and this has not been discussed in detail with the architects or developers.

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

**Community Hub**

<b>A- Boundary Treatment</b>	
<b>Height</b>	Ideally side and rear boundary onto the public realm for the hub should be 2.1-2.4m
<b>Fencing Material Metal</b>	Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing.
<b>Railing Fencing</b>	All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing.

<b>Gating</b>	Designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment
<b>Recess</b>	Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm.
<b>Anti- Climb</b>	If anti-climbing measures are introduced then signage should be used to comply with occupiers liability Act 1984.
<b>Fencing Type</b>	Any boundary treatments should be UKAS certified as recommended by a DOCO
<b>Low Height boundaries</b>	All low defensive wall/railings to be designed to deter sitting, loitering and climbing.
<b>Access Control</b>	
<b>Communal Entrance</b>	All Hub entrances include a primary and secondary secure line and be developed in conjunction with any access control system and security strategy
<b>Communal Door Accreditation</b>	<p>All hub entrance doors should be accredited to one of the following UKAS certified products subject to a crime risk assessment by a DOCO:</p> <p>LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or  STS202 Issue 3:2011 BR 2+ or  LPS2081 SRB or  Equivalent certification</p> <p>*Door/s should be self-closing, self-locking single doors*</p> <p>Consideration can be given to providing accreditation to asset rooms and or secondary layers</p>
<b>Doorset Preferred Locking Mechanism</b>	Magnetic locks (Communal areas) - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom.
<b>Access Control</b>	Access control may be required to provide access to the building from the staff inside, to maintain control of visitors to partially accessible areas ( by invite only ) such as the function room



		All panels to have audio/visual capability.	
	<b>Access Panel</b>	Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293.	
	<b>Audio/Visual Entry (Camera)</b>	DDA (Part M) compliant camera alone is insufficient for first entry door. Primary camera location on access control panel to be considered to capture all visitors. Secondary camera will be required to the side/height that provides the resident a clear image of the visitor.	
	<b>Data Retention Fob Access</b>	Data retention of access control activations should be utilised throughout the site with the facility to store data for one calendar month before over writing. This data should be available to Police within 24 hours for evidential purposes should it be required. *Consideration to be given to appropriate and sufficient hard drive storage*	
	<b>Integrated (Part B/ ADQ) Compliance</b>	Access control systems should be Integrated to utilise both fire and security systems.	
	<b>Emergency Release (Push To Exit)</b>	Primary egress routes that are required to have an emergency escape mechanism should be self-re-setting, shrouded and in best practice be alarmed.	
	<b>Plant Room/ Service Rooms</b>	All service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * Service/plant door/s should be self-closing, self-locking single doors*	

<p><b>Pedestrian &amp; Vehicular Gates</b></p>	<p>Access controlled external pedestrian and vehicular gates that provide entry to the development should be accredited to LPS1175 SR2 or equivalent and include Magnetic locks - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom. Designed level to the front building line, be anti-climb and fitted with a dampened stop.</p>
<p><b>Internet Of Things (IoT)</b></p>	<p>Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT.</p>
<p><b>ACB (Access Control Box) / Fire Access - Apartment Entrance</b></p>	
<p><b>Access Control Box (ACB)</b></p>	<p>Situated within 2m of the main entry door (externally) at a height of at least 2.100m or above. An external fire over ride switch (FOS) should protected with the use of an accredited security product such as a Gerda Box. Consideration to other suppliers of this type of fire switch protection method should be given, check SbD web site. In addition to the use of an ACB see below re Premises Information Box (PIB).  <a href="https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/access-control-box-(acb).aspx">https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/access-control-box-(acb).aspx</a></p>
<p><b>Premises Information Box (PIB)</b></p>	<p>Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance).</p>
<p><b>DropKey Protection Box(DPB)</b></p>	<p>If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made.   The project fire consultant should be made aware of any Part B Security v's Safety conflicts  <a href="https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx">https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx</a></p>

## Doors

	<p>All entrance main doors into the building should be accredited to LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SRB or PAS24:2016 (Subject to crime risk assessment) Equivalent certification</p> <p>*Communal door/s should be self-closing, self-locking single doors*</p>
<b>Secondary doors</b>	<p>Any Internal Communal Access Door/s that provided a safety and security aspect are required to be dual certified to the following minimum standards:</p> <p>PAS24:2016 (Subject to crime risk assessment)</p> <p>Part B Fire resistance must be taken into Consideration for the door.</p>

## Windows

<b>Accessible Windows &amp; Roof Lights</b>	<p>All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either:</p> <p>*PAS24:2016 with BS EN356:2000 min. P2A glazing (consider P3A)</p> <p>*STS204 Issue 6:2016,</p> <p>*STS202 Issue 7:2016 Burglary Rating 1</p> <p>*LPS1175 Issue 7.2:2014 Security Rating 1 or</p> <p>*LPS1175 Issue 8:2018 A1 Security Rating 1 or</p> <p>*LPS 2081 Issue 1.1:2016 Security Rating A.</p> <p>Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)</p>
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	<p><b>Glazed Apertures</b></p>	<p>All glazing in and adjacent to:  *Communal windows that are easily accessible above ground floor level.  Should incorporate security glazing to the equal standard of the agreed door specification.</p>	
	<p><b>Lockable Window Handles</b></p>	<p>Any window within 2m of an accessible surface should have key operated locks. Where windows form an escape route, Part B (Fire) compliance should be adhered to. All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access.</p>	
	<p><b>Curtain Walling</b></p>	<p>Curtain walling systems facing the covered pergola and the front elevation should be certificated to either:  *LPS1175 SR2  *BS EN1627 RC3. <b>(With minimum of BS EN356:2000.P4A Glazing)</b>  *PAS24:2016  Curtain wall systems are non-structural cladding systems for the external walls of buildings. Typically curtain wall systems comprise a lightweight aluminium frame onto which glazed or opaque infill panels can be fixed. These infill panels are often described as 'glazing' whether or not they are made of glass.</p>	
	<p><b>CCTV</b></p>	<p>CCTV should be used to support entrances and areas of concern on all edges of the building</p>	
<p><b>Refuse Stores</b></p>			

	<b>Building Access</b>	Ideally should not allow access into the building from the refuse store.	
	<b>Street Access</b>	<p>Door/s (single leaf where at all possible) into stores from street should be either</p> <ul style="list-style-type: none"> <li>• LPS1175 SR2 or</li> <li>• STS202 BR2/B3</li> </ul> <p>Note - Single leaf doors are available up to approx. 1500mm to and will facilitate 1100cc bins in LPS and STS. This will eliminate the weakness of the passive leaf manually operated locking system which leaves double doors more vulnerable.</p>	
	<b>Doors</b>	Single leaf, self-closing and self-locking with access control, ideally using magnetic locks to the previous documented standard. (2 x 500kg resistance (1200lbs/psi) positioned 1/3 from the top and 1/3 from bottom).	
	<b>louvre</b>	If louvre doors are used, these should be of robust construction (ideally steel) supported with a layer of steel mesh to the rear to prevent unauthorised access to the locking mechanism and prevent general misuse.	
	<b>Lighting</b>	A suitable level of lighting to be present within store, ideally low level at times of inactivity and full level illumination when in use. To compliment any CCTV. External lighting to be Dusk to Dawn covering door set.	
	<b>Signage</b>	No signage to be erected externally which would provide opportunity for other building users or passers-by to dump their rubbish or fly tipping.	
	<b>Water Supply</b>	Any water supply, should be protected from misuse. This can be either by a lockable housing or a Lock shield bib-cock tap.	

<b>Positioning &amp; Materials</b>	Positioning - Consideration be given to position of external store as not to create hiding places, climbing points or assist general misuse. Attention should be given to fire risk.	
<b>CCTV</b>	Where at all possible CCTV should be present (Consideration should be given to location of camera/s and how internal elements may restrict coverage)	
<b>J - Roof Access</b>		
<b>AOV</b>	AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access.	
<b>Hatch &amp; Ladder/s</b>	Any Hatch should be secured with a minimum of Sold Secure Gold padlock. Fixed Ladders should be avoided as they will require mitigation measures. Any access should be facilitated by the maintenance team own equipment.	
<b>Roof Lights</b>	Easily accessible roof lights should be a one of the following standards: <ul style="list-style-type: none"> <li>• PAS24:2016 or</li> <li>• STS 204 (issue 6: 2016) or</li> <li>• LPS1175 (issue 7: 2014) SR1 or</li> <li>• LPS1175 (issue 8: 2018) SR1 / A1 or</li> <li>• STS202 (issue 7: 2016) BR1 or</li> <li>• LPS2081 (issue 1.1: 2016) SR A</li> </ul>	
<b>Roof Door Access</b>	If door access is required for "maintenance only" the door should be PAS24:2016 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only.	

<b>Lighting</b>	
<b>Public Realm lighting</b>	Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard.
<b>Declaration of Conformity</b>	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.
<b>Internal lighting</b>	Communal elements of any scheme, ideally should be controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected)
<b>Lux levels</b>	<p>Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm).            Examples of suitable Lux levels are listed below:</p> <ul style="list-style-type: none"> <li>• Office interior (security) 05 Lux</li> <li>• Private car parks 10 Lux</li> <li>• Exterior Rural location 10 Lux</li> <li>• Exterior Urban location 20 Lux</li> <li>• Walkways 30 Lux</li> <li>• Loading bays 50 Lux</li> </ul> <p>Further guidance is available in the "Lighting against crime" manual.</p>
<b>Uniformity (Uo)</b>	<p>The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following:</p> <ul style="list-style-type: none"> <li>• Values of between 0.25 and 0.40</li> <li>• Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index.</li> <li>• Good lighting will use energy efficient lamps in suitable luminaries.</li> </ul>
<b>Dusk-Till-Dawn Lighting</b>	Lighting, where possible should consist of white light which is evenly distributed

	<p>In Communal areas:</p> <ul style="list-style-type: none"> <li>• All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically.</li> </ul> <p>On Residential units:</p> <ul style="list-style-type: none"> <li>• All entrances (front, back, side doors) should also have dusk till dawn lighting, via a photo electric cell with a manual override. Allowing business users full local control.</li> </ul>	
<b>Bollard lighting</b>	<b>Shall be avoided</b> due to its history of vandalism and ease covering. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination.	
<b>Directional lighting</b>	Can be used to support pedestrian routes. Should robust and vandal resistant and be part of an overall lighting strategy (as shown above) Directional lighting should not be a standalone solution to illumination.	
<b>Gates</b>		
<b>Gate/s to parks yard</b>	<p>Ideally gated full height or with infill panels above.  Access control and gate/s to be as close to the forward building line as possible.  There should be minimal gap beneath the gate.  Designed to deter or prevent climbing.</p> <p>Any gate design to be submitted and approved by DOCO</p>	
<b>Ironmongery</b>	All gates should be fitted using anti tamper proof hinges. All hinges and brackets must be fitted in such a way so as not to create a climbing aid.	
<b>Push to Exit</b>	<p>If access controlled and not key operated and egress button should be minimum of 1.5 metres away from gate and fully shrouded.  Any associated cabling to be out of sight.</p>	
<b>Pedestrian Gate/s</b>	<p>Designed to deter or prevent climbing.  All pedestrian gates to have a minimum of 2 x 500kg resistance magnetic locks.</p>	



	Ideally positioned 1/3 from top and 1/3 from bottom. To be single leaf, self-closing and self-locking.
<b>MUGA Gates</b>	These should be access controlled through the hub and should not be free access. Access control to be determined with the DOCO. All gates into the MUGA should be single gates self closing and self locking

### Climbing Points

<b>Rain Water Pipes</b>	External rain water pipes should be square/rectangular, flush to the wall or recessed – if round they should be shrouded up to 3m minimum from ground level and have close/flush fitting brackets.
<b>Adjacent features</b>	Consider vulnerability of the roof by fences and the following <ul style="list-style-type: none"> <li>• Trees.</li> <li>• Door canopies.</li> <li>• Street furniture.</li> <li>•</li> <li>• ACB and utility meters.</li> <li>• Any outbuildings such as cycle and refuse store.</li> <li>• Vehicles in parking areas.</li> </ul>

### Utility Meters

<b>Utility Meters</b>	All utility meters should be positioned where possible in external risers or cupboards removing the requirement for an official to enter the building to read them. Smart meters should be the default requirement for all developments.
<b>Management Plan</b>	If utility meter is to be located within residential unit representatives must have a scheduled appointment made with the concierge or Management Company to gain access to the building.

### Car Parking

<b>Location</b>	Positioned as close as possible to buildings and overlooked by active windows. Should not be located close to boundary walls allowing vehicles to be used to climb into properties.
<b>Lighting</b>	Should be well lit to the latest standard of BS5489 (consider Park Mark guidance) <a href="https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf">https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf</a>
<b>C.C.T.V</b>	All car park areas should be covered by CCTV.
<b>Alarm / C.C.T.V</b>	
<b>Alarm Consideration</b>	If an alarm is to be installed should meet BS EN 50131 (as minimum) which can include wireless systems. If an alarm is not fitted installers should provide a labelled 13amp fused spur on consumer unit for future use.  <a href="https://www.policesecuritysystems.com/">https://www.policesecuritysystems.com/</a>
<b>CCTV Installation</b>	Please note where a development requires CCTV, this facility is to compliment other security measures, not to replace them. As a minimum police recommend coverage of the following areas: <ul style="list-style-type: none"> <li>• Entrance &amp; exit points including secondary coverage of call points,</li> <li>• Café / Lobby areas,</li> <li>• Store rooms</li> <li>• Function space</li> </ul>
	<ul style="list-style-type: none"> <li>• Refuse stores,</li> <li>• Underground or covered parking areas,</li> <li>• Top of stair cores</li> </ul>

		Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site specific risk assessment.
		Homes 2019 (55.3.7) requests the system conforms to BS EN 62676: 2014 - video surveillance systems - and where applicable BS7958: 2015 CCTV management and operation codes of practice (COP) as outlined by the requirements of the Information Commissioner's Office.
	<b>Quality</b>	Should be of good facial recognition and colour HD quality in both daylight and night vision.
	<b>Housing &amp; Signage</b>	CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development.
	<b>Storage &amp; Access</b>	Footage should be preserved for a minimum of 31 days.
		Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office.
		To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2016 door or SR1 lockable steel cabinet.
		Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.
<b>Party Walling</b>		
	<b>Communal to Apartment Walling Preferred System</b>	Light weight framed walls either side of a secure door set (including 600mm around the whole door set) and partitioned walls between two dwellings or communal space shall meet the requirements below: <ul style="list-style-type: none"> <li>• LPS1175 (Issue 7.2) SR1</li> <li>• LPS1175 (Issue 8) SR1/A1</li> <li>• STS202 Issue 7 BR1</li> </ul>
	<b>Apartment to Apartment Party Walling Alternative</b>	All avenues must be explored to meet the standards above, however the following are potential alternatives if the above cannot be achieved. To be agreed by DOCO. <ul style="list-style-type: none"> <li>• E-WT-2 Timber Wall</li> </ul>

		<ul style="list-style-type: none"> <li>• E-WS-3 Light Steel Wall</li> <li>• E-WM-20 Masonry Wall</li> </ul> <p>Installation of 9mm (min) timber sheathing or expanding metal in the areas concerned.</p> <p>Wherever possible C-Studs should have 300mm staggered centres.</p>	
<b>Public Realm &amp; Landscaping</b>			
<b>Permeability</b>		Routes for pedestrians, cyclists and vehicles must be open, direct and not unnecessarily separated from one another.	
		Footpaths should not run to the rear of, and or provide access to rear yards. If this is the case further mitigation will need to be discussed with the DOCO.	
<b>Communal Areas</b>		Communal areas such as playgrounds, seating or amenity areas should be designed to allow natural surveillance from the hub with safe routes for users to come and go.	
<b>Children Playground Areas</b>		<p>Due consideration to be given to child safeguarding including preventing dogs entering, abductions and children walking out unnoticed by guardian/s. Playgrounds should be:</p> <ul style="list-style-type: none"> <li>• Located to allow natural surveillance from nearby dwellings.</li> <li>• Clear signage stating age restrictions for specific areas and equipment (i.e. under 5's).</li> <li>• Ideally be fully enclosed with 1.2m open top railings or planting, to prevent casual users.</li> <li>• Should be a single dedicated entrance/exit point to enable parent/guardian supervision</li> <li>• Dedicated entrance/exit point to be gated with self-closer.</li> <li>• Ideally designed to be secured at night, if so boundary heights to be raised.</li> <li>• Vandal resistant equipment to be installed.</li> <li>• Historically playgrounds located at the rear of dwellings create ASB flashpoints and where possible should be avoided.</li> </ul>	

		<ul style="list-style-type: none"> <li>• Lighting needs to be a consideration. 24/7 lighting implies a suggestion of use out of hours (Site specific)</li> </ul>	
	<b>Landscaping Scheme</b>	A full landscaping scheme plan should be submitted and discussed with the DOCO.	
	<b>Sight lines</b>	Bushes and shrubs maximum 1m high.	
		Trees should a canopy height of 2m minimum and maintained to allow clear sight lines.	
		Landscaping and trees, should be designed to complement CCTV or lighting plans with long term maturity a consideration.	
	<b>Defensive Planting</b>	<p>Used to create distance from vulnerable areas such as pathways, neighbouring developments. The usage of defensive planting can complement perimeter boundaries.</p> <p>Defensive planting recommendations:</p> <ul style="list-style-type: none"> <li>• Plants with flowers for aesthetics and to deflect harsh appearance at the leading edge</li> <li>• To be mature planting from installation and reach a maximum height of 1m where sight lines need to maintained. Depth of planting will be site specific recommendations.</li> <li>• Positioned beneath windows and next to fences to deter potential offenders.</li> <li>• Require regular maintenance to prevent getting overgrown.</li> <li>• May require signage to warn of risk of injury (Occupiers Liability Act).</li> </ul>	
	<b>Sight lines</b>	Sight lines through the park and via the hub should be clear and well-marked to ensure that the user has a clear route with a destination at the end	
	<b>Park Fence Removal</b>	Fences are proposed for removal on the Ashley Road elevation of the park, whilst there are some reservations and objections over the removal of the fence line due to concerns for safety and the potential for ASB. There is evidence to suggest that this is a positive move to provide a more open and accessible space, in particular with women and girls who feel unsafe when there are limited exit points to aid escape when a park is fenced. Primarily the removal of the fence was to allow greater access	

from the school to discourage pinch points or entrances of conflict. The option of a more accessible elevation may reduce such conflict and crime.

Whilst this may be a positive attribute to the park, various steps must be considered to mitigate against the possibility of this becoming a crime generator, such as (not exhaustive list)

- Bollards or physical barriers to prevent vehicles from entering the park, spaced evenly across the edge
- Temporary rails or fencing to protect planting whilst it matures
- Consideration to return fencing if removal proves to be a crime generator

**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

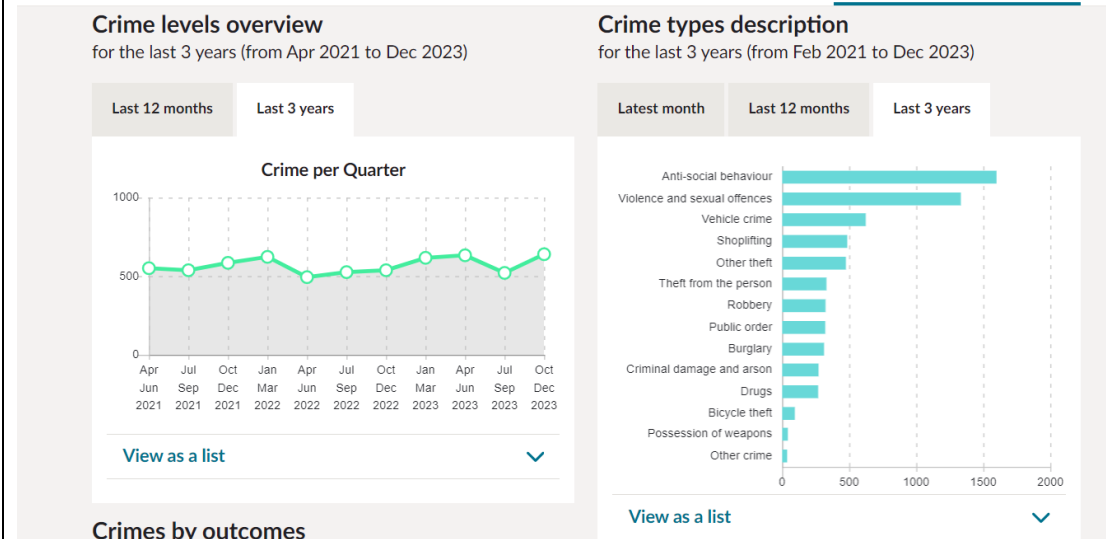
The crime figures provided below are publicly available on the Internet at <http://www.met.police.uk/>. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents 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 must also be noted that the area is 80,000m<sup>2</sup> of land located close to a main train station and such it is very difficult to get a true reflection of the crime figures

### 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.

	<p>Research by Ward, Thompson and Tseloni (2017) which was quoted in the victim commissioner's report on ASB in 2019 stated:</p> <p><b><i>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).</i></b></p> <p>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 3 times that reported of ASB per month.</p>	
<p>Living Under One Sun</p>	<p>LUOS is writing to express our support for the proposed new Community Hub Building and Gardens included within the current planning application for Down Lane Recreation Ground. Firstly, the application is recognition and an acknowledgement of the value of the current LUOS Community, Hub, Café and Gardens in Down Lane Park and all that has been achieved since 2018 and its importance for the park and the neighbourhood. Secondly, the trustees, and all involved with LUOS, have put on record our appreciation of the vision, forward thinking and positive decision the Council has taken to develop and fund (in difficult times) a new neighbourhood community hub building and gardens - creating a best practice neighbourhood model and delivering in partnership with the community As set out in the report to Committee, we note that National, Regional/London and Local Haringey planning policies support the development of new community facilities and infrastructure. LUOS has worked with the Council, members and officers and the design team, for over 18 months on the new Hub Building and Gardens, as well as other park improvements, and partnered the Council in its successful bid to the Mayor of London's Green and Resilient Spaces Fund for Down Lane Park. We are deeply engaged with delivering the outcomes of Green and Healthy Living skills and</p>	<p>Support is noted, the points raised are beyond the considerations of this application but will be passed to the applicant team for consideration.</p>

increasing positive connections and use of the park - with the community becoming real custodians of our neighbourhood green spaces. We also recommend that the conditions of approval must ensure: i) there is a seamless relationship and operation between the internal and external spaces, with a central control system for all key functions including lighting, electricity, water and security. 2 ii) there is sufficient sound proofing and electrical, lighting and water supplies to all areas of the garden outdoor space; at least two water points will be required and at least two electrical power points; iii) electricity supply must be able to cater for the café, hub building functions and outside events all happening at the same time; iv) boundary treatments must be fit for purpose and as safe and secure as possible to minimise the risk of anti-social behaviour: for example , the gabion boundary must be fine meshed to prevent weapons being hidden, the boundary with wooden sleepers must not present a fire safety risk; vi) the garden space has provision for the barn, stage, outdoor cooking area and oven, and green classroom/conservatory; LUOS strongly supports condition 23 (in Appendix 1 of the report) relating to an appropriate and costed Management and Maintenance Plan for the New Hub Building and Gardens which should be put in place as soon as possible – this is essential. Everything possible should be done at this stage to avoid later material amendments and/or further planning permission or other adjustments. LUOS has contributed significantly to the configuration and design of the Hub and Gardens and whilst there remain some detailed aspects of both the internal and external spaces to work through, these new high quality facilities will be a major contribution to creating ‘a happier, more inclusive, socially just, equal, empowered and greener neighbourhood’. In addition, LUOS would like to acknowledge the real concerns in the community about: a) the removal of the park railings, this requires further consideration; and b) the opening of the Berol Link into the park and the public health and safety risk on event days at the Tottenham Hotspur

	Stadium, when thousands of people will be coming through the park. The community feedback and recommendation to us is that this gate should closed on event days.	
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