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Exeter City Council

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Date: 04/12/18

Dear Mr Diamond,

19/1556/FUL The Harlequin Centre, Paul Street, Exeter, Devon EX4 3TT. Proposal Development of two blocks with 298 Co-Living bedspaces (sui-generis) and 114 bed hotel (Class C1) including bar and restaurant, following demolition of existing shopping centre and pedestrian bridge, change of use of upper floors of 21-22 Queen Street to Co-Living (sui-generis), and all associated works including parking, landscaping, amenity areas, public realm improvements, making good of the façade of the Guildhall and provision of heritage interpretation kiosk.

Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this application. Whilst I have no objection in relation to the application, I would like to make the following comments and recommendations, including the consideration of the planning conditions highlighted below.

The development is situated within policing area 'Beat DE2Y Exeter City Centre' which experiences the highest levels of crime and incidents within the Exeter Local Policing Area. Acquisitive crime, violent and drug offences are particularly high as well as levels of anti-social behaviour (ASB) including incidents of rowdy behaviour and concerns for public safety. Therefore the consideration of designing out crime and crime prevention through environmental design principles are vital in order to ensure that the potential for crime and ASB, as well as the fear of crime and ASB is minimised as much as possible. With that in mind it is pleasing that the architects have previously made contact with the Police Designing Out Crime Team to discuss the project at the pre-application stage.

Structure (Use)

A concern with the design of the development is the intended use of Block 1. I note from the DAS that the '*scheme was originally solely for Purpose Built Student Accommodation across the whole site*.' The intended use of Block 2 is not so much of a concern because the area designated for co-living and the area comprising of the hotel are somewhat separate and any conflict in use should be minimised.

In Block 1 the units will be for open residential use available to all however, the design of cluster rooms and studio flats with shared kitchen/amenity areas etc. appears to lend itself to the use of student accommodation. Should members of the student population be housed alongside non-students, there is the potential for disruption and safeguarding concerns. I note and welcome that the site will be professionally and carefully managed with 24-7 onsite support and that the suitability of prospective residents will be assessed. Such robust management will go some way to allaying concerns and it is vital that the management of the site is effective and constant. Therefore it is respectfully requesting that if planning permission is granted, the following condition is considered;

24-7 onsite management of the development is maintained indefinitely, as is the vetting of potential tenants.

Reason: In order to reduce the likelihood of crime, conflict, disorder and anti-social behaviour and to enhance the safety of both residents and non-residents of the scheme.

Physical Protection

Doorsets

The primary communal point of entry doorsets should be to one of the following standards which demonstrate the doorset is of a more robust construction and is able to withstand the day to day use in a communal application:

- STS 202 Issue 6:2015 Burglary Rating 2
- LPS 1175 Issue 7.2:2014 Security Rating 2+
- LPS 1175 Issue 8:2018 B3 Security Rating 2+
- LPS 2081 Issue 1.1:2016 Security Rating B
- PAS 24:2016, paragraph 4.4.3 i.e. tested to BS EN 1627 Resistance Class 3

In relation to the aspects of the scheme intended for residential use, a visitor door entry system with the following attributes should be installed:

- Allow a visitor to ring any selected dwelling within the particular system and/or building, and hold a two way conversation.
- Allow the occupant to see and identify the visitor and their location.
- Enable occupant of the dwelling to remotely operate the electric locking device from their room terminal, thereby allowing the visitor access.
- Ability to display the image of the caller before the call is answered so the resident can choose whether to answer the call or not.
- Visitor door entry systems that utilise CCTV should comply with the requirements set out in *Secured by Design Homes 2019* guidance.
- Colour monitors to assist the occupier with the identification of visitors.

The technology by which the access control system operates is outlined within UL 293 however, it should provide the following measures:

- Grants access to required areas via locked doors when the valid card or key fob is presented to a proximity reader fitted to the communal entrance doorset.
- Authorised access can be restricted to certain times of the day for some users.
- Access control system will have the facility to record and identify the location, user, type, time and date of every system event.
- Sufficient memory storage must be available for a period of not less than 30 days. The system will be fully programmable, able to expeditiously delete lost or stolen proximity cards or key fobs.
- Electronic keys must be security encrypted to protect against unauthorised copying.
- Be sufficiently robust to avoid constant replacement during everyday use by the residents.

Apartment blocks must not have trades button access for mail delivery or utility readings. They have been proven to contribute to ASB, crime and unlawful access to communal developments.

A ‘through-the-wall’ mail delivery into secure internal letterboxes, or boxes located within an ‘airlock’ access controlled entrance hall/lobby, whereby access can be gained by a postal worker through the outer door only, would negate casual intrusion.

Any external letterboxes should meet the requirements of the Door and Hardware Federation standard Technical Standard 009 (TS009).

If utility readings cannot be carried out remotely it would be preferable that they were located externally near the main entrance or in the 'airlock' space, thus again negating the need of a trades button.

Window sets – External (ground floor/accessible)
All such windows should be certificated and meet at least one of the following standards or equivalent:

- PAS 24:2016
- STS 204 Issue 6:2016
- LPS 1175 Issue 7.2:2014 Security Rating 1
- LPS 1175 Issue 8:2018 A1 Security Rating 1
- STS 202 Issue 7:2016 Burglary Rating 1
- LPS 2081 Issue 1.1:2016 Security Rating A.

This requirement is for 'easily accessible windows' as define by PART Q as:

- A window or doorset, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony, or
- A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30^0) that is within 3.5 metres of ground level

Any roof light apertures should be protected by roof lights certificated to LPS 1175 Security Rating 1 or STS 202 Burglary Resistance 1.

Bin & Cycle Stores
The doors to the integral bin and cycle stores should meet one of the following standards:

- PAS 24:2016 or
- STS 201 Issue 7:2015
- LPS 1175 Issue 7.2:2014 Security Rating 2+
- LPS 1175 Issue 8:2018 B3 Security Rating 2+
- STS 202 Issue 6:2015 Burglary Rating or
- LPS 2081 Issue 1.1:2016 Security Rating B

The locking system must be easily operable from the inner face by use of a thumb turn to ensure that residents are not accidentally locked in.

In relation to the external cycle hoops to the rear of Block 1, it is welcomed that this area is secured by way of gates as it lacks natural surveillance opportunities and would be in danger of becoming somewhat a 'void' area which could attract crime and anti-social behaviour.

The fencing and gates should be 1.8m minimum in height, preferably metal, adequately robust and secure, of anti-climb design and comply with any required fire regulations i.e. keyless egress etc.

Research by the 'Design against Crime Centre' suggests that cyclists should be encouraged to lock both wheels and the crossbar to a stand rather than just the crossbar and therefore a design of cycle stand that enables this method of locking to be used is recommended. Minimum requirements for such equipment are:

- Galvanised steel bar construction (minimum thickness 3mm)
- Minimum foundation depth of 300mm with welded 'anchor bar'.

Bin and cycle stores should be lit at night using vandal resistant light fittings and energy efficient LED lights. They should also be covered by adequate CCTV.

Access and Movement

The barrier controlled vehicular entrance is welcomed as it defines the area as semi-private space and helps to ensure legitimate use for residents and hotel guests.

The site has been designed as a pedestrian permeable site with designated access points via Paul Street and Maddocks Row. Pedestrian routes throughout the development must be clearly defined, wide, well overlooked, well-lit and supplemented with suitable way-finding signage. Planting immediately abutting such paths should generally be avoided as shrubs and trees have a tendency to grow over paths creating pinch points, places of concealment and unnecessary maintenance.

As stated in the Design and Access Statement, Maddocks Row is relatively narrow and poorly lit which gives some cause for concern. However, on a positive it is straight, relatively short and there is an opportunity to increase active and passive surveillance of the path. Additionally if the lighting to the both ends of the path and the path itself could be improved, it would make it a safer route for legitimate users and deter potential illegitimate use.

Block 1

It is vital that access to the residential parts of the development is restricted to residents and that casual intrusion is prevented. If communal areas, landings, stairwells, corridors etc. are compromised then they can attract ASB such as rough sleeping, drug use etc. particularly in a location within the city centre.

It is important that access to each floor is compartmentalised with security rated doors. This will hold potential attackers or burglars who may have tailgated through ground floor security measures so they cannot freely access the remainder of the block.

Block 2

I note that the '*car park will be secured with entry by card or keypad and will have both vehicular and pedestrian access'*. Under-croft parking areas can be prone to attracting crime and ASB if they are not adequately secured to prevent casual intrusion. Such areas are not overlooked and can provide a 'sheltered' space for illegitimate use such as rough sleeping, drug use etc. in particular. Unauthorised access to the car park must be prevented.

To assist please find the following Secured by Design guidance for underground and under-croft car parks:-

- An access control system must be applied to all vehicular and pedestrian entrances to prevent unauthorised access in to the carpark.
- Inward opening automatic gates or roller grilles must be located at the building line to avoid the creation of a recess. They must be capable of being operated remotely by the driver whilst sitting in the vehicle, the operation speed of the gates or shutters should be as quick as possible to avoid tail gating by other vehicles. This will allow easy access by a disabled driver, and should satisfy the requirements of the Highways Department who under normal circumstances do not permit vehicles to obstruct the pedestrian footway whilst the driver is unlocking a gate. Automatic roller

shutters should be certificated to a minimum of LPS 1175 SR1, STS 202 BR1 or LPS 2081 SRA
- Lighting must be at the levels recommended by BS 5489:2013.
- Walls and ceilings must have light colour finishes to maximise the effectiveness of the lighting as this will reduce the luminaires required to achieve an acceptable light level. Reflective paint can reduce the number of luminaires needed to achieve the desired lighting level and reduce long term running costs.
- Any internal door that gives access to the residential/hotel floors must have an access control system.

The principle of access control measures in order to prevent casual intrusion throughout the block and to ensure that access is restricted to residents as in Block 1, should also be applied to Block 2. Additionally, to avoid conflict in use between the hotel space and the 'co-living' space, suitable access control measures should be in place where there are doors adjoining the two spaces. I assume the hotel will employ internal access control systems to further floors.

I have no particular issues with the internal hotel design. The reception area should be afforded natural surveillance over the main entrance and formal surveillance (CCTV) of any other dedicated entrances.

Surveillance

On the whole informal surveillance on the development will be significant, particularly with the installation of an effective lighting scheme as risk of crime and ASB is greater during the hours of darkness. Surveillance should be promoted by the maintenance of a 2.5m surveillance gap from the highest form of planting to the lowest tree canopy throughout the site. Trees should have reduced canopy width and height verities to maximise CCTV coverage and reduce conflict with lighting.

Whilst footfall on site will be provide an increase in informal surveillance, design features such as the vehicular ramp, the colonnade, under-croft parking etc. obstruct clear lines of sight and hamper surveillance opportunities. Additionally, the Habitat Pocket Park will be afforded little surveillance which could leave it vulnerable to misuse. Therefore CCTV should be distributed throughout the development with clear Passport for Compliance Documents including Operational Requirements, in place. Access controlled areas, entry and exit points both vehicular (ANPR facility) and pedestrian, bike and bin stores, under-croft areas, walkways etc. are of particular importance. It would be beneficial if the onsite management/reception staff were able to actively monitor the CCTV onsite.

The following advice is given in respect of any CCTV installed:

- Cameras, wiring and recording or monitoring equipment should be secured. CCTV should be designed in co-ordination with external lighting and landscaping.
- The CCTV must have a recording format that is acceptable to the Police. Recorded images must be of evidential quality if intended for prosecution.
- Any CCTV is advised to be installed to BS EN 50132-7: CCTV surveillance systems for use in security applications.
- CCTV systems may have to be registered with the Information Commissioners Office (IOC) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available via www.ico.gov.uk
- For guidance on the use of CCTV images as legal evidence see also BS 7958:2005 CCTV Management and Operation Code of Practice.
- Accredited NSI or SSAIB installers must be used.

It is respectfully requesting that if planning permission is granted, the following condition is considered;

CCTV is distributed throughout the development.
Reason: In order to help prevent/detect crime, disorder and anti-social behaviour.

Lighting
An effective lighting scheme affects 6 out of the 7 Crime Prevention Through Environmental Design principles[1].

Lighting should be installed to the relevant levels as defined in BS 5489:2013. It is important that the landscape architect and lighting engineer coordinate their plans to avoid conflict between lighting and tree canopies.

For crime prevention measures, lighting should be provided by on building solutions or preferably pole mounted luminaires if possible. Bollard lighting should be minimised and used for demarcation of routes only or supplementary as part of a general design.

24 hour internal lighting (switched using a photoelectric cell) to communal parts of the development should be installed. This includes the communal entrance halls, landings, corridors, stairwells and all entrance/exit points. Consider lighting systems that reduce light levels during quieter periods to save energy.

Management and Maintenance

As referenced above, the effective and robust management of the scheme is vital in creating a safe, secure environment and reducing the likelihood of crime and ASB at the development. Such management and maintenance must be secured indefinitely.

Ownership

Defensive planting should be utilised wherever possible to provide additional protection around the ground floor windows of the scheme. Planting should be dense ground covering plants and maintained at a maximum height of 1m with a depth of at least 1m.

Yours sincerely

Kris Calderhead
Designing Out Crime Officer

Note RE doorsets: *"Secured by Design does not hold evidence of independent third party certification for this product in relation to its Fire Performance. We strongly advise that such evidence is obtained from the manufacturer to ensure its suitability to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire."*

[1] Safer Places – The Planning System and Crime Prevention