



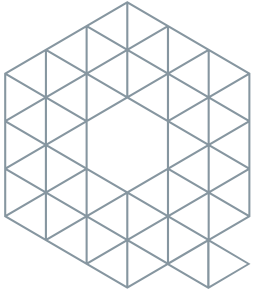
EUSTON TOWER

Crime Impact Assessment
Addendum

December 2024



CAPE TOWN / HONG KONG / LONDON / NEW YORK



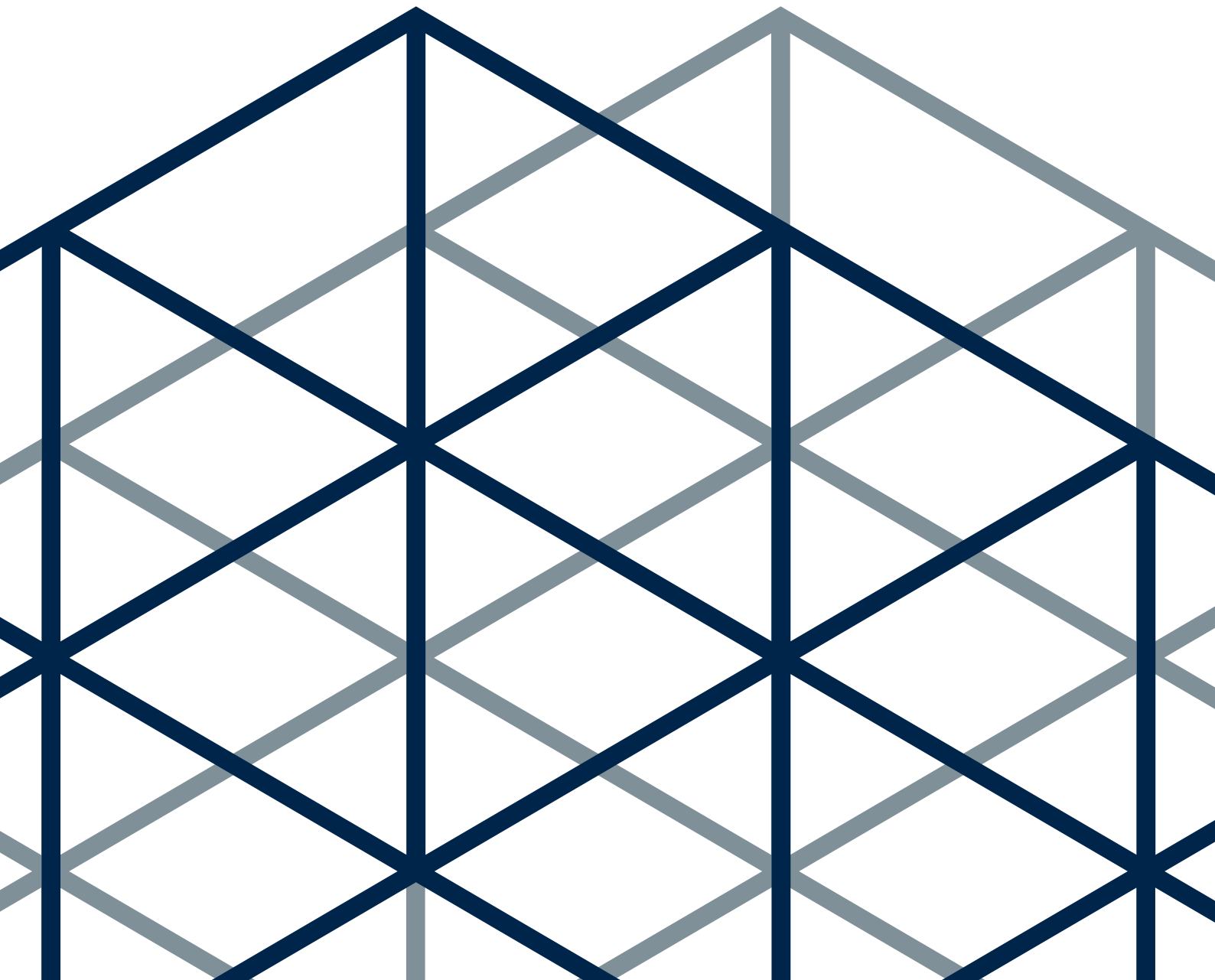
QCIC

SECURITY ASSURED

British Land Euston Tower

Crime Impact Assessment

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25-OCT-24



Document issue / revision record

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C	Planning Issue	17-NOV-23	MB	EU	MR
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G	Updated crime statistics and added executive summary. Previous appendix A remove to avoid duplication	29-NOV-24	KM	PB	MR
H	Updated following comments	04-DEC-24	KM	PB	MR
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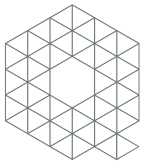
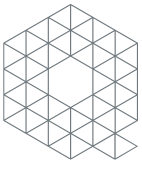
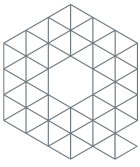


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1.0 Executive Summary

1.1 Introduction

This Crime Impact Assessment Addendum summarises the revisions made to the pending strategic application for Full Planning Permission (ref. 23/5240/P), submitted in December 2023 for the Proposed Development at Euston Tower (286 Euston Road, London).

The Applicant has undertaken extensive consultation during both the pre-application and determination stages of the Proposed Development and has sought to respond positively to the responses received. The scheme has been revised in response to feedback from Officers, local stakeholders and residents, the Regents Park Conservation Area Advisory Committee and statutory consultees, including Historic England and The Greater London Authority.

This Addendum has been prepared detailing the revisions to the pending scheme (the “Proposed Development”). For the avoidance of doubt, the Crime Impact Assessment which accompanied the December 2023 Submission is considered as read and this Addendum deals only with the 2024 Revisions and any updates to assessments as a result of these revisions. This Addendum also clarifies and provides further details responding to consultation responses received since the original submission in December 2023. Save where varied or supplemented in this Addendum, the content of the Crime Impact Assessment remains valid and up to date.

1.2 Threat identification

Crime statistics and terrorist threat information has been updated to reflect 2024 data. Crime statistics within the wider policing area indicate the most common types of reported crime are:

- ▶ theft from the person
- ▶ all other crime
- ▶ shoplifting
- ▶ violence and sexual offences
- ▶ anti-social behaviour

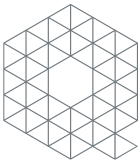
Terrorist-related threats against the facility have been identified as:

- ▶ Vehicle borne improvised explosive device (VBIED) attacks
- ▶ Vehicle as a weapon (VAW) attacks
- ▶ Marauding terrorist attacks (MTA)

1.3 Security strategy

The proposed security strategy remains the same as the 2023 issue, the key recommendation of which are:

- ▶ A security control room
- ▶ Electronic security systems, including access control and video surveillance
- ▶ Physical security, including building architectural considerations, internal protective lines and hostile vehicle mitigation
- ▶ Operational measures, including standard security operations, emergency operations and communication



2.0 Crime Impact Assessment

2.1 Introduction

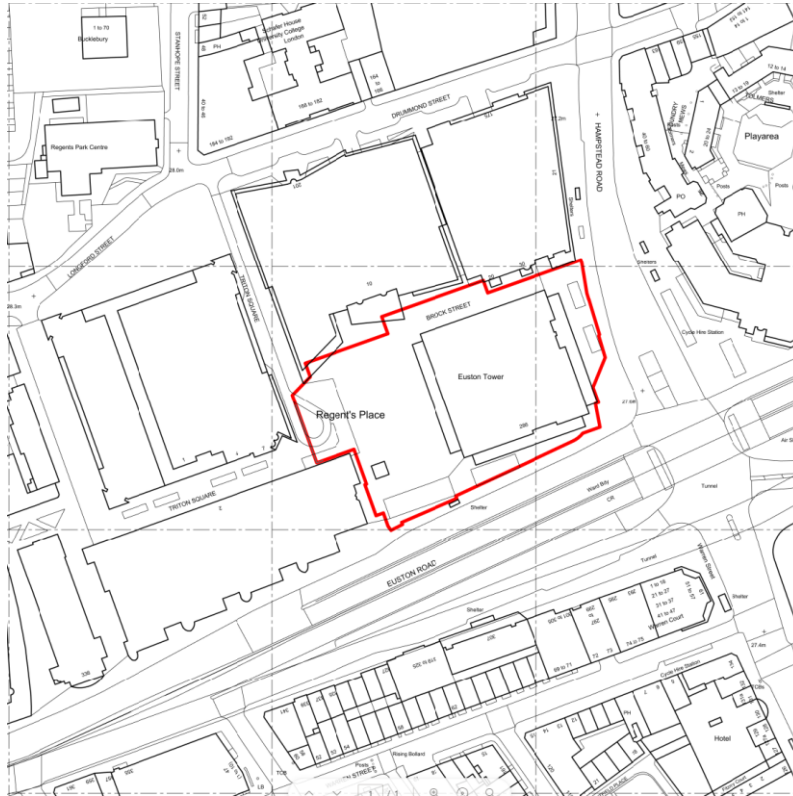
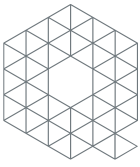


Figure 1: Red line of the planning application for the Euston Tower Scheme (Source: ET_DR_A_10002)

Euston Tower is situated within the London Borough of Camden ('LBC'), and the ward of Regent's Park. The Site is bounded by Euston Road (south), Hampstead Road (east), Brock Street (north) and Regent's Place (west). The Site covers an area of 8,079sqm, comprised of an existing single, ground plus 36-storey tower. The existing tower, which has been largely vacant for several years, predominantly comprises office uses on the upper floors, with retail uses in operation at ground floor level. The Site does not fall within a conservation area; the Fitzroy Square CA and Bloomsbury CA are both located in close proximity (south). There are no elements of the Site that are statutory or locally listed. A Certificate of Immunity from listing has been submitted and granted. There are several buildings located within a close radius of the Site that are Grade I, Grade II and Grade II* listed. The Site has a PTAL rating of 6b indicating 'excellent' transport connectivity. The Site is mainly served by Warren Street Underground Station (south), Euston Square Underground Station (east) and Great Portland Street Underground Station (west). There are also several bus routes that serve the site along Euston Road (south) and Hampstead Road (east).

The land surrounding the Site consists of a range of uses. The Site is part of British Land's Regent's Place campus, designated within the Knowledge Quarter Innovation District ('KQID'), home to world-class clusters of scientific and knowledge-based institutions and companies specialising in life-sciences, data and technology and creative industries. Regent's Place comprises commercial, office, residential, cultural and community land uses, as well as pedestrianised streets and public realm incorporated into the space. The closest residential properties are located along Drummond Street (north) and Hampstead Road (east).

Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey



building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and enterprise space (Class E/F) at ground and first floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works.

The Security Strategy as set out in this crime impact assessment for the development of Euston Tower and the surrounding public realm of Regents Plaza, has been developed and coordinated with the professional team and QCIC Group serving as a Suitably Qualified Security Specialist (SQSS) as recognised by the Building Research Establishment Environment Assessment Methodology (BREEAM) criteria.

This crime impact assessment outlines strategies that require the architectural design to be developed alongside specific physical, electronic and operational security measures. The development of the designs will take place alongside ongoing stakeholder engagement to ensure the risks are suitably managed and within risk tolerance levels of these different parties. The entire design team collaborate and coordinate to ensure that the overarching crime prevention strategies are underpinned throughout the proposals for the Euston Tower scheme.

As part of developing the security design strategy for the project, a meeting has been conducted with the Camden Designing out Crime Officer (DOCO) on the 25th of October 2023 this meeting was to corroborate the proposed security design strategy outlined below. As the recommendations have not changed, there has been no need to have a follow-up meeting with the DOCO.

2.2 Proposed security strategy summary

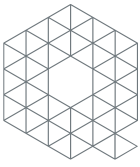
The proposed Euston Tower and Regents Plaza security design strategy will incorporate the following where appropriate, with specific attention to the mitigation of the security risks highlighted in this report:

2.2.1 Electronic security systems

- ▶ Electronic access control linked to an on-site control room. Managed 24/7 and including the ability to dynamically lockdown parts of the development should the requirement arise. This will include back of house, core and all critical asset areas
- ▶ Video Surveillance System linked to an on-site control room. Cameras will be distributed throughout the interior for observation and identification at critical access points. There will also be overview of the immediate public realm space
- ▶ Communications systems such as intercoms for building users to communicate with the control room or to key points within the development. These will be located at all points identified to provide out of hours access if necessary
- ▶ Appropriate lighting levels to support surveillance (natural and active)
- ▶ Electronic security will be monitored from several key positions using an enterprise Security Management System (SMS), underpinned by robust operational security practice, supported and operated by a team of security professionals

2.2.2 Physical security

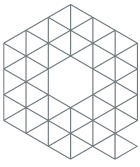
- ▶ Building regulations Approved document Q requirements for security measures
- ▶ Measures to mitigate anti-social behaviour are designed into the building architecture such as the minimising of blind spots, with the support of electronic security systems such as video surveillance. This is also coordinated with the landscape design for the public realm areas for the wider scheme, such as the use of natural surveillance, and clear and unobstructed sightlines where possible. This can help to lower security risk by the promotion of visibility around the scheme
- ▶ Internal security lines will be in place at core areas, with the inclusion of security turnstiles these will be supported by electronic security access control and video surveillance



- ▶ Access points rated to appropriate physical attack standards i.e. PAS24: 2022
- ▶ Hostile Vehicle Mitigation encircling the scheme to protect both the main building and the public realm comprising the development from vehicle borne threats. Protection will be PAS 68: 2013 rated and take the form of mixed furniture such as bollards and planters
- ▶ Integration of the Euston Tower scheme into the wider British Land physical security for Triton Square and Regents Plaza for effective protection and efficient management of access

2.2.3 Operational management (infrastructure)

- ▶ A Security Control Room designed and equipped to accommodate the proposed equipment and operators to meet the operational needs of the site.
- ▶ Robust security procedures and practices to facilitate the effective monitoring and managing of normal and incident operation management
- ▶ Communication and coordination with the wider British Land security teams for effective operational management of the Regents Plaza and Triton Square area



3.0 Security threats

3.1 Threats to the development

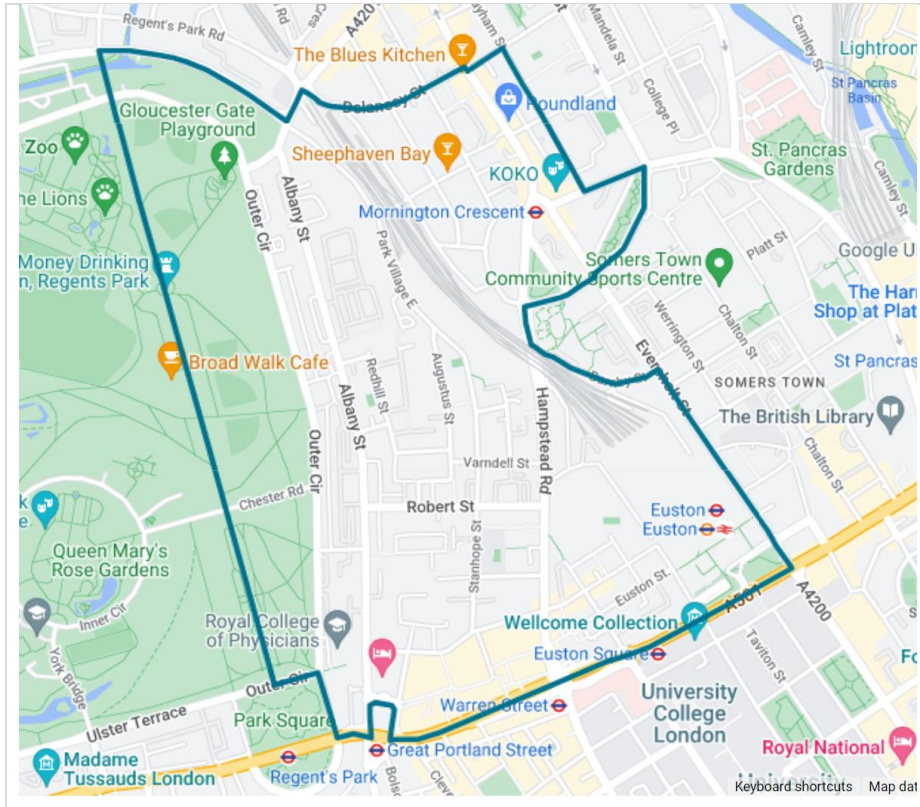
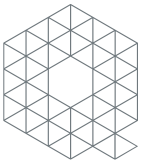


Figure 2: Selected crime map of the immediate area (Source: Police.UK)

The following local area crime charts displaying annual and monthly crimes show realistic crime rates, QCIC have used existing crime statistics for the Regent's Park area to determine the types of crimes most likely to affect the Euston Tower development.



3.1.1 Crime levels

The latest annual crime data for the preceding year does reflect a normal level of crime, with crime rates returning to normal levels after the UK government restriction relating to the Covid-19 pandemic.

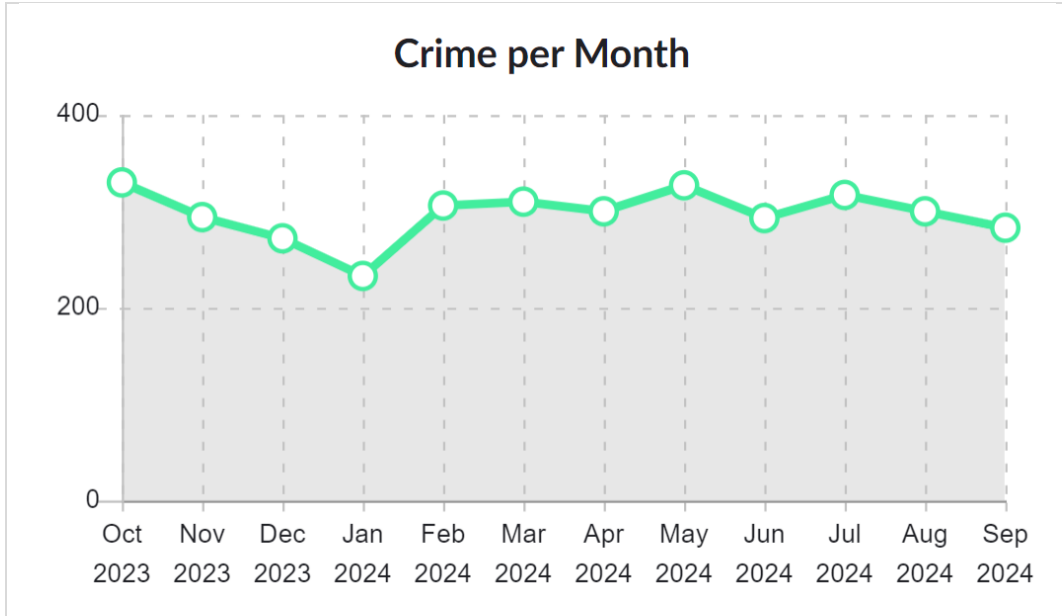


Figure 3: Crime within the mapped area Oct 2023 to Sep 2024 (Source: Police.UK)

Monthly crime rates peaked in October 2023 at 330.

The three-year quarterly crime rates indicated below peak at 1854 reported crimes over April and June 2023. From the crime statistics, it is assessed that the volume of pedestrians is proportional to the number of crimes committed, with many crimes committed in areas where there is a higher level of population density.

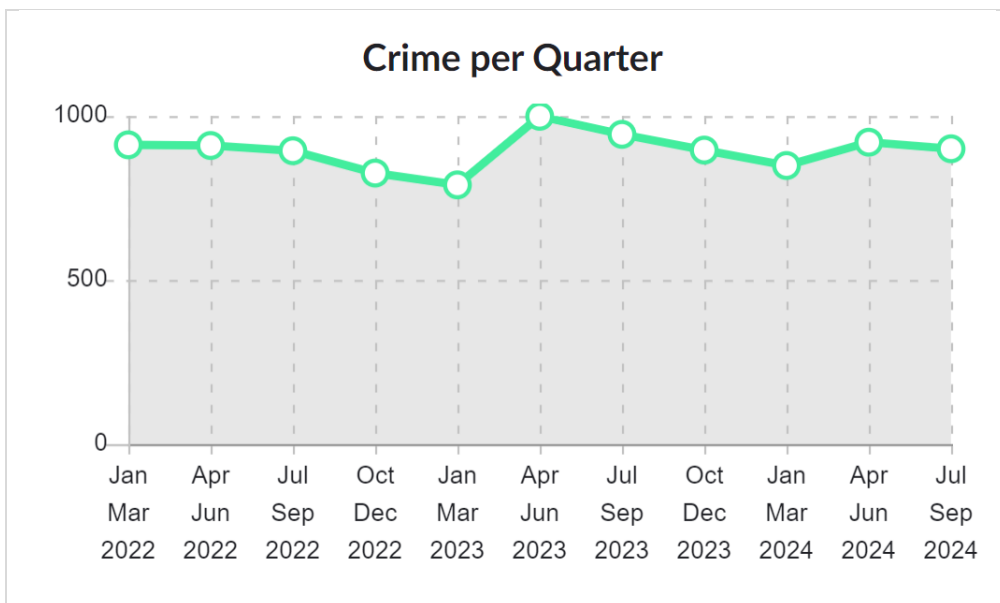


Figure 4: Crime within the mapped area Jan 2022 to Sep 2023 (Source: Police.UK)

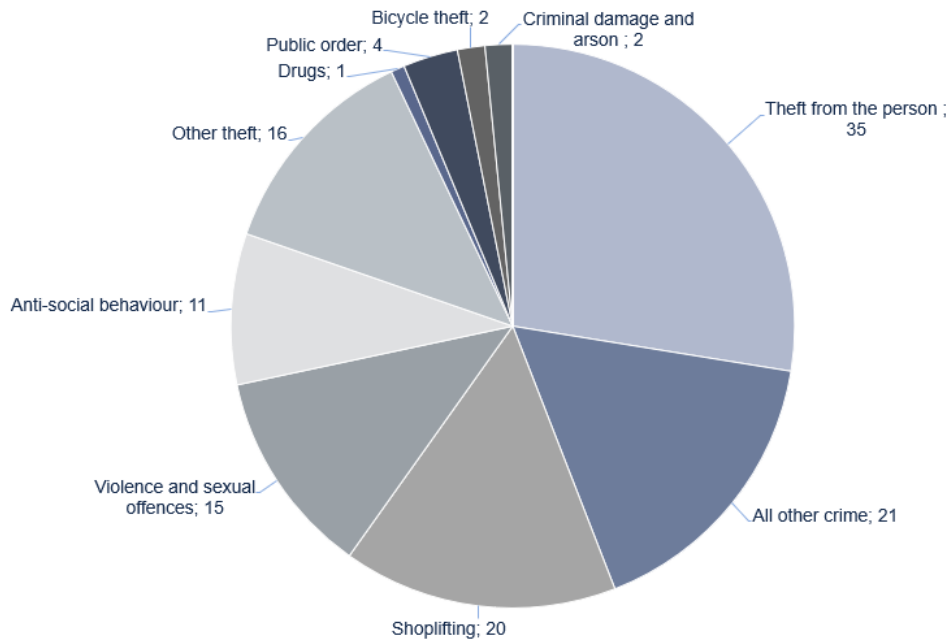
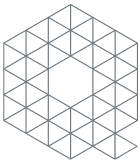
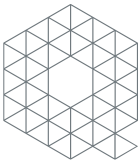


Figure 5: Reported crime rates in the immediate vicinity of the building, Apr to Aug 2024 (Source: Police.UK)

In analysing the crime reported over the past six months in the immediate vicinity of the scheme, the most common crimes reported are theft from the person, all other crime, and shoplifting. Other prevalent issues include violence and sexual offences, anti-social behaviour, and other theft, while less common crime types involve drugs, public order, criminal damage and arson, and bicycle theft.



3.1.2 Crime type variations

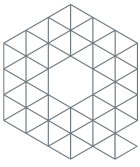
Type	Total	Percentage
Anti-social behaviour	2316	22.1%
Violence and sexual offences	1918	18.3%
Theft from the person	1714	16.3%
Other theft	1503	14.3%
Public order	672	6.4%
Vehicle crime	444	4.2%
Drugs	390	3.7%
Criminal damage and arson	381	3.6%
Robbery	333	3.2%
Burglary	281	2.7%
Shoplifting	228	2.2%
Bicycle theft	179	1.7%
Possession of weapons	60	0.6%
Other crime	66	0.6%

Figure 6: List of crime by type in the Regent's Park 3 years prior to September 2024 (Source: Police.UK)

Based on the data shown in the 3-year quarterly crime stats, QCIC has assessed that Anti-social Behaviour (22.1%) as well as Violence and sexual offenses (18.3%) may be directed towards the development and its occupants. They are the most prevalent offences as well as the potential for Theft from the person (16.3%) and Other theft (14.3%).

The likelihood of Public Order and Terrorism affecting the development, although credible, is regarded as Medium. This is mainly driven by the Euston Tower's proximity to crowded places like Regent's Plaza adjacent to the building or the New Diorama Theatre about 170m west. Increased risk can also occur by potential tenants, occupants and work conducted within the building, appropriate risk assessment should be carried out to evaluate how these variables will affect the risk to the scheme during selection or approval of these occupants and activities. Examples are the perceived social reputation of a specific tenant or the area that they are involved in such as controversial environmental practice or biological research etc.

However, when estimating the probability of crime in the immediate area of the development using the recorded crime data is unlikely to give a full and accurate representation of the crime issues present. This is due to the following influences:



- ▶ The lack of detailed information available for individual crime events.
- ▶ The ways in which crimes are recorded as well as issues relating to non-reporting of crime.

As such, the statistical crime data may not be suitable for evaluating the longer-term risk of crime effectively but can be used to identify the recent locations and types of crime currently being committed.

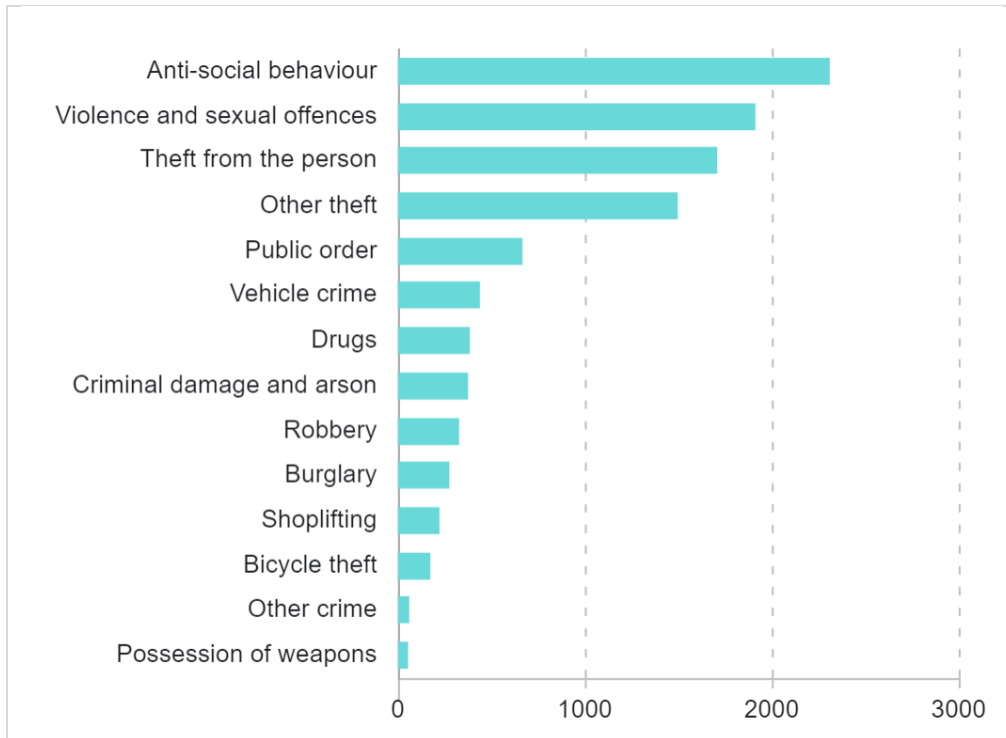


Figure 7: Crime by type in the Regent's Park 3 years prior to September 2024 (Source: Police.UK)

Statistics shown in figure 7 Crime by type for the 3 years prior to September 2024 are elaborated in the following crime type descriptions:

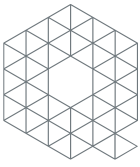
3.1.3 Anti-social behaviour

Anti-social behaviour refers to actions that cause harassment, alarm, or distress to individuals or communities, undermining social harmony and public safety. This can encompass a wide range of behaviours, including rowdy or inconsiderate behaviour, littering, fly posting, street drinking, begging and rough sleeping. Anti-social behaviour often creates an atmosphere of fear and discomfort, leading to a diminished quality of life for residents and fostering tensions within communities.

3.1.4 Violence & sexual offences

Violent crime potentially poses a threat to the occupants of Euston Tower. This crime category is broad Sexual offences are a category of crimes that involve non-consensual sexual acts or behaviours, including rape, sexual assault, and harassment. These offences can occur in various contexts, affecting individuals regardless of age, gender, or background. The impact of sexual offences is profound, often resulting in severe emotional and psychological trauma for victims, as well as societal repercussions such as heightened fear and mistrust.

Reducing areas of low light or obscured visibility combined with a visible security presence (mechanical, electronic, and human) will help reduce the likelihood of some offences from taking place within or in the vicinity of the building. Good lighting in particular will help promote a safe and secure environment. The schemes design incorporates these good practices, and further information can be found in the



lighting and landscape assessments, conducted by other members of the Design team and coordinated with the SQSS. Where secluded spaces cannot be avoided (such as cycle storage areas) means of raising an alarm via duress buttons or panic alarms will also be utilised in the security strategy for the scheme.

3.1.5 Other theft & theft from person

Theft is a criminal act that involves the unlawful taking of someone else's property with the intent to permanently deprive the owner of it. Theft can have significant emotional and financial impacts on victims, causing not only loss of property but also feelings of violation and insecurity.

There is a higher risk of other theft and theft from persons affecting the occupants of Euston Tower potentially accentuated by the high numbers of people transiting between the local stations as well as the areas of high footfall for example the National Rail Euston Station. The increase of natural surveillance – visibility to members of the public – and supporting security strategy proposed in the scheme will aid in the reduction of the likelihood of this type of crime.

3.1.6 Public order

The immediate area surrounding Euston Tower does not have a history of disruption caused by large scale public protest, looting, or public order offences, manifesting in protest, mob attacks or vandalism. However, Regent's Park is situated in a capital city and this means that the potential threat of public order is present. Demonstrations frequently occur within London over issues such as industrial relations, gentrification, human rights and environment protection. The majority of these are peaceful protests, although disturbances and arrests have occurred during recent protests in London. The risk of such disruption directly affecting the development will be potentially driven by future tenant(s) reputational factors as well as work conducted within the building e.g. research or practice in laboratory/ life sciences areas. QCIC recommends that subsequent security risk assessments are conducted once the future tenant(s) have been confirmed for the building.

3.1.7 Shoplifting

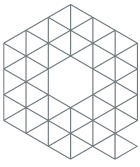
Removing goods with the intention of not paying is a common and often orchestrated criminal behaviour featuring a wide range of styles and approaches dependent upon the target merchandise. The Regent's Park retail sector has multiple levels of outlet and mitigations vary. Displaying goods and allowing people to browse amongst the merchandise opens the retailer to distraction crimes by organised groups. Individuals asking for items that will require the assistant to move away is another distraction tactic. Shoplifters will equip themselves with a range of bags that screen tags from detection, to carrying tools allowing them to remove tags with being seen. They also carry large bags or wear oversized clothing to conceal stolen goods.

3.1.8 Drugs

Drug related crime can range from possession of a class A drug to dealing and distribution. These may be from random searches or a starting point of anti-social behaviour leading to a drug discovery. Prevalent in high traffic areas and quieter spots in quieter periods. The increase of natural surveillance and supporting security strategy proposed in the scheme will aid in the reduction of the likelihood of this type of crime.

3.1.9 Vehicle crime

Includes theft from or of a vehicle or interference with a vehicle. Vehicle crime is not a completely preventable crime without a well-managed secure parking scheme. The ability to control pedestrian access will directly impact this issue. However, such crimes do occur in areas that are more secluded.



There is significant open parking on roads nearby such as Drummond Street North of the site as well as multiple cycle parking around the building perimeter. The potential for vehicle crime is credible. Good lighting and barrier controls that provide natural surveillance support a reduction in such crimes. The scheme also has its own secure parking providing a limited number of blue badge spaces and a large number of cycles. This reduces the likelihood of this type of crime for those with access to it and promotes the use of these facilities for occupants and tenants.

3.1.10 Criminal damage & arson

This offence is wide ranging and applies to any tangible property and is the intentional and malicious damage to property or vehicles. It also includes the offence of Arson, which is criminal damage using fire to cause the damage. For damage to be inflicted on a property however, it must be more than minimal and create a situation where the property's value or usefulness has been affected in some way. Arson is the crime of intentionally and maliciously setting fire to buildings, wildland areas, vehicles, or other property with the intent to cause damage. Many arson attacks target waste containers and other combustible objects located outside buildings. These relatively innocuous fires often develop into fires which can cause significant personal injuries or property damage when they spread into buildings. The schemes specific waste management process will be securely managed within the demise of the building reducing the likelihood of this as a point of attack for arson.

3.1.11 Robbery

Theft with the use of force or a threat of force. Both personal and commercial robbery are included. Snatch theft is not included. Retail and financial businesses where there is an overt attack which meets the criteria stated above. Street theft from a person where violence or force is used to intimidate the victim. The increase of natural surveillance and supporting security strategy proposed in the scheme will aid in the reduction of the likelihood of this type of crime.

3.2 Terrorism

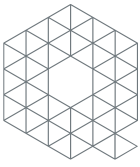
Current terrorist attacks tend to target crowded areas, and it is assessed that an attack on an adjacent crowded place such as Regent's Plaza, Santander Bank or the New Diorama Theatre, may have a direct and subsequent effect on the Euston Tower building.

Collateral damage caused by an indirect Vehicle-Borne Improvised Explosive Device (VBIED) or Person-Borne Improvised Explosive Device (PBIED) attack on an adjacent more attractive target, may create injury from flying glass which, if left untreated would form an identifiable risk to the building's occupants. Consideration of this risk has been given and the scheme has been designed to mitigate the effects both architecturally and with the inclusion of Hostile Vehicle Mitigation line around the building and public realm.

As with public order offences, the threat of terrorism directly affecting the development will be potentially driven by future tenant(s) reputational factors as well as work conducted within the building e.g. research or practice in laboratory/ life sciences areas. QCIC recommends that subsequent security risk assessments are conducted once the future tenant(s) have been confirmed for the building.

3.2.1 Vehicle as a weapon

The current use of vehicles as a weapon cannot be ignored, if any exterior areas at road level are potentially being used for gatherings exceeding 20 or more people. The attacking vehicle is often a rental or may be stolen. Pedestrianised zones will require a service vehicle or emergency access system. The Euston Tower scheme has considered the protection against this risk with the inclusion of Hostile Vehicle Mitigation line around the building and public realm.



3.2.2 Marauding terrorist attacks (MTA)

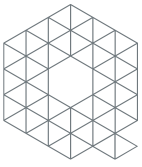
The present profile of attacks by single person or coordinated attacks on single issue matters or with a terrorism motivation, requires businesses to consider how they might manage the threat of a MFAWA incident. Mitigating such random events or managing a situation known to be approaching the property. The Euston Tower scheme has considered the protection against this risk with the provision of Dynamic Lockdown to be included as a part of the building perimeter, this allows the building security professionals to manage a security incident. Denying access to aggressors where necessary and routing victims to safety through other routes of egress.

3.2.3 Fire as a Weapon (FAW)

This is the use of arson beyond causing property damage where the perpetrator is unlikely to confront the occupier of the building, it is unlikely to be reported under Criminal Damage and Arson crime data. FAW is likely to be employed in one or more of the following ways:

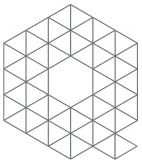
- ▶ Used as a distraction tactic which will draw the attention or response of security officers, which may allow vulnerabilities to be exploited, e.g., attackers may enter a building while security officers are focused on the fire.
- ▶ Augment other attack method(s) (bladed weapons, firearms etc) and so cause injury or damage to property, through the use of accelerants e.g., petrol bombs (aka Molotov cocktails) or other incendiary methods.
- ▶ Trigger a fire evacuation which might cause people to become vulnerable to an attack.
- ▶ Causing disruption or delay with the intent of preventing or restricting emergency responders confronting the attackers, carrying out lifesaving operations and extinguishing the fire.

The increase of natural surveillance and the supporting security strategy proposed in the scheme will aid in the reduction of the likelihood of this type of crime.



4.0 Conclusion

Based on the threats identified in this assessment and taking into account guidance in the Camden Local Plan policies C5 and D1. QCIC as the SQSS for the Euston Tower and Regents Plaza scheme, determine that the proposed security strategy of electronic, physical and operational security, sufficiently address the impact of crime therein. With the use of this strategy, the mitigation noted alongside the threat analysis and the continuation of design team and regulatory coordination throughout the design and construction stages, the risk of the crimes identified will be lowered as a result within the scheme.

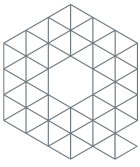


5.0 Appendix A – Police / CTSA Consultation

5.1 Police consultation

The SQSS has held a meeting with the DOCO and the Client Design team on the 25th October @ 1200 where the scheme was presented.

Under the BREEAM knowledge base guidance for HEA'06, the SQSS has used reported crime information and statistic information provided by the Police.UK website to establish recent and historic local crime data and spread over a range of reported crime types.



6.0 Appendix B – Review dated 25 October 2024

This Appendix C has been added to the document to summarise a review undertaken by QCIC of the Crime Impact Assessment in light of the changes in floorplan of the building design. No other changes have been made to the rest of the document, which remains as per revision E.

Objective

The objective of this review is to assess whether the security mitigation measures in section 1.2 of this document remains appropriate in light of the changes in building floorplans since the last issue date of this report.

Outcome

QCIC has reviewed the floorplans and assessed the current crime-related threats and terrorist threats that the facilities may be exposed to.

Whilst both the crime and terrorist threats have evolved to some extent, it is concluded that the security measures proposed continue to be applicable to the new design.

No amendment to this Crime Impact Assessment is therefore proposed.



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