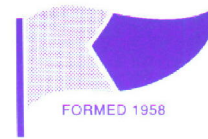


Commodore Tony Hay

Hon. Secretary Tom Rowland



St. Pancras Cruising Club

St. Pancras Yacht Basin,
Camley Street,
London NW1 0PL
Telephone: 020 7278 2805

24 February 2016

Josleen Chug
Planning Solutions Team
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

Dear Josleen Chug,

The Town & Country Planning Act 1990 (as amended)

Application No: 2016/0289/C

Proposal: Details of works to the Regent's Canal walls associated with the formation of Camley Bridge, etc.

Location: Camley Bridge, Camley Street and Wharf Road Viaduct London N1C

Thank you for your consultation dated 27 January 2016 in respect of the above.

St. Pancras Cruising Club is a members' club that occupies St Pancras Yacht Basin, Camley Street, London N1C. St Pancras Yacht Basin is located adjacent to Camley Street Natural Park (CSNP) which will be crossed by the proposed Camley Bridge. The proposed bridge will pass within 1 metre of the southern boundary of our grounds at St. Pancras Yacht Basin.

The Club is an unincorporated association which exists, inter alia, to encourage the use of private pleasure vessels for cruising on the Regent's Canal and other waterways, to provide facilities and activities for its members, and to act as a negotiating body between its members and other organisations. The Management Committee of St Pancras Cruising Club is responsible for managing the affairs of the Club.

The Management Committee has noted the formal Planning Application for approval of Reserved Matters relating to the Camley Bridge. We do not object to the design of the bridge structure which appears an attractive solution to modern canal bridge construction. However we do have concerns relating to the increased public visibility of our grounds and the need for suitable security measures to be implemented. We have expressed these concerns during pre-application discussions with the developer but we do not believe that they have been adequately addressed in the planning application.

Visibility

The Club's car park, which occupies the area adjacent to CSNP and the proposed bridge, is mostly concealed from public view apart from a small area visible from Camley Street. The Management Committee is concerned that the cars, bicycles, motor cycles and gas bottle cages in the car park, which are currently out of sight, will be more vulnerable to theft and damage once the ramp to the bridge is constructed. We believe that the

Affiliated to:- IWA, A.W.C.C., A.T.Y.C., A.L.C.C.

proposed erection of a chain link fence on our boundary will have not reduce the visibility of the car park from the ramp.

We ask the Council to demand that a visually impermeable fence be erected along our boundary to prevent such viewing of our private storage areas.

Security

St Pancras Yacht Basin is currently secured by locked gates (to Camley Street and to the canal towpath), by the railway viaduct, by the canal, and by the fences that separate the Basin from CSNP. The boundary between the Club's car park and CSNP is secured by our 2.4 m palisade fence, but there is an indirect access route from CSNP to the Basin through the mooring area adjacent to St Pancras lock.

The CSNP boundary to this mooring area is currently secured by a 1.4 m post and rail fence, which combined with the planting beyond has not historically been a significant security problem. However the planning application includes the total clearance of the current planting and the removal of the soil mounding, which is likely to make this indirect access route both more visible and easier to negotiate.

We would ask the Council to demand that a secure metal fence 1.8 m high be erected between the existing metal post fence across the mooring area to the south and the palisade fence below the Lock Cottage to the north to replace the inadequate 1.4 m post and rail fence.

Attachments

In consultation with Club members we have prepared a report and marked up drawings which highlight areas of the submission which appear inconsistent with the developer's intention of maintaining or improving the security. Copies of that report and drawings are appended.

Yours faithfully,



Anthony Hay

Commodore of St Pancras Cruising Club

on behalf of the Management Committee of St Pancras Cruising Club

Comments and concerns

Camley Bridge
Reserved Matters Submission

St. Pancras Cruising Club

February 2016

Submission from St Pancras Cruising Club relating to Application No: 2016/0289/C: "Details of works to the Regent's Canal walls associated with the formation of Camley Bridge, etc."

Summary

St Pancras Cruising Club requests that Camden Council demands the following actions from the applicant before considering the application;

- 1) that security aspects of the submitted design be reconsidered and enhanced from that currently proposed,
- 2) that the boundary treatments of the submitted design be reconsidered and enhanced from that currently proposed,
- 3) that the soft landscaping proposals of the submitted design be reconsidered and enhanced from that currently shown.
- 4) that a condition be placed on any consent granted requiring that arrangements for appropriate levels of maintenance for the boundary fence be put in place in perpetuity.

The Club makes the following specific requests relating to security aspects and boundary treatments:

- 1) that the Council demands that a secure metal fence 1.8 m high be erected between the existing metal post fence across the mooring area to the south and the palisade fence below the Lock Cottage to the north to replace the inadequate 1.4 m post and rail fence, and
- 2) that the Council demands that a visually impermeable fence be erected along our boundary to prevent such viewing of our private storage areas.

The following sections refer to the Submission statement dated January 2016 by King's Cross Central General Partner Ltd, and to the Drawing package dated January 2016 by Moxon Architects. Mark-up copies of these drawings are presented in a separate document.

SECURITY ASPECTS

Condition 16 of the Submission statement refers to security aspects. [Pages 20, 32 & 40]. Images on these pages show the existing low insecure fence retained between the CSNP and the canal mooring quay, the second and third images show the current 1.8 m iron post fence that returns across the path removed. That on p. 40 clearly illustrates the opportunity to gain access from the bridge into CSNP and then the route east across the open area, through or over the low two bar fence, along the canal bank under the bridge, then up the steps to the lock and thence to the Lock Cottage and SPCC grounds.

This path is illustrated in red ink on the first and second marked up plans that are appended to this document.

It is understood that the iron post fence is likely to be retained but this does not assist in the security of the Lock Cottage or SPCC grounds without a link along the canal path under the bridge to the 1.8 m palisade fence adjacent to the Lock Cottage.

Condition 16: UDR [Page 33 of Submission].

Safety and Security

Due to increased traffic envisaged across the submission site, thought has been put into the safety and security of not only those using the proposed bridge, but also those occupying the LWT and St. Pancras Cruising Club ('SPCC').

In discussions with the SPCC and the LWT, it became clear that their primary concern was to prevent direct access from the bridge or ramp into either of their property.

It is proposed to strengthen the boundaries between both occupiers, and also between the CSNP and Camley Street by the SPCC entrance gates, and where the ramp ends. This will be implemented by replacement fencing and 'defensive' planting to either side of the approach ramp as it passes through CSNP, as described in Section 2.6 of this report.

Access to the bridge itself will also be controlled by gates at either end of the route: one at the KXC abutment and one where the ramp meets Camley Street.

It does not appear that the concerns regarding the level of security from the bridge to CSNP and thence to the adjoining Lock Cottage and SPCC grounds have been sufficiently addressed. The 1.4 m balustrade and 500 mm wide 'defensive' planting which is proposed for the side of the ramp on the CSNP boundary does not appear to provide adequate security. When the bridge is closed, security at the Wharf Road abutment is limited to a gate only 1.4 m high. The other public boundary proposals are 1.9 m or 2.2 m high fences. The existing gates to the CSNP are some 5.0 m high and the SPCC gates are 2.4 m high set in a metal palisade fence.

Whilst the proposals do give some increase in the height of the boundary fences between SPCC and CSNP and between the latter and Camley Street, there does not appear to be any real level of security preventing access from the ramp into the CSNP, merely a 1.4 m high balustrade which could be easily crossed by anyone intent on gaining access to the private grounds of CSNP, the Lock Cottage and SPCC. It is assumed that LWT on behalf of CSNP are aware of these proposals and may be commenting to the Council in similar terms.

Should the LWT not obtain an increased level of security to their grounds from the ramp, it would seem essential that the boundary between the CSNP and the canal bank and thus the Lock Cottage and SPCC be securely fenced to a similar standard to that proposed between SPCC and the ramp.

Drawing BR3_1003_C of the Drawing package is a plan at canal bank level and shows the existing 1.4 m post and rail fence retained between the CSNP and CRT mooring, from where one can walk up the steps and into the Lock Cottage and SPCC grounds. *(This drawing is reproduced as the second of the marked up plans appended to this document.)* There is an existing 1.8 m palisade fence between the SPCC boundary and the Lock Cottage and a 1.8 m

metal bar fence on the path at the south end of the CRT mooring. As the levels in the CSNP are being reduced and all the existing dense planting removed along the boundary to the canal the current fence provides no security. Replacing this with a 1.8 m palisade or similar would alleviate the problem.

Drawing BR3_1013_F of the Drawing package shows the overall security provision. *(This drawing is reproduced as the first of the marked up plans appended to this document.)* There appears to be little security between the bridge and CSNP, only the 1.4 m balustrade to the ramp. This would be of little hindrance to anyone considering gaining access to the Lock Cottage and SPCC grounds via the route outlined in the comments on drawing 1003. The 1.9 m bridge gate to Camley Street will be locked at night but there is still easy access over the 1.4 m gate at the Wharf Road end of the bridge.

Condition 16: UDR [Page 41 of Submission].

Ramp Handrails

On the northern edge of the ramp, where the gradient of the adjacent landscaping is sufficiently flat and level with the ramp surface, a portion of parapet will be free of posts, opening the bridge up further to the green space and planting. In this location, the timber posts will 'peel away' from the parapet to form the boundary fence with the St. Pancras Cruising Club to the north. The handrail and top rail will continue round the bend, supported by slender steel posts at approximately 1500mm centres.

Although not fully detailed on any submitted drawing, it appears that the current 1.8 m fence and nearly impenetrable planting that exists to the south of the SPCC boundary within CSNP will be replaced by a chain link fence with timber posts, 500 mm of 'defensive' planting and an open handrail on posts. This will greatly increase the visibility of the SPCC car park from the public realm

BOUNDARY TREATMENTS

Condition 16: UDR [Page 41 of Submission].

Boundary Treatments

Along the SPCC boundary, the intention is to minimise visual permeability and increase security. To this end the proposed boundary will be formed by a metal chain link fence that will also act as a trellis for creeping plants. In a short space of time the boundary will become a vertical extension of the CSNP, providing a green planted backdrop to the northern edge of the park and a secure and private boundary for the SPCC.

The description of a chain link fence on timber posts with some creepers as a means of reducing visual permeability is disingenuous. The current planting on the boundary, whilst including some ivy and other creepers on the 1.8 m timber stockade fence, is backed by mature tree and shrub planting mostly over 3.0 m high. The further description of a green planted backdrop to the CSNP and private boundary to SPCC may be achievable, however with the planting proposed this will take very many years to mature and spread into anything resembling a boundary hedge, not the *short space of time* referred to.

The proposals will drastically increase the visibility of areas of the SPCC car park including the bicycle racks, gas bottle store and other areas currently hidden from general view and thus increase the attraction for anyone intent on gaining access to these private grounds.

The current view of the SPCC car park from the public realm is limited to the first 5-6 car spaces and the end of the CRT rubbish bins through the palisade fence to Camley Street. From the canal there is a minimal view through the fence to the south of the lock cottage, and even from the private grounds of the CSNP the view is restricted by the planting and their composting bins and other structures. The proposal removes nearly all the current planting in the northern part of the CSNP and additionally flattens the existing mound. The impact of this will be to give virtually uninterrupted views from the bridge ramp, but also from Camley Street when the bridge is closed, to the canal, the Lock Cottage and the SPCC car park.

SOFT LANDSCAPING

Condition 16: UDR [Page 49 of Submission.]

Defensive Planting

In order to discourage people from scaling the parapets and accessing the land to the north and south of the proposal, the scheme includes some defensive planting, to both sides of the ramp. Native species with a densely growing and/or thorny character have been selected for these areas. They will include Blackthorn, Hawthorn, Hazel and Dog Rose, as shown in the Proposed Planting Palette and Schedule, located within the accompanying Drawing Package.

The proposals do not show access to the land to the north of the ramp up to the SPCC boundary protected by a parapet, merely a 1.1 m handrail on posts at 1.5 m centres. That would be insufficient to protect the planting from dogs or small children from the new school in Building P1 who will form part of the foot and cycle traffic expected.

Drawing BR3_1014_F of the Drawing package shows defensive planting between the bridge ramp and the SPCC boundary fence as a 1.0 m wide strip beside the bridge, this is then part over-hatched to indicate a 500 mm maintenance strip leaving only 500 mm for the actual planting zone. *(This drawing is reproduced as the third of the marked up plans appended to this document.)* This would appear inadequate to provide space for the proposed Hawthorn and Blackthorn hedging to achieve a size to be effective as defensive planting.

Planting palette: [Page 66 of Submission.]

2c. Defensive Planting along Bridge on North Side

The defensive planting is described elsewhere in the submission as being of Hawthorn [Crataegus] and Blackthorn [Prunus Spinosa]. The planting palette additionally gives Ivy [Hedera Helix] and Periwinkle [Vinca Major], these are shown as forming 50% and 30% respectively. That mix would leave only 10%

each of the thorn bushes which should form the hedging to become 'defensive' planting.

The low density proposed for the hedging, combined with the width of the planting zone as only 500 mm [the 1.0 m zone is half taken with a maintenance path] would be unlikely to form a contiguous hedge for many years to come. In any case, at these proportions, the Ivy would be likely to predominate and kill off the thorn bushes.

BOUNDARY FENCE MAINTENANCE

Condition 16: UDR [Page 49 of Submission.]

Boundary Fences

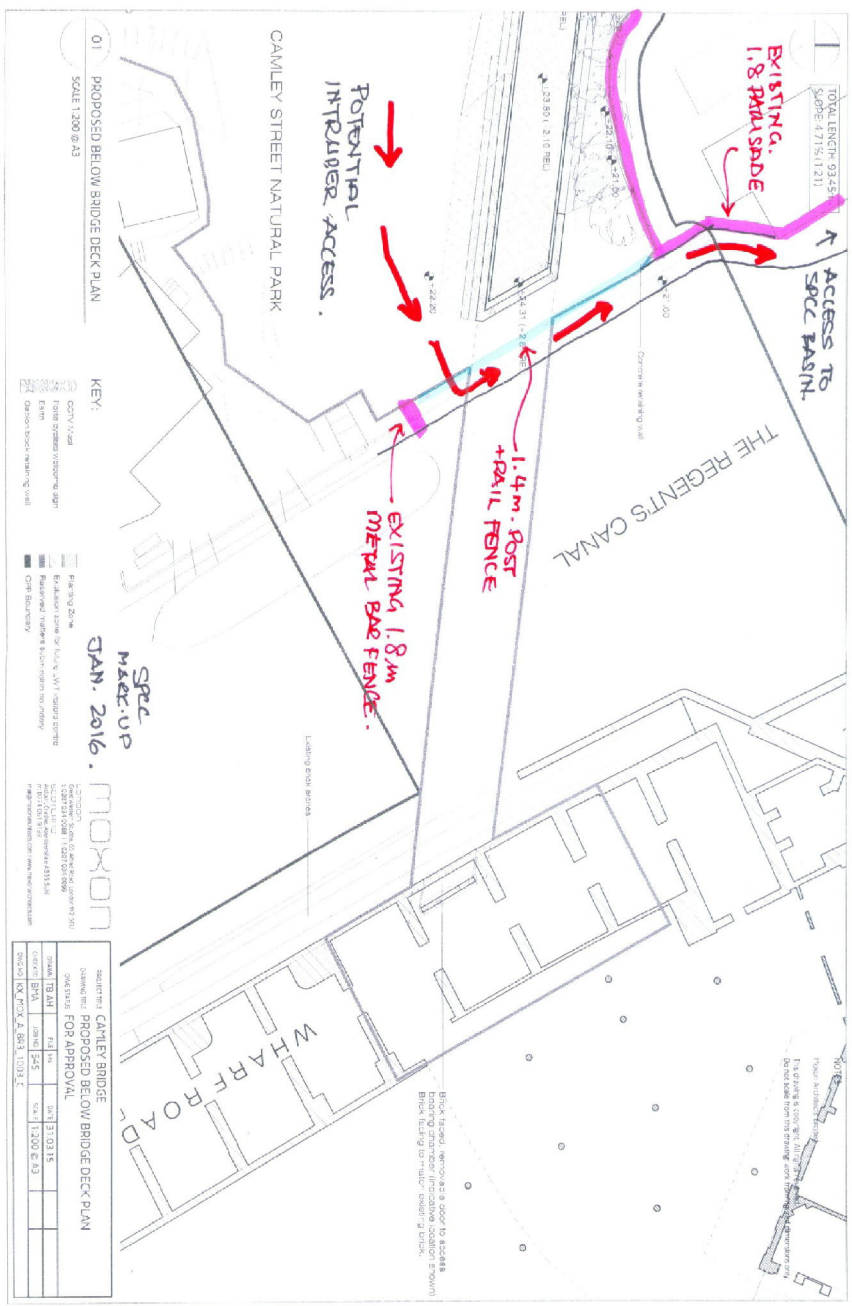
In addition to the parapets designed for the ramp and along the main bridge span, the proposal also includes fences to the north, on the CSNP/SPCC boundary and to the west, on the CSNP/Camley Street boundary, up to the SPCC entrance gates.

The fence on the northern boundary will see an existing timber fence replaced with a higher steel fence onto which creeping plants will be encouraged to grow.

The existing timber 'stockade' along Camley Street will be replaced by a robust, but visually more permeable, timber fence with high quality detailing to match that of the timber balustrade to the ramp elsewhere.

Whilst the proposed fence on the northern boundary is 2.2 m compared to the existing 1.8 m fence, it is proposed to be a chain link wire fence on timber posts against the current heavy timber post 'stockade' backed with extensive planting. Such a considerably lighter construction will require good and frequent inspection and maintenance to retain it in a secure condition

The description of the Camley Street boundary treatment as visually more permeable also reinforces that the proposals will open up to view areas that are currently only glimpsed through gaps in fences and hedging.



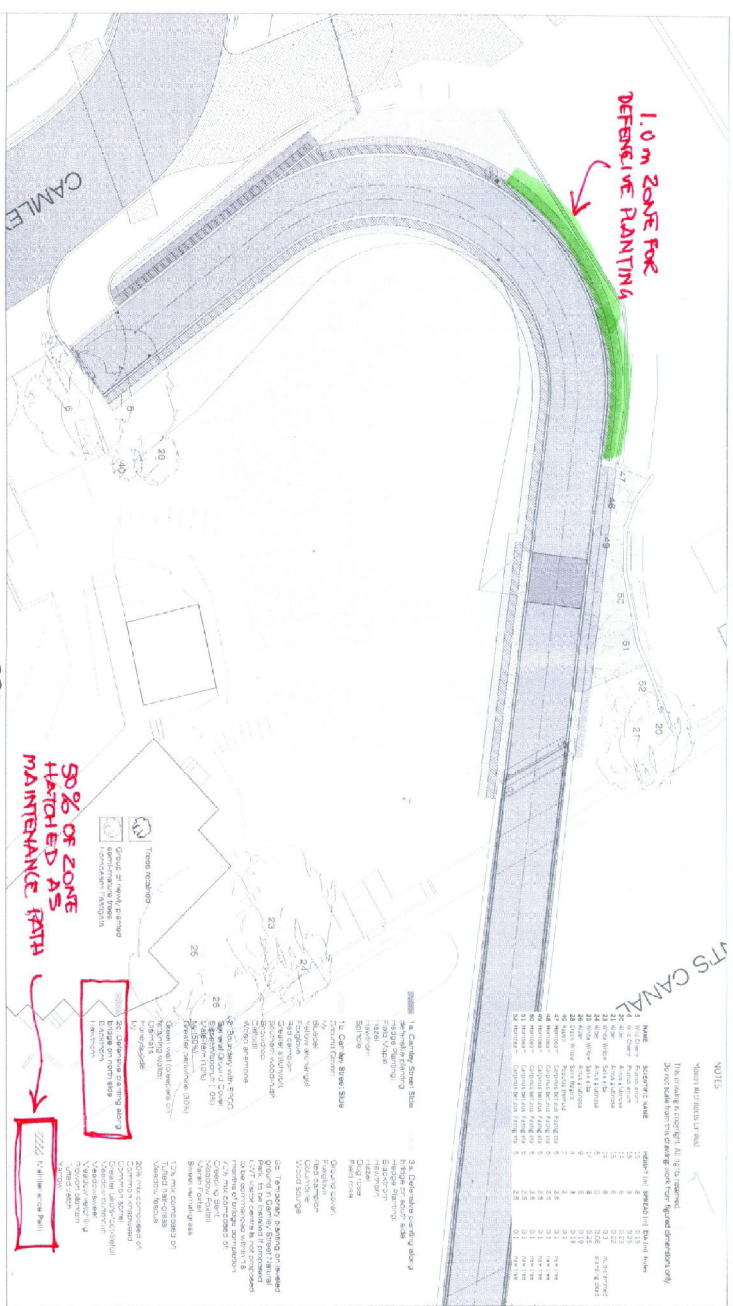
01 PLANNING SCHEME
SCALE 1:300 @ A3



SPEC
MAY 2016
JAN 2016

PROXON
100% OF THE PROPOSED PLANTING SCHEME
FOR APPROVAL

DATE	BY	FOR	SCALE
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16



NOTES

1. All work to be completed by 15/01/2016.
2. All work to be completed by 15/01/2016.

DATE	BY	FOR	SCALE
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16

DATE	BY	FOR	SCALE
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16

DATE	BY	FOR	SCALE
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16

DATE	BY	FOR	SCALE
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16
10/01/16	10/01/16	10/01/16	10/01/16