

Martyn Goddard  
5 Ivor St  
London NW1 9PL

21st May 2022

Dear Patrick Marfleet,

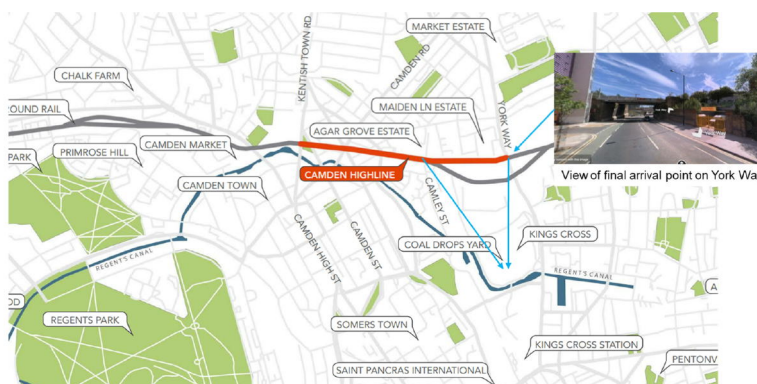
**RE: 2022/2019/P : Camden Highline Land between Kentish Town Road and Royal College Street including Camden Gardens and 223 Royal College Street and Camden Road Railway Station Camden Road London NW1 9LS**

I am writing, as a concerned local resident to seek strict planning conditions on the above application.

Discussions have been underway for some time for this project. In principle we have several objections to the concept of an elevated park. However, it's the detail of what you are trying to achieve needs clarification how it is funded and how it contributes positively to the local community is very important.

#### Key areas of concern

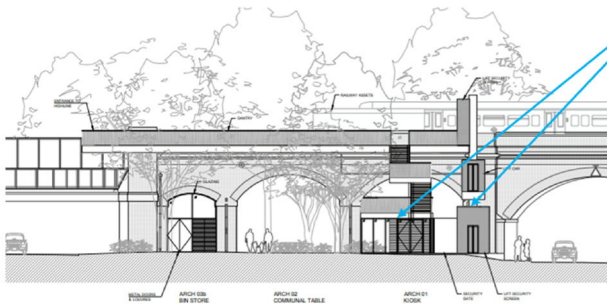
1. **The Route** (see diagram 1 below): The route is proposed to start in Camden Gardens and take pedestrians to Kings Cross. This is one of the key benefits stated to encourage commuters to use the park rather than the roads. However, the line does not go to the central area in Kings Cross. If walking to or from Kings Cross, Coals Drops Yard or Granary Square the most direct route to Camden and the market is via the Regents Canal. If walking along the proposed route it would make sense to access or leave the proposed Highline at Camley Street and join the canal.



There is no alternative to the proposed route as this is the only piece of currently disused track. The precedents put forward in the planning application are all, with one exception, on disused lines. This proposal runs along side a busy active line that included both commuter trains and freight trains.

2. **Security and Ant-social behaviour:** I personally have met with Simon Pitkeathley to raise concerns about the security and maintenance of the proposed park. It was suggested that people already accessed the discussed railway illegally to graffiti etc. I understood the proposals would not make access easier.

The design of the stair access in Camden Gardens appears to provide relatively easy access to those intent on graffitiing or causing anti-social behaviour. Indeed, the design may encourage some to try to climb up causing them to come to harm.



Design of the access stair appears to provide a relatively easy route to climb the structure and access the park out of hours

Diagram 2

I am unable to find any reference to policing the park or funding to cover private security. Camden Town has a significant issue with drug dealing, drug using, street drinking and anti-social behaviour. How will the park be safe for use when there is limited overlooking, significant planting and screening from the trains? Unless there are periodic patrols by the police it will lead to drug dealing, drinking and people playing loud music from portable speaker. This is already a problem in local residential streets.

3. **Events:** May of my neighbours were as appalled as I was to see that the proposal for Phase 1 include two event spaces and a stage. This area is on the periphery of the cumulative impact zone and is relatively quiet in comparison to the town centre. The location of the proposed events space is surrounded by residential properties. The idea that a stage with raked seating for c.90 people would not cause noise nuisance to residents is absurd. The ambient noise levels around Camden Road may be relatively height but they do not include music or amplified voice. An environmental psychologist might advise that it is not the Db levels of noise that necessarily cause nuisance but the type of noise. The second event space is for 120 people. It is conceivable that Camden Highline would rent them out together for a large event of over 200. The proposal is for a maximum of 10 per annum outside park opening hours on top of what we must assume to be a rolling programme of events during the year when the park is open. This is completely unacceptable.



Phase 1 area is surrounded by residential property highlighted in blue. Most is fully residential with a small number being residential over commercial.

**Diagram 3**

4. **Overlooking:** The proposal for 'woodland balconies' is not something we support. The one proposed to look over Prowse Place will compromise the privacy of Nos. 9 & 10 Ivor Street. Whilst they may be some meters away the view is to their bedroom and living room windows. It is not clear what the view past these properties will be as no illustration has been provided. We would like this to be reviewed and further illustrations provided. The balcony onto Royal College Street has the same issue of looking directly over to residential properties.
5. **Filming:** The Camden Highline will actively market the park for filming revenue. Filming is disruptive and impacts the local community negatively. Parking spaces are suspended and there is disturbance from noise and light when filming outside park hours.
6. **Lighting:** The lighting scheme appears to be very much designed for events after dusk. The lighting should be sufficient for emergencies only as the park should not be in use after dusk.
7. **Funding:** 2.4.7 and 2.4.8 from the Business Plan highlights the need for rental income from events and filming that we believe will negatively impact the surrounding residents. 2.4.8 suggests turning the arches in Prowse Place into events space managed by CH. This is again completely unacceptable.

Extract from CHL Business plan:

*7. Assuming that the business model is not predicated on admissions or public subsidy, and that voluntary and sponsorship income is possible, but limited, the best remaining option upon which to build a viable business model is to monetise the experience and its throughput via ancillary Camden Highline Business Plan 8 commercial activities. The opportunities will normally include: (a) food and beverage; (b) retail; (c) paid special events; and (d) private hire and hospitality.*

*8. The Highline could achieve similar success as an events destination, provided that it has access to spaces that can be used independently of day-to-day operations. The arches previously occupied by*



Warren Evans would be ideal in this respect, and we would strongly recommend that these be included as part of the CHL demise. We understand that there are additional units that may be serviceable near the Bonny Street arches, although these are presently inaccessible from the street. Similarly, the Camden Gardens space at the western access point could be attractive for both commercial and community events, pop-up installations and other retail or F&B concessions. A particular attraction of this space is its close proximity to Camden Lock Market. To the extent that CHL can secure the appropriate licenses or permissions to use this space – at least for a defined number of days per annum – it could be an important income-generating asset. This includes both the open-air space controlled by LB Camden, and the under-arch space controlled by Network Rail.

#### 4.2.5 Events

Income from events is modelled as follows:

- Small events that can be hosted along the widest part of the Highline in section 1, without closing the entire destination to the public
  - A flexible outdoor space with capacity for approx. 80 people
  - 10 events per year and £2,000 hire income per event
  - Income £20,000 per year.
- Exclusive use events, when the Highline will be completely closed to the public
  - On the one hand, this is a unique venue that will be only occasionally available and could potentially attract a premium price; on the other, it is an untested product that is likely to come with relatively high management costs to be passed on to event promoters
  - 5 events per year and £8,000 hire income per event
  - Income £40,000 per year.

Event promoters would pay a fixed fee for use of the space and bear all of the costs of staging and delivering the event. No discounts are assumed for BID members, community organisations, sponsors, and so on.

Figure 13: Six-year Profit and Loss

	Section 1		Section 2		Section 3	
	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6
<b>REVENUE</b>						
CONCESSIONS	£40,500	£40,900	£41,300	£41,700	£42,100	£42,500
FUNDRAISING	£83,100	£87,900	£106,700	£106,700	£106,700	£100,500
FILMING	£16,000	£16,200	£28,600	£28,800	£41,600	£42,000
MEMBERSHIP	£16,300	£16,400	£29,000	£29,300	£42,300	£42,700
EVENTS	£24,000	£24,000	£42,000	£42,000	£60,000	£60,000
CAMDEN GARDENS RENTAL INCOME	£80,000	£80,000	£80,000	£80,000	£80,000	£80,000
RENTAL INCOME TARGET FROM OTHER SPACES	£500,000	£500,000	£800,000	£800,000	£1,000,000	£1,000,000
<b>TOTAL REVENUE</b>	<b>£759,900</b>	<b>£765,400</b>	<b>£1,127,600</b>	<b>£1,128,500</b>	<b>£1,372,700</b>	<b>£1,367,700</b>

#### Extract from P&L and business plan

It seems clear from the business plan that the financial viability of the scheme relies to a significant level on events and filming.

#### Summary

We object to this planning application as it currently stands. We would like the council to consider as a minimum the following conditions of any planning approval:

1. No events at any time outside the park opening hours
2. No licensed areas at any time
3. No noise amplified voice or music at any time (live or recorded)
4. Redesign the access stair in Camden Gardens to prevent anti-social behaviour and climbing up to the Highline out of hours.

5. No noise to emanate from the premises, so as to cause noise nuisance to local residents
6. Maximum of 2 filming slots per year over a maximum period of 6 days
7. An overview of how anti-social behaviour will be actively prevented and policed

Yours faithfully,

Martyn Goddard

Resident: 5 Ivor Street, London NW1 9PL