



08 June 2022 v1

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 OBJECTION/COMMENTS v1

I am writing, as Chair of TRACT (Tenants Residents Associations, Camden Town) and a local resident to seek strict planning conditions on the above application should it be considered for approval.

Broad discussions have been underway for some time for this project. In principle we have no objection to the concept of an elevated park. However, the detail of what it is trying to achieve, how it is funded and how it contributes positively to the local community are critical. There have been NO detailed or targeted consultations with local residents directly impacted by these proposals.

Key areas of concern

1. **Planning Statement:** The proposal is to introduce a new community facility and tourist attraction. They state in 5.1 that they have undertaken detailed pre-application engagement with local residents. This is not true. Not one of my neighbours has been contacted to discuss anything in detail. We have not been told about the proposed events space or other fundraising activities. The community involvement plan shows many 'logos' of local community groups or icons but it is incorrect, there is no detail regarding who they have engaged with and what that engagement consisted of and is therefore misleading.

Relevant policy guidance.

1. **Overlooking and amenity.** LBC requires all development to mitigate against impacts on residential amenity. This current proposal does the opposite with specific locations designed to overlook residential properties and paths that run too close to the parapet wall that even with some evergreen planting will allow overlooking to upper floor bedrooms.
2. **Noise effects** (London Plan Policy D14 and Local Policy A4): neither of these is being met as they propose to create noise from events that will impact local residents on Prowse Place, Ivor Street, Royal College Street, Camden Road, Bonny Street and Camden Street. The existing ambient noise in homes and gardens is not high. The proposal for events space will impact nearby residents' amenity. The proposals for events in Camden Gardens will negatively impact local residents' amenity.
3. **Heritage** including London Squares Preservation Act 1931 requires that Camden Gardens be used for ornamental garden, pleasure grounds, or ground for rest, play and recreation. The proposals seek to install 2nos retail kiosks with power, plumbing and drainage. They may be removable after 25 years, but they will take up significant space currently used as garden space and provide no benefit to local residents. The proposed lift is only temporary in that the location can be demolished after 25 years. It is not a temporary structure as it will have foundations. I assume the retail units will also have a foundation.

The conclusion item 8.2 is incorrect. There have been no extensive or detailed pre-application discussions and consultations with the local community that is directly impacted by the proposals.

2. **The Route** (see diagram 1 below): The route is proposed to start in Camden Gardens and takes 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. This begs the question of why then take the route through to the proposed phase 3 location?

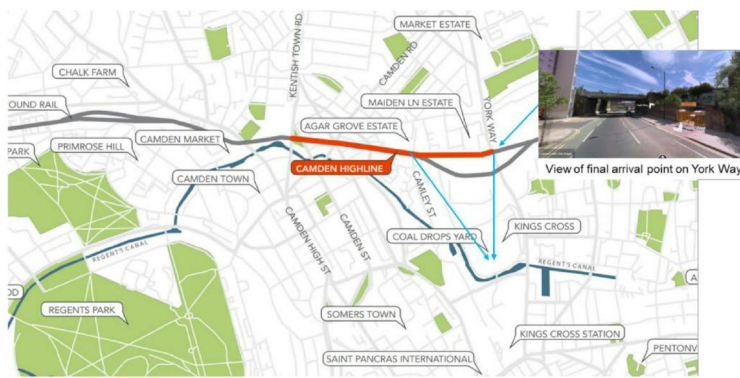


Diagram 1

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 alongside a busy active line that included both commuter and freight trains. There are no great views to be had as one side is a screen to the active line and the other planting to form a screen to residential properties that would otherwise be overlooked.

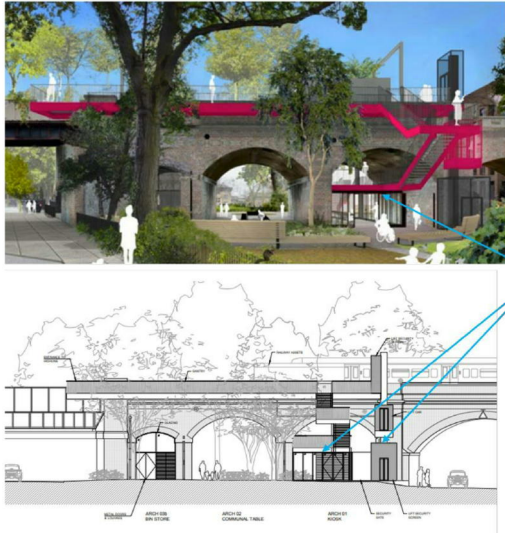
The location of the Camden Highline is interesting for having substantial anchors at either end: the hugely popular Camden Lock Market at the western end, and rapidly developing Kings Cross at the other. These are important, heavily trafficked London destinations. This major locational benefit, however, must be set against the following factors:

1. The Highline *almost* - but not quite - reaches them both. It neither starts nor ends in Kings Cross or Camden Market; it only lands *near* these destinations. The disconnect is small, but important and will have a bearing on throughput. That said, having sizeable existing markets close to both ends of the Camden Highline gives it an advantage relative to New York's High Line, which whilst in Manhattan, was not situated close to any existing tourist centres when it was first established.
2. Unlike the NYC's High Line or the Promenade Plantée, Camden's Highline would have a direct competitor in the sense that there is already a pedestrian route that travels a similar distance to broadly the same places and beyond (i.e. the Regent's Canal Towpath). While the Highline would

Above extract from the Business Plan

3. **Security and Ant-social behaviour:** I have met with CTU 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 in addition to enabling anti-social behaviour.



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 speakers. This is already a problem in local residential streets.

4. **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 high but they do not include music or amplified voice. It is perfectly normal to enjoy birdsong in our gardens. 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 and must not be allowed.

The 'grandstand' will encourage anti-social behaviour by providing space for large groups of teenagers to gather, drinking, smoking and playing music. There are no proposals that I can see to police this kind of activity.



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

5. **Overlooking:** The proposal is that the Highline becomes a new tourist attraction. This implies many visitors using the park and walking behind residential properties. 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 a few 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. The balcony onto Royal College Street has the same issue of looking directly over to residential properties and compromising privacy. This application proposes that many people will use the Highline each day. Local residents do not want those using the Highline looking into their windows or private gardens. The location of the pathways is too close to the parapet wall and will allow Highline users to see into Ivor Street and Royal College Street properties and gardens.
6. **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. This is not acceptable without limitations as to the number of filming events allowed each year and specific limitations on which parts of the park they can film so as not to cause disturbance to residents.
7. **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. This applies to Camden Gardens as well.

8. **Camden Gardens:** Is a small public garden and amenity space. The Highline proposals seek to turn it into a monetised retail space with little room for locals to enjoy the park. The proposal for a bench table that impedes those walking through the park (the only arch left once the stairs and retail kiosks are installed) and will encourage anti-social behaviour from teenagers drinking and playing music. A better proposal would be for small areas of seating for groups of 2-4 for short term use.

The proposal for two kiosks is too much. One kiosk for counter-service non-alcoholic refreshments will already take up a lot of the garden space. There seem to be no reason why a temporary mobile kiosk could not be used. The proposal for a second kiosk is unacceptable as it begins to make the park into a retail destination. The space under the stairs would be better used to teach gardening to local community groups.

9. **Benefits Analysis:** On reviewing the summary page inserted below there appears to be little overall benefit impact from the Highline to the local area especially when balanced with the capital costs, annual funding for maintenance, construction disruption and ongoing disturbance to local residents.

Item 3.41 suggests that Camden Town Underground Station will be redeveloped and that this will provide another link and therefore be a benefit. We all know that there is no funding to redevelop Camden Town Station, that no work is underway to do so and that TfL's priority for redevelopment is Holborn Station which is currently not funded.

Camden Highline Benefits Analysis

Table 4.1 Highline Impact Framework

Impact Area	Activity	Scoping Assessment
1. Construction and Operational Impacts	Construction - employment impacts	Construction employment likely to be supported, but <u>relatively small scale and temporary</u>
	Construction - access to employment and training	May be potential to deliver wider social and economic benefits: e.g. linking to local employment / training schemes
	Operation - direct impact supported by employment programmes	Number of jobs to be confirmed. Likely to be <u>small scale</u> (maintenance, concessions etc), but could deliver strong social outcomes if linked to local employment programmes
	Multipier impacts (operational supply chains)	Potential for some local procurement benefits, but likely to be <u>small scale</u>
2. Development and Property Impacts	Increase in value for existing residential	Potentially significant impact, but <u>existing high quality green space locally may impact on potential for uplift?</u> Need for caution re 'gentrifying' effects
	Increase in values for existing commercial premises	Strong potential for commercial property values in area to increase (e.g. arches). Need for caution re 'gentrifying' effects. <u>? UNLIKELY AS SOME EMP? NOW.</u>
	Increase in future development value	Significant development potential in local area potential to lead to uplift in values. Particularly for developments to east of route (close to Camden town). Again need for caution re 'gentrifying' effects. <u>? HOUSING ASSOCIATION / LOCAL FINANCING?</u>
Accelerating development	Development momentum already driven by King's Cross regeneration. Highline <u>unlikely to accelerate development</u>	
3. Benefits to Camden's economy	Multipier impacts (local visitor economy)	Potential to support the vitality of Camden TC, generating increasing spend in the local economy. But will need to take into account the extent to which visits are <u>new or linked to existing visits</u>
	Inward investment: attracting higher value uses	Camden and King's Cross already have strong offer to attract high value businesses, therefore impact likely to be <u>small</u> . However, arches provide opportunities to attract new businesses. <u>Need for caution re displacement of industrial users. ?</u>
4. Economic and social benefits for users	Journey time savings	Value as transport route to be explored. Note existing King's Cross to Camden route via canal, and connections at either end. Initial assessment is that time <u>saving benefits may be limited</u>
	Safety benefits	To be explored based on extent to which it takes pedestrian journeys off the road. <u>Likely to be limited impact</u>
	Health benefits (reduction in pedestrian exposure to emissions and increased physical activity)	To be explored: extent to which space creates additional recreation opportunities. <u>May be limited due to existing green space locally (no identified deficit)</u>
5. Environmental Impacts	Ecology	Positive impact on biodiversity from linear greenspace and new planting
	Tramscap and Heritage benefits	Restoration of Grade I Listed structures as part of re-opening entrance to Camden Road Station from Royal College Street
5. Public sector benefits	Noise, air quality & carbon impacts	Potential to discourage private car trips resulting in a reduction in emissions. <u>? RUBBISH - NO PARKING + PLenty OF PUBLIC TRANSPORT</u>
	Increase in business rates (via increases in existing and proposed commercial value)	Dependent on scale of development and investment impact above. <u>RETAIL & OFFICE SPACE MARKET POOR.</u>
	Increase in council tax revenue (via increase in existing and proposed residential values)	Dependent upon reclassification of properties into higher bands as a result of value uplift. <u>? NO THANKS. ? INCREASED RENTS + SOCIAL DISPLACEMENT.</u>
Health savings	As above, health benefits <u>likely to be small given the other green space nearby and alternative walking route</u>	

Above extract from Regeneris document

10. **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 an events space managed by CH. This is again completely unacceptable. We as residents would strongly object to the arches in Prowse Place being part of the CHL demise. We understand from the clarification document that none on the arches on Prowse Place or Bonny Street are to be included in the business plan. This appears to leave a c.£500,000.00 gap in funding.

2. We further assume that none of LB Camden, the Mayor's Office or the LEP are currently minded to provide a material amount of ongoing revenue support.

6. By contrast, we are confident that the Highline concept is sufficiently distinctive and impactful that it could attract some major corporate sponsors, depending on the value of inventory that can be assembled. This has been confirmed through initial consultation with a naming rights specialist and by reference to recent deals done, for example, on the Emirates Air Line, the Santander Bikes, and the mooted Sky contribution to the Garden Bridge. CTU intend to use sponsorship funding towards the capital build of the Highline rather than the revenue budget.

Above extract from CHL Business plan

Previous events in Camden Gardens have had a negative impact on the community and damaged the park. We have no objection to a small coffee outlet but strongly object to the idea that Camden Gardens is used to generate income from events. There seems to be no reason why a mobile coffee cart should not be used in a location such as this.

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.

Above extract from CHL Business plan

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.

The consequence of this approach is a financial model that is highly sensitive to the potential rental income from the ancillary spaces – i.e. there is a quantum of ancillary space that the Highline would need to control in order to achieve the target rental income; and to make the business model viable and resilient to unforeseen events or market changes.

Above extracts from CHL Business plan

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.

4 Financial Model

4.1 Summary

A projected 6-year P&L is shown below. We assume the second and third sections of the Highline would open in Years 3 and 5 respectively.

The P&L includes a significant rental income target from ancillary spaces. This target ramps up to £1 million per year following completion of the third section of the Highline. The surplus income each year is rolled into the contingency.

In the event that the lifespan of the attraction extends beyond the initial 6-year contract period with Network Rail, the income generated in reserve may be insufficient for the level of reinvestment desired to keep the attraction feeling new and high-quality. Further investigation is needed to consider how best to build in some added financial comfort or security.

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
REVENUE						
CONCESSIONS	£40,500	£40,900	£41,300	£41,700	£42,100	£42,500
FUNDRAISING	£85,100	£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
TOTAL REVENUE	£759,900	£765,400	£1,127,600	£1,128,500	£1,372,700	£1,367,700
EXPENDITURE						
STAFFING	(£286,600)	(£286,600)	(£440,300)	(£440,300)	(£579,000)	(£579,000)
PREMISES	(£54,200)	(£54,200)	(£101,600)	(£101,600)	(£135,500)	(£135,500)
GARDEN & MAINTENANCE	(£121,300)	(£121,300)	(£227,500)	(£227,500)	(£303,300)	(£303,300)
MARKETING	(£81,000)	(£81,000)	(£85,500)	(£85,500)	(£90,000)	(£90,000)
CONTINGENCY	(£216,800)	(£222,300)	(£272,700)	(£273,600)	(£264,900)	(£259,900)
TOTAL EXPENDITURE	(£759,900)	(£765,400)	(£1,127,600)	(£1,128,500)	(£1,372,700)	(£1,367,700)
(GAP) / SURPLUS	£0	£0	£0	£0	£0	£0

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 and the income from rental of space that is outside the CHL demise. This business plan seems flawed.

Given the requirement to raise even more funding each year it suggests that phase 2 and 3 maybe compromised or delayed leaving us with an outdoor events space that the local community do not want.

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 CHL park opening hours
2. No events at any time in Camden Gardens
3. No licenced areas at any time in the CHL or Camden Gardens, including TENS
4. No amplified voice or music at any time (live or recorded) in either location
5. No noise to emanate from the premises, so as to cause noise nuisance to local residents
6. Redesign the access stair in Camden Gardens to prevent anti-social behaviour and climbing up to the Highline out of hours.
7. Maximum of 2 filming slots per year over a maximum period of 6 days
8. An overview of how anti-social behaviour will be actively prevented and policed
9. No 'woodland balconies' to overlook residential properties
10. All pathways to be a minimum of 2m inset from the parapet wall
11. Planting to prevent overlooking to residential properties within 18meters of the parapet wall noting that if planting does not address the problem, then a screen maybe required
12. No fixed retail in Camden Gardens. A mobile coffee van could be used.
13. No seating areas to encourage groups of more that 6 to gather

I would be happy to discuss the above with you and interested neighbours at a convenient time in the coming weeks. I hope you will support the need to protect the amenity of residents when considering conditions for this application.

Yours sincerely,



Kate Gemmell
TRACT Chair