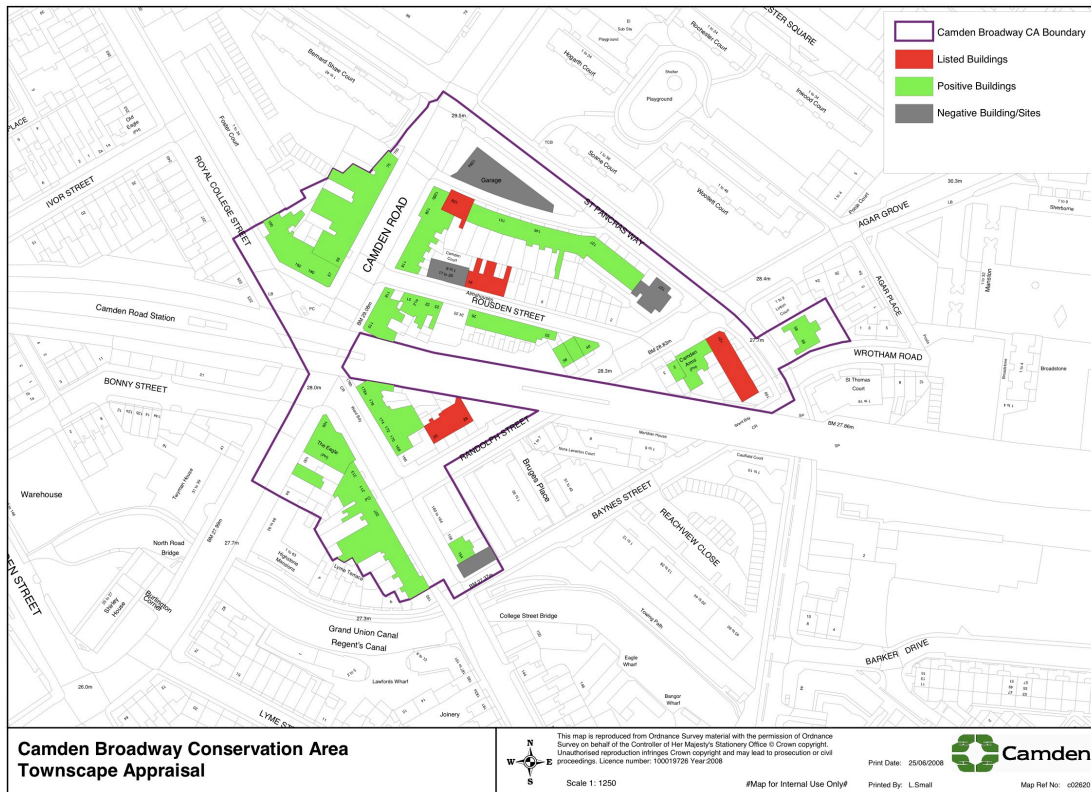


Camden Broadway Conservation Area Advisory Committee (Camden Broadway CAAC) Response to application 2022/2019/P

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

The eastern end of the application site boundary directly adjoins Camden Broadway Conservation Area. The map below shows the boundaries of the conservation area, which includes a section of the railway lines that the proposals seek to transform.



While Camden Broadway CAAC are in principle supportive of the idea behind the highline, the committee was disappointed that no effort had been made by the applicant's design team to engage with us directly and in a meaningful way. We met with CTU a number of years ago and expressed our interest in engaging with the design team, but no direct contact had been made. It is further disappointing to read in the application document that the applicant claims to have engaged with us (Planning Statement, 5.1 and 8.2), when in fact no effort was made to seek our views. Neighboring CAACs as well as Camden TRACT have reported a similar lack of consultation.

In addition to the lack of meaningful local engagement, the application lacks detail on funding, security (including out-of-hours security), maintenance and how it contributes positively to the local community

With this in mind, we request a series of conditions to be agreed to safeguard the interests of the local community.

Key areas of concern

- 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. The proposal is that the Highline becomes a new tourist attraction. This implies many visitors using the park and walking behind residential properties. The proposed woodland balconies directly impact adjacent residential properties. Meaningful engagement with affected residents would have addressed many of the issues present in the application.
- 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 25years, 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.
- 4. Security and Anti-social behaviour** 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. However we were unable to find any reference to policing the park or funding to cover private security. This part of Camden 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 security teams it will lead to drug dealing, drinking and people playing loud music from portable speakers. This is already a problem in local residential streets. We would seek conditions that clearly set out how in-use and out-of-hours security in and around the highline will be provided.
- 5. Events** We were surprised to read 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. Noise impact, management and policing of the event, and impact on the wider area all seem to have been neglected in the application documents.
- 6. Lighting** The lighting scheme appears to be very much designed for events after dusk. Light pollution does not seem to have been sufficiently considered, and it is unclear why lighting has not been designed for emergencies only as the park should not be in use after dusk. This applies to Camden Gardens as well.
- 7. Benefits to the local area** On reviewing the summary page there appears to be little overall benefit impact from the Highline to the local area especially when balanced with the construction disruption and ongoing disturbance to local residents. Again, engagement with organisations of

affected areas could have provided valuable insight to how the highline could benefit these areas.

8. **Financing:** 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.

Summary

While we support the highline in principle, we object to this planning application as it currently stands and very much regret the lack of engagement with local organisations. We believe that a design developed with the local community could have resulted in proposals that we could all support.

We would like the council to consider as a minimum the following conditions of any planning approval:

1. A detailed strategy of how anti-social behaviour within and outside highline opening hours will be actively prevented and policed
2. A detailed strategy for how the highline will be maintained long-term and kept clean on a daily basis if the projected income falls short
3. Meaningful engagement (in the form of dedicated in-person meetings and workshops) by the applicant and the design team with local organisations including relevant CAACs, residents organisations, businesses for future phases of the highline
4. A detailed strategy for local area benefits and improvements
5. No events at any time outside highline opening hours
6. No licenced areas at any time in the highline, including TENS
7. No amplified voice or music at any time (live or recorded) in the highline
8. No noise to emanate from the premises, so as to cause noise nuisance to local residents
9. Redesign the access stair in Camden Gardens to prevent anti-social behaviour and climbing up to the highline out of hours.
10. Maximum of 2 filming slots per year over a maximum period of 6 days
11. No 'woodland balconies' to overlook residential properties
12. All pathways to be a minimum of 2m inset from the parapet wall
13. 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 may be required