

Patrick Marfleet
London Borough of Camden
Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

30 August 2022

Dear Patrick,

RE: 2022/2019/P, Camden Road Railway Station, Camden Road, London, NW1 9LS, 223 Royal College Street, London, NW1 9LT

I refer to the recent application for the Camden Highline and the “*Camden Highline Metropolitan Police Planning Comment Responses*” document. The Metropolitan Police Service (MPS) welcomes the Camden Highline’s agreement that a contribution towards policing infrastructure is necessary, and that the contribution should be made prior to the opening of the Camden Highline.

The MPS however does have concerns in relation to items raised within the response, specifically on points 1 & 2 wherein the applicant proposes a revised s106 contribution of £26,565.96. The nature of these concerns is set out on a point by point basis within this letter as follows:

“Crime on the New York High Line is very low. In its first two years of operations only two crimes were reported, one for staircase graffiti and the other for a lost wallet. The reasons for this low crime rate hold true for the Camden Highline, but not the Royal Parks across London:

- *It will be busy, providing passive surveillance across it’s entire area. Its small area and linear nature provides less spaces for would-be criminals to hide or blend in.*
- *Its linear and narrow nature means lines of sight are good and there are few areas of concealment.”*
- *To argue a small area and linear nature would be harder for suspected offenders to blend in misunderstands the nature of certain types of criminal activity. Busy areas offer opportunities for blending into crowds, whilst the elevated nature of the proposed highline would reduce visibility from the street from other officers who may be on local patrol underneath or around the parks.*
- *“It’s an elevated park/walkway with two access points and no way to exit the park elsewhere. Regents Park has 16 in comparison. Combined with the high footfall, this limit of escape routes makes crime less appealing on the Highline.”*
- *As with the New York Highline the proposed route passes several locations where those involved in criminality could jump off onto roofs, or spaces and areas of other land & buildings, meaning there will likely be a number of alternative escape routes for those who have already broken the law.*

“As outlined in 1. the Camden Highline’s layout and design affords it passive crime protection not available to the Royal Parks. We propose the Highline’s policing requirements be reduced by 50% to account for this. 2 FTE Police Officers required for 2.5m visitors (50% reduction) = £66,414.89”

Allowing for only 2 officers means when taking into account a shift patterns, rest days etc coverage there would be a greatly reduced ability to manage the crime and patrol of the Park. The MPS’s proposed 4 officers *would mitigate this risk by allowing more comprehensive coverage.*

- *“The estimate of 2.5m visitors a year is for when the Highline is complete, running from Camden Gardens to York Way. This planning application is for the first section (Phase 1), roughly 1/3 of the route from Camden Town to Royal College Street. For this section the business plan estimates yearly visitors of 1m (see page 21). 1m rather than 2.5m visitors (60% reduction) = £26,565.96*

- *We proposed a revised contribution of £26,565.96.”*

The proposed revised contribution would require the MPS to recruit 0.8 of an officer. Practically this is not possible, and as detailed above would not provide a suitable coverage for the proposed visitor numbers. The requirement for a policing presence will commence as soon as the first section of the Camden Highline opens.

The MPS does also acknowledge that the Camden Highline will open in stages and that visitor numbers may be low initially, as such the MPS would propose a contribution of £66,414.89 to be received 3 months prior to opening, with a further £66,414.89 contribution to be received once visitor numbers increase above 1m in any one year period.

Jonathan

CAMDEN

H I G H

L I N E

CAMDEN HIGHLINE METROPOLITAN POLICE PLANNING COMMENT RESPONSES

No.	Comment	Response
Metropolitan Police Estate Strategy & Engagement Team		
1.	Crime on the New York High Line is referenced to exemplify the need for policing.	<p>Crime on the New York High Line is very low. In its first two years of operations only two crimes were reported, one for staircase graffiti and the other for a lost wallet. The reasons for this low crime rate hold true for the Camden Highline, but not the Royal Parks across London:</p> <ul style="list-style-type: none"> - It will be busy, providing passive surveillance across its entire area. Its small area and linear nature provides less spaces for would-be criminals to hide or blend in. - It's an elevated park/walkway with two access points and no way to exit the park elsewhere. Regents Park has 16 in comparison. Combined with the high footfall, this limit of escape routes makes crime less appealing on the Highline. - Its linear and narrow nature means lines of sight are good and there are few areas of concealment. - It will be secured at night, and due to its elevated location unauthorised night access will be much more difficult than the Royal Parks.
2.	The calculation proposes four FTE police, with the Camden Highline contributing £132,829.77 for their set-up costs. This is based on the visitor-police ratio in the Royal Parks, and the Camden Highline's estimated 2.5m visitors a year.	<ul style="list-style-type: none"> • As outlined in 1. the Camden Highline's layout and design affords it passive crime protection not available to the Royal Parks. We propose the Highline's policing requirements be reduced by 50% to account for this. <i>2 FTE Police Officers required for 2.5m visitors (50% reduction) = £66,414.89</i> • The estimate of 2.5m visitors a year is for when the Highline is complete, running from Camden Gardens to York Way. This planning application is for the first section (Phase 1), roughly 1/3 of the route from Camden Town to Royal College Street. For this section the business plan estimates yearly visitors of 1m (see page 21). <i>1m rather than 2.5m visitors (60% reduction) = £26,565.96</i> • We proposed a revised contribution of <u>£26,565.96</u>. • As the policing won't be required until the Highline is open to the public, we propose this contribution be made 3 months before opening.

Designing out Crime Team

3. The staircase extending from the western arch, and table in the middle arch will cause overnight antisocial behaviour. This could be mitigated by fencing the entire park to 1.8m. Or by modifying the design so that the staircase is enclosed in the arch, and for both arches to be entirely gated and locked overnight. Rather than gating the middle arch the furniture enclosed could also be demountable and removed at night.

Activating Camden Gardens in the daytime will be positive for the park and the area. Signage, management and rule setting on the Highline will reduce the risk of crime and antisocial behaviour.

Camden Gardens is currently a hotspot for anti-social behaviour (ASB), both day and night. 25 stop and searches were undertaken there between January-June 2022.

- The large arches provide shelter and low-visibility places for rough sleeping, drug taking, public defecation and other ASB.
- It's encircled by roads, which reduces overlooking from nearby buildings and discourages visitors.
- It doesn't afford any pedestrian shortcut/desire paths, so pedestrian footfall through Camden Gardens is low.
- The ASB occurs throughout the day and night so is entrenched.
- These issues combine to reduce routine normal use of the park, and increase anti-social use, a vicious circle as the ASB further discourages visitors.

Hosting the Camden Highline entrance in Camden Gardens will help mitigate these existing issues:

- Closure and securitisation of the park during construction works will discourage ASB. The post-construction changes in the layout and amenity of the park on reopening will help mitigate the return of the serious ASB the park currently experiences.
- Footfall to the Highline, and to the new amenities in Camden Gardens will vastly increase its use, providing increased natural surveillance and passive crime protection in the daytime. This will also help reduce the entrenched factor of the ASB.
- The Highline entrance will enclose two thirds of the open space within the arches, reducing the space available for ASB both day and night. The middle open arch will have the greatest visibility from the surrounding area, increasing the chances of public reports of night ASB as they occur.

The staircase extending out of the western arch is a deliberate design feature. From an amenity perspective it increases the visibility of the entrance from Water Lane, and allows for the visitor experience of crossing through the arch at height. From a crime deterrence perspective its location allows for easy observation, both from street-level and from the windows of the five-storey building at 47 Kentish Town Road.

The London Borough of Camden will retain management and control of Camden Gardens. They may decide, through their own processes to increase the fence height, which would further contribute to the security enhancements delivered through the Highline scheme. It may be sensible to review the improvement brought by the Highline entrance before deciding if this investment is required.

The Camden Highline are open to modifying the design to make the furniture in the central arch demountable.

Camden Gardens is already a hotspot for crime and ASB. The Highline entrance will enhance the security of Camden Gardens through increased natural surveillance. It will be a net gain and help mitigate these issues. As such we propose no significant design changes.

4.	Lighting should be designed to achieve BS 5489-1 2020 and to be complimentary to any proposed CCTV system.	No CCTV is proposed for the Camden Highline. The BS 5489-1 2020 standard is guidance for road lighting and other areas which are publicly accessible outside of daylight hours. The Camden Highline will be closed at night.
5.	Recommend two dedicated security personnel to secure the site and undertake emptying at close.	The Camden Highline's layout and design affords it passive crime protection unique to elevated linear parks: - It will be busy, providing passive surveillance across the entire park during its hours of operation.
6.	The Highline will be obscured from general police patrol, so needs good lines of sight, lighting and few areas of concealment of persons, weapons or drugs.	- It's an elevated park/walkway with two access points and no way to exit the park elsewhere. Regents Park has 16 in comparison. Combined with the high footfall, this limit of escape routes makes crime less appealing on the Highline. - Its linear and narrow nature means lines of sight are clear and there are few opportunities for concealment. - Due to these factors, we believe that the current on-site staff will be able to undertake clearance of the highline at closing.
8.	With the entrance onto the railway at this site as well who will take responsibility for crime in this area? Will it fall to British Transport Police or Metropolitan Police? This could become confusing and lead to a possible delay in response times to an incident.	A direct entrance from Camden Road station isn't part of the Highline proposal, so we believe that responsibility for the park will lie with the Metropolitan Police and there is little risk of confusion.