

St Pancras Parochial Church Council,

c/o Rev Anne Stevens, Vicar

St Pancras Church, Euston Road,

London NW1 2BA

8th June 2014

Dear Ms. Stevens,

The Camden Civic Society was asked by your churchwarden, Dorothea Hackman, to write to the PCC in response to Camden's planning policy document, the Euston Area Plan, and to do so particularly from the point of view of Heritage. We are very glad to be able to work with the PCC.

We discussed the EAP at our committee meeting on 5th June and send this letter and its appendices to be submitted by you as part of your evidence to the forthcoming Inquiry. As the committee member most involved in this area of Camden, I was deputed to prepare our documents: this letter plus three attachments – list of sound and unsound points, file of photographs, file of maps.

Just to introduce myself, I have lived all my life in Park Village East, which is at the northern end of the area defined by the EAP. Park Village East now lies outside the limits of the modern parish but I visit St Pancras quite often as a sing in a choir, the British Museum and British Museum Singers, which regularly gives concerts there. When my parents were still living in Heathcote Street, my older sister was baptised at St Pancras. I have inherited from my parents a folio book, Henry William Inwood's *The Erechtheion at Athens...*, of 1827. This contains life-size engravings of many of the architectural details used by Henry Inwood and his father William at St Pancras and at All Saints, Camden Town.

The Camden Civic Society has not itself formally commented on the EAP but I responded to an early consultation as an individual (I have not so far been able to find a copy of what I sent). The Civic Society however has petitioned the House of Commons in opposition to the HS2 bill, as I have done myself as an individual; the time and effort taken up by HS2 has meant, I am sorry to say, that we were not up to date with the progress of the EAP and the Inquiry deadline took us unawares.

As far as we can recall, the Camden Civic Society was never contacted directly by Camden about EAP; we are at least pretty sure we were never sent a copy of the draft or current document.

The EAP as it now stands is a tremendous disappointment. It seems to us that Camden is leaning far too far to accommodate HS2: although at least two alternative schemes to HS2 – Double Deck Down and Euston Cross - have shown it is unnecessary to take the extra land which HS2 is demanding, the EAP meekly follows HS2's land grab, accepting the demolition of the four blocks along Granby Terrace and to the west of Hampstead Road bridge as well as the absorption of one whole block – between Melton Street/Cardington Street and Cobourg Street – into the new station.

The EAP is also very far from adequate in its assessment of listed buildings and conservation areas. Like HS2's much criticised Environmental Statement it seems to be talking down what is good and valuable in the area. It does this partly by excluding any consideration of listed buildings immediately outside the lines arbitrarily drawn as the boundary of the "Euston Area". For example, my own and my neighbours' houses in Park Village East, designed by John Nash and listed II*, are not mentioned and certainly are not considered in terms of their setting, even though planning law requires that the "setting" of listed buildings and of conservation areas be taken into account when making planning decisions.

The EAP also simply dismisses as "dated" p.23 what is good at the current Euston station. The Camden Civic Society in its HS2 petition suggested that the reason the 1960s station has always been unpopular is because people were so shocked and upset by the demolition of the old station buildings. It is true that the current train shed takes functionalism to a low point, and we have no objection to new buildings of moderate height over this. But the main hall would be a fine space if treated to the de-cluttering just applied to King's Cross; the same is true of the exterior space around the four Richard Seifert immediately to the south – if the "penetration" is poor this is because the railway authorities have allowed commercial outlets to take up every available nook and cranny. The Seifert buildings themselves, of moderate size and well-detailed using good materials, we feel are much more thoughtfully scaled and placed than what the EAP wants us to be offered in their place.

The EAP is also weak in its assessment of open space and trees, both due to be greatly reduced, at least in the short term, if HS2 ever arrives here. A good example is the open space that is currently very liberally provided within Camden's Regent's Park Estate which the EAP describes dismissively as "pockets".

We also note that what the EAP states in relation to Euston's local transport links – that they are "excellent" (pp.14 and 26) – contradicts the position of Camden Council in response to HS2. And in July 2013, in their formal response to the HS2 ES, the Transport Committee of the London Assembly has written as follows: "*Euston Underground station already experiences overcrowding at peak periods and this will only worsen with the introduction of HS2. Westminster Council is also concerned about a lack of capacity on buses and the underground at Euston to deal with the dispersal of many more passengers. We maintain our view that the construction of HS2 should not proceed without Crossrail 2.*" The Camden Civic Society is particularly concerned that the extra road traffic due to be generated by HS2 will further slow down buses which pass by Euston.

One particularly worrying aspect of the EAP is the claim that it will "reinststate the historic Euston area street pattern". In fact what is proposed under this heading (Figure 3.5) is an invention, with no basis in history. The proposed extension of Park Village East instead appears to have the aim of delivering road traffic neatly to HS2's planned vehicle entrance to the station, to be created in place of St James's Gardens. This will completely change the character of Park Village East, assessed by HS2 currently as follows (11.4.2): *The area is predominantly residential and traffic flow along Park Village East is light.* This uncalled-for gift to the road lobby will also involve the demolition of further perfectly pleasant blocks on the Regent's Park Estate.

Lastly, our impression is that the overall aims of the EAP, to bring greater vibrancy (*vibrant* occurs 18 times in the EAP) and to "regenerate" the area (*regenerate/regeneration* occurs 22 times), are not shared by the great majority of its residents. In its role as a member of the HS2 Euston Area Action

Group, the Civic Society has been helping local residents with their petitions. Overwhelmingly we hear that people like the peace, relatively human scale and openness of the built environment as it presently exists, at least to the west of Euston and the mainline.

The type of very large scale development the EAP envisages – with the number of housing units increased from around 1,000 as envisaged in the current London Plan (EAP p.12) to 2,800-3,800 (p.34) in this EAP, will help to reduce housing pressures. But the kind of commercial development which we can be sure would accompany any new housing is neither needed nor wanted.

We are aware that within Camden's housing and that of the old St Pancras Housing Association (now Origin) there is a relatively high level of deprivation. But since the overall economy of London has been extremely buoyant for the last twenty years or so, and the Euston area is close to a great many sources of employment, we suggest that what these deprived families need is not further commercial exploitation under the heading of "regeneration". The existing housing stock itself is fine, as long as properly maintained. If already properly housed, what such people need is help with long term problems such as disability, drug dependency, poor education, and poor language skills. This development-friendly planning policy document is not the way to deliver such help to them.

Yours sincerely,

Hero Granger-Taylor, committee member,

on behalf of Camden Civic Society,

my address: 22 Park Village East, London NW1 7PZ, 0207387 1731

CCS address: 32 Hillway, N6 6HJ

What is Sound and Unsound in Camden's Euston Area Plan,

Comments from Camden Civic Society on behalf of St Pancras Parochial Church Council 9/6/14

We accept as sound the following:

A. Views, discussion of, p.23, fig. 3.4 p.50. This is an important aspect to Euston so far more or less ignored by HS2. Respecting long distance views mean that local views are also maintained, as in the view of St Pancras church tower from St James's Gardens.

B. Desire to open up routes across the station and crossings over Euston Road and other major thoroughfares. The lack of east-west routes in the area of Euston is in the Civic Society's view the worst aspect of the present Euston station.

C. Control of pollution. This is an aim that everyone can agree with.

We find the following, relating in particular to Heritage, unsound:

A. The outline of the area as defined in the document, especially in Figure 2.3. This is acceptable at the southern end but must be expanded at the north to take in the many listed buildings immediately adjacent, the settings of which will be affected. This means Park Village East, Parkway, Mornington Terrace and the southern end of Mornington Crescent.

(St Pancras Church itself and the buildings immediately south of Euston Road, is at least included the outline.)

The subdivision of the overall EAP into character sub areas is misleading. These areas are too small to really have their individual characters – for example, Euston Road is much longer than what is covered here. Their names should be replaced by numbers. In particular "North Euston Cutting" should be changed: residents here have never defined themselves by their proximity to the railway though they have been forced to think about this in response to HS2 and now use the term "Camden Cutting".

"West Somers Town" is historically the area here defined as Drummond Street and Hampstead Road and is therefore also problematical; an identifying number would solve this problem.

B. The Camden Civic Society, in its petition to Parliament against HS2, has described the area we define as mid-Camden as an unusual mix of major transport infrastructure and streets which are dominated by housing: the EAP is unsound in playing down very important proportion occupied by housing. This is something the document should emphasise. People living here do not want their streets to become "vibrant" or to be "regenerated" and very much appreciate the quiet and open aspect of so much of the area, much of the openness being provided by the low height of the station and the cutting to its north.

C. The EAP is very unsound in accepting the large land grab that HS2's current plans will involve (p.5). At least two alternative schemes – Double Deck Down and Euston Cross – do not require land to be taken on the surface. Camden, TfL and the GLA are far too submissive in accepting this and the huge amount of demolition and disruption it will cause. In its petition to Parliament, Camden has in

fact asked that HS2 stop at Old Oak Common until better plans for Euston can be evolved. So in this respect the EAp is already out of date.

All the plans and estimates should be revised so as to be based on the existing station and railway footprint.

D. At Figure 3.5 new roads are shown which are said to “reinstate the historic Euston area street pattern”, a claim with no basis in fact. The actual original street layout is shown in contemporary maps, e.g. Bartlett’s 1834 map of St Marylebone. The need for these new roads where they extend beyond the footprint of the station itself needs to be argued and has not been so. The extension of Park Village East, for example, would lead to a great increase in traffic.

E. Many terms used are not compliant with the statutory planning duties of the local authority/authorities. We understand Bloomsbury CAAC is dealing with this point in particular but would point out ourselves the very limited use of the term “preserve” and its apparent replacement by “complement” as on p.4 “complements the character and heritage of the area”. Where heritage and listed buildings are discussed, the word “preserve” must be employed.

F. Listed Buildings, Conservation Areas and buildings on the Local List are given too little weight. Most obviously, Bloomsbury CA, part of which comes well within the EA, is not mentioned until p.80. Nash’s villas in Park Village East, the earliest and most influential of which survive intact (nos 6, 8,10,12, and 14, as in the Thomas Shepherd print of 1827), are largely ignored. The nonsensical paragraph on p.19 *“Park Village East and Mornington Terrace/ Clarkson Row bound this character area. Both streets are characterised by listed residential properties and are respectively within Regent’s Park Conservation Area and Camden Town Conservation Area, and therefore provide a sensitive setting to railway lands.”* This needs to be changed to “require their setting to be taken into account when any new developments are planned. Park Village East, with John Nash’s Grade II* villas is particularly sensitive”. (NB there is no “railway land” here.)

G. The case for the redevelopment of the station should not be put forward on the basis of a negative description of the current station. We need to hear something much more definite than it will be “world class”.

H. The document also downplays the current areas of open space. For example, the very spaciouly planned Regent’s Park Estate is described insultingly as having “pockets” of green, where in fact much of the open space is interconnected. This, like the treatment of Listed Buildings, is a whole aspect of the document which needs to be revised.

Hero Granger-Taylor, for Camden Civic Society, 8/5/14

Hero not to forget:

Accepting HS2's land take, p.5 and "higher levels of growth" also p.5, huge number of new homes, p.12 v. p.16

Local transport not at present excellent p.14 (Crossrail 2), p.26

Vibrant v. Essentially residential (p.46, implies wants vibrant for the whole area).

Very poor treatment of "heritage" , BCAAC not mentioned until ? p.?, not in section on Euston Road, p.23 CAACs and squares not listed, p.51, new development "complementing local character and scale"

No mention Of Nash or Grade II* villas. P.19 or p.86

Why PVE and M Terrace not included in area? If railway decked over, will be on the same level. Park at northern end just not going to happen.

This area not characterised by railway. Naming it after cutting will not make this the case.

v. confusing description of PVE and m Terrace

Poor treatment of green spaces, "pockets" in RPE. P.20, St James's Garden, recovering from old poor reputation, p.125 development sites, out of date.

wrong roads, p.3 "clear and convenient streets", p.46 reinstating teh historic Euston area street pattern

views preservation makes open space above station from all directions

SoSs decision on Inmarsat application.

Euston Buildings – negatively impact p.18, p.22 front of station incorrectly designated as "blank" wrong building identified as intruding into views, "dated" p.23, Euston arch, p.?, only if enough space, and

HS2 not working with Camden Council, p.24, out of date

Sound – A, B,

A. Views – doc at least mentions them p.23, fig. 3.4 p.50, nothing higher than 10 stories

B. Crossings across station for people not using station, crossing Euston Road, better access for pedestrians and cyclists

C. Pollution

D. Consultation responses, e.g. p.23, but no indication that will abide by local people's wishes, p.117,

Unsound – A, B,

A. Contradictory and nonsensical statements – p.2 “image and connections” sic

Hero can do some of this.

B. Statutory duties - does not talk about preserve and enhance until much later in document.

Leaving this to Tony.

On p.4, has “complements the character and heritage of the area”

p.51 “complements local character and scale”

p.16 High quality design which preserves and enhances the area's heritage –first appearance of “preserve and enhance”

p.49 Where buildings currently detract from existing protected views, the consideration of the potential for redevelopment to contribute to the enhancement of these views will be encouraged.

p.51 These heritage assets play an important role in creating sense of place and development must preserve or enhance these assets through appropriate layout, scale and detailed design. Where possible, opportunities should be taken to enhance the historic character of the area through sensitive refurbishment of historic assets and new development and public realm works that enhance their setting.

p.74 Development should largely be limited to 10 storeys to protect and enhance the Mayor's strategic view corridors.

p.89 The design of new development and materials used should respect and enhance the character of the surrounding historic townscape

p.86 Development principle North Euston Cutting sic “Development proposals should be sensitive to the historic context and seek to preserve the setting of heritage assets through sensitive design and scale.”

C. Development strategy –

wrong to base it on HS2

HS2 may never come, or need not come in the form assumed here (much enlarged station and widened tracks);

p.5, The plan responds to the impact of the proposed High Speed Two (HS2) terminus at Euston
Boundary, how defined, and division into areas (West Somers Town sic) and what it excludes

D. Assessment of heritage assets especially setting of listed buildings and of conservation areas

E. Assessment of Euston station a

Horizontal form of Podium n.b. on front cover

p.xi, "transform Euston's image"

p.2 "area in front" of station

F. Assessment of open space especially Euston Square (compare with Park Crescent/Park Square)

G. New streets not on old street pattern p.ix

H. New buildings – world class architecture???

I. Consultation unsound, not least because too limited in terms of what is considered

p.4 original doc no longer available