

Euston Area Plan Examination

Matters, issues and questions for the Hearing sessions

Matter 5 Community Regeneration – EAP Team Responses

Question 5.1: Does the Plan effectively meet its first Objective of 'Prioritising local people's needs' and in particular by ensuring that homes, businesses, schools, community facilities and open space lost or displaced by HS2 are successfully reprovided?

- 5.1.1 It is considered that the plan effectively meets its first objective to prioritise local people's need and respond to the impacts of HS2 on local residents, businesses and facilities, in setting out a longer term planning framework to complement the more short term mitigation work being undertaken by Camden Council and HS2 Ltd, which will continue to develop through the Hybrid Bill process. Key ways in which the aims of EAP Objective 1 are addressed in the Plan are set out below.

Housing re-provision

- 5.1.2 There would be 216 (mainly affordable) homes lost as a result of HS2: the EAP therefore provides a planning framework for the delivery of replacement homes. Section 3.2 Land use strategy (Homes) sets out this approach, and states that priority will be given to housing re-provision sites (see EAP page 36).
- 5.1.3 Potential housing replacement sites are identified in Regent's Park Estate as an integral part of Development Principle EAP 5 (see also the inset plan on p99, which identifies potential re-provision sites marked 'A'). The whole of Regent's Park Estate is identified as an area for reprovided and new housing due to its proximity to the homes that would be lost, and the potential of the estate to accommodate infill homes. Further potential housing sites are also identified in Amptill Estate, which could be used as replacement homes if the timing of the construction of HS2 allows or if further infill opportunities in the estate are identified (see Development Principle EAP7).

Business premises

- 5.1.4 Up to 28 business premises would be lost as a result of HS2, as well as ongoing construction impacts. Strategic Principle EAP1 allows for up to 280,000 sq m employment floorspace (including replacement floorspace) to be provided at Euston, as well as significant new retail provision. Page 40 of the EAP states that, as part of this provision, priority will be given to smaller business spaces to replace existing businesses displaced due to HS2 construction, provided at initially discounted rates in new development where appropriate and feasible.

- 5.1.5 It should also be noted that compensation for displaced businesses will be provided as part of the statutory compensation code. A range of other short term measures (such as business support) are also being sought by Camden as part of the measures to be agreed through the HS2 Hybrid Bill process.
- 5.1.6 The EAP also provides support for remaining businesses that could be affected by HS2. In particular, the EAP places a strong emphasis on protecting and promoting Drummond Street neighbourhood centre, and reconnecting the street as an east-west link through Euston Station redevelopment.

Schools

- 5.1.7 Maria Fidelis Lower School is located adjacent to the main HS2 construction compound. There is also a long standing aspiration to consolidate the school with the upper school at Drummond Crescent. The EAP therefore supports the relocation of the lower school to Drummond Crescent prior to the start of construction activity to avoid unnecessary disturbance to pupils. See EAP sections 3.2 and 4.7 for further details.

Community facilities

- 5.1.8 The Silverdale Tenants' Hall is located within the proposed footprint of HS2. Section 3.2, page 44 of the EAP [as proposed to be amended] refers to mitigating the loss of Silverdale tenants' hall through HS2 working with Camden Council to re-provide it in an appropriate location. The detailed approach to the mitigation of Silverdale Tenants' Hall is to be determined through the HS2 Hybrid Bill.

Open Space

- 5.1.9 HS2 would result in:- i) the loss of the entire St James's Gardens during construction and the permanent loss of a significant portion of the gardens following construction; ii) the permanent loss of Hampstead Road open space; and iii) the temporary loss of other spaces (such as Euston Square Gardens) during construction. The EAP identifies a potential location for replacement open space on the current Maria Fidelis school site, after it is vacated by the school (see *Schools* above) as it is located adjacent to St James's Gardens, and considered to provide a highly appropriate replacement in terms of scale, form and location. The EAP also promotes the provision of a larger new open space on the northern part of the North Euston Cutting, subject to funding availability.

Question 5.2: How will the Plan secure the delivery of major new social infrastructure assets that are identified to meet the needs of new and existing communities?

- 5.2.1 Strategic Principle EAP1 of the Euston Area Plan states that "*Education, health and other community facilities should be provided to support new development and reflect*

local priorities and needs". Developments would therefore be required to provide new, or contribute towards, improved community facilities as appropriate through Section 106 agreements and/ or CIL payments, as appropriate.

- 5.2.2 Key social infrastructure assets that are identified in the Euston Area Plan are set out below, along with details of delivery.

Health provision

- 5.2.3 The detailed nature of health provision to be determined at the planning application stage, when the extent of need generated and health provision context at the time is known.
- Financial contributions towards enhancements to/ increased revenue costs for existing health facilities would be secured through Section 106 contributions and/ or Community Infrastructure Levy (CIL).
 - Any new health facilities would be sought as part of mixed use developments, to be secured through Section 106 agreements.

Education: primary school provision

- 5.2.4 Up to 4-5 forms of entry will be required to meet demands created by potential housing growth identified in the EAP, to be provided for as follows:
- Proposed new two form of entry school on the North Euston Cutting site: this would be delivered as part of the North Euston Cutting development and provision would be secured as part of a Section 106 legal agreement. A financial contribution towards provision would be also secured from development on Euston Station and Tracks site.
 - Additional primary school provision, where needed, could be delivered through the expansion of existing schools, or the delivery of an additional school as part of mixed use development (to be determined as the scale of future development is better known):
 - Expansions of existing schools are likely to be delivered by Camden Council, potentially managed as part of its Community Investment Programme. For example, as part of its Somers Town Community Investment Programme, Camden is currently working with the local community to develop proposals for the redevelopment of Edith Neville Primary School.
 - If the need for a new primary school is identified, delivery could be funded through Section 106 and/ or CIL funding. Under current legislation, local authorities cannot open their own new schools and there is a presumption by the Department for Education that any new schools will be Academies/Free schools. The approach to delivery of any new school(s) would therefore be subject to the detailed nature of proposals as they came forward.

Public open space

5.2.5 The EAP proposes the following new open spaces in order to meet the needs of existing and new communities:

- **Maria Fidelis Lower School site:** it is anticipated that the Maria Fidelis Lower School site will be vacated prior to the start of construction works for HS2. The EAP therefore proposes the provision of a new open space on the site following vacation to replace open space lost as a result of HS2. HS2 Ltd is assisting Camden Council with this. However, if appropriate replacement open space can be delivered elsewhere in the area, or if a smaller footprint station redevelopment is progressed, the Maria Fidelis site would be appropriate for housing led mixed use development, if the school is still relocated.
- **North Euston Cutting (southern, smaller open space):** The EAP proposes a new open space as part of the North Euston Cutting development, which is shown adjacent to the proposed site for a new school and secured through a Section 106 agreement
- **North Euston Cutting (larger open space to north):** the EAP also encourages the provision of a larger open space above the railway tracks on the northern part of the North Euston Cutting, if funding can be secured. It is anticipated that this would come forward alongside the construction of HS2 and adjacent development in order to meet the needs of the additional development. Funding for this may be sought from a range of sources, including HS2 Ltd/ Network Rail; other Government sources; and Section 106 and/ or CIL payments.

North Euston Cutting

Question 5.3: Does Development Principle EAP3 and the accompanying illustrative masterplan at Figure 4.4 provide the right framework for the regeneration of this area, in the context of its location between two Conservation Areas?

- 5.3.1 The EAP proposes housing-led development and significant open space on the North Euston Cutting in order to make better use of currently under-used land. The Euston area is considered to be an appropriate location for the provision of housing; given its growth area designation, central London location and excellent public transport accessibility as well as the potential to contribute towards Camden's pressing need for new homes. It is essential to ensure that any potential development is planned for now, so that engineering works associated with the railway can facilitate development.
- 5.3.2 Until the turn of the 20th Century, housing lined both sides of the railway (i.e. on the east side of Park Village East and the west side of Mornington Terrace). Works to enlarge the railway cutting in 1900-1906, involved the demolition of housing on either side of the original cutting. The Conservation Area Statement for Camden Town

(document CG5) notes the townscape harm caused by the creation of the current open cutting area:

“At the west end [of Delancey Street], there is a sense of openness, at the expense of the townscape, due to the demolition of houses to allow for the widening of the Euston railway cutting at the turn of the last century.”

- 5.3.3 The introduction of new development above the cutting is therefore considered to be appropriate in terms of historic context, provided that the scale and form of development is sensitive to this context.
- 5.3.4 The building heights proposed for the North Euston Cutting (see Figure 3.4 of the EAP, page 50) seek to respond to the conservation area context of the area, with taller buildings (9-10 storeys) towards the south, where larger scale buildings predominate, stepping down to provide lower buildings (up to 4 storeys/ 5-6 storeys) to the north, to respond to a finer grain, historic context.
- 5.3.5 In response to community concerns made in relation to the draft Euston Area Plan (July 2013), additional text was added to the proposed submission version of EAP to ensure that full consideration is given to the impact of any development on the surrounding built and heritage context (see Design text, page 89).
- 5.3.6 The EAP seeks to maximise the provision of open space above the railway cutting and has been amended (since the July 2013 draft EAP) to place a stronger emphasis on providing a larger open space to the northern end of the cutting, as well as proposing to integrate open space within housing development to the southern end of the cutting.
- 5.3.7 It is therefore considered that the EAP provides the right framework for the regeneration of this area, providing an appropriate balance of housing and open space, whilst seeking to ensure that development responds to its sensitive historic location in terms of form and scale.

Drummond Street and Hampstead Road

Question 5.4: Does Development Principle EAP4 and the accompanying illustrative masterplan at Figure 4.5 secure the protection and enhancement of this area as a neighbourhood centre?

- 5.4.1 The Euston Area Plan seeks to provide a long term planning strategy for the protection and enhancement of Drummond Street as a neighbourhood centre and an attractive townscape. In addition to these longer term measures, Camden Council will seek to work with HS2 Ltd to develop a range of mitigation measures to protect and maintain the vitality and viability of the street during HS2 construction, and is petitioning the HS2 Hybrid Bill to seek to ensure appropriate mitigation measures are

secured, as current measures set out in the Bill/Environmental Statement are not considered adequate.

5.4.2 Key measures identified in Section 4.4 of the EAP include:

- Reconnecting Drummond Street with the station and communities to the east by seeking a through-route to and from Drummond Street as part of new station design;
- Maintaining and respecting prevailing building heights and scale and ensuring that ground floor retail units reflect the fine grained nature of the street;
- Encouraging shopfront enhancements and supporting refurbishment works to reverse inappropriate alterations to otherwise attractive buildings;
- Provision of public realm improvements to Drummond Street;
- Seeking to manage potential harmful increases in traffic movements through appropriate traffic management measures. In response to concerns from the Drummond Street Traders Association regarding the need to preserve the street as a through-road, the EAP team has suggested the following change to the proposed submission EAP:
“Public realm improvements will be sought for the area including Drummond Street, Euston Street and Stephenson Way. In association with this, Drummond Street/Euston Street will be designed as a pedestrian and cycle friendly place with a high quality public realm and appropriate traffic management measures to make it a successful and vibrant place ~~will be given pedestrian priority with through traffic restricted.~~”
- Seeking to prevent further loss of ground floor retail units unless justified on viability grounds, whilst providing support for additional food and drink uses; and,
- Application of flexibility in relation to applications for ‘meanwhile uses’ during the construction of HS2.

5.4.3 These measures together provide a framework to protect and enhance Drummond Street as a neighbourhood centre, building on existing strengths to take opportunities that may arise out of the redevelopment of Euston Station whilst seeking to minimise potential negative impacts. In terms of the delivery of public realm improvements, revised wording to address HS2 representations is set out in Schedule EAP 6.1 pages 10 and 11 and have been agreed in principle by HS2 with minor amendments to be set out in a Statement of Common Ground.

Regent's Park Estate

Question 5.5: Does Development Principle EAP5 and the accompanying illustrative masterplan at Figure 4.6 successfully address the impact of HS2 construction upon this area, including the provision and re-provision of social infrastructure?

- 5.5.1 The key impacts on Regent's Park Estate arising from HS2 relate to the loss of housing, open space, and the Silverdale Community Hall, as well as noise and disturbance during construction.
- 5.5.2 **Loss of housing:** 191 homes in the Regent's Park Estate (of which 128 are social rented) are within the HS2 safeguarding area. The EAP therefore identifies a number of infill sites (marked 'A' on the inset plan on p100 of the EAP), which would provide capacity for 130 replacement social housing units, as well as identifying the estate as being an area for potential further housing infill.
- 5.5.3 To provide assistance to affected leaseholders, the EAP [as proposed to be amended in response to HS2 comments] is proposed to state that *"As part of the additional housing provision through infill and renewal sites in existing housing estates... Camden Council will seek to make additional intermediate and private housing delivered in the Euston area available for potential purchase by leaseholders who will lose their homes as a result of HS2"*. (pages 8 and 9 of document EAP 6.1)
- 5.5.4 The living environment in housing blocks adjacent to the HS2 safeguarding area is likely to be affected. The EAP therefore indicates a potential layout for replacement housing in this area (marked 'C' on the inset plan on p100 of the EAP), if redevelopment is considered necessary. However in order to address HS2's representation, revised wording to clarify the process for determining impact of the HS2 project has been agreed (see page 12 of document EAP 6.1).
- 5.5.5 **Loss of open space:** Hampstead Road Open Space would be lost as a result of HS2. In addition, the provision of replacement housing in Regent's Park Estate would lead to the loss of some undesignated open space on the estate. To help address these impacts, the EAP seeks the provision of an estate-wide open space strategy (see page 102) to accompany the provision of infill development.
- 5.5.6 **Loss of Silverdale Tenants' Hall:** the approach to the mitigation of Silverdale Tenants' Hall is to be determined through the HS2 Hybrid Bill, and if physical re-provision is agreed, then this could be accommodated as part of mixed use development as appropriate in the Euston Area. Revised wording to address HS2 representations are set out in Schedule EAP 6.1 pages 19 and 20 and have been agreed in principle by HS2.

Amphill and Mornington Crescent Station

Question 5.6: Does Development Principle EAP6 and the accompanying illustrative masterplan at Figure 4.7 provide the right framework for development in this area particularly in the context of identifying sites for short term development?

- 5.6.1 Development Principle EAP 6 seeks to take opportunities for public realm works and new development to enhance the accessibility, legibility and local environment in the area, and to secure new infill housing to address housing needs/replacement housing requirements. The comprehensive framework approach is considered appropriate.
- 5.6.2 Key measures include the use of proposed new development to provide more active frontages and enhance legibility around Amphill Estate, and enhancements to the setting and accessibility of Harrington Square, which is currently subject to severance caused by the surrounding road system.
- 5.6.3 The supporting text also seeks to balance legibility and accessibility improvements with “ensuring safety and security of residents is not compromised” (page 106, under ‘Reinstating the historic street pattern’). This was added following comments received on the draft EAP, which highlighted that the need for new housing should be balanced with the need to consider security issues.
- 5.6.4 The proposed development blocks at Amphill would also help to enhance community safety by providing overlooking of existing and new public streets and spaces.
- 5.6.5 The proposed blocks shown in Figure 4.7 are likely to be bought forward in the longer term or, if the need is identified and delivery can be bought forward in part (where not needed for HS2 construction), could deliver new homes in the short term to replace those lost as a result of HS2. There may also be further infill opportunities here, which would need to be explored with residents.

West Somers Town

Question 5.7: Does Development Principle EAP7 and the accompanying illustrative masterplan at Figure 4.8 provide the right framework for development in this area, particularly in respect of the renewal/intensification of the Churchway Estate and the enhancement of Eversholt Street?

- 5.7.1 Development Principle EAP7 seeks to ensure that the redevelopment of Euston Station is accompanied by appropriate measures to enhance the surrounding environment, and connectivity with St Pancras and King’s Cross to the east whilst also requiring impacts on local residents to be minimised. It also provides a

framework for wider change in the area, for example the provision of a consolidated Maria Fidelis School site, and enhancements to Chalton Street market.

- 5.7.2 As part of its wider Community Investment Programme work, Camden Council will assess whether there may be the potential to deliver additional homes on Churchway Estate through redevelopment, in consultation with local residents. However, no decisions regarding the future of Churchway have been made therefore the EAP seeks to acknowledge this wider investigative work. However in the meantime, revised wording to address the potential loss of the playground at Churchway due to the HS2 project has been agreed with HS2, and is set out in document EAP 6.1 at page 12.
- 5.7.3 Eversholt Street currently suffers from a relatively poor environment due to the long blank façade provided by the eastern flank of Euston Station. The EAP seeks to ensure that a redeveloped Euston Station includes a significantly enhanced active ground floor frontage on the western side of Eversholt Street.
- 5.7.4 The EAP seeks significant public realm improvements to Eversholt Street in order to provide for, and mitigate, onward movement from the station, and to allow the street to meet its full potential to provide an attractive north-south route and commercial hub.

EUSTON AREA PLAN EXAMINATION 1ST AND 2ND JULY 2014HIGH SPEED TWO (HS2) LTD STATEMENT

MATTER 5:-

1. Subject to the changes agreed with Camden Council and set out in the HS2 Ltd/Camden Council Statement of Common Ground HS2 Ltd is not seeking any changes to the Euston Area Plan (EAP) related to the matters set out below. The intent of this statement is to assist the Inspector with his consideration of the EAP.

COMMUNITY REGENERATION

Does the Plan effectively meet its first Objective of 'Prioritising local people's needs' and in particular by ensuring that homes, businesses, schools, community facilities and open space lost or displaced by HS2 are successfully reprovided?

2. Prior to responding to the question it is necessary for HS2 Ltd to point out a substantive error in the question. No schools will be lost or displaced by the High Speed Two (HS2) works at Euston. The Statement of Common Ground agreed by HS2 Ltd and Camden Council does not attribute the relocation of the school to the HS2 works.
3. The High Speed Rail (London - West Midlands) Bill (henceforth 'the Bill') seeks the powers necessary to construct and operate phase 1 of High Speed Two (HS2). It is the Parliamentary process that will settle the principles of mitigation (and that the detail of plans for that mitigation will be the subject of approval by the local planning authority where required), following consideration of petitions. It is not the role of the EAP to prescribe how HS2 should be mitigated or set requirements in this regard. HS2 has reported the significant environmental effects of the scheme in the HS2 Environmental Statement (ES), it is therefore neither

appropriate nor necessary for the EAP to provide an assessment of, or speculate on, the effects of HS2.

4. In addition to mitigation relating to replacement or re-provision, the nominated undertaker designing and constructing HS2 will be bound by various obligations relating to the mitigation of the significant environmental effects of HS2. Through the provisions of the Bill and other controls such as the HS2 Environmental Minimum Requirements (EMRs) a comprehensive and binding range of controls will be imposed on the project.¹ These controls and requirements put in place the framework through which the environmental effects of HS2 will mitigated and managed.
5. HS2 Ltd considers therefore that the role of the EAP in regard to mitigation should be to create a positive planning framework which will facilitate the delivery of mitigation where it requires permission under the Town and Country Planning Act or provide policy that will be material to the determination of requests for approval under Schedule 16 to the Bill insofar as it is material to the matter for approval and the relevant grounds.²
6. The EAP does this with planning policy supportive of the provision of the replacement housing for social rented flats that will be demolished to enable the construction of HS2 (Development Principle 5). This approach supports the statement in paragraph 5.4.48 in HS2 ES Community Forum Area report regarding the replacement of social housing in the Euston area. HS2 Ltd continues to work with Camden Council to achieve this replacement housing.
7. Similarly, the text on open space and the Old Tenants' Hall at Silverdale provide positive policy for the provision of mitigation. As stated above the nature and scope of that mitigation will be

² See HS2 Information Paper B1: THE MAIN PROVISIONS OF THE PLANNING REGIME (http://assets.hs2.org.uk/sites/default/files/hb_pdf/B1-Main%20Provisions%20of%20the%20Planning.pdf)

determined through the Parliamentary process. The HS2 EMRs referred to above include commitments in relation to open space and HS2's policy on the mitigation of significant effects on open space and community facilities is set out in HS2 Information Paper E6³. HS2 Ltd continues to work with Camden Council to achieve the implementation of appropriate mitigation, especially where the mitigation is outside Bill powers and is on Camden Council's land and/or may require planning permission from the Council.

8. With regard to effects on businesses the measures set out in the HS2 Code of Construction Practice will ensure that appropriate measures are taken during construction that will assist business continuity. These combined with the policies set out in the HS2 Information Papers such as C7 Business Relocation and D11 Maintaining access to residential and commercial property during construction, put in place the policies required to appropriately mitigate the effects of HS2 during construction. Further to this HS2 Ltd is continuing to discuss the local implementation of mitigation in the Euston Area with Camden Council.
9. HS2 therefore believes that the EAP provides policy that is supportive of mitigating the effects of HS2 and thereby supporting local communities while recognising the limitations of local planning policy in regard to HS2 (subject to the agreement of the changes agreed between HS2 Ltd and Camden Council and set out in the Statement of Common Ground). To make the plan more prescriptive would be to make it unsound as it would not be effective as it is not the role of an area action plan to set the mitigation requirements for a scheme authorised by a hybrid Bill, rather this role rests with Parliament as the planning authority for HS2.

³ See HS2 Information Paper E6: MITIGATION OF SIGNIFICANT COMMUNITY EFFECTS ON PUBLIC OPEN SPACE AND COMMUNITY FACILITIES http://assets.hs2.org.uk/sites/default/files/hb_pdf/E6-Mitigation%20of%20significant%20community%20effects%20on%20public%20open%20space%20and%20Community%20Facilities.pdf

How will the Plan secure the delivery of major new social infrastructure assets that are identified to meet the needs of new and existing communities?

10. HS2 Ltd has no comment to make on this question.

NORTH EUSTON CUTTING

Does Development Principle EAP3 and the accompanying illustrative masterplan at Figure 4.4 provide the right framework for the regeneration of this area, in the context of its location between two Conservation Areas?

11. HS2 Ltd considers that Development Principle EAP 3 sets an appropriate framework for development over the cutting that contains the Euston Station approaches.
12. With regard to the statement on noise in this section of the plan “any decking over the tracks should be designed to assist in minimising noise from the trains below” HS2 Ltd wishes to make two points. Firstly HS2 assessed and reported the noise effects of the project in the HS2 Environmental Statement and has set out in the relevant HS2 Information Papers appropriate policies in regard to operational noise from the railway. In light of these HS2 considers that no further noise attenuation would be required. Also, any deck constructed using the powers in the Bill would require the necessary approvals from Camden Council under the planning regime established by Schedule 16 to the HS2 Bill referred to above.
13. The provisions of clause 2 of the Bill, subject to the relevant Bill limits and the requirements of clause 19 to the Bill, provide the powers to construct a deck to support development over the cutting. However such a deck does not form part of the HS2 proposals in the Euston Area as it is outside the remit of the project. Should such a deck be added to the HS2 proposals then Development Principle EAP 3 will provide appropriate guidance.

14. HS2 Ltd supports the recognition in the plan of the significant cost and technical constraints associated with decking over the railway.

DRUMMOND STREET AND HAMPSTEAD ROAD

Does Development Principle EAP4 and the accompanying illustrative masterplan at Figure 4.5 secure the protection and enhancement of this area as a neighbourhood centre?

15. HS2 Ltd has no comment to make on this question.

REGENT'S PARK ESTATE

Does Development Principle EAP5 and the accompanying illustrative masterplan at Figure 4.6 successfully address the impact of HS2 construction upon this area, including the provision and re-provision of social infrastructure?

16. HS2 Ltd's overall position regarding how the plan addresses to the provision of replacement housing is set out above in paragraph 6 and regarding community facilities and open space in paragraph 7. HS2 welcomes the identification of sites for potential replacement housing in the plan as this will assist with the process of providing the housing which will be subject to the normal Town and Country Planning Act process.

AMPTHILL AND MORNINGTON CRESCENT STATION

Does Development Principle EAP6 and the accompanying illustrative masterplan at Figure 4.7 provide the right framework for development in this area particularly in the context of identifying sites for short term development?

17. HS2 Ltd has no comment to make on this question.

WEST SOMERS TOWN

Does Development Principle EAP7 and the accompanying illustrative masterplan at Figure 4.8 provide the right framework for development in this area, particularly in respect of the renewal/intensification of the Churchway Estate and the enhancement of Eversholt Street?

18. HS2 Ltd has no comment to make on this question.

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6 June 2014