

**REGENT'S PARK CONSERVATION AREA ADVISORY COMMITTEE
12A MANLEY STREET NW1 8LT**

5 October 2013

London Borough of Camden
Place Shaping Team
Camden Town Hall

By email

Dear Euston Area Plan Team,

Draft Euston Area Plan – consultation response

The Advisory Committee discussed the current draft plan in detail at its meeting on 5 August 2013, again at its meeting on 2 September 2103, and in subsequent further discussions. This response was circulated in draft to Committee members for comment and approval before submission. Our comments are mainly focussed on the North Euston Cutting section of the draft plan.

1. The principle of the HS2 project

The Advisory Committee strongly supports Camden Council's fundamental opposition to the HS2 project. Nothing in this response implies any acceptance of HS2.

2. The principle of decking over the North Euston cutting

2.1 We are yet to be persuaded that this is acceptable in principle. We think it mistaken to assume that the decking is possible as shown in the draft, particularly given uncertainty over levels of the new section of the Hampstead Road. If the Plan is to be effective in guiding development it needs to be soundly based: at present in this respect it is not, and so starts with a fundamental flaw which may make other aspects of the plan non-viable.

2.2 If this key issue can be resolved, there are other issues on which the plan should set clear parameters. For example, at what point would the deck end at its north-western extremity? The end of the deck will itself be a major element in the townscape. How will it relate to the cutting retaining walls? How will it relate to Mornington Bridge? We know from experience in Regent's Place that master plans can be remarkably ineffectual if they do not address fundamental issues like these.

2.3 What will the impact of the decking have on the local environment? For example, what noise issues are there at its north-western edge – where trains will emerge into the open? Will there be light pollution at that point?

2.4 The draft Plan addresses viability and funding at p. 89. It should be made absolutely clear that, if decking is accepted in principle, its full cost will be borne by HS2 as mitigation. If this is not agreed at the earliest possible stage, all the well intentioned development proposals in the draft Plan will become effectively non-viable, or, at least, will be vulnerable to significant modification and downgrade.

2.5 These issues need to be resolved before the principle of decking is incorporated into the Plan.

3. Development on the deck

3.1 While there are well-intentioned statements of principle in the draft they are not carried through in the rest of the document. For example, we welcome the statement (p. 86) that 'Development should be sensitive to the historic context and seek to preserve the setting of heritage assets through sensitive design and scale' but this is not carried through. For example, Figure 4.9 is stated to be illustrative, but to 'show the key principles for North Euston Cutting', and shows massive blocks of development showing no sensitivity to their different contexts. The provision of massive blocks of building is followed through at Figure 3.6 and 3.9. It is at best inconsistent: at worst it could be taken as 'what the planners meant'. It is an ambiguity which again fatally flaws the draft plan.

3.2 In interpreting the statement at p. 86 ('sensitive to the historic context') it is critical to set out that there are several historic contexts – and more than one conservation area – each with its own significance. These include the Park Villages, Listed and an integral part of the internationally significant Regent's Park; Mornington Terrace, also Listed, and of major significance in the historical development of Camden Town; Mornington Crescent and Harrington Square, forming a gateway to Camden Town; the major buildings associated with the original canal basin; the Hampstead Road.

3.3 These different contexts each imply differences of scale, of bulk and mass, of open space, its character and planting, of routes through for pedestrians, cyclists, and motor vehicles, of residential scale, of residential service provision whether it is playspace, schooling, or local shops. Each context also requires an understanding of its social and environmental sustainability. Each requires an understanding of its townscape grain and the successful juxtaposition of several distinct areas. This townscape diversity needs to be recognized and identified as setting essential parameters for development.

3.4 In terms of specifics, we object strongly to the mass and bulk set out at Figure 3.9. The predominant height of the Listed houses in Park Village East is 2 stories – this height is of key significance in the historic character of the Park Villages. The juxtaposition of 4, 5, and 6 storey buildings is not consistent with respect for the heritage assets and their setting. This also presupposes that 'ground level' is the same, but this is not yet established (our point 2.1 above).

3.5 Hampstead Road is treated as though it would be predominantly 9-10 stories, but this is to ignore its variety of building heights and types. The scale of the Euston Road should not be used as the model for this entrance to Camden Town.

3.6 While we understand that the blocks shown in Figures 3.9 and others may be illustrative, another graphic device should be used. The blocks shown give an impression of huge monolithic blocks, more prisons than houses, open space entrapped rather than enclosed within. They totally fail to represent the grain of the local townscape which should set the parameters for development. It is disturbing to see blocks 7-8 and 9-10 stories high shown facing each other across a narrow space.

3.7 On uses (p. 88), we welcome the provision of housing, and of affordable housing. But what affordable housing means should be defined in the plan to ensure it is able to meet real

local need, including social housing, and, thus defined, then made a requirement of any planning consent.

3.8 We are concerned about the location of the housing to replace the housing destroyed under the HS2 scheme. It should not be placed on green space within the existing Regent's Park Estate. Where will it be placed? How does the draft Plan address this issue?

3.9 We would also welcome new employment provision (p. 88). This should include a range of provision, affordable workspaces and small workshops and studios, as well as small scale office space. The Plan should use Article 4 type provisions to remove any permitted development rights to convert buildings in employment use to residential.

3.10 There appears to be no adequate consideration of traffic mitigation (p. 88). The acknowledgment of an anticipated major increase in traffic movements in Park Village East (40% in HS2's draft EIA) is not acceptable on either heritage or ecological grounds. There is no adequate provision in the draft Plan for the reduction in car journeys, or use of lorries.

3.11 The approach to green open space is inadequate. Green space is merely shown to fill in the gaps between buildings, yet it could be the starting point for design, a green space with buildings. The existing local areas are characterized by green networks, considerable biodiversity, open spaces in a variety of scales. It is also critical to ensure that deck and associated development are designed to allow for ecologically sustainable planting, and to provide for effective landscape maintenance.

3.12 We are concerned at the delivery strategy. The involvement of the Department of Transport opens the whole plan to the vagaries of national political posturing: this plan should be local.

We look forward to reviewing the further revised Plan due in November 2013.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Richard Simpson', with a long horizontal flourish extending to the right.

Richard Simpson FSA
Chair RPCAAC