

EXAMINATION OF THE EUSTON AREA PLAN (EAP) Additional responses by 9th June 2014
(i.e. additional to responses to the EAP Jan 14 revision, submitted by 5/3/14)

MATTERS, ISSUES AND QUESTIONS FOR THE HEARING SESSIONS

Matters on which we need further information in order to respond, and which would enable recommendations to be made to make the EAP less unsound:

1. Serious evaluation of options for High Speed Two (HS2) that would deliver Euston station on the same footprint. For example, the new double deck down (DDD2), or stopping at Old Oak common, or if HS2 were not to go ahead at all, how then would the EAP look?
2. The case needs to be made for why the Euston area needs regeneration, other than to provide developers with the opportunity for profit. We are not an empty space; we have a community and flourishing businesses. It is the station building that is to be rebuilt; it is unclear who will benefit from shoehorning more residents into this densely populated area.
3. Specific responses are needed to requests for information from individual communities including open space reinstatement for the Regents Park and Amptill Estates, estate security on Amptill, and infrastructure (e.g. schools and health) for all these thousands of proposed additional residents.
4. We would benefit from learning the outcome of the further alterations to the London Plan which goes to public examination in September, in particular the challenge to the proposed intensification of housing and upmarket businesses in Opportunity Areas like Euston.
5. Are there any cases where “Regeneration” has been beneficial to the “host” community with no loss of social housing and negative impact on the current local businesses?
6. The EAP states in the final paragraph of the executive summary that HS2 Option 1 (baseline) “best meets their needs” for homes, jobs, retail space. This needs to be evidenced, and an independent analysis made of what DDD2 can deliver. The public benefit would have to be enormous to justify the level of destruction to be inflicted on the existing communities and businesses.
7. Unless someone defends the people against business interests now, the result will be that the proposed cumulative burden on our communities is otherwise intolerable, the risks to heritage and the environment are considerable, and the constant time-consuming responding to interwoven HS2 and EAP consultations is bewildering and wearing and not conducive to genuine consultation.

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DOCUMENT BUNDLE, shared by

D. Hackman, Netley School GB, St Pancras PCC, Camden Cutting Group, Ampthill Square TRA, HS2 Euston Action Group

Although the petitions and some of the documents relate to High Speed Two (HS2), they are relevant to this EAP examination not only because of the impact HS2 has had on the EAP, but also because the same issues of disregard of the Euston community, being expected to bear the brunt of these developments without benefitting or being compensated are set out with care through voluntary community time.

1. Petitions to HS2 Select Committee delivered to Parliament by 23/5/14 <http://www.publications.parliament.uk/pa/cmhs2/petitions/petcontents.htm>
 - (a) 262 Drummond Street Traders
 - (b) 408 Pan-Camden HS2 Alliance
 - (c) 805 Frank Dobson MP
 - (d) 858 Camden Cutting Group
 - (e) 1057 Netley Primary School Governing Body
 - (f) 1686 HS2 Euston Action Group
 - (g) 1756 Archbishops Council
 - (h) 1837 Camden Civic Society
 - (i) 1842 Dorothea Hackman and Chris Powell
 - (j) 1843 St Pancras Parochial Church Council

2. Other documents will be posted on <http://www.camdencutting.co.uk/>
 - (a) Ampthill Response to Parliamentary HS2 Environment Plan submitted 27 February 2014
 - (b) Ampthill Square Tenants and Residents Maps
 - (c) Bloomsbury Conservation Group Responses the January 2014 Euston Area Plan 5/3/14
 - (d) Regent's Park Conservation Area Advisory Committee
 - (e) St James Gardens Petition
 - (f) Town and Country Planning Act - Inmarsat [*not granted due to detrimental impact on conservation area and that it would radically alter and dominate the local street scene*]
 - (g) United Nations Convention on the Rights of Children
 - (h) Camden Civic Society letter to St Pancras PCC with sound and unsound comments on the EAP
 - (i) Camden Civic Society photos
 - (j) Camden Civic Society maps

3. Responses
 - (a) Compilation: Hackman, Netley, St Pancras PCC, Cutting Group, Ampthill TRA
 - (b) HS2 Euston Action Group and
 - (c) Bloomsbury CAAC comments on EAP Section 6 Heritage

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	Tuesday 1st July 2014					
	organisation	individual	Netley School GB	St Pancras PCC	Camden Cutting	Amphill Square
	representatives	Dorothea Hackman	Dorothea Hackman	Dorothea Hackman	Luisa Auletta	Fran Heron
		Chris Powell	Netley School Pupils	Rev Anne Stevens	Jackson Toms Limb, Steve Martin	Michael Edwards
	documents	1(b)(d)(f)(h)(i) 2(d)(f)	1(a)(c)(e)2(g)	1(g)(j)2(c)(e)	1(b)(d)2(d)	2(a)(b)
	witnesses	Richard Simpson RPCAAC		Hero Granger-Taylor Tony Tugnut BC AAC		
1.	LEGAL COMPLIANCE					
1.1.	Duty to Co-operate Statement cross boundary LA co-operation		Children have rights, set out by the United Nations. See doc 2(g)			
1.2.	Public Consultation How has the Plan reflected the priorities and concerns of local people and stakeholders as expressed at the Stage 1 and Stage 2 consultations, notably on matters concerning Euston Station, the North Euston Cutting, open space strategy and public realm?	Taking away the open space provided by the cutting reduces the amenity and impacts on the area. Into the planning needs to be factored the needs of the local community, not just the commercial needs e.g. to maintain train timetables resulting all night floodlit construction, or to economise on building costs with ugly engineering bridges instead of bridges with architectural merit in keeping with the historic context.	Children have the right to be heard, for governments to protect our rights, and for decisions to be taken in our best interests. Governments have a duty to review their actions for impact on children. However, our responses are not heard. The school governing Body has responded to consultations on matters that affect us. But our views are not taken on board, our play areas will be used as construction compounds 2016-2016 for HS2 then under the EAP there will be a further 8 years of	People who live in the area will have reduced amenity, parks, green lungs. And their right to enjoy family life is denied for years on end.	Second consultation took place during an HS2 ES consultation. Impossible to respond adequately. Do not see major revision taking comments on board, no further improvement to inadequate Heritage Assessment Doc. The proposal to put housing on the Cutting is generally not supported to the North of Granby Terrace. Both during and after construction the Open Space strategy is considered too weak and insufficient. There is concern that "improving" existing open spaces will	Does not reflect adequately need to ensure security on estate. Does not reflect adequately the community support here and across wider area to limit station design to current footprint in order to reduce cumulative significant negative impacts of years of construction-related disruption and trashing of quality of life Does not reflect need to protect all open space. In-fill housing not advised/discussed although residential block incorporating TRA hall was discussed

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			construction.		result in gym equipment and such like being added and the green space being further eroded. The main provision in the North Cutting is too far from most residents and is too dependent on viability tests.	
1.3	Sustainability Appraisal How does the Plan seek to address and mitigate the potential cumulative impacts (c.f. Table X, pp49/50 of the Submission SA) that have been identified outside of the Camden LDF?	It doesn't. The EAP development predates but finds itself in the context of the High Speed Two (HS2) hybrid bill currently before parliament. A significant rewrite of the HS2 hybrid bill will be necessary due to the developments detailed below, so it is important to make the EAP optimal as so that HS2 aligns, rather than allowing HS2 to drive the EAP as it did in 2013 with "option 8" - HS2 tack the extra platforms onto the west side of Euston station. Since the HS2 Higgins report on 17 March, the Secretary of State has directed that the link between HS1 and HS2 be not built	The cumulative effect of all this construction steals our entire childhood and the pollution and dust will impact on the health of we children. And our school is currently being rebuilt. The planners explained that if we withstood 2 years of construction with hardly any playground, we would have a new building for our younger brothers and sisters. Yet the building will continue into the third year putting a lift into the Victorian building, disrupting our right to an education. The Higgins's suggestion is for a development something between Bluewater and Canary Wharf taking 8 further	Further major modifications of HS2 planning are likely, so it is important not to be curtailing the potential of the EAP to fit our current understanding of the HS2 hybrid bill. For instance platform rephasing, in the light of what is actually feasible at Euston, may mean Network rail classic services go to Marylebone or Kings Cross, and HS2 passengers wanting to connect to HS1 could well be directed to change at Old Oak Common.	We cannot find evidence that it is attempting to do this. We are concerned that the Plan has been unduly influenced by HS2's own proposals for station requirements and enlargement.	Have no knowledge of any mitigation suggestions apart from re-providing any homes lost. Does not reflect vital need for public open space to be retained for health, environmental and air quality issues (trees) Routes across estate must not compromise security which is priority of local community. Various other Ampthill matters are described by officers as needing further work - estate security, open space reinstatement and so on. No mention was made of any alteration to commercial area on estate.

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		overground, and that a full redevelopment of Euston station be undertaken, entailing the development of the area from Euston to Parkway.	years of construction after the decade 2016-26 of HS2 construction with an additional 4,000 homes on decking over the track.			
2.	VISION FOR THE EUSTON AREA					
2.1	How does the Plan translate the designation of the Euston Opportunity Area in the London Plan into effective and deliverable proposals for new homes, new business and retail floorspace and public transport improvements?	There are no guarantees that the new housing and business spaces will be available to local people – the developers will be cashing in.	We need the EAP to provide for a coherent and splendid development for the area, not restricted by the present intentions around HS2. In particular we need a plan that presents real benefit to the area in the event of the same footprint option for Euston station. There seems a reluctance by HS2 and the relevant bodies to take onboard the double deck down option for putting the new “high speed” track under the existing classic track, above the underground tunnels. This would mean that no homes on the Regents Park Estate need be demolished.	The authorities will want to cash in from developers investing in the EAP, but luxury homes and upmarket business units will not benefit the people who will suffer another decade of the disruption, pollution and impositions of construction in the area. People will have had a decade of this from HS2, so the EAP needs to build in guarantees of weekly respite days, real mitigations enforced by fines when thresholds are breached, replacement recreation spaces, construction controls, community funds and adequate individual compensation packages.	Concerned that the development will result in another Regents Place – “anywheresville” with too much granite paving and hard geometry, and canyons of streets between over-tall anonymous buildings. Not a good place to live in, unlike almost all of the existing housing where existing communities live. The required additional density will result in places that are not good for families to grow up in.	Vital that needs of current rather than future residents are prioritised in view of the years of hell they will have undergone. Positive discrimination to ensure jobs and homes go to local people. Adequate management of retail rental policy, etc must ensure that small traders are not economically disadvantaged by chain stores able to absorb loss to drive others out of business “Regeneration” is now being increasingly seen as a process which can do more harm than good, especially for the pre-existing residents of regeneration areas, with the schemes becoming increasingly often just big Opportunities for property development. The area around Euston Station is a settled residential and commercial area which does not need “regeneration”.
	2.1 <u>Amphill TRA continues</u> : The station itself does need replacement but that can be done on its own footprint to the benefit of ALL concerned. Attempts to extend the development sideways are entirely unnecessary, highly disruptive to human lives and to flourishing economic activity.. The label Affordable attached to housing hides a multitude of sins and there needs to be absolute clarity what proportion of ‘Affordable housing will be truly social housing not approaching market rents. We would like reliable statistics to demonstrate what can be delivered in terms of					

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				homes, jobs, retail space, etc via a station design within the current footprint such as DDD2. In the last paragraph of the Executive Summary the EAP states that Option 1 (baseline) 'best meets their needs' in these respects. They need to evidence and substantiate this statement and how this has been arrived at. An independent study based on current proposals would provide a reassuring comparison. We need to see a serious evaluation of the "same footprint" option for Euston Station. This work needs resourcing and support from LBC and HS2Ltd. Without it the EAP is not sound. Need more information about proposed social infrastructure in terms of schools, health facilities, etc.
2.2	Local hub and gateway?			<p><u>Camden Cutting Group:</u></p> <p>What does this mean exactly?</p> <p><u>Amphill TRA:</u> Together with KX and St Pancras Euston Road, area along Euston Road is already dedicated to rail with currently 50 platforms in half a mile together with necessary infrastructure. Support the concept of business clusters.</p>
3.	DEVELOPMENT STRATEGY			<p>A new set of revisions to the London Plan (FALP = Further Alterations to the London Plan) get to the Examination in Public stage starting on 1 September and there will be a great debate on the desirability and feasibility of the proposed degree of intensification (housing and jobs) on Opportunity Areas across London. It would be wise to await the outcome and the resulting Plan, expected in 2015.</p>
3.1	Land Use Strategy - new homes, business , research			<p>Acceptable mix but no Student housing, and no large floorplate buildings.</p> <p>Care and positive management policy must ensure small businesses are not crowded out of area</p>
3.2	Social Infrastructure - Health and Education requirements			<p>Little detail provided – not enough requirements for additional facilities</p> <p>Unclear what requirements would be necessary to deliver social infrastructure necessary to support additional homes/ businesses. Where are these facilities going to be delivered</p>
4.	EUSTON STATION			
4.1	world class transport interchange			<p>Very unlikely with Option 8, insufficient detail to know if Higgins plan will be better.</p> <p>Euston Station should reflect its importance. Option 8 is dire example of penny-pinching satisfying no one but causing major negative impacts.</p>
4.2	Bus facilities			<p>TAXI proposals appalling for spreading further pollution.</p>
4.3	pedestrian and cycle routes			<p>inadequate for providing suitable cycling off main roads</p> <p>What are implications for cyclists and those with mobility problems associated with the bridge over tracks from Barnby Street to Hampstead Road. Similarly what are the impacts of the gradient approach to the Hampstead Road Bridge which is an eyesore of gigantic proportions? Seen more attractive bridge design in dock freight areas.</p>
4.4	deliver stated vision			
4.5	Enhancement of area			<p>For whom – unlikely to be an enhancement for local people and existing communities because of the increased density of development proposed.</p> <p>Renewal of Euston Station will enhance area. Eastern and Western boundaries of station must be changed to an attractive and preferably socially useful purpose. What plans are there to clean up sleazy side of Eversholt Street?</p>
4.6	guidance			

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	representatives	Dorothea Hackman	Dorothea Hackman	Dorothea Hackman	Luisa Auletta	Fran Heron
		Chris Powell	Netley School Pupils	Rev Anne Stevens	Jackson Toms Limb Steve Martin	
	documents	1(b)(d)(f)(h)(i) 2(d)(f)	1(a)(c)(e)2(g)	1(g)(j)2(c)(e)	1(b)(d)2(d)	2(a)(b)
	witnesses	Richard Simpson RPCAAC		Tony Tugnutt BCAAC		
5	COMMUNITY REGENERATION					
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?	no	no	no	No it does not.	Sadly, the Plan is predicated on the needs of rail travellers with all other interests subordinated to this priority. Apart from re-provision of lost homes plan does not prioritise the needs of local people. In particular, human scale development. What plans are there for positive community pay-back for endless disruption to lives of thousands of lives ruined and a generation effectively growing up on a gigantic construction site.
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?	Just additional housing crammed into the area.	Not shown – where are the new schools and swimming pools.		Apart from the new Primary School I do not see any further proposals.	No idea. Parks, playgrounds, Sports facilities, Open space, natural habitats and mature flora and fauna destroyed.

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						Re-provision of social infrastructure needs to be sited in close proximity to amenities lost
5.3	North Euston Cutting Do 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?	Too much housing being squeezed over the cutting in architecture unsympathetic to the area, the amenity of the space in the cutting lost.			No. This area does not need or require regeneration. As it sits between the 2 CAs and is currently open, expressing the nature of the railway tracks in an historic cutting, providing a pleasant, open space for the two areas either side. The two communities either side are in fact not disconnected by the Cutting. The scale of buildings proposed is too high for the existing Listed villas and terraced housing to the North. The proposed park removes any sense of the cutting and needs to be located closer to the existing and new housing to the South of Mornington Street Bridge where it will be needed most.	This density spread is unnecessary and due to ridiculous plan for terminus of ECML basically only a canopy rather than substantial platform for development of homes, jobs, retail space, etc. Agree with sentiments expressed in tweet which suggested Option 8 station plan was just a cheapskate lean-to super-glued to existing dingy bit cos HS2 too mean to buy the bolts.
5.4	Drummond Street & Hampstead Road Do Development Principle EAP4 and the accompanying illustrative masterplan at Figure 4.5	Issue of impact of HS2 – shifting ground so EAP proposals must rise above this.		Needs more detail about impact on St James Gardens and reburials		For Drummond Street unique Asian eatery quarter to survive will require positive management. What steps are identified to do this?

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	secure the protection and enhancement of this area as a neighbourhood centre?					Drummond Street Area also has residential sites, blocks and small estates. The proximity of some of this property to negative impacts from construction will not end due to their proximity just a few metres away from proposed south-west entrance to station., e.g. rowdy football crowds
5.5	Regent's Park Estate Do 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 reprovision of social infrastructure?	Needs of construction and running railways are the only consideration in the planning, needs of community disregarded.	No – impact on community of moving hundreds of families out, impact on school of falling rolls, then crowding in 2025...replacement housing built on our playgrounds		The impact of using infill pockets to re-house existing tenants / provide replacement social infrastructure fundamentally undermines the character of the Estate whereby the pockets of mature greenery and open space is necessary for the density of the blocks. The Character Assessment of the Estate is particularly poor (in the Historic Assessment document).	Absolutely not. Only needs of people travelling through Euston area and certainly not those living in it are prioritised.
5.6	Ampt Hill Square and Mornington Crescent Do Development Principle EAP6 and the accompanying illustrative masterplan at Figure 4.7 provide the right framework for					Given the duration and outrageous plans that will disrupt the lives of Ampt Hill residents for at least six years, not only due to their proximity to station, approach and Hampstead Road Bridge but also

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	development in this area particularly in the context of identifying sites for short term development?					outrageous plans by HS2 Ltd within the estate with construction compound 1 hectare in size, HGV transit within estate, loss of amenity, access to play and sports facilities, hall, parking, the idea of quick wins in terms of development is insulting and disingenuous in the extreme. Not sure plans are possible anyway.
5.7	West Somers Town Do 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?	Nothing makes up for decades of relentless construction – noise, fractured sleep, longterm health, life expectancy. Human right to enjoyment of home denied for citizens.				

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	witnesses	Richard Simpson RPCAAC		Hero Granger-Taylor Tony Tugnut BCAAC		
6	HERITAGE					
6.1	How have English Heritage helped shape the Plan's proposals affecting the listed buildings, structures and spaces across the Plan area?	There doesn't seem to be understanding of or respect for the railway and canal heritage in the Camden area, Euston Station, Mornington Street Bridge and Parkway Tunnel and this needs proper expertise.	Concern about safeguarding our heritage. Our grandparents remember the destruction of the Euston Arch and St James church in the sixties. We heard about this from ex-pupils who attended our 130 year celebration and told us about the history of our school and area.	Nothing about protecting or enhancing the Grade 1 listed St Pancras Church during development. Very significant worry about the disregard for the human dignity of the people buried in St James Gardens and their archaeological significance	More importantly why is the EAP Historic Assessment so low on detail? This report is a public realm assessment rather than an unprejudiced historic analysis. CCG is not party to how EH inputted into this document and if they are satisfied with its integrity and accuracy.	
6.2	How realistic is the Plan's approach to the potential reinstatement of the Euston Arch?	We are being fobbed off – however welcome the arch, we'll have the horror of the Hampstead bridge. It won't be the original, and what is important is respecting the architecture and historic context of the whole area.			The Arch is a red herring – the loss of other significant locally listed buildings that contribute to the character of the area is more important, as is the loss of innumerable large trees, as the Plan accepts that the Station can be extended beyond its current footprint.	Euston Arch is a red herring and divisive as support and opposition likely balanced.
6.3	Does the Plan successfully address the issue of building height and tall buildings in the context of	Line of sight maintained to the letter, but character lost		No – no mention of the views of the tower of the Grade 1 listed St Pancras Church.	No - not in relation to the surrounding context – both within the Plan area (such as the small-scale houses	Apart from limiting building height limited over a small section of station area partially limited it appears

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	the London View Management Framework (LVMF), and with particular regard to Figure 3.4 and Appendix 3 of the Background Report?				in and around Drummond Street, nor beyond it (such as allowing 7 to 8 3m height storeys adjacent to the rear of the Listed houses of Mornington Crescent). The scale of indicative development blocks is also not predicated on historic street pattern taking into account solid and void spaces within these.	to Be Open House for speculative development is not discouraged. Euston should be primarily for Camden folk not profit driven because of high cost land values
6.4	How will the Plan secure the enhancement of the following heritage assets:	There will be substantial impact/harm to heritage assets of varying levels of significance. The EAP has not demonstrated that this is necessary to achieve substantial public benefits.				
6.4.1	Church of St Pancras	Streetscape undermined. See doc 2(f)		Heritage setting at risk		Rather than enhancement level of vibrations, congestion and air pollution likely to put building at risk
	St James Gardens	Matthew Flinders and others buried here. See doc 2(e) There needs to be a programme of archaeological works to investigate, analyse, report and archive. This presents a potential significant delay for construction. There was an appalling		Decent reburial – see doc 1 (b) EUS 40 St James Garden burial ground. The archaeological impact of the loss of the eighteenth- and nineteenth-century burial ground at St James's Gardens. There were circa	It absolutely does not secure any enhancement of this space, apparently accepting that it will be swallowed up by a wider station, taxis turning, bike storage and removal of most mature trees.	Gardens of immense historic value and haven of peace in urban environment. CofE Petitioning against removal of laws protecting ancient burial sites and respectful re-interment on consecrated ground. LBC must resist any diminution

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		scenario with HS1 railway construction at Old St Pancras churchyard, there needs to be proper planning and respect; as well as coherent replacement of the amenity, as well as taking account of the long-term research potential.		50,000 burials for whom there will need to be suitable resting places and memorials in consultation with the Vicar of St Pancras New Church, Church of England		of current law on disposal of human remains.
6.4.2	Euston Fire Station					More concerned about the impact on the functionality of emergency services due to the impacts of HS2 over a huge period and potential risk to life and health
6.4.3	Euston Square Gardens	Euston Gardens needs to be maintained as a public amenity, and the neo classical architecture maintained.		The historic setting for the church needs careful planning – especially in the context of earlier changes to the original layout.	The Plan does not secure any enhancement of this space – allowing it to be reduced in area and landscape value.	
6.4.4	Important assets in the North Euston Cutting area	Stephenson retaining wall, Victorian bridges			These are not described adequately in the Historic Assessment and are consequently glossed over in the Plan. In particular the Cutting is mentioned more as a block to movement than as an asset in its own right offering air and a sense of space, and the understanding of the railway coming in to London's first Inter-City	

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						terminal. NB Two opposing sections of Stephenson's wall exist (not one as included in this document).
	<i>Regents Park Conservation Area</i>					The Plan area boundary means that the relationship between the North Euston Cutting and its two adjacent CA's is lost – the cutting appears as a
	<i>Camden Town Conservation Area</i>					blank in most of the Historic Assessment maps – the context and detail just beyond the boundary is missing. Therefore important assets both within and beyond the boundary will not be secured.
7	ENVIRONMENT, OPEN SPACE AND PUBLIC REALM					
7.1	How will the Plan deliver the principles contained in Strategic Principle EAP4 in the context of the overall Development Strategy and the planning regime for the construction of HS2	Hard to see that this could be achieved given the community experience of HS2 thus far!			The Plan objectives are predicated on securing a large new open space in the North of the plan area - but this is identified as only being possible if funding can be secured and is therefore in jeopardy. NB The Historic Assessment notes that the study area is sparsely provided with open space. It also fails to acknowledge the presence of smaller areas of mature greenery.	Impossible to replace open space lost on like for like basis and replacement on quantitative basis in socially beneficial areas is not possible. Therefore vulnerable communities robbed of amenity crucial to well-being.
7.2	How does the Plan address the significant permeability and public realm issues across the Plan area, and should the Plan set out a more	The new highrise will be locked enclaves with no public access to gardens	No replacement of gardens, no additional recreation areas – why not an Olympic		The inclusion of Regents Place in the Plan is not appropriate – it is not a suitable precedent for new public realm, permeability, nor for building height.	In all years of activism in the housing movement have NEVER heard call for prioritising routes across Euston as far more urgent priorities. Routes across areas are a Planners

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	conspicuous and cohesive Public Realm Strategy for the whole Plan area?		swimming pool?			obsession and they look neat and tidy on a bird's eye view of area and do not reflect real life as pedestrians often want to walk diagonally to cut their journey.
7.3	How will the Plan deliver the significant pedestrian, cycle and green link improvements illustrated on Figures 3.5 and 3.6?			Needs more detail about Euston Road pedestrian crossings	The loss of a quiet cycle route into Bloomsbury from Camden Town (currently via Cardington/Melton Street) is not acceptable. Proposing even segregated cycle lanes on main roads does not comply with London Cycling Grid policy where quiet ways are promoted as the best solution.	Until priority of through traffic via Red Routes is stopped plans for pedestrian and cycling improvements will always be limited and safety compromised. Basis crossing points on busy roads are not even provided. Crossing Euston Road is like crossing a crocodile infested Amazon. Note plans to improve crossings on Euston Road. ?elsewhere.
7.4	Is the proposed Euston Station Ultra Low Emission Zone (ULEZ) supported by all key stakeholders				The ULEZ is only a good idea if it does not push more polluting traffic into the surrounding areas which are predominantly residential. There appear to be no proposals to ensure existing communities do not suffer with increased traffic on local roads as a result of the development. An integrated approach to traffic management is required within the Plan.	Probably ELEZ is required and more limits put on non-essential road use within congestion charging zone by enhanced public transport options and restricting HGV/deliveries to early and late in the day, pre and post peak hours. How about provision of self-drive vehicles for hire?