	Wednesday 2 <sup>nd</sup> July 2014	Euston Area Action Group (the Action Group")
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?	The Action Group welcomes the fact that the Revised Draft (January 2014) embraces three options for the new HS2 Station at Euston, namely (i) The sub surface comprehensive station development ("level deck"); (ii) New High Speed terminus along existing station (known locally as "Option 8"); and (iii) Redevelopment on existing station footprint ("existing footprint"). The Original draft (July 2013) was premised only on Option 8, the option which caused greatest damage to the local area whilst offering least in terms of economic regeneration and community benefit. We are comforted that the government has now abandoned this option.
		Local people and businesses see HS2 as a threat, rather than an opportunity. We welcomed Camden's previous plan, "Euston: A Framework for Change - Supplementary Planning Document" (2009). This would have redeveloped the existing station and the surrounding area, whilst offering 1,000 extra homes; 5,000 jobs; public open spaces; and access from west to east. But for HS2, these plans would now be well in hand. Additional council housing would now be available to meet the chronic shortage of affordable homes in the area.
		The Drummond street traders question whether they will be able to survive 10-18 of disruption to their businesses caused by the construction of HS2. There is to be a significant loss of open spaces, partly because of the footprint of the new station, but also because HS2 Ltd seem to think that they have first call on any available open spaces for construction compounds.
		We refer the Inspector to the petitions presented to the House of Commons by (i) the Action Group (cf [18] – [29]); (ii) Mohammed Salique and 13 other Drummond Street Traders (cf [14] – [24]); and (iii) Rt.Hon.Frank Dobson MP (cf [7] – [27]).
		Our preferred option is for a new station within the existing footprint. This will cause least damage to our diverse and vibrant area. It will also offer the community benefits envisaged in 2009.
		We are concerned at the implications of the "HS2 Plus" Proposals for a "level deck" station: The Inspector should seek an undertaking from HS2 Ltd that they accept this Objective of prioritising the needs of local people which underlines the Euston Area Plan. This Objective is

the more important, given the extent of the pain which HS2 Ltd will inflict on our local communities. Reparation is HS2 Ltd's stated approach to mitigating the impact of HS2 (see [9.1.1] of Volume 1 of HS2' Environmental Statement).
We are concerned that HS2 Ltd are rather proposing an overdevelopment of the site to extract unrealistic planning gain to subsidise the cost of this project and inflict yet greater harm on our local communities.
The starting point must be restoration (or reinstatement) for the damage caused by HS2 to our local community. Only then, is it appropriate to consider what further regeneration may be appropriation.
The Action Group seek the following assurances:
(i) that the extra council homes which were promised in 2009 must non-negotiable;
(ii) that these new homes must be in addition to the replacement of any homes which are to be destroyed;
(iii) that all lost open spaces must be secured for the benefit of the existing communities rather than for those who will enjoy the new development;
(iv) that the site must not be over developed; and
(v) that the new development must enhance the existing communities, whether the traders in Drummond Street, residents of social housing who are being required to give up essential open spaces; or those living in conservation areas around the Camden Cutting.
We have been told that "HS2 Plus" will extend the opening date of the new station from 2026 to <b>2034</b> (HS2 Ltd presented to the Euston Station Alternatives Working Group on 24 March 2014). There is likely to be further slippage. This makes a mockery of the Plans Stated Vision for Euston in " <b>2031</b> " (p.ix). There must be a realistic assessment for the timescale for this Plan. There should be an "interim vision" to reflect the reparation that HS2 Ltd must be required to make, by say <b>2020</b> .

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		There must also be clarity about the extent of the land that is to be redeveloped. We have also been told that the gross footprint of the HS2 Ltd's development of the new station has increased from 25,000 m2 (6 acres) to 70,000 ms (17 acres). This seems to be much greater that the redevelopment contemplated from the new station, even under the "level deck" option.
		Again, the Inspector should seek clarification from HS2 Ltd. He will need to satisfy himself that any development gain from the scheme that HS2 Ltd expect to extract from the new station is consistent with the objectives of the Plan. The Action Group is concerned that HS2 Ltd will maximise their land grab, in order to maximise their development gain.
		The Inspector should require HS2 Ltd and Camden to consider the consequences of any further delay to the redevelopment of the Euston area as a result of "HS2 Plus". In particular, a whole generation of children will grow up in the Euston area surrounded by a construction site. Before works commence:
		(i) Any low cost homes which are to be demolished, must be replaced;
		(ii) Alternative open spaces and community facilities must be provided;
		(iii) Maria Fidelis School must be relocated;
		(iv) Proper mitigation measures must be put in place to safeguard local residents and businesses.
		Without these measures, there will be no local community left in <b>2040</b> to enjoy the benefits of the redevelopment at Euston.
5.2	How will the Plan secure the delivery of major new <b>social infrastructure</b> assets that are identified to meet the needs of new and existing communities?	The local community remain extremely sceptical as to whether this plan will prioritise the needs of local people or that HS2 Ltd have any intention to make reparation for the damage that they will cause to the local community.

5.3	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?	Figure 4.4 does not represent the plan that HS2 Ltd presented to the Euston Station Alternatives Working Group on 24 March 2014. This proposed decking over and building on the whole of the Cutting area between Granby Terrace and Parkway. HS2 Ltd should be asked to confirm that they are committed to work within the parameters of the proposed plan. The Plan does not reflect the consequences of HS2 Ltd's current proposal to raise the height of the Hampstead Road Bridge by 6 metres and double its length to 220 metres. This will have a particular impact on the properties in Mornington Crescent. The Action Group oppose the decking over of the cutting as this would conflict with the railway heritage within the cutting and the conservation areas on either side. Mornington Terrace is a Grade 2 Listed Victorian terrace. The cutting includes the George Stephenson retaining wall. Park Village East has a number of important Grade II* Listed Georgian properties designed by John Nash. Our preferred option is for the entire area of the cutting from Granby Terrace to Parkway to be left exposed. If the area over the cutting from Granby Terrace to Mornington Place is to be decked over and developed, any new housing must be sympathetic is size and quality to the other properties in the conservation area. We strongly oppose any development to the north of Mornington Place. Whilst the proposed community space in this area has some attractions, we question whether it is realistic. This would not compensate for the open space which is to be lost south of Granby Terrace on the Regents Park Estate, We note that this decking over was not contemplated in the Draft Plan (July 2013). The Inspector should consider the cost of decking over of this area between Mornington Place and Parkway. We suspect that it is not viable to deck this over for additional green space, however desirable this may be.
5.4	Drummond Street & 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?	 Drummond Street is a unique area in Camden with its strong British Bangladeshi identity and its range of restaurants, shops, and businesses. HS2 Ltd must ensure that these businesses survive the disruption of the HS2 construction works. Thereafter, the existing businesses must be fully integrated into the new station development. Drummond Street must retain its existing character. Local traffic should continue to be able to circulate within the area. We refer to the concerns of the traders which are which are raised in their petition. Whichever option is adopted for the new station, there must be full reparation for the loss of St James's Gardens. This must be for the benefit of those who currently enjoy St James's Gardens, whether those living in the Drummond Street area or on the Regents Park Estate.

		Cobourg Street is currently a quiet residential neighbourhood. This must be preserved. Cobourg Street must not be used as a taxi collection point for the new station. The Plan must recognise the vibrant residential area that currently exists in the Drummond Street area. Any new social housing should not be restricted to the area further to the north of the site.
5.5	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 reprovision of social infrastructure?	The Plan does not reflect the consequences of HS2 Ltd's current proposal to raise the height of and extend Hampstead Road Bridge. This will have a particular impact on the properties adjacent to Hampstead Road. It is unclear how many low cost homes will be lost as a result of HS2, the range being between 158 and 428. These must be replaced before the construction works for HS2 commence. The Plan does not make adequate provision for the replacement of the open spaces which are going to be lost. Upgrading existing open spaces in the south of the estate is not sufficient.
5.6	Ampthill Square and Mornington Crescent 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?	The Plan does not reflect the consequences of HS2 Ltd's current proposal to raise the height of and extend Hampstead Road Bridge. This will have a severe impact on the houses in Mornington Crescent and the Ampthill Square Estate.
5.7	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?	The impact on this area is likely to be greater if HS2 Ltd decide to proceed with their level deck option envisaged in "HS2 Plus". The Charlton Street Market is an important asset in the Somers Town Community. It must be preserved during the construction period for HS2 and enabled to expand.