

## Euston Area Plan

### Proposed Modifications to Submission EAP

#### Statement of Common Ground with High Speed Two Ltd

The following table sets out the proposed modifications to the Proposed Submission version of the EAP which are suggested to be made to address HS2 Ltd's representations with HS2 Ltd's comments/agreement in the final column. This statement of common ground covers all the representations from HS2 Ltd where it considered the plan to be unsound. Each representation has been addressed with proposed modifications to the plan text which both the EAP team and HS2 Ltd have discussed and agreed.

Section	Comment	EAP Position Response/Proposed Change	Agreed
HS2 Planning Process/EAP delivery	<p>[Material Weight of the document and other parts of the plan that refer to works for which planning permission is sought through the High Speed Rail (London – West Midlands) Bill (the HS2 Bill) - Clarity on the planning process for HS2 and its relationship with the delivery mechanisms for the plan]</p> <p>The Plan Context sections needs to state that planning permission for HS2 and associated works is being sought through a hybrid Bill and that the planning authority for the scheme is Parliament. Therefore matters such as the principle for the railway works, their limits, and matters of principle relating to mitigation will be determined through the Parliamentary process rather than the normal Town and Country Planning Act process. Camden Council will be the approving authority for certain conditions attached to the deemed planning permission granted by the HS2 Bill through a special planning regime.</p> <p>If the Plan does not recognise the respective roles of Parliament and Camden Council in the approval of HS2 it is unsound as it will not have a clear and effective delivery process for certain aims in the plan. The Plan will be material to the determination of requests for approval made to Camden Council under the special planning</p>	<p>Insert whole text as requested, with the following additions:</p> <p>"The powers to build and operate High Speed Two are being sought through the High Speed Rail (London – West Midlands) Bill. This Bill seeks deemed planning permission for the railway and associated works and hence the planning authority for HS2 is Parliament. Therefore matters of the principle relating to the railway and the mitigation of the effects of construction and operation will be determined by Parliament. <u>Camden Council, the Mayor and communities can seek to influence the mitigation measures proposed by petitioning the HS2 Bill to ensure appropriate mitigation.</u></p> <p>The HS2 Bill will establish a special planning regime for the approval of certain details including the design and external appearance of stations. Camden Council will be the determining authority for these approvals (subject to appeal) <u>and for any over site development above and around the</u></p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

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	<p>regime insofar as it is relevant to the matter for approval and the grounds for determination.            Permission for any non-railway development over, under or adjoining the HS2 works will not be subject to the deemed planning permission granted by the HS2 Bill and permission for this will be sought through the normal Town and Country Planning Act process.</p> <p><i>Replace "While a Hybrid Bill will grant permission to build a new railway and stations any detailed planning applications will be assessed against the Euston Area Plan" in the third paragraph of section 1.4 with:</i></p> <p><i>"The powers to build and operate High Speed Two are being sought through the High Speed Rail (London – West Midlands) Bill. This Bill seeks deemed planning permission for the railway and associated works and hence the planning authority for HS2 is Parliament. Therefore matters of the principle relating to the railway and the mitigation of the effects of construction and operation will be determined by Parliament.</i></p> <p><i>The HS2 Bill will establish a special planning regime for the approval of certain details including the design and external appearance of stations. Camden Council will be the determining authority for these approvals (subject to appeal) and the Euston Area Plan will be material to their determination insofar as it is material to the matter for approval and the grounds specified in the HS2 Bill for the consideration of that matter.</i></p> <p><i>In a number of instances the Plan indicates requirements in relation to the HS2 works and mitigation. Where these relate to matters that will require approval under the special planning regime the Plan will be material to the consideration (where it is relevant to that approval) but where matters are determined by Parliament through the HS2 Bill this will take precedence over the Plan.</i></p> <p><i>Any non-operational development over, under or adjoining the HS2 works will be approved under the normal planning process."</i></p>	<p><u>station and tracks</u> and the Euston Area Plan will be material to their determination insofar as it is material to the matter for approval and the grounds specified in the HS2 Bill for the consideration of that matter.</p> <p>In a number of instances the Plan indicates requirements in relation to the HS2 works and mitigation. Where these relate to matters that will require approval under the special planning regime the Plan will be material to the consideration (where it is relevant to that approval) but where matters are determined by Parliament through the HS2 Bill this will take precedence over the Plan. <u>The petitioning process for the Bill provides the opportunity for people to try to influence the mitigation measures and works proposed by HS2.</u></p> <p>Any non-operational development over, under or adjoining the HS2 works will be approved under the normal planning process."</p>	

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	<p><i>Elsewhere, where the plan makes reference to the HS2 works this should be made clear.</i></p> <p><i>These changes would make the plan sound by clarifying the role of the Plan and the mechanisms through which the developments in the area would be approved.</i></p>		
<p>3.2 – Silverdale Tenants Hall</p>	<p>[3.2 Social Infrastructure, 1 mitigating the impacts of HS2 (page 44) - Replacement of open space and community facilities affected by HS2]</p> <p>The Plan states: The re-provision of Silverdale tenants’ hall that is currently proposed for demolition is required and should be funded through HS2. Replacement of all open space and any other sports, play or community facilities affected by the construction of HS2, in advance of the commencement works close to their original location. See also Strategic Principle EAP 4: Environment &amp; Open Space for requirements in relation to the mitigation of impacts on open space as a result of HS2 including the reprovision of St James Gardens.</p> <p>This paragraph sets a requirement relating to the mitigation of the effects of HS2 on open space and the tenants hall. HS2’s approach to mitigating these effects is set out in the community assessment section of the Euston CFA report in volume 2 of the HS2 ES.</p> <p>Mitigation measures identified in the ES include the improvement of existing alternative open space and play areas; bringing land into use as open space and play areas; the provision of a replacement tenants’ hall; improving way-finding to Regents Park; and the provision of new public space on the completion of HS2 works (HS2 ES, volume 2, CFA1, chapter 5). In addition to these site specific measures the Hs2 Ltd’s approach to mitigating effects on open space and community facilities is set out in HS2 Information Paper E6: Mitigation of significant community effects on public open space and community facilities (which is available on the HS2 Ltd website).</p>	<p>The Euston Area Plan is being prepared (and funded by HS2 Ltd) to provide a framework for change in the Euston area and to respond to the impact of proposals for HS2. It is therefore considered to be appropriate to set out potential mitigation measures to respond to the impacts of HS2 where appropriate, which will be considered by Parliament as part of the Hybrid Bill process.</p> <p>However given the wide range of mitigation measures that are required to respond to HS2 (some of which may not include direct replacement and many of which are not specifically addressed in the EAP), it is suggested that the relevant bullet point on p44 is amended to read:</p> <p><u>"Mitigating the loss of Silverdale tenants' hall through HS2 Ltd working with Camden Council to re-provide it in an appropriate location. This intention is identified in the HS2 Environmental Statement for the HS2 Hybrid Bill and Camden Council will seek to ensure provision is appropriate. The reprovision of Silverdale Tenants Hall that is currently proposed for demolition is required and should be funded through HS2."</u></p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

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	<p>HS2 Ltd will continue to work with Camden Council to ensure appropriate mitigation is implemented. However, as it is Parliament rather than Camden Council that is the consenting authority for HS2 and approves the approach to mitigation it is not appropriate for this Plan to be so prescriptive.</p> <p><i>Replacement of all open space and any other sports, play or community facilities affected by the construction of HS2 will be provided in accordance with the approach to mitigation established through the provisions of the Bill and the Environmental Minimum Requirements settled through the Bill process. in advance of the commencement works close to their original location. See also Strategic Principle EAP 4: Environment &amp; Open Space for requirements in relation to the mitigation of impacts on open space as a result of HS2 including the reprovision of St James Gardens.</i></p> <p><i>This amendment would make the plan sound by making it consistent with the approval process for HS2. The plan could also usefully make reference to the community mitigation described in the HS2 ES (HS2 ES, volume 2, CFA1, chapter 5) and the mitigation approach set out in HS2 Information Paper E6: Mitigation of significant community effects on public open space and community facilities as these identify the intent of the HS2 project.</i></p>		
3.2 Vacant homes	<p>[3.2 Homes (page 36) section number 1, 2nd paragraph - Statement on potential vacant residential properties]</p> <p>The Plan states that “There is the potential that some residential properties surrounding Euston Station and tracks may become vacant due to the disruption associated with HS2 construction works”. However, there is no technical work to support this statement and hence it cannot be justified and therefore it is unsound.</p> <p>The HS2 ES has assessed the likely significant environmental effects</p>	<p>The EAP does not state that HS2 <i>will</i> result in properties becoming vacant, but acknowledges that this <i>may</i> potentially arise given the scale of anticipated construction activity and change at Euston, and provides planning guidance that can be used should this eventuality arise. This is considered to be entirely appropriate given the potential wider impacts of HS2 (that cannot yet be fully known) and the role of the EAP in managing</p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

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	<p>of HS2. This has not predicted that the construction impacts of HS2 will lead to residential properties becoming vacant. While the HS2 Code of Construction Practice does allow for temporary rehousing, if this were to be required during the construction of HS2, this would be a short term measure and the homes would not be considered vacant.</p> <p><i>As there is no evidence to support the assertion that: "There is the potential that some residential properties surrounding Euston Station and tracks may become vacant due to the disruption associated with HS2 construction works" the statement, and the rest of the paragraph which proposes a policy based on an unjustified assertion should be deleted.</i></p> <p><i>This change would make the Plan sound by removing speculation on residential properties becoming vacant as a result of HS2 which is not supported by evidence prepared for the EAP and is also contradicted by the assessment in the HS2 ES.</i></p>	<p>change in the area. The HS2 Environmental Statement is clear that the project could have impacts on neighbouring properties:</p> <p>"The construction of the project will result in the demolition of 18 dwellings on Cobourg Street, five dwellings on Euston Street and three on Melton Street. The amenity of residents at the remaining properties at the corner of Cobourg Street and Starcross Street is predicted to be affected by nearby construction activity (due to noise and visual effects). The construction traffic and noise on some sections of A400 Hampstead Road, Stanhope Street, Robert Street and Albany Street are predicted to affect the amenity of residents and some community facilities." (HS2 ES Technical summary p57)</p> <p>"Despite the provision of noise mitigation, the amenity of approximately 50 to 60 residential properties at Coniston, Langdale and Augustus House on the Regent's Park Estate will be affected permanently by views of and noise arising from the operation of the project." ((HS2 ES Technical summary p57)</p> <p>"Noise from construction is likely to result in significant adverse effects at residential areas closest to the construction works, including those at St Richards House, Park Village East, Mornington Terrace, Ampthill Estate, Cobourg Street and Regent's Park Estate. A number of non-residential properties, including St Mary's Church, St Aloysius' Roman Catholic Church and the mosque in Starcross Street, are likely to be affected and</p>	

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		<p>construction traffic is likely to affect residential areas and non-residential properties alongside a number of local roads... Operation of the railway has been assessed as likely to result in a significant increase in external noise around residential properties closest to the route within the Regent's Park Estate, including Augustus House, Coniston House and Langdale House." (HS2 ES Technical summary p59)</p> <p>Section 3.2 of the EAP does not require additional mitigation measures from HS2 in this regard, but merely allows flexibility in terms of land uses such this eventuality arise. In order to clarify it is suggested that the meanwhile uses wording is amended as follows:</p> <p><u>"There is the potential that some residential sites and buildings surrounding Euston Station and tracks may be rendered unviable or become vacant due to the disruption caused by HS2 and associated construction works. If this is the case, planning permission will be given to the provision of appropriate alternative temporary 'meanwhile' uses during the construction process. The construction and eventual operation of HS2 from Euston Station will create a different context for the surrounding area which may result in increased pressure for different types of uses in some places. Whilst it will be important to retain the special character of areas such as Drummond Street, there may be circumstances where properties become vacant or the uses are no longer suited to the</u></p>	

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		<p><u>changed context. In these circumstances, where evidenced and justified if this is the case planning permission will be given to appropriate flexibility will be applied where appropriate where considering applications for meanwhile uses particularly during the construction process period of HS2. Consideration will be given to potential need for a permanent change of use - affected sites and buildings once the impacts of the physical environment and operation of the station and tracks are known....."</u></p> <p>It is also suggested that the wording on p45 (Meanwhile uses) is also changed accordingly.</p>	
3.2 Employment training	<p>[3.2 Economy and employment, Economy and Employment 3 Local Business and employment opportunities (page 41) - Employment training in relation to the HS2 works]</p> <p>The Plan states "Development proposals for Euston Station and its environs should therefore include measures to enable local people to access employment opportunities...". The HS2 ES (volume 3, paragraph 11.6.5 makes clear the Secretary of State/HS2 Ltd's intent with regard to training where it states "HS2 Ltd is committed to using the Proposed Scheme to maximise the creation of new apprenticeships, as well as affording existing apprentices employed in the supply chain the unique opportunity to experience working on the Proposed Scheme. Across the supply chain, apprentices will be employed in a wide range of trades and professions from construction to accountancy, quantity surveying to business administration". HS2 Ltd will develop further its policy on training as the scheme approaches construction. HS2 Ltd therefore supports the intent of the policy in promoting training however, as worded this statement in the Plan is unsound in regard to how it relates to</p>	<p>This statement is intended to apply to development projects, across the study area, including development above the station site i.e. development outside the parameters of the Hybrid Bill). The following change is therefore proposed to address this:</p> <p>On the Euston Station site, long lead in times for development provide a particularly strong opportunity to pursue this aim. <u>HS2 Ltd has given a commitment to using the HS2 project to maximise the creation of new apprenticeships, as well as affording opportunities to existing apprentices employed in the supply chain. Camden Council also considers that development proposals for HS2 works at Euston Station and its environs could include measures to enable local people to access employment opportunities and will work with HS2</u></p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

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	<p>the approval process for HS2 as it assumes that through the Plan Camden Council will be able to require the organisation constructing HS2 to provide such training through the planning process. Rather, the policy on training will be developed by HS2 in collaboration with relevant stakeholders.</p> <p>Due to the process through which HS2 will obtain planning permission this is not correct and hence unsound.</p> <p><i>It is suggested that the following amendment is made: "Camden Council believes development proposals for HS2 works at Euston Station and its environs could include measures to enable local people to access employment opportunities and will work with HS2 Ltd on this issue. Best practice from the King's Cross Central development included...". This amendment would make the plan sound by making it consistent with the approval process for HS2.</i></p>	<p>Ltd on this issue. In addition, development proposals for above and around Euston Station and its environs should therefore include measures to enable local people to access employment opportunities, following best practice at the King's Cross Central development, including provision for..."</p>	
<p>3.2 Maria Fidelis school</p>	<p>[3.2 Social Infrastructure, 1 mitigating the impacts of HS2 (page 44) - Reprovision of the Maria Fidelis School at Phoenix Road/Drummond Crescent]</p> <p>The Plan states: The relocation of Maria Fidelis on a consolidated site at Phoenix Road/Drummond Crescent site prior to the beginning of construction for HS2. The North Gower Street site is close to the anticipated expanded Euston Station footprint, and HS2 Ltd are assisting with the relocation of this part of the school to join the existing Phoenix Road school.</p> <p>This section asserts that the Maria Fidelis School should be consolidated at Phoenix Road/ Drummond Crescent prior to the start of HS2 works. While not stated in the Plan it is implicit in this statement that the HS2 works would render the school unviable at its current location on North Gower Street. However, there is no</p>	<p>The HS2 Environmental Statement acknowledges a potential link between the relocation of the Maria Fidelis School and the High Speed Two project. HS2 ES Volume 5 (technical appendices) – draft ES Consultation Summary Report (Section 7.2 Euston – Station and approach) states the following:</p> <p>"7.2.2 Stakeholders expressed concern that the Maria Fidelis Lower Convent School will be located immediately adjacent to a main construction compound for the HS2 works.</p> <p>7.2.3 The school has two campuses located on either side of the current Euston Station. HS2 Ltd remains in discussion with the relevant landowner with a view to acquiring a site on Drummond</p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>



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	<p>technical evidence to support this and hence the statement is not supported by evidence, unjustified and unsound.</p> <p>The HS2 ES undertook an assessment of the likely significant environmental effects of construction work on the school. This assessment concluded that there could be a significant noise effect on the school. However, this does not mean that the school would not continue to operate effectively. It is expected that with mitigation the school could continue to operate in a higher noise environment without detriment to teaching, in the same way that many schools operate in locations where noise levels are higher due to road traffic or construction works. The approach to mitigation will be established through the provisions of the HS2 Bill and the Environmental Minimum Requirements settled through the Bill process.</p> <p>However, while the HS2 works do not necessitate it HS2Ltd is working with Camden Council and the school to explore the options for how it could be consolidated onto the Phoenix Road site.</p> <p><i>The paragraph should be deleted from the section 'Mitigating the impacts of HS2' as the construction effects of HS2 will not necessitate relocation of the school. This deletion would make the section of the Plan sound by removing an unjustified policy aim which is not supported by evidence.</i></p> <p><i>It would be useful for the Plan to support elsewhere the School's aspiration to consolidate its activities on the Phoenix Road site and the assistance HS2 is providing with this.</i></p>	<p>Crescent, adjacent to the Maria Fidelis Senior School on Phoenix Road. If the site is acquired, the Lower School on North Gower Street would move onto this site which is further from the main construction compound."</p> <p>To clarify the context it is suggested replacing the paragraph with the following text, and relocating it to the bottom bullet:</p> <p><u>"In addition there is a long term aspiration to relocate the North Gower Street site of Maria Fidelis school to a consolidated site at Phoenix Road/Drummond Crescent, which HS2 are assisting with as the site is immediately adjacent to the main HS2 construction compound. Its relocation by the appropriate education body prior to the commencement of the construction of HS2 is being sought."</u></p>	
3.2 Replacement homes	<p>[Homes (page 36) section number 1, 1st paragraph - Replacing homes lost as a result of HS2]</p> <p>HS2 Ltd is working with the London Borough of Camden to reprovide the social housing that will be lost as a result of HS2. The position in respect of this housing is set out in section 5.4.48 of CFA1</p>	<p>i) replacement homes for leaseholders. It is agreed that additional information should be provided to clarify how this would be delivered, and a change is therefore proposed below.</p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made</p>

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	<p>in volume 2 of the HS2 Environmental Statement (ES) which states: The Secretary of State for Transport is working in partnership with LBC on the replacement of the social rented housing that will be lost. Where reasonably practicable, this will be in the Euston area and with individual tenants moving only once. Options for the provision of replacement social rented housing continue to be developed with LBC. This could include both the provision of new purpose-built housing and the provision of alternative existing housing, which would be owned and managed by the council. LBC has consulted the local community on potential sites for replacement homes on the Regent's Park Estate. Funding for replacement social rented housing will be made available by the Government. Other homeowners will be compensated for the compulsory acquisition of their property interests in accordance with the National Compensation Code.</p> <p>There are two aspects of the homes section of the 3.2 in the EAP which are unsound:</p> <p>i) It is stated that sites are being identified which could provide intermediate housing for leaseholders whose homes are lost due to HS2. However, as set out in the HS2 ES compensation for the compulsory acquisition of the property interests of leaseholders will be in line with the National Compensation Code. If Camden Council wishes to rehouse the leaseholders from the blocks to be demolished the Plan could be a useful tool to assist with that process. HS2 Ltd cannot, for the reasons set out above, be party to it. Therefore this section of the Plan is unsound as there is no clear delivery mechanism identified and it is inconsistent with the approach publicly set out by HS2 Ltd and the Secretary of State.</p> <p>ii) The Plan states that the replacement homes should be completed before the demolition of the existing houses commences. As stated above the HS2 ES states that it is the Secretary of State/HS2 Ltd's intention that where reasonably practical tenants should only move once and HS2 is working with Camden Council to achieve this.</p>	<p>ii) it is agreed that clarification should be provided to emphasise that the EAP will seek early delivery of replacement homes, but cannot control the timing of demolitions associated with HS2. An alternative change is therefore suggested below.</p> <p>"Camden is working to identify a range of sites that could be used to provide homes, <del>including intermediate housing for leaseholders in the Euston area</del> to replace those lost as a result of HS2, in order to allow people to stay in the area. <u>While the timing of demolitions associated with HS2 is to be established by parliament, Camden Council requires that the delivery of replacement homes is timed so that tenants who will lose their homes only move once. Where reasonably practical, therefore, r</u>Replacement homes should be completed before the demolition of existing homes commences and so priority will be given to reprovision sites. <u>As part of the additional housing provision through infill and renewal sites in existing housing estates (see below), 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".</u></p>	<p>the plan is no longer unsound in this regard.</p>

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	<p>However, it needs to be acknowledged in the Plan that as the consenting authority for HS2 is Parliament rather than Camden Council and as such the Plan cannot be used to control the timing of the demolition of the homes .</p> <p><i>i) Replacement homes for leaseholders</i>  <i>With regard to the statement on intermediate housing for leaseholders in order for the Plan to be sound it should either:</i>  <i>a) be deleted; or</i>  <i>b) a viable delivery mechanism supported by a relevant delivery body be identified in the document.</i></p> <p><i>ii) Timing of replacement homes for tenants</i>  <i>With regard to the statement regarding the relationship between the replacement homes and the demolition this should be made consistent with the public position of the Secretary of State/HS2 Ltd, made in the HS2 ES.</i></p> <p><i>To achieve this the following change is proposed to the relevant sentence:</i>  <i><u>Where reasonably practicable replacement homes <del>should</del> will be completed before the demolition of existing homes commences and so priority will be given to re-provision sites so that individual tenants only move once.</u></i></p> <p><i>These changes would make the Plan consistent with the publically stated intention of the Secretary of State who is responsible for the delivery of HS2.</i></p>		
3.3 Open space provision	<p>[Key Principles (page xi) Drummond Street and Hampstead Road - Re-provision of open space affected by HS2]</p> <p>This paragraph sets a requirement relating to the mitigation of the effects of HS2 on open space and the tenants hall. HS2's approach</p>	This section of the plan refers to general overarching principles for the Drummond Street Character area for its regeneration. It is not considered appropriate to add detailed text around	HS2 Ltd accepts the explanation and considers the plan to be sound

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	<p>to mitigating these effects is set out in the community assessment section of the Euston CFA report in volume 2 of the HS2 ES. Mitigation measures identified in the ES include the improvement of existing alternative open space and play areas; bringing land into use as open space and play areas; the provision of a replacement tenants' hall; improving way-finding to Regents Park; and the provision of new public space on the completion of HS2 works (HS2 ES, volume 2, CFA1, chapter 5). In addition to these site specific measures the Hs2 Ltd's approach to mitigating effects on open space and Community facilities is set out in HS2 Information Paper E6: Mitigation of significant community effects on public open space and community facilities (a copy of which is available on the HS2 Ltd website). HS2 Ltd will continue to work with Camden Council to ensure appropriate mitigation is implemented. However, as it is Parliament rather than Camden Council that is the consenting authority for HS2 and approves the approach to mitigation it is not appropriate for this Plan to be so prescriptive</p> <p><i>Replacement of all open space and any other sports, play or community facilities affected by the construction of HS2 will, like other mitigation, be provided in accordance with the approach to mitigation established through the provisions of the Bill and the Environmental Minimum Requirements settled through the HS2 Bill process. This amendment would make the plan sound by making it consistent with the approval process for HS2. The plan could also usefully make reference to the community mitigation described in the HS2 ES (HS2 ES, volume 2, CFA1, chapter 5) and the mitigation approach set out in HS2 Information Paper E6: Mitigation of significant community effects on public open space and community facilities as these identify the intent of the Secretary of State/HS2 Ltd.</i></p>	<p>HS2's ES and mitigation process at this point in the plan. No change proposed.</p>	<p>in regard to the matter previously raised.</p>

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<p>4.4 Drummond Street (funding proposed works)</p>	<p>[4.4 – Delivery Strategy – Drummond Street Pedestrian Priority (97) - Funding of proposed works to Drummond Street] This section identifies HS2 as jointly funding the works to Drummond Street. However, HS2 Ltd does not intend to fund these works. On this basis this section of the Plan is unsound as it incorrectly identifies a delivery partner. It should be noted that on completion of works any part of Drummond Street which has been occupied for the purpose of constructing HS2 works will be reinstated in accordance with the processes set out in the HS2 Bill.</p> <p><i>Delete the reference to HS2 funding the Drummond Street works. This would make this section of the Plan sound by removing reference to funding from a delivery partner which that delivery partner has not committed to.</i></p>	<p>p97 of the EAP indicates that Camden or HS2 Ltd (or both) could fund these works, and therefore these works may not necessarily be contingent on funding from HS2. However, it may be considered appropriate for funding for post-HS2 reinstatement works to be linked to Drummond Street public realm works, as it would be sensible to link the works together in order to avoid duplication. Moreover, parliament will decide which projects HS2 will help to fund as part of mitigation works, and therefore non-inclusion in the Environmental Statement does not necessarily mean that it will not eventually be included within the mitigation measures for the eventual HS2 project. It is therefore suggested that additional wording is added as follows :</p> <p>" Drummond Street pedestrian priority: Pedestrian priority and through traffic restrictions in the Drummond Street/Euston Street area could be implemented by LB Camden and funded by HS2 <u>so far as required as a result of the works to the railway scheme, topped up by Camden where appropriate /HS2. The area of Drummond Street occupied by HS2 for railway construction will need to be restored to a scheme agreed with the Council. Camden Council will work with HS2 to improve the quality of the public realm here in line with the aspirations of this plan. Delivery would be towards the end of the plan period following HS2 construction.</u>"</p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

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4.5 Regent's Park Estate	<p>[4.5 – Priority for Replacement Homes - Effects on Regents Park Estate residential blocks adjoining HS2 Works]</p> <p>The Plan states "Potentially 191 homes would be demolished on Regent's Park Estate (required to widen the railway cutting) and a further 153 are immediately adjacent to the construction zone. Further work is needed by HS2 and Camden to consider the implications of construction on these blocks." HS2 Ltd undertook appropriate assessment work on the potential effects on the 153 adjacent homes which was reported in the HS2 ES with regard to any significant environmental effects. The statement regarding further work to consider the implications of construction on the 153 homes in the Plan is hence considered unnecessary as the appropriate assessment has been undertaken and reported in the HS2 ES. However, HS2 Ltd is continuing to work with Camden Council to understand how the mitigation measures proposed will be implemented.</p> <p><i>The reference to the adjacent 153 homes should either be deleted or made consistent with the assessment in the HS2 ES as this is the assessment of effects which accompanied the HS2 Bill, ie the application for consent for the HS2 works. This change would make the Plan sound by making it consistent with the ES which is the publically available assessment of the effects of HS2.</i></p>	<p>HS2 Environmental Statement Non Technical Summary states:</p> <p>"Noise from construction is likely to result in significant adverse effects at residential areas closest to the construction works, including those at St Richards House, Park Village East, Mornington Terrace, Amptill Estate, Cobourg Street and Regent's Park Estate" (p57)</p> <p>Given the disturbance that is likely to be caused by the construction of HS2 and the significant changes to the immediate context of these blocks, these blocks may be considered appropriate for redevelopment, although this is yet to be determined by LB Camden and they are requesting further work from HS2 to confirm the impacts on these blocks. The EAP sets out high level indicative masterplanning options should it be decided to redevelop these blocks, but does not indicate that this would necessarily be required.</p> <p>Taking into account this comment from HS2 Ltd, the following changes proposed to the relevant text on pg8:</p> <p>"Potentially 191 homes would be demolished on Regent's Park Estate (required to widen the railway cutting) and a further 153 are immediately adjacent to the construction zone. <del>Further work is needed by HS2 and Camden to consider the implications of construction on these blocks. The HS2 Hybrid Bill process will determine the impact and appropriate mitigation for these adjacent blocks if it is</del></p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

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		demonstrated that they are affected. If these blocks are redeveloped..."	
4.7 Churchway (open space)	<p>[4.7: Environment, Open Space (page 111) - Replacement public open space on the Churchway Estate]</p> <p>This paragraph sets a requirement relating to the mitigation of the effects of HS2 on open space and the tenants hall. HS2's approach to mitigating these effects is set out in the community assessment section of the Euston CFA report in volume 2 of the HS2 ES. Mitigation measures identified in the ES include the improvement of existing alternative open space and play areas; bringing land into use as open space and play areas; the provision of a replacement tenants' hall; improving way-finding to Regents Park; and the provision of new public space on the completion of HS2 works (HS2 ES, volume 2, CFA1, chapter 5). In addition to these site specific measures the Hs2 Ltd's approach to mitigating effects on open space and community facilities is set out in HS2 Information Paper E6: Mitigation of significant community effects on public open space and community facilities (which is available on the HS2 Ltd website). HS2 Ltd will continue to work with Camden Council to ensure appropriate mitigation is implemented. However, as it is Parliament rather than Camden Council that is the consenting authority for HS2 and approves the approach to mitigation it is not appropriate for this Plan to be so prescriptive.</p> <p><i>Delete 1st paragraph and replace with: Replacement of all open space and any other sports, play or community facilities affected by the construction of HS2 will be provided in accordance with the approach to mitigation established through the provisions of the Bill and the Environmental Minimum Requirements settled through the Bill process.</i></p>	<p>As indicated in relation to HS2 Ltd comment 7, it is considered appropriate to set out mitigation measures which Camden Council will continue to seek through the HS2 Bill process where appropriate. It is suggested that the relevant text on p111 is replaced with:</p> <p><u>The playground at Churchway Estate is required by HS2 for construction. The HS2 Environmental Statement identifies the intention to reprovide this and Camden Council will work with HS2 to seek to ensure appropriate provision is made.</u></p>	<p>HS2 Ltd agrees the proposed changes and considers that if these are made the plan is no longer unsound in this regard.</p>

Section	Comment	EAP Position Response/Proposed Change	Agreed
	<p><i>This amendment would make the plan sound by making it consistent with the approval process for HS2. The plan could also usefully make reference to the community mitigation described in the HS2 ES (HS2 ES, volume 2, CFA1, chapter 5) and the mitigation approach set out in HS2 Information Paper E6: Mitigation of significant community effects on public open space and community facilities as these identify the intent of the Secretary of State/HS2 Ltd.</i></p>		