

## Euston Area Plan Examination

### Matters, issues and questions for the Hearing sessions

### Matter 1 Legal Compliance – EAP Team Responses

*Question 1.1: Does the EAP effectively address the issues which have cross boundary impacts, notably on matters concerning The London Plan 2011 (GLA), the Proposed Further Alterations to The London Plan (GLA) and Westminster City Council?*

- 1.1.1 The EAP Statement on the Duty to Cooperate provides a detailed account of how the EAP team has sought to address cross boundary issues through cooperation with a range of stakeholders.
- 1.1.2 The Euston Area Plan has been produced jointly by Camden Council, the Greater London Authority and Transport for London as an Opportunity Area Planning Framework (OAPF) and local plan. The strategic, London-wide overview provided by the GLA and TfL has enabled cross boundary issues to be integrated into the production of the EAP. The EAP team have also carried out ongoing engagement with Network Rail and HS2 Ltd, who attended EAP management and strategic boards, and with Westminster City Council (“Westminster”), which has a boundary close to the west of the EAP area.

#### **The London Plan and further alterations**

- 1.1.3 Euston is identified as an Opportunity Area in the adopted London Plan (2011) and draft Further Alterations (2014), which include London-wide targets for housing and jobs growth for Euston as part of its strategic London-wide approach to delivering and managing growth. The Further Alterations increases minimum capacities at Euston to 7,700 jobs and 2,800 homes, reflecting the figures set out in the draft EAP. Camden Council has requested that the final version of the Further Alterations reflects the latest capacities identified in the Proposed Submission EAP.
- 1.1.4 The overall approach to delivering and managing growth at Euston is therefore considered to reflect and form part of the strategic London-wide approach to development as set out in the adopted and draft alterations to the London Plan.
- 1.1.5 The London Plan also sets out a range of policies regarding managing cross-boundary impacts of development at a strategic level. The GLA, alongside Camden and TfL has sought to ensure that London-wide policies regarding growth and cross boundary impacts are addressed as part of the strategy in the EAP.
- 1.1.6 The key cross boundary impact arising from the EAP is the impact of tall buildings on views from outside the borough, and transport:
- **Tall buildings:** The London Plan and supporting guidance on strategic views sets out the Mayor’s approach to ensuring that new tall buildings do not have unacceptable impacts on designated viewing corridors and panoramas. Reflecting this policy and guidance, the project team, led by the GLA, has

carried out an initial assessment of potential locations for taller buildings taking into account the limits imposed by the strategic viewing corridors, and assessed potential impacts of these locations on local views. Please also see comments provided under Matter 6.

- **Transport:** TfL has formed part of the project team and management structure for the preparation of the EAP, and alongside Camden and the GLA has sought to ensure that cross-boundary transport issues are addressed in the EAP. The London Plan and Mayor’s Transport Strategy propose cross-boundary transport schemes and measures that are reflected in the EAP, including Crossrail 2, station refurbishment and modernisation, enhancements to bus services and infrastructure, cycling projects and highway enhancements.

**Cross borough impacts: Westminster**

- 1.1.7 Camden Council has liaised with Westminster on an ongoing basis regarding planning policy issues in the production of the Camden local development framework, including the recent production of the Fitzrovia Area Action Plan. The Euston Area Plan team have continued this cooperation during the production of the Euston Area Plan.
- 1.1.8 Westminster has expressed general support for the approach taken in the EAP, whilst transport and tall buildings were highlighted as areas of interest for Westminster.
- 1.1.9 Westminster highlighted a wish to ensure that the impacts of any taller buildings proposed are adequately considered, suggesting that a 3D modelling exercise should consider any impact on views from Regent’s Park and other adjoining conservation areas. A subsequent high level 3D modelling exercise was carried out in November/December 2013, with suggested viewpoints requested from Westminster, although no response was received. A number of views were tested from Regent’s Park and adjoining conservation areas, and these are provided in Part B of Appendix 3 to the EAP Background Report. The appendix was sent to Westminster City Council for comment in December 2013, although no response was received. Please also see comments provided on Matter 6.
- 1.1.10 Westminster provided written representations on the proposed submission EAP on 5th March 2014. These representations expressed support for the approach taken in the EAP, in particular in relation to the Transport Strategy (Section 3.5) and Design Strategy (Section 3.4).

*Question 1.2: What mechanisms will be put in place to ensure that effective ongoing consultation and co-operation takes place between all the parties with responsibility for delivering the Plan’s proposals?*

- 1.2.1 The key parties that would be responsible for delivering the proposals of the Plan are included within the Euston Area Plan Management Board and Strategic Board. Both Boards currently comprise Camden, the GLA and TfL with representatives from Network Rail and HS2 Ltd attending and providing technical input, with DfT attending the Strategic Board only.
- 1.2.2 It is anticipated that the Euston Area Plan Management Board and Strategic Board will be retained as a management structure to oversee the implementation of the

Euston Area Plan. The boards will therefore continue to provide a mechanism for consultation and cooperation between the key agencies, allowing ongoing integration and management of key delivery areas such as station redevelopment (HS2 Ltd and Network Rail), planning (Camden and the GLA), onward transport provision (LB Camden and TfL), and a number of key local services provided by LB Camden.

- 1.2.3 Where appropriate, any additional development partner(s) relating to the Euston Station site will be added as attendees at Euston Area Plan Management and Strategic Boards, and formal membership is likely to be varied to include HS2 Ltd and Network Rail (who are currently only attendees) at the delivery stage of the project.
- 1.2.4 Regular liaison and engagement with the City of Westminster and neighbouring boroughs will be carried out as part of ongoing engagement in relation to the production of the boroughs' respective local plans.

*Question 1.3: 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?*

- 1.3.1 The EAP Consultation Statement sets out in detail how the views of local people and stakeholders were sought at the Stage 1 and Stage 2 consultations, and provides details regarding the comments received and how those comments helped to shape the production of the EAP.

**Stage 1 consultation**

- 1.3.2 During the Stage 1 consultation (November/ December 2012), general support was expressed for the proposed EAP objectives. Some key issues highlighted are set out below (more detail is provided in the Consultation Statement).
- 1.3.3 **Euston Station- Land use and connections:** Comments highlighted the importance of east-west links across the station site and the priority for a focus for commercial development on the southern end of the station site, and residential, open space and community uses further north and on the cutting. This was reflected in the draft EAP (July 2013), which sought to enhance east-west connectivity and broadly focused commercial-led mixed use development towards the south of the Euston station area with residential-led development, community uses and open space further north.
- 1.3.4 **North Euston Cutting:** There was a mixed view on whether the area to the north of Granby Terrace should be decked over: several respondents believed that the cutting should be kept open, whilst a number of respondents also felt that it could be turned into a park or partly used for building replacement homes. There was also consistent reference to the need to respect the historic character of the area and potential support for some additional open space. Decking over was therefore included in the draft EAP with an emphasis on new homes and associated external amenity space and replacement public open space. The indicative building heights on the North

Euston Cutting in the draft EAP were informed by careful consideration of historic context.

- 1.3.5 **Housing and open space:** Respondents highlighted an urgent need for more housing, in particular affordable housing, and were keen to ensure that homes and open spaces lost as a result of HS2 would be re-provided in the area. The EAP makes provision for replacement housing and open space, and seeks the delivery of significant additional housing in the area, balanced with potential economic growth.
- 1.3.6 **Local shops and businesses:** There was an emphasis on preserving the character and identity of the area, for example around Drummond Street, and the need to support and maintain local businesses. This was reflected in the draft EAP, which seeks to protect the character and viability Drummond Street; prioritises provision of small business spaces to replace those lost as a result of HS2; and supports local employment by seeking training for local people as part of major development and HS2 construction.
- 1.3.7 **Heritage and local character:** Heritage and the importance of design quality were consistently raised as important considerations. Explicit reference to the importance of reflecting the historic character was therefore added to the EAP Objectives. The importance of design quality and historic character is also highlighted in EAP Section 3.3 (Design Strategy) and in the area based principles in Section 4.
- 1.3.8 **Air pollution:** This was found to be an important concern for local people, particularly in relation to Euston Road, buses and taxis. The draft EAP therefore included text seeking to enhance the environment along Euston Road, proposing the introduction of an Ultra Low Emissions Zone, supporting less polluting forms of transport, and promoting urban greening.

### **Stage 2 consultation**

- 1.3.9 Whilst there was general support for the approach taken to the area around Euston in the draft EAP (e.g. support for improvements to Euston Station) a range of comments were made which informed further amendments which were integrated in the proposed submission version of the EAP:
- 1.3.10 **Euston Station design:** a number of individuals and organisations highlighted the need for a comprehensive approach to station development, with a need to reflect alternatives to the proposed HS2 Option 8 scheme (which was the station scheme shown in the draft version of the EAP and the scheme included in the HS2 Hybrid Bill submitted to Parliament, although this design is now being reviewed further - see response on Matter 3). Images relating to station design were therefore amended throughout the proposed submission version of the EAP to show how EAP objectives and principles could be achieved under a variety of station design scenarios, including (i) a 'baseline' or 'level deck' option, with lowered platforms and tracks and ground level streets; (ii) the HS2 Option 8 scheme; and (iii) an existing station

footprint scenario, which could apply under a ‘double deck down’ station design, or if HS2 were not to proceed.

- 1.3.11 **North Euston Cutting:** Concerns were expressed regarding the impact of the proposed North Euston Cutting development on the character of heritage assets around Park Village East and Mornington Terrace. However, a number of respondents expressed a desire to maximise the amount of open space and/or housing provided here. Camden Council prioritises the delivery of new homes, and the North Euston Cutting provides the potential to deck to provide new housing over under-utilised space in a highly accessible location. In order to address the concerns expressed regarding density, design and the historic context, additional text has been added to Section 4.3 to further strengthen the requirements in relation to design, landscaping and the relationship with the wider townscape and heritage context. The building heights proposed in the EAP for the North Euston Cutting seek to respond to the existing built context, whilst having regard to development viability issues.
- 1.3.12 **Open space:** Concerns were expressed by local people regarding loss of open space resulting from HS2 and the provision of replacement and additional homes, particularly around Regent’s Park Estate. Whilst the draft EAP placed a strong emphasis on open space provision in recognition of these issues, the subsequent (proposed submission) draft was amended to place additional emphasis on maximising opportunities to provide new open spaces, including through:
- Seeking the provision of an open space strategy to accompany proposals for infill housing on Regent’s Park Estate, taking opportunities to make innovative use of under-used land on the estate where possible.
  - Placing a stronger emphasis on the potential for large new open space on the northern part of the North Euston Cutting, subject to viability.
- 1.3.13 **Housing:** Concerns were expressed by community groups regarding the need for more homes, the affordability of housing and the mix of housing proposed. The EAP seeks to provide for new housing development in order to help meet need and demand for homes, including affordable homes.
- 1.3.14 **Development density:** Concerns were expressed by some local people and organisations regarding the density of development proposed for the area. However, several stakeholders/ landowners promoted greater development capacity at Euston and highlighted concerns regarding the viability of delivering requirements for affordable housing, open space and other planning obligations, and the expense of providing decking above the station. The EAP seeks to balance these concerns by seeking to maximise development in the Euston Station area whilst seeking to provide additional open spaces, maximise affordable housing and respect local context including heritage assets.

*Question 1.4: 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?*

- 1.4.1 Table x (p49) of the EAP Sustainability Appraisal Report identifies some of the key cumulative impacts that could arise from growth above and beyond that envisaged in the Camden LDF, and sets out the measures in the EAP that seek to address and mitigate those impacts. Key issues for mitigation are discussed below.
- 1.4.2 ***Potential for increased demands on services and facilities resulting arising from additional residential development:***
- The EAP seeks to ensure that developments provide or contribute towards social infrastructure and open space, in order to address any additional demands created and thus avoid unacceptable impacts on local services and open spaces (see Strategic Principle EAP1 and supporting text).
  - The EAP (p44) identifies a potential need for 4-5 additional primary school forms of entry, and includes specific provision for a new primary school as part of development on the North Euston Cutting, with further provision provided as part of mixed use development or as part of the expansion of existing schools, depending on the level of development provided and schools capacity when development comes forward.
- 1.4.3 ***Potential increased pressure on open spaces as a result of losses associated with HS2, and additional users arising from residential development above and beyond the growth envisaged in the Camden Core Strategy:***
- The EAP acknowledges these potential impacts and plans for the provision of replacement, new and improved open space as part of growth and change, in order to mitigate this.
  - The first priority is for open spaces lost as a result of HS2 to be fully mitigated, and the EAP indicates a proposed new open space on the current Maria Fidelis Lower School site (see Section 4.4 of the EAP) to help achieve this.
  - The EAP seeks the provision of an estate-wide open space strategy to accompany the provision of replacement homes on the Regent's Park Estate, in order to mitigate the impacts of new infill housing development associated with HS2 mitigation, with a variety of measures proposed to achieve this (see p102 of the proposed submission EAP).
  - The Camden Core Strategy and Development Policies (supported by the Camden Planning guidance SPD) seek to ensure that developments make appropriate contributions towards open space provision. Strategic Principle EAP4,C, and supporting text seeks the provision of an enhanced green infrastructure network to respond to demands created by growth comprising on-site provision (see p64); and contributions towards enhancements to the network of open spaces across the EAP area. Relevant schemes and priorities are identified for each sub area in Section 4 of the EAP.

- To help address additional pressures placed on open space, the EAP also places a strong emphasis on the potential provision of a large new open space on the North Euston Cutting, subject to funding.

1.4.4 ***Disruption and disturbance associated with construction, including HS2 and Crossrail 2 as well as additional growth in the area:***

- The EAP seeks to balance growth and the identification of Euston as a major transport interchange and opportunity area with protecting the amenity of local residents and businesses.
- The EAP seeks to minimise the impacts of development on local people ensuring that new development is sensitive to context and the amenity of neighbouring properties, protecting and promoting Drummond Street, and maximising opportunities for local people from growth through the provision of affordable housing along with training and employment opportunities.
- Section 4.7 of the EAP makes specific reference to the need to minimise the impacts of the construction of Crossrail 2, given its proximity to the communities of Somers Town. Reflecting this, Camden Council will seek to work with the Crossrail 2 team to ensure that the delivery of HS2 and Crossrail 2 are integrated in order to minimise impacts and land take requirements.
- Separately to the EAP, Camden Council is both seeking to work with HS2 Ltd to identify measures to minimise the short term construction impacts of HS2, and petitioning the HS2 Bill due to perceived inadequacies in this regard.

1.4.5 The EAP seeks to achieve positive cumulative impacts from development and change in relation to a number of other areas, such as:

- **Housing and affordable housing:** provision of significant additional housing and affordable housing, in order to meet pressing need in Camden and London;;
- **Employment:** provision of significant employment and provides a strong focus on providing training and employment opportunities to local people;
- **Air quality:** the EAP seeks to enhance air quality overall through the provision of an enhanced green infrastructure network, and proposed introduction of an Ultra Low Emissions Zone;
- **Heritage and urban design:** the enhancement of the setting of heritage assets through improvements to the public realm, replacement of buildings that detract from historic areas and buildings (such as Euston Station), and enhancements to undesignated heritage assets (such as buildings around Drummond Street);
- **Sustainable transport and accessibility:** the delivery of enhanced transport infrastructure, such as Crossrail 2 and public realm enhancements would enhance overall accessibility in the Euston area; and
- **Community safety:** The EAP seeks to enhance the safety of streets and public spaces across the Euston area through the provision of active frontages.