

Euston Area Plan Examination

Matters, issues and questions for the Hearing sessions

Matter 3 Development Strategy – EAP Team Responses

Question 3.1: Does Strategic Principle EAP1 (Land Use Strategy) appropriately embody the aspirations of all key stakeholders for the Plan area, with particular regard to the delivery of new homes, new business floorspace and the enhancement of Euston's role in the medical research, knowledge, innovation and creative industry sectors?

- 3.1.1 Strategic Principle EAP1 (Land Use Strategy) has been drafted to reflect and embody the aspirations of key stakeholders in the Plan area, having been developed jointly between Camden Council, the GLA and TfL and also informed by technical information from HS2 Ltd and Network Rail. The plan contains ranges for the number of new homes and jobs that could be delivered in the plan area, reflecting the uncertainty around the final design of the station which significantly impacts on the amount of development which is capable of delivery.
- 3.1.2 This approach has been vindicated through the recent report, published on 17 March 2014, HS2 Plus, by David Higgins, which notes the potential of Euston Station to be a catalyst for regeneration and recommends that a level deck scheme should be investigated which could more readily allow for over site development and stand the test of time. The Secretary of State for Transport and subsequently the Department for Transport have instructed HS2 Ltd to work with Network Rail to develop plans for this alternative comprehensive station design which could be introduced to the HS2 Hybrid Bill as an Additional Provision in December 2014 if recommended.
- 3.1.3 The amount of development, in terms of the number of jobs and amount of commercial floorspace estimated capable of delivery in the plan area is not supported by some local community groups (representors 16 to 20) nor Euston Estates, but for different and opposing reasons.
- 3.1.4 Representors 16 to 20 have commented that the amount of development proposed in the EAP is too great and will result in overcrowding, contravening the European Directive on human rights and preventing the quiet enjoyment of home and family life and livelihoods for people here.
- 3.1.5 Conversely, Euston Estates feel that the EAP is not ambitious enough and underestimates the amount of development capable of delivery above the station. Euston Estates contend that there is capacity for approximately 3,900 homes, 285,000sqm of employment floorspace and 58,000sqm of retail floorspace above a redeveloped and expanded Euston Station. This significantly exceeds the EAP upper development range estimates of 1,900 homes and 270,000sqm of employment floorspace along with in the region of 20,000sqm of retail floorspace associated with station redevelopment.

- 3.1.6 The EAP team have tested capacities for development in the plan area, including that above an expanded station, and consider that the range of homes and jobs set out in the plan is appropriate. Section 8.7 of the EAP Background Report (document EAP7) sets out the methodology used to determine an appropriate range of development in the plan area taking into account requirements for open space and height constraints across the site (see paragraph 3.1.6 below).
- 3.1.7 The Mayor's protected viewing corridors of St Pauls from Primrose Hill and Parliament Hill and the Background Assessment area for views of St Pauls from Greenwich and Blackheath limit the height of potential development across the station site to around 10 storeys, and this height limit is reflected in the capacity testing work. There are two locations identified where taller buildings (up to 60 metres) may be capable of being accommodated as they would appear hidden behind St Pauls, however a detailed assessment of potential impacts on local views and detailed testing using the methodology set out in the Mayor's Local View Management Framework (LVMF) would be required to demonstrate that the impact of taller buildings is acceptable on the strategic and local views. Therefore while their impact is not fully tested, the capacity associated with these buildings has not been included.
- 3.1.8 High level viability testing of the development capacities set out in the EAP has been carried out as part of the Economic Vision work (see document EED3, sections 9 and 10). This work indicates that the range of development shown in the EAP is sufficiently close to viability to progress (para 9.28), based on a high level viability testing process. Viability testing included the estimated cost (provided by HS2 Ltd.) of providing a deck to support development above the station, which is considered to be the most significant individual cost. The report notes that the densities tested are of levels similar to those associated with over-site development at other locations in central London, such as Liverpool Street.
- 3.1.9 Bearing this in mind, and other policy requirements as mentioned above, it is considered that the amount of development proposed in Strategic Principle EAP1 is appropriate. The range of development identified is capable of delivering the appropriate amount of open space and social facilities to support it and is able to meet the wider constraints and policy objectives of the EAP.
- 3.1.10 The Economic Vision work also confirmed that the proportion of knowledge/scientific research/creative uses mentioned in the supporting text to Strategic Principle EAP1 is appropriate. The Executive Summary of the Economic report (page 4) recommends that opportunities for 50-70,000sqm of knowledge sector space incorporating both private sector and institutional developments is provided which is the quantum identified in the EAP. The report recommends 60% of the total commercial development capacity should be for office uses, a further 30% for research and development and 10% retail. It is considered this would also allow for the creation of a larger innovation hub, with the ability of digital creative businesses and some academic research functions to occupy the office floorspace.

- 3.1.11 The report notes (paragraph 10.9) that for the higher education and health sector in particular, where proximity is a premium factor, Euston provides an opportunity for expansion close to anchor facilities – the Wellcome Trust, UCL, UCLH and the Francis Crick Institute in particular. As mentioned in the EAP team’s response to Matter 2, the provision of knowledge/science/research/creative floorspace in the EAP area chimes with the Mayor’s 2020 vision for Euston Road which notes the significant potential to foster the growing cluster of academic health expertise, “Med City” that stretches along Euston Road corridor. University College London (representor 23) noted in their representations to the Proposed Submission version of the plan that they support the revised text for Strategic Principle EAP1 and consider the policy to be aligned with UCL’s vision for the area.
- 3.1.12 The inclusion of a significant number of new homes and seeking to maximise the delivery of affordable homes in the plan area is also a key aspiration of both Camden Council and the GLA. Over 22,000 people are on Camden’s housing waiting list and housing is identified as Camden’s priority land use in the Core Strategy (document CDP1). The London Plan Further Alterations (2014) note that London’s population is set to increase by 2 million in the 25 years to 2036 (paragraph 3.16) and the plan estimates a minimum requirement of 49,000 additional homes a year between 2015 and 2036 to meet the housing demands of this population increase. These figures exceed the estimates set out in the London Plan Revised early Minor Alterations, October 2013 (document GOV 9) (see paragraph 3.16) which informed the production of the proposed submission version of the EAP. The EAP therefore has an important role in assisting in the delivery of new homes in this central location, and as it has been produced collaboratively with the GLA, TfL and Camden Council, it has been demonstrated to meet the organisational and policy objectives for housing provision as far as possible within the site constraints.

Question 3.2: Does Strategic Principle EAP1 adequately address the need for Social Infrastructure in the Plan area, notably in relation to Health and Education requirements?

- 3.2.1 It is considered that Strategic Principle EAP1 and supporting text, together with the wider Plan strategy, adequately addresses the need for infrastructure in the Plan area, whilst allowing sufficient flexibility to allow for changing circumstances. It states that “*Education, health and other community facilities should be provided to support new development and reflect local priorities and needs*”. Development would also be subject to other policies in plan including Strategic Principle EAP1E (social infrastructure) and supporting text, as well as relevant policies in the Camden Core Strategy (see policies CS10 *Supporting community facilities and services* and CS17 *Making Camden a safer place*) and Development Policies (see policy DP15 *Community and leisure uses*).
- 3.2.2 In relation to health provision, whilst the North London NHS have not identified any pressing issues relating to health provision, developments that create additional need

for health services would be required to make appropriate contributions towards new and additional provision as set out under Strategic Principle EAP1.

- 3.2.3 The Euston area is well served by existing health services and infrastructure (see EAP Background Report Section 11). There is a range of smaller scale health facilities in the area that serve the needs of local people, as well as a nationally significant cluster of medical and specialist medical research uses. There are a number of GP surgeries within the Euston area, with a relatively even geographical distribution providing everyday medical care for local people. The new University College Hospital Main Wing (A&E department) on Euston Road offers a range of services including accident & emergency and more specialist services such as a hyper-acute stroke unit, cancer care, critical care, general surgery and general medicine.
- 3.2.4 It is currently difficult to envisage the exact form that any new health provision would take at Euston given the long term nature of the delivery of development and potential changes to the structure and form of health provision that may take place in the intervening years, as well as the range of potential development that is envisaged in the Plan. However, it is anticipated that the provision of new facilities to meet demand for new physical facilities could be provided as part of mixed use development. By way of an example, in the King's Cross Central development, a new health walk-in centre is being provided as part of mixed use development which is to include around 2,000 new homes and 3.4 million sq ft of workspace
- 3.2.5 In relation to education, the supporting text to Strategic Principle EAP1 indicates on p44 the level of education provision that is likely to be required as a result of growth envisaged at Euston, with between 4 and 5 additional forms of entry based on up to 3,800 additional homes being delivered.
- 3.2.6 In terms of existing education provision:
- There are three existing primary schools within or on the EAP boundary, with a number of schools around the study area. A new primary academy school is due to open within King's Cross Central in September 2015 and this is anticipated to meet the anticipated extra demand created by development taking place in the area until 2022/23.
 - In terms of secondary provision, school roll projections indicate that the additional capacity from the introduction of the UCL academy in 2012/13 is likely to be enough to meet need until the end of the reporting period of 2022/23. In addition, Regent High School, which is the closest secondary school to Euston, located just to the north east of the EAP area in the north of Somers Town is being remodelled to create capacity for an additional 2 forms of entry, which would be likely to relieve further pressure until the end of the current school place planning reporting period (2022/23).
- 3.2.7 Whilst the EAP indicates a likely need for up to between 4 and 5 additional forms of entry, the exact level and form of education provision required would be influenced by the amount of growth delivered at Euston, and growth capacity in schools in the

surrounding area at the time any when detailed proposals come forward for development. The EAP identifies land on the North Euston Cutting for the provision of a two form of entry primary school to help meet this need (see Figure 3.2 non p37, as well as Section 4.3 of the EAP). Page 44 of the EAP indicates that additional primary school provision, where needed, could be delivered through the expansion of existing schools, or the delivery of an additional school as part of mixed use development.

- 3.2.8 Secondary school place planning would need to be monitored on an ongoing basis taking into account demographic trends and the capacity available at the schools mentioned in paragraph 3.2.7 above. The EAP states (on page 44) that, where appropriate, financial contributions may be required from developments towards additional secondary school and further education provision.
- 3.2.9 In developing the approach taken towards education provision, the EAP team have liaised on an ongoing basis with officers in LB Camden's Children, Schools and Families (CSF) department, who are responsible for ensuring appropriate education facilities are available in the borough. CSF have confirmed their support for the approach set out in the EAP.
- 3.2.10 In its overall approach, the EAP seeks to provide flexibility in setting out its planning requirements, in particular for the future development of the main development sites at Euston Station and the North Euston Cutting, whilst remaining clear regarding the overarching principles for development. This approach is taken in order to respond to the potential variation in terms of the extent, form and technical issues affecting development on those sites.
- 3.2.11 It is considered that planning the form and extent of social infrastructure provision also requires flexibility given the long lead in times before development is delivered: it is likely that the context in terms of social infrastructure and capacity issues may have evolved by the time detailed proposals come forward, which may influence the amount and form of provision sought.
- 3.2.12 It is considered that the EAP adequately addresses social infrastructure provision, striking an appropriate balance between specifying social infrastructure requirements from developments whilst allowing flexibility in terms of form and extent of delivery.