

SCHEDULE OF REPRESENTATIONS RECEIVED UNDER REGULATON 20 & DRAFT EAP RESPONSES

Submission

Euston Area Plan

April 2014

Schedule of Representations received under Regulation 20 & Draft Euston Area Plan Team Responses

Guide to the schedule content

The following schedule contains copies of all submitted representations (comments) received during the publication period (8th January – 5th March 2014) on the Euston Area Plan Proposed Submission version.

The Euston Area Plan team, which is made up from officers from Camden Council, the Greater London Authority (GLA) and Transport for London (TfL) have reviewed these comments and provided initial responses to the issues raised in them. These are not necessarily the final response to each representation but can act as a basis for discussion with those who have submitted representations (representors) and provide an indication of the team's draft responses and suggested changes to the inspector.

This schedule will be submitted to the Government, in practice to the Planning Inspectorate, who will appoint an independent planning inspector to consider the representations received and note the draft team responses and suggested changes. The team will continue to liaise with representors where appropriate to seek to resolve issues raised prior to examination hearings if possible.

Representor No and Name Section and policy/site/para Representation No	Legally Comp.	Sound/ Why not	Text of representation and any changes required (in italics)	EAP Team Response and suggested changes* *Subject to discussion at the hearings and further consultation
1 - Highways Agency EAP/1			<p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the revised version of the EAP and do not have any comment at this time.</p>	Noted. No change proposed.
11 - Natural England General Support/2			<p>Given the nature of the comments Natural England made to the previous consultation (dated 7th October 2013), where there was broad agreement that the policies contained in the Euston Area Plan were not an issue for us it is clear that this latest version again is agreeable to us. Accordingly no further comments are being made on the latest proposed submission version as these aren't affecting the already positive areas highlighted, such as for instance in the section 3.5 Environment and Open Space Strategy.</p>	Comments noted. No change proposed.
16 / 17 / 18 / 19 / 20 - Individual, Netley Primary School Governing Body, St Pancras Parish Church, Camden Cutting Group, Euston Area Action Group General Support/1	No	No	<p>The groups congratulate officers on their efforts to include issues raised by community groups in responding to the draft plan in October 2013 and to include other station designs and mitigate against negative impact on local communities.</p>	Noted. No changes proposed.
2 - Railway Heritage Trust General Support/2			<p>We have previously discussed the heritage issues of the plan with you, and particularly those items concerned with railway heritage.</p> <p>We have already commented to you in writing about our views on the plan. Apart from the Euston Gardens / Lodges / War memorial area the position is largely as it was previously, and we have no wish to change our comments regarding the Leslie Green station, the cutting walls or the Mornington St Bridge.</p>	Support welcomed. No change proposed.

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			<p>Turning to the Euston Square Gardens and associated buildings, we strongly welcome most of the comments in the revised plan. In particular we are delighted to see the commitment to the retention of the open area, of the original fencing, and of the Lodges and War Memorial in their original positions in all the published schemes.</p> <p>We also note that all your schemes have provision for the creation of a replica of the Euston Arch (portico) in the site that we suggested, on the Euston Grove axis to the north of the War Memorial.</p>	
21 - City of Westminster General Support/4			We welcome the opportunities identified to improve links and connections to the West End from the Euston area and look forward to working with you on the implementation of these proposals.	Noted. Support welcomed. No change proposed.
23 - University College London (UCL) General Support/1			<p>Previous representations and the proposed submission version of the EAP.</p> <p>UCL has a keen interest in the future regeneration and growth of the Euston area and supported the policy direction and vision contained in the draft EAP, which was published for consultation in July 2013. UCL submitted representations in support of the Draft EAP, but requested minor amendments or points of clarification.</p> <p>UCL considers that the proposed submission version of the EAP has responded to the previous comments and now fully supports the EAP. The key issues relevant to UCL are set out below.</p>	Support welcomed. No change proposed.
8 - English Heritage General Support/1			We would like to thank you for the opportunity to comment on the pre-submission draft of the Euston Area Plan. As the Government's adviser on the historic environment English Heritage is keen to ensure that the heritage interest of the Euston area is appropriately conserved, and where possible further enhanced, through the development and implementation of this Plan.	Noted. General support welcomed. No change proposed.

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			<p>English Heritage has worked with the Council throughout the production of the Euston Area Plan to ensure that it promotes conservation and enhancement of heritage assets and the historic environment as required by the NPPF, both in assisting with the preparation of a Historic Area Assessment as part of the Euston Area Plan evidence base, and in providing comments on the previous consultation draft.</p> <p>In general we welcome the production of this plan and we support policies to improve the settings of heritage assets, both nationally and locally designated, and to reinstate lost elements of historic character.</p>	
11 - Natural England General/1			<p>Thank you for your consultation on the above dated 08 January 2014.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	Comments noted. No change proposed.
16 / 17 / 18 / 19 / 20 - Individual, Netley Primary School Governing Body, St Pancras Parish Church, Camden Cutting Group, Euston Area Action Group General/5	No	No	This EAP is therefore not legally compliant, as the state has a duty to safeguard the rights of its citizens. The EAP is unsound as it is neither justified nor positively prepared.	Noted. No changes proposed.
16 / 17 / 18 / 19 / 20 - Individual, Netley Primary School Governing Body, St Pancras Parish Church, Camden Cutting Group, Euston Area Action Group General/4	No	No	The EAP relies on squeezing more high rise high density housing and traffic into the area which will be to the detriment of residents, preventing to an unacceptable degree, the quiet enjoyment of home and family life and livelihood for people around Euston especially in the Drummond/Cobourg street area and on the Regents Park Estate, and also the Camden Cutting, Ampthill Estate and Somers Town.. This is in contravention of the European Directive on Human Rights, and you will be	The EAP seeks to accommodate growth in jobs and homes, to meet Camden's significant housing needs (over 22,000 households are on the housing waiting list) and to replace homes and jobs lost as a result of HS2, and is in line with the Mayor of London's and Camden's aspirations to make sure that new space that could be created above and around the station for development meets community and the local

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			<p>familiar with the advice given in support of this view by QC Kier Starmer (see appendix 1). Having built infill housing to replace homes demolished by HS2 on those Regents Park Estate open spaces not already commandeered by HS2 for construction compounds, the further impact on the lives of children and all vulnerable people on the estate and in the area will be not gaining the recreational areas and parks on the track overdecking as this is sold off to developers to recoup funds.</p>	<p>economy's needs.</p> <p>The EAP has been prepared in accordance with appropriate statutory framework for plan preparation and it is not considered that the EAP is in contravention of the European Convention on Human Rights.</p> <p>A key aim of the proposals for the North Euston Cutting is to provide new streets and spaces above the cutting, which would be publicly accessible and enhance connectivity through the area. The EAP is clear in seeking to create vibrant streets, and avoid the creation of gated enclaves, and the building heights proposed for the North Euston Cutting (see Figure 3.4) seek to make the most of potential development land whilst being sensitive to the surrounding built context. It places a strong emphasis on open space and the provision of green infrastructure (see Section 3.5). The EAP seeks to maximise the provision of open space above the railway cutting and has been amended (since the July 2013 draft EAP) to place a stronger emphasis on providing a larger open space to the northern end of the cutting (see Section 4.3). It also sets out a requirement for an open space strategy to sit alongside new housing infill in the Regent's Park Estate (see Section 4.5). No changes proposed.</p>
<p>16 / 17 / 18 / 19 / 20 - Individual, Netley Primary School Governing Body, St Pancras Parish Church, Camden Cutting Group, Euston Area Action Group</p> <p>General/2</p>	No	No	<p>However, the levels of uncertainty around what the HS2 proposals will permit in terms of the development of Euston station itself, and what damage will be caused to the community around Euston, and the residents in the Cutting Area, mean that the statements in this redraft of the EAP are necessarily so hedged around with phrases like "to the extent possible" and "railway operational requirements permitting" as to offer no reassurance that the outcome of the plan will be beneficial to the community, particularly following on the disruption of HS2.</p>	<p>The EAP seeks as far as possible to provide parameters for the future redevelopment of Euston in order to maximise positive outcomes and mitigate potential negative impacts. However, the contents of the EAP need to be viable and deliverable in order to be found sound, and given the uncertainties regarding the exact nature of any future station design, the guidance is presented as a flexible strategic level guide to development. No changes proposed.</p>

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16 / 17 / 18 / 19 / 20 - Individual, Netley Primary School Governing Body, St Pancras Parish Church, Camden Cutting Group, Euston Area Action Group General/3	No	No	There is also the issue of lost opportunity for community regeneration, which has been estimated at £4billion, and for rebuilding Euston mainline station as a fit for purpose building of which we can all be proud. In addition, we need jobs, businesses and housing, as well as the opportunity to recoup money from developers from the station development.	<p>The EAP seeks to maximise opportunities to deliver a high quality Euston Station that integrates with its surroundings and delivers new homes, jobs and other uses (as well as allowing for the reinstatement of the Euston Arch).</p> <p>The EAP is not able to control the overall budget for the station redevelopment as this is controlled though central government funding and by HS2 Ltd (through the Hybrid Bill process) and Network Rail. However, the EAP seeks to guide the nature of over site development, seeking a comprehensive approach to maximise opportunities and to addresses key issues such as urban design and heritage, transport and connectivity, public realm and integration with the surrounding area.</p> <p>The EAP also seeks to maximise benefits from new development in terms of local job creation, for example through the use of apprenticeships, as well as enhancing the role of a station redevelopment in reconnecting communities that are currently disconnected by the station and tracks.</p> <p>No changes proposed.</p>
19 - Camden Cutting Group General/6			<p>Specific points from Camden Cutting Group:</p> <p>Our neighbourhood is part of Camden and thus will suffer serious decade long disruption due to the construction impacts of HS2, the HS2-HS1 link and works at Euston station. The overall degradation of the quality of Camden plus the impact of specific effects on individual properties is in addition to the human cost of the proposed decking over the tracks, and impact of high density, high rise housing into a quiet residential area of an already crowded part of Camden.</p>	<p>It is proposed to provide housing-led development and significant open space on the North Euston Cutting in order to make better use of currently under-used land, whilst providing for much-needed housing and open space. The Euston area is considered to be an appropriate location for the provision of housing, given its growth area designation, central London location and excellent public transport accessibility. It is essential to ensure that any potential development is planned for now, so</p>

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			<p>The proposals in the EAP impose a further unfair burden on residents in the Camden Cutting area: they, along with other Camden residents, are being asked to suffer severe disruption for ten years for HS2 without effective mitigation or fair compensation. This is then to be followed by a further period of construction by the EAP, decking over the tracks and building housing right up the cutting to Mornington Street, with the further impact on the people of Camden not gaining the recreational areas and parks on the track overdecking as this is sold off to developers to recoup funds.</p>	<p>that engineering works associated with the railway can facilitate development.</p> <p>A key aim of the proposals for the North Euston Cutting is to provide new streets and spaces above the cutting, which would be publicly accessible and enhance connectivity through the area. In response to community concerns made in relation to the draft Euston Area Plan (July 2013), additional text has been added to ensure that full consideration is given to the impact of any development on the surrounding built and heritage context. The EAP seeks to reduce the height of any development towards the north, in order to respond to this context.</p> <p>The EAP seeks to maximise the provision of open space above the railway cutting and has been amended (since the July 2013 draft EAP) to place a stronger emphasis on providing a larger open space to the northern end of the cutting (see Section 4.3), as well as proposing to integrate open space within housing development to the southern end of the cutting. Housing is proposed as far as Mornington Place, beyond which open space is proposed.</p>
<p>2 - Railway Heritage Trust General/1</p>			<p>The Railway Heritage Trust is a company limited by guarantee and owned by its directors. It was formed in 1985, and is sponsored by Network Rail and the Highways Agency (successors to BRB (Residuary) Ltd.), although it is independent of both. It has two objectives, to give grants to:</p> <ol style="list-style-type: none"> 1. improve the heritage features of listed buildings and structures, or such buildings and structures in a conservation area, and 2. to help find new uses for such buildings and structures when they no longer have operational use on the railway. 	<p>Noted. No change proposed.</p>

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			<p>The Trust has awarded over 1,380 grants, to a total value of some £44 million, in its 28 years of existence. It has a current turnover of some £2 million a year, 90% of which is awarded as grants. In addition to awarding grants, it also achieves its objectives by giving advice or comment when required.</p>	
<p>21 - City of Westminster General/1</p>			<p>Thank you for the opportunity to comment on the proposed submission version of the Euston Area Plan (EAP), the accompanying Sustainability Appraisal Report and background documents.</p> <p>As set out in the City Council’s response to the draft Euston Area Action Plan (dated 07 October 2013), Westminster City Council is receptive to Camden’s approach of seeking to influence the High Speed 2 (HS2) design refinement process and shares the borough’s aspirations to secure the best possible outcomes for Euston Station and the surrounding area, especially given Euston’s strategic importance to central London and the West End.</p> <p>Westminster City Council does not have any additional concerns at this stage and our main points are reiterated below.</p>	<p>Noted. No change proposed.</p>
<p>13 - HS2 Ltd 1.2/ overall plan approach - vision and objectives/ overall document/1</p>	<p>Yes</p>	<p>Yes</p>	<p>HS2 Ltd welcomes and supports the positive approach to the future of the Euston area and its environs and the recognition of the regeneration benefits HS2 will bring.</p> <p>HS2 Ltd supports the statement that “The Euston area will be rejuvenated as both a local hub of activity and a gateway to London through new high quality comprehensive and transformational development above and around a world class transport interchange at Euston Station”. This sets suitable goals for the Council, HS2 Ltd and other stakeholders.</p> <p>HS2 Ltd believes that the Plan sets a realistic, yet ambitious, framework for the consideration of planning applications for the commercial and residential development that will result from the HS2 station at</p>	<p>Noted. Support welcomed. No changes proposed.</p>

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			<p>Euston. The level of development envisaged in the plan is, HS2 believes, feasible in the context of the proposed railway. However we welcome the Plan's recognition of difficulties inherent in building over the station and tracks.</p> <p>HS2 Ltd will continue to work with Camden and other stakeholders to achieve the best end result for Euston Station, the local community and London in general that can be achieved within the constraints which HS2 Ltd must operate.</p>	
<p>22 - Ampthill TRA/ Individual 1.2/4</p>			<p>1.2 Vision and objectives (para 2) It is stated that 'Existing businesses, such as those at Drummond Street will flourish.</p> <p>Given their proximity to a decade of demolition and construction within very close proximity to the renowned restaurants in Drummond Street it is difficult to see how this unique and renowned Curry Quarter will survive let alone 'flourish'. The negative impacts faced by these traders is further compromised by the downgrading of a commitment by HS2 Ltd in the ES to provide a safe direct route from Euston from where it is estimated that 80% of patrons emanate as well as their refusal to prevent HGV lorries from using Drummond Street as a designated route.</p> <p>We suggest that in relation to Drummond Street either here or elsewhere in the text it explicitly explains</p> <p>(i) What steps are being taken to support the businesses in Drummond Street through the construction of any new station. This must include the commitment to provide a safe and clear route between the station entrance and Drummond Street which is clearly signposted. This has always been and has remained a demand made at Euston Community Fora</p> <p>(ii) Double Decker Down (DDD2) would provide an opportunity for additional retail outlets to be constructed along Melton Street/Cardington Street while during</p>	<p>Separate work is being carried out to address HS2 construction impacts on Drummond Street and to support businesses in Drummond Street, and the EAP does not seek to repeat this work. Instead, the EAP provides a long term framework to seek to protect and promote Drummond Street as a key local centre. Section 4.4 of the EAP acknowledges potential impacts on the street associated with HS2 construction activity, and sets out a range of measures to protect its role as a centre, including support for meanwhile uses where appropriate during the construction period.</p> <p>The EAP allows for a range of station design scenarios, including an existing station footprint scenario (which could incorporate the community led Double Deck Down (DDD2) proposals), and Figure 4.5 (option 3) shows how such a scenario could relate to the Drummond Street area.</p> <p>The draft EAP was amended in response to previous comments in order to remove reference to pedestrian-only access, with the proposed submission version of the EAP referring instead to pedestrian priority while allowing for appropriate local vehicular access. This change was made in order to address previous concerns expressed regarding the need to allow people to</p>

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			<p>construction of the station and provide an attractive retail frontage attracting custom rather than the planned Berlin-type wall deterring access to traders in Drummond Street</p> <p>(iii) Transport and Public Realm Drummond Street and public realm p96``` Drummond Street/Euston Street will be given pedestrian priority with though traffic restricted and appropriate local access measures in place.’ Throughout the EAP consultations Drummond Street Traders have constantly pointed out that their businesses would be negatively impacted by pedestrianisation of the street. While such a scheme may well have its attractions, traders are extremely worried that preventing vehicular access will impact on deliveries and trade. Unless alternative parking arrangements are put in place for patrons driving into the area and a window for deliveries provided there will be negative impacts on trade.</p> <p><i>We suggest that alternative wording is required to reassure traders to the effect that no actions will be taken that could adversely affect Drummond Street traders without full consultation. While pedestrianisation might be attractive it cannot be achieved without arrangements for deliveries and parking nearby for patrons.</i></p>	<p>access the street by vehicle, while seeking to protect Drummond Street from potentially significant impacts associated with through-traffic from a much larger Euston Station.</p> <p>The following further amendment is suggested: "Public realm improvements will be sought for the area including Drummond Street, Euston Street and Stephenson Way. In association with this, Drummond Street/Euston Street <u>will be designed as a pedestrian and cycle friendly place with a high quality public realm and appropriate traffic management measures to make it a successful and vibrant place.</u> will be given pedestrian priority with through traffic restricted."</p>
<p>13 - HS2 Ltd</p> <p>1.4 - HS2 Plannig process/ EAP delivery/2</p>	<p>Yes</p>	<p>No, Not Effective</p>	<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</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</u></p>

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			<p>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 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: "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. 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. In a number of instances the Plan indicates</i></p>	<p><u>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 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>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><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 - Canal and River Trust (London)</p> <p>2.2/1</p>			<p>We have no particular comments in addition to our previous comments made in August, as below. However, we would point out that the canal should be labelled the Regent's Canal, and not the Grand Union Canal, as shown on Figure 2.2 on page 15.</p>	<p>Amend Figure 2.2 on p15 to read 'Regent's Canal' as requested.</p> <p>The comments made by the Canal and River Trusts on the draft Euston Area Plan (July 2013) are provided below., along with Camden's response to those comments.</p>
<p>12 - Bloomsbury Conservation Area Advisory Committee</p> <p>2.3 - Euston Square Gardens/1</p>			<p>p. 18. Euston Road: it should be stated that this character area and its important historic buildings include the original Euston Square. Euston Square Gardens are described as a historic protected square without acknowledging that they are the remaining part of that square. The historic Euston Square should be stated to be the basic template for any conservation and regeneration opportunities. It comes under the protection of the London Squares Preservation Act of 1931. It now also has a number of dominant buildings in classical and Greek Revival style on and around its boundaries, including the Wellcome Building, 1-9 Melton, Friends' House, and St. Pancras Church, which are now the characteristic feature of the former Euston Square and the Euston Road Character Area.</p>	<p>The EAP (on p18) already notes that "Euston Square Gardens itself is a historic protected London Square that provides the setting for Euston Station". Further context is then provided regarding the Gardens and nearby heritage assets in the EAP Background Report and Historic Area Assessment.</p> <p>Section 4.2 of the EAP seeks to restore the setting of the Gardens and the restoration of elements of their historic design and heritage assets.</p> <p>No change proposed.</p>
<p>6 - Individual (London Forum</p>	<p>Yes</p>	<p>No, Not</p>	<p>The shortage of affordable housing is so acute that all</p>	<p>Support welcomed.</p>

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of Civic & Amenity Societies) Housing and transport/1		Effective	<p>the proposed new housing is needed in addition to existing housing, not instead of it. Only then might the Mayor's target of 42,000 per annum be met. In our view it falls short of the need, which has been estimated to be at least 49,000.</p> <p>There is much to commend in the report: improvements to east-west connectivity, long overdue ped link from Euston LU to Euston Square LU; getting rid of the wind trap that is Euston Square now; decking over the lines for residential accommodation.</p> <p><i>It needs to place HS2 on the same conditional footing as Crossrail2. It needs to stress the imperative of some alternative solution to HS2, which could be built without decimating housing estates in Camden, either by going under Euston (acknowledged) or avoiding it (not acknowledged as a feasible option)</i></p>	<p>The EAP seeks to set out measures to provide a framework for the delivery of replacement housing, along with additional, new housing, and seeks to maximise housing delivery including through development above the Station and tracks, North Euston cutting and Camden's housing estates, where appropriate opportunities emerge.</p> <p>The EAP is flexible to accommodate a range of eventualities in relation to station redevelopment , including an 'existing footprint' option, which could be taken forward if HS2 were not to proceed. No change proposed.</p>
22 - Ampthill TRA/ Individual - /2		No	<ul style="list-style-type: none"> • It fails to adequately represent the views of local communities in the Euston area • It fails to give equal prominence in text and images to the strongly supported and locally generated Double Decker Down (DDD2) alternative station design (as agreed between the representatives of the Euston Area Forum and the EAP Team at a EAP workshop at the H-Pod on Regents Park Estate in October 2013 • HS2 Ltd have consistently refused to contemplate discussion of design alternatives for Euston Station so that community influence is limited to the EAP • While DDD2 is not precluded by the EAP it is not included as a credible alternative nor the pros and cons discussed in the text while the rejected Option 1 is discussed thoroughly. • We consider therefore that it has not been given proper consideration within the EAP which attracts local community support not least because negative adverse 	<p>Following consultation on the draft EAP in summer 2013, the Euston Area Plan was amended to show how its strategic principles and development principles could be applied under different station design scenarios, including a solution on an existing station footprint design, which could include a 'double Deck Down 2' (DDD2) option. Page 31 of the EAP states that the plan seeks to provide a flexible framework to progress three key station design scenarios (sub surface, alongside existing station, and redevelopment on existing station footprint). The existing station footprint scenario could also be applied to a non-HS2 scenario, should the scheme not go ahead, as well as to DDD2.</p> <p>Whilst designs for Double Deck Down 2 (DDD2) are still being developed by the community and analysed by HS2/Network Rail and key stakeholders, the EAP seeks to allow for such a solution, and the high level principles established in the plan could be applied to such</p>

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			<p>impacts flowing from Option 9 or Baseline Option 1 would be very significantly reduced</p> <ul style="list-style-type: none"> • the inclusion of HS2 Ltd exerting influence in a tripartite Strategic EAOPF Board gives undue bias since their remit is simply to deliver High Speed Two and not to consider the needs and aspirations of local communities and impacts upon them • This conflict of interest is amplified since one of the roles of the board (1.1(d)) is 'to lobby and influence the management of external relationships'. • HS2 Ltd have misrepresented and actively obstructed the progress of developing DDD2 design plan. 	<p>a design as equally as they could to an Option 8 or Baseline/level deck option.</p> <p>The EAP is being produced jointly by Camden, the GLA and TfL. Whilst HS2 is funding the project and attends Management Board and Strategic Board, it is not considered to have undue influence and has sought changes to the EAP through the use of representations as have other individuals and organisations. HS2 and Network Rail are key stakeholders as they are currently likely to be the organisations responsible for delivering a new station and will be involved with the resulting development above and around it, therefore their technical support has been crucial in developing the plan. The EAP has to be viable and deliverable in order to be found sound, and therefore regard has to be had to potential realistic scenarios in relation to station delivery, which includes the current Option 8 design proposed by HS2 Ltd, the original baseline or level deck scheme the SoS has recently asked HS2/Network Rail to investigate, as well as other alternatives such as DDD2.</p> <p>The EAP illustrations generally show the maximum land take in general to ensure that if options with wider land take are progressed (which are the two that have been progressed by HS2 to date, and the extent of landtake in the HS2 ES) there is a clear strategy for this scenario. Of course if this wider land take is not required, that wouldn't make a station design based on a smaller footprint incompatible with the EAP and indeed it is specifically allowed. No changes proposed.</p>
22 - Ampthill TRA/ Individual - /1		No, Not Justified	<p>There is much to welcome in the Euston Area Plan and the key criteria that underpin it.</p> <p>Given its intrinsic importance it is vital that the EAP</p>	<p>Following consultation on the draft EAP in summer 2013, the Euston Area Plan was amended to show how its strategic principles and development principles could be applied</p>

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			<p>accurately reflects the views of all stakeholders accurately. Because it fails to adequately represent the views of a significant cohort of the local communities we believe it is unsound.</p> <p>This objection falls within the remit of</p> <p>Being 'justified' and founded on a 'robust and credible evidence base'.</p> <ul style="list-style-type: none"> • There is evidence of local community participation but that this has failed to influence the document despite a commitment by the EAP Team to give equal weight in terms of text and images to the DDD2 emerging design • Choices made in the plan were limited to in-depth consideration only of Option 8 and Baseline Option 1 when an undertaking was given to the representatives at the Euston Community Forum that equal treatment would be given to the developing DDD2 option. <p>Option 1 has already been comprehensively rejected by the Secretary of State for Transport on grounds of cost and that it could not be delivered in the time frame required (said to require an additional 3 years to construct the station after the date planned for the opening of HS2 Phase 1)</p> <ul style="list-style-type: none"> • We do not consider that the DDD2 alternative has had equal treatment in the EAP 	<p>under different station design scenarios, including a solution on an existing station footprint design, which could include a 'double Deck down 2' option. Page 31 of the EAP states that the plan seeks to provide a flexible framework to progress three key station design scenarios (sub surface, alongside existing station, and redevelopment on existing station footprint).</p> <p>Whilst designs for Double Deck Down 2 are still being developed by the community and analysed by HS2, Network Rail and key stakeholders, the EAP seeks to allow for such a solution, and the high level principles established in the plan could be applied to such a design as equally as they could to an Option 8 or Baseline/level deck option.</p> <p>To ensure it is clear that the principles for the station which apply to redevelopment on the "existing footprint", option 3, additional text will be added to clarify that this includes schemes such as the community led Double Deck Down scheme, which would result in less demolition or if HS2 does not go ahead at all. Please see the suggested alterations to the EAP text below (in response to Representor 7 comment 1 and other representors).</p>
<p>7 - Transport and Salaried Staff's Association</p> <p>- /1</p>	<p>Yes</p>	<p>Yes</p>	<p>We are disappointed that the Euston Area Plan does not provide more detail on and a strong preference for alternatives ways to redevelop Euston Station. The current plans for redevelopment envisage significant land take for a surface level HS2 station abutted onto the existing Euston Station, a view that even the Chancellor of the Exchequer now seems to be moving away from.</p> <p><i>Our preference would be for a mainly or wholly sub surface level combined station, possibly as a refinement</i></p>	<p>The proposed submission version of the EAP sets out in detail how the objectives and principles of the EAP could be taken forward through a range of alternative station redevelopment scenarios, including a largely sub surface station design, an approach that used the existing station footprint (which could include the community led Double Deck Down), as well as an Option 8 scheme as currently proposed by HS2 Ltd (see Figures 4.1 and 4.2).</p>

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			<p><i>of a former proposal for a double decked station. This new design would fully integrate the existing Underground station into a new HS2 and conventional rail station, at a new level lower than the existing above surface station hence increasing level access across the station site.</i></p> <p><i>This proposal would significantly reduce the land take requirement and make large reduction in the need for and cost of compensation, and this cost saving would significantly counterbalance the increased cost of building works. In our view this proposal would reduce the time to, and dislocation from, building the new station as much of the redevelopment would take place away from the current station lines and tunnels, permitting more continuous rail services as well as a much greater element of round the clock working.</i></p>	<p>The Development Strategy (Section 3.1, p31) sets out the three main station redevelopment options, and provides a comparison that emphasises the potential benefits of a lowered station design approach, and of a comprehensive approach to station redevelopment.</p> <p>The EAP is flexible to allow for a range of station development scenarios whilst setting out the principles that should be addressed by any station design.</p> <p>It is acknowledged that, whilst raising many of the same issues in terms of an 'Option 8' station design in terms of public realm and connectivity, a 'double deck down' station design would bring benefits in terms of avoiding the demolitions currently associated with HS2 proposals. The following changes are therefore proposed in order to reflect this:</p> <p>Page xi "Euston Station and tracks: A comprehensive station redevelopment to transform Euston's image and potential for between 1,000 and approximately 1,900 new homes and between 7,200 and approximately 13,600 additional jobs depending on station design and footprint, railway constraints and cost of decking. A comprehensive approach to station design based around lowered tracks and platforms is more likely to allow for greater development and a transformational high quality development here. <u>A redevelopment within the existing station footprint would reduce the required demolitions and associated mitigation requirements that would result from proposals on an expanded station footprint</u>"</p> <p>page 31 (Development Strategy), "3: Redevelopment on existing station footprint "The redevelopment of Euston could be</p>

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				<p>progressed within the existing station footprint, in the event that the HS2 project is not progressed, or with alternative design solutions <u>such as the community led Double Deck Down station design, with High Speed Two platforms and tracks at a lower level and Network Rail tracks at ground level. These options would reduce the required demolition of homes, business premises and open spaces and mitigation requirements associated with proposals on an expanded station footprint.</u> Therefore illustrations of how the principles for station design could be applied to the existing station footprint are also provided</p> <p>Comparison The EAP Sustainability Appraisal which has been prepared alongside the EAP highlights the sustainability benefits of lowering the track and platforms and redeveloping the station to allow for the creation of new streets, open space and buildings above. The appraisal also highlights the benefits of a comprehensive approach to redeveloping the station area, even where the existing basic station infrastructure is fundamentally retained, but clearly shows the most benefits for the area can be secured through a scheme similar to the baseline / or any level deck station design which lowers platforms and tracks. <u>It should also be noted that options to redevelop Euston Station on the existing station footprint would bring benefits in terms of avoiding demolitions and associated mitigation requirements, although such approaches would reduce the ability to provide new at-grade streets, open spaces and building entrances"</u></p>
22 - Ampthill TRA/ Individual 3.1 - Station design/5			3 Development strategy p31 1. Sub-surface comprehensive station redevelopment states that 'The baseline or similar design would better meet the objectives of this plan and make the best of	DDD2, is a community led double deck down scheme, and development opportunities have not been fully tested as the station design work is still being developed and therefore their

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			<p>the regeneration opportunities' here'. We absolutely contest this statement since no adequate comparison has been made with the DDD2 scheme Contrary to supposition that a reduced station footprint will reduce regeneration opportunities, while no formal analysis has been undertaken it is fully expected that DDD2 development opportunities will equal if not exceed the target for housing and jobs. Furthermore it is likely to reduce the timescale for construction of the station, requires little demolition and no loss of homes</p>	<p>development capacity is not confirmed. The statement, and the wider EAP would not preclude the delivery of DDD2.</p> <p>It is acknowledged that DDD2, whilst raising many of the same issues in terms of an 'Option 8' station design in terms of public realm and connectivity, it would bring benefits in terms of avoiding the demolitions currently associated with HS2 proposals. The following changes are therefore proposed in order to reflect this:</p> <p>Page xi "Euston Station and tracks: A comprehensive station redevelopment to transform Euston's image and potential for between 1,000 and approximately 1,900 new homes and between 7,200 and approximately 13,600 additional jobs depending on station design and footprint, railway constraints and cost of decking. A comprehensive approach to station design based around lowered tracks and platforms is more likely to allow for greater development and a transformational high quality development here. <u>A redevelopment within the existing station footprint would reduce the required demolitions and associated mitigation requirements that would result from proposals on an expanded station footprint</u>"</p> <p>page 31 (Development Strategy), "3: Redevelopment on existing station footprint "The redevelopment of Euston could be progressed within the existing station footprint, in the event that the HS2 project is not progressed, or with alternate design solutions <u>such as the community led Double Deck Down station design, with High Speed Two platforms and tracks at a lower level and Network Rail tracks at ground level. These options would reduce the required demolition of homes, business premises and open spaces and</u></p>

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				<p><u>mitigation requirements associated with proposals on an expanded station footprint.</u> Therefore illustrations of how the principles for station design could be applied to the existing station footprint are also provided</p> <p>Comparison The EAP Sustainability Appraisal which has been prepared alongside the EAP highlights the sustainability benefits of lowering the track and platforms and redeveloping the station to allow for the creation of new streets, open space and buildings above. The appraisal also highlights the benefits of a comprehensive approach to redeveloping the station area, even where the existing basic station infrastructure is fundamentally retained, but clearly shows the most benefits for the area can be secured through a scheme similar to the baseline or any level deck station design which lowers platforms and tracks. <u>Options to redevelop Euston Station on the existing station footprint would bring benefits in terms of avoiding demolitions and associated mitigation requirements, although such approaches would reduce the ability to provide new at-grade streets, open spaces and building entrances"</u></p>
<p>13 - HS2 Ltd 3.2 - Silverdale tenants hall/7</p>	<p>Yes</p>	<p>No, Not Effective</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 & Open Space for requirements in relation to the mitigation of impacts on open space as a result of HS2 including the re-provision of St James Gardens.</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</p>

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			<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>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 & Open Space for requirements in relation to the mitigation of impacts on open space as a result of HS2 including the re-provision 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</i></p>	<p>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 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 re-provision of Silverdale Tenants Hall that is currently proposed for demolition is required and should be funded through HS2."</u></p>

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			<i>community effects on public open space and community facilities as these identify the intent of the HS2 project.</i>	
13 - HS2 Ltd 3.2 - Vacant homes/4	Yes	No, Not Justified	<p>[3.2 Homes (page 36) section number 1, 2nd paragraph - Statement on potential vacant residential properties] 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. The HS2 ES has assessed the likely significant environmental effects 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. 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>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 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</p>

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				<p>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 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>"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 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</p>

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				<p>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....."</p> <p>It is also suggested that the wording on p45 (Meanwhile uses) is also changed accordingly.</p>
<p>13 - HS2 Ltd</p> <p>3.2 - Employment training/5</p>	<p>Yes</p>	<p>No, Not Effective</p>	<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 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. Due to the process through which HS2 will obtain planning permission this is not correct and hence</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 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...</u>"</p>

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			<p>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>13 - HS2 Ltd</p> <p>3.2 - Maria Fidelis school/6</p>	<p>Yes</p>	<p>No, Not Justified</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 technical evidence to support this and hence the statement is not supported by evidence, unjustified and unsound. 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</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 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</u></p>

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			<p>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><u>Road/Drummond Crescent, which HS2 are assisting with as the site is immediately adjacent to the main HS2 construction compound. Its relocation prior to the commencement of the construction of HS2 is being sought."</u></p>
<p>13 - HS2 Ltd</p> <p>3.2 - Replacement homes/3</p>	<p>Yes</p>	<p>No, Not Effective</p>	<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 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</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>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, including intermediate housing for leaseholders in the Euston area 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</u></p>

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			<p>for the compulsory acquisition of their property interests in accordance with the National Compensation Code. 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. 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 With regard to the statement on intermediate housing for leaseholders in order for the Plan to be sound it should either: a) be deleted; or 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 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><u>their homes only move once. Where reasonably practical, therefore, replacement homes should be completed before the demolition of existing homes commences and so priority will be given to re-provision sites. 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>

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			<p><i>To achieve this the following change is proposed to the relevant sentence: Where reasonably practicable replacement homes should 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.</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>	
<p>22 - Ampthill TRA/ Individual 3.2 - Housing/6</p>			<p>3.2 Land use strategy B: Homes p34 Strategic Principle EAP1 states that</p> <ul style="list-style-type: none"> • 'A proportion of student housing may be appropriate 'as part of this additional housing' – we propose that this should instead reflect the crucial provision of permanent homes so that it should read –'in addition to affordable housing' (rather than as part of). • The provision of social-rented housing should be 'additional to' any social-rented homes that will be demolished and which are to be replaced with social-rented homes. 	<p>The EAP seeks to maximise the provision of housing, which could include an element of student housing. However, Strategic Principle EAP1B seeks to ensure that at least 75% of new housing should be provided as permanent self contained homes (use class C3) and states that the maximum reasonable amount of affordable housing will be sought.</p> <p>The supporting text (p36) clearly differentiates between replacement housing and additional housing, and under '2. Additional housing' states that affordable housing will be sought in line with Camden's existing planning policies, which seek to secure the maximum reasonable level of affordable housing.</p> <p>No change proposed.</p>
<p>23 - University College London (UCL) 3.2 - Education and student housing/2</p>			<p>Land use strategy (Strategic Principle EAP1) UCL's draft representations on the draft EAP outlined the potential for a significant amount of additional academic, research and student accommodation uses to be provided within the EAP and requested that academic, research (Use Class D1) and complimentary student accommodation space (Sui Generis) is identified in the land use strategy.</p> <p>Principle EAP1 has been amended in the proposed submission version of the EAP and now includes specific reference to the provision of D1 use classes and student accommodation. UCL supports the revised text and</p>	<p>Support welcomed. No change proposed.</p>

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			considers that the approach provides sufficient flexibility to ensure that a complimentary mix of uses is achieved. The policy is aligned with UCL's vision for the area and UCL now fully supports Principle EAP1.	
23 - University College London (UCL) Meanwhile uses/3			UCL supports the approach to encourage temporary alternative uses of buildings blighted by HS2. This approach will help to bring buildings back into viable use and consequently enhance the vibrancy and vitality of the area. The policy wording has been retained in the proposed submission of the EAP and is supported by UCL.	Support welcomed. No change proposed.
6 - Individual (London Forum of Civic & Amenity Societies) 3.2 and 3.4 - Transport/3	Yes	No, not Justified, and not Effective	HS2 supporters claim it is needed to boost capacity. The greatest capacity needs are for commuters at peak periods. Diverting commuters away from Euston to accommodate long distance travellers will be deeply unpopular, it will also adversely affect the mix of retail units likely to be successful on the station forecourt. Walking: Ground level pedestrian routes are ESSENTIAL (fig. 3.3), not merely preferable. <i>The plan needs a section on reducing the need to travel (in terms of miles not numbers) and how redeveloping Euston could achieve this.</i>	The EAP seeks to reduce the need to travel through the provision of mixed use development. It promotes walking and cycling as alternatives to motorised and public transport, in order to take pressure off existing transport infrastructure. This includes seeking significant improvements to the public realm as well as substantial cycling infrastructure. No change proposed.
6 - Individual (London Forum of Civic & Amenity Societies) 3 & 4 - Small businesses/2	Yes	No, Not Effective	The offer of low starter rents is welcome but it will not have any long term effects. Assets of community value, such as the traditional pub in Coberg Street, must be preserved if the heritage objectives are to be met. <i>Any scheme to build a new railway must avoid demolition of heritage buildings as well as residential homes at Euston.</i>	The EAP is not in a position to prevent the demolition of buildings that would result from the construction of railway infrastructure to be approved through the hybrid bill process. However, the production of the EAP has been informed by a Historic Area Assessment for Euston, which identifies a range of (designated and non-designated) heritage assets. The EAP seeks to protect and enhance heritage assets in the Euston area. No change proposed.
12 - Bloomsbury Conservation Area Advisory Committee			fig. 3.4, p. 50: this shows buildings of heights 9-10 storeys over most of the redeveloped station area - far	Euston Road itself accommodates a number of larger format buildings: the Euston Historic Area

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3.3 - Building heights/2			<p>too high. The concept should be that of a station building of architectural merit in its own right, like St. Pancras and Kings Cross. The remarks on the lack of architectural quality of the existing station suggest no appreciation of the importance of its low rise nature to the surrounding townscape, and the potential harmful nature of any high rise overdevelopment, especially on the historic townscape to the south of world renown known as 'Bloomsbury.' Indeed, the essentially horizontal form of the front block can be said to echo that of the traditional terraces, so characteristic of Bloomsbury and which are at the very core of its underlying character and attraction.</p>	<p>Assessment refers to the large scale institutions and commercial buildings on Euston Road (see pages 22 and 55) and the varying building heights and scales on Euston Road are reflected in the building heights shown on p41 of the Assessment.</p> <p>The Euston Station site is a designated opportunity/ growth area in the London Plan and the Camden Core Strategy, and is expected to deliver significant numbers of new homes and jobs. It also has excellent public transport accessibility and Central London location also make it an appropriate location for higher density development.</p> <p>These factors (as well as London View Management Framework) also need to be taken into account in assessing potential building heights.</p> <p>The EAP seeks to balance the delivery of growth with sensitivity to historic context. No change proposed.</p>
21 - City of Westminster 3.3 - Design strategy/3			<p>Design Strategy The City Council would like to ensure that any development within the Euston area has regard to its impact on the sensitive historic environment in Westminster, in particular the setting of Regent's Park. We welcome the recognition in the EAP of the need to protect strategic and local views and in particular support the reference in Building heights, massing and scale on page 49, to the requirement for an impact assessment to demonstrate any proposal will not unacceptably impact on strategic and local views (including views from adjoining boroughs, such as those from Regent's Park...).</p> <p>We also welcome the reference on page 49, for considering potential for view enhancement (where buildings currently detract from existing protected</p>	<p>Noted. Support welcomed. No change proposed.</p>

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			views, the consideration of the potential for redevelopment to contribute to the enhancement of these views will be encouraged).	
8 - English Heritage 3.3 - Tall buildings (p49)/3			<p>In general English Heritage welcomes the clarity provided on building heights proposed through the Euston Area Plan through a building heights plan and parameters for taller elements. The provision on page 49 of a rationale for the proposed height limit of 60 metres, which responds to our comments on the previous draft, is also welcomed.</p> <p>It is crucial that the 60 metre height parameter proposed, and the indicative heights shown in Figure 3.4, should be subject to consideration of local impacts. For example, buildings of 60 metres could be visible in local views, and have the potential to cause harm to heritage assets through impacts on the settings of listed buildings and conservation areas.</p> <p>It should be made clear in the third paragraph of page 49 that any proposals, even those which reflect the indicative building heights set out in Figure 3.4, should be rigorously tested for impacts on surrounding heritage assets, using the methodology set out in English Heritage's Guidance on the Setting of Heritage Assets (2011).</p> <p>Appendix 3 should then be cross-referenced as a piece of evidence which provides further detail on the potential for impacts from taller buildings on surrounding heritage assets.</p> <p><i>To reflect this we suggest that the paragraph be reworded as follows:</i></p> <p><i>"General heights that may be appropriate for new development are illustrated in figure 3.4, and are based on an analysis of the surrounding built context and modelling of potential impacts on strategic views and selected local views. The general heights shown would allow development that does not encroach into</i></p>	<p>Whilst Appendix 3 to the EAP Background Report provides an initial assessment of taller buildings in the locations identified in Figure 3.4 of the EAP, it is noted that further assessment of impacts on local views (as well as the London View Management Framework) would be needed as part of any planning application for development at Euston.</p> <p>It is therefore agreed the suggested changes should be made as proposed. It is suggested that the proposed reference to 'Appendix 3' should read "Appendix 3 of the EAP Background Report" for clarification.</p>

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			<p><i>background or foreground assessment areas identified in the London View Management Framework (LVMF). However, there may be impacts on local heritage assets which would need to be addressed (please see Appendix 3 for further detail). In the Background Assessment area there are potential locations for tall buildings (up to 60 metres) in the shadow of St Paul's Cathedral. However, a full justification and demonstration of impacts in terms of the requirements of the LVMF and local views would need to accompany proposals for tall buildings in these locations.</i></p> <p><i>The heights shown are measured from an average ground level using a general storey height of three metres; therefore where development is above station buildings or infrastructure this will need to be taken into consideration. Within the background assessment areas any building proposed taller than the general heights indicated in figure 3.4 Any proposals should be thoroughly tested against the LVMF. An impact assessment should demonstrate that the proposal does not unacceptably impact on strategic and local views (including views from adjoining boroughs, such as those from Regent's Park and views identified in the EAP Background Report), the character of the surrounding area including the settings of heritage assets (see English Heritage Guidance on the Setting of Heritage Assets, 2011), and that it contributes positively to the London skyline. Where buildings currently detract from existing protected views, the consideration of the potential for redevelopment to contribute to the enhancement of these views will be encouraged. Tall buildings should be designed to have a minimum impact on neighbouring properties and have a clearly defined relationship with the streets, buildings and uses around it."</i></p>	
10 - Licensed Taxi Drivers Association 3.4 - Taxi facilities/1	Yes	Yes	We note the commitment for further investigations with stakeholders over facilities for taxis and would be pleased to participate.	Noted. No change proposed.

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21 - City of Westminster 3.4 - Transport Strategy/2			<p>The City Council welcomes the Strategic Principle (EAP3) of providing a world class station and transport interchange at Euston. The City Council strongly supports the measures identified within EAP3 to mitigate the impacts of HS2 and meet demand from increased passenger numbers, including the provision of integrated transport services (underground, bus and taxi) and the delivery of Crossrail line 2.</p> <p>In its response to the consultation on the HS2 Environmental Statement, the City Council has welcomed the principle of a high speed rail network but has raised a number of detailed concerns. One of the issues the City Council is particularly concerned about is the impact of the proposed Euston terminus of HS2 and projected additional passenger demand in central London.</p> <p>As many HS2 passengers will have an origin or destination of their journey within Westminster, the Northern and Victoria Underground lines are of particular concern, as to their ability to deal with passenger numbers associated with HS2 (as also recognised within the EAP).</p> <p>The City Council will continue to press for the funding of Crossrail 2 and associated transport projects. We may also petition against the HS2 Hybrid Bill if the concerns about the impacts on central London are not resolved.</p>	<p>Noted. Support welcomed. No change proposed.</p>
22 - Ampthill TRA/ Individual 3.4 - Air pollution/11			<p>Strategic Principle EAP 3: Transport 3.1 Strategic Plan 4 We consider this to be unsound as it fails to state how the very high air pollution problems on the Euston Road will be addressed The London Plan Policy says there is a need to ensure no worsening of air pollution in areas where it is already high.</p> <p>The EAP needs to be strong enough to ensure that any developer's plans meet the criteria listed on page 52. Any plans for HSe need to be fully considered with the community and should provide the best possible social, economic and environmental outcomes for the existing community</p>	<p>The need to address air pollution in the Euston area is acknowledged, and Strategic Principle EAP3 seeks to address this by promoting walking and cycling and other more sustainable forms of transport, car free development, sustainable freight and the introduction of an ultra low emissions zone at Euston. Strategic Principle EAP 4 also seeks to mitigate air pollution by promoting the provision of green infrastructure (such as tree planting, green and brown roofs). Strategic Principle EAP3, and the other principles and guidance contained in the EAP, are being proposed in order to be used in</p>

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				<p>the assessment of development proposals in the area.</p> <p>In relation to Euston Road, Development Principle EAP2 seeks the creation of a more pleasant street environment for pedestrians and cyclists (see also p83 of Section 4.2), and the supporting text seeks to deliver a greener environment along Euston Road (see page 84). No change proposed.</p>
<p>15 - Thames Water</p> <p>3.5 - Water/2</p>		<p>No, Not Effective</p>	<p>[Section 3 - Development strategy - Section on Water on Page 62 and 63] Thames Water Supports the Section on Water on Page 62 and 63 Specifically the following section</p> <p>'Camden Council and the GLA will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to amenity impacts for existing users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is an infrastructure capacity constraint and no improvements are programmed by the water or wastewater company, the developer will be required to provide for the appropriate improvements which must be completed prior to occupation of the development.' However to offer clarification and to make the section more effective it is considered that the section heading should be changed.</p> <p><i>As above, to offer clarification and to make the section more effective it is considered that the section heading should be changed to state 'Water and Wastewater Infrastructure' and not just 'Water'.</i></p>	<p>This Section addresses a variety of issues in relation to water, including surface water flood management, water resources and wastewater infrastructure. It is therefore suggested that the heading is changed to: <u>"Flood risk, water and wastewater infrastructure"</u></p>
<p>15 - Thames Water</p>	<p>Yes</p>	<p>Yes</p>	<p>Thames Water Supports Policy EAP 4. Specifically the following section</p>	<p>Support welcomed. No change proposed.</p>

Representor No and Name Section and policy/site/para Representation No	Legally Comp.	Sound/ Why not	Text of representation and any changes required (in italics)	EAP Team Response and suggested changes* *Subject to discussion at the hearings and further consultation
3.5 (EAP4) - EAP4/1			'Surface water flood risk will be reduced in the Euston area through a range of measures including on-site measures on development sites and wider sustainable urban drainage provision. Water consumption should be minimised, and any increase in demand for off-site water and sewerage infrastructure will need to be met, either through existing capacity or timely provision of additional capacity.'	
23 - University College London (UCL) EAP4 - Transport/5			UCL strongly supports the proposal for a new sub-surface crossing from Euston Station to Euston Square station and the creation of a new station entrance on Gordon Street. The creation of this link will significantly improve permeability and connections from the station to UCL's core campus. UCL also supports the proposal for a pedestrian/ cycle only route along Gordon Street. This proposal would help create a friendly and safe environment for students, visitors and residents. The link is also identified in UCL's Bloomsbury Masterplan, which complements the EAP. UCL fully supports Strategic Principle EAP3: Transport in the proposed submission version of the EAP.	Support welcomed. No change proposed.
9 - Environment Agency 3.5 - Surface water flood risk/1	Yes	Yes	We support part B and C of the policy, that surface water flood risk will be reduced through on-site development measures and green infrastructure will be enhanced recognising the contribution it makes to urban drainage. The supporting text on page 62 under 'Water' makes reference to policy DP23 which is good as this policy requires developments to achieve greenfield runoff rates. <i>A suggested minor change would be to refer to the evidence base that shows the Euston Area to be at risk of surface water flooding e.g. Surface Water Management Plan (2011) and state that development sites should adhere to the recommendations of this plan, future National SuDs standards or any other relevant local standards.</i>	Amend the first paragraph under ;'Water' on p62 of the EAP to read: <u>"Camden's Flood Risk Management Strategy (2013) identified that t</u> There is some surface water flood risk in the area around Euston Station, therefore surface water management should be a design consideration in new development. Camden and the GLA will seek to ensure that surface water flooding risk is reduced in the Euston Area through on-site measures and wider provision across the area. Camden's requirements in relation to sustainable drainage systems (SuDS) is set out in policy DP23 (Water) of the Camden Development Policies. <u>Regard will also be given to the recommendations in Camden's Flood Risk Management Strategy and any future national or</u>

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				local SuDS standards in assessing future development proposals. By the time any major planning application takes place in the Euston area, Camden is also likely to be a SuDS approval body with responsibility for ensuring that drainage meets national standards."
6 - Individual (London Forum of Civic & Amenity Societies) 2, 4.1 - Flooding/4	Yes	No, Not Effective	<p>The plan correctly identifies the problem of surface water around Euston, but fails to address the question of whether the proposals would ameliorate this, and whether it would simply transfer the problem elsewhere.</p> <p><i>There needs to be an assessment of the impact of taller buildings and the extent to which more open space is needed to improve drainage.</i></p> <p><i>The plan should insist upon full sustainable urban drainage in the whole area with porous surfaces and drains to soakaways also, if the subsoil allows.</i></p>	<p>Page 62 of the EAP notes potential surface water flooding issues in the area, states that Camden and the GLA will seek to ensure that surface water flooding risk is reduced in the Euston area through on-site measures and wider provision across the area. It also states that surface water management should be a design consideration in new development. The EAP also highlights the role of green infrastructure in providing sustainable urban drainage, and seeks to maximise the provision of planting, green and brown roofs and replacement and new open spaces.</p> <p>Detailed requirements from new developments are set out in policy DP23 of the adopted Camden Development Policies, which requires development to reduce pressure on the combined sewer network, including through sustainable urban drainage.</p> <p>No change proposed.</p>
12 - Bloomsbury Conservation Area Advisory Committee 4.1 - Euston Arch/3			p. 74, Euston Arch: St. Pancras Church, the Wellcome Building, 1-9 Melton Street and Friends' House should be stated to be a compelling justification for the Euston Arch as they provide an appropriate setting for the reconstructed/restored arch.	<p>These buildings are not considered in themselves to necessarily provide a compelling justification for the arch. However, the Euston Area Plan allows for the reconstruction of the Arch, subject to viability considerations, and provides guidance relating to the appropriate positioning of the arch to reflect its historic location, should this be possible.</p> <p>No change proposed.</p>
18 - St Pancras Parish Church - /7			(Appendix provided- St Pancras Parish Church comments on the draft EAP, October 2013)	<p>Support welcomed.</p> <p>The issue of protecting those buried in St James's Gardens relates to the proposed loss of</p>

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			<p>1. We welcome the suggestion to reinstate the historic street pattern for Lancing St and Churchway as this will improve access to our church hall in Lancing Street for all the local community groups that use it. This will be a great improvement on the current street pattern where the cul-de-sac encourages some people to use the hall entranceway for rough sleeping or as a public toilet.</p> <p>2. We welcome the aim to protect 'buildings and groups of buildings of historic character ... which make a positive contribution to the streetscape.' St.Pancras Church clearly falls into this category. This classic Greek Revival building is now on the 'Heritage at Risk' register.</p> <p>3. We welcome the intention to improve building frontages in the Euston Road area, and especially the intention to 'improve the setting of and views to heritage assets, including the Church of St.Pancras (Grade 1 Listed).' The church frontages on Euston Road and Upper Woburn Place are badly in need of cleaning and renovation. In addition to this, large plane trees currently obscure views of the church from all directions.</p> <p>4. We welcome the commitment to improve the landscaping and biodiversity of open spaces in the area. We hope that the church gardens on Euston Road and Upper Woburn Place will be part of this development. Greater biodiversity would help the bees on our roof, assisting the planned Pollen Pathway through Central London.</p> <p>5. We also exercise a legal responsibility for the remains of the dead buried in St.James's Gardens. We feel strongly that the Gardens, along with any remaining listed structures in them, should be preserved.</p> <p>6. We welcome the plan to enlarge pavement space along the Euston Road and to create more pedestrian crossings across it. We would value improved pedestrian access from the east side of Eversholt Street to the east side of Upper Woburn Place to aid local primary schools on their regular visits to the church. (Work may be</p>	<p>the Gardens as a result of HS2. This issue sits outside of the EAP, which is a long term planning document, and instead will be dealt with separately through the Hybrid Bill process. No changes proposed.</p>

Representor No and Name Section and policy/site/para Representation No	Legally Comp.	Sound/ Why not	Text of representation and any changes required (<i>in italics</i>)	EAP Team Response and suggested changes* *Subject to discussion at the hearings and further consultation
			needed on the problematic tree roots at the south-east corner of Euston Road and Upper Woburn Place to facilitate this.)	
18 - St Pancras Parish Church - /6			Specific points from St Pancras Parish Church: Restoring the Propyleum would enhance the neoclassical road junction, partially restoring the setting for St Pancras Church. The plan does not include sufficient measures to safeguard the people buried in St James Gardens nor the unique Grade 1 building of St Pancras church against the impact of more noise and pollution from increased traffic along Euston Road. A brief examination of the north side of the building, particularly the caryatids, reveals the erosion and damage being caused.	Section 4.1 of the EAP provides guidance regarding the potential reconstruction of the Euston Arch, which is allowed for as part of indicative masterplanning (subject to viability considerations). See figures 4.1 and 2, and page 74 (Euston Arch). The issue of protecting those buried in St James's Gardens relates to the proposed loss of the Gardens as a result of HS2. This issue sits outside of the EAP, which is a long term planning document, and instead will be dealt with separately through the Hybrid Bill process. The EAP places an emphasis on enhancing the environment along Euston Road, including through greening of the public realm, in order to address air pollution (and to create a more pleasant environment for pedestrians and cyclists). No change proposed.
22 - Ampthill TRA/ Individual 4.1 - Buses/7			4.1 Transport and public realm Bus facilities It is vitally important while considering 'standing and turning for terminating services' that consideration is given not only to 'improve the setting of Euston Square Gardens, make the most of opportunities to enhance the public realm and contribute positively to the image and attractiveness of Euston as a gateway to London and major new desinations' and the need to 'balance the needs of bus users with a safe and attractive public realm environment for pedestrians and cyclists' that safety trumps all other considerations. The ES has indicated a bus stand for eight buses on the site of the old Royal Mail premises that are to be demolished. Local people see this as a very retrograde step which will contribute to difficulties for school children and those with mobility problems crossing Eversholt Street and which will endanger pedestrians, contribute to more congestion, air pollution and fuel consumption. The	The text referred to seeks to ensure that impacts of bus movements and infrastructure on the local community in terms of pedestrian safety and movement. Wherever bus stands are located, full consideration would need to be given to potential impacts on the public realm and community safety. Noted. No change proposed.

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			DDD2 desgn can accommodate a number of bus stands adjacent to the east side of the station.	
22 - Ampthill TRA/ Individual 4.1 - Crossrail/8			Station integration with Crossrail 2 It was astonishing to learn that HS2 Ltd have not yet made plans to integrate Crossrail 2 with their plans for Euston Station	The EAP supports the provision of Crossrail 2 as part of measures to help mitigate increased passengers numbers and we understand that provision for integration is included in HS2's designs. No change proposed.
22 - Ampthill TRA/ Individual 4.1 - Station design/3			Euston Station and tracks page xi Contrary to supposition that a reduced station footprint will reduce regeneration opportunities, while no formal analysis has been undertaken it is fully expected that DDD2 development opportunities will equal if not exceed the target for housing and jobs	No information or evidence has been presented to the EAP team to demonstrate that DDD2 development opportunities will equal if not exceed the target for housing and jobs at this stage, as we understand that work is still being developed to fully understand associated development potential. This statement, and the wider EAP would not preclude the delivery of DDD2. It is acknowledged that, whilst raising many of the same issues in terms of an 'Option 8' station design in terms of public realm and connectivity, it would bring benefits in terms of avoiding the demolitions currently associated with HS2 proposals. The following changes are therefore proposed in order to reflect this: Page xi "Euston Station and tracks: A comprehensive station redevelopment to transform Euston's image and potential for between 1,000 and approximately 1,900 new homes and between 7,200 and approximately 13,600 additional jobs depending on station design and footprint, railway constraints and cost of decking. A comprehensive approach to station design based around lowered tracks and platforms is more likely to allow for greater development and a transformational high quality development here. <u>A redevelopment within the existing station footprint would reduce the required demolitions and associated mitigation</u>

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				<p><u>requirements that would result from proposals on an expanded station footprint"</u></p> <p>page 31 (Development Strategy), "3: Redevelopment on existing station footprint "The redevelopment of Euston could be progressed within the existing station footprint, in the event that the HS2 project is not progressed, or with alternate design solutions <u>such as the community led Double Deck Down station design, with High Speed Two platforms and tracks at a lower level and Network Rail tracks at ground level. These options would reduce the required demolition of homes, business premises and open spaces and mitigation requirements associated with proposals on an expanded station footprint.</u> Therefore illustrations of how the principles for station design could be applied to the existing station footprint are also provided.</p> <p>Comparison The EAP Sustainability Appraisal which has been prepared alongside the EAP highlights the sustainability benefits of lowering the track and platforms and redeveloping the station to allow for the creation of new streets, open space and buildings above. The appraisal also highlights the benefits of a comprehensive approach to redeveloping the station area, even where the existing basic station infrastructure is fundamentally retained, but clearly shows the most benefits for the area can be secured through a scheme similar to the baseline or any level deck station design which lowers platforms and tracks. <u>It should also be noted that options to redevelop Euston Station on the existing station footprint would bring benefits in terms of avoiding demolitions and associated mitigation requirements, although such approaches would reduce the ability to provide new at-grade streets, open spaces and building entrances"</u></p>

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5 - Individual 4.1 - Euston Arch/1	Y	Y Positively Prepared	I am very supportive of the euston arch being rebuilt. This would in some way make up for the barbarism of the destruction of the station in the 1960s. It is a once in a life time opportunity and would be both a symbol of the past and an entrance to a station of the future.	Section 4.1 of the EAP provides guidance regarding the potential reconstruction of the Euston Arch, which is allowed for as part of indicative masterplanning (subject to viability considerations). See figures 4.1 and 2, and page 74 (Euston Arch). No change proposed.
2 - Railway Heritage Trust 4.1 (Figure 4.1)/3			We also note that all your plans include some form of North – South route from Euston Grove across the top of the station, and most of the plans indicate a 'kink' in this route immediately to the north of the putative new Arch. <i>We would suggest that the route be moved to the east so that that it flows naturally into the former alignment of Euston Grove from the north, or that, if a kink is necessary, it should be some way to the north of the arch. Drawing 4.3 shows this option, with the kink at the line of Drummond Street, and we commend this in preference to the kink immediately to the north of the memorial shown in drawing 4.1.</i>	Figure 4.1 provides a high level illustration of principles, and the blocks shown are indicative development zones only, and therefore the location of the arch is not necessarily to be read as forming the edge of a specific development plot, rather than being part of a zone in which commercial led mixed uses will be supported, set within a wider grid of streets and spaces. Suggest that the key is amended to reflects this as follows: 'Area for Commercial led mixed-use development'; and 'Area for Residential led mixed-use development'.
24 - Euston Estates (Sydney and London) 4.1 Euston Station			Atkins Limited has been asked to review the submission draft Euston Area Plan on behalf of our clients, Sydney and London Properties Limited. Sydney and London Properties are project managing the Euston Vision Masterplan and response to the High Speed 2 proposals, on behalf of Euston Estate (GP) Limited who have a long lease on the Euston Estate. The Euston Estate consists of the properties between Euston Station and Euston Road: One Euston Square (formerly 40 Melton Street), and One Eversholt Street, including the tower and the podium above the current bus station. Grant Thornton House, also forms part of the Euston Estate, the long lease of which belongs to Stanright Limited and Balfe Limited. Grant Thornton House is also project managed by Sydney and London Properties. Whilst we broadly welcome the overall increased levels	The indicative number of homes, jobs and related floorspace stated in the Euston Area Plan for the station area is based on the estimated capacity for development above the station taking into account the various constraints here. These include, high level consideration of the station/railway engineering constraints, Camden's LDF requirements for provision of open space, education and social facilities, design, heritage and townscape considerations and the constraints resulting from the Mayor's protected viewing corridors and background assessment area which cover much of the station area. A high level viability assessment has been carried out to support the quantity of

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			<p>of development proposed for the Euston area, we are still concerned that the proposed quantum of development set out in the proposed submission draft plan is not ambitious enough as far as the station is concerned. The proposed submission draft EAP proposes a comprehensive redevelopment of the existing Euston station, providing between 1,000 and approximately 1,900 new homes and between 7,200 and approximately 13,600 additional jobs depending on station design and footprint, railway constraints and cost of decking.</p> <p>However, as demonstrated by the original Euston Vision Masterplan a comprehensive redevelopment of the existing station alone has the potential to provide for 1,500 residential units, 60,000 square metres of retail space and 128,000 square metres of office space. If this were to be added to a scheme to develop above the HS2 station at Euston, an area identified in the London Plan as an 'Opportunity Area' with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility, we believe that, with sensitive design, a development totalling approximately 3,900 residential units, 285,000 square metres of employment floor space, and 58,000 square metres of retail floor space could be achieved. We consider that this would equate to gross employment generated by the proposed office and retail floorspace on the station site alone of 27,100 jobs (23,900 generated by the office floorspace and 3,900 by the retail floorspace).</p> <p>We are concerned that the aspirations of the submission draft Euston Area Plan as currently framed will not allow sufficient value to be achieved from the proposal to facilitate a comprehensive development of Euston station as a world class terminal for a 21st century railway.</p> <p>We trust that these comments are of use and we would be happy to discuss these points further once they have</p>	<p>development shown in the EAP taking into account an estimated cost for building the deck for development. The EAP provides an approximate upper capacity estimate based on this work.</p> <p>The plan recognises that there may be potential for some taller buildings to the north east and south west of the station area, however if taller buildings are proposed here, or in other locations around the station, applicants would need to fully test their impacts against the London View Management Framework, and demonstrate how the proposals would fulfil wider design and EAP policy criteria and other Camden and London Plan policy. Capacity associated with this has therefore not been taken into account as there is no evidence that impacts would be acceptable at this stage.</p> <p>No changes proposed.</p>

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12 - Bloomsbury Conservation Area Advisory Committee 4.2 - Heritage/4			been received. p. 80: it should be stated that these commercial, research and institutional buildings, which include the Wellcome Building, 1-9 Melton Street, Friends' House, and British Library, are also of architectural and heritage importance.	Amend the third bullet point on p80 (under 'context') to read: It contains a number of designated heritage assets including the Grade I Listed Church of St Pancras and the Grade II* Listed Euston Fire Station, and is partly covered by Bloomsbury Conservation Area. <u>A number of buildings associated with commercial, research and institutional occupiers, notably the Wellcome Building, 1-9 Melton Street (Grade II* listed), Friends' House (Grade II listed), and the British Library, are also of architectural and heritage importance.</u>
12 - Bloomsbury Conservation Area Advisory Committee 4.2 - Euston Square Gardens/5			p. 80: it should also be stated that the original configuration of Euston Square Gardens should be taken into account as the basis for all future decisions taken on the basis of historic design.	The EAP already states on p84 that "Proposals for the Gardens should be informed by a detailed study of their historic significance, including the original layout and the extent of remaining original fabric...". However clarifications to the text are proposed as set out in response to representor 12, comment 7.
12 - Bloomsbury Conservation Area Advisory Committee 4.2/6			Enhancing Heritage Assets, p. 82: 1-9 Melton Street, 14-15 Melton Street, Friends House and Wellcome Building should also be specifically mentioned here. Also the Georgian Grade II listed 14-15 Melton Street in particular are rare survivors of early development of Euston Square. The former Euston Underground Station is also one of a limited number of fine Leslie Green stations.	It is agreed that it would be appropriate to refer to the listed buildings mentioned, given potential impacts associated with development and change around Euston Station and Euston Road. Amend the text under 'enhancing heritage assets' to read: "Improve the setting of, and views to, heritage assets, including the Church of St Pancras (Grade I Listed), Euston Fire Station (Grade II* Listed), <u>1-9 Melton Street (Grade II* listed), 14-15 Melton Street, Friends House (173-177 Euston Road, Grade II listed)</u> , and listed features within Euston Square Gardens." As the Wellcome Building is not listed and slightly away from the station site, and the

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12 - Bloomsbury Conservation Area Advisory Committee 4.2 - Euston Square Gardens/7			Environment, p. 84: after 'its status as a historic London square', add: 'by enhancing its setting by reference to the original plan and layout of Euston Square'.	<p>Leslie Green station is also not listed and within the current anticipated HS2 footprint, it is considered that these should not be specifically mentioned, although they would still qualify as 'heritage assets' as mentioned in the text.</p> <p>The EAP already states on p84 that "Proposals for the Gardens should be informed by a detailed study of their historic significance, including the original layout and the extent of remaining original fabric...". However, as a precursor to this, the text immediately below 'Reinstating and improving Euston Square Gardens' could be amended to read:</p> <p>"Euston Square Gardens could be improved to provide an enhanced entrance to Euston Station, and reinforce its role as an important green space and its status as a historic London Square. <u>This should include reference to the original plan and layout of the Gardens.</u> The gardens should be retained and improved, however if HS2 requires their use to enable construction of the HS2 project they should be fully reinstated following completion."</p>
12 - Bloomsbury Conservation Area Advisory Committee Heritage/8			<p>Note: the historic architectural importance of the Bloomsbury Conservation Area, which includes Euston Square Gardens, needs to be stated and emphasised as the basis of this Plan. Its streets and squares are an early example of town planning of not just national, but international importance. Famous architects of the area include Nicholas Barbon, Jacob Leroux, Robert Adam, George Dance the Younger, Thomas Leverton, James Burton, S.P. Cockerell, Joseph Kay, Thomas Cubitt, John Nash, Humphrey Repton, Sir Robert and Sydney Smirke and Sir John Burnet. There is a huge number and density of listed buildings in the part of Bloomsbury that borders on Euston Road. These constitute a very significant part of our national heritage. The importance of the area cannot be overstated and any redevelopment plan for the Euston Road Character Area must take full</p>	<p>The historic and architectural context of the area, including heritage assets in the Bloomsbury conservation area have been taken into account during the preparation of the EAP, informed by the production of the Euston Historic Area Assessment (HAA). The Background Report and HAA provide further information regarding this context.</p> <p>The EAP places an emphasis on protecting and enhancing heritage assets and their settings, which is made clear in Strategy Principle EAP2 (Design) part B, and various other sections including Section 4.2 (Euston Road - see p82 Enhancing heritage assets).</p> <p>No changes proposed.</p>

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3 - Canal and River Trust (London) - /1a			<p>and sensitive account of this context in terms of scale, design and materials in order to protect it and neighbouring areas from harm for the benefit of future generations.</p> <p>Comments on draft Euston Area Plan (2013) In LB Camden we own and manage the Regent's Canal and its towpath, which is not directly adjacent to the plan area, but we have some comments, which we hope will be helpful, below:</p> <p>Heritage</p> <p>As previously mentioned, with regard to the plan area, we note that the north eastern boundary of the area comes close to the old Cumberland branch of the Regent's Canal. This should be picked up through the historic area assessment, and the impact of the work on the former canal and any archaeology associated with it, should be assessed and mitigation put in place.</p> <p>Moorings</p> <p>There may be potential for extending Cumberland Basin to provide additional moorings, for which there is a significant demand in London.</p> <p>Cycling and Alternative Routes</p> <p>The Regent's Canal is an extremely popular route for cyclists, and at peak times, this can cause some conflict with other towpath users. Our Enterrise team are therefore looking to promote alternative cycling routes. Euston Road is the most direct alternative route but is not a pleasant environment for cyclists. We note that you refer to improving the pedestrian and cycling experience along Euston Road by making it 'greener' and improving crossings and north-south connections. For this route to attract any cyclists off the canal it would need to provide fully segregated cycling facilities. Even with traffic, Euston Road is the quickest route from Paddington/ Lisson Grove to Angel, is easy to follow and</p>	<p>The Euston Historic Area Assessment sets out relevant heritage assets associated with the old Cumberland branch of the Regent's Canal. The assessment (along with further analysis by the EAP team) did not identify any impacts of development on the former canal and any associated archaeology.</p> <p>Land at Goldsmith's House and adjoining land on the Cumberland Market Estate is identified in the Camden site allocations document (Site 15), and occupies backfilled land from the former Cumberland canal basin.</p> <p>Whilst Camden Council seeks to preserve and enhance Regent's Canal (see Core Strategy policy CS15), the canal (including the remaining part of the Cumberland Basin) is located outside of the EAP plan area. It is therefore not considered appropriate for the EAP to refer to scope for additional moorings, as this would be outside the scope of the EAP.</p> <p>The EAP seeks to promote enhanced pedestrian and cyclist connectivity across and along Euston Road. the supporting text to Development Principle EAP2 includes provision for "Improvements to existing east-west routes through the introduction of Advanced Stop Lines where they are not currently provided and improved cycle safety, through cycle lanes and enforcement where alterations to the building line or road allow" (see page 83 of the EAP).</p> <p>No changes proposed</p>

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			is very direct and could provide a real alternative, particularly for people who want to cycle in a hurry. It also by-passes the Islington Tunnel which is a barrier for people in terms of way-finding.	
13 - HS2 Ltd 4.4 - Open space provision/11	Yes	No, Not Effective	<p>[Key Principles (page xi) Drummond Street and Hampstead Road - Reprovision 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 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.</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</i></p>	<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's ES and mitigation process at this point in the plan.</p> <p>No change proposed.</p>

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			<i>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>	
13 - HS2 Ltd 4.4 - Drummond Street (funding proposed works)/10	Yes	No, Not Effective	<p>[4.4 - Delivery Strategy - Drummond Street Pedestrian Priority (97) - Funding of proposed works to Drummond Street]</p> <p>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>and 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.</u> Delivery would be towards the end of the plan period following HS2 construction."</p>
14 - Drummond Street Traders Association			We as the Drummond Street traders find it quite harmful to our business if we do not have drive through road. I am sending this email to object the page 96 of the	The draft EAP was amended in response to previous comments in order to remove reference to pedestrian-only access, with the proposed

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4.4 - Drummond Street pedestrian priority/1			<p>area plan, where it says Drummond Street area public realm. It is very vital for us to have drive through road. Most of our customers are driving in at the weekends and in the evening. Our deliveries different time of the days and evening.</p> <p>I hope this comments will be considered and not ignored like when the process was done for the plan.</p>	<p>submission version of the EAP version instead to pedestrian priority while allowing for appropriate local vehicular access. This change was made in order to address previous concerns expressed regarding the need to allow people to access the street by vehicle, while seeking to protect Drummond Street from potentially significant impacts associated with through-traffic from a much larger Euston Station. Any restrictions to through traffic will be discussed with local businesses to consider the types of vehicle restrictions and timings. The following further amendment is suggested:</p> <p>"Public realm improvements will be sought for the area including Drummond Street, Euston Street and Stephenson Way. In association with this, Drummond Street/Euston Street <u>will be designed as a pedestrian and cycle friendly place with a high quality public realm and appropriate traffic management measures to make it a successful and vibrant place.</u> will be given pedestrian priority with through traffic restricted,"</p>
13 - HS2 Ltd 4.5 - Regent's Park Estate/8	Yes	No, Not Justified	<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</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</p>

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			<p>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>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 p98:</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. Further work is needed by HS2 and Camden to consider the implications of construction on these blocks. <u>The HS2 Hybrid Bill process will determine the impact and appropriate mitigation for these adjacent blocks if it is demonstrated that they are affected.</u> If these blocks are redeveloped..."</p>
<p>22 - Ampthill TRA/ Individual 4.5 - Housing/ open space/9</p>			<p>4.5 Regents Park Estate While all are agreed that displaced residents should be housing locally if they so wish, the necessity to locate replacement housing locally requires a loss of green space in Regents Park and resultant reduction of community amenity. It should be noted that the DDD2 design requires no loss of council homes due to demolition.</p>	<p>Noted. The timescales associated with the delivery of replacement housing in the local area prior to the demolition of homes, and the built up nature of the area, mean that it currently clear sites would be needed. Strategic Principle EAP 4 and supporting text seek to ensure that an estate wide strategy for open space provision is taken forward alongside housing infill development.</p> <p>No change proposed.</p>
<p>22 - Ampthill TRA/ Individual 4.6 - Ampthill/10</p>			<p>4.6 Ampthill Square and Mornington Crescent Station p104 As a resident on Ampthill Square estate I can categorically state that no mention was made of the plans 'to enhance the design and layout of the estate to make it easier to move around'. The indicated east-west routes were not advised to the community at any time and these have been included despite the significant regeneration of the estate including the highest priority to provide an effective comprehensive</p>	<p>The proposals for enhanced links and infill housing were included in the 2013 draft EAP, which was consulted on from July-October 2013. The July 2013 draft EAP included the statement in policy EAP6 that "proposals should... enhance the design and layout of the estate to make it easier to move around", and showed enhanced existing links through Ampthill, as well as potential new residential development, in Figure 4.12 . These proposals are repeated in Figure</p>

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			<p>security system. One east west route is accessible during daylight hours. Given the historic incidence of ASB, drug dealing and gang fighting on the Ampthill Square estate, such plans are at odds with the community priority to be able to enjoy reasonable enjoyment of their homes in a safe environment. The suggestion of infill housing was never brought to our attention although suggested housing to incorporate a replacement community hall along the edge of the south-west estate was indicated. Ampthill residents were not provided with this information and neither did the workshop on the EAP at the H-Pod in October 2013. What was agreed at that workshop was that safety on Ampthill was number one priority of residents and should not be compromised. It is therefore disturbing to discover EAP plans directly contravening this. The DDD2 plan incorporates a bus stand alongside and to the east of Euston Station</p>	<p>4.7 of the proposed submission EAP (with a slightly amended configuration of residential development). The respondent (22) commented on the draft EAP in summer 2013, and highlighted the need to ensure that any plan for the Euston environs does not compromise security on the estate. In relation to proposed housing on Barnby Street/ Ampthill Square, the respondent (22) commented that there is clearly a great need for additional housing, especially social housing, but highlighted a need to avoid gentrification and the need to consider security. In response to these comments on the draft EAP, the proposed submission version of the Plan was amended to acknowledge the need to address community safety and security issues associated with enhanced links at Ampthill : on page 106 the proposed submission EAP states: "Reinstating the historic street patterns: New development should help to reinstate the historic street pattern to improve enhance, protect and improve the accessibility, legibility and way finding of Ampthill and Harrington Squares, whilst ensuring safety and security of residents is not compromised." No change proposed.</p>
<p>13 - HS2 Ltd 4.7 - Churchway (open space)/9</p>	<p>Yes</p>	<p>No, Not Effective</p>	<p>[4.7: Environment, Open Space (page 111) - Replacement public open space on the Churchway Estate] 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,</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: <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>

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			<p>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><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>	
4 - Individual (BBC) - /2			Leaseholders will lose their homes and/or have 10 years of disturbance. No one had bothered to advise us.	<p>No decisions have been made regarding any potential redevelopment at Churchway, which will be investigated working with the local community.</p> <p>As part of all stages of consultation on the EAP, letters have been sent to residents of the Churchway Estate to notify them of consultation and let them know how to view details and respond.</p> <p>If any further options for Churchway development are considered Camden's Housing</p>

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				department will undertake separate detailed consultation. No change proposed.
4 - Individual (BBC) 4.7 - Churchway/1	Yes	No, Not Effective	<p>There is an implication that the Churchway Estate is going to be knocked-down but it is not clear. On contacting the Hs2 team I have been told resoundly that there are no plans to do so. There is an inconsistency in the message. People are worried about their homes and businesses first and foremost.</p> <p>I want to see a document that explains what is going to happen to my home and what kind of compensation is available and how to go about claiming BEFORE seeing a big arrow going through my home.</p> <p>I'm sure that this is not the right forum for this but I don't know what is.</p>	<p>The Churchway Estate is not within the HS2 safeguarding area and it is not envisaged that its demolition would be required as a result of HS2, although there may be disruption in the area associated with the construction of HS2. Camden's Somers Town Community Investment programme is a regeneration strategy that is being developed to use the land assets to address the priorities of local people including new housing, the rebuilding of a school, community safety, access to jobs and training and open space has been approved by Camden Council. As part of this work, Camden will assess whether there may be the potential to deliver additional homes on the site through redevelopment, in consultation with local residents. However, no decisions regarding the future of Churchway have been made. The EAP seeks to acknowledge this wider investigative work, while emphasising that future investigation of any opportunities will take place with local residents.</p> <p>Development Principle EAP7 therefore states that "opportunities for the renewal/intensification of Churchway Estate will be investigated working with the local community". The supporting text (p110) adds: "Churchway: opportunities for renewal and intensification of the Churchway Estate will be explored with residents and the local community"</p> <p>No change proposed.</p>
8 - English Heritage - /2			Since the publication of the consultation draft further detail has been added to the tall buildings evidence paper within the Background Report, Appendix 3. This section, and the policy implications which fall from it, are the focus of our representations; we have concerns	Detailed concerns addressed below.

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			<p>that the modelling provided suggests, within certain local views, the potential for harm to heritage assets as a result of impacts on settings, contradicting some of the key findings contained in the Appendix. We are also concerned that the methodology provided for the modelling is not sufficiently informed by considerations of impacts on the setting of heritage assets to be considered fully robust. We set out our concerns in more detail below.</p>	
<p>8 - English Heritage Background Report Appendix 3/4</p>			<p>As set out in English Heritage/CABE's Guidance on Tall Buildings, we encourage Local Authorities to model the impacts of building heights and forms to inform the decision-making and place-making process as part of a development plan-led approach to the management of tall buildings (paragraph 2.9). We are therefore pleased that the Council has decided to model the impacts of the taller elements proposed within the Euston Area Plan; the Euston Area and its surrounds are particularly sensitive to impacts on heritage assets given the high concentration of listed buildings, including many listed Grade I and II*, and designated Areas such as Conservation Areas and Registered Parks.</p> <p>However, it is crucial that such modelling is carried out in a comprehensive manner, to ensure that the conclusions drawn can be considered to be robust and reliable. We have concerns that the current draft does not provide a sufficient assessment of impacts on the settings of heritage assets in local views. English Heritage has published Guidance on the Setting of Heritage Assets (2011) to assist Local Authorities and developers in identifying the impacts of potential development proposals on the historic significance of heritage assets. The methodology set out in the document is widely used by the development sector and we would encourage the Borough to adopt it within this modelling exercise. Below we provide more detailed suggestions on how the methodology could be made more robust, in line with this guidance.</p> <p>Following from these observations we would question</p>	<p>Please see response against individual comments below</p>

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			<p>some of the conclusions drawn in Appendix 3 and would urge the Council to revisit them following our recommendations above. In its current form, English Heritage would not support some of the conclusions drawn in the Appendix.</p> <p>We have therefore made a number of suggestions which we hope the Council would consider as the basis for a revised draft.</p>	
<p>8 - English Heritage</p> <p>Background Report Appendix 3/5</p>			<p>Introduction</p> <p>Given the importance of this appendix in identifying parameters of development we would recommend that the introductory paragraph be extended to provide a more comprehensive explanation of the context for this study. It should note the sensitivity of the Euston Area and its surroundings due to the high concentration of heritage assets; offer a brief synopsis of the policy background to the tall buildings modelling, including relevant references from English Heritage/CABE's Guidance on Tall Buildings (2007), English Heritage's Guidance on the Setting of Heritage Assets (2011) and Seeing the History in the View (2011); and establish a definition of 'tall buildings', with reference to those provided in the local plan and in the London Plan. Relevant factors in determining the acceptability of taller buildings should include the impact on the settings of all relevant heritage assets (listed buildings, scheduled monuments, registered parks and gardens and conservation areas).</p>	<p>It is proposed to amend Appendix 3 of the Background Report to reflect these comments with additional text highlighting policy requirements.</p>
<p>8 - English Heritage</p> <p>Background Report Appendix 3/6</p>			<p>Methodology:</p> <p>This section should explain why a height of up to 60m is considered for assessment. Although this becomes clear later in the document, it appears unexplained at this point.</p>	<p>It is proposed to amend Appendix 3 of the Background Report to briefly explain why a height of up to 60 metres is considered for assessment by the addition of the following text: "<u>A building height of up to 60 metres has been considered for assessment because an initial views assessment has indicated that tall buildings up to 60 metres high could be located in specific areas (see section A) with limited impact on strategic views.</u>"</p>

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8 - English Heritage Background Report Appendix 3/7			<p>Part A – Tall Buildings and London View Management Framework Views</p> <p>We welcome the intention to establish and test indicative buildings heights parameters. However, the heights established should be clearly justified in the text to clarify why the building heights shown in figure 2 are considered acceptable.</p> <p>Views Assessments: for clarity the viewing corridors should be labelled as such, and in the format used within the LVMF. As currently shown they could be mistaken for the outline of a proposed building. In each case the 3D modelled views should be at the same scale as the photographic views.</p>	<p>It is proposed to add text to briefly set out how the building heights in Figure 2 were established by adding the following text: "<u>The building heights identified in figure 2 provide indicative overall height parameters that were informed by the initial assessment of the London View Management Framework Corridor, and through an ongoing high level assessment of the context of the area, in particular regarding urban design (such as prevailing building heights) and heritage (see Sections 7 and 8 of this Background Report).</u>"</p> <p>A key will be added to better explain the viewing corridors shown in the extracted images from the LVMF.</p> <p>Changing the scale of the model to match photographic views is not considered appropriate as it becomes hard to view the impacts - therefore it is not proposed to do this. However where images are differing scales this will be clearly stated. Further text will also be added to explain that more detailed testing of the impact of any proposals on the LVMF will be required as part of any planning applications proposing taller buildings in line with the LVMF methodology.</p>
8 - English Heritage Background Report Appendix 3/8			<p>Part B Tall buildings and local views Methodology: an explanation should be provided of how the local views identified. The location plan of taller buildings and local view points is welcomed, however we would suggest that the heritage assets plan be overlaid to show where views relate to the character and appearance of particular conservation areas and to the settings of listed structures.</p>	<p>Additional text is proposed to be added to the explain the the rationale for the local views selected and also to highlight that these views do not represent a finite list of views which may need to be tested when considering any planning applications in the future. Listed buildings and conservation areas will be overlaid onto the plan for ease of reference as suggested.</p>
8 - English Heritage Background Report Appendix 3/9			<p>Part B Tall buildings and local views Key findings: English Heritage does not support the conclusions drawn here, including whether taller buildings would not be considered to cause significant</p>	<p>It is proposed to amend the Background Report as requested, to identify areas where there may be potential for harm and avoiding judgement regarding likely impacts in advance of a planning</p>

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			<p>harm to certain local views. Given that harm cannot be ruled out at this stage, we would recommend that the conclusions be altered to simply state instances where there may be the potential for harm, rather than providing a judgement on the degree of harm this may cause. Specifically:</p> <p>3. "Taller buildings would be visible along Upper Woburn Place towards Eversholt Street but these views would not appear to significantly affect the setting or appearance of St Pancras Church." This judgement should be reserved until a planning application has come forward for consideration.</p> <p>5. "Whist taller buildings would also be visible from other local views from conservation areas, would not be considered to cause significant harm to these views". This judgement should be reserved for planning applications. However, we would consider proposals for taller elements shown in views 24 and 28 as harmful to the setting of Regents Park Registered Park and the listed terraces which front the park.</p>	application.
<p>8 - English Heritage Background Report Appendix 3/10</p>			<p>Part B Tall buildings and local views Local Views analysis:</p> <p>To fully understand the potential impacts on surrounding heritage assets, local views analysis should follow the methodology set out in English Heritage's Guidance on the Setting of Heritage Assets (2011). This would require:</p> <ul style="list-style-type: none"> • A photo of each view as existing; • Identification of the heritage assets present in each view identified, and the significance attributed to each, including by virtue of setting; and • The impact of proposals on the significance to be identified. <p>We suggest that each view be accompanied by a commentary providing an indication of possible impacts on significance.</p>	<p>In order to address these concerns it is proposed to identify key heritage assets in views and summarise their significance and setting issues, and the potential impacts of development on any views.</p> <p>Commentary will be added as suggested along with photos of the heritage assets identified as impacted on in the views.</p> <p>Additional text will also be added to highlight that the views selected are not an exhaustive selection and that other views may need to be tested for impact depending on the type of development proposed. Applicants should discuss the extent of views testing and information required with Camden, GLA and English Heritage on a site by site basis and should follow guidance set out in the wider planning policy framework.</p>

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			<p>For example:</p> <ul style="list-style-type: none"> • View 5: Gordon Street/Euston Road junction to Euston Station – the proposal shown could have settings impacts on the Royal College of General Practitioners, listed Grade II*. • View 10: There could be setting impacts on the Church of St Mary the Virgin, Grade II listed. • View 24: the terraces shown, viewed from Chester Road / Inner Circle junction looking east towards Euston Station are Grade I Listed. Proposals for a tall building visible above their rooflines would be considered as harm and would not be supported. 	
<p>11 - Natural England Sustainability Appraisal/3</p>			<p>As with our previous comments (dated 7th October 2013) the findings of the SA are arrived at using a methodology agreeable to Natural England and the points around ensuring High Speed 2 (whether it goes ahead or not) is beneficial to the areas of Euston and it's people and biodiversity.</p> <p>We look forward to being kept informed during the further stages of the examination in public and its eventual findings.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	<p>Comments noted. No change proposed.</p>