

Euston Area Plan

Schedule of minor modifications proposed

September 2014

SCHEDULE OF PROPOSED MODIFICATIONS

Public examination

On 10th April 2014 the Euston Area Plan was submitted to the Government for independent examination. Planning Inspector Derek Stebbing, BA Hons Dip EP MRTPI was appointed to examine the Area Action Plan on behalf of the Government.

Pauline Butcher is the Programme Officer for the examination. Any communications with the Inspector must take place through the Programme Officer, including communications from the Council and from people who have made representations on the Plan. Her contact details are.

Email ldfprogrammeofficer@tiscali.co.uk

post: The Programme Officer,
c/o London Borough of Camden
Placeshaping,
5PS, 2nd floor
Town Hall
Judd Street
London WC1H 8EQ

Proposed main modifications

As part of the examination, public hearings about the Euston Area Plan were held on Tuesday 1st July and Wednesday 2nd July 2014. A further part of the examination is consultation on Main Modifications to the Plan. This consultation is taking place from 8th September to 20th October 2014.

The Main Modifications have been prepared in the light of public representations made about the Plan up to 5th March 2014 and discussions at the public hearings. Alongside the Main Modifications we have also prepared a Map Modifications Appendix and a Sustainability Appraisal of the Main Modifications.

The Inspector will consider the Main Modifications and any comments you make about them before the examination ends. He will then complete his report of the examination. The report is likely to be issued in November 2014.

Proposed minor modifications

We have also prepared two further documents along with the Main Modifications. This schedule of Minor Modifications contains factual updates, points of clarification and other minor changes which do not, when taken together, materially affect the policies set out in the Plan. The tracked changes version of the Plan shows how the Plan will read if all the Main and Minor Modifications are made.

Please also note that the current consultation only relates to the proposed Main Modifications. Representations on other aspects of the Plan have already been considered. The Inspector will not be considering comments on the Minor Modifications, and at this stage he will not be able to take account of comments on the Plan as a whole.

N.B. Page numbers given in this schedule relate to the Euston Area Plan January 2014 as sent to the Government, and not to the September 2014 tracked changes version.

Find our more at www.eustonareaplan.info
or email us via eustonareaplan@camden.gov.uk

Euston Area Plan team
September 2014

Minor modifications

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
Mi1	ii		<p>Amend inside cover as follows: <i>Insert correct date of publication</i> <i>Delete reference to public consultation as follows:</i> "Public consultation 8th January — 5th March 2014" <i>Amend references to Strategic Board as follows:</i> <i>"Strategic Board</i> <i>Cllr Sarah Hayward (Leader of Camden Council)</i> <i>Sir Edward Lister (Deputy Mayor of London)</i> <i>Doug Oakervee/ David Higgins (Chair of HS2)"</i></p>	Corrections to reflect current stage and membership of EAP Strategic board	
Mi2	v	Contents	Update contents to reflect the addition of the Delivery Plans Summary table as an appendix, and number all appendices.	Update	
Mi3	ix	Executive summary	<p>Add to station design options text as follows under Development Strategy sub heading: <i>"Sub surface comprehensive station redevelopment – platforms and tracks sub surface to allow for ground level development above the station (HS2 original design/emerging HS2/Network Rail 2014 level deck design)</i> <i>New high speed terminus alongside existing station – retention of existing station and addition of new station on the western side (HS2 option shown in the <u>original 2013 HS2 Hybrid Bill</u>)</i> <i>Redevelopment on existing station footprint – redevelopment of the station on its existing footprint (either without HS2 or an <u>alternative station design such as a double deck design</u>)"</i></p>	To reflect the latest position in relation to station design	To reflect changes Requested by Inspector following discussions at Hearings

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Mi4	x	Executive summary	Amend text under 'Transport' as follows: <i>"Creation of a world class transport interchange at Euston Station with sustainable and appropriate onward travel options which meet the demands of increased passenger demands (including those from HS2) and general development in the area".</i>	Editing correction	
Mi5	xi	Euston Station and tracks	Amend text under 'Euston Station and tracks' as follows: <i>"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>"</i>	In response to representor 7 (Transport Salaried Staff Association) comment 1; representor 22 Amptill TRA) comment 5	Wording intended to address comments made regarding potential 'double deck' station design
Mi6	2	1	Amend first paragraph, last sentence on p2 as follows: <i>"In producing the plan Camden Council in no way accepts that the current HS2 proposition (HS2 Hybrid Bill submitted 2013) for Euston is acceptable and will continue to work to oppose it."</i>	Clarification regarding what is being referred to in relation to the 'current HS2 proposition'.	
Mi7	4	Objective 2	Amend objective 2 as follows: <i>"2. Securing excellent design: To work to ensure that any new station <u>and</u> or development is of excellent <u>integrated</u> design, easy to access, complements the character and heritage of the area, and helps to improve the image and function of the Euston area."</i>	To ensure it is clear that the new station design and development should be of excellent design.	Requested by Inspector following discussions at Hearings
Mi8	4	Objective 5	Amend objective 5 as follows: <i>5. <u>Boosting the local, wider London and national</u> economy by reinforcing existing economic assets and businesses:</i>	To ensure the objective is clear that development at Euston contribute positively to more than	Requested by Inspector following discussions at Hearings

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			<p><i>To provide new spaces for existing and new businesses and shops, and encourage new and innovative business sectors in the Euston area, such as knowledge and medical, to help achieve Camden Council's Knowledge Quarter aspiration for the area and could contribute to the Mayor's emerging "Med City" vision, along with creative industries, and securing significant new job and training opportunities for local people.</i></p>	<p>just the local economy.</p>	
Mi9	4	Objective 9	<p>Amend objective 9 as follows: 9. Enhancing existing public transport: <i>To provide encourage improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west.</i></p>	<p>To reflect need for improvements to public transport</p>	<p>Requested by Inspector following discussions at Hearings</p>
Mi10	5	1.3	<p>Amend Section 1.3 fourth paragraph onwards as follows: <i>The plan has been developed to be flexible reflecting the uncertainty around the delivery of HS2, which will only be confirmed once a HS2 Hybrid Bill becomes law, currently estimated as 2015. However, given central government support for the project, there is a reasonable probability that the project will go ahead. The EAP has been prepared with supporting technical information from HS2 on the emerging HS2 station design, as included in the HS2 Hybrid Bill and Environmental Statement and Design Refinement Consultation (November May 2013) and the previous HS2 station design (baseline, January 2013) and similar emerging level deck scheme (2014) which redesigned both the existing and new HS2 stations as one large new station with lowered tracks and platforms in January 2013. As mentioned previously, the new HS2 station design in the 2013 HS2 Hybrid Bill does not meet the EAP objectives as readily as previous HS2 a comprehensive level deck station designs. The EAP seeks to refine and shape the new any station design to better meet EAP objectives.</i> <i>If the previous a comprehensive level deck type scheme is reverted</i></p>	<p>To update the HS2 context</p>	<p>Requested by Inspector following discussions at Hearings</p>

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			<p><i>to (which would be preferred) or if the HS2 project does not go ahead at all, the plan provides principles and objectives that should be applied to any form of station redevelopment at Euston.</i></p> <p><i>The EAP will be monitored and reviewed for its effectiveness and can be reviewed and updated in whole or part if necessary due to significant changes to the station design which haven't been considered here, see section 5 of this document for details.</i></p>		
Mi11	5-6	1.3	<p>Amend text under 'Sustainability Appraisal and strategic options for Euston' as follows:</p> <p><i>The Sustainability Appraisal process has considered the sustainability merits of a number of strategic options for the production of new planning policy for Euston. This process concludes that there are significant sustainability benefits in producing a local plan for Euston, which enables the allocation and proper planning of additional growth above that indicated in Camden's Core Strategy and the London Plan as well as seeking to mitigate HS2 potential impacts. The HS2 project has significant potential to enable higher levels of growth than previously anticipated in the Euston area, and currently reflected in the Local Development Framework. However the <u>2013 HS2 Hybrid Bill</u> station design reduces this potential. There are also significant benefits to facilitating growth not just related to the station, but in the wider area, particularly in terms of opportunities to achieve regeneration objectives in surrounding estates and wider environmental improvements.</i></p> <p><i>The sustainability appraisal process highlights the wider benefits of a more comprehensive approach to station redevelopment, particularly the iterations of the previous HS2 proposals which allowed development and the creation of new streets above a largely sub surface station. Until the HS2 scheme receives Royal Assent the station concept is not confirmed, therefore the EAP retains flexibility for other station design scenarios.</i></p>	To provide clarification regarding the station design being referred to.	To reflect changes Requested by Inspector following discussions at Hearings.

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Mi12	15	Figure 2.2	Amend text on Figure 2.2 on p15 as follows: <i>"Grand Union <u>Regent's Canal</u>"</i>	In response to representor 3 (Canal and River Trust) comment 1	
Mi13	15,22	Figure 2.2 and 2.4	Update maps – amend boundary to south of Euston Road	Correct out of date boundary.	Requested by Inspector following discussions at Hearings
Mi14	16	2.2	Amend second to last bullet on page 16 as follows: <ul style="list-style-type: none"> <i>"To the south west, the Fitzrovia Area Action Plan is being produced has been adopted by Camden Council as a shared vision for the area, coordinating development proposals across a number of significant sites. The boundaries for the EAP and the Fitzrovia Area Action Plan meet on the southern side of Euston Road at the junction with Tottenham Court Road"</i> 	Update	
Mi15	23	Section 2.4	Amend Heritage text as follows: <ul style="list-style-type: none"> <i>The study area includes parts of three conservation areas, over 50 listed buildings and features, and five designated London Squares.</i> <i><u>At the southern end of the Euston Area Plan area is the Bloomsbury Conservation Area, which includes a cluster of listed buildings around Euston Road, including the Grade I Listed Church of St Pancras, the Grade II* Listed Euston fire Station and 1-9 Melton Street as well as a number of Grade II Listed buildings including Friends House and the Wellcome Building. Euston Square Gardens is a designated London Square, and contains a number of listed structures.</u></i> <i><u>In addition to Euston Square Gardens, the Euston Area Plan area includes Amptill Square, Harrington Square, Clarence Gardens and Munster Square all also London Squares.</u></i> <i><u>Elsewhere in the Euston Area Plan boundary are parts of the Camden Town Conservation Area (to the north and east) and the Regent's Park Conservation Area (to the west). At the meeting point of these conservation areas, a number of</u></i> 	To provide more detail on the historic context of the area, following discussion at EAP Hearing Sessions.	Requested by Inspector following discussions at Hearings

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			<p><u>important heritage assets surround the northern part of the Camden Cutting. These include Grade II* listed villas along Park Village East, Grade II listed terraces along Mornington Street, and the Grade II listed Parkway Tunnel and Cutting, which includes a short section of listed retaining wall to the very north of the cutting.</u></p> <ul style="list-style-type: none"> • <u>Other assets of historic significance in the Euston area include the fine grained areas around Drummond Street and Chalton Street, and St James’s Gardens open space, the and National Temperance Hospital site, and the inter war social housing estates of Somers Town and the Edwardian and inter-war institutional buildings which line Euston Road.</u> • <u>A number of important heritage assets outside the plan boundary are also noteworthy, in particular Regent’s Park, designated Grade I Historic Park and Garden, and nationally important Grade I Listed buildings that surround the park. Development would need to consider potential impacts on the setting of these heritage assets.</u> • <u>Heritage assets in the Euston area make an important contribution to local character, sense of place and identity. The importance of conserving and enhancing heritage in the EAP area was highlighted in community feedback received.</u> 		
Mi16	27	2.4	<p>Amend 3rd bullet under “Housing” to read: “215 216 (mainly affordable) homes would be lost as a result of HS2 due to the proposed westward expansion of Euston Station and tracks.”</p>	Update	
Mi17	27	2.4	<p>Add additional bullet point under “Environment” as follows:</p> <ul style="list-style-type: none"> • <u>A significant number of mature trees in open spaces and street trees are likely to be lost as a result of HS2.</u> 	Amendment to reflect potential impact of loss of open space on surface water flood risk, if not properly mitigated	
Mi18	27	2.4	<p>Amend first bullet point under ‘Open space’ as follows: “HS2 would result in the permanent loss of two thirds of St James’s Gardens open space as well as half <u>all</u> of Hampstead Road open space”</p>	Amendment to reflect information in HS2 Environmental Statement which indicates that all of Hampstead Road open	

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				space may be lost due to HS2	
Mi19	27	2.4	Amend second bullet point under 'Open space' as follows: <i>"The whole of St James Gardens, Hampstead Road open space and Euston Square Gardens will be temporarily lost as they are likely to be required to construct HS2 and therefore will not be useable for 10₁ years during the HS2 construction period"</i>	Amendment to reflect anticipated duration HS2 impacts	
Mi20	32	3.1	Amend bullet point 3 as follows: <ul style="list-style-type: none"> <i>"Enhancing Euston's role and image in the central London <u>and national</u> economy through world class station development and capitalising on the cluster of science and knowledge institutions already in the area"</i> 	To reflect changes agreed at the hearing	
Mi21	38	3.2	Insert the following new paragraph at the end of the 'Homes' section (immediately before the heading 'Economy and employment'): <i>"<u>Delivery information and indicative phasing for new and replacement housing referred to in this section is set out in detail in chapter 4, Places and also summarised on a site by site in appendix 1, Delivery Plans – Summary table"</u></i>	To cross reference the delivery plans table	
Mi22	38	3.2	Add the following sentence to the end of the first paragraph under 'Economy and employment': <i>"Whilst other uses such as shops and leisure uses also contribute to the economy and employment, these are addressed separately in the retail and leisure section below. <u>The majority of employment uses will be focused within the Euston Station and tracks area, therefore for commentary on the delivery of these elements please view section 4.1 of this plan, and appendix 1 to view the delivery plan summary table.</u>"</i>	To reflect changes agreed at the hearing and to refer to proposed delivery table	
Mi23	39	3.2	Amend the second and third paragraphs under '1. Amount and distribution of new employment floorspace' as follows: <i>"New employment uses will be focused at the Euston Station site, with further uses on the Euston Road Central London Frontage</i>	To reflect current situation in relation to lowering of platforms and tracks.	

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			<p>where opportunities emerge, and smaller scale uses in neighbourhood centres where appropriate. The mix of floorspace should include both B1a office floorspace and B1b research and development floorspace this should be focused around the station area. In recognition of the need for teaching facilities associated with the B1b research space, a proportion of this floorspace could be provided as education space (D1 use class). It should be demonstrated that the D1 uses are necessary to complement the core B1b research and development space, and helps to achieve the overall aspiration to create a knowledge based cluster of research and creative uses here.</p> <p>The total employment floorspace would provide higher delivery than that identified in the London Plan and the Camden Core Strategy, reflecting additional capacity identified as a result of the expanded Euston Station footprint and decking opportunities resulting from station redevelopment, with the higher level of floorspace possible if a scheme which lowers platforms and tracks is <u>progressed</u> reverted to."</p>		
Mi24	39	3.2	<p>Amend the second paragraph under 2 'Types of economic and employment floorspace' as follows:</p> <p>"Economic visioning work carried out in support of the Euston Area Plan (GVA, 2013) recommends that in order to develop a critical mass of knowledge based science/ research and creative uses in the Euston area, opportunities for at least 50,-70,000 sqm of knowledge sector space should be incorporated in future planning. In seeking to encourage a cluster of such uses, Camden and the GLA will therefore promote <u>seek</u> the provision of approximately 30% of the potential new commercial floorspace at Euston as knowledge based, science/ research and creative sector uses, including supporting educational facilities where required."</p>	Clarity of text.	
Mi25	39	3.2	Amend 2 nd paragraph under '2. Provision of new and replacement	Wording clarification and to provide appropriate	

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			<p>facilities to meet needs generated by development' as follows: <i>"In relation to children's services, the level of growth envisaged for the Euston area would be likely to create a need for in the region of 4 – 5 additional forms of entry (based on up to around 3,800 homes being delivered). This would include a need for additional primary school provision, which would need to be delivered through the <u>delivery provision</u> of new schools (possibly delivered as part of mixed use development) and/or the expansion of existing schools in the locality where feasible. In addition, there may also be a need for additional secondary school and further education provision, and financial contributions could therefore be required from new development towards enhancements to secondary school and other related provision within or close/related to the Euston area.</i></p> <p><i>New development in the Euston area would need to be supported by appropriate provision of healthcare facilities. The Euston Area Plan team has liaised with NHS North Central London to consider the implications of anticipated housing and employment growth for the provision of health infrastructure.</i></p> <p><i>Provision of higher education, medical, research and other institutional space will also be supported as part of a mix of uses on the Euston Station site (see Economy and employment above).</i></p> <p><i><u>Delivery information for social infrastructure referred to in this section is set out in detail in chapter 4, Places and also summarised on a site by site/project basis in appendix 1 in the delivery plans summary table."</u></i></p>	cross reference to delivery table	
Mi26	46	3.3	<p>Amend the fifth bullet point under Strategic Principle EAP2 (B) as follows:</p> <ul style="list-style-type: none"> • <i>"Ensuring that development is of the highest architectural quality and designed to be accessible to all."</i> 	Minor amendment to reflect importance of accessibility as a consideration in design	Internal suggestion
Mi27	49	Section 3.2	<p>Amend text on p49 to provide clarification that heights are based on ordnance survey (AOD) existing ground levels, and provide information on heights in metres – Please see main modification wording - MM11 for details of text changes.</p>	To provide clarification that heights are based on ordnance survey (AOD) existing ground levels,	Requested by Inspector following discussions at Hearings

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				and provide information on heights in metres	
Mi28	50	Figure 3.4	Amend key to Figure 3.4 as follows: <i>"9 - 10 storeys (27 - 30 metres)</i> <i>7 - 8 storeys (21 - 24 metres)</i> <i>5 - 6 storeys (15 - 18 metres)</i> <i>up to 4 storeys (up to 12 metres)"</i>	To provide clarification regarding building heights.	Requested by Inspector following discussions at Hearings
Mi29	51	Section 3.3	Amend second heading on p51 as follows: <i>"World Class station design and <u>integrated</u> above station development"</i>	Clarity	Requested by Inspector following discussions at Hearings
Mi30	52	Section 3.4	Add a new point under Strategic Principle EAP3 part (A) as follows: <ul style="list-style-type: none"> <i>"providing for the effective onward distribution of passengers;</i> <i>promoting sustainable travel; and</i> <i>improving accessibility and the local environment-; and</i> <i><u>providing new east-west links across the station and tracks site.</u>"</i> 	New east-west links across the station and tracks area is of central importance to the plan, this change ensures it is clear.	Requested by Inspector following discussions at Hearings
Mi31	53	Section 3.4	Update Figure 3.5 with latest transport proposal information.	Update	Requested by Inspector following discussions at Hearings
Mi32	59	Section 3.5	Add the following text at the end of Section 3.5: <i>"<u>Delivery information for transport infrastructure referred to in this section is set out in detail in chapter 4, Places where relevant and also summarised on a site by site basis in appendix 1 in the delivery plans summary table.</u>"</i>	To provide cross reference to the proposed Delivery table.	
Mi33	60	Section 3.5	Strategic Principle EAP4 - delete the 's' of heading word "Principles" so that it reads:	Correction	Requested by Inspector following

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			"Strategic Principle EAP 4: Environment and open space"		discussions at Hearings
Mi34	60	Section 3.5	Amend first bullet point under Strategic Principle EAP 4 part C as follows: <ul style="list-style-type: none"> <i>"Contribute to health and wellbeing and provide amenity value for residents, visitors and workers"</i> 	Minor amendment to acknowledge role of open space in relation to health and well being	Internal suggestion
Mi35	62	Section 3.5	In the last paragraph under 'Decentralised energy network' add text so that it reads: <i>"... does not create any local environmental issues, in particular in relation to air quality."</i>	Local air quality is of particular concern – this highlights this concern.	Requested by Inspector following discussions at Hearings
Mi36	62	3.5	Amend second title to read: <i>"Water Flood risk, water and wastewater infrastructure"</i>	In response to representor 15 (Thames Water) comment 2	
Mi37	62	3.5	Amend the first paragraph under ' <u>Water Flood risk, water and wastewater infrastructure</u> ' on p62 to read: <i>"Camden's Flood Risk Management Strategy (2013) identified that 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. Regard will also be given to the recommendations in Camden's Flood Risk Management Strategy and any future national or 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."</i>	In response to representor 9 (Environment Agency) comment 1	
Mi38	63	3.5	Amend the paragraph under 'Open space and green infrastructure' as follows:	To reflect the role and status of Regent's Park.	

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			<i>"Green infrastructure including the London Squares of Munster Square, Clarence Gardens, Euston Square Gardens, Harrington Square and part of Amptill Square, Regent's Park (designated Grade I Historic Park and Garden) and other open spaces such as St James Gardens and Cumberland Market provide valuable green and open space in this central London location. These spaces also plays a vital role in promoting biodiversity; meeting the health and well-being needs of the local community, reducing air pollution and noise; reducing the heat island effect; and in providing urban drainage. Green infrastructure includes open spaces, landscaping, urban green spaces and public realm; street trees; and green and brown walls and roofs. The EAP provides a framework for the medium and long term provision of new and replacement open space, where it is lost as a result of the construction of HS2. Open space is a hugely valued community amenity here."</i>		
Mi39	63	3.5	Amend last paragraph under '1. Re-provision of open space and biodiversity...' as follows: <i>"During To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any appropriate vacant spaces for appropriate active temporary open space uses, such as food growing/ allotments, play space and temporary public open space."</i>	Minor amendments to clarify approach to supporting temporary open space provision to mitigate HS2 construction impacts.	Internal suggestion
Mi40	64	3.5	Amend text under 'Euston Station Ultra Low Emission Zone' as follows: <i>"... By 2020 all buses in central London will be hybrid, with zero emission capable taxis, low emission options..."</i>	Minor amendment to reflect planned ULEZ measures	Internal suggestion
Mi41	67	4	Add <i>"Introduction"</i> title to the list of contents for the chapter.	Consistency	
Mi42	68	4	<i>Show existing railway lines on a key plan for chapter 4 to aid understanding of the plans and add introductory plans.</i>	To help people understand what the future plans look like compared with the existing urban fabric – responding to a community request at	Requested by Inspector following discussions at Hearings

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				EAP Hearings.	
Mi43	68-113	4	Re-number figure numbers throughout chapter to reflect additional figures added at the beginning of the chapter.	Update	
Mi44	68	4.1	Amend the last sentence of the last bullet point under 'Context' as follows: <ul style="list-style-type: none"> <i>"The previous original HS2 baseline scheme/emerging 2014 level deck scheme or an alternative scheme which lowers the platforms and tracks to enable development and new streets at ground level above would better support the EAP objectives."</i> 	To update the latest HS2 station design position	
Mi45	70	Figure 4.1	Amend key to Figure 4.1 (now figure 4.3) as follows and update figure number: <p><i>"Area for E-commercial led mixed-use development"</i></p> <p><i>"Area for R-residential led mixed-use development"</i></p>	In response to representor 2 (Railway Heritage trust) comment 3	Wording intended to clarify that the areas shown are indicative development zones only
Mi46	71	4.1	Add the following text at the end of the paragraph under 'Land uses': <p>"Knowledge economy priority: <i>There is potential for between 170,000 and approximately 270,000 sqm of employment floorspace, which includes the re-provision of existing commercial floorspace, above the new HS2 and redeveloped/refurbished existing station. At least 30% of this floorspace will be encouraged to be provided as either office or research space for knowledge based, innovative or creative industries to support the creation of a knowledge cluster in the Euston Road/King's Cross corridor (also see Strategic Principle EAP1 and supporting text at section 3.2).</i></p> <p>A mix of flexible office & research floorspace: <i>New grade A office space (B1a) should be provided with clear flexible floorplates to allow use by large corporates, academic institutions and innovative small businesses. Research and</i></p>	To provide appropriate cross referencing to the relevant Strategic Principles.	

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			<p><i>development floorspace (B1b) should be provided to support and attract existing expanding and new knowledge based, innovative and creative industries here. Some educational uses (D1) may be appropriate here where they are required to support the core B1b research and development space (also see Strategic Principle EAP1 and supporting text at section 3.2).</i></p> <p>Enhanced retail offer: <i>The majority of the potential total EAP retail floorspace is likely to be focused in this area (see Section 3.2). The station site could provide for a balance of A1 retail and A2-A5 uses. Provision should be outwards facing wherever possible, and contribute towards the creation of active streets and a vibrant public realm as well as providing for the needs of passengers. Careful consideration should be given to the relationship between additional retail and the role, character, vitality and viability of neighbouring centres. The exact amount and mix of retail proposed as part of development here should be supported by robust retail assessments in accordance with the requirements of the National Planning Policy Framework, which demonstrate that the proposed retail mixes do not negatively impact upon nearby centres and meets the needs of rail users and local people.</i> <i>Camden’s policies relating to small and independent retail (Development Policy DP10) should be addressed.</i></p> <p>Social infrastructure: <i>Contributions from new housing development will be required to assist the funding of a new 2FE primary school at <u>Camden Cutting</u> North Euston Cutting and potentially additional school facilities in the area (depending on the amount of housing proposed) to meet the combined needs of the potential new population in this area. Appropriate contributions towards the provision of community facilities will also be expected (also see Strategic Principle EAP1 and section 3.2 under “social infrastructure”).”</i></p>		
Mi47	75	4.1	<p>Amend text on right hand side of page 75 as follows (NB figure numbers for chapter 4 updated to reflect additional figures added): <i>“Managing demand and provision for taxis and private hire</i></p>	To provide appropriate cross referencing to sections elsewhere in the	

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			<p>vehicles:</p> <p>Whilst ensuring a high level of service for taxi users Camden and the Mayor will seek to try and reduce the impact which the vehicles have on the local area through:</p> <ul style="list-style-type: none"> • the use of taxi sharing and by promoting alternatives modes such as walk and cycling • encouraging the use of cleaner vehicles through the introduction of an Ultra Low Emissions Zone (ULEZ) and ensuring that ranking and pick up / drop off are carefully managed • focusing taxi movement on the station site, particularly new streets created, and away from predominantly residential uses. <p><u>Please also refer to section 3.4 for more details on the approach to taxi management in the area.</u></p> <p>Provision of new routes:</p> <p>New pedestrian and cycle routes should be facilitated by new development, as set out in detail in the design section above <u>and on figures 4.3, 3.3, 3.5, 3.6 and 3.8.</u></p> <p>Provision of cycle facilities to meet new demand:</p> <p>Cycle parking zones are proposed for key locations close to cycle routes, to help encourage cycling as a convenient way to travel to and from the station. The station site should provide significantly enhanced provision for cyclists in order to support an increase in the mode share of cycling from Euston Station, <u>see figure 4.3 and 3.5 for proposed locations.</u>"</p>	EAP.	
Mi48	76	4.1	<p>Amend the second sentence under 'New open spaces and amenity' as follows:</p> <p>"However, transport infrastructure constraints mean that it may be</p>	Amendment to acknowledge loss of Hampstead Road open	Internal suggestion

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
			<i>challenging to re-provide the open space lost at St James's Gardens and Hampstead Road Open Space or to meet all additional public open space demands on-site A key priority will be the replacement of St James's Gardens as open space as close to its original location as possible in the Drummond Street/Hampstead Road sub area....".</i>	space, as well as St James's Gardens	
Mi49	76	Section 4.1	Amend wording at the bottom paragraph under 'New open spaces and amenity space' as follows: <i>"Development towards the higher end of housing and employment capacities indicated in Development Principle EAP1 would lead to significantly higher levels of need for additional open space provision. Full consideration should therefore be given to the provision of additional open space on decking space above the tracks to the north of <u>Camden Cutting</u> North Euston Cutting (see Figure 4.4) as part of development proposals involving higher levels of development on the Euston Station and Tracks, either through direct provision or through a financial contribution, taking into account feasibility and viability issues."</i>	To clarify that proposals in the plan area should be able to largely meet open space requirements on site, but that full consideration of the provision of a new open space on the Camden Cutting deck to the north should also be considered, subject to viability.	Requested by Inspector following discussions at Hearings
Mi50	77	4.1	Add the following line immediately underneath the heading 'Delivery strategy' <i>"Detailed delivery information for the Euston Station and tracks area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi51	78	4.1	Amend the last paragraph on page 78 (under 'viability and funding') as follows: <i>"Further refinement on detailed design will help to address viability, however additional funding from the Government through extra funding for the HS2 station at Euston or other mechanisms may be required to help deliver all the EAP principles and objectives here. Further funding is likely to be required for HS2 if the more comprehensive HS2 baseline scheme/<u>emerging new 2014 level deck scheme</u> is <u>progressed</u> reverted to, but this could deliver higher levels of homes and jobs (at the upper end of the ranges set</i>	To provide updated reference to the latest station design context.	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
			<i>out in this document). There may also be other ways of delivering a comprehensive redevelopment of the station with lowered platforms and tracks on the existing site, through Network Rail /DfT working in tandem with the HS2 process. Delivery and funding options would need to be investigated."</i>		
Mi52	79	4.1	Amend the first two sentences underneath 'Euston Station redevelopment' as follows: <i>"The Department for Transport, HS2 Ltd and Network Rail will be critical in progressing any proposals for this area as well as Camden Council in its role as landowner (for some roads/areas) and planning authority. HS2 Ltd is responsible for..."</i>	Correction	
Mi53	79	4.1	Amend last sentence underneath the heading 'Infrastructure' as follows: <i>"See section 5.6 for information on the approach to S106 and CIL contributions."</i>	To provide more detailed cross referencing	
Mi54	80	4.2	Amend fourth bullet point under 'context' to read: <i>"Euston Square Gardens is an underused protected London Square fronting onto Euston Road and provides the setting to the Euston Station complex. While it accommodates significant levels of pedestrian movement, it is underused as a potential amenity space."</i>	Minor amendment to note that Euston Square Gardens is well used by pedestrians, but is underused as an amenity space	Internal suggestion
Mi55	82	4.2	Amend the text under 'Enhancing heritage assets' to read: <i>"Improve the setting of, and views to, heritage assets, including the Church of St Pancras (Grade I Listed), Euston Fire Station (Grade II* Listed), 1-9 Melton Street (Grade II* Listed), 14-15 Melton Street, Friends House (173-177 Euston Road, Grade II Listed), and listed features within Euston Square Gardens. <u>The relocation of the Stephenson Statue between the lodges will be encouraged</u>"</i> As the Wellcome Building is not listed and slightly away from the station site, and the Leslie Green station is also not listed and	In response to representor 12 (Bloomsbury Conservation Area Advisory Committee) comment 6, and to reflect proposed main modification to Development Principle EAP2 (reference to Stephenson Status)	Wording intended to provide requested references to these heritage assets.

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
			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.		
Mi56	84	4.2	Amend first paragraph under 'reinstating and improving Euston Square Gardens' as follows: <i>"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..."</i>	In response to representor 12 (Bloomsbury Conservation Area Advisory Committee) comment 7	Wording intended to provide requested references to original plan of Gardens.
Mi57	85	4.2	Add the following immediately underneath the heading 'Delivery Strategy': <i>"Detailed delivery information for the Euston Road area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi58	86	4.3	Amend bullet points under Context as follows: "Context: <ul style="list-style-type: none"> <i>Historic railway cutting largely owned by Network Rail. <u>The surrounding area is predominantly residential in nature.</u></i> <i>Camden Town and Regent's Park Conservation Areas bound the cutting</i> <i><u>Heritage assets surround the northern part of the cutting, including Grade II* listed villas along Park Village East, Grade II listed terraces along Mornington Street, and the Grade II listed Parkway Tunnel and Cutting, which includes a short section of listed retaining wall to the very north of the cutting.</u></i> <i>Numerous listed buildings, structures and <u>In addition, the cutting area contains a number of undesignated heritage assets including the walls along Mornington Terrace,</u></i> 	Minor amendments providing clarity in relation to context, to reflect the residential nature of the surrounding area, to note the existence of heritage assets around the North Euston Cutting, and to remove ambiguity in relation to undesignated heritage assets	Requested by Inspector following discussions at Hearings

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			<p><i>Clarkson Way and Park Village East, which have been identified as undesignated heritage assets through Camden Council's Local List process. Mornington Street Bridge itself is also an undesignated heritage asset, but the brick piers at either end are Grade II Listed Structures.</i></p> <ul style="list-style-type: none"> <i>Contains Site 11 Granby Terrace of the Camden Site Allocations document (this site would be lost as a result of HS2)"</i> 		
Mi59	86	Section 4.3	<p>Amend Development Principle EAP3 text, last sentence as follows:</p> <p><i>"Development proposals should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and scale."</i></p>	To reflect national conservation guidance language and aspirations	Requested by Inspector following discussions at Hearings
Mi60	90	Section 4.3	<p>Add the following sentence under 'New east-west links':</p> <p><i>"The design of new development should facilitate the creation of new east-west pedestrian and cycle links between Park Village East and Clarkson Row/Mornington Terrace to improve the permeability of the area.</i></p> <p><u><i>Park Village East should be extended to meet Hampstead Road, but as a local access route only."</i></u></p>	Clarification	Requested by Inspector following discussions at Hearings
Mi61	90	4.3	<p>Add the following sentence under the existing 'New open spaces and amenity space' text:</p> <p><i>"... This would enable the creation of a green cycle route from Euston to Camden Town, as well as a valuable amenity space for the existing and new community.</i></p> <p><u><i>Where it is not possible to deck over the cutting, the railway cutting should be able to be viewed from street level, through appropriately designed walls where compatible with railway safety and operations requirements."</i></u></p>	To note the preference of heritage and community groups to be able to see the railway cutting where there is no decking.	Requested by Inspector following discussions at Hearings

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
Mi62	91	4.3	Add the following immediately underneath the heading 'Delivery Strategy': <i>"Detailed delivery information for the Camden Cutting area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi63	91	4.3	Amend second paragraph under 'Viability and funding' as follows: <i>"Whilst there are engineering requirements associated with decking over railway tracks, HS2 Limited has indicated decking in this area would be feasible, although it may not be possible to deck over the cutting completely due to significant technical constraints. Section 5 Section 5.5 (Figure 5.1) of this report Plan indicates..."</i>	Clarification	
Mi64	93	4.4	Amend the last sentence under 'supporting meanwhile uses' as follows: <i>"In exceptional circumstances, a permanent change of use would be considered where it can be demonstrated that the use would no longer be viable due to the <u>changed context</u>, station building or use."</i>	Clarification, and to reflect earlier text regarding the relationship between changes context and meanwhile uses.	
Mi65	95	Section 4.4	Fig 4.5 (updated to figure 4.7) (option 3): correct map labelling for 'Cobourg Street'	Correction.	Requested by Inspector following discussions at Hearings
Mi66	97	4.4	Add the following immediately underneath the heading 'Delivery Strategy': <i>"Detailed delivery information for the Drummond Street and Hampstead Road area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi67	97	Section 4.4	Amend final bullet point under 'Phasing' – 'Long term (2024+)' as follows:	Correction	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
			<ul style="list-style-type: none"> "Replacement open space at <u>for St James Gardens</u>" 		
Mi68	98	Section 4.5	<p>Amend second bullet point under 'Context' as follows:</p> <ul style="list-style-type: none"> "Mix of building and unit types, set in landscaped space which creates <u>a</u> lack of clear definition between private space as well as building fronts and backs which creates <u>resulting in</u> community safety issues." 	Correction/ clarification.	
Mi69	98	Section 4.5	<p>Add a new bullet after the third bullet under 'Context' as follows:</p> <ul style="list-style-type: none"> "<u>Regent's Park, a designated Grade I Historic Park and Garden and part of a conservation area is immediately to the west of the estate. The estate boundary along Albany Street is adjacent to the rear of nationally important heritage assets such as the Grade I Chester Terrace.</u>" 	To recognise the nearby heritage assets of Regent's Park and the adjacent heritage assets	
Mi70	98	Section 4.5	<p>Amend sixth bullet point under 'Context' as follows:</p> <ul style="list-style-type: none"> "Significant HS2 construction impacts resulting in the loss of housing blocks within Regent's Park Estate (Eskdale, Silverdale and Ainsdale) and other properties including Stalbridge House and the Granby Terrace Depot, along with <u>the</u> loss of associated housing land, open space, play facilities and the Silverdale Tenants' Hall. At least 188 <u>191</u> homes will be lost on the estate with a further 153 close to construction. This combined with construction impacts <u>would have</u> has <u>a</u> significant impacts on the community here." 	Correction	
Mi71	98	4.5	<p>Amend the third bullet point in Development Principle EAP5 as follows:</p> <ul style="list-style-type: none"> "provide new open spaces and improve access and use of existing open space within the estate, taking opportunities to and enhance the legibility of the historic street pattern of the market squares..." 	Correction	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
Mi72	99	4.5	Amend text in first paragraph under 'Priority for replacement homes' as follows: <i>"Potentially 191188 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. The HS2 Hybrid Bill process will determine the impact and appropriate mitigation for these adjacent blocks if it is demonstrated that they are affected. If these blocks are redeveloped..."</i>	In response to representor 13 (HS2 Ltd) comment 8	Agreed with HS2, see EAP HS2 Statement of Common Ground
Mi73	101	Section 4.5	Figure 4.6 (updated to figure 4.8)- correction – William Road (not William Street)	Correction	Requested by Inspector following discussions at Hearings
	101 and 105	Section 4.5 / 4.6 (and throughout)	Plans - review alignment of Granby Terrace bridge on HS2 Hybrid Bill plans (bridge is shown slightly further north)	HS2 confirmed the bridge does not have to be built on exact alignment shown in Bill plans therefore not necessary to change plans.	Checked post hearing
Mi74	102	Section 4.5	Amend the first sentence under 'Environment' – 'Protecting and enhancing open space' as follows: <i>"The introduction of new and replacement housing on the estate, in addition to wider direct loss of open space as a result of HS2, will lead to a need for new and enhanced open space and sports/play provision in Regent's Park Estate and a comprehensive approach to landscaping and the public realm. An estate wide open space strategy should therefore be brought forward alongside proposals for infill housing development. The Council's brief to consultants looking at infill housing in the estate requires a landscape consultant to draw together a strategy to look at public realm, spaces and landscaping for all infill sites and the wider area as part of a coordinated approach. This approach should include the following measures:..."</i>	To ensure the brief for the Council's consultants looking at infill housing and open space is reflected in the text.	Requested by Inspector following discussions at Hearings

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
Mi75	102	4.5	Add the following immediately underneath the heading 'Delivery Strategy': <i>"Detailed delivery information for the Regent's Park Estate area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi76	103	4.5	Amend first bullet point under 'Delivery partners and mechanisms for key sites/projects' as follows: <ul style="list-style-type: none"> <i>"Regent's Park Estate: Camden Council will be the key delivery agent for new and replacement homes and their Community Investment Programme will be the key delivery mechanism working with HS2 where appropriate to mitigate housing lost. Further feasibility work and community involvement will be required to refine the potential for infill homes <u>and the approach to open space re-provision.</u>"</i> 	To reflect that further work will also relate to open space re-provision.	
Mi77	103	4.5	Amend last two bullet points under 'Delivery partners and mechanisms for key sites/projects' as follows: <ul style="list-style-type: none"> <i>"Temporary energy centre: To be provided in association with housing development here, progressed and funded through a combination of HS2 mitigation, Camden CIP and/or S106 contributions.</i> <i>Shop front improvements: Opportunities to secure funding from Lottery Funding, or support through the Regent's Park CIP work."</i> 	Clarification regarding delivery sources.	
Mi78	103,107,113,117	4.5-5.4	Amend references to short term as follows: "Short term: 2013 <u>2014 - 2018</u> "	Update	
Mi79	104	4.6	Add the following sentence to the end of the first bullet point under 'context': <ul style="list-style-type: none"> <i>"Amphill Square Estate is owned by Camden Council. It was built in the 1960s in an open plan layout with low community buildings interspersed with three tower blocks and includes a tenants and residents hall along its southern boundary. <u>The estate has had significant investment in the open space and security in recent years.</u>"</i> 	To reflect recent investment and associated discussion at hearing	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
Mi80	105 and 109	Section 4.6/ 4.7	Amend key for figures 4.7 and 4.8 (now updated to figures 4.9 and 4.10) to read " <u>Existing</u> paths through residential area(s)"	To clarify the type of route.	Requested by Inspector following discussions at Hearings
Mi81	105	Section 4.6	Alter routes illustrations on Figure 4.7 (updated to figure 4.9) to reflect publically accessible existing links during daylight hours.	To more accurately represent public access during daylight hours across the estate on figure 4.7	Requested by Inspector following discussions at Hearings
Mi82	106	4.6	Amend text under 'Enhancements to open spaces' as follows: <i>"HS2 Ltd, along with nNew developments in theis area should contribute towards improvements to existing open spaces in the area at Amphill Square and Harrington Square</i>	Amendment to reflect potential for mitigation funds from HS2 to contribute towards public realm improvements	Internal suggestion
Mi83	107	4.6	Add the following immediately underneath the heading 'Delivery Strategy': <i>"Detailed delivery information for the Amphill and Mornington Crescent station area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi84	110	4.7	Amend text under 'Design' – 'Reinstate historic street patterns' as follows: <i>"Reinstate historic street pattern particularly at Churchway and Lancing Street to achieve improved cycling and walking <u>and to create active streets and routes."</u></i>	Correction	
Mi85	111	4.7	Amend text under 'Design' – 'Drummond Crescent design' as follows: <i>"At Drummond Crescent a school led mixed use development will</i>	Correction	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
			<i>be supported that preserves the historic curve of Drummond Crescent and improved and safe pedestrian routes through the site which may require housing or other appropriate uses to fund it."</i>		
Mi86	111	4.7	Amend text under 'Transport and public realm' – 'Pedestrian and cycle improvements on Eversholt Street' as follows: <i>"Enhanced pedestrian crossings and cycle facilities on Eversholt Street, particularly through improving crossing points and careful design of junctions to better facilitate pedestrian and cycle movement."</i>	Correction	
Mi87	112	4.7	Add the following immediately underneath the heading 'Delivery Strategy': <i>"Detailed delivery information for the West Somers Town area is set out below. See also Appendix 1 of the plan (Delivery Plans - Summary Table) for a summary of key delivery information for each site/project set out in this section."</i>	To provide cross reference to the proposed Delivery table.	
Mi88	112	4.7	Amend text under "Viability, delivery partners and mechanisms for key sites/projects" as follows: Housing and development viability issues applicable and to this area are discussed in chapter 5. Specific delivery issues for projects are set out below:	To avoid repetition	
Mi89	115 & 116	5	Change the title to " <i>Delivery, planning benefits and monitoring</i> "	Correction	
Mi90	117	5.3	Amend the first paragraph under heading '5.3 Delivery plans' as follows: <i>"Key delivery issues are described for each site and projects within the sub areas in Part 4, including viability, delivery partners and mechanisms and phasing. A summary of all the delivery issues for each site is presented in the Delivery Plan Summary table at appendix 1 – please refer also to this.</i> <i>The Council and the GLA will use these delivery plans.. "</i>	To provide appropriate cross referencing to delivery tables.	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
Mi91	117	5.4	Amend the text immediately under the heading '5.4 Phasing' as follows: <i>"This Area Plan will run until 2031. For phasing purposes this has been split into the following three periods, which are referred to in the delivery strategies for each area in Part 4 and in the delivery plans summary table (Appendix 1):..."</i>	To provide appropriate cross referencing to delivery tables.	
Mi92	120	5.6	Amend second bullet point under the heading 'Community Infrastructure Levy' as follows: <i>"Camden CIL: The Council is currently developing detailed proposals for CIL charging and spending in Camden, and has produced a draft charging schedule. Following public consultation and a public examination, it is expected that the CIL will apply across Camden from <u>Spring 2015</u> autumn 2014. Currently the approach..."</i>	Update	
Mi93	123		Add text to clarify that this section contains appendices as follows: <i>"<u>Appendices</u> <u>1. Delivery plans – summary table</u> <u>2. List of development sites</u> <u>3. Objectives checklist</u> <u>4. Glossary"</u></i>	Update	
Mi94	125		Amend the text under 'List of development sites and relevant EAP sections' – 'Regent's Park Estate sites' as follows: <i>"Infill sites – identified through LB Camden Housing consultation A1 Robert Street car park A2 Rydal Water open space A3 Varndell Street A4 Newlands Open Space A5 Dick Collins TRA Hall A6 Albany Street Police Hall <u>A7 Staveley/ Newby overbuilds</u></i>	Update	

Modification reference	Page	Policy/ Section	Proposed Minor Modifications	Reason for change	Notes
			<p><u>A8 Camden People’s Theatre</u> <u>A9 Troutbeck overbuilds/ Cape of Good Hope</u> <u>A10 Space next to St Bede’s Hall</u> <u>A11 The Victory Pub..”</u></p>		
Mi95	131		<p>Delete reference to postal address on back cover: <i>“Find out more about this document by visiting eustonareaplan.info or by calling the EAP team on 020 7974 6805. If you are hard of hearing please contact us on our Textlink service on 020 7974 6866.</i> <i>Euston Area Plan</i> <i>6th floor, Town Hall Extension</i> <i>Argyle Street</i> <i>London WC1H 8EQ”</i></p>	Not necessary to provide postal address here.	

EAP Background Report & Historic Area Assessment: proposed changes

Modification reference	Page	Policy/ Section	Proposed Modifications	Reason for change	Notes
Mi96		Background Report Appendix 3: Introduction	<p>It is proposed to amend the introduction to reflect these comments with additional text highlighting policy requirements. Additional text has also been proposed in the introduction to highlight the historic sensitivity of the Euston area in order to provide a balanced context, as requested in subsequent discussions with English Heritage.</p> <p>In subsequent discussions English Heritage also requested that the introduction defines what is considered to be a tall building for the purposes of the assessment. A definition has therefore been provided at the start of the introduction.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p>	In response to representor 8 (English Heritage) comment 5	Agreed with English Heritage (EH)
Mi97		Background Report Appendix 3: figure 2	<p>Text proposed underneath Figure 2 to clarify that building heights shown are measured from an average ground level using a general storey height of three metres.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p>	Following subsequent discussions with English Heritage	Agreed with EH
Mi98		Background Report Appendix 3: Methodology	It is proposed to amend the methodology to briefly explain why a height of up to 60 metres is considered for assessment. Please see proposed changes to Appendix 3 Background Report.	In response to representor 8 (English Heritage) comment 6	Agreed with EH
Mi99		Background Report Appendix 3 Part B (methodology)	It is proposed to amend the methodology section part of B (local views) to highlight that the images and accompanying photographs provided are indicative only, and any planning applications proposing taller buildings would be required to provide Accurate Visual Representations (AVRs) to establish in detail the potential impacts: Please see proposed changes to Appendix 3 Background Report.	Following subsequent discussions with English Heritage	See also Statement of Common Ground with English Heritage
Mi100		Background Report Appendix 3 Part B	New text to be inserted to state that while the assessment refers to the role of existing foliage in screening views of taller buildings from some viewpoints, consideration should be given to seasonal change as impacts could change during the winter months	In response to comments from the City of Westminster	Westminster have indicated that they are satisfied with this response.

Modification reference	Page	Policy/ Section	Proposed Modifications	Reason for change	Notes
		(methodology)			
Mi101		Background Report Appendix 3: Introduction / Part B	Additional text has been proposed in the Introduction to Appendix 3, and the Methodology of part B highlighting that applicants would also be expected to undertake an assessment of the impact of tall buildings on the setting of affected heritage assets. Please see proposed changes to Appendix 3 Background Report.	Following subsequent discussions with English Heritage	Agreed with EH
Mi102		Background Report Appendix 3: Part A	It is proposed to add text at the beginning of Part A to briefly set out how the building heights in Figure 2 were established. A key will be added to better explain the viewing corridors shown in the extracted images from the LVMF. 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. Please see proposed changes to Appendix 3 Background Report.	In response to representor 8 (English Heritage) comment 7	Agreed with EH
Mi103		Background Report Appendix 3: Part B (introductory paragraph)	An additional sentence is proposed at the end of the introductory paragraph to Part B highlighting that local views can have wider importance as a result of significant buildings within the view.* Please see proposed changes to Appendix 3 Background Report. *and impacts on how a historic designed landscape is experienced.	Following subsequent discussions with English Heritage	Agreed: See statement of common ground with English Heritage and associated English Heritage comments.
Mi104		Background Report Appendix 3: Part B (methodology)	Additional text is proposed to be added to the methodology section at the start of Part B to explain 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.	In response to representor 8 (English Heritage) comment 10	Agreed with EH

Modification reference	Page	Policy/ Section	Proposed Modifications	Reason for change	Notes
			Please see proposed changes to Appendix 3 Background Report.		
Mi105		Background Report Appendix 3: Part B (Key findings)	<p>A number of amendments are proposed for the 'Key findings' section of Part B to identify areas where there may be potential for harm and avoiding judgement regarding likely impacts in advance of a planning application.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p>	In response to representor 8 (English Heritage) comment 9 and subsequent discussions	See Statement of Common Ground with English Heritage
Mi106		Background Report Appendix 3 (local views analysis)	<p>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 is proposed as suggested along with photographs of the heritage assets identified as impacted on in the views. Alongside this, following a request from English Heritage during subsequent discussions, the local view images have been refreshed from the versions provided in the proposed submission version of the Background Report.</p> <p>Additional text is also proposed 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> <p>Please see proposed changes to Appendix 3 Background Report.</p>	In response to representor 8 (English Heritage) comment 10 and subsequent discussions	See Statement of Common Ground with English Heritage
Historic Area Assessment, AMUP, June 2013					
Mi107	page 155	Historic Sensitivity Plan	Amend plan to show Regent's Park and Chester Terrace areas as areas of high historic sensitivity.	To ensure that although these areas are outside the plan boundary their historic sensitivity is recognised in the HAA	Requested at hearing by EH