

Somers Town Neighbourhood Forum's reponse to draft London Plan, 2 March 2018

Somers Town is the area north of Euston Road, between Euston and St Pancras Stations. Somers Town Neighbourhood Forum is the organisation preparing a Neighbourhood Plan for this area.

Chapter 1: Planning London's Future GG1 Building strong and inclusive communities

We strongly support the aim to build strong and inclusive communities, including the recognition that Neighbourhood Plans provide a particularly good opportunity for communities to shape growth in their areas (1.1.5).

We would like this to be reflected in the policy GGI, with new points:

- ensure full public participation and scrutiny of planning decisions, Local Plans, Opportunity Area Planning Frameworks, the London Plan etc, from the early stages through to implementation and monitoring
- identify resources and support to enable a wide range of interests to participate, taking into account the particular needs of different groups
- give automatic weight in planning decisions to an emerging Neighbourhood Plan.

and the following change:

- Point D – Promote the crucial role of town centres, **high streets and neighbourhoods**..

GG2 Making the best use of land

The priorities in policy GG2 don't appear to reflect the aspirations laid out in the supporting text. Greater recognition needs to be given to the impact on existing communities so that growth is sustainable.

We would like to see the first sentence of Policy GG2 changed to:

To achieve sustainable development that meets the needs of communities now and for future generations...

Introduce new points at the forefront:

- best use of land will be measured in terms of socio-economic and environmental value, not just financial viability.
- prioritise the protection of existing uses that meet the needs of local communities

Point A – Delete the word 'prioritise'. Development in Opportunity Areas etc must not displace existing resident and business communities, social infrastructure, networks and other assets that are valuable to people who live and work in these areas

Point C – this should include local economic audits and socio-economic impact assessments.

GG3: Creating a Healthy City

We strongly support the requirement that those involved in planning and development assess the potential impact of development proposals on communities' health and wellbeing. We would like to see a requirement that all applications for major developments include a Health Impact Assessments. In areas such as ours, where nitrogen dioxide levels are already illegal, we believe that all major developments should be required to undertake an Environmental Impact Assessment.

Access to healthy food is important. Access must include affordability as well as availability. Please reflect this in Point G – by supporting healthy and affordable food businesses on high streets, markets, town centres, as well as ensuring sufficient space for community-led food growing

GG4: Delivering the homes Londoners need

Many living in our community our living in overcrowded homes and will never be able to get on the property ladder. We would therefore like to see a target for social rented homes within this policy.

Chapter 2: Spatial Development Patterns

Somers Town is bordered by two Opportunity Areas: King's Cross to the east and Euston to the west. Development at Euston is causing particular concern at the moment.

Euston

2.1.66, 2.1.67, Fig. 2.11

The Euston Area Plan (EAP), produced by the GLA, working with TfL and Camden Council, was adopted in 2015. It is the plan for new homes, businesses, shops, community facilities, schools, new and improved public realm and open space.

The EAP recognises that to maximise the overall amount of new homes and jobs that can be delivered in a high-quality environment in the Plan area, there needs to be subsurface comprehensive station redevelopment, i.e. platforms and tracks from both HS2 and Network Rail stations need to be subsurface to allow for ground level development above the station.

The existing London Plan has an indicative employment capacity of 7,700 and supports a minimum 2,800 new homes.

The Euston Area Plan aims to deliver overall between 7,700 and 14,100 jobs and between 2,800 and approximately 3,800 additional homes.

The draft London Plan aims to deliver 16,500 jobs and and 2,800–3,800 new homes.

Given that Network Rail has now ruled out subsurface platforms and tracks in any redeveloped station at Euston, and that residential developments and new public open space on deck above railway tracks is looking unlikely, we believe the figures for new jobs and new homes in the draft London Plan are unachievable if recommended building heights and commitments on replacement and new green and open spaces are to be respected.

If the number one objective of the EAP is to be achieved – to prioritise local people’s needs – and if our part of London is to be enhanced, we believe the draft London Plan should aim to deliver not more than 7,700–14,100 new jobs and 2,800–3,800 new homes in the Euston OA. Mention should be given that the upper figures are dependent on development and open space above the station and above the tracks. New homes should not be sacrificed to create new job space.

Euston communities are suffering the worst environmental impacts from HS2. It is essential that the Euston Opportunity Area delivers a balanced mix of new homes (including a minimum 50 per cent social homes), green and open spaces, schools, community facilities, shops and businesses and in a form that is not alien to the existing townscape.

Para 2.1.66

Text on Euston Opportunity Area Draft text: ‘Scope exists to reconfigure Euston Square Gardens’. We propose that this text should be deleted, to ensure consistency with the Euston Area Plan (formally adopted) and to strengthen the need to have this protected London Square returned to full public use as a necessary green lung on the Euston Road.

Policy SD4 The Central Activities Zones (CAZ)

Part of our Plan area is within the CAZ and includes institutions such as the Francis Crick Institute and British Library. We welcome the acknowledgement of residential neighbourhoods within this policy and would like to see a better understanding of how residents and national institutions co-exist. For example, the nearest designated public open space for much of south Somers Town is the British Library forecourt. We welcome the demand for social infrastructure need assessments.

Para 2.4.8

Whilst we support measures to improve air quality in the CAZ, using cleaner construction vehicles and machinery in business than in residential areas seems to us to be counter-intuitive.

Policy SD10 Strategic and local regeneration

The use of the Index of Multiple Deprivation as the criterion for ‘strategic areas of regeneration’ (2.10.1) is not appropriate – specifically the use of the 20% most

deprived classification. The Plan should seek to improve housing according to needs in any/every area of London, not just in places bounded by the IMD. The IMD 20% most deprived status is not an adequate criterion for which area should be designated as appropriate for 'regeneration' and, with the exceptional impact of HS2 being felt in Somers Town for the next 20 years, as well as the likely construction of Crossrail 2, Euston Station rebuild, Maria Fidelis Consolidation Project, the British Library Extension and Central Somers Town CIP, it is not appropriate to further burden them with additional significant regeneration in the form of large-scale development.

Chapter 4: Design

Policy D6: Density

We welcome the inclusion of social infrastructure at D6B, but would like to see these factors quantified in firm criteria – we need to understand the impact on daylight, sunlight, children's play space, etc. of any new development.

Policy D7: Public Realm

We welcome the requirement for development plans to demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities. This should be through an up-to-date needs assessment that looks at different-sized parks, play space, community gardens, natural green space, etc.

Chapter 8

Green Infrastructure and the natural environment

We would like to see more clarity of Policy 4: Local green and open space. The policy asserts that all local green and open spaces should be protected and that boroughs should undertake a needs assessment of local green and open space to inform policy. We believe that that needs assessment should look at all types of local green and open space, both public and private. Some of our most treasured green spaces are private community gardens, for example.

Chapter 9

Sustainable infrastructure

We welcome the initiatives on air quality and would like to see a commitment to widespread monitoring of NO₂, PM₁₀s and PM_{2.5}s to ensure that developers' air quality assessments, based on desk-top studies, reflect what we are experiencing on the ground. We would like to see more air quality monitoring stations in residential areas.