

Response to the draft London Plan by the Camden HS2 Association of Residents' Groups for Engagement (CHARGE), 2 March 2018

CHARGE is the umbrella group uniting residents' groups across Camden affected by HS2.

Member organisations are:

Amphill Square TRA

Camden Civic Society

Camden Cutting Group

Cumberland Market RA

Darwin Court RA

Drummond Street TRA

Gloucester Avenue RA

Park Village East RA

Park Village RA

Silsoe House

Regents Park Estate TRA

SHOUT2 (South Hampstead Opposition to Underground Tunnelling – HS2)

Somers Town Neighbourhood Forum

CHARGE has looked specifically at the effect of the draft London Plan on those communities that are already struggling with the impacts of HS2 and are facing decades of construction blight.

Chapter 2 Spatial Development / opportunity areas

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 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 p. 53 Text on Euston Opportunity Area (no. 39)

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 SD7 C and Annex 1

Camden Town should not be designated as a future potential Metropolitan Town Centre. We note that the powers granted to the Mayor, and referenced in this policy, would allow the Mayor to act as planning authority in such areas, taking away planning powers from our local Council. Camden Town will be experiencing significant disruption from HS2 and related works over the lifetime of the new London Plan and doubling the potential retail, leisure and floor space in Camden Town, along with the identification of the

eastern side of it for regeneration (see comment on Policy SD10 below) will have a hugely detrimental affect on health and wellbeing of existing communities in the area. There needs to be stability in surrounding areas whilst the Euston Opportunity Area is being redeveloped, particularly when construction traffic will be utilising TLRN roads through Camden Town.

Policy SD10 Strategic Areas for 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 Camden Town, Regent's Park Estate, Ampthill Estate, Drummond Street area and Somers Town for the next 20 years it is not appropriate to further burden them with additional significant regeneration.