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Greater London Authority  
City Hall  
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To Whom It May Concern,

## **A City for all Londoners – Consultation response on behalf of HS2 Euston Ltd and Network Rail**

### **Introduction**

We write on behalf of our clients, HS2 Euston Ltd and Network Rail in response to the Mayor's vision for the future development of London, as set out in 'A City for All Londoners' (the document).

The comments below in response to the document are submitted in the context of future plans to comprehensively redevelop Euston station to deliver HS2 in to Euston and a revitalised classic station. This is in the context of Euston accommodating not only these stations and routes, but a station for Crossrail 2 and improvements to the London Underground station. The vision for the Euston area is to rejuvenate it as both a local hub of activity and a gateway to London through new high quality comprehensive and transformational commercial and residential development around a world class transport interchange at Euston Station.

The regeneration of the Euston area provides the opportunity to create a new mixed use piece of London for the next generations. It could contribute a substantial amount to the local and national economy through commercial development and much needed housing planned in a holistic high quality way. Working together with Network Rail, Camden Council and others, we believe Euston can deliver major social, environmental and economic gains for the area.

The programme for delivery of Euston HS2 station is 2026 and whilst this is some time away, there is significant activity ongoing in order to achieve this. One of the areas is the appointment of a development partner to deliver commercial development associated with the station in order to deliver significant generational change to the area.

### **The role of transport providers**

We are supportive of the general thrust of the document to accommodate London's growth needs in a holistic and sustainable manner. In particular, we consider the document highlights the crucial role transport providers will play in helping to ensure London's transport system is capable of supporting the city's predicted levels of growth. The document makes clear that investment in transport infrastructure is inextricably linked to unlocking new growth opportunities across London.

In this context, our clients welcome continued dialogue with the Mayor and other key stakeholders to help deliver an integrated transport strategy for Euston, as part of the emerging London Plan process.

## **Optimising development opportunities**

We welcome the Mayor's commitment to optimise development in Opportunity Areas/Intensification Areas and in locations around well-connected transport nodes.

The comprehensive redevelopment of Euston station will reaffirm its importance as a key gateway in to central London and help to ensure the city's transport infrastructure reflects its status as a world-leading cultural and economic centre. A rejuvenated Euston station will present a significant opportunity to intensify development in a sustainable and accessible location, and can act as a catalyst for regeneration of the wider area.

Accordingly, optimising the density of development above and around the station will enable the area to make an invaluable contribution towards meeting London's development needs in line with some of the Mayor's key overarching objectives:

- **Housing growth** - The delivery of new housing around Euston and other key transport nodes will ensure new homes are provided in easily accessible locations, and in turn encourage more sustainable modes of transport and reduce reliance on the private car.

To achieve higher housing densities in these locations, we encourage the Mayor to revisit housing density guidance as part of the London Plan process in order to deliver high-density development in accessible locations. Indeed, we welcome the approval of recent housing schemes that have been approved which exceed London Plan standards. We recognise this cannot be to the detriment of good design and placemaking. Our clients are working hard to ensure these pillars of attractive sustainable development are central to the stations design and commercial development and regeneration associated with Euston.

- **Economic growth** – We welcome the Mayor's desire in the document to create more mixed use-developments. Alongside new housing, the Euston area presents a fantastic opportunity to provide a significant level of employment space at a key gateway location into London. This will strengthen Euston's position as a central London sub-market office location to complement other sub-markets (see Deloitte Crane Winter Survey 2016) and ensure jobs are created in easily accessible locations.
- **Place-making** – The document outlines that there is need to consider growth pressures in the context of creating high quality, accessible places where people want to live, work, visit and can come together as communities. The holistic and integrated redevelopment of Euston will enable the opportunity to make more efficient use of public spaces around the station and deliver well-designed, attractive and functional spaces.
- **Development in accessible locations** – Ensuring London has an accessible transport system is a key theme running throughout the document. The success of new neighbourhoods and business districts, such as Euston, will rely heavily on easy access to the public transport network. The delivery of significant development opportunities around a rejuvenated Euston station will provide effective and sustainable growth that is highly accessible.

## **The need for flexibility**

As explained in the document, London is facing significant growth pressures and land is in high demand for other competing priorities. The Mayor needs to create a flexible policy environment to ensure that London's overriding growth needs are prioritised, and ultimately delivered. We consider that flexibility is required in the following areas:

- **London Viewing Management Framework (LVMF)** – the London viewing corridors need to be carefully considered in the context of London’s growth needs. It is considered that some of the viewing corridors are dated and could be altered to enable the delivery of higher density development. The Euston station site is crossed by three landmark viewing corridors. Vista 2B.1 and Vista 4A.1 cross a significant portion of the site, whilst Vista 2A.2 encroaches on the northern most end of the site. Euston station also lies in the background view of Vista 5A.2 and 6A.1. We would welcome the opportunity to discuss the viewing corridors in the context of the regeneration of Euston as part of the LVMF review.
- **Heritage** – there is limited detail in the document on the Mayor’s vision for how delivering significant new growth can be met whilst protecting and enhancing London’s heritage assets. We would welcome further detail on how the GLA and Historic England are working together to marry these potentially opposing themes through the positive promotion of development.
- **Viability considerations** – the document outlines that the Mayor will be setting out a new approach to viability. The development of large-scale regeneration projects, such as Euston, has significant costs associated with their delivery. Potential double counting for infrastructure through payment from the public purse and CIL can happen. We would encourage the Mayor to take a realistic flexible policy approach to ensure the viability of schemes, whether infrastructure or commercial linked to infrastructure, is not stifled by onerous policy requirements.
- **Green spaces** – the document outlines the Mayor’s desire to protect the Green Belt and other designated green spaces. We would welcome clarity from the Mayor on his aspirations in relation to green space and whether this could potentially be met through an approach that allows for the reconfiguration of open space.

## **Summary**

We are pleased that the Mayor continues to promote the Euston opportunity area and recognises that a redeveloped Euston is of strategic importance to London. HS2 and Network Rail’s visions align and we look forward to working with the Mayor and GLA to achieve it.

We would like to comment on the forthcoming detailed strategies which will inform the new London Plan and wish to be updated on any future formal consultation opportunities.

Yours sincerely,

Caroline McDade