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| 2022/1680/HS2 | Kathleen J Conn | 19/06/2022 21:14:56 | OBJ | As a member of the public and local resident, I was one of the 94 per cent who responded to an earlier consultation objecting to the building design which didn't respect the context and calling for the cladding to be replaced or screened via a green-walling system.<br><br>I find myself, again, having to take the time to object to the proposed brutalist building design which is out of place in its context, does nothing to compensate for the over 500 trees felled, lacks any sensitivity to the people who live alongside it and does not provide the legally required ecological connectivity.<br><br>At minimum, it needs to be screened by vegetation.. eg trees and extensive living walls over the sides of the building. |
| 2022/1680/HS2 | Ray Bryant | 18/06/2022 15:44:46 | COMMNT | This is an over-sized and banal building which makes no attempt to celebrate the massive infrastructure undertaking which it serves. At this stage there is probably very little that the planners can do to initiate a re-think, but they could ask for it to be clad in trellis or tensioned steel wires with ground zone capable of accepting Virginia creeper or other suitable climbing plant to provide masking cover to this enormous building mass. |
| 2022/1680/HS2 | Helen Simpson | 19/06/2022 20:58:23 | JUST | This is an insensitive plan, we need the plan to prioretise environmental sensitivities. HS2 has decimated our wild places in north London. Please do not go ahead. Enough destruction now, what do you think will make up for the loss you have perpetrated? Short sighted, sad plans. Enough. |
| 2022/1680/HS2 | Anna | 19/06/2022 23:59:44 | OBJ | The proposed design of the ventilation shaft building doesn¿t suit the local area.<br>It¿s oversized and industrial looking.<br>The structure should be reduced in size and redesigned in a Victorian style to much the local area.<br>The red brick wall should be rebuilt to its original style and height.<br><br>The chimneys in the proposed design look huge and scary! They should be reduced in size and screened by trees and evergreens.<br><br>The trees, shrubs, evergreens and brick wall were there to protect local people from the noise pollution and should have never been removed in the first place.<br><br>Local residents have been exposed now to a horrendous noise and dust pollution and not provided with any protection. This is unacceptable |

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| 2022/1680/HS2 | Jeffrey Travers | 19/06/2022 22:44:34 | OBJ | The Written Statement defines the scope of the schedule 17 submission as the following<br>1 Vent shaft head house building comprising three connecting elements<br>2 Road vehicle parking within the compound with a hardstanding area.<br>3 Earthworks within the compound area to facilitate the construction of the headhouse building and retaining walls to the east of the headhouse building.<br>4 Fencing (location only) encircling the permanent HS2 site to create a secure compound.<br>5 Artificial lighting equipment<br><br>And the government has limited the scope of determination to the grounds that "the design or external appearance of the building works ought to be modified to preserve the local environment or local amenity (the other ground relating to traffic seemingly not being relevant) and in order to preserve a site of archaeological or historic interest or nature conservation value",<br><br>The site is described in HS2's SES as a private nature reserve and it is designated SINC grade 1 so is therefore "a site of Nature Conservation Value" though it is not as described at very beginning of the application's Design and Access Statement "dense secondary woodland chiefly composed of sycamore, horse chestnut and holm oak. ivy, bramble is completely inaccurate" in that there were never any horse chestnut trees on the site though there were some sessile oaks and most of the 541 trees on the tree survey were ash trees (with most supporting luxuriant mature arboreal ivy). To get this so wrong shows astonishing disregard of the existing biodiversity of the sensitive nature reserve site.<br><br>1 Regarding the Vent Shaft headhouse building<br>This is manifest as two tall, above ground buildings..(vent stack and head house) linked by a large underground fan room below the street level carpark.<br><br>The vent shaft headhouse building is sited in Primrose Hill ward within a private nature reserve 5 metres away from a local nature reserve and in a very prominent position at the edge of the railway cutting between two conservation areas. So this is a very sensitive site .. and visually: particularly from the south, east and west across the cutting. The sensitivity from its main viewing impact (from the south) is not however included in the Written Statement as a design constraint. Para 4.2.2 only mentions "Residential areas to the north, west and east of the site". The constraint to the south is reduced to "the existing rail corridor to the south of the site". This is a significant ommission that ignores the major visual impact of the proposals on the lives of thousands of residents in Primrose Hill looking down on the site (who also have acoustic concerns regarding railway noise).<br><br>The proposed design of the headhouse cladding uses exactly the same visual concept as the 1960's Euston Station trainshed... dark grey brick plinth below a band of light grey cladding. I worked briefly on the design of Euston Station as a student.. and even the 20th Century Society regard the sad train shed as problematic... (though they say the concourse has some merit).<br>So the Adelaide Vent shaft as proposed will appear like a broken-off chunk of 1960's Euston Station placed by the side of the track in Primrose Hill... as if using the nature reserve as a dump... (notwithstanding that HS2 have recently abandonned their spoil-by-rail promise for Euston).<br><br>Like Euston Station, the headhouse will have the appearance of a 1960's industrial shed.. entirely out of keeping with the local context of woodland and stuccoed victorian villas. |

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The Appendices contain only the "Report" of the final meeting of the HS2 Independent Design Panel to review the design of the Vent shaft.
The minutes include Design Panel's summary of the aesthetic intentions driving the proposed design.

It was pointed out to HS2 at the June ECRG meeting that this design policy requires further explanation for the public to comment properly on the schedule 17 application proposals. And HS2 agreed to arrange that HS2's design manager will attend the next ECRG meeting in 3 months time to explain the policy.

In the meantime.. in the absence of explanations elsewhere.. HS2 said they would undertake an immediate review of the design with SCS and Camden.. and Laurence Whitbourne told me that it would be an opportunity for alternative designs from the Community to be considered. Such alternatives however require the internal planning of the vent shaft to be published (as it is currently withheld in the application).. so that the engineering functionality of the vent shaft headhouse design can be maintained. For example insufficient plans are included in the application documents and room labels are illegible. It is understood some more internal planning information was shared after the Schedule 17 submission with Camden.. in order to justify the building height along Adelaide Road... but Camden say that this is confidential.

Initially however, to comment further on the design of the external appearance of the headhouse building, it is necessary to try to interpret the Design Panel's justification of the application design in terms of HS2's design policy.

This justification initially applauded the design for embodying HS2's design policy of "Revealing the machine".. this slogan being an obvious and reasonable attempt on HS2's part to create a visual language for its linewide designs.

But clearly that language needs to be compatible with individual local contexts.
The government makes it clear to LAs that their remit is to ensure the local context is protected from inappropriate application of such linewide design and branding policy. Above all it should be understood that where there is tension and incompatibility ... 'shouting' in a foreign language is inappropriate and use of such a foreign language needs to be minimised.
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But "revealing the machine" could also refer to functionalist propaganda... ie via monuments stripped of ornament. But the danger of this is that it can disregard the importance of scale and other visual issues on the context of particular monuments.. as at Adelaide Road. I also note that the LUL vent shaft at Euston is an extreme example of this.

If however 'revealing the machine' refers to the functionalist design policy of HS2 (cf Le Duc and Sullivan).. ie truth to function.. the proposed headhouse design does not fulfill such a policy.
The machine of the head house is obviously the fan room. In reality the submitted design locates this underground beneath the proposed carpark and not within the headhouse. So the enormous headhouse box (which is clearly intended as the sculptural expression of the machine).. is a not an expression of the machine within.
Within the monumental box is hidden an escape staircase and a mix of secondary spaces and also big voids eg to make up two corners of the box (for pure effect concealing two ventilation grilles) of which the minutes included in the appendix of the Design and Access Statement say "the Design Panel appreciated the way (one of these) dematerialises to create trackside views inside" ie "revealing the machine" for visual effect.

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I should also add that the separate small vent stack building to the west of the carpark connected directly to the fans should be the main expression of the machine.. not the headhouse.

I note that the LUL vent shaft at Euston (the so-called "sugar cube") is an extreme example of falsely celebrating vent shafts. because its ventilation function is very small. It is in fact mostly a substation with a staff rest room on the top floor. The vent terminal to the small air duct is hidden on the roof.

The Desiign Panel also credit the design as having "the potential to meet the ambitions of HS2's Design Vision" aka "PPT" (which stands for People, Places, Time). The second item of Time requires the vent shaft to be an expression of HS2's branding and timeless design ("projectecting a positive and lasting legacy for HS2"). And so, in response to Camden's request for screening and green walling as mitigation.. the Design Panel tell the Design Team not to comply with Camden's request .. but instead they "encourage the design team to avoid further attempts to conceal the structures to avoid compromising the role the headhouse should play in celebrating an extraordinary infrastructure project potentially becoming a landmark in the local area."

Most of the respondents to the Contractor's engagement survey in Autumn 2021 (which the Design Panel Report minutes as a "public consultation" and note the possibility of consequent design changes) also called for the structures to be screened with green walling. And the first item of People in PPT is for SCS "to collaborate with the local community to understand their aspirations".But SCS's immediate response to this "consultation" was to say that they weren't going to change their design. And the Design and Access Statement post-rationalises this by saying that it isn't feasible as more green-walling would compromise the ventilation and security systems. But given that no further systematic attempt has been made to incorporate

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The cantilevered head house seems to be mostly a sham. (or at least the Design House architect told me it was).. as the roof plan shows the high level vent grilles (at each side of the circular brick clad shaft) are recessed so the timber cladding is merely a screen.. ie an aesthetic device.
But the aesthetics is that of Euston station train shed. The architect told me that she was told to simplify the geometry into the form of a cantilevered box in the belief that it would appear less noticeable. But the effect is the opposite. Greater complexity will reduce the apparent scale.
HS2's design policy suggests that simplifying the geometry into a box was done to comply with and promote HS2's line-wide branding.

Without the falsely cantilevered timber box being expressed on the south elevation, the circular brick shaft can be expressed full height and green walled. Ventilation grilles near green walling can project (eg "revealing the machine" as design features "to celebrate an extraordinary infrastructure project")

Green walling needs to be supported on tension cable screens fixed to the structures a short distance in front of the walls. The locations of these screens need to be included in the initial Schedule 17 application together with appropriate modification to the currently proposed external envelope, cladding system and materials.. or the vent shaft head house should be omitted from the application and redesigned for a separate application.

It also needs to be demonstrated that the internal spaces require a flat head house roof at the same level. Deep planters need to be included in the green roof.

2 Regarding Hardstanding Parking Area.
A narrow strip of this immediately behind the south parapet wall should become a raised planter for small trees and shrubs to screen the carpark from the view across the railway cutting.
The row of fastigiate trees along the street will be out of character with the area and the rest of the nature reserves' landscaping .. and unless they are evergreen will only screen the lower part building for part for part of the year even when fully grown. The previous woodland was full of dense ivy .. so each deciduous tree had a big evergreen ivy tree growing within it and ivy grew above the old wall.

3 Regarding Earthworks and retaining walls
The earthworks should enable the retention of as much existing embankment as possible so that the stumps of existing nature reserve trees can continue to regenerate. It should be noted that the description of Tree species present in the Design and Access Statement is inaccurate. For example the list of trees does not include oak or ash but wrongly includes horse chestnut. It should be noted that the predominant species is (and was) ash and both ash and oak regenerate quickly as coppice trees. It should be noted that the reason given for removing trees near the NR retaining wall was the instability of the retaining wall which markedly

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increases in height from west to east.. There is however little likelihood of instability at the low (west) end of the wall where most of the regeneratig tree stumps are located near by.
The earthworks should allow rainwater discharging from the Headhouse roof to be collected in a number of ponds and boggy areas to encourage a varied ecology and biodiversity.

The retaining walls in the restored embankment to the east of the head house should be shifted east slightly to enable the external steps to be similarly moved to create a planting strip for green walling at the base of the east elevation wall.
The retaining wall layout should be adjusted so that as many of the existing tree stumps as possible can continue to regenerate.

4 Regarding Fencing (location only)
The location of the fence shown on section subdivided the narrow strip of land to the south of the head house.. between head house and retaining wall. Without the fence this narrow strip does not fulfill the legal requirement of maintaining the ecological connectivity between the LNR and the HS2 compound. With the fence in the location shown the narrow space below the headhouse undercroft is a barrier to ecological connectivity.

It also needs to be understood that the view from the east (in the application documents) falsely suggests that trees are possible south of the headhouse. This is because the trees shown are existing background trees within the LNR... or conjectural proposed foreground trees to the east of the headhouse.. notwithstanding that the landscape scheme makes clear that there will be no such trees to the west of the headhouse close to the NR retaining wall (because previously it has been made clear that NR will not allow trees in the vicinity of its existing retaining wall).

I should note that the Design and Access Statement includes the original concept sketch for ecological connectivity and this clearly shows the head house screened by large trees to the south. There is however an arrow labelled "ecological connectivity" in mid air over a much lower building with large shrubs shown growing on its roof. This mid-air ecological connectivity must be regarded as illusory however.. and now that the proposed building is more than double height.. the legal requirement to "maintain" ecological connectivity between the LNR and the private nature reserve is clearly totally unfulfilled.

The fence located between the NR private Nature Reserve and the reinstated HS2 site also diminishes ecological connectivity.
The previous historic pig iron railings between the NR private reserve and the LNR permitted ecological connectivity. Any new fence should "maintain" the same spacing in order to "maintain" the legally required connectivity. There was also a large opening in the south west corner of the HS2 site which allowed wildlife to move freely between the two nature reserves and the adjacent overgrown disused railway line. It should be noted however that a continuous set of steps has been cut into the restored embankment tight to the boundary almost the entire length of the new fencing. These steps will completely obstruct ecological connectivity.
It should also be noted that HS2's published "no net loss in biodiversity" code requires negotiation over nature conservation maintenance of the Site (including presumably the area to be handed back to NR) with local bodies.. presumably in this case LBCamden and the Adelaide Nature Reserve Association. This was promoted by HS2 to Camden just prior to the Bill.. and HS2's slide presentation illustrated a wide green corridor for maintenance access without fences. HS2 even advocated a visitor centre on their site linked to the

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LNR as an "opportunity"..
The effect of the currently proposed lack of jointly agreed maintenance and access on the biodiversity loss score for this schedule 17 application needs to be calculated together with the biodiversity loss from the physical proposals. I understood that Camden had requested this but it has not been supplied

The close proximity of the proposed fence to the vent shaft to the North, South and West means it should be treated within the schedule 17 application process as part of the building design (as an architectural element). It is thought likely to dominate the building design visually so determination should not be limited to its location. These fences should be determined the same way that the wall to the street will be determined.

Regarding the wall to the street... it should be noted that following the contractor's engagement (in which all respondents wanted the previous wall restored and to its previous height to reduce train noise), SCS gave assurances that they would do this.. However the drawings show the height of the wall between piers to be much lower than promised. It should be noted that SCS previously argued that it should be lower so the building can be better seen from the street (presumably "revealing the machine" and "celebrating an extraordinary infrastructure project potentially to become a landmark in the local area"
To conclude, I can see no value to HS2 in owning and making secure
a) the strip of land between the vent shaft headhouse and the NR retaining wall (providing the access panel at the South East corner are resited around the corner on the East elevation and safe balustrading is installed at the retaining wall instead of the currently proposed security fence).
b) the strip of land between the Vent Stack and the LNR.. currently containing a long flight of steps up the embankment (given that the two high level access panels can be resited on the carpark elevation)
c) the restored embankment east of the external staircase at the foot of the east wall (with safe balustrading installed at the NR retaining wall).
The brick vent stack and headhouse wall (once its access panels are resited) surely are sufficient security barrier to a) and b) and there is clearly no need for lighting. If maintenance access is ever needed to strips a) and b) it would be achieved via the external staircase below the east wall c).
Releasing this land would go some way to delivering the legal requirement of a green corridor for ecological connectivity linking the nature reserves. It also seems pathetic to subdivide the NR and HS2 restored embankments with a security fence.. when both narrow steeply sloping pieces of embankment are undevelopable.

5 Regarding Lighting
There should be no external lighting visible except when the building is occupied/visited at night or in an emergency.

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The earthworks should enable the retention of as much existing embankment as possible so that the stumps of existing nature reserve trees can continue to regenerate. It should be noted that the description of Tree species present in the Design and Access Statement is inaccurate. For example the list of trees does not include oak or ash but wrongly includes horse chestnut. It should be noted that the predominant species is (and was) ash and both ash and oak regenerate quickly as coppice trees. It should be noted that the reason given for removing trees near the NR retaining wall was the instability of the retaining wall which markedly

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It also needs to be understood that the view from the east (in the application documents) falsely suggests that trees are possible south of the headhouse. This is because the trees shown are existing background trees within the LNR... or conjectural proposed foreground trees to the east of the headhouse.. notwithstanding that the landscape scheme makes clear that there will be no such trees to the west of the headhouse close to the NR retaining wall (because previously it has been made clear that NR will not allow trees in the vicinity of its existing retaining wall).

I should note that the Design and Access Statement includes the original concept sketch for ecological connectivity and this clearly shows the head house screened by large trees to the south. There is however an arrow labelled "ecological connectivity" in mid air over a much lower building with large shrubs shown growing on its roof. This mid-air ecological connectivity must be regarded as illusory however.. and now that the proposed building is more than double height.. the legal requirement to "maintain" ecological connectivity between the LNR and the private nature reserve is clearly totally unfulfilled.

The fence located between the NR private Nature Reserve and the reinstated HS2 site also diminishes ecological connectivity.
The previous historic pig iron railings between the NR private reserve and the LNR permitted ecological connectivity. Any new fence should "maintain" the same spacing in order to "maintain" the legally required connectivity. There was also a large opening in the south west corner of the HS2 site which allowed wildlife to move freely between the two nature reserves and the adjacent overgrown disused railway line. It should be noted however that a continuous set of steps has been cut into the restored embankment tight to the boundary almost the entire length of the new fencing. These steps will completely obstruct ecological connectivity.
It should also be noted that HS2's published "no net loss in biodiversity" code requires negotiation over nature conservation maintenance of the Site (including presumably the area to be handed back to NR) with local bodies.. presumably in this case LBCamden and the Adelaide Nature Reserve Association. This was promoted by HS2 to Camden just prior to the Bill.. and HS2's slide presentation illustrated a wide green corridor for maintenance access without fences. HS2 even advocated a visitor centre on their site linked to the

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The effect of the currently proposed lack of jointly agreed maintenance and access on the biodiversity loss score for this schedule 17 application needs to be calculated together with the biodiversity loss from the physical proposals. I understood that Camden had requested this but it has not been supplied

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Regarding the wall to the street... it should be noted that following the contractor's engagement (in which all respondents wanted the previous wall restored and to its previous height to reduce train noise), SCS gave assurances that they would do this.. However the drawings show the height of the wall between piers to be much lower than promised. It should be noted that SCS previously argued that it should be lower so the building can be better seen from the street (presumably "revealing the machine" and "celebrating an extraordinary infrastructure project potentially to become a landmark in the local area"
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The brick vent stack and headhouse wall (once its access panels are resited) surely are sufficient security barrier to a) and b) and there is clearly no need for lighting. If maintenance access is ever needed to strips a) and b) it would be achieved via the external staircase below the east wall c).
Releasing this land would go some way to delivering the legal requirement of a green corridor for ecological connectivity linking the nature reserves. It also seems pathetic to subdivide the NR and HS2 restored embankments with a security fence.. when both narrow steeply sloping pieces of embankment are undevelopable.

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There should be no external lighting visible except when the building is occupied/visited at night or in an emergency.

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| 2022/1680/HS2 | Jeffrey Travers | 19/06/2022 22:44:40 | OBJ | The Written Statement defines the scope of the schedule 17 submission as the following<br>1 Vent shaft head house building comprising three connecting elements<br>2 Road vehicle parking within the compound with a hardstanding area.<br>3 Earthworks within the compound area to facilitate the construction of the headhouse building and retaining walls to the east of the headhouse building.<br>4 Fencing (location only) encircling the permanent HS2 site to create a secure compound.<br>5 Artificial lighting equipment<br><br>And the government has limited the scope of determination to the grounds that "the design or external appearance of the building works ought to be modified to preserve the local environment or local amenity (the other ground relating to traffic seemingly not being relevant) and in order to preserve a site of archaeological or historic interest or nature conservation value",<br><br>The site is described in HS2's SES as a private nature reserve and it is designated SINC grade 1 so is therefore "a site of Nature Conservation Value" though it is not as described at very beginning of the application's Design and Access Statement "dense secondary woodland chiefly composed of sycamore, horse chestnut and holm oak. ivy, bramble is completely inaccurate" in that there were never any horse chestnut trees on the site though there were some sessile oaks and most of the 541 trees on the tree survey were ash trees (with most supporting luxuriant mature arboreal ivy). To get this so wrong shows astonishing disregard of the existing biodiversity of the sensitive nature reserve site.<br><br>1 Regarding the Vent Shaft headhouse building<br>This is manifest as two tall, above ground buildings..(vent stack and head house) linked by a large underground fan room below the street level carpark.<br><br>The vent shaft headhouse building is sited in Primrose Hill ward within a private nature reserve 5 metres away from a local nature reserve and in a very prominent position at the edge of the railway cutting between two conservation areas. So this is a very sensitive site .. and visually: particularly from the south, east and west across the cutting. The sensitivity from its main viewing impact (from the south) is not however included in the Written Statement as a design constraint. Para 4.2.2 only mentions "Residential areas to the north, west and east of the site". The constraint to the south is reduced to "the existing rail corridor to the south of the site". This is a significant ommission that ignores the major visual impact of the proposals on the lives of thousands of residents in Primrose Hill looking down on the site (who also have acoustic concerns regarding railway noise).<br><br>The proposed design of the headhouse cladding uses exactly the same visual concept as the 1960's Euston Station trainshed... dark grey brick plinth below a band of light grey cladding. I worked briefly on the design of Euston Station as a student.. and even the 20th Century Society regard the sad train shed as problematic... (though they say the concourse has some merit).<br>So the Adelaide Vent shaft as proposed will appear like a broken-off chunk of 1960's Euston Station placed by the side of the track in Primrose Hill... as if using the nature reserve as a dump... (notwithstanding that HS2 have recently abandonned their spoil-by-rail promise for Euston).<br><br>Like Euston Station, the headhouse will have the appearance of a 1960's industrial shed.. entirely out of keeping with the local context of woodland and stuccoed victorian villas. |

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But the Appendices of the application's Design and Access Statement reveal that these aesthetic problems are the consequence of HS2's design policy... (which the HS2 Design Panel say they satisfy).

The Appendices contain only the "Report" of the final meeting of the HS2 Independent Design Panel to review the design of the Vent shaft.
The minutes include Design Panel's summary of the aesthetic intentions driving the proposed design.

It was pointed out to HS2 at the June ECRG meeting that this design policy requires further explanation for the public to comment properly on the schedule 17 application proposals. And HS2 agreed to arrange that HS2's design manager will attend the next ECRG meeting in 3 months time to explain the policy.

In the meantime.. in the absence of explanations elsewhere.. HS2 said they would undertake an immediate review of the design with SCS and Camden.. and Laurence Whitbourne told me that it would be an opportunity for alternative designs from the Community to be considered. Such alternatives however require the internal planning of the vent shaft to be published (as it is currently withheld in the application).. so that the engineering functionality of the vent shaft headhouse design can be maintained. For example insufficient plans are included in the application documents and room labels are illegible. It is understood some more internal planning information was shared after the Schedule 17 submission with Camden.. in order to justify the building height along Adelaide Road... but Camden say that this is confidential.

Initially however, to comment further on the design of the external appearance of the headhouse building, it is necessary to try to interpret the Design Panel's justification of the application design in terms of HS2's design policy.

This justification initially applauded the design for embodying HS2's design policy of "Revealing the machine".. this slogan being an obvious and reasonable attempt on HS2's part to create a visual language for its linewide designs.

But clearly that language needs to be compatible with individual local contexts.
The government makes it clear to LAs that their remit is to ensure the local context is protected from inappropriate application of such linewide design and branding policy. Above all it should be understood that where there is tension and incompatibility ... 'shouting' in a foreign language is inappropriate and use of such a foreign language needs to be minimised.
And it is clearly inappropriate that the language should be based on the failed, outdated NR trainshed cladding concept.
A change of language may even be the appropriate solution following local consultation (eg the Grimshaw barn headhouse being appropriate for the Chilterns ANOB)

But what does "Revealing the machine" mean? It could mean using every opportunity to assert HS2's engineering in architecture terms.. ie maximising its visibility.
But the objective of putting the railway in tunnel is that the impact at the surface of the ground is minimised.
So using pieces of real estate related to the tunnel to "celebrate an extraordinary infrastructure project" as "sculpture" .. and necessarily maximize impact as monuments conflicts with the intention of putting the line in tunnel. The "machine" should surely be concealed as much as possible where the line is in tunnel.

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"Revealing the machine" implies that the machine should not be screened. And this is explicitly what the Design Panel have insisted on.. in the face of Camden's request to screen or camouflage it .. eg via green walling

But "revealing the machine" could also refer to functionalist propaganda... ie via monuments stripped of ornament. But the danger of this is that it can disregard the importance of scale and other visual issues on the context of particular monuments.. as at Adelaide Road. I also note that the LUL vent shaft at Euston is an extreme example of this.

If however 'revealing the machine' refers to the functionalist design policy of HS2 (cf Le Duc and Sullivan).. ie truth to function.. the proposed headhouse design does not fulfill such a policy.
The machine of the head house is obviously the fan room. In reality the submitted design locates this underground beneath the proposed carpark and not within the headhouse. So the enormous headhouse box (which is clearly intended as the sculptural expression of the machine).. is a not an expression of the machine within.
Within the monumental box is hidden an escape staircase and a mix of secondary spaces and also big voids eg to make up two corners of the box (for pure effect concealing two ventilation grilles) of which the minutes included in the appendix of the Design and Access Statement say "the Design Panel appreciated the way (one of these) dematerialises to create trackside views inside" ie "revealing the machine" for visual effect.

A more truthful expression of the machine would be to express and celebrate the ventilation grilles (as at Pompidou Centre etc) while minimising the visual impact of the rest of the building.
I should also add that the separate small vent stack building to the west of the carpark connected directly to the fans should be the main expression of the machine.. not the headhouse.

I note that the LUL vent shaft at Euston (the so-called "sugar cube") is an extreme example of falsely celebrating vent shafts. because its ventilation function is very small. It is in fact mostly a substation with a staff rest room on the top floor. The vent terminal to the small air duct is hidden on the roof.

The Desiign Panel also credit the design as having "the potential to meet the ambitions of HS2's Design Vision" aka "PPT" (which stands for People, Places, Time). The second item of Time requires the vent shaft to be an expression of HS2's branding and timeless design ("projectecting a positive and lasting legacy for HS2"). And so, in response to Camden's request for screening and green walling as mitigation.. the Design Panel tell the Design Team not to comply with Camden's request .. but instead they "encourage the design team to avoid further attempts to conceal the structures to avoid compromising the role the headhouse should play in celebrating an extraordinary infrastructure project potentially becoming a landmark in the local area."

Most of the respondents to the Contractor's engagement survey in Autumn 2021 (which the Design Panel Report minutes as a "public consultation" and note the possibility of consequent design changes) also called for the structures to be screened with green walling. And the first item of People in PPT is for SCS "to collaborate with the local community to understand their aspirations".But SCS's immediate response to this "consultation" was to say that they weren't going to change their design. And the Design and Access Statement post-rationalises this by saying that it isn't feasible as more green-walling would compromise the ventilation and security systems. But given that no further systematic attempt has been made to incorporate

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green walling (as a consequence of the advice of the Design Panel), this conclusion regarding feasibility can only be a high level opinion of general feasibility... that does not take into account the particular instances where green-walling is feasible. For instance most of the east elevation of the head house and the west elevation of the vent stack could be green walled without impacting functionality... the former by moving the external staircase a few feet from the building to create a planting strip for climbing plants.. and the latter could also possibly (but not necessarily) relocate the high level access panels on west elevation of the vent stack to the east elevation (ie facing the car park) which is not illustrated in the application. The east part of the north elevation of the head house can also be green walled.

The cantilevered head house seems to be mostly a sham. (or at least the Design House architect told me it was).. as the roof plan shows the high level vent grilles (at each side of the circular brick clad shaft) are recessed so the timber cladding is merely a screen.. ie an aesthetic device.
But the aesthetics is that of Euston station train shed. The architect told me that she was told to simplify the geometry into the form of a cantilevered box in the belief that it would appear less noticeable. But the effect is the opposite. Greater complexity will reduce the apparent scale.
HS2's design policy suggests that simplifying the geometry into a box was done to comply with and promote HS2's line-wide branding.

Without the falsely cantilevered timber box being expressed on the south elevation, the circular brick shaft can be expressed full height and green walled. Ventilation grilles near green walling can project (eg "revealing the machine" as design features "to celebrate an extraordinary infrastructure project")

Green walling needs to be supported on tension cable screens fixed to the structures a short distance in front of the walls. The locations of these screens need to be included in the initial Schedule 17 application together with appropriate modification to the currently proposed external envelope, cladding system and materials.. or the vent shaft head house should be omitted from the application and redesigned for a separate application.

It also needs to be demonstrated that the internal spaces require a flat head house roof at the same level. Deep planters need to be included in the green roof.

2 Regarding Hardstanding Parking Area.
A narrow strip of this immediately behind the south parapet wall should become a raised planter for small trees and shrubs to screen the carpark from the view across the railway cutting.
The row of fastigiate trees along the street will be out of character with the area and the rest of the nature reserves' landscaping .. and unless they are evergreen will only screen the lower part building for part for part of the year even when fully grown. The previous woodland was full of dense ivy .. so each deciduous tree had a big evergreen ivy tree growing within it and ivy grew above the old wall.

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| 2022/1680/HS2 | Sophie Petrou | 16/06/2022 17:32:49 | OBJ | The current state of Adelaide Road saddens me. I live on Adelaide Road and the noise and traffic has become unbearable. We were promised secondary glazing 2 years ago. We were all set to have a company called Exteriorplas instal secondary glazing a month ago. At the last moment HS2 decided to go with a different contractor. This is incredibly disappointing as we have already taken time off work for the survey, spent time communicating with Exteriorplas etc. The whole process needs to start again.<br><br>We have already experienced a lot of disruption due to HS2 (pollution, noise, rubbish not being collected, temporarily traffic lights right outside¿)<br><br>The noise is getting worse day by day and it¿s getting to the point where we are unable to sleep, this is of course having an impact on our physical and mental health. The noise is mostly being cause by the temporary traffic lights. This means we have excessive beeping from cars and people playing loud music from their cars at the traffic lights. People also have fights and shout at each other because of frustration caused about long wait times and the congested road.<br><br>I'm afraid our concerns have not been dealt with or even responded to in some instances. We have made formal complaints about the noise, the lack of response and clarification, the extensive wait times for secondary glazing and finally the temporary traffic lights which have been on Adelaide Road for so much longer than in the original plan. Of course the complaint was looked into but shut down immediately. This really has caused us the most upset and severe disruption to our day to day live.<br><br>I completely agree with others that it is very poorly designed and doesn't fit in with the environment. The 500 trees that have been cut down were far better... |

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| 2022/1680/HS2 | Colin Ludlow | 16/06/2022 11:56:34 | OBJ | I live in Eton College Road, close to the planned HS2 headhouse building and am dismayed by the proposed design for this structure. It is unattractive and needlessly intrusive, and also contradicts the aspirations of the community (which HS2 says is key to the Design Vision) as expressed in the contractor's consultation last autumn as reported in the application documents. The community almost unanimously rejected the design as damaging the local context. They wanted the visual impact minimised and all sides of the building screened with trees and green-walling systems.<br><br>Throughout it troubled history, consultation by HS2 has been a token exercise. Innumerable people have commented on their proposals, constructively and in good faith, in attempts to mitigate the negative impact of the scheme. HS2 has repeatedly gone through the motions of seeking opinion only then to ignore everything that has been said. Since this is purely an issue of design and ecology, which does not affect the construction of the railway itself, I would urge Camden Council to support its residents and insist for once that consultation is a meaningful process with practical results.<br><br>Quite apart from its brutalist concrete structure which is wholly out of keeping with the surrounding neighbourhood, the application design does not maintain the previous ecological connectivity via the legally required green corridor. Mitigation that could be provided by green walling has been rejected in favour HS2's branding by expressing the structure without screening. Such green walling would also contribute to the mitigation of the loss of biodiversity following the contractor's removal of 500 trees and related woodland habitat at the site.<br><br>I therefore urge the Council to reject this application pending redesign of the external structure and much greater screening through tree planting of the entire site. |

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| 2022/1680/HS2 | Dorothea Hackman | 19/06/2022 23:49:49 | OBJNOT | Camden Civic Society (CCS) objects to and complains of the Proposals from HS2 for Adelaide Road.<br>CCS agrees with and endorses the comments of the Primrose Hill Conservation Area Advisory Committee and of the Adelaide Road Residents/Nature Reserve/Garden organisations.<br>The Headhouse proposed by HS2 is so large as to interrupt and destroy the green corridor they are obliged to reinstate . It resembles an industrial block not in the least in keeping with the fine red brick wall they must restore , and not remotely in keeping with the splendid listed portals.<br><br>PHCAAC comments endorsed by CCS<br><br>1. The PHCAAC noted that the headhouse is acknowledged to impact the Primrose Hill CA (application Written statement p. 21 para 3.5.5) but also has an important impact on the Primrose Hill Tunnels (Eastern Portals), Listed Grade II*, the 1837 Portal specifically designed to integrate the railway with the local environment. The loss of green landscape, trees and shrubs, has harmed the setting of this Listed structure and its historic significance.<br><br>2. The PHCAAC also noted the applicant's objective 'to enhance the green corridor and for the buildings to be considered as sculptural elements within its landscape' (Design and access statement p. 24 para 5.4). But the Committee concluded that this objective had not been achieved in the present proposals.<br><br>3. It is false to claim, as the applicant does, that the landscape design 'provides visual screening' (Design and access statement p. 24 para 5.4). The building is too close to the rail-side boundary to the south – there is no 'landscape' left. We advise that this would be significantly harmful to the setting of the Listed Tunnel Portals and to the Conservation Areas. The design should be modified to allow dense green planting between the building and the rail-side boundary to screen the full height of the headhouse.<br><br>4. The building is proposed to be clad with timber cladding to 'help blend the building into it's newly landscaped setting', but timber cladding is not characteristic of the area: it will not blend in. We are also aware that timber cladding is subject to staining and other deterioration: what starts as 'mitigation' will, in time, become even more harmful to the character and appearance of the area. High-quality brickwork for the modified building would be more appropriate to the area.<br><br>5. Tree planting to Adelaide Road should be of mature trees, to the same height as the building, with dense underplanting to ensure an effective green screen to the site. We note that the green roof does not achieve screening of the building.<br><br>6. Lighting: the provision of permanent lighting throughout the night of the compound entrance and key access points to the vent shaft headhouse (Written Statement p. 17 para 3.2.26) would be deeply harmful to the surrounding environment and to ecology. The design of the lighting should be modified to provide lighting only when essential. |

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| 2022/1680/HS2 | Richard Simpson for Primrose Hill CAAC | 19/06/2022 10:55:28 | OBJ | PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE<br>12A Manley Street London NW1 8LT<br><br>15 June 2022<br><br>Adelaide Road HS2 headhouse 2022/1680/HS2<br><br>1. The PHCAAC noted that the headhouse is acknowledged to impact the Primrose Hill CA (application Written statement p. 21 para 3.5.5) but also has an important impact on the Primrose Hill Tunnels (Eastern Portals), Listed Grade II*, the 1837 Portal specifically designed to integrate the railway with the local environment. The loss of green landscape, trees and shrubs, has harmed the setting of this Listed structure and its historic significance.<br><br>2. The PHCAAC also noted the applicant's objective 'to enhance the green corridor and for the buildings to be considered as sculptural elements within its landscape' (Design and access statement p. 24 para 5.4). But the Committee concluded that this objective had not been achieved in the present proposals.<br><br>3. It is false to claim, as the applicant does, that the landscape design 'provides visual screening' (Design and access statement p. 24 para 5.4). The building is too close to the rail-side boundary to the south – there is no 'landscape' left. We advise that this would be significantly harmful to the setting of the Listed Tunnel Portals and to the Conservation Areas. The design should be modified to allow dense green planting between the building and the rail-side boundary to screen the full height of the headhouse.<br><br>4. The building is proposed to be clad with timber cladding to 'help blend the building into it's newly landscaped setting', but timber cladding is not characteristic of the area: it will not blend in. We are also aware that timber cladding is subject to staining and other deterioration: what starts as 'mitigation' will, in time, become even more harmful to the character and appearance of the area. High-quality brickwork for the modified building would be more appropriate to the area.<br><br>5. Tree planting to Adelaide Road should be of mature trees, to the same height as the building, with dense underplanting to ensure an effective green screen to the site. We note that the green roof does not achieve screening of the building.<br><br>6. Lighting: the provision of permanent lighting throughout the night of the compound entrance and key access points to the vent shaft headhouse (Written Statement p. 17 para 3.2.26) would be deeply harmful to the surrounding environment and to ecology. The design of the lighting should be modified to provide lighting only when essential.<br><br>Richard Simpson FSA<br>Chair |

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| 2022/1680/HS2 | Helen Doyle | 19/06/2022 23:29:25 | COMMNT | This proposed dissatisfactory neo-brutalist building design damages the local context and does NOT provide the legally required ecological connectivity.<br><br>In addition, it needs to be screened by vegetation, for example; by trees and Green Walling over the sides of the building. I have seen many examples of the benefits of Green walling on different projects and how it much better suits local surroundings, especially with the loss of hundreds of trees and related Woodland Habitat. |
| 2022/1680/HS2 | Jeffrey Travers | 19/06/2022 20:24:16 | OBJ | Regarding view 53...<br>The gargantuan scale and design of the proposed headhouse is completely at odds with the domestic scale and design other stuccoed victorian villas that can now be seen prominently on view 53 following HS2's removal of over 500 trees (based on the SCS tree survey) behind the vent stack, carpark and head house.<br>This the insertion of giant unscreened scaleless industrial style headhouse against a background of the carefully proportioned fenestration of victorian villlas creates the most unfortunate juxtaposition reminiscent of 1960s neo-brutalism.<br>The Design and Access Statement claims that the proposal is intended to be sculpture within a green corridor. But the vent shaft and head house replaces the green corridor and the proposal has no merit as sculpture.<br>The visual conflict with the context shows that this is the wrong place for expressing the heaf house as a monument. The visual juxtaposition would be a disaster for the local area for years to come.<br>The solution I advocate is to screen the vent shaft buildings with trees and green walling on tension cablles (plants rooted in the ground that require little or no maintenance) and play down the current crude simplistic scaleless geometry by breaking it up into much smaller elements that can be integrated with such green walling. But such measures require major modification to the cladding proposals and the external wall design.<br><br>And regarding view 53, I also doubt that the green roof shown is credible.. ie that the depth of soil shown on the application section can support the vegetation shown on view 53 ... particularly given the infrequent maintenance and watering that is likely to occur in perpetuity and even after the building' handover.. (using HS2's normal infrequent statutory landscape maintenance commitments). So the mitigation and ecological connectivity is illusory. |
| 2022/1680/HS2 | Jane shorter | 19/06/2022 16:43:56 | OBJ | The proposed head house structure is far too dominant for the site -DOES IT HAVE TO BE SO HUGE AND CLUMSILY RECTANGULR? Totally out of keeping with the houses opposite both on Adelaide Road and King Henry's Road. I am surprised that it is 16 metres high and if that unalleviated profile of the head house is the best they can do then it should be completely screened with green plants . My opinion is that it's size could be greatly reduced with a bit of intelligent design. |

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| 2022/1680/HS2 | Jeffrey Travers | 19/06/2022 11:23:36 | AMEND | The Written Statement defines the scope of the schedule 17 submission as the following<br>1 Vent shaft head house building comprising three connecting elements<br>2 Road vehicle parking within the compound with a hardstanding area.<br>3 Earthworks within the compound area to facilitate the construction of the headhouse building and retaining walls to the east of the headhouse building.<br>4 Fencing (location only) encircling the permanent HS2 site to create a secure compound.<br>5 Artificial lighting equipment<br><br>And the government has limited the scope of determination to the grounds that "the design or external appearance of the building works ought to be modified to preserve the local environment or local amenity (the other ground relating to traffic seemingly not being relevant) and in order to preserve a site of archaeological or historic interest or nature conservation value",<br><br>The site is described in HS2's SES as a private nature reserve and it is designated SINC grade 1 so is therefore "a site of Nature Conservation Value" though it is not as described at very beginning of the application's Design and Access Statement "dense secondary woodland chiefly composed of sycamore, horse chestnut and holm oak. ivy, bramble is completely inaccurate" in that there were never any horse chestnut trees on the site though there were some sessile oaks and most of the 541 trees on the tree survey were ash trees (with most supporting luxuriant mature arboreal ivy). To get this so wrong shows astonishing disregard of the existing biodiversity of the sensitive nature reserve site.<br><br>1 Regarding the Vent Shaft headhouse building<br>This is manifest as two tall, above ground buildings..(vent stack and head house) linked by a large underground fan room below the street level carpark.<br><br>The vent shaft headhouse building is sited in Primrose Hill ward within a private nature reserve 5 metres away from a local nature reserve and in a very prominent position at the edge of the railway cutting between two conservation areas. So this is a very sensitive site .. and visually: particularly from the south, east and west across the cutting. The sensitivity from its main viewing impact (from the south) is not however included in the Written Statement as a design constraint. Para 4.2.2 only mentions "Residential areas to the north, west and east of the site". The constraint to the south is reduced to "the existing rail corridor to the south of the site". This is a significant ommission that ignores the major visual impact of the proposals on the lives of thousands of residents in Primrose Hill looking down on the site (who also have acoustic concerns regarding railway noise).<br><br>The proposed design of the headhouse cladding uses exactly the same visual concept as the 1960's Euston Station trainshed... dark grey brick plinth below a band of light grey cladding. I worked briefly on the design of Euston Station as a student.. and even the 20th Century Society regard the sad train shed as problematic... (though they say the concourse has some merit).<br>So the Adelaide Vent shaft as proposed will appear like a broken-off chunk of 1960's Euston Station placed by the side of the track in Primrose Hill... as if using the nature reserve as a dump... (notwithstanding that HS2 have recently abandonned their spoil-by-rail promise for Euston).<br><br>Like Euston Station, the headhouse will have the appearance of a 1960's industrial shed.. entirely out of keeping with the local context of woodland and stuccoed victorian villas. |

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But the Appendices of the application's Design and Access Statement reveal that these aesthetic problems are the consequence of HS2's design policy... (which the HS2 Design Panel say they satisfy).

The Appendices contain only the "Report" of the final meeting of the HS2 Independent Design Panel to review the design of the Vent shaft.
The minutes include Design Panel's summary of the aesthetic intentions driving the proposed design.

It was pointed out to HS2 at the June ECRG meeting that this design policy requires further explanation for the public to comment properly on the schedule 17 application proposals. And HS2 agreed to arrange that HS2's design manager will attend the next ECRG meeting in 3 months time to explain the policy.

In the meantime.. in the absence of explanations elsewhere.. HS2 said they would undertake an immediate review of the design with SCS and Camden.. and Laurence Whitbourne told me that it would be an opportunity for alternative designs from the Community to be considered. Such alternatives however require the internal planning of the vent shaft to be published (as it is currently withheld in the application).. so that the engineering functionality of the vent shaft headhouse design can be maintained. For example insufficient plans are included in the application documents and room labels are illegible. It is understood some more internal planning information was shared after the Schedule 17 submission with Camden.. in order to justify the building height along Adelaide Road... but Camden say that this is confidential.

Initially however, to comment further on the design of the external appearance of the headhouse building, it is necessary to try to interpret the Design Panel's justification of the application design in terms of HS2's design policy.

This justification initially applauded the design for embodying HS2's design policy of "Revealing the machine".. this slogan being an obvious and reasonable attempt on HS2's part to create a visual language for its linewide designs.

But clearly that language needs to be compatible with individual local contexts.
The government makes it clear to LAs that their remit is to ensure the local context is protected from inappropriate application of such linewide design and branding policy. Above all it should be understood that where there is tension and incompatibility ... 'shouting' in a foreign language is inappropriate and use of such a foreign language needs to be minimised.
And it is clearly inappropriate that the language should be based on the failed, outdated NR trainshed cladding concept.
A change of language may even be the appropriate solution following local consultation (eg the Grimshaw barn headhouse being appropriate for the Chilterns ANOB)

But what does "Revealing the machine" mean? It could mean using every opportunity to assert HS2's engineering in architecture terms.. ie maximising its visibility.
But the objective of putting the railway in tunnel is that the impact at the surface of the ground is minimised.
So using pieces of real estate related to the tunnel to "celebrate an extraordinary infrastructure project" as "sculpture" .. and necessarily maximize impact as monuments conflicts with the intention of putting the line in tunnel. The "machine" should surely be concealed as much as possible where the line is in tunnel.

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"Revealing the machine" implies that the machine should not be screened. And this is explicitly what the Design Panel have insisted on.. in the face of Camden's request to screen or camouflage it .. eg via green walling

But "revealing the machine" could also refer to functionalist propaganda... ie via monuments stripped of ornament. But the danger of this is that it can disregard the importance of scale and other visual issues on the context of particular monuments.. as at Adelaide Road. I also note that the LUL vent shaft at Euston is an extreme example of this.

If however 'revealing the machine' refers to the functionalist design policy of HS2 (cf Le Duc and Sullivan).. ie truth to function.. the proposed headhouse design does not fulfill such a policy.
The machine of the head house is obviously the fan room. In reality the submitted design locates this underground beneath the proposed carpark and not within the headhouse. So the enormous headhouse box (which is clearly intended as the sculptural expression of the machine).. is a not an expression of the machine within.
Within the monumental box is hidden an escape staircase and a mix of secondary spaces and also big voids eg to make up two corners of the box (for pure effect concealing two ventilation grilles) of which the minutes included in the appendix of the Design and Access Statement say "the Design Panel appreciated the way (one of these) dematerialises to create trackside views inside" ie "revealing the machine" for visual effect.

A more truthful expression of the machine would be to express and celebrate the ventilation grilles (as at Pompidou Centre etc) while minimising the visual impact of the rest of the building.
I should also add that the separate small vent stack building to the west of the carpark connected directly to the fans should be the main expression of the machine.. not the headhouse.

I note that the LUL vent shaft at Euston (the so-called "sugar cube") is an extreme example of falsely celebrating vent shafts. because its ventilation function is very small. It is in fact mostly a substation with a staff rest room on the top floor. The vent terminal to the small air duct is hidden on the roof.

The Desiign Panel also credit the design as having "the potential to meet the ambitions of HS2's Design Vision" aka "PPT" (which stands for People, Places, Time). The second item of Time requires the vent shaft to be an expression of HS2's branding and timeless design ("projectecting a positive and lasting legacy for HS2"). And so, in response to Camden's request for screening and green walling as mitigation.. the Design Panel tell the Design Team not to comply with Camden's request .. but instead they "encourage the design team to avoid further attempts to conceal the structures to avoid compromising the role the headhouse should play in celebrating an extraordinary infrastructure project potentially becoming a landmark in the local area."

Most of the respondents to the Contractor's engagement survey in Autumn 2021 (which the Design Panel Report minutes as a "public consultation" and note the possibility of consequent design changes) also called for the structures to be screened with green walling. And the first item of People in PPT is for SCS "to collaborate with the local community to understand their aspirations".But SCS's immediate response to this "consultation" was to say that they weren't going to change their design. And the Design and Access Statement post-rationalises this by saying that it isn't feasible as more green-walling would compromise the ventilation and security systems. But given that no further systematic attempt has been made to incorporate

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green walling (as a consequence of the advice of the Design Panel), this conclusion regarding feasibility can only be a high level opinion of general feasibility... that does not take into account the particular instances where green-walling is feasible. For instance most of the east elevation of the head house and the west elevation of the vent stack could be green walled without impacting functionality... the former by moving the external staircase a few feet from the building to create a planting strip for climbing plants.. and the latter could also possibly (but not necessarily) relocate the high level access panels on west elevation of the vent stack to the east elevation (ie facing the car park) which is not illustrated in the application. The east part of the north elevation of the head house can also be green walled.

The cantilevered head house seems to be mostly a sham. (or at least the Design House architect told me it was).. as the roof plan shows the high level vent grilles (at each side of the circular brick clad shaft) are recessed so the timber cladding is merely a screen.. ie an aesthetic device.
But the aesthetics is that of Euston station train shed. The architect told me that she was told to simplify the geometry into the form of a cantilevered box in the belief that it would appear less noticeable. But the effect is the opposite. Greater complexity will reduce the apparent scale.
HS2's design policy suggests that simplifying the geometry into a box was done to comply with and promote HS2's line-wide branding.

Without the falsely cantilevered timber box being expressed on the south elevation, the circular brick shaft can be expressed full height and green walled. Ventilation grilles near green walling can project (eg "revealing the machine" as design features "to celebrate an extraordinary infrastructure project")

Green walling needs to be supported on tension cable screens fixed to the structures a short distance in front of the walls. The locations of these screens need to be included in the initial Schedule 17 application together with appropriate modification to the currently proposed external envelope, cladding system and materials.. or the vent shaft head house should be omitted from the application and redesigned for a separate application.

It also needs to be demonstrated that the internal spaces require a flat head house roof at the same level. Deep planters need to be included in the green roof.

2 Regarding Hardstanding Parking Area.
A narrow strip of this immediately behind the south parapet wall should become a raised planter for small trees and shrubs to screen the carpark from the view across the railway cutting.
The row of fastigiate trees along the street will be out of character with the area and the rest of the nature reserves' landscaping .. and unless they are evergreen will only screen the lower part building for part for part of the year even when fully grown. The previous woodland was full of dense ivy .. so each deciduous tree had a big evergreen ivy tree growing within it and ivy grew above the old wall.

3 Regarding Earthworks and retaining walls
The earthworks should enable the retention of as much existing embankment as possible so that the stumps of existing nature reserve trees can continue to regenerate. It should be noted that the description of Tree species present in the Design and Access Statement is inaccurate. For example the list of trees does not include oak or ash but wrongly includes horse chestnut. It should be noted that the predominant species is (and was) ash and both ash and oak regenerate quickly as coppice trees. It should be noted that the reason given for removing trees near the NR retaining wall was the instability of the retaining wall which markedly

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increases in height from west to east.. There is however little likelihood of instability at the low (west) end of the wall where most of the regeneratig tree stumps are located near by.
The earthworks should allow rainwater discharging from the Headhouse roof to be collected in a number of ponds and boggy areas to encourage a varied ecology and biodiversity.

The retaining walls in the restored embankment to the east of the head house should be shifted east slightly to enable the external steps to be similarly moved to create a planting strip for green walling at the base of the east elevation wall.
The retaining wall layout should be adjusted so that as many of the existing tree stumps as possible can continue to regenerate.

4 Regarding Fencing (location only)
The location of the fence shown on section subdivided the narrow strip of land to the south of the head house.. between head house and retaining wall. Without the fence this narrow strip does not fulfill the legal requirement of maintaining the ecological connectivity between the LNR and the HS2 compound. With the fence in the location shown the narrow space below the headhouse undercroft is a barrier to ecological connectivity.

It also needs to be understood that the view from the east (in the application documents) falsely suggests that trees are possible south of the headhouse. This is because the trees shown are existing background trees within the LNR... or conjectural proposed foreground trees to the east of the headhouse.. notwithstanding that the landscape scheme makes clear that there will be no such trees to the west of the headhouse close to the NR retaining wall (because previously it has been made clear that NR will not allow trees in the vicinity of its existing retaining wall).

I should note that the Design and Access Statement includes the original concept sketch for ecological connectivity and this clearly shows the head house screened by large trees to the south. There is however an arrow labelled "ecological connectivity" in mid air over a much lower building with large shrubs shown growing on its roof. This mid-air ecological connectivity must be regarded as illusory however.. and now that the proposed building is more than double height.. the legal requirement to "maintain" ecological connectivity between the LNR and the private nature reserve is clearly totally unfulfilled.

The fence located between the NR private Nature Reserve and the reinstated HS2 site also diminishes ecological connectivity.
The previous historic pig iron railings between the NR private reserve and the LNR permitted ecological connectivity. Any new fence should "maintain" the same spacing in order to "maintain" the legally required connectivity. There was also a large opening in the south west corner of the HS2 site which allowed wildlife to move freely between the two nature reserves and the adjacent overgrown disused railway line. It should be noted however that a continuous set of steps has been cut into the restored embankment tight to the boundary almost the entire length of the new fencing. These steps will completely obstruct ecological connectivity.
It should also be noted that HS2's published "no net loss in biodiversity" code requires negotiation over nature conservation maintenance of the Site (including presumably the area to be handed back to NR) with local bodies.. presumably in this case LBCamden and the Adelaide Nature Reserve Association. This was promoted by HS2 to Camden just prior to the Bill.. and HS2's slide presentation illustrated a wide green corridor for maintenance access without fences. HS2 even advocated a visitor centre on their site linked to the

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LNR as an "opportunity"..
The effect of the currently proposed lack of jointly agreed maintenance and access on the biodiversity loss score for this schedule 17 application needs to be calculated together with the biodiversity loss from the physical proposals. I understood that Camden had requested this but it has not been supplied

The close proximity of the proposed fence to the vent shaft to the North, South and West means it should be treated within the schedule 17 application process as part of the building design (as an architectural element). It is thought likely to dominate the building design visually so determination should not be limited to its location. These fences should be determined the same way that the wall to the street will be determined.

Regarding the wall to the street... it should be noted that following the contractor's engagement (in which all respondents wanted the previous wall restored and to its previous height to reduce train noise), SCS gave assurances that they would do this.. However the drawings show the height of the wall between piers to be much lower than promised. It should be noted that SCS previously argued that it should be lower so the building can be better seen from the street (presumably "revealing the machine" and "celebrating an extraordinary infrastructure project potentially to become a landmark in the local area"
To conclude, I can see no value to HS2 in owning and making secure
a) the strip of land between the vent shaft headhouse and the NR retaining wall (providing the access panel at the South East corner are resited around the corner on the East elevation and safe balustrading is installed at the retaining wall instead of the currently proposed security fence).
b) the strip of land between the Vent Stack and the LNR.. currently containing a long flight of steps up the embankment (given that the two high level access panels can be resited on the carpark elevation)
c) the restored embankment east of the external staircase at the foot of the east wall (with safe balustrading installed at the NR retaining wall).
The brick vent stack and headhouse wall (once its access panels are resited) surely are sufficient security barrier to a) and b) and there is clearly no need for lighting. If maintenance access is ever needed to strips a) and b) it would be achieved via the external staircase below the east wall c).
Releasing this land would go some way to delivering the legal requirement of a green corridor for ecological connectivity linking the nature reserves. It also seems pathetic to subdivide the NR and HS2 restored embankments with a security fence.. when both narrow steeply sloping pieces of embankment are undevelopable.

5 Regarding Lighting
There should be no external lighting visible except when the building is occupied/visited at night or in an emergency.