

**Application No 2022/3352/HS2** (Proposed Euston Cavern Headhouse Park Village East NW1 7PX)

Objections [REDACTED], 8 Park Village East, London NW1 7PX.

I live at 8 Park Village East, immediately opposite the site of the proposed headhouse which is the subject of this planning application. [REDACTED]

[REDACTED] I represented myself and my late wife, and also represented the Park Village East Residents' Association, at the Parliamentary Select Committee oral hearings of Petitions against the HS2 Bill.

My objections to HS2's planning application No 2022/3352/HS2 may be summarised as follows:

- The design is unsuited to the overall setting. This part of Park Village East is Grade II\* listed, and lies in a conservation area. The design pays insufficient attention to the enormous historic significance of the site.
- The headhouse is not shown to be necessary and/or the application is premature. There are multiple closely adjacent headhouses also proposed. Design of the tunnelling beneath it is still incomplete, and until that has been finalised, it cannot be shown that this headhouse is necessary.
- The application does not give a fair representation of the likely overall appearance in the context of the setting. It does not indicate just how out of character the proposed headhouse, with its enormous gates, sprawling along a significant length of the street, will be in relation to the Nash architecture in the rest of the street.
- The provision of a large car parking area is unnecessary and inappropriate to the setting.
- The proposed entrance gate is now situated some distance along the road due to the presence of the car park and therefore increasing the overall damage to the setting. Still further, the extravagant size of the entrance gate is excessively dominant and intrusive.
- The proposed lighting scheme is unnecessary or excessive, and likely to be very detrimental to local residents and in particular to their sleep at night.

I also agree with each of the various points made by the Camden Town Conservation Area Advisory Committee, (CTCAAC) in their objections filed on 26 August 2022.

#### **The Setting – Park Village East ("PVE") – brief history**

1. The north end of Park Village East is listed Grade II\* at <https://historicengland.org.uk/listing/the-list/list-entry/1322056?section=official-list-entry> as follows:

TQ2883SE PARK VILLAGE EAST 798-1/82/1281 (West side) 14/05/74 Nos.2-16, 22-34, 36A & B (Even) and attached railings

Street of 12 semi-detached and 4 detached, related villas. 1825-36. Designed and laid out by John Nash and his assistants. For the Commissioners of Woods, Forests and Land Revenues. Picturesque series of 2 and 3 storey stucco detached villas of varying styles. ...  
[proceeds to describe the individual houses] [emphasis added]

2. The listing therefore applies to the street as a whole (including the section at Nos.2-16, opposite to and most affected by the Headhouse), and for good reason as shown below.
3. The whole of this part of the street also forms part of the Regent's Park Conservation Area.

4. The Park Village (i.e. Park Villages East and West) comprises a highly significant development, architecturally and historically, designed by John Nash as part of his overall scheme for the Regent's Park. The houses in PVE were built in the 1820s-1830s.
5. Designed as "*rus in urbe*" ("the countryside within the town"), Park Village East and West form part of John Nash's overall scheme for Regent's Park. In 1902 the odd numbered "cottages" on the east side of PVE were demolished to make way for the widening of the railway, except for the York & Albany Tavern of 1827 (Grade II\* listed) and the historic Indoor Riding School of 1892 built in the grounds of the Tavern Tea Garden now known as 1 Park Village East and presently owned and occupied by a production company and film and photographic studio. The even numbered cottages on the west side 2-18 and 22-36 remain intact. (No.20 was destroyed by enemy action in WWII and a block of flats is now on the site).
6. Geoffrey Tyack in his scholarly article "John Nash and the Park Village" [Georgian Group Journal, 1993] reviews the history, discussing Nash's intentions. He notes (p.70) that "Nash can therefore take the credit for having initiated the first architect-designed villa suburb in London, and probably the world" and concludes (p.73):
 

*"One of the most striking things about the Park Village is the enormous variety of different architectural styles and house plans to be seen there. Nash understood that there was a large clientele of people from the professional and commercial middle classes who were prepared to pay for houses which satisfied their yearning to be different, to be private, and to enjoy the illusion of rus in urbe. He was able to articulate this commercial insight with the wit and panache which had been a hallmark of his work throughout his career. So, in his old age, this most inventive of architects made one of the most far-reaching 19th-century contributions to the way in which we live now."* [emphasis added]
7. In the book "John Nash: Architect of the Picturesque", edited Geoffrey Tyack [2013], Professor J. Mordaunt Crook similarly notes (p.94) "*It is difficult to overestimate the importance of John Nash's idea*" and concludes (p.95):
 

*"Right at the end of his career he was able to put into practice — as it were in microcosm — those notions of the urban picturesque that he had already tried out in diluted form within the larger arena of Regent's Park itself. The two Park Villages, East and West, together came to form 'a miniature garden suburb in the very heart of London'. In his biography of Pennethorne, Geoffrey Tyack rightly calls this 'perhaps the most original contribution of 19th-century London to urban civilisation' ... In terms of architectural theory, Park Village has become a classic of suburban imagery."* [emphasis added]
8. Indeed scholars and students of architecture still visit the Park Village as part of their studies of John Nash and 19th century architecture. My late wife, and others in the street, used to entertain the Georgian Group and others when they visited.
9. The importance of PVE as part of Nash's vision for Regent's Park was recognised from the start, in that it was depicted in a well-known group of prints by T. H. Shepherd included in Elmes' set of "Metropolitan Improvements", 1829. I reproduce it below, together with a more recent photograph (taken before HS2 went to work) from a similar viewpoint.

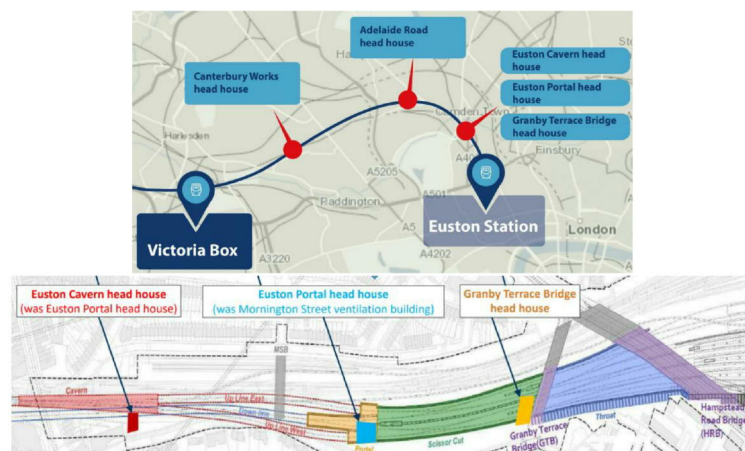


Little has changed other than clothing fashions and modes of transport. The York & Albany pub is the white building on the right-hand side at the top of the street. Next to it, in the lower photo, is the red bricked building at 1 Park Village East. My home at 8PVE is behind the horse (top photo) or next to the second parked car (lower photo). The proposed headhouse site is directly opposite that, where the “plantation” (green vegetation) is shown in the lower photo.

10. For all of the above reasons, and as HS2 apparently accepts in principle, it is vital that if the headhouse is to be built at all, extreme effort is made to ensure that it does not intrude into the setting, and to the extent that it needs to be built and has to be seen at all, its design is as unobtrusive as possible. I submit that it has not succeeded.

**Is this headhouse necessary at all? The application is premature.**

11. I am not a railway or tunnelling engineer and therefore can only comment in general terms. However, it is legitimate to ask whether the headhouse is necessary at all, and the application does not appear to address it. If not shown to be necessary, permission should be refused.
12. I am bewildered why a headhouse on this site is considered necessary, considering the number of other headhouses that HS2 proposes in close proximity on the line. There is already one proposed on Adelaide Road and then three placed very close together on the Euston approach. While safety should of course always be paramount, three headhouses seem excessive – belt, braces, and still something else besides? See HS2’s own graphics at <https://s3-eu-west-1.amazonaws.com/commonplace-cloudfront/resources/projects/hs2ineuston/Euston+v2b.compressed.pdf>



The headhouse the subject of the current planning application is the one on the left, shown in red in the above. It is reasonable to ask why three are needed in such close proximity, including the present one in a conservation area in a site of special architectural interest. Other headhouses on this line stand alone and are much more widely separated. The huge “Victoria Box” crossover site at Old Oak Common is only shown as having a single headhouse.

13. It is also significant to note that although a headhouse at this site was being proposed at the time when the select committee hearings took place in 2015-2016, the design of the tunnelling is now very different. At that time HS2 were proposing a “birdcage” structure, substantially under the roadway in Park Village East. That has since been scrapped, and likely to be replaced by a proposed so-called “three tunnels” design, taking a very different approach.
14. However it is not apparent that there has been any review of whether this headhouse is still required at this site, or whether its design remains relevant. The design of the tunnelling to go underneath it is still incomplete and unknown. Baroness Vere, speaking for the Department for Transport, stated in a written Parliamentary answer dated 27 July 2022:  
 “Details of the final design are expected to be available to share. HS2 plan to finalise and share the tunnel design in spring 2023 and will keep the community informed if dates change, with tunnelling due to start in mid to late 2023”. [emphasis added]
15. In the circumstances, the present planning application is (at the least) premature and it should be rejected, at least at this time.



### Renderings of the proposed headhouse

16. Although HS2 clearly has access to talented graphic artists and photographers, the selection of images it has chosen to illustrate the application owes more to advocacy – an attempt to press its own case – than to a fair representation of the overall impact of the proposed design.
17. The application includes numerous photographs of the area as of now. Many seem to have very little to do with the application itself, and those that do tend to present the site in poor weather and with scruffy looking vegetation. By contrast there are renderings of the proposed headhouse shown in good light, embellished with happy pedestrians going about their business.
18. There is a notable lack of illustrations showing how the headhouse structure might appear in the setting of PVE, with the Nash villas shown as well. One might have supposed, given the architectural importance of the setting, that a fair attempt would have been made to show this. Instead, the nearest is a group of three images in the document entitled

21. 1MC03-SCJ\_SDH-LS-DPH-SS01\_SL03-299139\_C01 - Visualisation View 39.PDF

This is one of them – the “best”, as the others are no more helpful:



It is heavily cropped top and bottom (by HS2, in the original – I have included their own grey borders in this screenshot). Thus it does not give a fair overall view of the headhouse in the PVE setting. And how clever of HS2 to include the black gate at the left, much larger (due to the perspective) than the massive new big black gates on the right, thereby downplaying their effect.

19. My best attempt at a more balanced representation (in spite of the lack of usable HS2 source material for this purpose), is this:



(Left side is the same photo as on page 3 above – current HS2 lorrypark works mean it's not now possible today to take a better shot from a different angle. Right hand side is from HS2 rendering above. Pictures superimposed so that the York & Albany pub and 1PVE were of the same size. Clearly the images can't completely align, but they do well enough to give a useful impression).

20. The composite image above doesn't crop the houses top and bottom, and it shows more of the other houses in the street – including in particular 8PVE – than HS2's unhelpful renderings.

21. A further composite version, but with a distorted perspective, David Hockney style, is below:



22. Or even this, again in false perspective but arranged so that the size and position of the York & Albany pub matches in the two images:



23. The point that these renderings seek to make is how out of character the proposed headhouse, with its enormous gates, sprawling along a significant length of the street, will be in relation to John Nash's Georgian architecture in the rest of the street.

24. This mismatch becomes still more apparent when considering details of the design.

#### Detailed headhouse design

25. Regrettably, the fine detail of the headhouse design is not visible in the renderings of the street as a whole that HS2 has provided. In this regard I share the views expressed by the CTCAAC:

We note that HS2's Independent Design Review panel emphasised the need to develop the architectural detailing of the headhouse building further, to ensure it is of the very high quality required to make a positive contribution to the setting, and to the neighbouring Grade II [*sic* – *actually II\**] listed houses.

Members believe that such refinement has not occurred sufficiently, and specifically that dropping the parapet height further has resulted in the visible part of the structure being squat and without grace.

With the guardrail visible above the parapet, the headhouse will look like a utilitarian box, and the Committee would rather see the brick parapet raised a little, in order that the guard railing is not visible at all. We consider that the visibility of the guardrail is likely to be highly detrimental to visual amenity, however it is designed and constructed, as it will confer a different understanding to the building and reduce its architectural purity as a brick-only structure that "expresses the machine" as is noted as an aspiration in the DAS.

...

Red bricks in the local vicinity are a soft, mellow red and the illustrations appear to show a high-fired red with an impervious surface that would not match well. This needs to be confirmed as non-matching reds would be visually detrimental and would neither preserve nor enhance the CA. [emphasis added]

26. Those problems with the guardrail and brickwork are better seen in this more detailed HS2 rendering (not showing the context of the setting in PVE):



27. In this regard it is also troubling to note that page 34 of the Design and Access Statement shows two brickwork examples captioned:

Figure 33: Precedent studies: Left - Olympic Substation by NORD Architects, Right - Cutty Sark by Grimshaw

Neither of these “precedents” would have had to consider a Grade II\* listed setting.

28. Planting: I also note the statement in para 4.3.4 of the Written Statement at [1MC03-SCJ-IN-STA-SS01\\_SL03-000001 - Written Statement](#):

*"At Year 15 of railway operation, when the planting reaches sufficient height, the Headhouse will predominantly be screened by planting along Park Village East."*

My understanding is that railway operation is unlikely to commence until 2033, another 11 years hence. 15 years after that will be 2048. I am 65 years young now, but fear that I am unlikely to be around to “enjoy” the eventual screening by planting. Meanwhile the design will remain inappropriate to the setting, and very visibly so. This isn’t good enough.

#### **Parking area**

29. The planning application proposes a substantial parking area. However it says almost nothing about why this parking is needed. Para 4.3.14 of the Written Statement, and p.32 of the Design and Access Statement say:

Within the Headhouse compound, there will be:

- A 416m<sup>2</sup> hardstanding area for the parking and manoeuvring of maintenance and emergency vehicles with an access from Park Village East;

30. The space that this parking will take up is excessive for any of these purposes. (Note that HS2 has also previously stated that the road along PVE itself will be used for emergency parking; obviously so, and one hopes this will be very rare).



31. For its appearance, see the image in the Design and Access Statement at page 35:



32. Within this large parking area, a single solitary van is shown. The rest of it lies empty in this image and the reality is that it will forever be all-but-empty:

- Most vehicles accessing the site for occasional maintenance purposes can just as easily pull up in the street itself,
- In the very rare cases of significant emergencies, the street itself will obviously be available for access, as HS2 has acknowledged.
- No reason is given why ANY vehicle should be parked there at any other time.

33. The reality is that much of the headhouse can be built at or below the road level, in itself desirable (though it will still be visible from the upper floors of the adjacent houses). But an opportunistic attempt has then been made to use the whole of its roof as a parking area, despite the actual lack of any objective need for such a large parking area. (As page 32 of the D&A statement notes, the footprint has increased since Scheme Design – and so the car park has been sneakily enlarged). This opportunistic rationale for the very large car park area should not be permitted.

34. It is depressing to think that the site of many of the odd-numbered villas, once an important part of John Nash's scheme for The Regent's Park, would instead now become An HS2 Car Park.

#### Entrance Gate

35. Further, a disproportionately-sized gate is proposed, at some distance from the part of the headhouse visible over the parapet. Both the appearance and the location of this gate needlessly increase the damaging visual impact of the proposed scheme as a whole.

36. See the rendering in the Design and Access Statement at page 37. HS2 has not sought to justify the extravagant size of the gate.



As seen from the renderings above, the gate is more than twice the width of the van shown as parked in the parking area. It is over-dominant and unnecessarily wide.



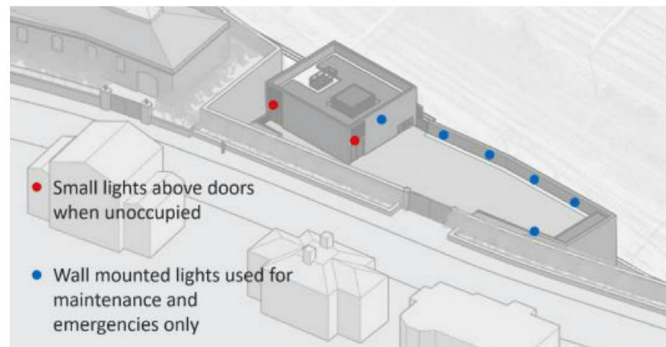
## Lighting

37. The written statement at 3.2.30, amplified at p.36 of the Design and Access Statement, state:

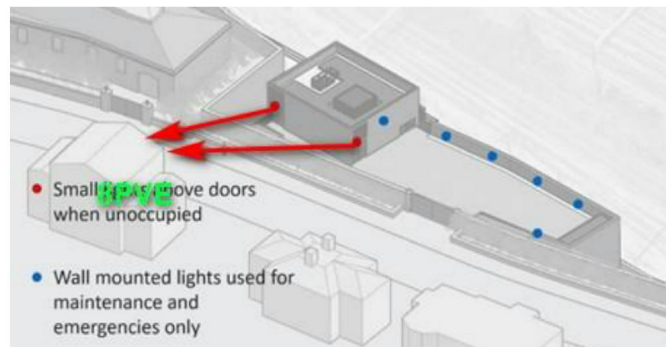
- Under normal operating conditions, during the night, when the site is unoccupied, the compound will not be illuminated in order to minimise lighting pollution, except for the compound entry and key access points to the headhouse building. These areas will be permanently lit throughout night-time period to a minimum illumination level of 5 lux.
- During an emergency or fire at night. The respective zones will be illuminated to 20 lux to enable safe escape from the head house.
- During maintenance events at night, the whole site will be illuminated to 20 lux to enable maintenance works.

38. It also states, with an illustration:

The height of the PVE wall is approximately at 2.8m. Therefore, the light spillage from the site to the Park Village East road will be minimal (see Figure 38).



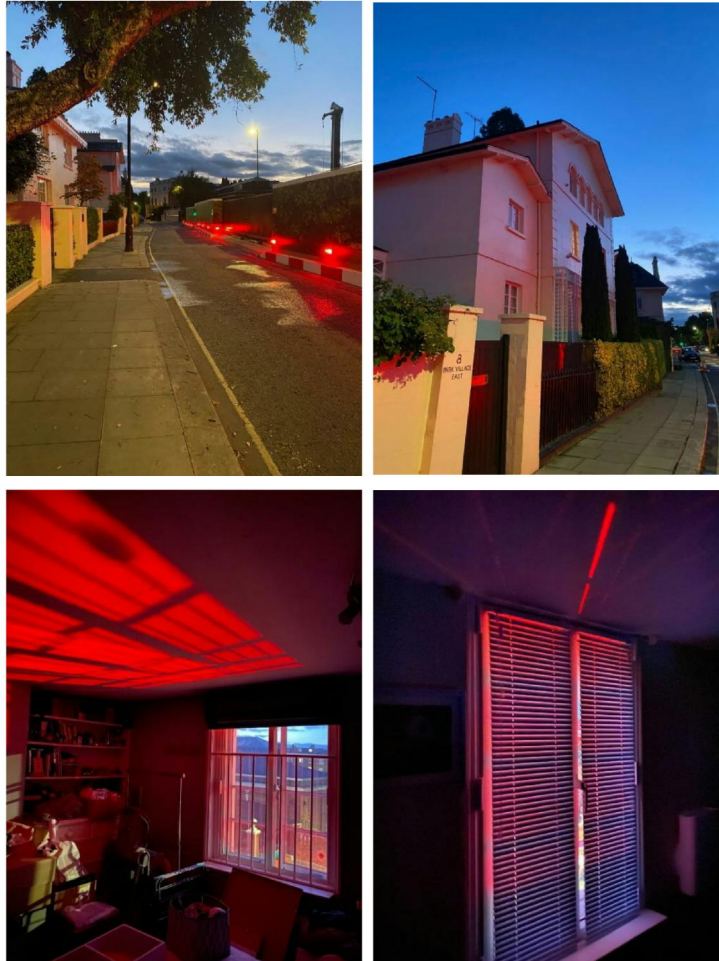
39. Light spillage to the road is one consideration. However this is a residential street and there will clearly be light spillage to the houses, particularly to bedrooms on the upper floors. My home at 8PVE will be affected, among others – my son and daughter-in-law's bedroom faces the street.



No consideration seems to have been given to light pollution to residents' bedrooms.

40. The text states "small lights above doors when unoccupied". There is no need for any such permanently on-at-night lighting at all when unoccupied. It is obtrusive and a needless waste of energy, meeting no requirement at all. The blue lights for emergencies suffice. This above-door lighting should be removed in its entirety.

41. The quote above also refers to “a minimum illumination level of 5 lux”. So it could be brighter, and by an arbitrary amount. This is unacceptable and requires a maximum limit, not a minimum.
42. The definition of “lux” should also be noted. Lux is a unit used to measure the intensity of light hitting a surface, typically a wall or floor in a lighting design. One lux is equivalent to one lumen per square meter. It is not a measure of the brightness of the light bulbs used. HS2 have referred to a minimum illumination of the compound entry and key access points. They have not identified the precise areas of the surfaces involved. Not have they stated the brightness of the lighting to be used to illuminate these areas. Although 5 lux does not sound great, it is not in any sense comparable to e.g. a 5 watt bulb. That would be like mixing yards and gallons. We simply do not know how bright the lighting will be and the extent to which it will be disturbing.
43. However, by way of a benchmark for comparison purposes, it is worth noting here that HS2 has recently created a lorry park at the top of PVE, opposite my home at 8PVE and at the same location as the headhouse will be built. It is fitted with red lights to illuminate it at night. I attach some unedited photos showing how intrusive this lighting is (larger copies available if required):




44. HS2 cannot be trusted to moderate the light pollution likely to be caused by their lighting scheme, and have not explained why permanent lighting at night is needed at all, still less how they intend to prevent it from disturbing residents at night. This planning application should be refused for this reason also.

#### **Summary and conclusions**

45. The application for planning permission should be refused:

- The design, as a whole and in its details, is unsuited to the overall setting. The application does not give a fair representation of the likely overall appearance in the context of the setting, and the effect on the setting.
- The headhouse is not shown to be necessary, and/or the application is premature.
- The provision of a large car parking area is unnecessary and inappropriate to the setting.
- The proposed entrance gate is excessively dominant and intrusive.
- The proposed lighting scheme is unnecessary or excessive.

  
8 Park Village East, NW1 7PX  
11 September 2022