

## **Environmental Justice in the Euston Area:**

### **An Inquiry into the Cumulative Impacts of Development on the Health and Wellbeing of Local People**

This research brief summarises the insight from the detailed report of the Environmental Justice Public Inquiry that was carried out by Voluntary Action Camden, Somers Town Neighbourhood Forum, Environmental Law Foundation and UCL.

The Euston area has been subject to intensive development involving large scale and long-term projects and programmes over the past thirty years, including the development of the British Library (1982-1996) Channel Tunnel Rail Link (1996-2007), Kings Cross redevelopment (2008-ongoing), Francis Crick Institute (2011-2015), and the development of Central Somers Town Project, and CrossRail Link 2, and High Speed Rail 2 (HS2) in the coming decade and beyond. Many smaller projects have also taken place, having a marked effect on the locality. As a result of these developments, local people have witnessed, and experienced at first hand, damaging deterioration of air quality in the area, the decline and loss of their local open green spaces, the felling of mature trees, the clearance and destruction of places holding great cultural and historic significance, and serious problems with housing and amenities. The anticipation of construction stretching far into the future is a constant worry for local people and this has created a state of anxiety and fear.

As the local residents described their experience 'It's about the amount of construction that has happened in this area over 20-30 years...we're not getting any respite from that.'<sup>1</sup> and 'The prospect of all this work continuing until 2033 (and probably longer) is already depressing. I was very happy living on Regents Park Estate but that happiness has gone. I now dread the future.'<sup>2</sup> and 'I am very concerned about the long-term effects of poor air quality on my health; as an older person, I am likely to be particularly vulnerable to this'.<sup>3</sup> During the course of the Environmental Justice Inquiry which took place in September and October 2017, we elicited and received written witness statements and representations from local people and drew together a range of documents collected by local organisations and groups, as well as film and photographic evidence. Site visits took place before each workshop. This body of material from diverse sources forms the basis of this in-depth and longitudinal account of the combined and cumulative impacts upon local people of large-scale, smaller-scale, and long-term development projects in the Euston area. Overall, 91 people participated in the Inquiry, by attending workshops and/or submitting written statements and representations, with further documentary evidence from approximately 1200 people – Somers Town petitioners, residents involved in trying to influence HS2 working groups, and residents outside the area facing similar challenges. In this brief, we propose a set of community-led recommendations and an action plan for making better and more sustainable future planning and environmental management decisions about this area, and how best to manage and improve the local environment, during, and after, major construction works.

This action plan is broad ranging and applies to decision-making on multiple levels of

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<sup>1</sup> Somers Town resident, Workshop 2.

<sup>2</sup> Witness statement

<sup>3</sup> Witness statement

governance, and utilises different management and regulatory techniques, including: policy guidance on air quality, monitoring, planning, and new development; management and mapping tools for air quality; code of conduct for consultation; guidance proposals for community design; guidelines for public engagement and consultation; and manifesto for democratic renewal.

Our inquiry focused on the physical and mental health of people living in the locality, especially contributing to health impact assessments on the likely effects of proposed developments; We looked which compensation for the adverse effects of development projects has been realised and/or safeguarded; Identify the potential health risks from continued development and transportation in the area and what would help to manage and improve the environment during construction work and afterwards; Determine the actual and potential loss of trees and green spaces in the area; and measure how far local people must travel to experience open green space.

Our main findings were as follows:

### **Mental and physical health impacts**

For the people who are living in the Euston area, the state of the environment is a matter of great concern and they point that because of the air pollution, loss of nearby open green spaces, loss of homes, heritage and amenities, and disruption to everyday life are linked with serious depression, anxiety, stress, fear, a sense of despair and hopelessness.

Local people experience an exacerbation of respiratory conditions, such as asthma and chronic obstructive pulmonary disease (COPD) which they associate to the exposure to air pollution in the Euston area, with people's symptoms alleviated when they leave the area, even for a short period.

*"How can all of this be justified in terms of the health of a community or the human right to a healthy environment to live in? To feel the environment around me is shifting so quickly and for the worst is depressing"*

### **Air quality infringements**

EU health standards for air quality are infringed in the Euston area, providing grounds for enforcement action.

*"Noise pollution, light pollution, dust pollution from building work, both destruction and construction of buildings no doubt releases particles into the atmosphere detrimental to health"*

### **Loss of local open green spaces and trees**

The people who live in the Euston area very highly value open green spaces in the area: such spaces are essential to counter the stresses and strains of living in a densely populated

and polluted part of London, and provide a very welcome 'breathing space', and opportunities for playing, socialising, holding community events and connecting with nature. Because of that, there is a strong sense of anger at the loss of open green spaces in the area: the recent closure and subsequent loss of St James's Gardens (a three-acre park) has had a devastating effect on the everyday life of local people. For many, St James's Gardens was a place of peace and tranquillity in a busy and noisy part of London.

The consequences of further development will be similarly devastating to local people - these projects include the Community Investment Programme (CIP) in Central Somers Town which will be reducing the availability of open green spaces in Somers Town (Purchase Street Open Space and Polygon Road Open Space), and particularly the loss of Coopers Lane TRA Community Garden. At another part of the Euston area, in Regent's Park Estate, there is an equally strong sense of anger about the loss of gardens and open spaces as several areas have already been lost to housing development as part of the HS2 programme to re-house people nearby, following demolition of their homes.

The planned felling of approximately 200 mature trees in the Euston area along Cardington Street, Eversholt Street, Hampstead Road, and Euston Road, and in St James's Gardens and Euston Square Gardens, associated with HS2 developments, has led to dismay, anger and disbelief on the part of many local people who consider this a senseless act of ecological destruction. The total number of trees taken by HS2 in Camden is 500, not including those that may be lost as a result of related utility works. Many local people have questioned the need for this, arguing for alternative approaches to this drastic and irreversible act, for example re-routing utilities. There is incredulity that felling mature trees in Euston Square Gardens is to make way for temporary sites for construction vehicles and a taxi rank displaced by work at Euston station. It is also important to recognise that there has been an additional significant loss of trees as a result of the Regent's Park Estate Replacement Homes and Central Somers Town CIP schemes.

Local people identify a close correlation between the loss of open green spaces and trees and declining air quality: this causal connection, substantiated by research, has major implications for urban planning and decision-making.

*"I am a child carer. I have to be aware of the routes to take or to avoid because of bad air pollution"*

### **Loss of amenity, loss of homes and social upheaval**

Local people have lost their homes and been displaced, with many losing valued connections with neighbours and local amenities as a result. The impacts of this have been devastating for many people, especially for vulnerable elderly people who have lived in the area their adult lives.

The new build on green spaces between blocks of housing (to re-house people who have lost their homes to HS2) on the Regent's Park Estate has led to a loss of light and privacy,

compromising the dignity of people in their homes, and creating social divisions and disruption.

In addition to this, disturbance to traffic routes from building works, and changes to rights of way have created difficulties in moving around the area, especially for elderly and disabled people, creating an 'obstacle course' and a 'battlefield'. There are serious concerns about access to the area by ambulances or fire engines and the ability of people to continue accessing social and health facilities.

Building work (from CTRL to HS2) has led to problems with vermin such as mice and rats, which got worse by a refusal on the part of developers to accept their responsibility for this problem.

*"...HS2, destroying 500 mature trees in the area, will affect the air quality further. No new saplings replacing this will make up for the years of pollution we will further endure. There are many schools here and I fear those children are being set up for a future of ill health. Universities study the area on effects of pollution. Yet nothing is done differently... [it carries] on regardless, as if some people are just dispensable in terms of their health."*

### **Loss of places of heritage and history**

There is well-founded dismay and anger on the part of local people that the construction work on St James's Gardens will proceed following the exhumation and reburial of many of the bodies buried across the Gardens and following removal of the remaining monuments and tombstones. The monuments and tombstones served to evoke the life of the Gardens as a burial ground (1790-1853) and provided a highly valued connection to the rich history and heritage of the Euston area, of which many people in the area are rightly proud.

The decline and planned loss of Euston Square Gardens, with many mature and fine trees providing cover, severs an important link for local people to the history of the Square, and its central place in the community: the Gardens formerly housed a nursery and remnants of the 'nursemaid's tunnels', which originally joined two parts of the park, can still be seen. In this very fast changing urban landscape, such connections to the past carry great significance for local people.

### **Inadequate and unsecured compensation and planning agreements**

Compensation for disturbance and loss of amenities during construction is insufficiently protected: Coopers Lane TRA Community Garden, secured by local residents as compensation for many years of air, noise and light pollution and dust entering their homes from the construction of CTRL only few years ago, is now to be lost as a result of Central Somers Town. The planned loss of this private shared garden (and its replacement with a public open space of indeterminate quality) is unfair and unjust. There is a legitimate expectation that this well-tended, and regularly used, community garden was theirs to keep, as a hard won 'reward' for their persistence and strength in confronting CTRL about the many and unacceptable disturbances and impacts arising from the St Pancras development over a seven year period.

'Compensation' for the loss of trees, felled to make way for HS2 development, is grossly inadequate and unfairly located in parts of Camden other than the Euston area: planting of saplings elsewhere in the borough cannot possibly compensate sufficiently for the loss of a diversity of mature trees in this area, which already lacks greenery and tree and plant life.

Financial compensation for the 1,300 households in Euston that qualify for noise insulation from HS2. On 16 December 2016 the House of Lords made a strong recommendation that compensation schemes, including the Voluntary Purchase Scheme, Owner-Occupier Cash Option and Lump Sum to Residential Tenants, should be extended to Euston households. Despite the commencement of early works, details of a construction compensation scheme for Euston have yet to be published.

### **Poor consultation, communication and accountability**

The consultation processes for Central Somers Town have been criticised as flawed due to a lack of clarity about the consequences of the planned rebuilding of Edith Neville Primary School and St Aloysius Nursery, in particular the loss of open green space to make way for Brill Place Tower. Consultation on this point also failed to differentiate between responses from local residents and people with far less attachment to the area. The scale of the Tower was unclear, with early consultation referring to a 10-storey tower, compared to current plans for 25 storeys.

Consultation and communication with CTRL was, in retrospect, relatively good in the period following a public inquiry in which CTRL's working practices (which had been 24 hour) were made subject to control by local people and a hotline and drop in sessions at the Tenants Hall were set up to further improve communication between local people and the developer. The provision of Coopers Lane TRA Community Garden provides an example of a positive outcome for the community from development in the area, making its planned loss even harder to bear.

There has been, and continues to be, a lack of clarity about which authority, or developer is responsible for a development, associated works, and the ensuing impacts: this creates difficulties for local residents who wish to complain about certain activities or hardships arising from a development project.

Local people express a sense of 'helplessness' and 'hopelessness' about the scale and nature of development in the area: although there exist plenty of opportunities for consultation and making submissions and representations, there is a strong sense that the views of local people are 'simply not heard' when these oppose the interests of business, private developers and economic development.

*"Managed decline of green spaces in RPE (and Purchase Street Open Space in Somers Town) led to accusations of spaces not being used and therefore ripe for development."*

### **Procedural flaws and inadequacies**

Local people are increasingly 'losing faith' in a local planning system in which Camden Council operates as developer, landowner and decision maker; this combining of functions is considered to prevent adequate 'checks and balances'.

The role of independent experts has been overlooked: the independent peer review, commissioned by Camden Town District Management Committee, of the Air Quality Assessment supporting the planning application for Central Somers Town raised fundamental questions about key methodological approaches and conclusions in the AQA. Although submitted in a timely manner, Camden Council did not consider this independent review.

A narrow and limited approach to environmental assessment characterises decision making on development in the Euston area, especially the Central Somers Town. There is a strong argument that the particular social and environmental conditions in Somers Town and the Euston area more generally - notably high numbers of elderly and disabled people and children with vulnerabilities and cumulative nature of the impacts warranted a fuller use of this decision making tool, in terms of detailed environmental impact assessment, equalities assessment and health impact assessment. These conditions also suggest strongly the need for a full local open space survey.

### **Unequal burdens and benefits of development**

*'The community in Somers Town area has had to live for years with environmental pollution due to past developments including St Pancras, Francis Crick Institute, in addition to digging of roads for various amenities. Crossrail 2 and many other building works in the planning will, if they go ahead, lay siege for years to the area, with the fallout on the community being noise, dust, transport/mobility issues for disabled and elderly people and children. This area needs a break.'*

The great burden of pollution, loss of open green space, and amenities falls unfairly on elderly and disabled people who are more susceptible to poor health conditions and are likely to have greater difficulty moving around an area criss-crossed with building works, and with changes to walkways and reduced and altered disabled parking bays, and bus routes and stops.

There is also considerable concern on the part of local people about the adverse and damaging impacts of these environmental problems (especially poor air quality and the loss of open green spaces) on the physical and mental health and welfare of children and young people. A real concern is that there are generations of children growing up with unacceptable levels of noise, disturbance and social upheaval.

There is a strong sense that the major developments in the Euston area (the availability of luxury housing, investment in transport infrastructure) are for the benefit of those living outside the area, such as commuters, whilst the burden of these developments falls, unfairly, on those living within the area, the majority of whom are unable to move away.

## **Seriousness of spatial and temporal cumulative effects of development on the area**

An extraordinarily large number of development projects have taken place concurrently and consecutively (seemingly without interruption), over a very long period in the Euston area. When viewed collectively, and over time, this conglomeration of major and smaller-scale development has produced a storm of negative and significant impacts, meted and felt by local people throughout this area. The lack of account taken of the cumulative effects of developments has caused particularly harmful levels of air pollution in the locality. In addition, the very long-term nature of pollution and disturbances to everyday life has created stresses and strains having detrimental effects on people's mental and physical health. The decline and loss of green spaces has exacerbated these negative effects of intense development in the area, whereas such spaces had provided necessary 'breathing spaces' and 'green lungs', as described by local people. Planners, developers, and decision makers should take seriously both the spatial and temporal nature of cumulative impacts on the quality of life of local people and the quality of the local environment as a matter of environmental justice.

## **Summary and way forward**

The Inquiry workshop discussions were often positive, with recommendations for change arising out of discussions about the damaging and disturbing nature of decades of intensive construction work in the locality. Community-based recommendations fall into several categories: reforms to process and decision-making; how to improve living conditions during construction periods; what to include in development planning to improve health and well-being of local people.

However, having listened to and collated evidence from local people about their experience of the health and environmental consequences of developments in the Euston area, it became clear that, for the great majority of participants and witnesses, the source of impacts flowing from numerous developments are not easily distinguishable. Rather, demolitions, clearances, construction works, fitting utilities, and operation of buildings and transport infrastructures from many different developments blend into one another, creating a constant background of noise, pollution, dust, vibration and social upheaval for people living nearby, with harmful effects for health, well-being, and a sense of community and social cohesion.

Three major themes connect these impacts and the experience of them by local people with the concerns of the environmental justice movement: disregard for health and environment, in favour of development; uneven distribution of benefits and burdens; and disregarding special vulnerabilities and needs. These, and other issues that have noted above, can be address through collaboration from all the programmes and plans that are impacting the area.

The full report provides further details on the background of the issues, and the evidence from the inquiry, and can be found at ....