

CONSULTATION STATEMENT

Proposed submission

Euston Area Plan

January 2014

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1 PROCESS OF CONSULTATION AND ENGAGEMENT

Background

- 1.1 The Euston Area Plan (EAP) is being prepared to shape change in the Euston area in the period up to 2031. It is being prepared jointly by the London Borough of Camden (LBC), the Greater London Authority (GLA) and Transport for London (TfL). The plan area is centred around Euston Station and covers Regent's Park to the west and part of Somers Town to the east. To the north, the plan boundary includes Mornington Crescent, as well as the railway tracks running up to Parkway. To the south, the plan boundary includes Euston Road and the northernmost part of Bloomsbury.
- 1.2 The Euston Area Plan is being produced to respond to the proposed new High Speed Two (HS2) rail link, as well as reflecting and updating previous plans and aspirations for development in and around the station. Camden Council strongly opposes the HS2 project as it is concerned about the potential negative impacts on the areas affected by its construction, particularly around Euston and Camden Town. However if HS2 goes ahead, despite Camden Council's objections, it is important that the Council plans ahead to get the best possible results for local people and businesses and to make the most of any potential benefits a new station and rail link could present. If HS2 does not go ahead, the Plan will be useful in refreshing previous plans and encouraging growth in the Euston area.
- 1.3 This report provides a summary of the consultation activities undertaken to date. These activities have helped in the preparation of the draft reports for the formal consultation period to ensure that they are up-to-date and provide the most helpful guidance for residents, applicants and council officers.
- 1.4 These consultation exercises, plus other informal consultation, meet the requirements of Regulations 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 (and previous versions of these regulations) and the Council's Statement of Community Involvement (adopted 2011).
- 1.5 Under the regulations, this statement is required to set out:
 - which bodies and persons were invited to make representations under regulation 18;
 - how those bodies and persons were invited to make representations under regulation 18
 - a summary of the main issues raised by the representations made pursuant to regulation 18; and
 - how any representations made pursuant to regulation 18 have been taken into account.

Ongoing stakeholder engagement

- 1.6 The production of the Euston Area Plan has been guided by project Boards, which have members from the GLA, Camden Council and TfL and are also attended by officers from HS2 and Network Rail as key stakeholders for the station and tracks. An overarching Strategic Board provided strategic guidance for the plan, which is chaired by the Leader of Camden Council, Cllr Sarah Hayward. The structure and attendees of the boards is set out in the

illustration below (figure 1). The EAP has been shaped and guided where appropriate by technical information and inputs from HS2 and Network Rail, and the board process has been essential to the creation of the plan.

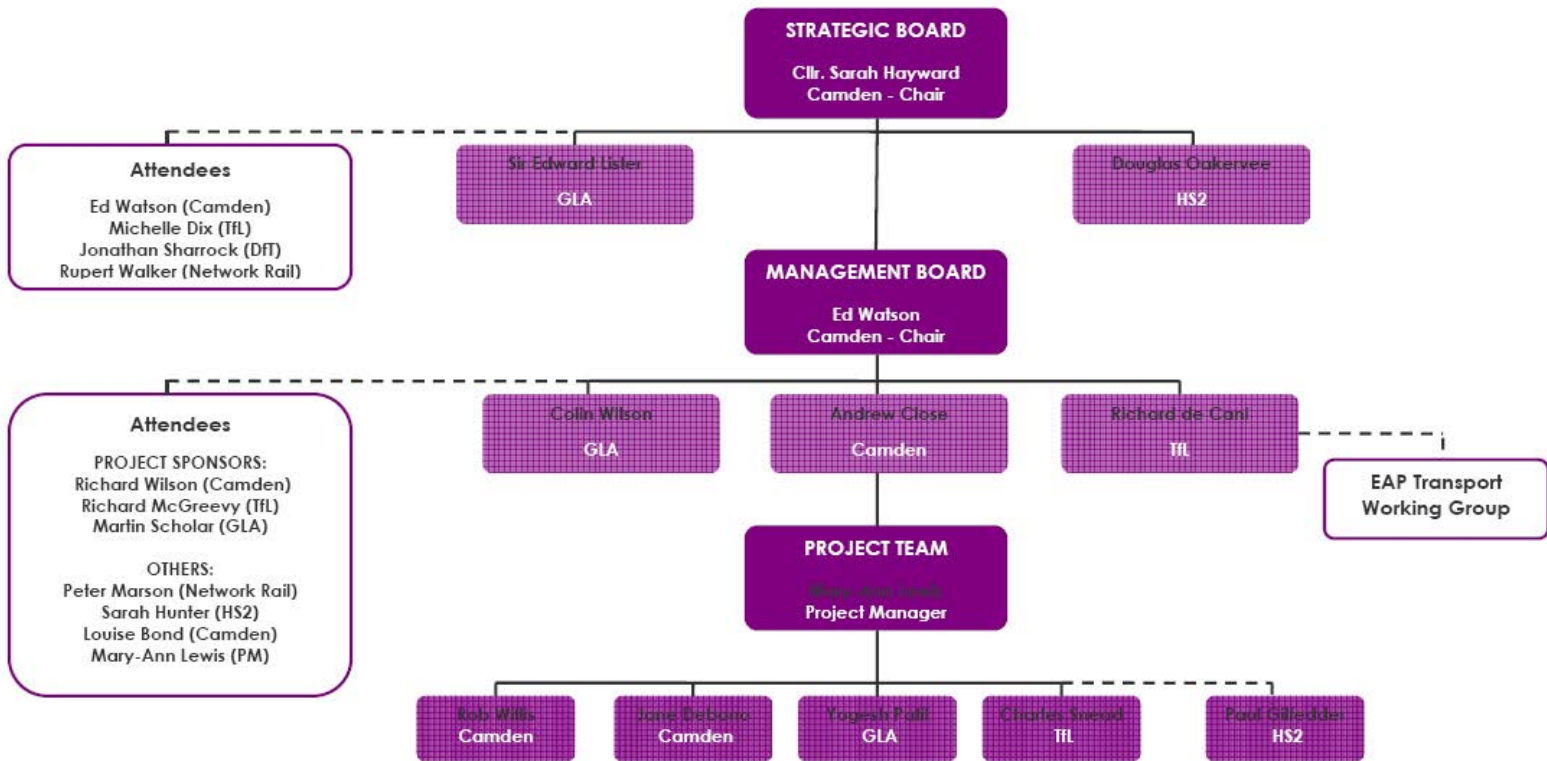


Figure 1: EAP governance structure

1.7 Throughout the process the EAP team has also met with key resident groups to talk through emerging plans, attending the planning meetings of the West Euston Partnership and liaising with the Somers Town Neighbourhood Forum since their formation in the summer 2013.

Bodies and persons invited to make representations

1.8 A large number of local businesses and community organisations were invited to make representations on the Euston Area Plan. A list of these bodies and groups is included as **Appendix 1**. In addition, letters were written to all properties within the Euston Area Plan boundary in order to invite local residents and businesses to provide comments on the Plan.

Duty to Cooperate

1.9 To ensure the Council meets its Duty to Cooperate duties the EAP team:

- Liaised with neighbouring and relevant authorities on the HS2 route on the progress of the plan and to invite discussion/comments to meet with the Duty to Cooperate requirements: Written an mail to all constituent

members of the Association of London Borough Planning Officers to invite London boroughs to be involved in the preparation of the EAP (the only response being from Westminster)

- Liaised with the City of Westminster on an ongoing basis including meetings to discuss progress
- Contacted the City of London and Islington to seek their views (but not received a response)
- Wrote to all neighbouring boroughs at Stage 1, Stage 2 and Stage 3 of the consultation process to inform them of the consultation process
- Wrote to Birmingham, Sheffield, Manchester and Leeds to inform them of the consultation of the draft EAP, setting out key strategic elements of the plan and to seek their views. We received a response from Sheffield city Council, who stated that they broadly support the principles and objectives proposed to guide future development, as they would reflect those in the Sheffield Local Plan

Consultation activities

Initial engagement of community organisations and representatives

- 1.10 An initial workshop was held on 11th September 2012 with representatives from a range of local community and business groups. The workshop was divided into two main parts: a walking audit and then a workshop to discuss the priorities for the Euston Area Plan. For the walking audit, the participants were divided into two groups and asked to write down their likes and dislikes on post-it notes whilst walking around two routes in the plan area.
- 1.11 There were strong themes emerging from both the walking audit and the workshop and these were:
- social housing
 - employment
 - Drummond Street
 - St. James's Gardens
 - repurposing/replacing derelict and vacant buildings
 - the design of any future station should HS2 go ahead.
 - A balance between commercial and residential
 - To preserve the character of the area in which they felt pride
 - Many identified issues need attention even if HS2 does not go ahead
 - More consultation was necessary on the impact of HS2 by HS2 although it was acknowledged this was outside of the EAP process
- 1.12 As part of the feedback at the end of the workshop, the groups were asked to identify what they felt were the most important themes from their discussions from the event and they are recorded as:
- Need for social housing and affordable rents
 - Accessibility- blocked by the station
 - Euston Road/Hampstead Road crossing difficulties
 - Problems with the existing station
 - Drop station below ground and develop onto top of it
 - Design should be informed by the surrounding townscape context.

- 1.13 In addition to these final points, it is clear from the worksheets records (see full report) that the groups felt that there was a real opportunity to redevelop different spaces around the area and the negative impact of Euston Road also figured strongly in the discussions. Further, participants felt that Drummond Street was a particularly important area for consideration by the plan and a mix of uses on the new station site was proposed by all the groups.

Stage 1: consultation on priorities and objectives

- 1.14 Stage 1 consultation ran from 5th November to 14th December and focused on the draft key objectives and vision for the EAP. The purpose of the consultation was to:
- inform local residents and businesses about the Euston Area Plan
 - seek their views on the emerging vision and objectives for the area
 - ascertain whether there are any other key issues that should be addressed in the Euston Area Plan.
- 1.15 In order to meet the aims of the consultation strategy, the process used a mixed methods approach to maximise the opportunities for individuals and organisations to comment, including those who traditionally give their views and also to specifically target hard to reach groups. This included the following:
- Developing a broad consultee base:
 - Identify users and stakeholders including interest groups and organisations and set up database
 - Identify community networks and meetings
 - Carry out a gap analysis highlighting hard to reach groups
 - Creation of a bespoke Euston Area Plan website and consultation hub including and discussion forum, twitter feed and email sign up functions for use on ipads
 - A mail out to all residents and businesses in the plan area advertising website, survey and consultation events to ensure those without internet access were made aware of the consultation underway. Approximately 5,000 letters were sent out.
 - A dedicated both on-line and available as a paper copy. The survey:
 - Asked people what uses and routes they would like to see on the new station site, asking respondents to map out their ideas for land use and connections (including on interactive maps on the online version); and
 - Asked people to comment on and prioritise the draft objectives for the plan
 - A range of consultation events (17 events were held or attended in total):
 - A pop-up exhibition detailing the objectives and constraints in the Euston Area
 - Drop-in sessions at Regent's Park library and other community organisations, specifically to target people from the Bengali communities and young people
 - Use of drop in sessions on estates to engage with residents in these areas
 - The meetings with specialist groups
 - Contacting statutory consulters by letter
 - Use of targeted posters and publicity such as 'We are Camden'

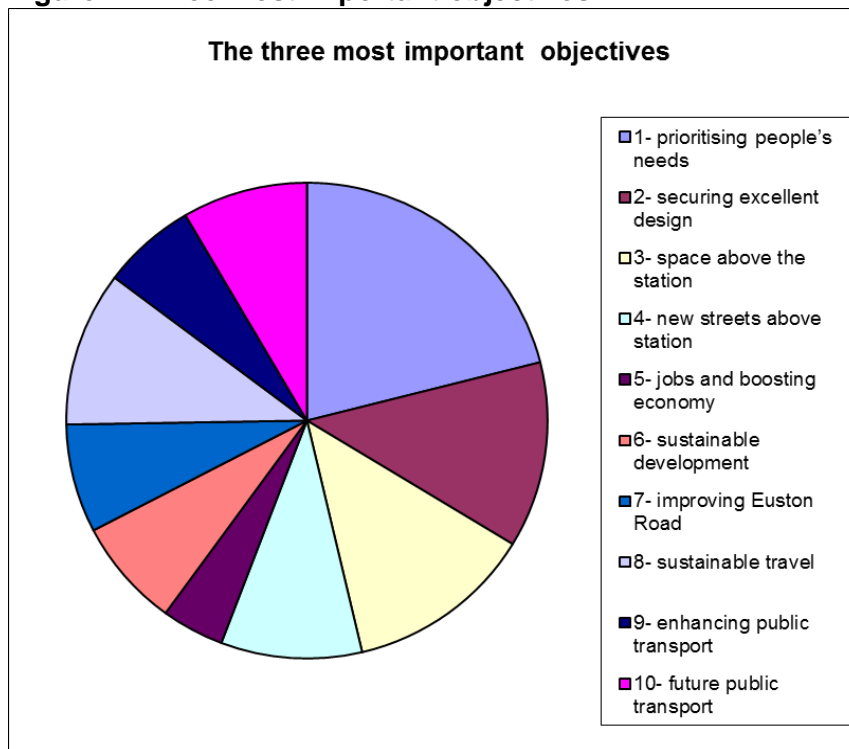
- Maintaining regular contact with interested residents and business focus groups through email bulletins

1.16 62 questionnaires were filled out along with written responses from 18 organisations. Approximately 200 people attended the consultation events.

Key outcomes

1.17 There was general support for the proposed Euston Area Plan objectives, with all objectives being considered as a ‘high or ‘medium’ priority in at least 70% of responses. Figure 1 below highlights the three most important objectives for respondents from the ten listed in the survey. It highlights the importance in prioritising peoples’ needs and securing excellent design in new development, and making the best use of new space above the station and tracks. These results were also broadly consistent with discussions at consultation events and stakeholder events.

Figure 1. Three most important objectives



Objectives	% of times selected as a priority objective
1- prioritising people's needs	21
2- securing excellent design	13
3- space above the station	13
4- new streets above station	10
5- jobs and boosting economy	4
6- sustainable development	7
7- improving Euston Road	7
8- sustainable travel	11
9- enhancing public transport	6
10- future public transport	8
<i>Total</i>	<i>100</i>

- 1.18 Whilst the consultation indicated that the draft objectives reflected the priorities and concerns of local people, a number of detailed comments were made that helped to inform the production of the draft Plan, by highlighting other issues that were important to local people.
- 1.19 Section 2 of this consultation Statement sets out the key other issues that were raised during the stage 1 consultation, alongside the EAP response to the comments received.

Stage 2: consultation on the draft Euston Area Plan

- 1.20 The Stage 2 consultation ran from 29th July to 7th October 2013, and sought the views of the local community, stakeholders and others on the draft Euston Area Plan.
- 1.21 The consultation included a range of consultations methods including a questionnaire survey, events and bespoke meetings:
- 5,800 letters and enclosed questionnaire surveys were mailed out to Euston Area Plan contacts lists, statutory stakeholders and all properties within the Euston Area Plan boundary
 - An online questionnaire survey was provided
 - 600 additional leaflets were handed out at drop-in events
 - 7 public drop-in events held on open spaces across the Euston area
 - 6 bespoke meetings were held along with a community workshop
- 1.22 A number of people responded to the consultation by attending the consultation events, filling in the online survey and responding by email and letter:
- 80 surveys were completed with 55 respondents providing additional comments
 - 45 additional email/ letter responses received
 - Out of the total of 125 responses were received, of which 38 were representing stakeholders (community groups, businesses, organisations)
 - More than 500 individual points of comment were received during the consultation period
 - 200 people attended our drop-in events

Key outcomes

- 1.23 A summary of outcomes from this consultation period is provided in Section 2 below. The key findings from both the survey results and comments received are as follows:
- There was general support for the approach taken by the plan to the station area (i.e. support for improvements to Euston Station) but there were caveats on the need to secure a comprehensive redevelopment of the station which the current HS2 plans on their own do not propose.
 - Survey responses illustrated that the plan was on balance considered to have largely met its objectives.
 - Consultation was robust and provided consistent responses across the consultation tools.
 - All proposal areas, except North Euston Cutting were on balance considered to broadly meet the EAP objectives in the survey with West

Somers Town and Euston Station and tracks considered most frequently by respondents as meeting plan objectives.

- 25 respondents to the survey expressed outright opposition to HS2 coming into Euston which was reflected in the overall results. People want more detail on the proposals in relation to the impact of HS2 should it go ahead.
- The general tenor of responses was that people wanted to see change to the Euston area but were keen for more information about what this may mean.

1.24 The most frequently made comments in written responses from individual respondents (mainly local residents, businesses and frequent visitors to the area) are listed below:

- Outright opposition to HS2
- The EAP should show station design alternatives
- Opposition/ concerns regarding North Euston Cutting proposals. Support for developing over the cutting/ extending cutting to provide open space/ housing
- Concerns regarding the impact of buses/ taxis on the local area
- Support for enhancing Euston Road
- Concern regarding loss of open space
- Concern regarding level of density proposed
- Need for more truly affordable housing
- Support for more housing
- Support for removing the blank façade of the station along Eversholt Street and the provision of an active frontages here

1.25 Key local stakeholders, including landowners and community groups also provided comments on the draft plan and the key comments are below:

- Support from nearby research and higher education institutions for knowledge economy focus (UCL, Wellcome Trust, University of London and the Francis Crick Institute)
- Network Rail sought greater development capacity and more flexibility in approach to employment and retail uses
- HS2: various comments seeking clarifications to text on the potential impacts of HS2 and highlighting the need for appropriate evidence for mitigation references.
- English Heritage: various minor comments to ensure that heritage considerations including the setting of heritage assets is considered/ incorporated
- Euston Community Forum: various concerns around impacts on the local area and the need to consider alternative station design options
- Somers Town Neighbourhood Forum: concerns regarding EAP boundary and impacts on Somers Town.

1.26 The comments received helped to inform changes to the draft Euston Area Plan, in order to take the Plan forward to the proposed submission stage (see Section 2 below).

2. SUMMARY OF ISSUES RAISED AND EAP RESPONSES

- 2.1 The tables below set out a summary of the issues raised during the Stage 1 consultation on the objectives for the Euston Area Plan in autumn 2012, and during consultation on the draft Euston Area Plan, in summer 2013. They also set out the main changes which have been made to the Euston Area Plan in response to the various consultation processes.

STAGE 1 CONSULTATION: EUSTON AREA PLAN OBJECTIVES AND PRIORITIES		
Relevant plan reference	Summary of comments	EAP response and suggested change
(1.2 Vision and objectives)	General support was expressed for the draft EAP objectives during the Stage 1 consultation. Potential number of jobs outlined with an emphasis on knowledge sector jobs	General support welcomed. Tweaks were made to the wording of objectives where appropriate to reflect wider concerns expressed during the consultation such as wider environmental issues in the Euston area (in particular air quality) and the need to protect the historic environment.
(3.1 Overall strategy)	There is a unique opportunity to give the Euston area an identity	The EAP seeks to ensure that Euston establishes a clear identity, with an emphasis on design and public realm quality, enhancing existing built character and centres, and promoting the knowledge economy.
(3.2 Land use strategy)	Housing and in particular affordable housing was the most frequently identified as a land use that needs to be accommodated in the EAP area.	The EAP places a strong emphasis on housing delivery, balanced with the economic potential of the Euston Station and tracks site.
(3.2 Land use strategy)	Consider the future of theatres in the area	Whilst provision for theatres is not specifically made in the EAP, the Plan allows for a mix of uses on the Euston Station site.
(3.2 Land use strategy)	Enhance research and academia in the area	The EAP Land use strategy places a strong emphasis on supporting and promoting the knowledge sector as part of development at Euston.
(3.2 Land use strategy and 3.5 Environment and open space))	Need to replace the existing open space and homes affected by HS2 in the local area	The EAP makes provision of the provision of replacement housing and open space.
(3.2 Land use strategy)	Lack of support for chain shops and large corporations	The EAP provides an emphasis on support for local businesses and training, and includes a specific policy area relating to Drummond street plus the inclusion of meanwhile uses.
(3.3 Design strategy ad	Making the area more permeable, particularly in	The EAP places a strong emphasis on enhancing east-west

STAGE 1 CONSULTATION: EUSTON AREA PLAN OBJECTIVES AND PRIORITIES		
Relevant plan reference	Summary of comments	EAP response and suggested change
3.4 Transport strategy)	terms of east – west connectivity across the station	movement across the area. Improving permeability is reflected in all appropriate policy areas
(3.3 Design strategy)	Respect for the viewing corridors. The new part of Euston should be of human scale and designed for pedestrians and cyclists.	In relation to development, the EAP seeks to balance height and scale of development with creating an attractive, well-designed place that respects the viewing corridors. New green routes are suggested across the plan with priority given to area and pedestrian and cycling routes where possible
(3.3 Design strategy)	Heritage was consistently raised as an important consideration. Heritage assets need to be better identified and the character of conservation areas around the area needs to be reflected in the plan proposals. Importance of getting the design right, respecting local character- specific reference to historic street pattern and other important heritage assets was provided in the draft plan	Explicit reference to the importance of reflecting the historic character was therefore added to the Plan Objectives. Historic character is also addressed in Area policies
(3.3 Design strategy)	Regents Place was commented on several times as not desirable to replicate	The EAP emphasises the need to build on existing character and uniqueness, and the creation of a vibrant place with a mix of uses that fully integrates with its surroundings.
(3.4 Transport strategy)	Linkages for pedestrians/cyclists into and out of the area	The EAP places a strong emphasis on enhancing connectivity and the local environment for pedestrians and cyclists.
(3.5 Environment and open space strategy)	Air pollution during and after completion of HS2 should it go ahead. Air pollution is an important concern for local people in relation to Euston Road generally but also the impact of buses and taxis-	The EAP places an emphasis on addressing air pollution through the promotion of an Ultra Low Emissions Zone, promoting less polluting forms of transport, and promoting urban greening.

STAGE 1 CONSULTATION: EUSTON AREA PLAN OBJECTIVES AND PRIORITIES		
Relevant plan reference	Summary of comments	EAP response and suggested change
	specific policy area related to Euston Road	
(3.5 Environment and open space strategy)	Open space and parks were considered as very important particularly to the north of the plan area	The EAP seeks the provision of replacement open space provided, with additional and enhanced open space to be provided wherever possible alongside new development.
(4.1 Euston Station and tracks	Remove bus station and create park outside station	The EAP provides for the creation of enhanced bus facilities that significantly improve the way that facilities relate to and contribute to the public realm and pedestrian and cyclist connectivity, whilst maintaining and enhancing services for bus users.
4.1 Euston Station and tracks	HS2 station should be built to be two decks below ground to reduce land take	The EAP provides a set of flexible policies and principles that could be implemented under a range of station design scenarios, including one which involves the retention of the existing station footprint.
(3.2 Euston Road)	The importance of addressing the issues of Euston Road was highlighted consistently	A specific policy area is provided relating to Euston Road which highlights the need to enhance connectivity and the quality of the public realm
(4.3 North Euston Cutting)	There was a mixed view on whether the area to the north of Granby Terrace should be decked over: several respondents believed that the space above the tracks between Park Village East/Granby Terrace and Mornington Terrace, the railway cutting, should be kept open, whilst a number of respondents also felt that the railway cutting could be turned into a park or partly used for building replacement homes. However there was consistent reference to the	Decking over was therefore included in the draft EAP with an emphasis on new homes and associated external amenity space and replacement public open space.

STAGE 1 CONSULTATION: EUSTON AREA PLAN OBJECTIVES AND PRIORITIES		
Relevant plan reference	Summary of comments	EAP response and suggested change
	need to respect the historic character of the area and potential support for some additional open space.	
(4.4 Drummond Street and Hampstead Road)	Highlighted the need to retain existing businesses on Drummond Street	The EAP seeks to protect and promote the role of Drummond Street as a unique and successful neighbourhood centre.

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
<ul style="list-style-type: none"> - Part 1.1 Plan Context - Part 1.3 Purpose - Strategic Principle EAP 2 - Design - Development Principle EAP1 – Euston Station and tracks 	Concerns from a number of community groups, including the Euston Community Forum that the plan should show a number of options for station redevelopment, not just the current HS2 proposals.	<p>The draft plan contained policies and design principles which should be applied to any future station redevelopment, however text in these sections has been amended to ensure it is clear that the plan is designed to respond to a variety of station design options.</p> <p>Images relating to station design throughout the document have also been updated to clearly illustrate key principles that can be applied to any station redevelopment, with additional illustrative masterplan insets showing how these principles could be implemented with different station design options. A comprehensive sub surface station design would best meet the EAP objectives if capable of delivery.</p>
Part 1.1 Plan Context	The regeneration potential of the Euston area and station in particular was not considered to have been highlighted adequately in the plan context text.	An additional reference to the regeneration potential of a redeveloped station added to text.
Part 2.4 Key issues	Certainty and evidence of impacts arising from HS2 on the economy, businesses, retail and local infrastructure are not confirmed/ appropriately evidenced, therefore wording should reflect this uncertainty.	Text is drafted to highlight the challenges the area could face resulting from the construction of the HS2 project. However, as impacts are not yet confirmed, language has been slightly amended where appropriate to reflect this uncertainty.
Part 2.4 Key issues	Text should recognise station usage will grow substantially regardless of HS2.	Text has been slightly amended to reflect the existing transport pressures and general growth in the use of Euston Station as well as additional passenger numbers associated with HS2 will create a need for significant infrastructure enhancements to enable the onward movement of passengers.
Part 3.0 – Development	Concerns from a number of community groups,	The EAP will be designed to be flexible to respond to a range

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
strategy - introduction	including the Euston Community Forum that the plan should show a number of options for station redevelopment, not just the current HS2 proposals. The Somers Town Neighbourhood Forum commented that the EAP may be premature if we do not know the eventual station design yet.	<p>of station design scenarios, whilst seeking to influence station design for the benefit of the area.</p> <p>The introductory text to the development strategy has been amended to clearly set out three main options for station design:</p> <ol style="list-style-type: none"> 1: Sub surface comprehensive station redevelopment 2: New high speed terminus alongside existing station 3: Redevelopment on existing station footprint <p>This sets the context for the principles set out in the section 4.1 on Euston Station and tracks. It also highlights how a sub surface comprehensive development would better deliver against EAP objectives.</p>
Part 3.2 Strategic Principle EAP 1 - Land use	Concerns from community groups on the need for more homes, affordability of housing and the mix of housing proposed.	Strategic Principle EAP 1 has been amended with additional text to further emphasis the priority for affordable housing and the need to seek types which are appropriate in the context of the high house prices and market rents in the area, reflecting the wording of the Fitzrovia Area Action Plan which has been agreed with the GLA through the AAP examination process. Text has also been added to state that a mix of unit sizes will be sought and need for family housing in the borough– this is in line with Camden and London Plan policies.
Strategic Principle EAP 1 - Land use	Concerns from local education and research institutions regarding access to affordable housing for staff and the need for student accommodation in the area.	Amendments made to clarify that a proportion of student housing may be appropriate as part of the overall additional housing range set out in Strategic Principle EAP 1, however at least 75% of the housing provided should be as permanent self contained housing (use class C3) as this is the Council's priority land use, and there is a need to retain balanced and mixed communities in line with Camden's Core Strategy policy CS6.

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
Strategic Principles EAP 1, 2, 4	Concerns from community groups on the density of housing development in the plan area	The density of housing and commercial development stated in the plan is considered appropriate in this highly accessible central London location (public transport accessibility level 6 on average) and is in line with the London Plan Sustainable Residential Quality densities (London Plan 2011, Policy 3.4 and table 3.2). The number of homes and jobs that are capable of being accommodated in the area will be dependent upon the station design progressed, and an appropriate ranges for these is set out in Strategic Principle EAP 1 and in the relevant Place Development Principles of the EAP. The highest levels of development are likely to be capable of delivery in association with a sub surface comprehensive station design.
Strategic Principles EAP 1, 2, 4	Concerns from community groups on the use of roof gardens and balconies as a means of meeting open space requirements.	In this central location, and with the constraints involved in station redevelopment and decking over tracks, the overall approach to open space provision is considered appropriate. However, concerns regarding open space are recognised, and given these concerns and the additional development potential identified for the area, the EAP now provides a stronger emphasis on securing additional open space on the northern half of North Euston Cutting, subject to viability/ funding availability (see Sections 4.1 and 4.3). Additional emphasis has also been placed on the provision of local open spaces on vacant/ underused land on Regent's Park Estate in order to meet open space needs generated by development. The plan also seeks to improve access to and quality of existing open space in a number of policies, in recognition of the important role of open space in meeting community needs.
Strategic Principle EAP 1	Key stakeholders, including University College	The EAP Economic Vision report (GVA/Aecom, 2013)

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
- Land use	London, the Wellcome Trust, Francis Crick Institute and the University of London supported priority for knowledge based, science and creative industries as part of the overall employment floorspace capacity. Conversely land owners such as Network Rail supported the aspiration to support these uses but expressed concern on proposing 30% of the total employment floorspace.	prepared to support the EAP indicates that around 50,000 sqm of knowledge based, science and creative sector uses (30% of the potential new floorspace indicated in this document) should be pursued as an aspiration, in order to establish meaningful cluster of such uses. Planning applications will be assessed against the 30% proportion and wider viability and delivery issues as appropriate, therefore no changes are suggested. Supporting text in Section 3.2 has been amended to explain the reasoning behind the quantum of knowledge based uses sought, and to state that Camden and the Mayor will <i>promote</i> this level of provision.
Strategic Principles EAP 1 – Land use	Support was expressed for proposed measures to promote local employment opportunities as part of economic growth.	Support noted.
Strategic Principle EAP 1 - Land use	Landowners concerned about the 20,000sqm threshold for new retail provision being too low.	Policy EAP1 has been amended to promote 'in the region of' (rather than 'up to') 20,000 sq m retail at Euston, in order to provide more flexibility. Additional supporting text has also been added to explain the rationale for this figure, and state that this figure does not necessarily represent a fixed limit on potential retail. However, detailed assessments would be required to demonstrate there would not be detrimental impacts on neighbouring centres.
Strategic Principles EAP 1 – Land use	Provision of education facilities (use class D1) should be more clearly identified in the plan to help facilitate the wider knowledge zone aspirations.	Additional text added to clarify the potential circumstances for educational facilities provision in the Land Use Strategy, Strategic Principle EAP 1. Where they support the provision of the core research and development and work towards the aspiration of achieving a knowledge cluster here they may be appropriate.

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
Strategic Principle EAP 2 - Design	English Heritage suggested additional text to strengthen the position on the setting of heritage assets and views.	Additional text which highlights the need to consider the setting of heritage assets and local views as well as strategic views when considering development heights in the area.
Strategic Principle EAP 2 - Design	The City of Westminster expressed general support for the approach taken in the draft EAP and suggested an assessment of impacts of tall buildings on views, including from neighbouring boroughs/ views from Regent's Park.	Further work is being carried out in support of the proposed submission EAP to assess impacts of tall buildings on local views, in consultation with the City of Westminster.
Strategic Principle EAP 3 - Transport	Concern about attributing all passenger growth at Euston Station to HS2, as much of the growth will be on existing rail lines.	Text slightly amended to reflect this point throughout the document.
Strategic Principle EAP 3 - Transport	Network Rail highlighted the need to clarify the type of new and improved station infrastructure at Euston required.	Additional text, as suggested by Network Rail, added to set out expectations of enhanced rail station facilities at Euston more clearly.
Strategic Principle EAP 3 - Transport Development Principle EAP 1 (Euston Station) and 4 (Drummond Street)	Concerns from community groups, businesses and residents on the layout and extent of taxi provision shown around Cobourg Street.	Text has been amended to clarify the first preference to provide taxi ranking and standing on new streets and public realm associated with the station footprint away from residential uses wherever possible, to reduce impacts on the existing surrounding streets.
Strategic Principle EAP 4 – Environment and Open Space	Network Rail questioned whether an energy centre could be delivered on the Euston Station site given railway constraints including platforms and tracks	Text amended to seek an energy centre on or in the vicinity of the station site in recognition of the potential constraints associated with redeveloping the station itself.
Strategic Principle EAP 4 – Environment and Open Space	Thames Water sought additional text to require adequate water and wastewater infrastructure to serve all new developments to be included.	Additional text as suggested by Thames Water in relation to water and wastewater infrastructure requirements added.
Strategic Principle EAP 4 – Environment and Open Space	Concern was expressed about air quality in the area, with Euston Road and Hampstead Road highlighted as key problem area	The EAP seeks to establish and Ultra Low Emissions Zone at Euston, in addition to the provision of green infrastructure (such as more street trees) to help combat air quality issues.
Development Principle	Community groups and individuals expressed a	Additional text added highlighting Camden's policies relating to

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
EAP 1- Euston Station and tracks	strong desire to prioritise independent shops and traders within new floorspace created at the station site.	small and independent retail.
Development Principle EAP 1 – Euston Station and tracks	HS2 and Network Rail highlighted the potential constraints associated with railway infrastructure which could affect the potential to deliver ground level routes.	The level and type of route provided will be dependent upon station design, and this is highlighted in the text. To ensure the plan is not misleading or inaccurate, text highlighting that constraints associated with railway infrastructure may affect the ability to deliver ground level routes, but the aspiration remains to achieve ground level routes where ever possible is retained.
Development Principle EAP 1 – Euston Station and tracks	HS2 and Network Rail highlighted the Euston Station Development options work and greater development capacity potential associated with a comprehensive station redevelopment based on retaining the existing station and building the new high speed station alongside this.	The plan identifies a range of homes and jobs figures that could potentially be appropriate for delivery on the station site. The level of development achieved will be dependent upon the station design progressed, railway infrastructure and decking viability, social infrastructure provision and would also be influenced by the policies contained in the EAP and other London Plan and LB Camden policies.
Development Principle EAP 1 – Euston Station and tracks	Concerns about the viability of delivering affordable housing and open space and expectations for planning obligations and the expense of providing decking above the station were highlighted by several stakeholders/ landowners.	Camden’s existing policies and text regarding flexibility in the implementation of affordable housing are reflected in the EAP to reflect the viability constraints associated with the constrained sites in the area. Additional text has been added to ensure it is clear that development will be considered in the context of these policies which include flexibility to take into account viability and other constraints that affect the ability of development to meet policy targets for affordable housing, open space and planning obligations. Developers will be expected to demonstrate why they cannot meet policy targets within this policy framework, and this will be considered as part of a planning application process. Where relevant, known

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		constraints that could affect viability are acknowledged in the EAP.
Development Principle EAP 1 – Euston Station and tracks and EAP 7 – West Somers Town	Support from some respondents for introducing active frontages along Eversholt Street in place of the existing blank station wall, and for improvements to area in front of the station	Support noted.
Development Principle EAP 2 – Euston Road	English Heritage and others noted the need to improve the gardens and carefully reinstate them if required by HS2.	Additional text added to clarify expectations for the reinstatement of Euston Square Gardens should they be required by HS2 during construction.
Development Principle EAP 2 – Euston Road	A number of respondents highlighted the need to improve connectivity and the public realm along Euston Road	Development Principle EAP2 places a strong emphasis on enhancing the environment and improving connections across Euston Road.
Development Principle EAP 3 – North Euston Cutting	Community groups and survey results indicated that there were concerns about density and design of development in the cutting area, particularly in terms of its sensitive context – conservation area setting and generally lower density residential nature.	Camden’s prioritises the delivery of new homes, and the potential to deck over under-utilised centrally located space to provide new housing will help to meet housing need/ demand and make the best use of brownfield land. In order to address concerns on density, design and the historic context, additional text has been added to further strengthen the requirements in relation to design and landscaping and the need to carefully assess and demonstrate how the proposals could successfully relate and respond to the wider townscape, particularly the fine grained historic terraces overlooking the cutting.
Development Principle EAP 3 – North Euston Cutting	Where space above the tracks is decked, a number of respondees expressed a desire to maximise the amount of open space and/or housing provided here	The draft EAP text highlighted the potential for further open space to be provided on the northern half of the cutting, but noted the need for additional funding. This has been strengthened in the proposed submission EAP, which shows the open space on illustrative masterplans with additional

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		supporting text to add emphasis on its delivery (particularly under higher development scenarios). The supporting text also highlights potential constraints associated with developing over the cutting, as engineering requirements may not allow for the entire cutting to be decked over.
Development Principle EAP 4 – Drummond Street and Hampstead Road	Concerns were expressed by local residents, community groups and businesses about the need to retain flexibility on the size of shop units in Drummond Street. One respondent also highlighted the need to allow vacant units to be converted to residential use.	Ensuring businesses along Drummond Street remain viable is a key priority for the Euston Area Plan, therefore the text has been amended to remove limits on unit sizes and to reflect the need for some flexibility. The text has been amended to avoid change of use to residential at ground floor level, as the loss of active uses at street level would be likely to harm the vibrancy and vitality of the street.
Development Principle EAP 4 – Drummond Street and Hampstead Road	Business groups along Stephenson Way request public realm improvements to this street to complement those suggested in the wider area.	Stephenson Way added as a street where public realm improvements will be encouraged.
Development Principle EAP 5 – Regents Park Estate	LB Camden Housing consultation has identified potential sites for infill housing on the estate. A number of respondees to the consultation suggested that infill housing within the estate identified as part of this process should be identified in the Euston Area Plan.	Infill housing potential sites identified through LBC Housing's consultation with local residents are now identified in the illustrative masterplan. The associated number of replacement homes these sites will provide has been identified in the Regents Park Estate section with the caveat that the Council will continue to work with the local community to investigate the feasibility of these and any further opportunities for infill.
Development Principle EAP 5 – Regents Park Estate	Community concerns about the potential development of open space for infill housing.	Parts of the infill replacement housing sites rely on the redevelopment of some housing green space within the Regents Park Estate. Additional text has been added to Development Principle EAP5 that refers to 'taking opportunities to provide new open spaces'. In the supporting text, emphasis has been placed on

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		the provision of new local open spaces on vacant/ underused land on the estate in order address these impacts.
Development Principle EAP 5 – Regents Park Estate	Community concerns regarding the potential impacts of extra traffic on the quiet feel of the estate	Additional text has been added in relation to transport and public realm to emphasise that any new and improved links would focus on cycle and pedestrian movement, with traffic calming measures introduced where appropriate.
Development Principle EAP 6 – Ampt Hill & Mornington Crescent	Community concerns around new development and aspirations to enhance routes and legibility around Ampt Hill estate due to previous crime and safety problems on the estate which have been perceived as resolved through gating open space.	Additional text has been added under the aspiration to reinstate historic street patterns, to reference the need to ensure that the safety and security of residents is not compromised.
Development Principle EAP 6 and EAP 1	Community concerns around the inclusion of bus facilities on Eversholt Street.	The Eversholt Street bus facilities are included to facilitate the reorganisation of bus infrastructure at the front of the station, and to enable buses to terminate and turn around. The text in Section 4.6 emphasises the need to ensure that facilities are designed to minimise impacts on surrounding residential amenity and the pedestrian and cycle environment. Outside of the EAP process Camden Council are keen to investigate ways to improve the environment outside the station and the setting of the gardens by considering options for bus facility design. The option of placing bus stops on Euston Road instead of outside the station is considered in the Transport Study for the EAP. This indicates that using Euston Road for additional bus stops would cause significant cost and disruption to the strategic road network.
Development principle EAP7 – West Somers Town	The Somers Town Neighbourhood Forum highlighted a need to consider the impacts of HS2 and the EAP on Somers Town, including	The promotion of connections from Euston to St Pancras reflects principles established in the Camden Core Strategy, and seeks to use existing roads rather than introducing new

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	<p>increased cycle and pedestrian movements through the area. It also questioned the EAP boundary as this part of Somers Town does not fall within a growth area, as well as concerns around the provision of green spaces in new development, the need to consider other land uses for the Drummond Crescent site and the potential to highlight Chalton Street market through signage and way finding.</p> <p>A number of organisations, such as the Francis Crick Institute and British Library welcomed the aspirations to improve links between St Pancras and Euston.</p>	<p>ones. Where relevant, specific design issues could be picked up in the Somers Town Strategy and Somers Town Neighbourhood Plan, which will sit alongside the EAP, but some additional text has been added to highlight the need for any route enhancements to be progressed in discussion with the community and to be balanced with the amenity and safety of residents.</p> <p>Land does not need to fall within a growth area to be part of an Area Action Plan boundary, and the current boundary enables the EAP to manage key sites that will be impacted by, and could help to mitigate the impacts of HS2, including the Drummond Crescent site as well as potentially Crossrail 2 in the future which are strategic infrastructure and therefore outside the provisions of the neighbourhood planning process. Additional text added in Development Principle EAP7 to managing the impacts of construction on the local community, reflecting the potential combined impacts associated with the delivery of Crossrail 2 as well as HS2.</p> <p>Additional wording has also been added to support Chalton Street through enhancements to wayfinding and to the market.</p>

APPENDIX 1. BODIES AND GROUPS INVITED TO MAKE REPRESENTATIONS

The following bodies and groups, along with those in all properties within the Plan boundary, were invited to make representations on the Euston Area Plan.

Agar Grove Tenants Management Co-op Limited	Camden Federation of Tenants and Residents Associations (including federation of Private residents)
Age Concern Camden	Camden Leaseholders forum
Al Rahman Mosque and Community Centre	Camden Neighbourhood Sports Development Team West Euston Kings Cross and Holborn (Camden Council)
Albany Street Police Station	Camden NHS Primary Care Trust
Amphill Square Tenants Residents Association	Camden Peoples Theatre
Argent (King's Cross) Limited	Camden Police Safer Neighbourhoods Team Kings Cross Ward
Argyle Primary School Governors	Camden Police Safer Neighbourhoods Team St Pancras and Somers Town Ward
Ash Sakula Architects	Camden Primary Pupil Referral Unit
Association of Camden Council leaseholders	Camden Railway Heritage Trust
Bayham Place Estate Residents Association	Camden Square Residents' Association
Bell Cornwell LLP	Camden Town CAAC
Bengali Education Centre (South Camden Community School)	Camden Town District Management Committee
Bengali Parent and Tenants Association	Camden Town Unlimited
Bengali Womens Health Project Fitzrovia Neighbourhood Centre Sessions	Camden Village Association
Bengali Workers' Association	Canal and River Trust
Betham Associates	CgMs Consulting
Birmingham City Council	Chester Terrace Residents Association
Bloomsbury Association	Christ Church Church of England School
Bloomsbury Conservation Area Advisory Committee	Churchway Tenants and Residents Association
BNP Paribas	City Beat Community Radio
Bridge Housing Association	City of London Corporation
British Land company plc	City of Westminster
British Library	College Place Tenants and Residents Association
British Transport Police	Co-op Housing Association at Camden Council
Brook (Euston)	Coopers Lane Tenants and Residents Association
C2 Careers Consultancy	Cranleigh House Tenants and Residents Association
Camden Black and Minority Ethnic Alliance	Create Kings Cross
Camden Central Bangladeshi Association	Crown Residents Association
Camden Chinese Community Centre	Crowndale Road Business Forum
Camden Civic Society	Cumberland Market Residents' Association
Camden Community and Police Consultative Group	
Camden Cutting Group	
Camden Cycling Campaign	
Camden Elm Village Tenants and Residents Association	

Curnock Street Tenants and Residents Association
Darwin Court Residents Association
Diorama Arts
Disability in Camden (DISC)
DJ Deloitte
Dron and Wright Property Consultants
Drummond Street Tenants and Residents Association
DTZ
Edith Neville Primary School Governors
Elm Village Residents and Tenants Association
English Heritage
Environment Agency
Environment Agency
Euston Estate (GP) Limited
Eversholt Centre
Fitzrovia Youth in Action
Flaxman Court Tenants and Residents Association
Francis Crick Institute
Friends House Euston Road
Friends of the British Library
Gloucester Avenue Association
GMW Architects
Godwin and Crowndale Tenants Management Co-operative
Goldington Street Estate Tenants and Residents Association
Greater London Authority
Greater London Authority (Housing and Land Directorate)
Green Light Wellbeing Centre
GVA
Hadley Street Residents Association
Highways Agency
Holy Cross Church
Hopscotch Asian Womens Centre
India Spice Shop
Jeebon Bengali Healthy Living Consortium
Kings Cross Conservation Area Advisory Committee
Kings Cross Safer Neighbourhood Panel
LB Ealing (Planning)
LB Islington
Leeds City Council
Leighton Road Neighbourhood Association
Local Intervention Fire Education
London and Continental Railways
London Borough of Barnet

London Borough of Brent
London Borough of Haringey
London Borough of Islington
London Fire Brigade
London First
Manchester City Council
Margaret Centre
Maria Fidelis School
Mayford Tenants and Residents Association
Mayor's Office for Policing and Crime/Metropolitan Police Service
Methodist International Centre
Metropolitan Police Camden
Mobile Operators Association
Monica Shaw Court
Moorfields Eye Hospital NHS Foundation Trust
Mornington Area Action Group
Mornington Crescent Group
Mornington Crescent Residents Association
National Grid
Natural England
Netley Primary School
Network Rail
New Diorama Theatre
New Horizon Youth Centre
NHS Camden
North Westminster Against HS2
Oakshott TRA
One KX Community Centre
One Prince of Wales Residents
Ossulston Estate 2 Leaseholders
Ossulston Tenants and Residents Association
Pan Arts
Pan Camden HS2 Alliance
Village and Environs Residents Association
Park Village East Residents
Peabody
Pheonix Court Community Tenants Association
Plot 10 Play Centre
Primrose Hill CAAC
Primrose Hill HS2 Reference Group
Quickwood Residents Association
Reachview Close Residents Association
Regent Square Residents Association
Regent's Canal CAAC
Regents Park
Regent's Park After School Club

Regent's Park Conservation Area
 Advisory Committee
 Regent's Park Children's Centre
 Regent's Park Labour Party
 Regent's Park Library
 Regents Park Medical Centre
 Regent's Park Somali Welfare
 Association
 Regents Park Tenants and Residents
 Association
 Remploy London Euston (Jobseekers)
 Respond
 Rotary Club of St Pancras
 Royal Borough of Kensington and
 Chelsea
 Royal College of General Practitioners
 Royal Mail
 Safer Neighbourhoods Regents Park
 team
 Safer Neighbourhoods St Pancras and
 Somers Town
 Saint Anne's Church
 Saint Georges (Antioch Greek
 Orthodox) Cathedral
 Samuel Lithgow Youth Centre
 Save Drummond Street
 Scotscare older peoples lunch
 (Euston)
 Shahjalal Jame Masjid (Euston
 Mosque)
 Shake Ur Arts
 Shaw Theatre
 Sheffield City Council
 Silverdale
 Somers Town Bengali Cultural
 Association
 Somers Town Community Centre
 Somers Town Community Sports
 Centre
 Somers Town Youth Centre
 South Camden Community School
 Woburn Walk Residents and Traders Association
 Spectrum (Students Charity)
 Sph Housing - St Pancras and
 Humanist Housing Association
 St Aloysius Church (Roman Catholic)
 St Aloysius Junior School
 St Martins Community Drop in Centre
 St Mary and St Pancras Primary
 School Governors
 St Mary's Church
 St Pancras & Huminus Housing
 St Pancras Community Centre
 St Pancras Parish Church
 Stalbridge House Residents
 Association
 Thames Water Property Services
 Thames Water Utilities Ltd
 The Origin Housing Group
 The PR office
 Third Age Project
 Training Link
 Transport For London - Land Use
 Planning
 Transport for London Corporate
 Finance – Property Development
 TSSA (Transport Salaried Staffs'
 Association)
 University College Hospital
 University College London
 University of London
 Warren Court Residents Association
 Wellcome Trust
 West Euston Healthy Community
 Project
 West Euston Partnership
 West Euston Timebank
 West Hampstead Local Consultation
 Group
 Westminster City Council
 Westminster Kingsway College
 Westminster North