

# Euston Area Plan

## Sustainability Appraisal of Main Modifications

September 2014

## SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS

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## 1. INTRODUCTION

In simple terms, Sustainability Appraisal (SA) is a process of assessment to ensure that sustainability is at the heart of decisions on the preparation of new planning policies. In relation to the Euston Area Plan document it helps ensure that the formation of policies and area based principles achieves an appropriate balance of positive social, environmental and economic outcomes for Camden and that any adverse effects are minimised or effectively mitigated.

A full sustainability appraisal was carried out for the Euston Area Plan (EAP3 of the Examination Document Library) in parallel with the policy development process. It has been an iterative process that intends to provide constructive assessment of policy options to ensure that negative impacts on sustainability are minimised.

This Sustainability Appraisal of proposed Main Modifications has been produced to assist the ongoing public examination of the Euston Area Plan following the close of the public hearing sessions, which took place in July 2014. The EAP team has produced a proposed schedule of main modifications in the light of public representations made on the Plan up to 5th March 2014 and discussions at the public hearings.

The schedule of main modifications proposed has been published alongside this Sustainability Appraisal. The main modifications are changes that, when taken together, materially affect the policies set out in the Plan, and are likely to be necessary to ensure that the all elements if the Euston Area Plan are fully sound and legally compliant.

This Appraisal considers any significant changes that have not been appraised previously and should be read alongside the previous Sustainability Appraisal (EAP3). Both Appraisals have been prepared in accordance with government guidance and fulfil the requirements of the Planning and Compulsory Purchase Act 2004 and the European Strategic Environmental Assessment Directive (2001/42/EC).

## 2. APPROACH

Each of the main modifications have been assessed against the sustainability appraisal objectives, which were used in the previous Sustainability Appraisal (document EAP3), and are listed in Table 1 below.

Appendix 1 to this report sets out this assessment of the main modifications. It identifies whether or not each proposed modification is likely to have any significant implications, and identifies any new or altered sustainability impacts.

In order to ensure consistency, the additional appraisal work has been carried out using the same objectives as those used at previous stages of the SA process for the Euston Area Plan, and has tested the proposed main modifications in the same manner. A set of 16 key SA objectives were developed through the Scoping Report, which were based on the SA objectives that were developed to assess the adopted Camden Core Strategy 2010-2025. Each objective is supported by a number of criteria to assist assessment as to the potential impacts.

Table 1: SA Objectives

No.	Objective	Criteria
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> <li>a) Will the Area Plan increase the net supply of housing, including affordable housing?</li> <li>b) Will the Area Plan protect and promote affordable housing development?</li> <li>c) Will the Area Plan provide housing for people, particularly families, on low to moderate incomes?</li> <li>d) Will the Area Plan encourage development at an appropriate density, standard, size and mix?</li> </ul>
2	To promote a healthy and safe community	<ul style="list-style-type: none"> <li>a) Will the Area Plan protect and enhance the provision of healthcare and other emergency services facilities in the area?</li> <li>b) Will the Area Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities?</li> <li>c) Will the Area Plan help reduce levels of crime and fear of crime?</li> </ul>
3	To ensure access to local shopping, community, and leisure facilities and access to and enhancement of open space	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage mixed-use development?</li> <li>b) Will the Area Plan encourage the retention and development of key services?</li> <li>c) Will the Area Plan encourage the location of services in proximity to public transport?</li> <li>d) Will the Area Plan help to increase access to and improve overall open space provision, including children's play space?</li> </ul>
4	To tackle poverty and social exclusion	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage development that facilitates social cohesion?</li> <li>b) Will the Area Plan provide for equality of access for all to facilities, buildings and services?</li> <li>c) Will the Area Plan encourage development opportunities in those areas in need of economic development?</li> </ul>
5	To encourage and accommodate sustainable economic growth and employment opportunity	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage the retention and growth of existing, locally based industries?</li> <li>b) Will the Area Plan accommodate new and expanding businesses?</li> <li>c) Will the Area Plan encourage new investment in the local economy and promote development opportunities for employment?</li> <li>d) Will the Area Plan focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy?</li> </ul>
6	To maximise the benefits of regeneration and development to promote sustainable communities	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage sustainable inward investment that will promote social wellbeing and benefit the economy?</li> <li>b) Will the Area Plan promote access to employment opportunities for local people?</li> <li>c) Will the Area Plan protect existing and provide for new education facilities to meet needs, both for existing and new residents?</li> </ul>

Table 1: SA Objectives		
No.	Objective	Criteria
7	To promote high quality and sustainable urban design which protects and enhances the historic environment	<ul style="list-style-type: none"> <li>a) Will the Area Plan provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape and strategic views?</li> <li>b) Will the Area Plan ensure enhancement of the public realm and local distinctiveness?</li> <li>c) Will the Area Plan ensure protection and enhancement of the historic significance of heritage assets and their settings and the wider historic environment?</li> <li>d) Will the Area Plan encourage the use of sustainable design and construction?</li> </ul>
8	To ensure new development makes efficient use of land, buildings and infrastructure.	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</li> <li>b) Will the Area Plan ensure efficient use of land through maximising densities where appropriate?</li> </ul>
9	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage development at locations that enable walking, cycling and/or the use of public transport?</li> <li>b) Will the Area Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport?</li> <li>c) Will the Area Plan encourage access for all to public transport?</li> <li>d) Will the Area Plan encourage an increase in car free and car capped housing?</li> <li>e) Will the Area Plan enhance permeability of the area for access by non motorised forms of transport?</li> </ul>
10	To improve amenity by minimising the impacts associated with noise	<ul style="list-style-type: none"> <li>a) Will the Area Plan ensure that noise from existing and new developments and operations will not affect new or existing noise sensitive development or land uses?</li> <li>b) Will the Area Plan ensure new noise sensitive uses are not located near existing established noise generating uses?</li> </ul>
11	To protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change	<ul style="list-style-type: none"> <li>a) Will the Area Plan promote the sustainable use of water resources?</li> <li>b) Will the Area Plan encourage development that incorporates sustainable drainage?</li> <li>c) Will the Area Plan help to reduce the risk of flooding and increase flood resilience?</li> </ul>

Table 1: SA Objectives		
No.	Objective	Criteria
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> <li>a) Will the Area Plan protect and enhance natural habitats in the area, particularly those of priority species?</li> <li>b) Will the Area Plan provide for the protection of biodiversity and open space in the area?</li> <li>c) Will the Area Plan encourage the creation of new habitats, including through the provision of additional open space and green roofs?</li> <li>d) Will the Area Plan protect and provide for the planting of more trees in the area?</li> </ul>
13	To reduce the amount of waste requiring final disposal	<ul style="list-style-type: none"> <li>a) Will the Area Plan ensure reduction of waste during the development process and/or operation?</li> <li>b) Does the Area Plan encourage the movement of waste up the hierarchy?</li> </ul>
14	To improve air quality	<ul style="list-style-type: none"> <li>a) Will the Area Plan reduce CO2 and other greenhouse gas concentrations in the atmosphere?</li> <li>b) Will the Area Plan reduce the discharge of particulate matter to the atmosphere?</li> <li>c) Will the Area Plan contribute to an improvement of air quality?</li> </ul>
15	To provide for the efficient use of energy in order to mitigate and adapt to the potential impacts of climate change	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage the generation and use of renewable and low carbon energy?</li> <li>b) Will the Area Plan promote designs that facilitate efficient use of energy both to mitigate against and adapt to the potential impacts of climate change.</li> </ul>
16	To minimise the use of fossil fuels, aggregates and non-renewable resources.	<ul style="list-style-type: none"> <li>a) Will the Area Plan encourage more efficient supply and use of natural resources?</li> <li>b) Will the Area Plan encourage sustainable design and construction?</li> <li>c) Will the Area Plan encourage the use of alternative modes of transport to the private car?</li> </ul>

In order to attribute likely impacts against these objectives an assessment matrix was developed that included the objectives and columns for carrying out the appraisal (see Appendix 1). This matrix is consistent with the approach used in the SA of the Camden Core Strategy 2010- 2025 and Camden Development Policies adopted Nov 2010, and the Sustainability Appraisal of the Proposed Submission version of the Euston Area Plan. Within the assessment matrix, the effects on the issues are depicted by symbols (see Table 2 below).

Table 2 Attributing effects to each objective: symbols used in the SA Assessment Matrix

++	Likely large positive impact
+	Likely positive impact
+-	Likely positive and negative impacts
0	Uncertain impact or no relationship
-	Likely negative impact
--	Likely large negative impact

A summary of sustainability implications is also provided in Appendix 1 alongside the matrix, in order to explain the reasoning behind this appraisal and its outcomes (see Appendix 1).

### 3. CONCLUSION

The assessment and commentary provided in Appendix 1 below indicate that the proposed Main Modifications do not significantly affect the overall findings of the Sustainability Appraisal of the Proposed Submission Euston Area Plan in terms of delivering positive sustainability outcomes when set against the relevant criteria.

The assessment indicated that, where there is a likely effect, the proposed modifications would assist in providing greater clarity to the principles set out in the Euston Area Plan.

In general the Main Modifications will have positive sustainability impacts, by introducing references to ways in which the Plan can contribute to the sustainability objectives. In the very few instances where the proposed modifications will have minor negative impacts, these generally reflect wider constraints or issues, rather than introducing new ones, and provide helpful clarity on issues that would affect future development. These impacts are also compensated for by positive impacts against other sustainability criteria.

# EUSTON AREA PLAN Public Examination

## APPENDIX 1: SUSTAINABILITY APPRAISAL OF PROPOSED MAIN MODIFICATIONS TO THE EUSTON AREA PLAN

### Executive summary

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM1	viii	<i>Amend second paragraph under 'Introduction' to provide an update re HS2 latest context including need for additional provisions in HS2 Bill to enable level deck option</i>	0	0	0	0	0	0	0	0	0	0	0	0	0
MM2	ix	<i>Add text to refer to the Mayor's "Med city" vision</i>	0	+	0	0	+	+	0	+	+	0	0	0	0	0	0	0

### Sustainability appraisal implications

- Modification 1: this is a cross reference to an announcement that was made outside of the EAP process. The EAP already highlights the potential benefits of an approach that lowers all platforms and tracks (e.g. see page 31 – 1: Sub surface comprehensive station redevelopment). This change would therefore have a neutral impact, although it could have a positive overall effect by clarifying the context for the EAP.



- Modification 2: whilst the EAP already promotes the provision of cluster of knowledge-based, medical and creative uses at Euston, this change could have a further impact by highlighting this early on as part of the Vision. This proposed main modification could therefore generate positive impacts in terms of the economy, efficient use of land and transport by providing additional support for a potentially nationally important cluster of knowledge based uses at a major public transport terminus, close to other such facilities (e.g. Francis Crick Institute, Wellcome Trust), which could provide new health related uses for the area.

## Section 1. Introduction

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM3	2	<i>Add text to provide an update re HS2 latest context including need for additional provisions in HS2 Bill to enable level deck option.</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM4	3	<i>Add text to refer to the Mayor's "Med city" vision.</i>	0	+	0	0	+	+	0	+	+	0	0	0	0	0	0	0
MM5	4	<i>Add a new Objective 11 that consolidates EAP aims for Euston Station and reflects its central role in the area and potential wider importance</i>	+	+	+	0	+	+	+	+	+	+	+	0	0	0	0	0
MM6	6	<i>Replace paragraph second sentence in paragraph 2 with new text to clarify the position with regard to the HS2 Bill and its relationship with the Euston Area Plan</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## **Sustainability appraisal implications**

- Modification 3: this is a cross reference to an announcement that was made outside of the EAP process. The EAP already highlights the potential benefits of an approach that lowers all platforms and tracks (e.g. see page 31 – 1: Sub surface comprehensive station redevelopment). This change would therefore have a neutral impact, although it could have a positive overall effect by clarifying the context for the EAP.
- Modification 4: whilst the EAP already promotes the provision of cluster of knowledge-based, medical and creative uses at Euston, this change could have a further impact by highlighting this early on as part of the Vision. This proposed main modification could therefore generate positive impacts in terms of the economy, efficient use of land and transport by providing additional support for a potentially nationally important cluster of knowledge based uses at a major public transport terminus, close to other such facilities (e.g. Francis Crick Institute, Wellcome Trust), which could provide new health related uses for the area.
- Modification 5: Whilst the aims set out in the proposed new objectives are covered elsewhere in the plan, the proposed modification would ensure that these aims are brought together in a consolidated objective early on in the Plan. This would help to ensure that the approach taken takes opportunities to provide an integrated approach to address the full range of issues at Euston Station, including maximising development potential, addressing environmental and accessibility issues and full integration between the design of the station development above.
- Modification 6: this is a clarification of the relative legal status of the EAP and the Hybrid Bill, and how the two relate to station and over site development. As it does not propose a change in approach, or in context, this clarification would have a neutral impact, although it could have a positive overall effect by clarifying the context for the EAP.

## Section 3

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM7	31	<i>Amend 'Euston Station redevelopment context' text to (i) reflect its importance to regeneration and the local, London-wide and national economy, and (ii) to reflect latest position with regards to station design, including current work to develop proposals for a 'level deck' option, as well as for a 'double deck down' option which is being promoted by the local community to reduce required demolitions associated with HS2.</i>	0	0	0	0	+	+	0	+	+	0	0	0	0

## Sustainability appraisal implications

- Modification 7: Whilst the EAP already recognises the importance of Euston Station in terms of regeneration and economic growth, this added emphasis could help to enhance this importance through inclusion as part of the Overall strategy. Therefore whilst having a neutral impact overall this modification could provide additional positive emphasis in terms of regeneration and economic growth, and associated objectives such as enhanced use of land and sustainable travel, highlighting the potential for growth in a highly accessible location.
- This modification also proposes a cross reference to station design considerations that are outside of the EAP process (investigation of level deck and community promotion of double deck down option). The EAP already highlights the potential benefits of an approach that lowers all platforms and tracks (e.g. see page 31 – 1: Sub surface comprehensive station redevelopment), and identifies the potential impacts associated with an expanded station footprint (see also Section 6.4 of the January 2014 Sustainability Appraisal Report for a comparative

EAP Proposed modifications Sustainability Appraisal - Appendix 1  
 assessment of the different station design and development strategy options). This change would therefore have a neutral impact, although it could have a positive overall effect by clarifying the context for the EAP.

## Section 3.2

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM8	34	<i>Strategic Principle EAP1 (section A) amend to highlight Euston Station/ over site development as the key economic opportunity for the area, with specific reference to Med city proposals</i>	0	0	0	0	+	+	0	+	+	0	0	0	0	0	0	0
MM9	34	<i>Strategic Principle EAP1: (section C) add additional text to firm up Med City element of future development and firm up the 30% target for knowledge uses</i>	0	0	0	0	+	+	0	+	+	0	0	0	0	0	0	0
MM10	36-45	<i>(i) amend text on p36, under 'Replacing housing lost as a result of HS2' to reflect latest position regarding timing and approach to replacement housing provision and to clarify wording regarding meanwhile uses, strengthen</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
					<i>wording regarding knowledge based uses, provide clarification regarding approach to seeking local employment (HS2 and over station development), text around mitigating HS2 (references to Silverdale Tenants' hall and Maria Fidelis School)</i>													

### Sustainability appraisal implications

- Modifications 8 and 9: whilst the EAP already promotes economic growth at Euston and the provision of a cluster of knowledge-based, medical and creative uses there, this change could have a further impact by highlighting this more clearly within Strategic Principle EAP1 part A – overall mix. This proposed main modification could therefore generate positive impacts in terms of the economy, efficient use of land and transport by providing additional support for economic growth and for a potentially nationally important cluster of knowledge based uses at a major public transport terminus, close to other such facilities (e.g. Francis Crick Institute, Wellcome Trust), which could provide new health related uses for the area.
- Modification 10: the proposed wording changes do not present a change in approach, but provide clarity on the approach taken to housing re-provision, meanwhile uses, local employment and community facilities re-provision. As such the proposed modification is considered to have a neutral effect.

**Section 3.3**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM11	49	<i>Under 'Building heights, massing and scale', strengthen text regarding impacts on local views, and heritage assets, and to provide clarification regarding building heights</i>	?-	0	0	0	?-	0	++	?-	0	0	0	0	0

**Sustainability appraisal implications**

- Modification 11: the proposed change highlights the need to consider, and provides clarification regarding, the relationship between building heights and heritage assets/ local views. It could have slightly negative impacts in relation to housing and economic growth by highlighting potential impacts on local heritage assets, and the need for a taller building to the north east of the station to be less than 60m tall to not affect the setting of, and views within and of, nationally important heritage assets, although the proposed text highlights existing heritage considerations rather than introducing a new policy constraint. The text would provide strong benefits in terms of heritage protection by ensuring that potential impacts are fully considered.

**Section 3.4**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM12	54/ 55	<i>Sharpen text to clarify approach to walking and cycling and add cross references to measures shown in figure 3.5</i>	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0
MM13	58	<i>Provide more detail on requirements and aspirations for well designed bus facilities text to provide clearer guidance for the provision of new bus facilities (including prioritising pedestrian movement, high quality public realm and also type of facilities/services needed)</i>	0	+	+	0	0	+	+	0	+	0	0	+	0	0	0	0
MM14	58	<i>Managing taxis – add line stating that from 2018 all new taxis will be zero emission capable</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+

**Sustainability appraisal implications**

- Modification 12: This modification would have a generally neutral impact as it would provide cross referencing to existing measures, and clarification regarding the form of proposed measures. However it could provide accessibility benefits, a slightly positive impact, by providing clarity on approach.
- Modification 13: This modification would provide benefits in terms of accessibility, urban design and promoting public transport by clarifying how a new bus facility should contribute towards and enhance public realm/ local environment while providing a high quality bus interchange.

- Modification 14: This modification would have a generally neutral impact as it would provide clarification regarding a requirement for ultra low emissions at Euston, which is already set out in bullet point 7 on page 58. However it could have a slightly positive impact in terms of air quality and energy/ resources by highlighting a specific measure/ timescale that will help to achieve this aim.

### Section 3.5

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM15	60	<i>Amend Strategic Principle EAP4C to highlight retention and planting of new trees</i>	0	0	0	0	0	0	+	0	0	0	0	+	0	+	0	0
MM16	60	<i>Amend Strategic Principle EAP4D to be stronger regarding future delivery of ULEZ (with appropriate caveat in supporting text page 64 as needed), with corresponding changes elsewhere in the document as appropriate</i>	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+
MM17	64	<i>Amend second bullet point on right hand side of page 64 to highlight retention of trees</i>	0	0	0	0	0	0	+	0	0	0	0	+	0	+	0	0
MM18	64	<i>Amend wording under the heading 'Euston Station Ultra Low Emissions Zone' to provide further clarification re ULEZ approach:</i>	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+



### Sustainability appraisal implications

- Modification 15: This change is likely to have an overall neutral impact, as it would provide clarification regarding an existing Euston Area Plan approach to green infrastructure and providing green streets. However it could generate positive impacts in terms of providing more attractive streets, air quality and biodiversity by highlighting the importance of the retention and planting of trees in achieving this.
- Modification 16: This change is likely to generate a positive impact in relation to noise, air quality and energy/ resources by providing stronger emphasis on reducing emissions at Euston. Likely to have a neutral impact in relation to other sustainability objectives.
- Modification 17: This change is likely to have an overall neutral impact, as it would provide clarification regarding an existing Euston Area Plan approach to green infrastructure and providing green streets. However it could generate positive impacts in terms of providing more attractive streets, air quality and biodiversity by highlighting the importance of the retention of trees in achieving this.
- Modification 18: This change is likely to have a generally neutral impact as it provides further clarification regarding an existing element of the plan in relation to the proposed Ultra Low emissions zone. However it is likely to generate slightly positive impacts in relation to noise, air quality and energy/ resources by providing more clarity regarding the implementation of this approach.

### Section 4

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM19	69	<i>Insert introductory text to EAP Section 4, along with new plans, to provide wider context for sub areas.</i>	0	0	0	0	0	0	0	0	0	0	0	0	0

## Sustainability appraisal implications

- Modification 19: this modification would provide clarity regarding the context of the section and would not introduce new policy. It would therefore be likely to have a neutral impact.

### Section 4.1

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM20	69	<i>Add reference to requirement for excellent transport interchange and integrated public realm and above station development as part of reference to creation of a world class station in Development Principle EAP1 text.</i>	+	0	+	0	+	+	+	0	+	0	0	0	0	+	+	0
MM21	73	<i>Amend the text under the heading 'Design' to refer to integration and to clarify what is meant by 'world class design'</i>	+	+	+	0	+	+	++	+	+	0	0	0	0	0	+	0
MM22	74	<i>Amend Euston Arch text to reflect Secretary of Statement in March 2014</i>	0	0	0	0	?+	0	?	0	0	0	0	0	0	0	0	0
MM23	74	<i>Amend the Section under 'Protecting and enhancing strategic views' to refer to heritage assets, and the setting of</i>	?-	0	0	0	?-	0	+	?-	0	0	0	0	0	0	0	0

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
					<i>Regent's Park and Chester Terrace, which are located outside the plan area.</i>													
MM24	75	<i>Provide a cross reference to the transport measures set out in Section 3.4 of the Plan</i>	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0
MM25	75	<i>Amend 'Bus facilities' text to provide more clarity regarding how a 'bus street would help to deliver bus facility priorities set out in EAP Section 3.4 of the Plan</i>																
MM26	77	<i>Amend the first sentence of the first paragraph underneath the heading 'Comprehensive approach' to highlight need for an integrated approach</i>	0	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0
MM27	79	<i>Amend text underneath the heading 'Phasing' to provide further detail regarding expected delivery of development</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Sustainability appraisal implications

- Modification 20: this modification broadly reflects measures already included within the Plan, for example within Strategic Principles EAP2 and EAP3, which refer to creating a world class station design/ interchange and comprehensive above station development. However, positive impacts could result from providing stronger emphasis on the need for integration of the station, public transport interchange, public realm and above station development within Development Principle EAP1.

- Modification 21: Whilst the new text would broadly reflect the principles set out elsewhere in the Plan regarding the relationship between station design and wider place-based issues, a range of positive sustainability impacts could be generated by bringing together these principles to establish the role of world class design in creating a successful, integrated and well-designed place. This includes enhancing the role of station design in facilitating the delivery of new homes, jobs and other uses above the station, as well as an effective transport interchange and an attractive public realm.
- Modification 22: This modification would be likely to generate a neutral impact, as the reference to the Secretary of State request to look into proposals to reinstate the Arch would not be likely to have a significant impact on sustainability objectives and the approach to the re-provision of the arch in the EAP remains unchanged. Whilst the introduction of the Euston Arch could provide an enhanced identity for the area, which could contribute to a positive new image for Euston, careful consideration would need to be given to the siting of any new Arch in order to ensure an appropriate and sensitive approach is taken. In addition, consideration would need to be given to the balance between the delivery of the Arch (and associated costs) and other objectives set out in the Euston Area Plan.
- Modification 23: the proposed change provides clarification regarding the need to consider the impact of development on the setting important heritage assets outside the plan area. This could have slightly negative impacts in relation to housing and economic growth by highlighting a consideration that may affect proposed building heights, although the proposed text highlights existing heritage considerations rather than introducing a new policy constraint. The text would provide benefits in terms of heritage protection by ensuring that the setting of key heritage assets is fully considered.
- Modification 24: Impact would be generally neutral as it provides a cross reference to measures that are already set out in Section 3.4 of the Plan. However there could be some benefit terms of accessibility and sustainable travel by enhancing linkages between the EAP Transport Strategy (Section 3.4 of the EAP) and the wider approach taken to Euston Station in Section 4.1.
- Modification 25: this modification would provide benefits in terms of accessibility, urban design and promoting private transport by setting out how a new bus street should contribute towards an enhanced public realm/ local environment while providing a high quality bus interchange.
- Modification 26: Likely to have a generally neutral impact as it broadly clarifies the approach to ensuring an integrated approach, but does not significantly alter the approach taken in the text. However greater clarification regarding the need for an integrated approach would be likely to generate slight sustainability positive impacts by highlighting the need to ensure that station development, interchange and above station development work together to deliver a successful interchange, public realm and wider development.
- Modification 27: Likely to have a neutral impact as this modification provides clarity regarding the timing of development without amending the overall approach taken to form or quantum of development.

**Section 4.2**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM28	80	<i>Amend third bullet point under 'context' to refer to listed buildings and other heritage assets along Euston Road</i>	0	0	0	0	0	0	+	0	0	0	0	0	0
MM29	80	<i>Add intention to reinstate Stephenson Statue in original location in Euston Square Gardens</i>	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0

**Sustainability appraisal implications**

- Modification 28: Likely to have a neutral impact as it clarifies the existing context rather than providing new principles of guidance. However it would provide a slight benefit in terms of design and heritage by highlighting heritage assets that are relevant to future consideration of development and change in the area.
- Modification 29: Likely to generate a positive impact in terms of design and heritage by returning an intact listed heritage asset which is already on the station site to its original location. This would have a neutral impact in relation to other sustainability objectives.

**Section 4.3**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM30	86-91 (etc)	<i>The 'North Euston Cutting' area is to be renamed the "Camden Cutting". All references to be changed accordingly throughout document.</i>	0	0	0	0	0	0	0	0	0	0	0	0	0
MM31	89	<i>Building heights, massing and scale: add clarity regarding building levels – from existing ground/street levels, plus average storey heights (metres high) – to provide a definable baseline against which proposals can be assessed</i>	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0

**Sustainability appraisal implications**

- Modification 30: Likely to have a neutral impact when assessed against sustainability objectives. Modification would reflect existing community name for this area.
- Modification 31: Modification likely to have a generally neutral impact as it represents a clarification of the existing approach. It would provide a slight benefit in terms of urban design by ensuring that the approach taken to building heights is measured consistently and accurately.

## Section 4.4

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM32	92	<i>Amend fourth bullet point under 'context' to provide more detail regarding historic context/ features as well as townscape issues faced including loss of two thirds of St James's Gardens and blank building frontages.</i>	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
MM33	96	<i>Amend Development Principle EAP4 text regarding public realm improvements around Drummond Street, Euston Street and Stephenson Way. To make more general reference to local traffic management and public realm enhancements</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM34	97	<i>Amend 5<sup>th</sup> bullet point under 'viability, delivery partners and mechanisms...' provide further clarity regarding who is responsible for funding/ delivery of Drummond Street public realm enhancements</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Sustainability appraisal implications**

- Modification 32: Likely to have a neutral impact overall as it describes the existing context, although it could provide a slight urban design/ environmental benefit in drawing attention to key historic features in the area, as well as issues that could be addressed as part of future change.
- Modification 33: This modification is unlikely to have a significant impact when assessed against the sustainability indicators. Whilst the proposed change would represent slight weakening in approach to traffic (replacing restriction to through traffic with creating a pedestrian and cycle friendly place with appropriate traffic management measures), it is considered that this is unlikely to significantly affect issues such as sustainable travel and air quality as the wording retains safeguards to ensure that potential traffic impacts are managed and the focus is on the pedestrian and cycle environment.
- Modification 34: Likely to have a neutral impact as it relates to details of delivery rather than changing the overall approach taken.

**Section 4.5**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM35	98	<i>Amend the first bullet point under 'New</i>	+	0	0	0	0	0	0	+0	0	0	0	0	0



Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		<i>homes' to clarify that around 160 homes would potentially be infill housing developments</i>																

**Sustainability appraisal implications**

- Modification 35: this represents a relatively limited increase in the number of residential properties proposed, and would therefore be likely to have a generally neutral impact. However an increase in the number of homes delivered would create a slight benefit in relation to housing provision. The Euston Area Plan contains policies which seek to ensure that additional homes are supported by provision of appropriate supporting facilities and open space (see Strategic Principle EAP1 – land uses and Development Principle EAP4 – Regent’s Park Estate).

## Section 4.6

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
MM36	100, 101	<i>Amend figure 4.6 (renumbered to figure 4.8) and other relevant plans throughout which show potential development sites including Appendix 2 (list of development sites) to show additional LBC housing infill sites.</i>	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
MM37	104	<i>Amend the first line of Development Principle EAP6 to remove reference to provision of replacement (as opposed to new) homes at Ampthill</i>	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0
MM38	105	<i>Delete the 'Priority for replacement homes' text under 'Uses':</i>	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0
MM39	106	<i>Delete the text under 'Design' – 'Building frontage design' which highlights encouraging walking and cycling through Ampthill London Square</i>	0	?	++	0	0	0	0	0	0	0	0	0	0	0	0	0
MM40	107	<i>Amend 'Replacement housing and long term planning to remove text regarding 'replacement' (as opposed to new) housing</i>	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0
MM41	107	<i>Amend bullet point 4 under 'Delivery partners and mechanisms...' to refer to</i>	0	0	+	0	0	0	0	0	0	0	0	+	0	0	0	0

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
		<i>potential HS2 use of, and a requirement for subsequent reinstatement of, Ampt Hill Square and Harrington Square</i>																
MM42	107	<i>Amend text in bullet points under 'Phasing' regarding timing of delivery of development at Ampt Hill</i>	-+	0	0	0	0	-+	0	0	0	0	0	0	0	0	0	0

### Sustainability appraisal implications

- Modification 36: Likely to have a positive impact in relation to homes and regeneration by supporting the provision of further sites to provide replacement homes. Likely to have a neutral impact in relation to other sustainability objectives.
- Modifications 37, 38, 40 and 42: Likely to have a broadly neutral effect as the modification relates to the timing of housing provision (rather than the form or quantum of such provision), and thus whether they could be delivered in time to provide replacement housing for those lost as a result of HS2. A minor negative impact could result from removing reference to use of the units as replacement homes, which would otherwise help to mitigate the impacts of HS2. However, the changes reflect a reality in terms of likely deliverability issues, and could also provide a positive effect by providing greater overall clarity regarding when housing in this location can be provided.
- Modification 39: this modification removes an emphasis on routes through the Ampt Hill Estate, reflecting community concerns. It could allow for fuller consideration of accessibility issues across the area by setting out a general aim to enhance wider accessibility, although it may result in lesser emphasis on accessibility through the Ampt Hill Estate in particular. This change could therefore generate minor positive and minor negative outcomes in relation to accessibility.
- Modification 41: this modification would provide clarification regarding the potential use of these open spaces during the construction of HS2, and would provide positive outcomes in relation to access to open space and biodiversity by emphasising the need for these spaces to be reinstated following HS2 construction.

**Section 4.7**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM43	108	<i>Page 108: Mention encouragement of Chalton Street enhancements within Development Principle EAP7</i>	0	0	+	+	+	+	+	0	+	0	0	0	0
MM44	110	<i>Page 110, last sentence under 'new and improved retail': Add additional text noting that Camden and the community have aspirations to improve the market</i>	0	0	+	+	+	+	0	0	+	0	0	0	0	0	0	0
MM45	111	<i>Amend first paragraph under 'Open space' to refer to planned use of the playground at Churchway Estate during HS2 construction</i>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
MM46	113	<i>Amend bullet points under 'Phasing' to provide updated/ additional information regarding timing of delivery</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Sustainability appraisal implications**

- Modification 43: This modification would reflect existing text set out on pages 110 (New and improved retail) and 111 (Chalton Street public realm and wayfinding), and therefore would not introduce new policy or guidance. However it would be likely to bring minor positive impacts in relation to access to facilities, regeneration and the local economy, design and the promotion of walking by providing support for the market and street enhancements within the Development Principle itself.

- Modification 44: This modification would not introduce new policy or guidance but would add emphasis to the role of Chalton Street and the existing Camden Council and community support for enhancements under 'New and improved retail'. This would be likely to generate minor positive impacts in relation to access to facilities, regeneration and the local economy, supporting enhancements to a market which provides an alternative, local source of goods for nearby residents and workers.
- Modification 45: Likely to have a broadly neutral impact as it provides a reference to measures that are being taken forward as part of the HS2 Hybrid Bill process. However, it could provide a minor positive impact in relation to access to open space by identifying that Camden will work with HS2 Ltd to ensure appropriate re-provision following construction.
- Modification 46: Likely to have a generally neutral impact as it provides information regarding the timing of the delivery of measures already set out in the Plan. However it would provide the overall benefit of providing more clarity regarding phasing.

**Section 5**

Mod no.	Page	Summary of Main Modification	Housing	Health and safety	Access to facilities	Equality	Economic growth	Benefits of regeneration	Design and environment	Land	Private transport	Noise	Water and floods	Biodiversity	Waste	Air quality	Energy	Resources
			SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
			MM47	(116)	<i>A delivery table is to be added to set out details for the implementation, phasing and key partners for key projects measures identified in the Euston Area Plan as Appendix 1 to the EAP.</i>	0	0	0	0	0	0	0	0	0	0	0	0	0
MM48	117	<i>Set out further details regarding the EAP Management and Strategic Boards as the key delivery bodies and democratic drivers for the plan</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Sustainability appraisal implications**

- Modification 47: the introduction of a delivery table would have a neutral impact in terms of sustainability as it reflects existing text in the plan, but is a summary presentation of these in tabular form.
- Modification 48: likely to have a neutral impact as it relates to the future governance relating to Euston Area Plan matters. However this additional clarity would be likely to enhance wider understanding of how the Euston Area Plan principles will be taken forward in the future.