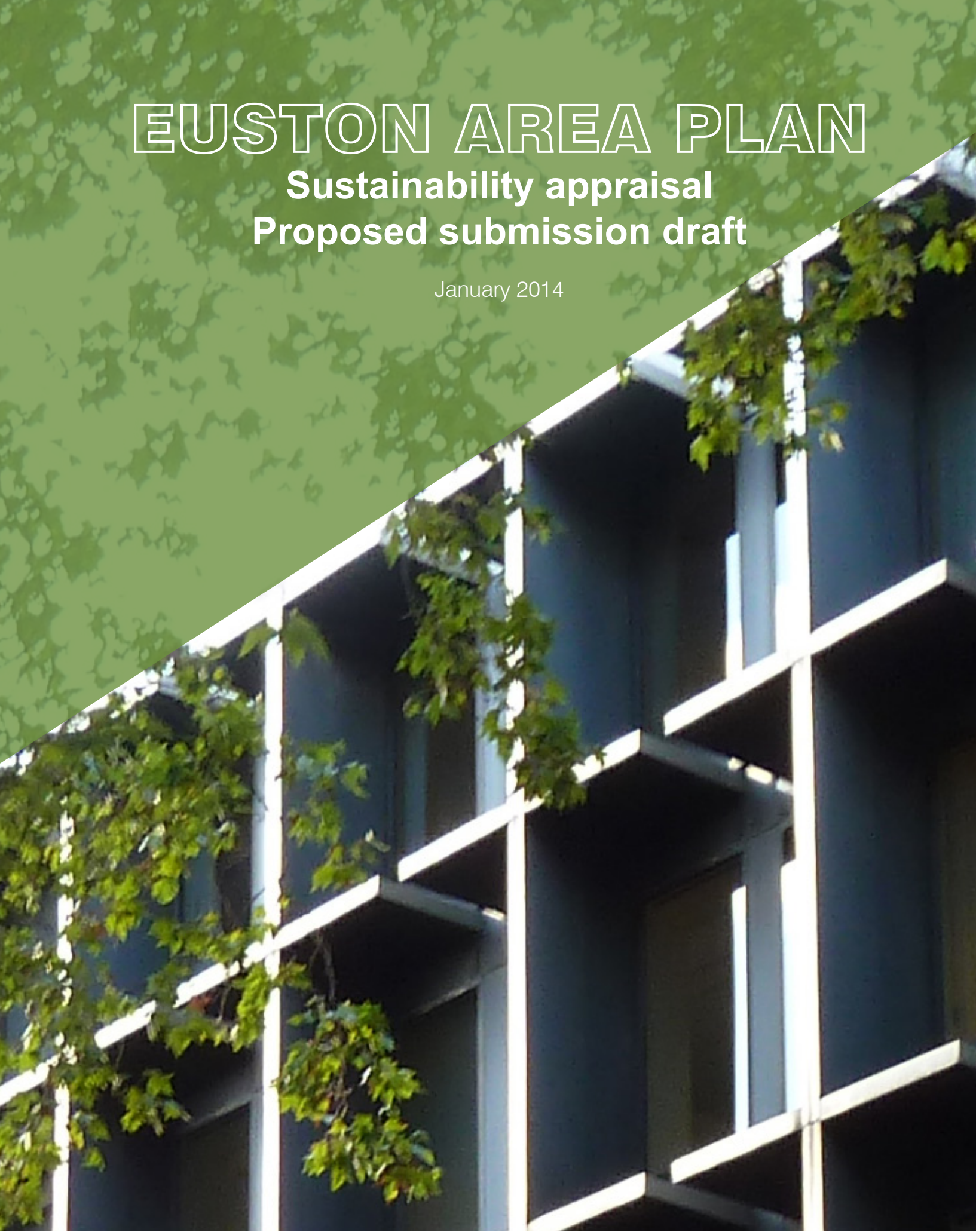


EUSTON AREA PLAN

**Sustainability appraisal
Proposed submission draft**

January 2014



Euston Area Plan Sustainability Appraisal Report – January 2014

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NON-TECHNICAL SUMMARY

1. The Euston Area Plan

Although the London Borough of Camden is opposed to HS2, the Euston Area Plan is being produced jointly by the London Borough of Camden, the Greater London Authority (GLA) and Transport for London (TfL). It will be adopted as part of Camden's formal development plan and also adopted by the GLA as supplementary planning guidance. It will provide a framework to guide development above any new or redeveloped station at Euston and in the surrounding area, within the context of the London Plan, Camden's adopted Core Strategy, Development Policies and Site Allocations, and the proposed HS2 scheme, which includes a London terminus on an expanded Euston station footprint and existing redevelopment and growth aspirations for the area with or without HS2.

The London Borough of Camden does not support the HS2 proposals, however should HS2 proceed, the framework will seek to minimise impacts on local residents and businesses and maximise future benefits for the local area through its status as a jointly produced planning document, and therefore has a valuable mitigation role. In producing the plan Camden Council in no way accepts that the current HS2 proposition for Euston is acceptable and will continue to work to oppose it.

2. What is Sustainability Appraisal?

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.

SA is carried out in parallel with the policy development process and is an iterative process that is intended to provide constructive criticism of policy options to ensure that negative impacts on sustainability are minimised and benefits maximised.

3. The appraisal process

The approach taken to the development of this sustainability appraisal is based on previous work undertaken by the London Borough of Camden for the Core Strategy, updated where necessary, which has informed the baseline data collection, scoping exercise and development of sustainability objectives and criteria that form the SA Framework.

A Scoping Report for the Euston Area Plan Sustainability Appraisal (January 2013) updates the review of plans, policies programmes, and the baseline information provided for the sustainability appraisal of the Camden Core Strategy. This was used to update and amend the sustainability objectives and criteria (the SA Framework) to be used in assessing the sustainability of the Euston Area Plan. The SA Framework covers social, economic and environmental themes.

4. Overall outcome of Sustainability Appraisal

The SA process has found that the overall draft EAP will deliver positive sustainability effects and that the proposed area based principles overall deliver positive benefits in sustainability terms against the relevant sustainability objectives.

Testing the Euston Area Plan objectives against the SA Framework

Overall, this process indicates that the draft strategic objectives are generally successful in seeking to achieve sustainable development, providing positive impacts against social, environmental and economic objectives. Positive impacts include the role of the proposed EAP objectives in mitigating the impacts of HS2, providing new uses and development that meet sustainability goals and measures to improve accessibility and the local environment.

A number of minor changes to the previous objectives were suggested through the SA process in order to expand their coverage, and these have been incorporated into the Euston Area Plan. The objectives are now therefore considered to address all the main elements of sustainability, and contribute positively towards achieving this.

Assessment of strategic options

A number of strategic options were assessed. The Sustainability Appraisal produced the following recommendations regarding the strategic options:

- **Issue 1. Whether to produce an Area Action Plan for Euston:** there would be greater sustainability benefits in producing a Euston Area Plan (than not producing such a plan), as it could be used to mitigate the potential impacts of HS2 as well as seeking to maximise opportunities for new homes, jobs and open space, along with delivering accessibility and public realm improvements;
- **Issue 2. Approach to level of growth:** there would be greater sustainability benefits in seeking to deliver additional growth to Camden Core Strategy figures (rather than keeping to Core Strategy targets) as this would enable opportunities to be maximised to secure more housing and jobs in a highly sustainable, accessible location;
- **Issue 3. Approach to location of growth:** there would be more benefits in providing for new development across the Euston Area Plan area as well as major growth in the defined growth area (rather than just the growth area itself) as this would enable the delivery of additional homes to meet needs, as well as enabling regeneration and environment improvements in the wider area;
- **Issue 4. Station design and development strategy options:**
 - it was found that an approach that sought to maximise decking above a largely sub surface Euston Station and Tracks would provide significant sustainability benefits by enabling the delivery of additional homes and jobs and enabling substantial improvements to accessibility through the area, enhancing the public realm, image and attractiveness of the area. It should be noted however that the feasibility of delivering this scheme in engineering terms has not been fully tested at this stage, and the extent of development shown may not be entirely deliverable.
 - An approach that allowed for a larger concourse above the station (HS2 Option B1 response masterplan) would deliver many of these benefits, but not quite to the same extent due to the additional requirements of railway infrastructure.
 - An approach based on the existing station footprint would allow some benefits as a result of comprehensive redevelopment whilst avoiding the need for mitigation associated with an expanded station footprint. However, it is our understanding that in any future development within the existing footprint it would be difficult to provide ground level streets

therefore it is likely to be challenging to create the benefits associated with these, as with the HS2 option 8 design (see below). A reduced footprint would also potentially deliver less over station development, although it would involve no (or reduced) loss of existing homes and business premises.

- An approach that met the current proposed HS2 Euston Station design (new HS2 design- Option 8) would deliver the least sustainability benefits notwithstanding any reductions in construction impacts, as it would deliver the least accessibility and public realm improvements as well as, potentially, less over-station development. However, the new HS2 station design is a response to cost and programme constraints, therefore is currently the option being progressed by HS2. The EAP should note that a scheme which lowers platforms and tracks and redevelops the station as a whole would be preferable.
- **Issue 5 Approach to North Euston Cutting:**
 - It was found that the delivery of significant housing on the North Euston Cutting (4-10 storeys) would provide a range of benefits by making more effective use of under-utilised land to provide housing, Camden's priority and use. It could allow improvements to connectivity through the area by introducing new routes. However the introduction of development at higher densities could have an impact on heritage assets in the area.
 - The delivery of lower density housing would deliver similar benefits in making more effective use of land to provide housing in a highly accessible area, and would be likely to have a lesser impact on surrounding heritage assets. However, it would fail to maximise the delivery of homes, and viability analysis carried out to support the EAP suggests that this option may not be financially viable.
 - The failure to deliver housing on the North Euston Cutting would significantly reduce the provision of new homes, Camden's priority land use, and would fail to enable the delivery of new connections and open space. It would also fail to enable a comprehensive approach to development alongside the Euston Station and Tracks site, which together provide an effective balance of housing and economic uses in optimised locations.

Appraisal of strategic principles and development principles

The overall Euston Area Plan strategy (Section 3.1) would be likely to generate a number of very positive sustainability impacts. This reflects the fact that the broad intentions of the strategy are to enable the delivery of additional homes, above and beyond growth area targets, maximising potential economic benefits and locating developments in a way which reduces the need to travel. The distribution of development, and approach to public realm and urban greening would help to meet a number of the sustainability criteria relating to air quality, sustainable modes of travel, healthy communities and social inclusion. In relation to individual strategies and development principles:

- The land use strategy (Section 3.2) would be likely to have a neutral or positive impact across the sustainability criteria, providing a balance of uses to meet a range of needs.
- The urban design strategy (Section 3.3) would also be likely to generate a number of positive impacts, due to the environmental, accessibility and public realm improvements that would result from improved connections, spaces and buildings.

- Whilst the transport strategy (Section 3.4) would also be likely to generate positive impacts, it could have potential negative impacts in terms of noise and air pollution resulting from increased transport provision. However, the proposed introduction of an ultra low emissions strategy would be likely to mitigate this.
- The environmental strategy (Section 3.5) would be likely to provide a range of positive impacts due to improvements to energy and climate change mitigation from the proposed local energy network, social and local environment benefits resulting from an emphasis on open space and green infrastructure, and positive impact in terms of air quality and noise as a result of the proposed ultra low emissions zone.
- The area based principles (Section 4) would each be likely to generate social, environmental and economic benefits, each providing land use, design, transport/ public realm and environmental measures to ensure growth meets sustainability objectives.
- The potential for estate infill and renewal, while delivering sustainability benefits overall (for example in relation to the delivery of homes, regeneration and improved streets and spaces), may cause short term disruption to communities due to the level of development activity that may result.

The appraisal highlights the potential impacts of much of the plan in terms of the amount of waste requiring final disposal, as a result of the amount of construction activity that would be generated by significant growth. Construction waste is not addressed in the Euston Area Plan, but is already dealt with in Core Strategy policy CS18 and policies DP22 and DP26 of the Camden Development Policies.

A range of main policy alternatives are addressed in the sustainability appraisal. These are listed as appropriate in Section 7 of the Sustainability appraisal, with the assessment provided in Appendix D.

5. The difference the process made

The Sustainability Appraisal process has helped to confirm that the policies and area based principles represent sustainable options, and has informed how they should be developed with regard to their environmental, social and economic impacts. It has also indicated area where changes could be made to make the Euston Area Plan more sustainable, which have been incorporated into the consultation draft wherever possible.

The production of the Euston Area Plan and Sustainability Appraisal have been carried out in an iterative way, enabling the outcomes of the appraisal to be fed into the Euston Area Plan objectives, policies and area based principles during their preparation. Key ways in which the sustainability appraisal process has informed the approach taken to the Euston Area Plan include:

- Recommendations made regarding adjustments to the Objectives, in order to ensure that they address the full range of sustainability factors. These have been incorporated into the revised objectives contained in the draft Plan and proposed submission plan;
- Informed the decision making process regarding the strategic options for the Euston Area Plan (including the strategic alternatives assessed in Section 6 of this Report, and the assessment of main policy alternatives, which is provided in Appendix D).
- Highlighted the importance of specific issues where growth could affect the environment, for example in relation to noise, air quality, flooding and biodiversity. This has led to relevant measures being incorporated into the

Euston Area Plan where appropriate, in particular informing the proposal for a green infrastructure network to address these issues on an area wide basis.

The SA is not the only factor developing a draft strategy for the area but it is a helpful tool in establishing whether the suggested approaches will foster sustainable development.

1. INTRODUCTION

1.1 Context

- 1.1.1 Euston will undergo significant change over the next fifteen years, including the significant challenges and construction disruption potentially associated with the HS2 project, which Camden are opposing, and the Euston Area Plan is being produced to respond to, manage, and guide that change in order to ensure that local people and businesses can benefit from that change, and to ensure that the area fulfils its potential as a significant urban quarter for London.
- 1.1.2 In January 2012, the government announced its intention to proceed with High Speed Two (HS2), a new high speed rail link connecting London with the midlands and then, in later phases, to the north of England and Scotland. The scheme would include a London terminus on an expanded Euston Station footprint. The project would result in the loss of a large number of homes in the Euston area as well as business premises, open spaces and community facilities, however if the station is well designed in a comprehensive way there is potential to improve the image and lever investment into the Euston area.
- 1.1.4 Because of its impacts on the borough, Camden Council strongly opposes the HS2 project. The Euston Area Plan is being produced to ensure that if the HS2 project proceeds, despite Camden Council's opposition, a plan is developed to help mitigate potential impacts of HS2 and ensure the best outcomes for local people.
- 1.1.5 There is already a range of planning policy and guidance that is relevant to the Euston Area. The London Plan (July 2011) identifies Euston as an opportunity area, with the potential to provide 1,000 homes and 5,000 new jobs. The Camden Core Strategy (November 2010) also identifies Euston as a growth area, with the potential for 1500 homes and 70,000 square metres of employment space and significant new retail. It also sets out a number of key objectives for the Euston area. In April 2009 the London Borough of Camden adopted *Euston: a framework for change*, a supplementary planning document that seeks to guide change in the area.
- 1.1.6 The Euston Area Plan is being prepared jointly by the London Borough of Camden, the Greater London Authority (GLA) and Transport for London (TfL). It will be adopted as part of Camden's formal development plan and also adopted by the GLA as supplementary planning guidance. It will provide a framework to guide development above any new or redeveloped station at Euston and in the surrounding area, within the context of the London Plan, Camden's adopted Core Strategy, Development Policies and Site Allocations, and the proposed HS2 scheme, which includes a London terminus on an expanded Euston station footprint.

1.2 The requirement for Sustainability Appraisal

- 1.2.1 As part of the process for preparing the Euston Area Plan, there is a statutory requirement to undertake a Strategic Environmental Assessment (SEA) and Sustainability Appraisal. These procedures have been combined into a single appraisal process entitled 'Sustainability Appraisal' or 'SA', for which the overall aim is to ensure that each document contributes to the achievement of sustainable development.

- 1.2.2 SA is *'an iterative process undertaken during the preparation of a plan, which identifies and reports on the extent to which the implementation of a plan will achieve the environmental, social and economic objectives by which sustainable development can be defined'*
- 1.2.3 The use of the term SA throughout this document also encompasses any relevant requirements of an SEA. Appendix A to this report includes a table setting out where specific SEA requirements are addressed in this report.
- 1.2.4 SA is an ongoing process, which seeks to improve the sustainability performance of a plan by testing it throughout its preparation in order to expose any weaknesses in its contribution to achieving sustainable development. It is an integral part of good plan-making, and to enable it to be effective and worthwhile, the appraisal must start early in the plan-preparation process. By doing so, SA assists with the identification of sustainability issues and options during the plan preparation process.

1.3 Purpose of this draft Sustainability Appraisal Report

- 1.3.1 This document seeks to determine how the draft Euston Area Plan document promotes sustainability. Its role is to assist with the identification of the appropriate approach, in sustainability terms, to predict implications for sustainable development and put forward recommendations for improvement where necessary.
- 1.3.2 The Euston Area Plan document has been prepared to achieve consistency with and to implement the London Plan, LDF Core Strategy, Development Policies and Site Allocations (as well as the London Plan). These documents have all been subject to sustainability appraisals, which have influenced their content and approach. This sustainability appraisal therefore needs to be read in this context. It will not reappraise the policy directions of the London Plan and Camden Core Strategy, Development Policies and Site Allocations, but rather to look at how the Euston Area Plan can contribute to the common sustainability objectives of the LDF.
- 1.3.3 The earlier sustainability appraisals for the Camden Core Strategy, Development Policies and Site Allocations have provided a framework for the sustainability appraisal of the Euston Area Plan.

1.4 Preparation of the Sustainability Appraisal

- 1.4.2 The Scoping Report was the first stage in incorporating SA into the Euston Area Plan preparation process. The Scoping Report was made available for comment at the same time as an initial consultation on issues for the Euston Area Plan. The Report provided an update on the information supporting the sustainability appraisal of the Camden Core Strategy, Development Policies and Site Allocations, in order to produce an updated framework for the assessment of the Euston Area Plan. It set out a review of the baseline information which gave an understanding of the current state of Camden and how it may change in the future. It included a draft SA Framework and proposals as to how the SA would be carried out. Through consultation with relevant statutory consultees and a wider consultation base, feedback was gained on various elements of the Scoping Report, which were amended as appropriate.

- 1.4.3 A number of minor changes were made to the Scoping Report sustainability appraisal framework, in response to comments made during that consultation, in particular from statutory stakeholders. Following this, the sustainability appraisal framework (see Section 4 and Appendix B to of this Report) was used to assess the sustainability impacts of emerging policies. This was an iterative process, allowing sustainability appraisal to inform the development of detailed options and policies.
- 1.4.4 Consultation was carried from July to October 2013 out in the draft Euston Area Plan (EAP) and associated draft Sustainability Appraisal Report. Following on from this consultation, a number of minor changes were made to the Sustainability Appraisal Report, to respond to comments made on the draft EAP and changes made to the Euston Area Plan (no direct comments were made on the draft Sustainability Appraisal report). Key changes included an updated assessment of station design and development strategy options (see Section 6.4 below); an updated assessment of the key strategic options relating to the North Euston Cutting (see Section 6, issue 5 below); an assessment of cumulative impacts of change on the Somers Town area and on the whole plan area (see Section 7); and an assessment of an alternative option not to provide an open space on a deck over the railway tracks to the north of North Euston Cutting (see Appendix D – Section 4 character areas).

2. EUSTON AREA PLAN CONTENT, VISION, THEMES AND OBJECTIVES

2.1 Purpose and content of the Euston Area Plan

- 2.1.1 The Euston Area Plan (EAP) is being produced jointly by the London Borough of Camden, the Greater London Authority (GLA) and Transport for London (TfL). The plan will provide a framework to guide development above any new or redeveloped Station at Euston and in the surrounding area.
- 2.1.2 The London Borough of Camden does not support the HS2 proposals in its current form due to the significant impacts on the borough, particularly around Euston. However should HS2 proceed, the EAP will seek to minimise impacts on local residents and businesses and maximise future benefits for the local area through its status as a jointly produced planning document, and therefore has a valuable mitigation role.
- 2.1.3 The purpose of the EAP is to provide policies for the Euston area and to allocate key sites for development, within the context of the policies contained in the London Plan and Camden's Core Strategy, Development Policies and Site Allocations, and subsequent updated versions as well as responding to the proposed HS2 scheme, which includes a London terminus on an expanded Euston station footprint. The EAP includes Strategic Principles that cover the whole plan area, and Development Principles for each of seven each sub areas.
- 2.1.4 The boundary for the Euston Area Plan is provided at Appendix 1.

2.2 Vision, themes and objectives

- 2.2.1 A vision and ten key objectives have been produced for the Euston Area Plan. These take into account the specific challenges and opportunities faced in the area, in the context of the wider vision and objectives contained within the Camden Core Strategy, Site Allocations and other relevant planning documents. The vision and objectives as they appear in the draft EAP are set out below. The objectives have been refined to reflect the results of the SA process.

The Vision for the Euston area in 2031

The Euston area will be rejuvenated as both a local hub of activity and a gateway to London through new high quality comprehensive and transformational development above and around a world class transport interchange at Euston Station.

New homes, businesses, shops, community facilities, schools, new and improved public realm and open space will transform the area. The redeveloped station will help to reconnect the communities to the north, south, east and west. Existing businesses, such as those at Drummond Street, and surrounding residential communities at Regent's Park, Somers Town and Mornington Crescent will flourish with investment in reprovided and new homes, businesses, open space and facilities where necessary, and their important role in the future of Euston celebrated and enhanced.

Euston's role as a medical research, knowledge, innovation and creative industry base will be enhanced and thrive around the cluster of world class education and research institutions in the area.

A network of clear and convenient streets will connect key attractions and green spaces in the area. Critical to this will be new and improved links through, above and around a redeveloped station and an improved greener environment along Euston Road. Euston Road will no longer be a barrier to pedestrian and cycle movement and onward journeys from the station. Euston has long been too polluted - the proposals in this plan will help to make it less so.

EAP Objectives:

1. Prioritising local people's needs:

To ensure that new development meets local needs by ensuring homes, jobs, businesses, schools, community facilities and open space lost or affected by HS2, should it go ahead, are reprovided in the Euston area.

2. Securing excellent design:

To work to ensure that any new station or development is of excellent design, easy to access, complements the character and heritage of the area, and helps to improve the image and function of the Euston.

3. Making the best use of new space above the station and tracks and opportunities for regeneration in the wider area:

To make sure any new development above the station and regeneration in the wider plan area provides a mix of homes, shops, jobs, open space, services, education and leisure facilities that benefits existing and future residents, businesses and visitors.

4. New streets above the station and tracks:

To create new green streets above and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building.

5. Boosting the local economy by reinforcing existing economic assets and businesses:

To provide new spaces for existing and new businesses and shops, and encourage new and innovative business sectors in the Euston area, such as knowledge or creative industries, and secure significant new job and training opportunities for local people.

6. Creating sustainable development:

To plan for carbon free sustainable development and a local low carbon energy network in Euston and enhance the quality and sustainability of the local environment.

7. Improving the environment along Euston Road:

To create new and improved crossing points across Euston Road and improve the pedestrian and cyclist experience through greening and measures to reduce air and noise pollution.

8. Promoting sustainable travel:

To promote walking and cycling in the area, through encouraging improvements to the streets and enhancing facilities for pedestrians and cyclists and those using the station, along with existing and new residents and workers in the area.

9. Enhancing existing public transport:

To encourage improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west.

10. Planning for future public transport:

To ensure that if a new station is developed, adequate improvements to the Underground services and new transport links, such as Crossrail 2, are provided to prevent congestion and overcrowding of the Underground trains.

3. METHODOLOGY

3.1 The appraisal

3.1.1 This report has been produced to meet the requirements for sustainability appraisal and strategic environmental assessment, as established in European and national legislation, regulations and guidance. The development of the SA approach for the Euston Area Plan is based on previous work undertaken by the LBC for the Camden Core Strategy, Development Policies and Site Allocations.

3.1.2 The Euston Area Plan SA Scoping Report provides a review of other relevant plans, programmes and sustainability objectives, a set of baseline characteristics of the area, and a number of key sustainability issues that the Euston Area Plan will need to address. This is used to provide an updated set of sustainability objectives and criteria (the **sustainability appraisal framework**) for use in the sustainability appraisal of the Euston Area Plan. These are set out in Section 6 of this report.

3.2 The Sustainability Appraisal Framework

3.2.1 The SA framework, which sets out the Council's sustainability objectives and criteria, has been the main tool used in the appraisal of the EAP at each stage.

3.2.2 The SA Scoping Report for the Euston Area Plan (January 2013) provides a review of other relevant plans, programmes and sustainability objectives (see Section 4.1 below), as well as setting out the baseline characteristics and key sustainability issues in the area (see Sections 4.2 and 4.3 below). These are used to identify key sustainability issues to be addressed in the Euston Area

Plan, which are provided in Section 6 of the Scoping Report. The sustainability objectives were devised within the Scoping Report and are set out in section 4.4 of this report.

- 3.2.3 The sustainability objectives formed the basis of the sustainability appraisal of the draft Euston Area Plan. The performance of the EAP Strategic Objectives and policies (including alternatives) was assessed against each sustainability objective. This enabled the sustainability effects and performance of the document to be described, analysed and compared.
- 3.2.4 A matrix was developed that included the sustainability objectives and columns for carrying out the appraisal of the various EAP Strategic Objectives and policies. Within the matrix, the effects are depicted by symbols (see table 3.1 below), and a commentary is provided to state the reasoning behind the appraisal and to identify any relevant mitigation measures that may be available. This matrix is consistent with the approach use in the SA of the Core Strategy and Development Policies.

++	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

- 3.2.5 An assessment of the draft Euston Area Plan was presented in the draft Sustainability Appraisal Report (July 2013). Following consultation on these draft documents, this Sustainability Appraisal Report has been produced, which assesses the objectives and policies within resulting Euston Area Plan.

3.3 The structure of the appraisal

- 3.3.1 The structure of the Euston Area Plan Sustainability Appraisal consists of three distinct sections:
1. An appraisal of the ‘Strategic Objectives’ which are the overriding objectives for the Euston Area Plan;
 2. An appraisal of the main strategic options that have been identified for the future approach to growth in the Euston area;
 3. An appraisal of the Euston Area Plan (including an assessment of alternatives where appropriate), which sets out the preferred way forward on the key issues for Euston’s future.
- 3.3.2 These appraisals are set out in Sections 5, 6 and 7 of this report. Before this, Section 4 sets out the policies that were reviewed, the baseline characteristics and key sustainability issues in the study area, and the sustainability objectives and criteria to be used in the appraisal process.

4. BASELINE, CONTEXT AND SUSTAINABILITY ISSUES AND OBJECTIVES

4.0.1 The SA Scoping Report for the Euston Area Plan reviews existing plans, programmes and sustainability objectives; sets out the existing baseline and key sustainability issues; and establishes the sustainability appraisal framework to be used in the appraisal process. This section summarises this context, and sets out the sustainability objectives that provide the framework for assessing the sustainability of the Area Plan.

4.1 Review of relevant plans programmes and sustainability objectives

4.1.1 Table 4.1 below lists the key plans, programmes and sustainability objectives that were reviewed in the early stages of the SA process. The full review is provided in Appendix 3 to the Scoping Report, along with an addendum (December 2013), which provides an updated review of additional plans, policies and programmes.

Table 4.1 Relevant plans, programmes and sustainability objectives

NATIONAL POLICY

“A Better Quality of Life”- A strategy for Sustainable Development in the UK (UK Govt 1999)
 The UK Sustainable Development Strategy: Securing the Future (UK Govt 2005)
 Sustainable Communities: Building for the Future (ODPM 2003)
 Sustainable Communities in London: Building for the Future (ODPM 2003)
 Sustainable Communities: Homes for All (ODPM 2005)
 The Code for Sustainable Homes: Setting the standard in sustainability for new homes
 The Code of Sustainable Homes: Technical Guide - 2010
 Climate Change: The UK Programme 2006 (UK Govt 2006)
 Department for Transport 10 Year Transport Plan (DETR 2000)
 Transport White Paper-The Future of Transport: A Network for 2030 (DoT 2004)
 Transport White Paper – Cutting carbon, creating growth: making sustainable local transport happen (2011)
 National Air Quality Strategy for England; Wales; Scotland and Northern Ireland:
 Working Together for Clean Air (DEFRA 2000 and updated 2003)
 The air quality strategy for England, Scotland, Wales and Northern Ireland (Volume 1, 2007, Volume 2, 2011)
 Energy White Paper-Our Energy Future, Creating a Low Carbon Economy (DTI 2003)
 Energy White Paper – Planning for our electric future (2012)
 Building a Greener Future – Towards Zero Carbon Development
 Waste Strategy for England (DEFRA 2007)
 Waste management plan for England (2013 -consultation)
 Urban White Paper – Our Towns and Cities: The Future (ODPM 2000)
 By Design: Urban Design in the Planning System -Towards Better Practice (ODPM and CABE 2000)
 Guidance on Tall Buildings (CABE and English Heritage 2007)
 Safer Places: The Planning System and Crime Prevention (Home Office/ODPM 2004)
 Building Research Establishment Environmental Assessment Method (BREEAM) / EcoHomes (BRE 2006)
 UK Biodiversity Action Plan 1994 (HMSO January 1994)
 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services
 UK Post 2010 Biodiversity Framework
 Working with the grain of nature: a biodiversity strategy for England (Defra 2002)
 Better Buildings Better Lives: Sustainable Buildings Task Group Report 2004
 Planning and Access for Disabled People: A Good Practice Guide (ODPM 2003)
 Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites

Planning policy for traveller sites 2012
 National Planning Policy Framework 2012
 Circular 05/2005: Planning Obligations (2005)
 New Policy document for planning obligations: consultation (2010)
 Thames Corridor Abstraction Management Strategy (Environment Agency, June 2004)
 Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11) (Environment Agency, September 2004)
 Thames Region Catchment Flood Management Plan (consultation document, Environment Agency, January 2007)
 Sustainable Drainage Systems – An Introduction (Environment Agency, May 2003)
 Bringing your rivers back to life – A Strategy for restoring rivers in North London (Environment Agency, February 2006)
 Understanding place: conservation area designation, appraisal and management (English Heritage March 2011)
 Transport and the historic environment (English Heritage, March 2004)
 Streets for All: A guide to the management of London's Streets (English Heritage, March 2000)
 Regeneration and the historic environment (English Heritage, January 2005)
 Guidance on the Setting of Heritage Assets (2011)
 Seeing History in the View (2011)
 Retail Development in Historic Areas (English Heritage, December 2005)
 Local green infrastructure: helping communities make the most of their landscape 2011
 High Speed Rail: Investing in Britain's Future Consultation (February 2011)
 High speed rail: Investing in Britain's future – the Government's decisions (January 2012)

LONDON – WIDE POLICY

The London Plan: Spatial Development Strategy for Greater London 2011
 Mayor's Transport Strategy (May 2010)
 Clearing the air: The Mayor's Air Quality Strategy (December 2010)
 Connecting with London's Nature: The Mayor's Biodiversity Strategy (GLA 2002)
 The Mayor's Economic Development Strategy for London (May 2010)
 Green light to clean power: The Mayor's Energy Strategy (GLA February 2004)
 Making business sense of waste: The Mayor's business waste strategy for London (November 2011)
 London's wasted resource: The Mayor's municipal waste management strategy
 Souder City: The Mayor's Ambient Noise Strategy (GLA March 2004)
 Cultural Metropolis: The Mayor's cultural strategy – 2012 and beyond (November 2010)
 Town centres draft Supplementary Planning Guidance 2013
 Accessible London: Achieving an inclusive environment (GLA 2004)

GLA – Housing Supplementary Planning Guidance (November, 2005)
 Housing: draft supplementary planning guidance (December 2011)
 GLA – Sustainable Design and Construction Supplementary Planning Guidance (November 2005)
 Industrial Capacity SPG (March, 2008)
 London Office Policy Review (GLA 2009)
 Shaping neighbourhoods – play and informal recreation SPG 2012
 Shaping neighbourhoods: character and context draft SPG 2013
 Geodiversity of London (draft), July 2008
 Planning and Equality and Diversity in London (October 2007)
 London View Management Framework SPG (March 2012)
 Mayors draft Climate Change Adaptation Strategy (2010)
 Environment Agency River Basin Management Plan, Thames River Basin District

(2009)

CAMDEN POLICY

The Camden Plan 2012-2017
 Camden Core Strategy 2010
 Camden Development Policies 2010
 Camden Site Allocations September 2013
 Camden Planning Guidance SPD (2011)
 Revised Planning Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses SPD (2007)
 Euston: A Framework for change SPD (2009)
 Bloomsbury - A Strategic Vision (Farrells)
 Regent's Park conservation area appraisal and management strategy 2011
 Bloomsbury conservation area appraisal and management strategy (April 2011)
 Camden Town conservation area appraisal and management strategy (October 2007)
 North London Strategic Flood Risk Management Plan (August 2008)
 Preliminary Flood Risk Assessment: Drain London - London Borough of Camden 2011
 Draft Camden Surface Water Flood Risk Management Plan
 London Borough of Camden Annual Monitoring Report – 2012/13
 Camden Housing Strategy 2011-2016
 Camden Housing Need Study Update 2008
 Camden Neighbourhood Renewal Strategy (LB Camden 2003)
 Camden Social Inclusion Strategy (LB Camden 2003)
 Tackling Inequality: Camden's Equality Scheme 2005-2008 and Action Plan (LB Camden 2005)
 Green Action for Change – Camden's environmental sustainability plan (2011-2020)
 Climate Change in Camden - A Joint Effort: Climate Change Action Plan 2006 – 2009 (LB Camden 2006)
 Action for a Sustainable Camden: Camden's Local Agenda 21 Plan (Camden 2001)
 Camden Air Quality Action Plan 2009-2012
 Camden Safe 2008-2011: Camden's Community Safety Partnership Strategy
 Creative and cultural industries in Camden: A research report and action plan
 Camden Transport Strategy (LIP) 2011-2031
 Camden's Noise Strategy (LB Camden 2002)
 The Camden Biodiversity Action Plan (LB Camden 2002)
 Camden's Corporate Sustainable Design and Construction Policy (LBC 2007)
 Building Schools for the Future – Indicative Strategy for Change Part 1 (LBC 2007)
 Camden's Children and Young People's Plan 2009-2012 (LBC 2006)
 An Open Space Strategy for Camden 2006-2011
 Camden Green Zones programme
 Camden Open Space, Sport and Recreation Study Review; Atkins; 2008
 Camden's Children and Young People's Plan 2009-2012
 Camden Statement of Licensing Policy 2011
 Let's Talk Rubbish – Camden Waste Strategy 2007-2010
 Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Review; 2007
 Camden Employment Land Review 2008
 Camden Retail Study 2008; Roger Tym and Partners

4.2 Baseline characteristics

4.2.1 Baseline information for the borough of Camden was established in the SA Scoping Report for the Camden LDF Core Strategy, Development Policies and Site Allocations. This information has been amended to provide more up-to-date and more Euston-specific baseline information, where available. The baseline information has been collected under a number of subtopics, which can be classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Annex 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows:

Environmental

- Transport and traffic (*air, human health, climatic factors*)
- Cultural heritage and landscape (*cultural heritage, landscape*)
- Open space (*landscape, human health*)
- Biodiversity, flora and fauna (*biodiversity, flora and fauna*)
- Air quality (*air, human health, climatic factors*)
- Soil (*soil, human health*)
- Water and flooding (*water, climatic factors*)
- Noise and vibration (*population, human health*)
- Climate factors (*energy use, sustainable construction, SUDS*)
- Recycling and waste management (*population, human health, water*)
- Development on previously developed land (*material assets, soil*)

Social

- Population (*population*)
- Health and community (*human health*)
- Deprivation and social exclusion (*population*)
- Education (*population*)
- Housing (*material assets, population*)
- Leisure (*human health*)

Economic

- Town centres and Employment

4.2.2 Under each of these subtopics, a number of baseline indicators have been identified. It is these indicators that have been used to describe the baseline situation and will be used to measure the performance of the Area Plan against the SA objectives. Table 4.2 below shows the indicators that describe the various elements of Camden's environment. These have been selected as it was considered that they provided a comprehensive picture of the borough (and, where possible, the Euston area) as it is now and would be able to be monitored in the future to measure the progress of the Area Plan in achieving sustainable development.

Table 4.2 Baseline Indicators

Environmental Indicators	
Transport and traffic	<ul style="list-style-type: none"> • Location of major transport demand generating developments • % reduction in number of people killed or seriously injured in road accidents • Distribution of local services throughout the borough • Number of agreements signed for car-free or car-

	<p>capped housing</p> <ul style="list-style-type: none"> • % Reduction in motor traffic flows through the borough • % increase in walking as share of modal split • % Increase in cycling as share of modal split • % Increase in bus passenger journeys
Cultural heritage and landscape	<ul style="list-style-type: none"> • Conservation areas • Listed buildings and other heritage assets at risk • Registered Parks and Gardens/ Designated London Squares • Protected viewing corridors • Impact on potential archaeological deposits • Number and condition of scheduled ancient monuments
Open space	<ul style="list-style-type: none"> • Open space deficiency • Area of designated open space /improvements to open space • Public opinion of open spaces in Camden • Number of Tree Preservation Orders (TPOs) served • Number of applications affecting trees protected by TPOs • Number of applications permitted that involved the loss of trees protected by TPOs
Biodiversity, flora and fauna	<ul style="list-style-type: none"> • Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation Importance and other sites of special biodiversity value, such as open spaces
Air quality	<ul style="list-style-type: none"> • Carbon dioxide (CO₂), Nitrogen dioxide (NO₂) and particulate matter (PM₁₀) emissions
Soil	<ul style="list-style-type: none"> • Number of sites of potential land contamination
Water and flooding	<ul style="list-style-type: none"> • % of new developments incorporating sustainable drainage measures • % new developments incorporating water conservation measures (e.g. rainwater harvesting and greywater recycling) • Number of planning permissions granted contrary to the advice of the Environment Agency on flooding or water quality • Number of properties at risk from 1% and 0.1% floods • Annual domestic water consumption by type: (a) potable; (b) other
Noise and vibration	<ul style="list-style-type: none"> • Number of noise complaints received by the Council • Increase/decrease in ambient noise levels (decibels)
Climate factors	<ul style="list-style-type: none"> • Proportion of energy generated from renewable and low carbon sources • Energy use and efficiency in existing buildings • Annual average domestic consumption of (a) natural gas; and (b) electricity • Number of new developments accompanied by a

	<p>BREEAM or EcoHomes assessment</p> <ul style="list-style-type: none"> • Number of new developments achieving BREEAM or Code for Sustainable Homes ratings of very good or excellent • %/Number of new developments incorporating water conservation measures (e.g. SUDS) • Public concern about the environment
Recycling and waste management	<ul style="list-style-type: none"> • % of households recycling • % of household waste recycled • % of new developments using sustainable construction • Annual household waste
Development on previously developed land	<ul style="list-style-type: none"> • % of new housing on previously developed land • % of vacant buildings
Socio-Economic Indicators	
Population	<ul style="list-style-type: none"> • Population by age and sex • Population by ethnic group • Population by place of birth • Population growth • Household size and composition • Household projections • Population density (persons/ha)
Health and community	<ul style="list-style-type: none"> • Schemes involving a gain/loss in community premises (museums, community halls, places of worship) • Provision of health facilities by type per 1000 population • Distance of households from GPs and hospitals • % people describing their health as 'good' or 'not good' • % people with limiting long term illness • Perception of factors impacting on health • Number of GPs or primary care professionals in Camden • Access to GP per 1000 population • Number of hostels and care homes • Number of sports/playing fields and outdoor recreation spaces • Levels of crime – recorded crime per 1000 population by type of crime • Fear of crime and perceptions of crime • % of developments incorporating Secured by Design principles
Deprivation and social exclusion	<ul style="list-style-type: none"> • Household income • Number of Super Output Areas (SOAs) within 10% most deprived in England • Deprivation by ward • Life expectancy • Mortality • % of unemployed who have been out of work for over one year • Claimant count unemployment rate • Unemployment by ward and sex

	<ul style="list-style-type: none"> Households with children in families on Key Benefits
Education	<ul style="list-style-type: none"> Area of new education facilities created Indices of deprivation – education skills and training Proportion of adults with poor literacy and numeracy skills School capacity figures and areas of education provision deficiency
Housing	<ul style="list-style-type: none"> Housing and affordable housing % of dwellings by type Household size – number of people living in a property Household composition Ratio of average house price to gross household income Housing stock by tenure House prices and Council tax Number of overcrowded households Number of homeless households Condition of housing stock – unfit dwellings by tenure Additional home provision – new home completions Number of affordable housing completions %/Number of all new housing units designed to wheelchair accessibility Net change in Lifetime Homes standards % of residential floorspace in mixed use schemes Mix of housing sizes Compliance with regional housing targets Housing density - % of new dwellings completed at: <ul style="list-style-type: none"> Less than 30 dwellings/ha Between 30 and 50 dwellings/ha Above 50 dwellings/ha % of vacant residential units
Leisure	<ul style="list-style-type: none"> Completed leisure (D2) floorspace Completed leisure (D2) floorspace in Central London Frontages, town centres and neighbourhood centres Access to open space
Town Centres and Employment	<ul style="list-style-type: none"> Town centre health A – comparison and convenience retail draw Town centre health B – centre hierarchy Town centre health C – retail capacity assessment and growth Completed retail, office and leisure floorspace (net) in designated centres (Central London Frontages, town centres and neighbourhood centres) % of ground floor vacant floorspace in primary shopping frontages (Central London Frontages, town centres and neighbourhood centres)

	<ul style="list-style-type: none"> • Completed retail and financial services offices floorspace • Number and location of A3/A4/A5 completions • Total number of mixed use developments completed • Net changes in Use Classes by floorspace (sq m) • Changes in vacant employment land • Composition of businesses operating in Camden • Economic activity of the population of Camden • Occupation of those currently in employment by industry
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4.2.3 Appendix 4 to the SA Scoping Report for the Euston Area Plan sets out the detailed baseline for the Euston Area Plan. It updates the baseline information provided in the 2008 LDF SA Scoping Report, providing more recent or Euston-specific information where available.

4.3 Key sustainability issues

4.3.1 Building on the review of plans, programmes and sustainability objectives and the baseline information, the SA Scoping Report for the Euston Area Plan identifies key sustainability issues that the Plan will need to address. The key issues for the area are highlighted in the Scoping Report, and are set out in table 4.3 below.

Table 4.3 Sustainability issues for the Euston Area Plan to address

Issue	Summary and Source of Evidence
Environmental	
Protecting the historic environment	There are parts of 3 conservation areas within the Area Plan boundary, along with a number of listed buildings and undesignated heritage assets that have been identified in the Euston Historic Area Assessment, including the Drummond Street area, St James's Gardens and part of Somers Town. The Area Plan area is not covered by any of Camden's Archaeological Priority Zones. There are also many heritage assets in areas adjacent to the Area Plan boundary some of which could be affected by development in the area. The settings of heritage assets could also be affected. A number of listed buildings and heritage assets are close to/within the HS2 construction area.
Promoting energy efficiency and renewable energy.	There is a nationally recognised need to increase the energy efficiency of new and existing buildings and install more renewable energy facilities on new and existing buildings (<i>NPPF</i>). Decentralised energy is identified in the report <i>Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050</i> as a key means to achieving carbon reduction targets, and studies indicate the strong potential for a decentralised energy network on the Euston Road corridor.
Significant travel-demand generating uses, including new housing, need to be located in	Core Strategy policy CS1 guides significant travel generating developments towards areas with high public transport accessibility.

Issue	Summary and Source of Evidence
<p>areas with high public transport accessibility and local services.</p>	<p>Almost all of the Euston Area Plan area has an excellent public transport accessibility (PTAL of 6a/6b), apart from a limited area to the west around Regent's Park Barracks, which has moderate accessibility (PTAL of 3). (Camden Transport team).</p> <p>HS2 may exacerbate transport capacity issues in the Euston area due to the extra demand created by additional passenger numbers.</p>
<p>There is a deficiency of open space in the borough in terms of accessibility of high quality usable open spaces and parks.</p>	<p>There are relatively few open spaces in the area west of Euston Station. However Regents Park is nearby, providing residents of the sub area with easy access to a Metropolitan Park, which provides a range of informal and formal recreational facilities. Anecdotal evidence suggests that despite its proximity Regents Park is not well used by the community for amenity. Areas to the east of the Regent's Park area; and to the south west of the Somers Town area are deficient in terms of access to play space.</p> <p>Two thirds of St James's Gardens and half of Hampstead Road open space would be lost due to HS2 as a result of the proposed expanded Euston Station footprint.</p>
<p>Need to effectively recycle and manage waste.</p>	<p>The population of the borough will increase considerably over the next ten years, increasing the need for our waste to be sustainably managed. This is also true in the Area Plan area, where future growth is likely. <i>Camden's Waste Strategy</i> highlights the importance of this, as does <i>Camden Core Strategy CS18</i>.</p>
<p>Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter.</p>	<p>The whole of Camden has been designated as an Air Quality Management Area due to air pollution issues in the borough (<i>Camden's Air Quality Action Plan</i>). Camden's Transport Strategy (2011) explains that air pollution issues are particularly acute in the area around Euston Road due to high levels of traffic and related emissions.</p> <p>Camden Core Strategy policy CS16 states that Camden will recognise the impact of poor air quality on health and implement Camden's Air Quality Action Plan which aims to reduce air pollution levels. Ensuring that future developments do not have a significant impact on air quality in Camden is important, making sure that exposure to poor air quality is minimised at new development sites.</p>
<p>Encouraging new development on previously developed sites raises potential concern regarding contaminated land and could have biodiversity issues.</p>	<p>While no sites in the Euston area are currently designated as contaminated for the purposes of the Environment Act, polluting uses may have taken place on specific sites which may pose contamination problems for future development on such sites, especially given the trend for building on previously developed land (<i>AMR 2009/10</i>).</p>

Issue	Summary and Source of Evidence
	Further, many vacant sites have become havens for urban wildlife, in areas where very little other habitat exists.
Increases in the amount of built land can cause flooding problems in parts of Camden.	The Euston Area Plan area does not fall within Flood Zones 2, 3a and 3b. However it is within a critical drainage area as identified in the Camden Surface Water Management Plan. Further mapping has shown that areas within the Area Plan area are at risk of flooding so surface water management needs to be considered in new development.
There is a strong connection between traffic flows and ambient noise levels.	Studies undertaken on European Car-Free Day in 2002 have shown that ambient noise levels were significantly reduced, particularly on Great Russell Street and Woburn Square, which are important east-west links with high traffic flows normally (<i>European Car-Free Day 22/9/02 Results of noise monitoring in Bloomsbury</i>). Euston Road is identified by DEFRA as a first priority location for noise action planning, which places it as one of the noisiest roads in the country.
There should be no further decline in priority species and we need to seek ways to protect and enhance/increase their habitats.	There are five priority species identified within Camden's biodiversity Action Plan, being the bat, hedgehog, house sparrow, odanata (dragon flies and damsel flies) and stag beetle. There has been an increase in the amount of priority habitat in Camden in recent years. A total of 428.8 ha of land is now classed as having biodiversity importance, compared to 412.8 ha in 2006/7 (Camden annual Monitoring Reports 2006/07 and 2010/11). The Euston area includes one Site of Importance for Nature Conservation (St James's Gardens) as well as numerous species records for the area. Camden Development Policy DP22 and supporting text highlights the potential for green and brown roofs and sustainable urban drainage systems for new and redeveloped buildings, thereby helping to increase biodiversity potential. Habitats could potentially be affected by the proposed HS2 terminus at Euston Station.
Sustainable design and use of resources	The review of plans and programmes highlights a prevailing emphasis on improving design standards, building performance and energy efficiency (<i>CLG/BREEAM/GLA</i>). Improvements in building design will promote energy conservation and efficiency resulting in reduced energy consumption. This will assist in reducing air pollution and carbon dioxide emissions from generating power for heating and electricity.
Social	
Meeting the needs of an growing population	Camden's population is highly mobile, culturally and ethnically diverse. Projections from revised census estimates both for Camden as a whole and the Euston Area Plan area indicate high levels of growth and emphasise the comparative youthfulness of local population and large number

Issue	Summary and Source of Evidence
	<p>of single person households (<i>Census/ONS</i>). A significant population increase is anticipated in Regent's Park and Somers Town and St Pancras Wards to 2026 due to the large development sites in the area.</p>
Meeting increased housing needs particularly provision of affording housing	<p>Housing is established as Camden's priority land use due to the significant need for new housing in the borough.</p> <p>In 2010/11, 142 affordable dwellings were completed in Camden. The majority of all affordable completions were from schemes with more than 50 housing units (70%), emphasising the importance of larger schemes in delivering affordable housing. Camden Development Policy DP5 highlights the need for more new large affordable homes.</p> <p>At least 216 (mainly social rented) homes would be result due to HS2 as a result of the proposed expanded Euston Station footprint, with additional homes potentially at risk due to their proximity to the construction site.</p>
Poor housing conditions and overcrowding, particularly in Central and Southern wards	<p>11.9% of housing stock in Camden is deemed unfit (<i>London Divided, GLA 2002</i>). The Census occupancy rating calculates that 30% of households have fewer rooms than are required by their inhabitants and are overcrowded (<i>ONS</i>). Camden's 2008 Housing Needs Assessment identified 5,540 overcrowded households in the borough- 5.7% of all households. This indicates a continuing need for new and improved housing in the borough.</p>
Deprivation and Social exclusion	<p>Camden's mean annual household income of £39,040 is higher than the Greater London average of £37,661 and well above the Great Britain average of £32,353 (see fig 1, fig 6) (<i>CACI Ltd PayCheck</i>).</p> <p>However, the Euston Area Plan area includes a number of super output areas that are within the 20% most deprived in the country (<i>Indices of Deprivation 2010</i>). Deprivation is a significant issue in the Euston Area Plan area.</p>
Health inequalities and access to facilities	<p>Health deprivation and disability are major factors in Camden's overall deprivation ranking in the <i>Indices of Multiple Deprivation 2010</i>, and a significant issue in the Euston Area Plan area, where two out of 12 super output areas are within the 10% most health deprived in the country, and 7 out of 12 are within the 20% most health deprived. A higher proportion of residents in the Euston Area Plan area have a limiting long-term illness than the average for Camden and Greater London, with fewer people than the Camden average describing their health as 'good' (<i>Census 2001</i>).</p> <p>Access to public open space can also impact upon health as green space can have positive therapeutic effects on human mental and physical</p>

Issue	Summary and Source of Evidence
<p>Planning for school provision is difficult given that children from outside the borough can attend Camden's schools and Camden children can attend schools outside the borough</p>	<p>health.</p> <p>Population projections at the borough level suggest a growing secondary age population, whilst in the St Pancras and Somers Town and Regent's Park wards, extensive housing development is likely to lead to a marked increase in demand for school places in the area (Camden Children, Schools and Families school projections information).</p>
<p>There is a need to increase opportunities for education, including further education and adult learning in the borough, particularly in areas of deprivation.</p>	<p>The redevelopment of Netley School will provide a new and improved campus for learning. Growth in the Euston and King's Cross areas will generate demand for additional school places/ facilities (source: Camden Children, Schools and Families). The viability of Maria Fidelis lower school site (on North Gower Street) could be put at risk by HS2 due to its proximity to the Euston Station construction site. (source: Camden Children, Schools and Families)</p>
<p>Reduce levels of crime and fear of crime</p>	<p>Despite the reduction in recorded crime in Camden, local rates relating to drugs offences, burglary, robbery and violence against the person remain significant across the borough. Though crime (in its various forms and impacts) consistently appears as a priority issue for residents and businesses (<i>The Camden Crime and Disorder Audit 2004 and Strategy 2005, Safer Camden 2004</i>).</p> <p>In 2010, one Super Output Area in the study area was within the 5% most deprived in the country in terms of crime and disorder. This area is located immediately west of Euston Station (LSOA E01000948).</p> <p>Camden Town, to the north of the study area, is identified as a particular crime "hotspot" (<i>Local Community safety strategy, audits and police data</i>).</p>
Economic	
<p>Unemployment and Job Opportunities for local people</p>	<p>Camden's unemployment rate has been falling since 2002 and is positioned mid-way between the averages for inner London (6%) and Greater London (4.6%).</p> <p>In 2010, one out of twelve super output areas in the Euston Area Plan area was within the 15% most deprived in relation to employment, and 4 super output areas were within the 20% most deprived.</p> <p>Approximately 20 business premises would be lost as a result of HS2 in the Euston area. However an Economic visioning report produced by GVA indicates that there is longer term potential for economic growth at Euston with opportunities to ensure local people benefit from future jobs.</p>
<p>Need to support development in existing centres and ensure the health of town centres.</p>	<p><i>Camden's Retail 'Health Check' Study</i> of the borough suggests that its retail centres continue to be of vital importance to its local people and wider London. The Camden Core Strategy promotes</p>

Issue	Summary and Source of Evidence
	<p>significant retail growth at Camden Town and Euston, as well as King's Cross.</p> <p>Vacancy rates in Camden's centres have either remained static or slightly increased. Euston Road Central London Frontage remains static. Drummond Street and Eversholt Street have remained static, whilst Chalton Street vacancies have increased markedly (Camden annual retail surveys).</p>
<p>Balancing conflict between opposing land uses, in particular housing needs with the protection of employment land</p>	<p>AMR data suggests land use pressures and conflicts between uses, particularly the demand for housing development over all other land uses and the potential threat this creates for employment generating land uses.</p> <p>The London Plan and Core Strategy include targets for new homes and employment provision in the Euston growth area. The Camden Core Strategy also sets out Camden's approach to managing proposals for land uses and their impacts, and for managing competing demands on land in the Central London area.</p>
<p>The need to manage redevelopment impacts.</p>	<p>As with Kings Cross, Euston is a key regeneration area in the borough and, with the emergence of the proposed HS2 terminus, has London-wide significance. It will be important that regeneration objectives can contribute to the borough's needs and ensure that the adverse impacts are avoided or at least mitigated. Camden's Core Strategy and Development Policies highlight the impacts that different kinds of development can have on specific areas and the measures that can be taken to addressing them.</p>

4.4 The Sustainability Appraisal Framework

- 4.4.1 The SA Scoping Report established the appraisal framework for the sustainability appraisal of the Euston Area Plan. A set of updated sustainability appraisal objectives were produced, taking into account the revised assessment of relevant plans, policies and sustainability objectives, current baseline information and the key sustainability issues identified for the Euston area. It updates the appraisal framework for the Camden Core Strategy, Development Policies and Site allocations, taking into account changes over time and Euston-specific circumstances.
- 4.4.2 The following set of 16 SA objectives, set out in the SA Scoping Report, provide the framework for assessing the sustainability of the Euston Area Plan.

Table 4.4 Sustainability Appraisal objectives

	Objective
1	To promote the provision of a range of high quality and affordable housing to meet local needs
2	To promote a healthy and safe community
3	To ensure access to local shopping, community, leisure facilities and access to and enhancement of open space
4	To tackle poverty and social exclusion
5	To encourage and accommodate sustainable economic growth and employment opportunity
6	To maximise the benefits of regeneration and development to promote sustainable communities
7	To promote high quality and sustainable urban design which protects and enhances the historic environment
8	To ensure new development makes efficient use of land, buildings and infrastructure
9	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area
10	To improve amenity by minimising the impacts associated with noise
11	To protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible
13	To reduce the amount of waste requiring final disposal
14	To improve air quality
15	To provide for the efficient use of energy in order to mitigate and adapt to the potential impacts of climate change
16	To minimise the use of fossil fuels, aggregates and non-renewable resources

- 4.4.3 Each of the above objectives is supported by a number of criteria to assist the assessment of potential impacts. A full list of the criteria and potential indicators relative to each objective is provided at Appendix B

5. TESTING EUSTON AREA PLAN OBJECTIVES AGAINST THE SA FRAMEWORK

5.0.1 A series of draft objectives for the Euston Area Plan were developed to deliver the vision for Euston and to guide the change in the area and these formed the basis of public consultation in November/December 2012. The objectives have been refined to reflect the results of the SA process. The vision and objectives as they appear in the draft EAP are set out below.

1. **Prioritising local people's needs:** To ensure that new development meets local needs by ensuring homes, jobs, businesses, schools, community facilities and open space lost or affected by HS2, should it go ahead, are reprovided in the Euston area.
2. **Securing excellent design:** To work to ensure that any new station or development is of excellent design, easy to access, complements the character and heritage of the area, and helps to improve the image and function of the Euston.
3. **Making the best use of new space above the station and tracks and opportunities for regeneration in the wider area:** To make sure any new development above the station and regeneration in the wider plan area provides a mix of homes, shops, jobs, open space, services, education and leisure facilities that benefits existing and future residents, businesses and visitors.
4. **New streets above the station and tracks:** To create new green streets above and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building.
5. **Boosting the local economy by reinforcing existing economic assets and businesses:** To provide new spaces for existing and new businesses and shops, and encourage new and innovative business sectors in the Euston area, such as knowledge or creative industries, and secure significant new job and training opportunities for local people.
6. **Creating sustainable development:** To plan for carbon free sustainable development and a local low carbon energy network in Euston and enhance the quality and sustainability of the local environment.
7. **Improving the environment along Euston Road:** To create new and improved crossing points across Euston Road and improve the pedestrian and cyclist experience through greening and measures to reduce air and noise pollution.
8. **Promoting sustainable travel:** To promote walking and cycling in the area, through encouraging improvements to the streets and enhancing facilities for pedestrians and cyclists and those using the station, along with existing and new residents and workers in the area.
9. **Enhancing existing public transport:** To encourage improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west.
10. **Planning for future public transport:** To ensure that if a new station is developed, adequate improvements to the Underground services and new transport links, such as Crossrail 2, are provided to prevent congestion and overcrowding of the Underground trains.

5.1 SUMMARY OF FINDINGS

5.1.1 A detailed SA of the Strategic Objectives is contained within Appendix C. The key outcomes and findings are contained within the following paragraphs.

5.1.2 Overall, it is considered that the draft strategic objectives are successful in seeking to achieve sustainable development. Where appropriate, in response to the recommendations of the draft Sustainability Appraisal, the objectives have been amended to expand their coverage, and therefore address the main elements of sustainability and contribute positively towards achieving this. There are not considered to be any significant conflicts between the DPD objectives and the sustainability framework, nor have any internal conflicts between DPD objectives been identified. There are some instances where care will need to be taken to ensure that one objective does not outweigh or preclude achievement of another objective. However, this is not unusual and is considered to be a reasonable part of the balancing act required to meet a range of aims within one document.

Social Impacts

5.1.3 The strategic objectives will have considerable positive social impacts. There are several objectives that aim to address key social issues including

- mitigating the loss of homes, jobs and open space and impact on schools and facilities that would result from HS2;
- addressing the negative social impact of the existing station site and seeking opportunities to provide new homes, jobs, community and other facilities and open spaces (above the station site);
- seeking to ensure that local people are included in employment opportunities, as well as potentially providing new shops that could be accessed by local people;

5.1.4 In addition to these direct positive impacts, there are a number of draft objectives that will indirectly affect social elements of sustainable development. For example, improving connectivity by seeking new streets above the station and tracks would significantly enhance accessibility for local people to local facilities and opportunities by. The promotion of sustainable travel would help to promote healthy lifestyles, improve access to facilities, and to employment opportunities.

5.1.5 Following the initial sustainability appraisal process, objective 1 has been amended to refer to re-provision of other community uses (other than schools and open space) that would be affected by HS2. In addition, objective 3 has been amended to address the potential to deliver regeneration across the whole study area.

Environmental Impacts

5.1.6 From the appraisal, it is clear that the draft objectives will contribute significantly to achieving the environmental aims of the sustainability framework. Direct positive impacts include:

- Seeking the re-provision of open spaces lost as a result of HS2;
- Making better use of land above the station would make efficient use of land and promote mixed use development in an area of excellent public transport accessibility,
- New streets above the station and an improved environment along Euston Road would help to promote walking and cycling, and deliver an improved local environment

- A dedicated objective regarding creating sustainable development would help to seek high environmental standards in new development
- Objectives to promote sustainable travel, improve existing public transport, and planning for future public transport would help to promote more environmentally sustainable alternatives to private transport, particularly in relation to carbon emissions and air quality.

5.1.7 In addition to these direct positive impacts, there are a number of draft objectives that will indirectly affect social elements of sustainable development.

- Securing excellent design could lead to the creation of an improved local environment/ public realm;
- Making better use of land above the station could help to enable significant design improvements compared to existing buildings on the site, creating a more attractive, vibrant environment. This objective could also help to create the potential for a decentralised energy network.

5.1.8 Objective 6 has been widened in scope to refer to enhancing the quality and sustainability of the local environment (as well as energy/ carbon related issues), in order to address and support detailed policies concerning wider environmental issues such as surface water flooding, air quality and biodiversity.

Economic Impacts

5.1.9 Overall the draft strategic objectives will have very positive economic impacts both directly and indirectly. There are several objectives that will specifically contribute to achieving economic sustainability:

- A dedicated policy on providing jobs and boosting the local economy would be likely to have a strongly positive economic impact, by seeking to address local economic issues and opportunities, whilst also focusing on the potential to take advantage of surrounding knowledge/creative clusters: this could have significant benefits for London and, possibly, nationally
- By prioritising local people needs, an emphasis is placed on the re-provision of jobs and business premises lost as a result of HS2, with benefits to the local economy;
- Making best use of space above the station and tracks could bring major economic benefits by promoting economic growth in a competitive Central London location, generating significant investment and providing a substantial number of new jobs.
- The promotion of sustainable travel, enhancing existing and planning for future public transport would have positive economic impacts by improving accessibility to employment/ economic activities, delivering the additional infrastructure required to support additional businesses and other uses, and helping to create a more attractive, less traffic-dominated environment.

5.1.10 There are other draft strategic objectives that will have indirect but strongly positive economic impacts:

- Securing excellent design would help to create a more appealing urban environment, helping to create vibrant places helping to attract business, visitors and investment. This is particularly important in the Euston area, where its competitive location is currently compromised by the quality of the environment and buildings

- Providing new streets above the station and tracks could bring strongly positive economic impacts by enhancing access to economic opportunities. This would generate significantly increased investment through creating a more attractive environment; and providing an urban framework for the provision of economic uses, as part of a mix of uses.
- Improving the environment along Euston Road would have a strongly positive economic impact by enhancing the image, attractiveness and function of the area, thus potentially attracting investment and jobs

5.1.11 Detailed policies then address the relationship between transport provision and economic growth/ development, and support environmental improvements such as the redevelopment of the Euston Station forecourt area.

5.2 Conclusions

5.2.1 The Euston Area Plan objectives (and their implementation through detailed policies) are considered to be successful in seeking to achieve sustainable development, and subsequently provide a positive framework for the detailed strategic Principles and Development Principles in the Euston Area Plan. The recommendations of the draft Sustainability Appraisal suggested minor amendments to the objectives, which have been incorporated to help widen the scope of the objectives to address relevant social, economic and environmental issues.

5.2.2 It is important that the policies contained within the Euston Area Plan help to implement the objectives, building on their success in seeking to achieve sustainable development. Appraisals of the strategic options considered in the development of the EAP and the Strategic Principles and Development Principles it contains within the EAP itself, are set out in Sections 6 and 7 below.

6. APPRAISAL OF THE EUSTON AREA PLAN STRATEGIC OPTIONS

6.0.1 In addition to the Strategic Objectives, a series of options have been identified to deal with the sustainability issues faced at Euston. These options are set out below. The matrix and accompanying commentary sets out the Sustainability Appraisal of these options and provides a justification for the appraisal.

6.1 Issue 1. Whether to produce an Area Action Plan for Euston

- Option 1a: Implement Core strategy, Development Policies and Site allocations without Euston Area Plan
- Option 1b: Euston Area Plan in addition to Core Strategy, Development Policies and Site Allocations

Sustainability Objectives	Options	1a	1b
1. To promote the provision of a range of high quality and affordable housing to meet local needs		+	++
2. To promote a healthy and safe community		-	+
3. To ensure access to local shopping, community, leisure facilities and access to and enhancement of open space		-	++
4. To tackle poverty and social exclusion		0	+
5. To encourage and accommodate sustainable economic growth and employment opportunity		+	++
6. To maximise the benefits of regeneration and development to promote sustainable communities		+	++
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		+	++
8. To ensure new development makes efficient use of land, buildings and infrastructure		+	+
9. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+	++
10. To improve amenity by minimising the impacts associated with noise		0	+
11. To protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change		+	++
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		+	++
13. To reduce the amount of waste requiring final disposal		+	0
14. To improve air quality		+	++
15. To provide for the efficient use of energy in order to mitigate and adapt to the potential impacts of climate change		+	++
16. To minimise the use of fossil fuels, aggregates and non-renewable resources		+	+

Commentary - Options 1a and b

6.1.1 Option 1a – manage change without a Euston Area Plan - has less positive impacts than Option 1b – production of a Euston Area Plan on most objectives. This is because whilst existing policies and site allocations would help to address most sustainability objectives, as borough-wide documents they would not make the best of opportunities to address the specific issues

and opportunities at Euston. For example, the loss of or impact on community facilities and open spaces as a result of HS2, and the potential community safety issues raised by a new station could mean that these issues could get worse without the production of the EAP. However, the production of a Euston Area Plan could seek to set out how lost open spaces and other community facilities could be re-provided, and how station design could seek to improve the existing situation in relation to community safety.

6.1.2 Whilst existing policies and allocations could be used to promote new housing, economic growth and environmental issues, they would not cover how these could be addressed in a comprehensive and integrated way at Euston. On the other hand, a Euston Area Plan provides the potential to guide more closely how additional homes and employment uses could be delivered across the Euston area, in addition to those sites identified in the Core Strategy and Site Allocations. The EAP also provides the potential to consider in more detail how the transport and onward movement issues faced at Euston could be addressed.

6.2 Issue 2. Approach to level of growth

- Option 2a: Growth according to Core Strategy figures
- Option 2b: Additional growth to Core Strategy figures

Sustainability Objectives	Options	
	2a	2b
1. To promote the provision of a range of high quality and affordable housing to meet local needs	+	++
2. To promote a healthy and safe community	0	0
3. To ensure access to local shopping, community, leisure facilities and open space	+	+?
4. To tackle poverty, social exclusion and promote equal opportunities	+	++
5. To encourage and accommodate sustainable economic growth and employment opportunities	+	++
6. To maximise the benefits of regeneration and development to promote sustainable communities	+	++
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	0	0
8. To ensure new development makes efficient use of land, buildings and infrastructure	+	++
9. To reduce reliance on private motorised transport	+	++
10. To improve amenity by minimising the impacts associated with noise	0	0
11. To protect and manage water resources and reduce flood risk	0	?
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	+	+?
13. To reduce the amount of waste requiring final disposal	-	-
14. To improve air quality	0	0
15. To provide for the efficient use of energy.	+	++
16. To minimise the use of non-renewable resources	-	-

Commentary - options 2a and b

- 6.2.1 Growth according to Core Strategy figures for the Euston growth area would help to deliver additional homes and employment/ economic uses, promoting development in an area that is appropriate for high density building and with predominantly excellent public transport links. However, it may not present the optimum opportunities for additional housing and employment growth compared to a Euston Area Plan, which could look more closely at additional growth potential in the wider Euston area.
- 6.2.2 Both growth options may generate negative outcomes in relation to waste and use of non-renewable resources given the potential impacts of construction. Policies to address these issues where possible in the Euston Area Plan may help to mitigate these impacts.

6.3 Issue 3. Approach to location of growth

- Option 3a: Focus new development in the Euston growth area
- Option 3b: Provide for new development across the Euston Area Plan area as well as major growth in the defined growth area.

Sustainability Objectives	Options	
	3a	3b
1. To promote the provision of a range of high quality and affordable housing to meet local needs	+	++
2. To promote a healthy and safe community	0	+
3. To ensure access to local shopping, community, leisure facilities and open space	+	++
4. To tackle poverty, social exclusion and promote equal opportunities	+	++
5. To encourage and accommodate sustainable economic growth and employment opportunities	+	++
6. To maximise the benefits of regeneration and development to promote sustainable communities	+	++
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		
8. To ensure new development makes efficient use of land, buildings and infrastructure	+	++
9. To reduce reliance on private motorised transport	++	+
10. To improve amenity by minimising the impacts associated with noise	0	+
11. To protect and manage water resources and reduce flood risk	+	+
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	?+	?+
13. To reduce the amount of waste requiring final disposal	0	0
14. To improve air quality	0	0
15. To provide for the efficient use of energy.	+	++
16. To minimise the use of non-renewable resources	0	0

Commentary - options 3a and b

- 6.3.1 Option 3a would help to deliver new homes and growth in the Euston Growth area, but would fail to take advantage of potential development sites outside

of the Euston area, which would be achieved under option 3b. In addition, option 3a would not provide the potential benefits of option 3b in providing a framework for growth to address issues outside of the growth area, such as community safety, access to community facilities and open space, and promoting the efficient use of energy through local energy networks.

6.4 Issue 4. Station design and development strategy options

- Option 4a: maximised decking/ OSD masterplan (lowered station platforms and tracks)
- Option 4b: HS2 Option B1 EAP response masterplan
- Option 4c: HS2 Option 8 EAP response masterplan
- Option 4d: Existing station footprint masterplan

Option 4a: maximised decking/ OSD masterplan (lowered station platforms and tracks)



Option 4b: HS2 Option B1 EAP initial response masterplan



Option 4c: HS2 Option 8 - EAP response



Option 4d Existing station footprint



Sustainability Objectives	Options	4a	4b	4c	4d
	1. To promote the provision of a range of high quality and affordable housing to meet local needs		++	+	+?
2. To promote a healthy and safe community		++	+	+?	+?
3. To ensure access to local shopping, community, leisure facilities and open space		++	+	+ -	+ -
4. To tackle poverty, social exclusion and promote equal opportunities		++	+	+?	+?
5. To encourage and accommodate sustainable economic growth and employment opportunities		++	+	+?	+
6. To maximise the benefits of regeneration and development to promote sustainable communities		++	+	-	+ -
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		++	+	+ -	+ -
8. To ensure new development makes efficient use of land, buildings and infrastructure		++	+	+ -	+ -
9. To reduce reliance on private motorised transport		++	+	+	+
10. To improve amenity by minimising the impacts associated with noise		++	+?	-	-
11. To protect and manage water resources and reduce flood risk		+?	+?	+ -	+ -
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		++	+	-	-
13. To reduce the amount of waste requiring final disposal		-	-	+	+
14. To improve air quality		++	+	+ -	+ -
15. To provide for the efficient use of energy.		++	+	?	?
16. To minimise the use of non-renewable resources		+	+	+	+

Commentary - options 4a – 4d

- 6.4.1 Option 4a: this option is the EAP preferred masterplan approach developed until March 2013. Option 4a would involve the provision of platforms and tracks at sub-surface level and would allow the creation of development set around ground level streets and public realm. It would offer strong sustainability benefits by enabling significant development above Euston Station, including the provision of new homes, employment uses, shops and facilities as well as a significantly improved public realm. It would also make the most of opportunities to transform north-south and east-west permeability within a high quality, comprehensively planned street pattern. However it should be noted that engineering and viability constraints have not fully been determined for this option, and this masterplan may not be entirely deliverable in the form shown.
- 6.4.2 Option 4b is based on the HS2 baseline scheme as at January 2013, and was also based on lowered platforms and tracks, but responds to station design proposals and constraints identified by HS2 that could affect the delivery of a masterplan for Euston. This option could still provide a range of benefits as it would still allow the provision of mixed use development based around ground-level streets above the sub surface Euston Station. It would also provide for a large number of homes and jobs, although less than that provided under option 4a. It would enable the creation of new east-west streets and the potential for a north-south link at ground level, although not to the

same extent as option 4a. The development is reconciled with the HS2 station design constraints identified therefore is more likely to be deliverable.

- 6.4.3 Masterplan option 4c is based around the HS2 current 'Option 8' station design included in the HS2 Hybrid Bill Environmental Statement. The design involves the introduction of new HS2 platforms and tracks next to retained existing Network Rail platforms and tracks. Two key issues raised by this approach are that (i) the existing tracks, which block east-west movement, would be retained; and (ii) depending on the approach taken to delivery it may be challenging to ensure the delivery of a comprehensive, properly integrated station and above station development. Whilst there would appear to be the potential for new economic uses and homes to be provided above the station, the environment in which they would be located, their detailed design and therefore the quality delivered, is not yet determined and it may not be possible to provide street addresses for all properties. This may reduce potential benefits, and housing is particularly sensitive to issues around quality of environment and availability of adequate street-level building access. Furthermore, this option does not allow for new streets above the station site at ground floor level, and development would be located above the station building at first floor level and on upper levels above a service deck: this could have negative implications for the quality of the built environment and uses provided, including the quality of any housing, as well as failing to address the current barrier effect of Euston Station to east-west movement. While there may be the potential for raised east-west connections, which are shown in the EAP, it is not yet certain whether these can be delivered, and as to whether it would be possible to provide these in a high quality environment. There are also uncertainties around the (re)provision of the service deck, which would have significant implications for development quanta and environmental/ architectural quality. Option 4c would therefore not make the most of opportunities to maximise the benefits or regeneration and development. However, whilst this option performs poorest overall in sustainability terms, it should be noted that it may deliver benefits by minimising resource use and reducing landfill, through the retention of the existing Euston Station platforms and tracks.
- 6.4.5 Option 4d is based around the delivery of Euston Station on its existing footprint. This could be delivered either if HS2 was delivered in a 'double deck', with ground floor and sub-surface platforms and tracks, or in a non-HS2 station redevelopment scenario. A potential benefit of this scenario would be that mitigation requirements for the loss of homes, business premises and open spaces may not be required, or may be reduced, because the station footprint would not be expanded into surrounding communities to the west. This option would be likely to be subject to some of the same issues as Option 4c, in that the operational requirements of Network Rail would make it challenging to completely rebuild the platforms and tracks at a sub surface level and therefore it is more likely that they will be retained largely at the current level. Again, the inability to secure ground level streets (and therefore street addresses for some buildings) may impact the quality of the environment for homes and businesses and also reduce the opportunities for the station to be more fully integrated and connect to surrounding communities.
- 6.4.6 The HS2 Hybrid Bill and accompanying Environmental Statement have been drafted on the basis of option 4c due to the cost, programme and operational issues of the original HS2 versions of the options 4a and 4b schemes. However the Mayor and LB Camden have highlighted the need to work harder to ensure a comprehensive station design and delivery mechanism that ensures that the whole site can be taken forward in an integrated way, and takes the opportunity provided at Euston to create a major new destination for London in a transformed environment that provides a fitting gateway to the capital. In order to ensure flexibility to deliver key EAP objectives in

whichever scenario is taken forward, the EAP has been drafted to show how key principles could be pursued under each key station design scenario. The draft EAP also seeks to challenge HS2 Ltd's preferred current "Option 8" station design, as shown in the HS2 Hybrid Bill, to allow it to better meet the EAP vision and objectives through encouraging comprehensive over site development and renewal of the existing station alongside the new HS2 station.

6.5 Issue 5. Approach to North Euston Cutting

- *Option 5a: Deliver significant housing on the North Euston Cutting (4-10 storeys)*
- *Option 5b: Deliver lower density housing/ open space on the North Euston cutting (3-6 storeys)*
- *Option 5c: Do not deliver housing on a deck north of Euston Station and Tracks (i.e. no North Euston Cutting)*

Sustainability Objectives	Options	5a	5b	5c
1. To promote the provision of a range of high quality and affordable housing to meet local needs		++	+	--
2. To promote a healthy and safe community		+	+	0
3. To ensure access to local shopping, community, leisure facilities and open space		++	++	--
4. To tackle poverty, social exclusion and promote equal opportunities		+	+	-
5. To encourage and accommodate sustainable economic growth and employment opportunities		++	+	0
6. To maximise the benefits of regeneration and development to promote sustainable communities		++	+	--
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		+	++	+/-
8. To ensure new development makes efficient use of land, buildings and infrastructure		++	+	--
9. To reduce reliance on private motorised transport		+	+	-
10. To improve amenity by minimising the impacts associated with noise		++-	++-	-
11. To protect and manage water resources and reduce flood risk		0	0	?-
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		0	0	-
13. To reduce the amount of waste requiring final disposal		-	-	0
14. To improve air quality		+	+	?-
15. To provide for the efficient use of energy.		(+)	(+)	-
16. To minimise the use of non-renewable		(+)	(+)	0

Commentary - options 5a – 5c

- 6.5.1 Option 5a would enable the efficient use of land, by proposing the positive use of new land on a deck above existing railway tracks, maximising potential for new homes, Camden's priority land use. In terms of design and historic environment, the proposals for this area could lead to an improved and better connected urban realm (with positive buildings instead of blank railway tracks), but also potential impacts on neighbouring historic terraced housing, which would need to be carefully managed through high quality design. The proposals for the area could bring benefits in terms of social exclusion through the enhanced connectivity that would result from the new route across site.
- 6.5.2 Option 5b would deliver similar benefits to option 5a in enhancing connectivity and making better use of under-utilised land. It may also provide some benefits in terms of urban design by delivering buildings at a lower density in a sensitive historic context. However, this option may not make as effective use of land by failing to maximise new homes, which are much needed in the borough. It may also play a lesser role in enabling an optimum balance of uses between the Euston Station and Tracks site and the North Euston Cutting, by delivering fewer homes to balance with employment led mixed uses on the station/ tracks site. Development viability analysis carried out to inform the Euston Area Plan (GVA, 2013) has also indicated lower density options would be unlikely to be feasible due to financial constraints. This means that in deliverability terms option 5a would appear to be more realistic.
- 6.5.3 There are strong negative impacts from option 5c compared to options that would provide development above the railway tracks, as some opportunities to enhance the existing environment and accessibility and make better use of land would be missed:
- Failure to deliver new homes to help address housing shortages and needs in the borough;
 - Failure to provide more active uses and new connections across the railway tracks, which would enhance local accessibility and overlooking of the public realm;
 - A missed opportunity to provide new green space and enhanced biodiversity/ green infrastructure
 - North Euston Cutting could enable the delivery of additional economic/ employment uses on the Euston Station site by providing housing to allow a comprehensive, well-planned approach to the area with an effective balance of uses. This would be reduced if North Euston Cutting were not taken forward.
 - North Euston Cutting also offers the opportunity to create decking that could help to reduce some of the noise from the railway tracks below
 - Loss of a site where development would be well placed to support a local energy network.
- 6.5.4 The removal of this option could have a minor positive impact in terms of urban design and heritage by avoiding new development in an area that it is close to designated heritage assets, including listed buildings. However, high quality, sensitively designed development could enhance the setting of these assets, by introducing more positive uses in place of the current railway tracks.
- 6.5.5 This appraisal has highlighted the potential benefits of decking to provide development over the tracks, but has underlined the need for careful attention to

scale, layout and detailed design as part of higher density options in order to ensure that heritage considerations are satisfactorily addressed.

7. APPRAISAL OF THE STRATEGIC PRINCIPLES AND DEVELOPMENT PRINCIPLES

- 7.0.1 Following on from the assessment of strategic options, the preferred way forward on the key issues for the future of Euston has been identified. This approach has been developed taking into account a number of sources, including:
- the responses to consultation on key issues and the draft Euston Area Plan;
 - evidence we have collected and commissioned (including the sustainability appraisal process);
 - the policies and plans of the government and the Mayor of London;
 - Camden's Core Strategy, Development Policies, Site allocations, the Camden Plan and other Council plans and strategies; and
 - other relevant plans and policies.
- 7.0.2 These preferred options are set out below and have been grouped according to theme. The matrix and accompanying commentary sets out the SA of these options and provides a justification for the appraisal. Where relevant, the main policy alternatives considered are listed below against the relevant policy. The sustainability appraisal of these main alternatives is set out in Appendix D to this report.
- 7.0.3 **General comment** – Many strategic policies and place policies would be likely to generate negative impacts in terms of waste as a result of the construction process and, where relevant, demolition. Waste from new development is a borough-wide issue, and the Camden Development Policies should be used to minimise waste from new development.

Overall strategy

Sustainability Objectives	Options	1 Overall strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		++
2. To promote a healthy and safe community		++
3. To ensure access to local shopping, community, leisure facilities and open space		++
4. To tackle poverty, social exclusion and promote equal opportunities		++
5. To encourage and accommodate sustainable economic growth and employment opportunities		++
6. To maximise the benefits of regeneration and development to promote sustainable communities		++
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		++
8. To ensure new development makes efficient use of land, buildings and infrastructure		++
9. To reduce reliance on private motorised transport		++

10. To improve amenity by minimising the impacts associated with noise	+
11. To protect and manage water resources and reduce flood risk	+
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	+
13. To reduce the amount of waste requiring final disposal	-
14. To improve air quality	+
15. To provide for the efficient use of energy.	+
16. To minimise the use of non-renewable resources	-

Commentary

The *Overall strategy* would have a number of very positive sustainability impacts. This reflects the fact that the broad intentions of the strategy are to enable the delivery additional homes, above and beyond growth area targets, maximising potential economic benefits and locating developments in a way which reduces the need to travel. The distribution of development, and approach to public realm and urban greening would help to meet a number of the sustainability criteria relating to air quality, sustainable modes of travel, healthy communities and social inclusion.

Land use strategy (Strategic Principle EAP 1)

Sustainability Objectives	Options	Homes	Economy and emp.	Retail and leisure	Social infra.	Mean-while uses
1. To promote the provision of a range of high quality and affordable housing to meet local needs		++	0	0	+	?
2. To promote a healthy and safe community		+	0	+	++	++
3. To ensure access to local shopping, community, leisure facilities and open space		+	0	++	++	0
4. To tackle poverty, social exclusion and promote equal opportunities		+	++	+	++	+
5. To encourage and accommodate sustainable economic growth and employment opportunities		0	++	+	+	+
6. To maximise the benefits of regeneration and development to promote sustainable communities		++	++	+	++	+
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		0	0	0	0	0
8. To ensure new development makes efficient use of land, buildings and infrastructure		++	+	+	0	++

9. To reduce reliance on private motorised transport	+	++	+	+	0
10. To improve amenity by minimising the impacts associated with noise	0		0	0	++
11. To protect and manage water resources and reduce flood risk	0	0	0	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0	0	0	0	0
13. To reduce the amount of waste requiring final disposal	-	-	-	0	0
14. To improve air quality	0	?	0	0	+
15. To provide for the efficient use of energy.	+	+	+	+	0
16. To minimise the use of non-renewable resources	0	0	0	0	0

Commentary

Homes

The land use strategy supports the delivery of a significant number of new homes, over and above existing growth targets allocated to the Euston area, and would therefore have a very positive impact in relation to the provision of new homes. It would also deliver wider social benefits through enabling the provision of a range of homes, including affordable homes, providing new homes in areas with excellent public transport links and good access to local facilities and services, and providing opportunities to improve urban fabric of the area and contribute to the creation of sustainable communities.

There is a need to ensure new homes are located so as to avoid negative impacts in terms of biodiversity and flood risk. These issues are addressed in the *Open space and environment strategy* section of the document. Waste from new development is a borough-wide issue, and the Camden Development Policies should be used to minimise waste from new development.

Economy and employment

This approach provides a strong focus on economic growth, and would provide strong benefits in terms of tackling poverty and exclusion, promoting equal opportunities and maximising benefits of regeneration through its emphasis on providing opportunities for local people to take advantage of economic growth at Euston. It promotes the provision of employment uses in a highly sustainable location, and employment uses could help to support a local energy network, as part of mix of uses.

There is a need to ensure employment uses are located so as to avoid negative impacts in terms of biodiversity, flood risk and air quality. These issues are addressed in the *Open space and environment strategy* section of the document, as well as the Camden Development Policies. Waste from new development is a borough-wide issue, and the Camden Development Policies should be used to minimise waste from new development.

Retail and leisure

This approach would generate strong positive impacts by seeking to increase local shopping and leisure provision in a sustainable location. The introduction of new retail uses would also contribute to the creation of vibrant streets, which can generate benefits in terms of safer communities. The policy would promote economic growth and regeneration by supporting the role of existing commercial centres whilst enabling additional retail growth.

There is a need to ensure new retail is located so as to avoid negative impacts in terms of biodiversity, which is addressed in the *Open space and environment strategy* section of the document. Waste from new development is a borough-wide issue, and the Camden Development Policies should be used to minimise waste from new development.

Social infrastructure

The approach to social infrastructure would have strongly positive sustainability impacts by providing health and other facilities that would contribute to healthy communities, enhance access to facilities through delivering new and improved provision, and contribute towards social inclusion, regeneration and sustainable communities by providing facilities and services that play an important part in creating sustainable neighbourhoods.

The approach would also generate positive impacts in terms of supporting housing growth, by providing supporting facilities and services, reducing reliance on private transport by ensuring provision of facilities and services close to where residents live, and contributing towards the efficient use of energy as community uses could form part of a balanced heat load that is needed to support local energy networks.

Meanwhile uses

This approach would be likely to generate significant benefits for local occupants in terms of health and safety and noise impacts by allowing for changes of use for uses that would be significantly affected by potential significant noise and disturbance from HS2. It would also enable efficient use of land by ensuring that land and buildings are not rendered unnecessarily vacant, instead allowing for flexible uses to make better use of space. Other potential positive impacts include economic growth, by allowing for temporary uses that could contribute to the vibrancy of the area and promoting sustainable communities by ensuring positive use of land and buildings that can contribute to vibrant and safe communities. Whilst this approach could potentially lead to the (temporary or even permanent) loss of some existing homes, this would only be in the event that homes were rendered unviable as a result of HS2, and would not therefore qualify as being of 'high quality' housing as set out in the sustainability objective.

Main policy alternatives (assessed in Appendix D)

- *Land use Alternative SP1.1: Do not seek to promote a knowledge quarter/ research based and creative uses*

Design strategy (Strategic Principle EAP 2: Design)

Sustainability Objectives	Options	Urban design strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		+
2. To promote a healthy and safe community		+
3. To ensure access to local shopping, community, leisure facilities and open space		+
4. To tackle poverty, social exclusion and promote equal opportunities		0
5. To encourage and accommodate sustainable economic growth and employment opportunities		++
6. To maximise the benefits of regeneration and development to promote sustainable communities		++
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		++
8. To ensure new development makes efficient use of land, buildings and infrastructure		+
9. To reduce reliance on private motorised transport		+
10. To improve amenity by minimising the impacts associated with noise		0
11. To protect and manage water resources and reduce flood risk		+
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		0
13. To reduce the amount of waste requiring final disposal		0
14. To improve air quality		0
15. To provide for the efficient use of energy.		0
16. To minimise the use of non-renewable resources		0

Commentary

Urban design plays an important role in ensuring that new development is of high quality and contributes positively to the character and context in terms of massing, design, legibility and layout. The emphasis on public realm, improved connectivity and new streets with active frontages would provide health benefits by promoting walking, creating safer street environments and improving access to facilities. High quality design and public realm can help to maximise benefits of regeneration by creating high quality places for local communities. Economic visioning has highlighted the importance of creating a high quality, distinctive place to maximising the economic potential of Euston. High quality public realm can also help to address flood risk through appropriate sustainable drainage measures.

Transport Strategy (Strategic Principle EAP 3: Transport)

Sustainability Objectives	Options	Transport Strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		+
2. To promote a healthy and safe community		+
3. To ensure access to local shopping, community, leisure facilities and open space		+
4. To tackle poverty, social exclusion and promote equal opportunities		+
5. To encourage and accommodate sustainable economic growth and employment opportunities		+
6. To maximise the benefits of regeneration and development to promote sustainable communities		+
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		+
8. To ensure new development makes efficient use of land, buildings and infrastructure		+
9. To reduce reliance on private motorised transport		++
10. To improve amenity by minimising the impacts associated with noise		+/-
11. To protect and manage water resources and reduce flood risk		0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		0
13. To reduce the amount of waste requiring final disposal		0
14. To improve air quality		+/-
15. To provide for the efficient use of energy.		+
16. To minimise the use of non-renewable resources		+

Commentary

The Transport Strategy would help to support economic, retail and housing growth and regeneration through the provision of necessary supporting infrastructure, and providing new connections and public realm improvements that would make the area more attractive as a growth location, as well as making it function better.

Improved connections would also be likely to improve access to services and economic opportunities. Public realm enhancements would help improve the safety of streets and other public spaces, whilst the promotion of walking and cycling would help to promote healthy lifestyles.

An emphasis on more sustainable transport modes would help to minimise private motorised transport and maximise use of more efficient energy modes. The introduction of an ultra low emissions zone would also help the promotion of non-renewable resources to fuel transport, as well as helping to address noise and air quality issues.

Whilst increased bus provision could lead to increased noise and air pollution levels this could be addressed through introduction of an ultra low emissions zone at Euston, and suitable provision to ensure that buses do not conflict with other uses.

Main policy alternatives

- *SP3.1 Euston station bus provision options (being considered by Camden and TfL):*
 - *Option 1a. Retain or re-provide existing bus station*
 - *Option 1b. Re-provide bus facility*
 - *Option 1c. East-west bus street*
 - *Option 1d. Relocate buses to existing road network*

- *SP3.2 Alternative options for taxi provision:*
 - *3.2a. Increased provision (promote additional taxi use)*
 - *3.2b. Reduced provision (seek to prevent additional taxi use)*

Environment and open space strategy (Strategic Principles EAP 4: Environment and open space)

Sustainability Objectives	Options	Environment and open space strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0
2. To promote a healthy and safe community		++
3. To ensure access to local shopping, community, leisure facilities and open space		++
4. To tackle poverty, social exclusion and promote equal opportunities		0
5. To encourage and accommodate sustainable economic growth and employment opportunities		0
6. To maximise the benefits of regeneration and development to promote sustainable communities		+
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		0
8. To ensure new development makes efficient use of land, buildings and infrastructure		+
9. To reduce reliance on private motorised transport		0
10. To improve amenity by minimising the impacts associated with noise		+

11. To protect and manage water resources and reduce flood risk	++
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	++
13. To reduce the amount of waste requiring final disposal	0
14. To improve air quality	++
15. To provide for the efficient use of energy.	++
16. To minimise the use of non-renewable resources	?

Commentary

The proposed open space provision would be likely to significantly enhance access to open space, and make a strong contribution towards the creation of healthy and sustainable communities. The promotion of an enhanced green infrastructure network would be likely to generate positive impacts in terms of flood risk, noise and air quality, through the introduction of additional urban drainage measures and urban greening. The provision of open space on the northern half of the decking would lead to significant sustainability benefits, but is likely to require additional funding (see commentary for North Euston Cutting below).

The proposed local energy network would make a strong contribution towards the efficient use of infrastructure and energy.

Main alternatives

- *Alternative SP4.1: Do not seek an ultra low emissions zone at Euston*
- *Alternative SP4.2: Do not specify energy centre locations/ local energy network potential*

Places:

- **Development Principle EAP 1: Euston Station and tracks**
- **Development Principle EAP 2: Euston Road**
- **Development Principle EAP 3: North Euston Cutting**

Sustainability Objectives	Options	Euston Station and tracks	North Euston Cutting	Euston Road
1. To promote the provision of a range of high quality and affordable housing to meet local needs		++		0
2. To promote a healthy and safe community		+	+	++
3. To ensure access to local shopping, community, leisure facilities and open space		++	++	++
4. To tackle poverty, social exclusion and promote equal opportunities		++	+	++
5. To encourage and accommodate sustainable economic growth and employment opportunities			++	++
6. To maximise the benefits of regeneration and development to promote sustainable communities		++	++	++

7. To promote high quality and sustainable urban design which protects and enhances the historic environment	++	+	++
8. To ensure new development makes efficient use of land, buildings and infrastructure	++	++	0
9. To reduce reliance on private motorised transport	++	+	++
10. To improve amenity by minimising the impacts associated with noise	0	++-	+
11. To protect and manage water resources and reduce flood risk	+	+	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0	++	+
13. To reduce the amount of waste requiring final disposal	-	-	0
14. To improve air quality	0	+	+
15. To provide for the efficient use of energy.	++	(+)	0
16. To minimise the use of non-renewable resources	++	(+)	0

Commentary

Euston station and tracks and North Euston Cutting likely to be linked in their delivery , with the main employment and retail growth taking place at Euston Station site, whilst the main residential development would be located to the rear of the station and at North Euston Cutting. Therefore land use mix options for these sites are considered together. Together they would provide a balance of homes and jobs that would deliver strong benefits in terms of housing delivery and economic growth/ employment.

Euston Station and Tracks:

The promotion of high density mixed use development would enable efficient use of land, and would introduce growth in an area with excellent sustainable transport infrastructure.

The provision of additional retail could enhance access to shopping, whilst the proposed significant enhancements to connectivity and mix of uses provided on the site would help to address social exclusion and promote regeneration by providing access to opportunities for local people both on the site and more widely.

A focus on high quality design and public realm would generate significant urban design benefits. The supporting text highlights the need for appropriate measures to address surface water flood risk. The policy would also support the development of efficient and renewable energy supply.

North Euston Cutting:

North Euston Cutting would enable the efficient use of land, by proposing the positive use of new land on a deck above existing railway tracks for housing and other uses. It would also be likely to bring benefits in terms of reducing noise from train services by covering part of the tracks, although care would be required to ensure that homes on the northern edge of the deck have a suitable environment, including soundproofing if needed.

The proposed provision of open space and a primary school would bring strong benefits in terms of access to open space and community facilities, and associated benefits in terms of the creating sustainable communities. The potential inclusion of a larger open space to the north of the North Euston Cutting would provide significant additional benefits, in particular access to open space as well as improved connectivity and accessibility, biodiversity and air quality and making efficient use of land. If the high end of the home and job ranges indicated in the plan are proposed, the sustainability benefits of (and pressure for) this larger open space would become greater. While there are potential funding issues associated with this option, these are taken into account in the text, which seeks to apply this aim flexibly while emphasising its potential role and benefits. Wider open space provision is provided in the Plan in order to ensure that open space impacts and demands from HS2 and new development are addressed as far as possible.

In terms of design and historic environment, the proposals for this area could lead to an improved and better connected urban realm (with positive buildings instead of blank railway tracks), but also potential impacts on neighbouring historic terraced housing. However the policy and supporting text highlight need for the scale and character of development to respond to this.

The proposals for the area could bring benefits in terms of social exclusion through the enhanced connectivity that would result from the new route across site.

Euston Station and Tracks / North Euston Cutting – main alternatives

- *Alternative DP1.1: Seek a higher proportion of housing (in line with Policy DP1 of the Camden Development Policies) on the Euston Station and Tracks site.*
- *Alternative DP1.2: Do not provide an open space on a deck over the railway tracks to the north of North Euston Cutting*
- *Alternative DP1.3: Allow station development and over-site development to happen organically, rather than taking a comprehensive approach*
- *Alternative DP1.4: Leave the development at the front of the station/ forecourt in its current form*
- *Alternative DP1.5: Leave the eastern (Eversholt Street) flank of Euston Station in its current form*

Euston Road:

The proposed focus on improvements to the environment along Euston Road would bring a range of strong sustainability benefits, including:

- A healthier and more safe environment for pedestrians;
- Improved access to services and facilities through the reduction in the barrier effect of Euston Road, which divides communities
- Regeneration and tackling social exclusion benefits from enhancing access for local people to opportunities and facilities in the wider area
- Supporting economic growth by significantly enhancing the attractiveness and function of the area, which is surrounded by a range of important economic uses and clusters
- Improvements to the urban and historic environment, with the potential to improve the setting of important historic assets through enhanced public realm and building frontages
- The promotion of more sustainable travel modes through a greater emphasis on walking and cycling improvements.

The focus on providing a greener environment along Euston Road would also be likely to generate positive impacts in terms of noise, habitats and air quality through the role of trees and other greenery in mitigating noise and air pollution, and providing habitat.

The supporting text also encourages additional retail and knowledge economy uses along the road, which would also be likely to bring economic benefits to the area.

Main alternatives

- *Alternative DP3.1: More stringent in relation to reducing traffic as part of enhancing the environment for pedestrians and cyclists*
- *Alternative DP3.2: Do not seek to redress the balance between motorised transport and walking/ cycling along Euston Road*

Places (2):

- **Development Principle EAP 4: Drummond Street & Hampstead Road**
- **Development Principle EAP 5: Regents Park Estate**
- **Development Principle EAP 6: Amptill & Mornington Crescent**
- **Development Principle EAP 7: West Somers Town**

Sustainability Objectives	Options	Drummond Street and Hampstead Road	Regents Park Estate	Amptill	West Somers Town
1. To promote the provision of a range of high quality and affordable housing to meet local needs		+	++	+	+
2. To promote a healthy and safe community		++	+	+	+
3. To ensure access to local shopping, community, leisure facilities and open space		++	+-	?	++
4. To tackle poverty, social exclusion and promote equal opportunities		+	+-	0	+
5. To encourage and accommodate sustainable economic growth and employment opportunities		+	0	0	+
6. To maximise the benefits of regeneration and development to promote sustainable communities		+	++-	+	++
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		+	++	+	+
8. To ensure new development makes efficient use of land, buildings and infrastructure		+	++	+	++
9. To reduce reliance on private motorised transport		+	+	+	++
10. To improve amenity by minimising the impacts associated with noise		+	+	-?	++
11. To protect and manage water resources and reduce flood risk		+	0	0	0

12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	++	0	0	0
13. To reduce the amount of waste requiring final disposal	0	-	-	-
14. To improve air quality	+	+	0	0
15. To provide for the efficient use of energy.	0	++	0	+?
16. To minimise the use of non-renewable resources	0	?	0	0

Commentary

Drummond Street and Hampstead Road:

The proposed new open space in the area would contribute strongly to the creation of healthy communities and access to open space. It could also contribute strongly to mitigating flood risk and promoting biodiversity, through appropriate landscaping measures.

The focus on maintaining and enhancing Drummond Street neighbourhood centre, which is a focal point for community, would contribute to creating sustainable communities, ensuring good access for local people to shopping facilities, and maintaining and promoting economic growth and help to mitigate HS2 construction impacts.

A range of provisions for the sub area, including new open space provision, maintaining and strengthening the role of Drummond Street and enhancing the local environment would also help to maximise the potential benefits of regeneration.

Flexibility around alternative uses for premises negatively affected by noise and disruption from HS2 would provide benefits in terms of improving amenity by enabling changes of use where current uses are rendered unviable by noise issues. A focus on enhancing the environment of Hampstead Road would help to reduce the impacts of the car and promote more sustainable alternatives.

Main alternatives

- *Alternative DP4.1: Do not pedestrianise Drummond Street*
- *Alternative DP4.2: Redevelop Maria Fidelis school site for alternative uses (not open space)*

Regent's Park Estate

The proposed strategy for Regent's Park Estate would be likely to have significant positive impacts in terms of the following sustainability issues:

- Housing delivery and making the most efficient use of land: If further infill sites are identified the provision of additional housing (including affordable housing), above and beyond previous targets for the borough and for the Euston area.
- Regeneration, urban design and sustainable communities: highlighting future potential to enhance the local area through new infill and renewal, addressing accessibility issues by enhancing connections and improving open space provision.
- Promoting the efficient use of energy by potentially connecting to a wider local energy network.

The approach would also be likely to have a range of other positive impacts on sustainability issues, including:

- Promoting safer communities by providing better overlooked streets and reducing blank frontages
- Access to local shopping and open space through improved connectivity, open space enhancements and supporting additional shopping and other uses along Robert Street
- Reducing reliance on private transport by providing new development in an area with good public transport accessibility
- Improving air quality through enhancements to green spaces.
- Addressing noise issues by providing opportunities to redevelop buildings that are potentially susceptible to noise from the expanded railway tracks with newer properties that could provide better noise insulation.

The plan illustrates how properties at risk from HS2, which are not confirmed as required but are very close to the construction area, could be re-provided if they are later negatively impacted by the construction of HS2. The plan notes the potential need to accommodate infill development in the area to re-provide as much housing in the local area for those displaced by the construction of HS2 (191 units are likely to be required at Regents Park Estate) and those potentially affected as mentioned above. There could be negative impacts in terms of social exclusion, loss of amenity space and community benefits from any additional infill development. It will need to be ensured that an appropriate package of measures in place to ensure that appropriate provision is made for people who will lose their homes, and maximum community benefits are secured from these proposals. An estate wide open space strategy which is developed in conjunction with infill and redevelopment proposals is recommended to ensure that the impacts on open space are minimised and replacement/enhancement potential is maximised.

Main alternatives

- *Alternative DP5.1: Do not seek to address routes through Regent's Park Estate?*
- *Alternative DP5.2: Less growth and change on Regent's Park Estate*
- *Alternative DP5.3: More growth and change at RPE*

Ampthill and Mornington Crescent Station:

The approach would generate sustainability benefits by allowing for the provision of new homes, making better use of under-utilised land in an area with excellent public transport accessibility. The proposed infill development could also contribute towards replacement housing for those displaced by HS2, safer communities and the towards urban design improvements by providing better overlooked and more legible streets.

Access to open space (and wider accessibility) could be enhanced further by removing the railings which currently reduce public access to the designated public open spaces at Ampthill and Harrington Square.

Results of consultation on the draft plan indicated there were community concerns concerning safety and security on the Ampthill Estate which will need to be carefully managed in any future development or enhancements to open space here.

The approach may generate negative impacts in terms of noise by locating noise sensitive development (housing) next to the railway line. This should be addressed in the supporting text, to ensure that appropriate mitigation is put in place.

The approach should also highlight need to reduce the negative impacts of the gyratory on the Mornington Crescent open space and public realm.

Main alternatives

- *Alternative DP6.1: Less growth and change on Amptill*
- *Alternative DP6.2: More growth and change on Amptill*

West Somers town

The potential noise and disturbance impacts of HS2 on the existing school site mean that the approach would be likely to generate significant positive impacts for the local community by supporting the re-location of Maria Fidelis Lower School, thus enhancing access to community facilities and supporting regeneration. Benefits include enabling additional housing provision in an area with excellent sustainable transport links. Support for the vibrancy of Eversholt neighbourhood centres would also be likely to generate positive economic impacts, whilst redevelopment offers potential opportunities to enhance the urban fabric of the area and, potentially, to support the creation of a local energy network. Renewal and intensification potential at Churchway could provide significant community benefits in terms of the provision of additional high quality housing and improvements to public realm and routes in particular.

Wider change is happening in the Somers Town Area linked to Camden's Community Investment Programme, as well as the delivery of HS2 and, potentially, Crossrail 2. Cumulative impacts from change are therefore particularly relevant in relation to the impact on this part of the plan area.

The main changes to the area proposed in the EAP that could contribute towards cumulative impacts include the station development itself and Crossrail 2 along with the proposed development (the Drummond Crescent site and exploring opportunities at Churchway) and public realm enhancements. The redevelopment of the Kings Cross railway lands (Kings Cross central) is next to Somers Town and there is also potential for cumulative impacts arising from this ongoing development. The Drummond Crescent site and Euston Station, the main development sites referred to in the EAP relevant to this area, are identified in the Camden Site Allocations document, which was subject to its own Sustainability Appraisal. The Plan also highlights the need for work with the community to address potential change at Churchway. The Plan highlights the need for development to contribute towards social infrastructure and open space, in order to address any additional demands created and ensure that unacceptable additional demands are not created for local services and open spaces. Whilst HS2 and Crossrail 2 are proposed outside of the EAP process, the Plan seeks to address potential cumulative impacts from construction by highlighting a need to manage construction impacts to minimise disruption to the local community. The HS2 and Crossrail 2 (if progressed) projects will also be subject to separate Environmental Impact Assessments, which will consider cumulative impacts arising from projects in the area. Separate work streams are also being pursued by LB Camden alongside HS2 Ltd to address the potential impacts of HS2 on surrounding communities. This work has been taken into account in developing the Euston Area Plan, with relevant measures incorporated where appropriate. In relation to development at Kings Cross, the proposals for the EAP are not anticipated to cause significant cumulative impacts, and those associated with the HS2 and Crossrail 2 projects would be assessed through these projects and mitigated accordingly.

Enhanced public realm and connectivity is promoted in the plan: whilst these routes are already public routes, the promotion of additional movement could impact on communities along the highlighted routes. The Plan therefore states that “*Any enhancements to the public realm should be progressed in discussion with the local community and be designed to balance with the amenity and safety needs of residents of the area.*”

As the Plan has been developed in conjunction with, and reflecting existing proposals within the Camden Community Investment Programme and the Camden Site Allocations, and taking into account the assessment above, it is considered that it would not lead to unacceptable cumulative sustainability impacts.

Main alternatives:

- *Alternative DP7.1: Do not redevelop Churchway*
- *Alternative DP7.2: Do not include the relocation of Maria Fidelis Lower School on the Drummond Street site (redevelop for other uses such as housing)*

Cumulative impacts

Cumulative impacts is the term used to describe the impacts that can occur as a result of more than one plan or programme being implemented together. Its purpose is to identify where cumulative impacts could create new impacts that have not been identified during the SA of the AAP or would combine to create a significant impact that was previously not significant, or an impact of a different magnitude.

This SA has assumed that the EAP and the Core Strategy (and other Camden Development Plan documents) would be implemented. It has also assumed that the other Supplementary Planning Documents in the Camden Local Development Framework have been implemented in support of the Core Strategy policies.

Outside of the Camden LDF there is also the potential for cumulative impacts with neighbouring authorities and their planning policies / development aspirations. These are set out in the table below.

Table x: Summary of potential cumulative impacts

Cumulative impact	Receptor	Comment and mitigation measures
Increased housing provision in the Euston area	Sectors of the housing market in adjacent areas that are unable to find suitable housing types.	This will add to the overall stock of housing in central and inner London which could be beneficial, particularly in areas where the average house prices are high for London.
Greater employment opportunities	People of working age in adjacent boroughs. Economic Growth	By promoting the regeneration of currently under used sites (as set out in the proposals for the opportunity sites) there should be greater job opportunities and over the long term potentially greater benefits from economic growth.
Adverse impact on adjacent services	Existing and future	If the size and structure of the residential population in the Euston area changes

and facilities	users of adjacent services and facilities	<p>(above and beyond the level of growth envisaged in the Core Strategy) there is the potential for increased demands on adjacent services which could impact on the quality and availability of these services.</p> <p>The EAP seeks to ensure that the provision of, or contributions towards, services is provided as part of development. The Mayor, LBC and other delivery partners should continue dialogue to ensure that appropriate facilities and services are in place should the demand require them.</p>
Increased pressure on adjacent open spaces	Existing and future users of adjacent open spaces	<p>An increased residential population, coupled with loss of open space as a result of HS2 could lead to increased pressure on adjacent open spaces. However the EAP plans for the provision of new, replacement or improved open space as part of growth and change, in order to mitigate this.</p>
Disruption caused by overall levels of growth and change (development and transport infrastructure)	Local residents and businesses	<p>Significant development, growth and change at Euston resulting from the construction of HS2, Crossrail 2 and over station development also within the context of the development at Kings Cross (outside the EAP area) could impact on neighbouring residential communities, including Somers Town. The EAP seeks to manage these issues and balance growth with protecting the amenity of local residents and viability of local businesses in a variety of ways including:</p> <ul style="list-style-type: none"> • managing movement and transport provision to minimise impacts including the promotion of lower impact alternatives (e.g. walking and cycling, and sustainable/ low impact freight movement) • ensuring that buildings are sensitive to context and the amenity of neighbouring residents • the protection and promotion of Drummond Street • maximising opportunities for local communities to benefit from change through affordable housing provision and employment opportunities.

8. CONCLUSIONS AND MONITORING

8.1 Overall assessment

8.1.1 Overall, the assessment indicates that the Euston Area Plan would deliver positive impacts in relation to all of the Sustainability Appraisal criteria, thus generating positive social, environmental and economic outcomes for the Euston area:

- The Plan would generate strongly positive impacts in terms of delivering new housing and affordable housing and promoting economic growth. In doing so, the proposed strategy seeks to make efficient use of land by making better use of under-utilised sites across the Plan area.
- It would have positive social and environmental impacts through open space, community facilities and retail provision, which would enhance access for local communities and help to promote healthy and safe communities.
- New mixed uses and substantial improvements would provide economic opportunities, and the emphasis on involving local people in these opportunities would be likely to generate positive regeneration and social inclusion outcomes, as would the provision of new affordable homes and community facilities.
- The Plan would be likely to generate significant positive outcomes in relation to urban design and the historic environment by seeking opportunities to significantly enhance the public realm and improve the urban environment wherever possible.
- There is a focus on sustainable transport, including enhancements to connectivity, which would support a move away from private motorised transport.
- A flexible approach to premises that could be affected by HS2/ expanded station and tracks would be likely to generate positive impact in terms of noise impacts.
- The approach seeks to address flood risk, air quality and biodiversity through its approach to green infrastructure, which would be used to mitigate each of these issues.
- Energy policy and the location of development would also serve to support the efficient use of energy through the introduction of a local energy network.

8.1.2 The main negative sustainability impacts picked up in the appraisal were:

- Waste: this is a borough wide issue, which is addressed by existing planning policies in the Camden Development Policies document
- Potential noise to new dwellings proposed next to railway tracks. Which is addressed where appropriate in each section, to ensure appropriate mitigation
- Demolition of homes associated with HS2: whilst the assessment indicates that the overall sustainability outcomes of the proposed approach are positive, there is a need for an appropriate package of measures to address impacts on affected residents and ensure those affected are able to be relocated in the local area.

8.2 How Sustainability Appraisal has influenced the process

8.2.1 The process has helped to confirm that there is a positive sustainability impact overall from the decision to allocate sites for development as opposed to a reactive 'do-nothing' approach to the development in the Euston area. It has also helped to confirm that the policies and area based principles represent sustainable options and has informed how they should be developed with regard to their environmental, social and economic impacts. It has also indicated areas where changes could be made to

make the Euston Area Plan more sustainable, which have been incorporated into the consultation draft wherever possible.

8.2.2 The production of the Euston Area Plan and Sustainability Appraisal have been carried out in an iterative way, enabling the outcomes of the appraisal to be fed into the draft Euston Area Plan objectives, policies and area based principles. Key ways in which the sustainability appraisal process has informed the approach taken to the Euston Area Plan include:

- Recommendations made regarding adjustments to the Objectives, in order to ensure that they address the full range of sustainability factors. These have been incorporated into the revised objectives contained in the draft Plan;
- Informed the decision making process regarding the strategic options for the Euston Area Plan (including the strategic alternatives assessed in Section 6 above and the assessment of main policy alternatives, which is provided in Appendix D).
- Highlighted the importance of specific issues where growth could affect the environment, for example in relation to noise, air quality, flooding and biodiversity. This has led to relevant measures being incorporated into the Euston Area Plan where appropriate, in particular informing the proposal for a green infrastructure network to address these issues on an area wide basis.

8.2.3 The SA is not the only factor developing a draft strategy for the area but it is a helpful tool in establishing whether the suggested approaches will foster sustainable development.

8.3 Monitoring the significant effects of the Euston Area Plan

8.3.1 The monitoring process set out in Section 5 of the Euston Area Plan will enable the significant effects of implementing the Plan to be supervised. A principal tool in the monitoring process will be the Camden Annual Monitoring Report, which assesses progress for a range of areas, including environmental factors such as air quality, biodiversity waste and renewable energy generation; employment and town centres, housing delivery and transport.

Appendices

Appendix A - Compliance with SEA Directive/Regulations

Appendix B - Sustainability Appraisal objectives and criteria

Appendix C - Euston Area Plan Strategic Objectives Appraisal

Appendix D - Appraisal of main policy alternatives

Appendix E - Habitats assessment screening

APPENDIX A

Compliance with the SEA Directive

Appendix A - Compliance with SEA Directive/Regulations

SEA Requirement (as set out in EU Directive 2001/42/EC)	Where Covered in SA Report
a) An outline of contents, main objectives of the plan or programme and relationship with other plans and programmes	<ul style="list-style-type: none"> • An outline of the contents of the EAP document is set out in Section 2. • The vision and objectives are detailed in Section 2 of this SA Report.
b) The relevant aspects of the current state of the environment and the likely evaluation thereof without implementation of the plan or programme	<ul style="list-style-type: none"> • Appendix 3 of the SA Scoping Report outlines the relationship with other plans, programmes and policies. • Section 4.1 and of this SA Report, and Section 4 and Appendix 3 of the Scoping Report, address the plans policies and programmes that were reviewed as part of the SA process. • Section 5 and Appendix 4 of the SA Scoping Report together provide detailed baseline information for the borough. Building on this, Section 6 of the Scoping report sets out key issues relating to the current state of the environment. • Section 4 of this SA report summarises the baseline characteristics of the borough. It covers the basic characteristics and sustainability issues in the borough, and provides a brief assessment of the likely evolution of the current state of the environment without the implementation of the EAP. Section 5 of the Sustainability appraisal of the Camden Core Strategy also sets out baseline characteristics of the borough.
c) The environmental characteristics of the areas likely to be significantly affected	<ul style="list-style-type: none"> • This is covered in Appendix 4 of the Scoping Report which identifies they key baseline information for the Borough and in the Euston Area Plan itself which identifies key characteristics for each sub area around Euston and identified key issues (including environmental issues). • Baseline environmental characteristics are also contained in section 4 of this report. • No areas subject to such designations are affected by the EAP document
d) any existing environmental problems which are relevant to the plan or programme including those relating to areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	<ul style="list-style-type: none"> • These area set out in Appendix 3 of the SA Scoping Report. • See also section 4 of this SA report which briefly outlines how these have been considered in the preparation of the EAP.
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	<ul style="list-style-type: none"> • These issues are all covered in the 16 sustainability objectives against which the EAP has been assessed. The
f) The likely significant effects on the environment, including on issues	

such as biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationships between these factors

g) The measures envisaged to prevent, reduce and as full as possible offset any significant adverse effects on the environment of implementing the plan or programme

h) Outline the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information

i) A description of measures envisaged concerning monitoring
j) a non-technical summary of the information provided under the above headings

sustainability objectives are set out in Section 4.4 and Appendix B of the Sustainability Appraisal Report, whilst the appraisal of the EAP is provided in Sections 5-7 and Appendices C and D of the Sustainability Appraisal Report.

- The preparation of the EAP and sustainability appraisal have been carried out in an iterative way, meaning that mitigation measures have been incorporated into the drafting of the EAP alongside the sustainability appraisal process. Relevant mitigation measures and changes made to the EAP are referred in Sections 5-7 of the main Report.
- Section 8.2 of the main Report then summarises the difference that the sustainability appraisal process has made.
- Sections 6 and 7 and Appendix D to this SA report detail how the main options were considered while the gaps and difficulties in obtaining some baseline data was explained in Section 5 of the SA Scoping Report.
- Proposed monitoring measures are summarised in Section 8 of this SA Report
- A non-technical summary is provided at the beginning of the Sustainability Appraisal Report.

APPENDIX B

SA Framework – SA Criteria and Objectives

Appendix B. Sustainability Appraisal Objectives and Indicators

No.	Objective	Criteria	Potential Indicator(s)
SOCIAL/ECONOMIC			
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<p>a) Will the Area Plan increase the net supply of housing, including affordable housing?</p> <p>b) Will the Area Plan protect and promote affordable housing development?</p> <p>c) Will the Area Plan provide housing for people, particularly families, on low to moderate incomes?</p> <p>d) Will the Area Plan encourage development at an appropriate density, standard, size and mix?</p>	<ul style="list-style-type: none"> • Additional home provision, new home completions • Annual average number of net additional dwellings needed to meet overall housing requirements • Compliance with regional housing minimum targets • Compliance with Housing Density • % Housing built on previously developed land • Housing Stock by Tenure • Number of affordable housing completions • Average House Prices and Council tax Banding • Ratio of average house price to gross household income • Number of wheelchair accessible properties • Number of new developments meeting Lifetime Homes • Number of homeless households • Condition of housing stock: Unfit dwellings by tenure • Number of overcrowded households • Household size: No of people living in property • % of housing in mixed use schemes • Housing/dwelling type • Household composition • Ratio of average house price to gross household income • Additional home provision, new home completions
2	To promote a healthy and safe community	<p>a) Will the Area Plan protect and enhance the provision of healthcare and other emergency services facilities in the area?</p> <p>b) Will the Area Plan promote healthy living through e.g. provision of walking, cycling and recreation facilities?</p> <p>c) Will the Area Plan help reduce levels of crime and fear of crime?</p>	<ul style="list-style-type: none"> • % people who describe their health as good/not good • Number of population with limiting long-term illnesses • Access to a GP per 1000 population • Floorspace of community facilities/services lost/ retained/ gained • Access to public open space • Number of sports/playing fields and outdoor recreation spaces • Recorded crime per 1,000 population for burglaries, criminal

No.	Objective	Criteria	Potential Indicator(s)
			<p>damage, drug offences, robbery and violence against a person.</p> <ul style="list-style-type: none"> • Percentage of residents surveyed who feel 'fairly safe' or 'very safe' after dark whilst outside their local area • % developments incorporating secure by design principles(No record available) • % Reduction in the number of people killed or seriously injured in road accidents • Number of sites with potential land contamination issues
3	To ensure access to local shopping, community, and leisure facilities and access to and enhancement of open space	<p>a) Will the Area Plan encourage mixed-use development? b) Will the Area Plan encourage the retention and development of key services? c) Will the Area Plan encourage the location of services in proximity to public transport? d) Will the Area Plan help to increase access to and improve overall open space provision, including children's play space?</p>	<ul style="list-style-type: none"> • Total number of mixed use developments completed • Distribution of local services across the borough • Floorspace of community facilities/services lost/retained/gained • Town Centre Health Check • % Ground Floor Vacant Floor-space in primary Shopping Frontages (London frontages and neighbourhood centres) • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres (over 4 years) • Access to public open space • Amount of children's play space available • Open spaces lost/ gained/ improved • Open space deficiency
4	To tackle poverty and social exclusion	<p>a) Will the Area Plan encourage development that facilitates social cohesion? b) Will the Area Plan provide for equality of access for all to facilities, buildings and services? c) Will the Area Plan encourage development opportunities in those areas in need of economic development?</p>	<ul style="list-style-type: none"> • Number of Super Output Areas within 10% and 20% most deprived in England. • Unemployment rate by ward • Deprivation by ward • Number of existing homes with improved SAP rating • % of public buildings fully accessible • %/ No. of housing units designed to wheelchair accessibility • Number of dwellings meeting Lifetime Homes standards • Number of wheelchair accessible housing in social housing sector • Number of Hostels and Care Homes

No.	Objective	Criteria	Potential Indicator(s)
			<ul style="list-style-type: none"> • Town Centre Health Check • % Ground Floor Vacant Floor-space in primary Shopping Frontages (London frontages and neighbourhood centres) • Changes in Vacant Employment Land
5	To encourage and accommodate sustainable economic growth and employment opportunity	<p>a) Will the Area Plan encourage the retention and growth of existing, locally based industries?</p> <p>b) Will the Area Plan accommodate new and expanding businesses?</p> <p>c) Will the Area Plan encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Will the Area Plan focus growth on Core Strategy retail growth areas and designated frontages within the retail hierarchy?</p>	<ul style="list-style-type: none"> • Employment floorspace lost/retained/created • Composition of businesses operating in Camden • Changes in vacant employment land • Net changes in use classes by floorspace • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres) • Completed retail and financial services and offices floorspace • Economic activity of the population of Camden • Occupation of those currently in employment by industry • Unemployment by Ward • Long-term unemployment (% of unemployed who have been out of work for over one year) • Claimant count unemployment rate
6	To maximise the benefits of regeneration and development to promote sustainable communities	<p>a) Will the Area Plan encourage sustainable inward investment that will promote social wellbeing and benefit the economy?</p> <p>b) Will the Area Plan promote access to employment opportunities for local people?</p> <p>c) Will the Area Plan protect existing and provide for new education facilities to meet needs, both for existing and new residents?</p>	<ul style="list-style-type: none"> • Employment floorspace lost/retained/created • % Unemployment levels • Nos. of local people employed • Completed Retail, office and leisure Floorspace (net) designated centres (central London frontages, town centres and neighbourhood centres (over 4 years) • % of new housing on previously developed land • Economic Activity of population • Occupation of those currently in employment • Unemployment by Ward • Long-term unemployment (% of unemployed who have been out of work for over one year) • Claimant count unemployment rate • Area of new education facilities created

No.	Objective	Criteria	Potential Indicator(s)
ENVIRONMENTAL			
7	To promote high quality and sustainable urban design which protects and enhances the historic environment	<p>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?</p> <p>b) Will the Area Plan ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Will the Area Plan ensure protection and enhancement of the historic significance of heritage assets and their settings and the wider historic environment?</p> <p>d) Will the Area Plan encourage the use of sustainable design and construction?</p>	<ul style="list-style-type: none"> • % of new housing on previously developed land • Compliance/Comparison with GLA London Plan Density matrix • No. of Conservation Areas designated • No. of Listed Buildings at Risk • No. of Scheduled Ancient Monuments • Impact on potential archaeological deposits • No. of Tree Preservation Orders (TPOs) served • No. of new developments with Code for Sustainable Homes levels 4-6 or BREEAM assessments scores of Very Good or Excellent • % new developments using sustainable construction
8	To ensure new development makes efficient use of land, buildings and infrastructure.	<p>a) Will the Area Plan encourage the reuse or improvement of buildings and land, that are vacant, under utilised or in disrepair?</p> <p>b) Will the Area Plan ensure efficient use of land through maximising densities where appropriate?</p>	<ul style="list-style-type: none"> • % of new housing on previously developed land • Compliance/Comparison with GLA London Plan Density matrix • % of vacant buildings
9	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	<p>a) Will the Area Plan encourage development at locations that enable walking, cycling and/or the use of public transport?</p> <p>b) Will the Area Plan encourage the provision of infrastructure for walking, cycling and/or the provision of public transport?</p> <p>c) Will the Area Plan</p>	<ul style="list-style-type: none"> • % increase in bus passenger journeys • % reduction in number of people killed or seriously injured in road accidents. • % reduction in motor traffic flows through the borough • % increase in cycling as a share of the modal split • location of major transport demand generating developments

No.	Objective	Criteria	Potential Indicator(s)
		<p>encourage access for all to public transport?</p> <p>d) Will the Area Plan encourage an increase in car free and car capped housing?</p> <p>e) Will the Area Plan enhance permeability of the area for access by non motorised forms of transport?</p>	<ul style="list-style-type: none"> • car-free and car-capped housing as percentage of new housing • distribution of local services throughout the borough
10	To improve amenity by minimising the impacts associated with noise	<p>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?</p> <p>b) Will the Area Plan ensure new noise sensitive uses are not located near existing established noise generating uses?</p>	<ul style="list-style-type: none"> • Nos. of complaints about noise • % increase/decrease in ambient noise levels
11	To protect and manage water resources and reduce flood risk and respond to the potential impacts of climate change	<p>a) Will the Area Plan promote the sustainable use of water resources?</p> <p>b) Will the Area Plan encourage development that incorporates sustainable drainage?</p> <p>c) Will the Area Plan help to reduce the risk of flooding and increase flood resilience?</p>	<ul style="list-style-type: none"> • % of new developments incorporating sustainable drainage measures • % new developments incorporating water conservation measures (e.g. rainwater harvesting and greywater recycling) • Number of properties at risk from 5% and 1.3% surface water flood events • No. of planning permissions granted contrary to advice from the Environment Agency on flooding or water quality • Annual domestic water consumption by type (a) potable; and (b) other
12	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<p>a) Will the Area Plan protect and enhance natural habitats in the area, particularly those of priority species?</p> <p>b) Will the Area Plan provide for the protection of biodiversity and open space in the area?</p> <p>c) Will the Area Plan encourage the creation of new habitats, including through the provision of additional open space and</p>	<ul style="list-style-type: none"> • Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation Importance (SNCIs) and designated open spaces • Open space deficiency • No. of tree preservation orders served • No. of applications affecting trees protected by TPOs • No. of applications permitted that involved the loss of trees protected by TPOs

No.	Objective	Criteria	Potential Indicator(s)
		green roofs? d) Will the Area Plan protect and provide for the planting of more trees in the area?	<ul style="list-style-type: none"> • No. of new developments incorporating green roofs, landscaping or open space to improve biodiversity
13	To reduce the amount of waste requiring final disposal	a) Will the Area Plan ensure reduction of waste during the development process and/or operation? b) Does the Area Plan encourage the movement of waste up the hierarchy?	<ul style="list-style-type: none"> • % new developments using sustainable construction • % of households recycling • % of total waste recycled and composted • Annual household waste per head of population (tonnes) • % of household waste recycled
14	To improve air quality	a) Will the Area Plan reduce CO ₂ and other greenhouse gas concentrations in the atmosphere? b) Will the Area Plan reduce the discharge of particulate matter to the atmosphere? c) Will the Area Plan contribute to an improvement of air quality?	<ul style="list-style-type: none"> • Number of days when air pollution exceeds limits • Carbon dioxide (CO₂), Nitrogen dioxide (NO₂) and particulate matter (PM₁₀) emissions • Reduction in traffic flows along roads in the borough • Increase in walking • Increase in cycling • Increase in public transport journeys
15	To provide for the efficient use of energy in order to mitigate and adapt to the potential impacts of climate change	a) Will the Area Plan encourage the generation and use of renewable and low carbon energy? 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.	<ul style="list-style-type: none"> • Proportion of energy generated from renewable sources • Number of new developments achieving Code for Sustainable Homes level 4-6 or BREEAM ratings of very good or excellent • Number of existing homes retrofitting to improved energy efficiency standards • Domestic energy efficiency • Annual average domestic energy consumption of (a) natural gas; (b) electricity • No. of planning applications accompanied by a BREEAM/ Code for Sustainable Homes assessment
16	To minimise the use of fossil fuels, aggregates and non-renewable resources.	a) Will the Area Plan encourage more efficient supply and use of natural resources? b) Will the Area Plan encourage sustainable design and construction? c) Will the Area Plan encourage the use of alternative modes of transport to the private car?	<ul style="list-style-type: none"> • Number of new developments achieving Eco-homes or BREEAM ratings of very good or excellent • Proportion of energy generated from renewable sources • %/No. of new developments incorporating water conservation measures e.g. SUDS • No. of planning applications accompanied by BREEAM or EcoHomes assessments • % new developments using

No.	Objective	Criteria	Potential Indicator(s)
			sustainable construction <ul style="list-style-type: none">• Increase in walking• Increase in cycling• Increase in bus passenger journeys• Car-free and car-capped housing

APPENDIX C

Assessment of Strategic Objectives

Appendix C – Euston Area Plan Strategic Objectives Appraisal

Key: Attributing effects	
++	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

1. Prioritising local people's needs: To ensure that new development meets local needs by ensuring homes, jobs, businesses, schools and open space lost or affected by HS2, should it go ahead, are re-provided in the Euston area.		
Sustainability Objectives	Score	Comment
1. High quality affordable housing	++	Supports the delivery of affordable homes by prioritising provision of replacement homes for those that are lost as a result of HS2, the majority of which are social rented. Objectives do not make specific reference to maximising development opportunities to provide <i>additional</i> homes across the Euston area. Objective 3 has therefore now been revised to include reference to wider regeneration opportunities.
2. Promote a healthy, safe community	++	Seeks the re-provision of any open space lost as a result of HS2, thus contributing to health objectives. Re-provision of business premises and relocation of schools could also contribute to the creation of strong local communities. The EAP refers to the re-provision of other community facilities that would be lost as a result of HS2, for example any community halls.
3. Access to shops, facilities & open space	++	Prioritises replacing lost businesses and open space, and thus contributes to access to shops, facilities and open space. The EAP refers to the re-provision of other community facilities that would be lost as a result of HS2,.
4. Tackle poverty & social exclusion	++	Helps to mitigate the potential impacts of HS2 by prioritising the re-provision of social housing and local jobs and relocating affected schools that play an important part in tackling disadvantage.
5. Sustainable	+	Helps to support the economy and employment through prioritising the re-provision of jobs and business

	1. Prioritising local people's needs: To ensure that new development meets local needs by ensuring homes, jobs, businesses, schools and open space lost or affected by HS2, should it go ahead, are re-provided in the Euston area.	
Sustainability Objectives	Score	Comment
economic growth & employment opportunity		premises.
6. Maximise benefits of regeneration	0	Focuses on mitigating impacts (i.e. replacing lost uses) rather than promoting regeneration and new uses.
7. Promote high quality sustainable urban design	0	Does not have any implications for the quality of design (dealt with under objective 2)
8. Ensure efficient use of land, buildings & infrastructure	0	Does not have any implications in relation to the efficient use of land, buildings and infrastructure. Prioritising the use of land and buildings to re-provide lost uses would be considered to be an effective use of land.
9. Reduce reliance on private transport	0	Does not have any significant implications in terms of transport as it relates to the re-provision of existing uses. Re-provision of uses in the Euston area would be positive in that it would allow lost uses to be re-provided in an area of high public transport accessibility.
10. Improve amenity, minimising noise impact	+	Contributes to maintaining amenity in a general sense through the maintenance of local open spaces and facilities.
11. Water resources & flood risk	0	No significant implications for flood risk. Strategic Principle EAP4 addresses detailed flood risk issues in the area.
12. Protect & enhance habitats & biodiversity	++	Provision of replacement open space could ensure that existing habitat that would be lost on open spaces as a result of HS2 can be re-provided. Detailed policies reinforce this by promoting the green infrastructure/ biodiversity as part of replacement open spaces
13. Reduce waste	0	No significant implications for waste.

	1. Prioritising local people's needs: To ensure that new development meets local needs by ensuring homes, jobs, businesses, schools and open space lost or affected by HS2, should it go ahead, are re-provided in the Euston area.	
Sustainability Objectives	Score	Comment
14. Improve air quality	0+	No significant implications for air quality. The re-provision of open spaces could have a positive impact by maximising the provision of green space. Objective 7 has been revised to include reference to improving air quality along Euston Road
15. Provide for energy efficiency	0	No significant implications for energy efficiency, subject to an appropriate policy approach to energy and sustainability. Objective 6 relates to sustainability and energy issues, which would relate to replacement as well as new land uses.
16. Minimise fossil fuel use, aggregates & non-renewables	0	No significant implications, subject to appropriate policy approach in relation to resources and energy.
Overall Social Impact	+	This objective will have a strong positive social impact as it places a priority on addressing and mitigating the social effects of HS2, through the re-provision of homes, jobs and social infrastructure such as open spaces.
Overall Environmental Impact	0+	This objective is likely to have a slightly positive impact through prioritising the re-provision of open spaces, although there would be a generally neutral environmental impact from the re-provision of homes, business premises and facilities.
Overall Economic Impact	+	This objective will have a positive impact for the local economy by prioritising the re-provision of jobs and business premises.
Draft Strategic Objective	2. Securing excellent design: To work to ensure that any new station or development is of excellent design, easy to access, complements the character and heritage of the area, and helps to improve the image and function of the Euston area.	

Sustainability Objectives	Score	Comment
1. High quality affordable housing	++	Securing excellent design will help to achieve high quality housing development.
2. Promote a healthy, safe community	++	High quality design and improvements to places and streets will help reduce fear of crime and opportunity for crime as well as encouraging walking. Detailed policy addresses the role of design in promoting community safety and increasing the sense of security in the public realm.
3. Access to shops, facilities & open space	++	The NPPF highlights the role of design in improving accessibility. High quality design should result in improved access to buildings, places and streets. Detailed policy should address the role of design in enhancing links to shops, facilities and open space.
Tackle poverty & social exclusion	+	High quality design is used to improve the urban environment, including in deprived areas. This can be used, as part of a package of measures, to enhance the local environment and the function of an area, where needed. The objective has been amended to refer to helping “to improve the image <u>and function</u> of the Euston area”.
5. Sustainable economic growth & employment opportunity	++	Improving the design and appearance of places will create a better, more attractive environment and this will help to attract people and business to the area. This could have a significant, positive impact in the Euston area given its Central London location and the current urban design issues that constrain its attractiveness.
6. Maximise benefits of regeneration	++	Improving the quality of the physical environment could help regeneration by providing a more attractive environment both for existing and new residents and businesses.
7. Promote high quality sustainable urban design	++	This EAP objective is very similar to the sustainability objective and both have the same goal.
8. Ensure efficient use of land, buildings & infrastructure	++	High quality design will enable maximised densities while minimising detrimental effects of increasing densities.
9. Reduce reliance on private	++	High quality design and improvements to places and streets will help encourage people to walk and cycle more rather than drive as the pedestrian/cyclist environment will be enhanced.

Draft Strategic Objective	2. Securing excellent design: To work to ensure that any new station or development is of excellent design, easy to access, complements the character and heritage of the area, and helps to improve the image and function of the Euston area.	
Sustainability Objectives	Score	Comment
transport		
10. Improve amenity, minimising noise impact	+	High quality design can help to ensure that buildings are better designed to mitigate against noise impacts.
11. Water resources & flood risk	0+	Although not directly linked, high quality design should include consideration of water efficiency and flood risk.
12. Protect & enhance habitats & biodiversity	0+	Although not directly linked, high quality design could involve incorporating elements to enhance biodiversity (i.e. through green roofs, soft landscaping).
13. Reduce waste	0	High quality design may not necessarily automatically address all waste issues. Waste is a wider issue that is already addressed in the London Plan and Camden Core Strategy and Development policies.
14. Improve air quality	0+	No significant impacts although high quality design and incorporate energy efficiency, and other measures such as green roofs that may help to address air quality. Wider urban design can help to mitigate air quality issues by providing for greening of the local environment.
15. Provide for energy efficiency	0+	High quality design can incorporate energy efficiency, including through passive measures as well as sustainable technology. Camden's Core Strategy and Development Policies already set out local requirements in relation to energy efficient design.
16. Minimise fossil fuel use, aggregates & non-renewables	+	High quality design can help to minimise energy use through energy efficient design and ensuring that development is of lasting quality that does not require replacement.
Overall Social Impact	++	Well designed places and developments will greatly enhance the urban environment, improve accessibility, create more pleasant and safe environments and add to people's quality of life.
Overall Environmental	++	Excellent design plays an important role in creating a pleasant local environment, addressing environmental challenges including climate change, sustainable travel and energy efficiency; flooding; and air quality.

Draft Strategic Objective	2. Securing excellent design: To work to ensure that any new station or development is of excellent design, easy to access, complements the character and heritage of the area, and helps to improve the image and function of the Euston area.	
Sustainability Objectives	Score	Comment
Impact		
Overall Economic Impact	++	Sustainable design and attractive places and streets help create a more appealing urban environment, helping to create vibrant places helping to attract business, visitors and investment. This is particularly important in the Euston area, where its competitive location is currently compromised by urban design shortcomings.

Draft Strategic Objective	3. Making the best use of new space created above the station and tracks and opportunities for regeneration in the wider area: To make sure any new development above the station and regeneration in the wider area provides a mix of homes, shops, jobs, open space, services, education and leisure facilities that benefits existing and future residents, businesses and visitors	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	++	Maximising opportunities above the station and tracks and wider regeneration could make the most of the potential for new housing (including affordable housing) above the station and tracks, and elsewhere, making an important contribution to housing delivery in Camden. This objective has been amended from the draft version to refer to potential for wider regeneration opportunities.
2. Promote a healthy, safe community	++	The current station shed has blank facades which detract from the street scene, create a negative environment and reduce overlooking of the street. Maximising opportunities for new uses above the station and tracks would provide the potential to create more active frontages that relate better to the surrounding streets. More widely, regeneration could allow the creation of improved frontages in key locations, which could enhance the safety of key routes.
3. Access to shops, facilities & open space	++	New uses above the station and more widely could enhance the availability of shops, facilities and open space through additional provision. However, it would need to be ensured that new uses do not place excessive additional pressure on existing facilities and open space. Open space provision as part of new development is addressed through detailed policies
4. Tackle poverty & social exclusion	++	The provision of new uses above the station could help to tackle poverty and social exclusion by providing facilities and employment opportunities for local people.
5. Sustainable economic growth & employment opportunity	++	New uses above the station site in particular could provide significant opportunities for economic growth and employment. Consideration would need to be given to ensuring that new uses do not negative affect surrounding businesses/ employment opportunities. The EAP includes policy measures to address this, for example in seeking to protect and promote Drummond Street (Development Principle EAP4), managing retail growth and seeking to maximise employment opportunities for local people (Strategic Principle EAP1).
6. Maximise benefits of	++	Provision of a range of new uses above the station and more widely would maximise the benefits of regeneration by providing a range of uses to meet needs and generate growth, as well as contributing to a more active street

Draft Strategic Objective	3. Making the best use of new space created above the station and tracks and opportunities for regeneration in the wider area: To make sure any new development above the station and regeneration in the wider area provides a mix of homes, shops, jobs, open space, services, education and leisure facilities that benefits existing and future residents, businesses and visitors	
Sustainability Objectives	Score	Comment
regeneration		scene and better connections through the area.
7. Promote high quality sustainable urban design	+	The provision of a mix of uses and the redevelopment of appropriate buildings and areas that currently detract from the street scene would present the opportunity to provide buildings with more active frontages, enabling a significantly improved, more vibrant public realm.
8. Ensure efficient use of land, buildings & infrastructure	++	<p>Provision of a mix of uses above the station and tracks would make significantly more efficient use of land and infrastructure than the current station shed arrangement with open track area behind. Similarly, development in the wider area could allow more effective use to be made of currently under-utilised land.</p> <p>This objective could take advantage of the development potential of an area with generally excellent public transport links in a Central London location.</p>
9. Reduce reliance on private transport	++	The station site and most of the wider Euston area has excellent public transport links. A mix of uses above the station would ensure that growth can take place in a location that does not necessitate use of the private car. Under Camden's Core Strategy and Development Policies, car free development would be expected in this location.
10. Improve amenity, minimising noise impact	++	<p>Development on a deck above the station and, in particular the tracks, could remove above-surface noise generated by both existing train services and new high speed trains. This is a particularly important issue for the new high speed trains, which are currently know to generate higher levels of noise which peaks as trains arrive and depart. This would generate significant benefits for surrounding communities in terms of improving amenity and mitigating the potential impacts of HS2.</p> <p>The text in Section 3.3 (design) highlights noise as an important consideration in protecting the amenity of existing and future residents.</p>
11. Water resources & flood risk	+ -	<p>Mixed use development including open space would provide the opportunity to enable growth in an area that is not in an identified flood risk zone (as set out by the Environment Agency), whilst also enabling measures to address existing surface water flooding issues in the area that have been identified at the local level. New development above the station could provide greater potential to address flood risk issues and the retention (or re-provision) of a station shed only on the site.</p> <p>However, if surface water flooding issues are not adequately dealt with as part of development above the station and tracks, there is a risk that new vulnerable uses (such as housing) could be introduced to an area of surface</p>

Draft Strategic Objective	3. Making the best use of new space created above the station and tracks and opportunities for regeneration in the wider area: To make sure any new development above the station and regeneration in the wider area provides a mix of homes, shops, jobs, open space, services, education and leisure facilities that benefits existing and future residents, businesses and visitors	
Sustainability Objectives	Score	Comment
		water flood risk. Strategic Principle EAP4 therefore seeks to ensure that any opportunities to mitigate surface water flood risk are addressed as part of over site development.
12. Protect & enhance habitats & biodiversity	++	<p>There is no identified biodiversity interest in the station and tracks, and any impact on biodiversity would be affected by HS2 itself, rather than consequent over site development. There is biodiversity interest in the area, although the policies in the EAP seek to guide development away from these locations (where they are not already affected by HS2).</p> <p>Provision of a mix of uses including open space (and, potentially, green roofs) could enable the provision of additional habitat, thus enhancing biodiversity in the area.</p> <p>Strategic Principle EAP4 and the Development Principles in Section 4 seek to make the most of potential to create new habitats as part of open space and green/ brown roofs as part of development</p>
13. Reduce waste	0	No specific implications for waste. Camden's Core Strategy and Development Policies set out the Council's position in relation to construction and household waste.
14. Improve air quality	+-	<p>New development above the station and tracks and more widely could help to address air quality issues by integrating green space as part of development that could help to mitigate air pollution.</p> <p>However, it would need to be ensured that sensitive new uses (such as housing) are not situated in locations where they could be subject to unacceptably poor air quality. The text in Section 3.3 (design) highlights air quality as an important consideration in protecting the amenity of existing and future residents.</p>
15. Provide for energy efficiency	+	A mix of uses above the station and more widely could help to support a local energy network which would supply energy efficiently around the area, and could potentially be connected to (and take advantage of) the significant energy use of the station itself.
16. Minimise fossil fuel use, aggregates & non-renewables	+	A mix of uses above the station and more widely could help to support a local energy network which would supply energy efficiently around the area, and could potentially be connected to (and take advantage of) the significant energy use of the station itself.
Overall Social Impact	++	This objective could deliver significant benefits through enabling the provision of housing, community facilities and job opportunities
Overall	++	The site above the station and the area more widely is a sustainable location for mixed use development due to

Draft Strategic Objective	3. Making the best use of new space created above the station and tracks and opportunities for regeneration in the wider area: To make sure any new development above the station and regeneration in the wider area provides a mix of homes, shops, jobs, open space, services, education and leisure facilities that benefits existing and future residents, businesses and visitors	
Sustainability Objectives	Score	Comment
Environmental Impact		excellent public transport, walking and cycling connections. The provision of new development could also deliver a significantly improved local environment, with the potential to mitigate flooding and air quality issues (subject to detailed policy approach). Also offers the potential to deliver an efficient energy supply as part of a wider network.
Overall Economic Impact	++	Could deliver economic growth in a competitive Central London location, generating significant investment and providing a substantial number of new jobs. The more detailed policy approach in the EAP considers the impact of economic growth on the local area both in terms of the impacts on existing businesses/ character and enabling local people to take advantage of employment opportunities.

Draft Strategic Objective	4. New streets above the station and tracks: To create new green streets above and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building.	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	0	No relationship. Housing provision is addressed by other objectives and existing policies.
2. Promote a healthy, safe community	++	<p>New connections across the station and tracks would significantly improve connections between Somers Town and Regent's Park estate, enhancing accessibility to facilities; promoting walking and cycling by providing new direct links; and providing the opportunity to connect two communities that have been separated by the current railway line.</p> <p>The design of streets and the extent of overlooking are very important to safety, and the perception of safety. Detailed policies in the EAP seek to ensure that streets have sufficient overlooking and active frontages where appropriate in order to address this.</p>
3. Access to shops, facilities & open space	++	This objective would deliver significant improvements in access to shops, facilities and open space by providing significantly enhanced connections. The provision of new streets could also allow the provision of new uses along street frontages, including shops, services and facilities.
4. Tackle poverty & social exclusion	++	The current station site and tracks restrict movement and creates a poor local environment. The provision of new streets above the station and tracks would allow greater connections to opportunities as well as improving the environment, with new connections and public realm improvements potentially attracting significant additional investment in the area
5. Sustainable economic growth & employment opportunity	++	<p>The provision of new streets could help to generate additional investment by transforming the local environment and local connectivity, thus making the area more attractive. The potential for local people to access employment (and other) opportunities would also be enhanced.</p> <p>New streets would also provide the potential location for new high quality employment uses as part of a vibrant mix of uses.</p>
6. Maximise benefits of regeneration	++	Improved connections and local environment could deliver improvements for the local, access to opportunities and increased investment.
7. Promote high quality sustainable	++	The provision of new streets could transport the public realm and provide the framework for a significantly improved streetscape around the station and tracks.

Draft Strategic Objective	4. New streets above the station and tracks: To create new green streets above and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building.	
Sustainability Objectives	Score	Comment
urban design		
8. Ensure efficient use of land, buildings & infrastructure	++	Could allow efficient use of land by providing the framework for the delivery of buildings as part of a new urban realm.
9. Reduce reliance on private transport	+	Significant enhancements to walking and cycling through the provision of more direct routes could lead to reduced need for private car use. New streets could also provide links for private transport, although draft Objective 8 highlights an emphasis on sustainable travel.
10. Improve amenity, minimising noise impact	0	No significant relationship. New streets could generate noise impacts through increased traffic.
11. Water resources & flood risk	0+	No significant relationship.
12. Protect & enhance habitats & biodiversity	0+	No significant relationship. Detailed policy approach should address the potential for new streets to enhance habitat/ biodiversity interest through the provision of street trees.
13. Reduce waste	0	No relationship.
14. Improve air quality	+/-	Provision of new streets could generate additional capacity for vehicle movements, which could lead to negative impacts in relation to air quality. Detailed policy approach seeks to manage the character and role of new streets to address this through seeking green routes through the provision of new trees and/ or other planting which could have a positive impact on air quality in the area.
15. Provide for energy efficiency	0	No relationship.

Draft Strategic Objective	4. New streets above the station and tracks: To create new green streets above and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building.	
Sustainability Objectives	Score	Comment
16. Minimise fossil fuel use, aggregates & non-renewables	+	Significant enhancements to walking and cycling through the provision of more direct routes could lead to reduced need for private car use. New streets could also provide links for private transport, although draft Objective 8 highlights an emphasis on sustainable travel.
Overall Social Impact	++	Strongly positive social impacts due to improved accessibility and connections to local jobs, shops, facilities and open space, as well as a significantly improved local environment for people regeneration benefits. New streets could also provide shops and services that could be of benefit to local people.
Overall Environmental Impact	+	Positive environmental impacts include a significantly enhanced public realm; improved walking and cycling; and making better use of land. Environmental impacts are further enhanced by detailed policies in the EAP which seek to ensure that new streets are managed to favour pedestrians, cyclists and public transport; and to provide a greener environment that mitigates air quality and surface water flood risk.
Overall Economic Impact	++	Strongly positive economic impacts would be generated by enhancing access to economic opportunities, generating significantly increased investment through creating a much more attractive environment; and providing an urban framework for the provision of economic uses, as part of a mix of uses.

Draft Strategic Objective	5. Boosting the local economy by reinforcing existing economic assets and businesses: To provide new spaces for existing and new businesses and shops, and encourage new and innovative business sectors in the Euston area, such as knowledge or creative industries, and secure significant new job and training opportunities for local people.	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	NA	No relationship. This is addressed by other draft objectives.
2. Promote a healthy, safe community	NA	No relationship. This is addressed by other draft strategic objectives.
3. Access to shops, facilities & open space	++	The provision of new businesses and shops could provide additional amenities for local people.
4. Tackle poverty & social exclusion	++	The provision of new jobs and business sectors, with a focus on new job and training opportunities for local people could provide significant benefits in helping to tackle poverty and social exclusion.
5. Sustainable economic growth & employment opportunity	++	This objective seeks to ensure the Euston makes the most of its significant potential to generate economic growth, building on existing strengths in the area. It provides the potential to deliver strategic economic benefits through a focus on nationally important economic clusters that surround the study area.
6. Maximise benefits of regeneration	++	This objective would maximise the benefits of regeneration by seeking to encourage economic growth whilst seeking to ensure that local people can be involved through job and training opportunities.
7. Promote high quality sustainable urban design	0+	No significant relationship. High quality design can help to generate investment and growth through the creation of a more attractive environment.
8. Ensure efficient use of land, buildings & infrastructure	0+	No significant relationship. Promoting the provision of retail and business space in the Euston area would help to allow more effective use of a central/ inner London area with excellent transport links.

Draft Strategic Objective	5. Boosting the local economy by reinforcing existing economic assets and businesses: To provide new spaces for existing and new businesses and shops, and encourage new and innovative business sectors in the Euston area, such as knowledge or creative industries, and secure significant new job and training opportunities for local people.	
Sustainability Objectives	Score	Comment
9. Reduce reliance on private transport	0+	No significant relationship. The promotion of economic growth in this location would provide the benefit of focusing new economic uses in an area of predominantly excellent public transport accessibility.
10. Improve amenity, minimising noise impact	N/A	No relationship.
11. Water resources & flood risk	N/A	No relationship.
12. Protect & enhance habitats & biodiversity	N/A	No relationship.
13. Reduce waste	N/A	No relationship.
14. Improve air quality	N/A	No relationship.
15. Provide for energy efficiency	0+	No significant relationship. The provision of business uses as part of a mix of uses would help to support a local energy network by providing balanced overall demand for energy.
16. Minimise fossil fuel use, aggregates & non-renewables	N/A	No relationship. Environmental sustainability issues are deal with by Objective 6.
Overall Social Impact	+	Likely to have a positive impact by seeking to ensure that local people are included in employment opportunities, as well as potentially providing new shops that could be accessed by local people.
Overall	0	Likely to have a neutral economic impact.

Draft Strategic Objective	5. Boosting the local economy by reinforcing existing economic assets and businesses: To provide new spaces for existing and new businesses and shops, and encourage new and innovative business sectors in the Euston area, such as knowledge or creative industries, and secure significant new job and training opportunities for local people.	
Sustainability Objectives	Score	Comment
Environmental Impact		
Overall Economic Impact	++	Likely to have a strongly positive economic impact, by seeking to address local economic issues and opportunities, whilst also focusing on the potential to take advantage of surrounding knowledge/creative clusters: this could have significant benefits for London and, possibly, nationally.

Draft Strategic Objective	6. Creating sustainable development: To plan for carbon free sustainable development and a local low carbon energy network in Euston and enhance the quality and sustainability of the local environment.	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	N/A	No relationship. Housing provision is dealt with by other objectives.
2. Promote a healthy, safe community	0+	Sustainably designed homes are more energy efficient, reducing bills, which can be of particular benefit to the health of more vulnerable residents. Sustainably designed homes can also help to provide a more healthy environment through the delivery of less polluting development.
3. Access to shops, facilities & open space	N/A	No relationship.
4. Tackle poverty & social exclusion	N/A	Sustainably designed homes are more energy efficient, reducing bills, which can be of particular benefit to the health of more vulnerable residents.
5. Sustainable economic	N/A	No relationship

Draft Strategic Objective	6. Creating sustainable development: To plan for carbon free sustainable development and a local low carbon energy network in Euston and enhance the quality and sustainability of the local environment.	
Sustainability Objectives	Score	Comment
growth & employment opportunity		
6. Maximise benefits of regeneration	+	Sustainable building and the creation of a local energy network could be of long term benefit to residents by providing energy efficient housing, a more dependable energy supply.
7. Promote high quality sustainable urban design	+	Environmental sustainability should form part of high quality sustainable design.
8. Ensure efficient use of land, buildings & infrastructure	N/A	No relationship.
9. Reduce reliance on private transport	N/A	Sustainable travel is covered by objectives 8-10 (see below).
10. Improve amenity, minimising noise impact	N/a	No relationship.
11. Water resources & flood risk	0+	Environmental sustainability considerations can include water resources and flood risk. This objective has been amended to refer to wider sustainability and the local environment (where it initially focused on energy). This is then picked up in section 3.5 of the EAP, which sets out detailed measures in relation to how sustainability of the local environment applies to flooding.
12. Protect & enhance habitats & biodiversity	0+	Environmental sustainability considerations can include habitats and biodiversity. This objective has been amended to refer to wider sustainability and the local environment (where it initially focused on energy). This is then picked up in section 3.5 of the EAP, which sets out detailed measures in relation to how sustainability of the local environment applies to habitats and biodiversity, including through improvements to existing and provision of new open spaces, and the installation of green and brown walls on buildings.
13. Reduce waste	0+	Environmentally sustainable development should address the approach taken to waste. However this is a borough wide issue that is already covered in the Camden Core Strategy and Development Policies.

Draft Strategic Objective	6. Creating sustainable development: To plan for carbon free sustainable development and a local low carbon energy network in Euston and enhance the quality and sustainability of the local environment.	
Sustainability Objectives	Score	Comment
14. Improve air quality	0+	Environmental sustainability considerations include air quality. This objective has been amended to refer to wider sustainability and the local environment (where it initially focused on energy). This is then picked up in section 3.5 of the EAP, which sets out detailed measures in relation to how sustainability of the local environment applies to air quality, including through the use of green infrastructure to mitigate air quality issues.
15. Provide for energy efficiency	++	Significant benefits through promoting sustainable design and construction and local energy networks, which is a highly efficient way of providing energy.
16. Minimise fossil fuel use, aggregates & non-renewables	++	Significant benefits through promoting sustainable design and construction and local energy networks.
Overall Social Impact	+	Benefits in terms of health and helping the vulnerable through the provision of more energy efficient homes and a more reliable and efficient long-term energy provision through the promotion of local energy networks. Emphasis on the quality of the local environment could also bring benefits in terms of air quality
Overall Environmental Impact	++	Strong environmental benefits, including in relation to reducing carbon emissions, with reference to quality and sustainability of the local environment linking to detailed policies around flood risk, air quality and biodiversity.
Overall Economic Impact	0	Overall neutral economic impact. Other objectives address economic issues.

Draft Strategic Objective	7. Improving the environment along Euston Road: To create new and improved crossing points across Euston Road and improve the pedestrian and cyclist experience through greening and measures to reduce air and noise pollution.	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	N/A	No relationship.
2. Promote a healthy, safe community	+	Addressing the environment along Euston Road could help to enhance health by addressing existing air quality issues where possible. Improved connections across Euston Road could also enhance community access to University College London facilities to the south.
3. Access to shops, facilities & open space	++	Addressing the barrier effect of Euston Road could bring significant benefits by enhancing access north and south of Euston road to shops, facilities and open spaces.
4. Tackle poverty & social exclusion	+	Addressing the barrier effect of Euston Road could help to better connect the deprived communities of Regent's Park and Somers town with Central London.
5. Sustainable economic growth & employment opportunity	++-	By addressing the barrier effect and poor public realm created by Euston Road, there is the potential to transform the public realm and significantly change the image of Euston, potentially allowing the area to attract more investment and jobs. It would need to be ensured that measures to improve crossings would not significantly harm the wider economic by undermining the ability to transport people and goods along this important east-west traffic corridor.
6. Maximise benefits of regeneration	+	Improved connections and an improved public realm along Euston Road could help to attract investment and jobs to the area as well as creating a significantly improved local environment and improving southward connections for deprived communities.
7. Promote high quality sustainable urban design	++	This objective aims provide a significantly improved public realm along Euston Road, which would create a setting that could support an improved relationship between new buildings and spaces.
8. Ensure	0+	No significant relationship. Improvements to north-south connections along Euston Road could help to support

Draft Strategic Objective	7. Improving the environment along Euston Road: To create new and improved crossing points across Euston Road and improve the pedestrian and cyclist experience through greening and measures to reduce air and noise pollution.	
efficient use of land, buildings & infrastructure		additional development in the area by enhancing connectivity.
9. Reduce reliance on private transport	++	An emphasis on improving the environment for pedestrians and cyclists could help to promote these more sustainable modes as an alternative to the car.
10. Improve amenity, minimising noise impact	0+	Euston Road is an identified DEFRA priority area due to noise generated by traffic. Improving the pedestrian and cyclist experience could help to address this, although there is a limit to the ability of the Euston Area Plan can itself solve this issue.
11. Water resources & flood risk	0	Unlikely to have a significant impact, as there are no significant flood risk issue identified along Euston Road.
12. Protect & enhance habitats & biodiversity	0+	Unlikely to have a significant impact on this, although the greening of the environment, if sought, could provide enhanced habitat.
13. Reduce waste	N/A	No relationship.
14. Improve air quality	+	Air quality is a major issue along Euston Road, and seeking to improve the pedestrian environment could help to address this. It should be noted that wider measures to address air quality on Euston Road would also be needed as it relates to traffic travelling through the area.
15. Provide for energy efficiency	N/A	No relationship.
16. Minimise fossil fuel use, aggregates & non-renewables	N/A	No relationship. Promoting walking and cycling could help to promote more sustainable travel modes.

Draft Strategic Objective	7. Improving the environment along Euston Road: To create new and improved crossing points across Euston Road and improve the pedestrian and cyclist experience through greening and measures to reduce air and noise pollution.	
Overall Social Impact	+	Positive social impacts by improving accessibility and improving connections for deprived communities at Regent's Park Estate and Somers Town with Central London.
Overall Environmental Impact	++	Strongly positive environmental impact through significant enhancements to the public realm and promotion of walking and cycling, as well as the potential to address air quality issues where possible.
Overall Economic Impact	++	Strongly positive economic impact by enhancing the image, attractiveness and function of the area, thus potentially attracting investment and jobs. This could be further enhanced by measures to address the bus station arrangement, which also serves the station area with Euston Road and Central London beyond. Care would need to be taken to ensure that measures to enhance pedestrian and cycling links across Euston Road would not significantly undermine the movement of people and goods east-west along Euston Road, as this could have an indirect negative economic impact.

Draft Strategic Objective	8. Promoting sustainable travel: To promote walking and cycling in the area, through encouraging improvements to the streets and enhancing facilities for pedestrians and cyclists and those using the station, along with existing and new residents and workers in the area.	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	N/A	No significant relationship.
2. Promote a healthy, safe community	++	Promoting walking and cycling would help to promote healthier lifestyles as well as enhancing access to facilities.
3. Access to shops, facilities & open space	++	Promoting walking and cycling, and improvements to streets and interchange facilities would have a significant positive for access to shops, facilities and open space.
4. Tackle poverty & social exclusion	+	Improvements to walking and cycling routes would help improve accessibility for deprived communities in the Euston area.
5. Sustainable	+	Enhancements to walking and cycling links to and through the area would be likely to enhance the function and

Draft Strategic Objective	8. Promoting sustainable travel: To promote walking and cycling in the area, through encouraging improvements to the streets and enhancing facilities for pedestrians and cyclists and those using the station, along with existing and new residents and workers in the area.	
Sustainability Objectives	Score	Comment
economic growth & employment opportunity		attractiveness of the area, potentially helping to attract investment. It would also help to support economic growth by ensuring that the area is accessible by a range of efficient transport means.
6. Maximise benefits of regeneration	+	Improvements to sustainable travel would enhance the ability of local communities to employment opportunities as well as enhancing the character and function of the Euston area.
7. Promote high quality sustainable urban design	0+	No direct relationship. The promotion of sustainable travel can help to provide an alternative to private vehicle use, thus helping to reduce the effect of traffic on the built environment.
8. Ensure efficient use of land, buildings & infrastructure	+	Promotion of sustainable travel options can help to ensure efficient use of land by ensuring development is supported by appropriate transport infrastructure.
9. Reduce reliance on private transport	++	Promotion of sustainable travel options plays a fundamental role in reducing reliance of public transport.
10. Improve amenity, minimising noise impact	+	Traffic can have negative impacts on amenity, for example in relation to noise. The promotion of alternatives to private vehicle use can help to address this.
11. Water resources & flood risk	N/A	No relationship.
12. Protect & enhance habitats & biodiversity	N/A	No relationship.
13. Reduce	N/A	No relationship.

Draft Strategic Objective	8. Promoting sustainable travel: To promote walking and cycling in the area, through encouraging improvements to the streets and enhancing facilities for pedestrians and cyclists and those using the station, along with existing and new residents and workers in the area.	
Sustainability Objectives	Score	Comment
waste		
14. Improve air quality	++	The promotion of sustainable travel provides alternatives to the use of private vehicles. This can help to reduce air pollution by fostering a reduction in traffic emissions.
15. Provide for energy efficiency	+	Sustainable travel provides a more energy efficient means of travel than private car use.
16. Minimise fossil fuel use, aggregates & non-renewables	++	The promotion of sustainable travel plays a crucial role in enabling a move towards transport patterns that involve less consumption of fossil fuels than the private car.
Overall Social Impact	++	The promotion of sustainable travel is likely to have strongly positive social benefits by helping to promote healthy lifestyles, improving access to facilities, and wider accessibility, including to employment opportunities.
Overall Environmental Impact	++	This objective would also be likely to have strongly positive environmental effects by reducing emissions, generating positive effects both in terms of climate change mitigation and air quality. It would also have positive effects by reducing noise and supporting efficient use of land through the provision of appropriate supporting infrastructure.
Overall Economic Impact	+	The promotion of sustainable travel would have a positive economic impact by improving accessibility to employment/ economic activities and helping to create a more attractive, less traffic-dominated environment.

Draft Strategic Objective	9. Enhancing existing public transport: To encourage improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	0+	No significant relationship. Enhancement of existing public transport provision could help to support additional development, including affordable housing provision.
2. Promote a healthy, safe community	0+	No significant relationship. Enhancements to existing transport services could contribute to safer communities by addressing existing issues relating to the current poor design of the station with blank station flanks and poorly configured bus interchange.
3. Access to shops, facilities & open space	+	Improvements to existing public transport infrastructure could help to improve access to shops, facilities and open space at a strategic level by increasing the capacity and/ or frequency of transport services.
4. Tackle poverty & social exclusion	+	Improved public transport infrastructure could help to address poverty and exclusion by enhancing access to employment opportunities and facilities.
5. Sustainable economic growth & employment opportunity	++	Enhancement of public transport capacity would be likely to play an important role in enabling economic growth y enhancing the capacity of frequency of services, thus supporting the development of additional business and other economic-related floorspace and making Euston a more attractive destination for investment.
6. Maximise benefits of regeneration	++	Improved public transport capacity plays an important role in enabling regeneration by supporting the delivery of additional homes, jobs, community facilities and other uses, as well as enhancing connectivity to employment and other opportunities.
7. Promote high quality sustainable urban design	+	Improved existing public transport infrastructure could include the redevelopment, reconfiguration or other alterations to existing buildings and facilities to create a more attractive built environment, including a more active and legible public realm.
8. Ensure efficient use of land, buildings & infrastructure	++	The enhancement of existing public transport is crucial in enabling the maximum appropriate use of land and buildings. New development needs to be supported by improvements to transport infrastructure.
9. Reduce reliance on private	++	The enhancement of existing public transport plays an important role in reducing the reliance on private transport by providing an alternative means of travel.

Draft Strategic Objective	9. Enhancing existing public transport: To encourage improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west	
Sustainability Objectives	Score	Comment
transport		
10. Improve amenity, minimising noise impact	+-	Enhancing existing public transport could help to improve amenity and reduce noise by enabling a reduction in traffic, and therefore traffic noise. However, public transport services, for example buses, can also create noise, which could impact on amenity if the level of service is increased. The proposed introduction of an ultra low emissions zone at Euston (see Sections 3.4 and 3.5 of the EAP) may help to mitigate this, as this designation could support improvements to public transport infrastructure, for example through the encouragement of modern, more quiet trains and buses to serve Euston in the future.
11. Water resources & flood risk	0+	No significant relationship. The reconfiguration or enhancement of public transport infrastructure could include measures to mitigate flood risk, which exists around the existing Euston Station site.
12. Protect & enhance habitats & biodiversity	0	No relationship.
13. Reduce waste	0	No relationship.
14. Improve air quality	+-	Enhancing existing public transport could help to improve air quality by enabling a reduction in traffic, and therefore traffic emissions. However, public transport services (in particular buses), can also generate significant emissions, which could impact on air quality. The proposed introduction of an ultra low emissions zone at Euston (see Sections 3.4 and 3.5 of the EAP) may help to mitigate this, as this designation could support improvements to public transport infrastructure, for example through the encouragement of modern, more sustainable buses to serve Euston in the future.
15. Provide for energy efficiency	+	Public transport is a more energy efficient means of travel than the use of private vehicles, and enhanced services would help to increase the use of more efficient transport modes. In addition, waste heat from public transport services (e.g. the London Underground) could be re-used to provide energy to heat surrounding buildings.
16. Minimise fossil fuel use, aggregates & non-renewables	++	Public transport modes use less fossil fuels than private vehicles. Enhancements to services would therefore promote more journeys by less resource-intensive modes.
Overall Social	+	Improved existing public transport would be likely to enhance access to facilities and employment opportunities,

Draft Strategic Objective	9. Enhancing existing public transport: To encourage improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west	
Sustainability Objectives	Score	Comment
Impact		as well as supporting the delivery of additional uses that would be socially beneficial, for example new homes and community facilities.
Overall Environmental Impact	++	Enhancing existing public transport would be likely to have a strongly positive overall environmental impact by providing an alternative to private vehicle use and therefore contributing towards a reduction of CO2 emissions. It would also enable development that makes more efficient use of land by supporting higher density development (where appropriate). Detailed policy would be likely to mitigate potential environmental impacts and provide additional environmental gains through the introduction of an Ultra Low Emissions Zone, which could help to reduce emissions and noise from buses and trains through the encouragement of a more sustainable fleet to serve Euston in the future.
Overall Economic Impact	++	Enhanced public transport would play an important role in enabling economic growth and regeneration by delivering the additional infrastructure required to support additional businesses and other uses.

Draft Strategic Objective	10. Planning for future public transport: To ensure that if a new station is developed, adequate improvements to the Underground services and new transport links, such as Crossrail 2, are provided to prevent congestion and overcrowding of the Underground trains.	
Sustainability Objectives	Score	Comment
1. High quality affordable housing	0+	No significant relationship. Additional public transport could help to support additional development, including affordable housing provision.
2. Promote a healthy, safe community	0+	No significant relationship. New transport links could provide new links between communities and enhance access to health facilities.
3. Access to shops, facilities & open space	+	Additional public transport infrastructure could help to improve access to shops, facilities and open space at a strategic level by providing new services that could increase capacity or provide connections to new places.
4. Tackle poverty & social exclusion	+	Additional public transport could help to address poverty and exclusion by enhancing access to employment opportunities and facilities by increasing capacity or providing connections to new places.
5. Sustainable economic growth & employment opportunity	++	Additional public transport would be likely to play an important role in enabling economic growth by providing links to new places, and therefore the potential attractiveness of Euston as a businesses destination to a range of employers and employees. Additional public transport would also help to support the development of additional business and other economic-related floorspace.
6. Maximise benefits of regeneration	++-	<p>Increased public transport links in the future would play an important role in enabling regeneration by supporting the delivery of additional homes, jobs, community facilities and other uses, as well as enhancing connectivity to employment and other opportunities.</p> <p>There could be negative side effects if the provision of new infrastructure were to impact on existing communities (for example through the loss of existing uses and buildings to allow the construction of transport infrastructure). Detailed policies in the EAP seek to minimise the impacts of new infrastructure, for example through the sensitive location of taxi and bus infrastructure and emphasising the need to minimise impacts of the construction of Crossrail 2 on Somers Town.</p>
7. Promote high quality sustainable	0	No significant relationship. It would need to be ensured that new infrastructure was designed to a high quality.

Draft Strategic Objective	10. Planning for future public transport: To ensure that if a new station is developed, adequate improvements to the Underground services and new transport links, such as Crossrail 2, are provided to prevent congestion and overcrowding of the Underground trains.	
Sustainability Objectives	Score	Comment
urban design		
8. Ensure efficient use of land, buildings & infrastructure	++	Increased public transport links would play an important role in enabling the maximum appropriate use of land and buildings. New development needs to be supported by improvements to transport infrastructure.
9. Reduce reliance on private transport	++	Increased public transport links plays an important role in reducing the reliance on private transport by providing additional capacity and connections to new places.
10. Improve amenity, minimising noise impact	0-	No significant relationship. New public transport links, for example buses, could help to reduce noise generated by private vehicle use. However public transport services themselves can create noise, which could impact on amenity if the level of service is increased. Noise impacts could be mitigated as through the provision of modern, quieter trains and buses to serve Euston in the future. The proposed introduction of an Ultra Low Emissions zone (see Sections 3.4 and 3.5) could help this.
11. Water resources & flood risk	0	No significant relationship. It would need to be ensured that new infrastructure was designed to address potential flooding issues.
12. Protect & enhance habitats & biodiversity	0	No relationship.
13. Reduce waste	0	No relationship.
14. Improve air quality	+-	New public transport links could help to improve air quality by enabling a reduction in traffic, and therefore traffic emissions. However, public transport services (in particular buses), can also generate significant emissions, which could impact on air quality. Air quality issues associated with public transport services could be mitigated through the encouragement of modern, more sustainable buses to serve Euston in the future. The proposed introduction of an Ultra Low Emissions zone (see Sections 3.4 and 3.5) could help this.

Draft Strategic Objective	10. Planning for future public transport: To ensure that if a new station is developed, adequate improvements to the Underground services and new transport links, such as Crossrail 2, are provided to prevent congestion and overcrowding of the Underground trains.	
Sustainability Objectives	Score	Comment
15. Provide for energy efficiency	+	Public transport is a more energy efficient means of travel than the use of private vehicles, and new public transport links would help to increase the use of more efficient transport modes. In addition, waste heat from public transport services (e.g. Crossrail 2) could be re-used to provide energy to heat surrounding buildings.
16. Minimise fossil fuel use, aggregates & non-renewables	++	Public transport modes use less fossil fuels than private vehicles. New public transport links would therefore promote more journeys by less resource-intensive modes.
Overall Social Impact	+	New public transport links would be likely to enhance access to facilities and employment opportunities, as well as supporting the delivery of additional uses that would be socially beneficial, for example new homes and community facilities.
Overall Environmental Impact	++	New public transport links would be likely to have a strongly positive overall environmental impact by providing an alternative to private vehicle use and therefore contributing towards a reduction of CO2 emissions. It would also enable development that makes more efficient use of land by supporting higher density development (where appropriate). Further environmental benefits could be gained by reducing emissions and noise from buses and trains through the encouragement of a more sustainable fleet to serve Euston. The proposed introduction of an Ultra Low Emissions zone (see Sections 3.4 and 3.5) could help this.
Overall Economic Impact	++	New public transport links would play an important role in enabling economic growth and regeneration by delivering connections to new places that would widen the attractiveness of the area to investors, businesses and employees. They would also provide the additional infrastructure required to support growth in business floorspace and other uses.

APPENDIX D

Main Policy Alternatives Appraisal

Appendix D Main policy alternatives

This appendix provides an appraisal of the main policy alternatives considered in the production of the Euston Area Plan, and should be read in conjunction with section 6 of the main Sustainability Appraisal Report, which provides an appraisal of the higher level strategic options considered for the EAP. Section 7 of the main Report provides an appraisal of the proposed strategic and development principles.

Key: Attributing effects	
++	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

Section 3 Development Strategy

Strategy principle EAP1 Land Use Strategy

Main policy alternatives

- *Land use Alternative SP1.1: Do not seek to promote a knowledge quarter/ research based and creative uses*

Sustainability Objectives	Land use Alternative 1.1
1. To promote the provision of a range of high quality and affordable housing to meet local needs	+
2. To promote a healthy and safe community	0
3. To ensure access to local shopping, community, leisure facilities and open space	0
4. To tackle poverty, social exclusion and promote equal opportunities	+ -
5. To encourage and accommodate sustainable economic growth and employment opportunities	-
6. To maximise the benefits of regeneration and development to promote sustainable communities	?
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	0
8. To ensure new development makes efficient use of land, buildings and infrastructure	0
9. To reduce reliance on private motorised transport	?

10. To improve amenity by minimising the impacts associated with noise	0
11. To protect and manage water resources and reduce flood risk	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0
13. To reduce the amount of waste requiring final disposal	0
14. To improve air quality	0
15. To provide for the efficient use of energy.	
16. To minimise the use of non-renewable resources	0

Commentary

Land use Alternative SP1.1 (Do not seek to promote a knowledge quarter/ research based and creative uses) could generate positive outcomes by allowing more delivery of Grade A office space, which is likely to provide the highest value land use at Euston. However, this approach may provide significantly fewer wider economic benefits, given the potential significant contribution that knowledge-based uses at Euston could make to the London and national economy. It would also fail to take advantage to make the most out of the full regeneration benefits at Euston, compared to the current approach which seeks to build on the existing character and economic clusters in the area to generate a distinctive knowledge cluster. The encouragement of a wider range of knowledge and research uses alongside other employment uses would generate a wider range of job opportunities, which could provide benefits in terms of widening opportunities for local people.

Strategy principle EAP2 Urban design strategy – no main alternative options

Strategy principle EAP3 Transport Strategy

SP3.1 Euston station bus provision options (being considered by Camden and TfL):

Option 1a. Retain or re-provide existing bus station

Option 1b. Re-provide bus facility

Option 1c. East-west bus street

Option 1d. Relocate buses to existing road network

SP3.2 Alternative options for taxi provision:

3.2a. Increased provision (promote additional taxi use)

3.2b. Reduced provision (seek to prevent additional taxi use)

Sustainability Objectives	TS option SP3.1 a	TS option SP3.1 b	TS option SP3.1 c	TS option SP3.1d	TS Alternative SP3.2a	TS Alternative SP3.2b
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	0	0	?	0	0
2. To promote a healthy and safe community	--	-	+	+	-	-
3. To ensure access to local shopping, community, leisure facilities and open space	--	-	+/-	+	-	?

4. To tackle poverty, social exclusion and promote equal opportunities	0	0	0	0	0	0
5. To encourage and accommodate sustainable economic growth and employment opportunities	--	-	+	++	?	?
6. To maximise the benefits of regeneration and development to promote sustainable communities	--	--	+	+?	-	?
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	--	-	+?	+	-	?
8. To ensure new development makes efficient use of land, buildings and infrastructure	--	--	+?	+?	-	+
9. To reduce reliance on private motorised transport	-	+	+	+?	--	+
10. To improve amenity by minimising the impacts associated with noise	-	-	+	+	?-	?-
11. To protect and manage water resources and reduce flood risk	0	0	0	0	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	-	-	+	+	-	?
13. To reduce the amount of waste requiring final disposal	0	0	0	0	0	0
14. To improve air quality	-	-	+	+	?-	?
15. To provide for the efficient use of energy.	--	-	-	+	-	?-
16. To minimise the use of non-renewable resources	0	0	0	0	?	?

Option SP3.1a (Retain or re-provide existing bus station) is rated negatively in this assessment. The arrangement of the existing bus facility, guard railing and surrounding urban realm creates a poor quality environment for waiting passengers and a high degree of severance for people attempting to walk through the area. The limited pedestrian crossing options create the potential for conflict between buses and pedestrians, generating negative impacts in terms of safety.

The layout of the buildings and bus station also detracts from the function, image and attractiveness of the station area, reducing its economic potential and the potential benefits from regenerating the site. It creates a poor public realm that has a harmful contribution to the surrounding heritage assets, and reduced potential development land in that part of the site.

The current bus facility also creates noise and air pollution and negative impacts on Euston Square Gardens and any associated biodiversity. It is at capacity and will not be able to meet any future increase in demand.

Option SP3.1b (Re-provide bus facility) would be likely to generate a number of negative sustainability impacts. The space required for re-providing a bus station will reduce the amount of land available for regenerating the site. A bus facility layout based on the existing facility will result in a large number of buses turning, stopping

and standing in front of the station. This level of activity would continue to raise issues in terms of potential for severance for pedestrians and cyclists wishing to access the station. The re-provision of a bus station in this location would also continue to impact negatively on the image and attractiveness of the station site as an investment and regeneration location.

However, by re-designing the layout of the bus station it would be possible to introduce additional pedestrian crossings on key desire lines and therefore reduce the severance impact compared to the existing facility. Whilst failing to address the wider underlying issues caused by bus stations in urban design terms, comprehensive re-design of the front of the station which includes a re-designed bus station could provide an improved urban realm and setting for Euston Station compared to the existing situation.

Option SP3.1c (*East-west bus street*) would generate a range of positive sustainability impacts by removing the current bus station arrangement. By re-providing the bus facility as an east-west bus street north of Euston Square Gardens it would be possible to maintain the functionality provided by the existing facility. Terminating buses would still be able to turn and stand and buses would use common stops. The longer thinner arrangement would also enable dramatically enhanced pedestrian crossings and would therefore reduce the severance effect compared with the existing facility. A comprehensive re-design of the front of the station which included a re-designed bus station could provide a much higher quality urban realm and improved setting for Euston Station which would contribute to the economic attractiveness and competitiveness of the Euston area.

Whilst this arrangement could provide some urban design benefits, it could also provide disbenefits, as it may still affect (and possibly require the loss of part of) Euston Square Gardens open space and would still require buses to run in front of the station area. In addition, while this option would increase the potential for over site development south of Euston Station, it would also lead to some reduction in capacity to allow for the introduction of the bus street.

Option SP3.1d (*Relocate buses to existing road network*) would be likely to generate a range of positive sustainability impacts, whilst also raising some transport issues. This option would remove buses from the station site and therefore minimise the impact of bus movements on the public realm immediately in front of the station, on pedestrian movement and on Euston Square Gardens open space.

It would also allow the most to be made of development opportunities on the Euston Station site, and improve the image and attractiveness of the site, with consequent benefits in terms of economic growth and investment. However, this option would require bus turning and standing space to be provided elsewhere which could have an impact on development opportunities.

Option 3.1d would generate a negative impact by placing bus stops further from the station entrance/ exit, thus potentially reducing the effectiveness of interchange. It would also result in a significant increase in bus mileage and would provide lower levels of legibility for passengers as a result of buses no longer being able to use common stops. It would also reduce capacity for traffic on Euston Road, leading to delays and possible dispersion of traffic onto surrounding local roads.

Option SP3.2a (*Increased provision - promote additional taxi use*) would have a significant negative impact by reducing promoting private motorised transport, instead of more sustainable and efficient travel modes. It may also generate

negative impacts in terms of safety and accessibility due to potential conflict between increased volumes of taxis and pedestrians. It could also generate negative impacts in terms of regeneration and urban design as large numbers of taxis would detract from the street scene and attractiveness of the area. Promoting additional taxi provision could lead to additional air quality and noise issues associated with additional traffic movements, although the potential introduction of an ultra low emissions zone at Euston could serve to mitigate these impacts. Promoting additional taxis would lead to an inefficient use of energy compared to more efficient public transport modes. Promotion of taxis would represent an inefficient use of energy, compared to public transport modes. Providing the potential negative impacts are managed and mitigated as far as is possible then promoting additional taxi provision could support economic growth by providing a transport service that business travellers may want.

Option SP3.2b (Reduced provision - seek to prevent additional taxi use) could result in negative impacts due to potential knock-on effects in terms of unauthorised taxi movements. The management of wider taxi movements is a matter beyond the remit of the Euston Area Plan, however under-providing for taxis and private hire vehicles could result in increasing unplanned, unmanaged taxi movements across the wider area. This could have negative implications in relation to safety, and would lead to unknown impacts in relation to a range of factors including noise (with the potential of unauthorised taxi movements in more noise-sensitive locations) and the local environment.

Strategy principle EAP4 Environment and open space strategy

- **Alternative SP4.1: Do not seek an ultra low emissions zone at Euston**
- **Alternative SP4.2: Do not specify energy centre locations/ local energy network potential**

Sustainability Objectives	E&OS alt SP4.2	E&OS alt SP4.3
1. To promote the provision of a range of high quality and affordable housing to meet local needs	-	?-
2. To promote a healthy and safe community	--	?+
3. To ensure access to local shopping, community, leisure facilities and open space	0	0
4. To tackle poverty, social exclusion and promote equal opportunities	-	-
5. To encourage and accommodate sustainable economic growth and employment opportunities	-+	?-
6. To maximise the benefits of regeneration and development to promote sustainable communities	-	-
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	-	0
8. To ensure new development makes efficient use of land, buildings and infrastructure	0	-

9. To reduce reliance on private motorised transport	-	0
10. To improve amenity by minimising the impacts associated with noise	--	0
11. To protect and manage water resources and reduce flood risk	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	-	0
13. To reduce the amount of waste requiring final disposal	0	0
14. To improve air quality	--	?+
15. To provide for the efficient use of energy.	-	--
16. To minimise the use of non-renewable resources	--	?-

Alternative SP4.1 (Do not seek an ultra low emissions zone at Euston) would be likely to have a range of significant negative impacts. This approach would mean that additional transport movements and growth would take place without the measures necessary to mitigate the emissions generated, including in relation to noise and air pollution. This would impact on health, in an area that already suffers from comparatively poor health levels. This approach would also fail to take advantage of the potential to promote the use of non-renewable resources and energy efficient design. It could also affect the potential for housing on sites where current emissions would render sites unsuitable, and would fail to take advantage of the opportunity to enhance biodiversity and the public realm through the creation of a cleaner environment. This option could generate positive economic impacts by reducing burdens on transport providers and developers, but could also generate negative economic impacts due to the impacts of increased emissions on the attractiveness and quality of the environment in the area.

Alternative SP4.2 (Do not specify energy centre locations/ local energy network potential) would be likely to have a significant negative impact in relation to the need to make efficient use of energy, and may reduce the potential for renewable energy generation, depending on advancements in fuel technology for local energy networks in the next few years. In failing to provide for this highly efficient form of energy, it may also fail to address fuel poverty, and would not allow for the most efficient possible use of energy infrastructure.

It is unclear whether this option would have negative impacts on housing and economic growth. Although this option would reduce infrastructure provision available to support new housing and jobs, it may help deliverability by reducing requirements on development. Ensuring that the draft EAP wording requires contributions towards a local energy network should be provided *where viable* would enable development to remain viable whilst still delivering efficient energy provision.

Local energy networks can raise air quality (and therefore health) issues, and this alternative would remove this impact. The draft EAP could therefore ensure that any local energy network is designed, fuelled and managed in a way that does not cause harm in relation to air quality.

Section 4 Character areas

Development Principle EAP1 Euston Station and EAP2 Tracks/ North Euston Cutting

- *Alternative DP1.1: Seek a higher proportion of housing (in line with Policy DP1 of the Camden Development Policies) on the Euston Station and Tracks site.*
- *Alternative DP1.2: Do not provide an open space on a deck over the railway tracks to the north of North Euston Cutting*
- *Alternative DP1.3: Allow station development and over-site development to happen organically, rather than taking a comprehensive approach*
- *Alternative DP1.4: Leave the development at the front of the station/ forecourt in its current form*
- *Alternative DP1.5: Leave the eastern (Eversholt Street) flank of Euston Station in its current form*

Sustainability Objectives	ES&T/ PV Alt DP1.1	ES&T/ PV Alt DP1.2	ES&T/ PV Alt DP1.3	ES&T/ PV Alt DP1.4	ES&T/ PV Alt DP1.5
1. To promote the provision of a range of high quality and affordable housing to meet local needs	?--	0	-	0	0
2. To promote a healthy and safe community	?-	--	?	?	--
3. To ensure access to local shopping, community, leisure facilities and open space	0	--	-	-	--
4. To tackle poverty, social exclusion and promote equal opportunities	0	-	-	0	-
5. To encourage and accommodate sustainable economic growth and employment opportunities	--	0	-	--	--
6. To maximise the benefits of regeneration and development to promote sustainable communities	?-	-	-	--	--
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	-	-	-	--	--
8. To ensure new development makes efficient use of land, buildings and infrastructure	0	--	-	-	--
9. To reduce reliance on private motorised transport	-	+	-	0	-+
10. To improve amenity by minimising the impacts associated with noise	?-	-	-	0	0
11. To protect and manage water resources and reduce flood risk	0	-	-	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0	--	-	0	0

13. To reduce the amount of waste requiring final disposal	0	0	0	+	+
14. To improve air quality	?-	-	-	-	0
15. To provide for the efficient use of energy	0	0	-	-	0
16. To minimise the use of non-renewable resources	0	0	-	-	0

Alternative DP1.1 (Seek a higher proportion of housing [in line with Policy DP1 of the Camden Development Policies] on the Euston Station and Tracks site [this option would involve separate consideration of Euston station and Tracks and North Euston Cutting sites]). Viability advice indicated that this option may affect the overall viability of the Euston Station and Tracks/ North Euston Cutting scheme. Initial high level viability testing suggests that development at North Euston Cutting could be feasible, but more detailed information on decking costs will be required. If North Euston Cutting is not delivered this could lead to a net reduction in housing delivery as most of the new housing in the plan area is delivered here. Other implications of this option are not entirely clear, although it would appear that it may be challenging to provide a high quality workable residential environment in some locations above the station, given the various constraints on the site, including lack of ground floor accessibility to the upper levels and a surrounding environment that does not naturally lend itself to the creation of a high quality housing or a sustainable residential community. A stronger emphasis on housing delivery on the station site may lead to negative impacts including locating sensitive residential uses in areas of higher noise levels and, potentially, lower air quality. It would also fail to take advantage of the major economic opportunities on the station site. It would therefore appear that this option would have less sustainability benefits than the draft EAP approach, assuming the Euston Station and Tracks site and North Euston Cutting are taken forward together to ensure an appropriate balance between residential, economic and other uses.

If North Euston Cutting were not to come forward for development (i.e. Euston Station and Tracks were to be taken forward on its own), this option may become comparatively more sustainable as it would ensure an appropriate balance between housing and employment uses (if a satisfactory residential environment can be ensured).

Alternative DP1.2 (Do not provide an open space on a deck over the railway tracks to the north of North Euston Cutting): the draft Sustainability Appraisal (July 2013) demonstrated the significant social and environmental sustainability benefits of providing open space above a deck over the railway to the north of the North Euston Cutting, but highlighted potential funding issues in relation to its delivery. However, whilst potential delivery options would need to be taken into account in drafting policy, increased development capacity identified in the proposed submission EAP would suggest an increased need for open space to meet additional demand, and may enhance financial viability. The option not to include such a deck would itself raise sustainability issues. It would have fail to deliver potential positive impacts in terms of ensuring access to open space, and enhancing wider accessibility through new connections across the railway tracks, and associated public realm, local environment, air quality and biodiversity gains. The need for enhancing open space provision would become even more important if the higher end of the capacities for new homes and jobs indicated in the EAP are proposed, which would create greater pressure for the provision of this larger pen space. Therefore this option would raise sustainability issues, although policy wording would need to take into account cost and funding issues, and the EAP should include other

measures to ensure open space provision to mitigate the open space impacts of HS2 and development.

Alternative DP1.3 (Allow station development and over-site development to happen organically, rather than taking a comprehensive approach): this approach would involve considering the HS2 station separately from the Network Rail station, and from over-station development, involving more piecemeal approach to delivery. It would be likely to have a range of significant negative impacts, when compared to the proposed comprehensive approach. A failure to consider how the HS2 and National Rail station should be taken forward, along with the above station development across the station and tracks site, would be likely to lead to:

- A failure to ensure that over station development can make full use of the potential housing, economic and regeneration benefits, both in terms of the level of development provided, and in terms of quality;
- Significant potential for inefficient use of the site, creating a disjointed place where buildings do not relate appropriately to each other;
- A failure to ensure that appropriate social benefits are provided, including providing opportunities for local deprived communities to benefit from economic growth
- Failure to take a planned approach to ensuring that development can provide appropriate mitigation, and ensure land uses are located appropriately, in relation to noise, air pollution and flood risk;
- Failure to plan properly for onward movement of rail passengers, visitor, workers and residents, and failure to plan early for the provision of effective and sustainable energy infrastructure.

The baseline or Option B1 station response master plans would enable a more comprehensive approach by ensuring that the whole station site can be designed and taken forward in a coordinated manner.

Alternative DP1.4 (Leave the development at the front of the station/ forecourt in its current form). It would be possible to develop the land over the existing station without developing the existing buildings in the forecourt area. This option may be easier to deliver as the buildings are in leasehold ownership privately, in contrast to the publicly owned Network Rail/ DfT land behind. The appraisal indicates that this option would be likely to generate a number of negative sustainability impacts when considered against the SA criteria:

- The current layout has significant negative impacts in terms of economic growth and regeneration by failing to change the current poor quality buildings which detract from the area and image of the area affecting the investment potential of the area.
- Significant negative urban design implications by retaining the current poor quality façade, which is highly prominent, as well being in a historically sensitive location facing onto Euston Square Gardens.
- The forecourt area and buildings currently act as a partial barrier to accessibility, movement and legibility, which would be continued under this option.
- More effective use could be made of this land both in terms of density and value
- Failure to take opportunities to provide a greener environment
- Continued use of an outdated building which is unlikely to be as energy efficient as a new building, and unlikely to have the same potential for renewable energy use.

However, this option would be likely to generate a positive sustainability outcome by reducing the amount of waste going to landfill, compared to an option that would involve demolition and redevelopment.

Alternative DP1.5 (Leave the eastern (Eversholt Street) flank of Euston Station in its current form)

It may be possible to develop some land over the existing station without the removal of the two eastern Network Rail platforms to create active ground floor frontages in the eastern flank of Euston Station. This option may be easier to deliver and would remove potential inconvenience or disruption to Network Rail. However, the assessment indicates that it would be likely to have a number of significant negative sustainability impacts:

- Failure to address current blank station wall frontage, which reduces overlooking and perceptions of safety along Eversholt Street
- Failure to take advantage of opportunities to provide new uses could provide additional amenities for local people
- Failure to make the most of opportunities to deliver regeneration and economic growth and make efficient use of land through development for active uses.

This option may deter walking as an alternative to the car due to the current negative street environment. However, it may be more positive compared to the preferred approach taken in relation to rail travel, as it would not involve the loss of any Network Rail platforms.

This option would be likely to generate a positive sustainability outcome by reducing the amount of waste going to landfill, compared to an option that would involve demolition of existing platforms

Development Principle EAP3 Euston Road

- **Alternative DP3.1: More stringent in relation to reducing traffic as part of enhancing the environment for pedestrians and cyclists**
- **Alternative DP3.2: Do not seek to redress the balance between motorised transport and walking/ cycling along Euston Road**

Sustainability Objectives	Alternative DP3.1	Alternative DP3.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	0
2. To promote a healthy and safe community	++-	--
3. To ensure access to local shopping, community, leisure facilities and open space	++	--
4. To tackle poverty, social exclusion and promote equal opportunities	+	-
5. To encourage and accommodate sustainable economic growth and employment opportunities	++-	--+
6. To maximise the benefits of regeneration and development to promote sustainable	+	-

communities		
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	++	--
8. To ensure new development makes efficient use of land, buildings and infrastructure	0	0
9. To reduce reliance on private motorised transport	++-	--+
10. To improve amenity by minimising the impacts associated with noise	++	--
11. To protect and manage water resources and reduce flood risk	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0	0
13. To reduce the amount of waste requiring final disposal	0	0
14. To improve air quality	++	--
15. To provide for the efficient use of energy.	0	0
16. To minimise the use of non-renewable resources	0	0

Alternative DP3.1 More stringent in relation to reducing traffic as part of enhancing the environment for pedestrians and cyclists: This alternative would be likely to generate significant positive sustainability outcomes in relation to urban design by reducing traffic dominance, enhancing the public realm and the setting of heritage assets, including listed buildings. Reduced traffic dominance would also be likely to improve access to facilities, and to help reduce noise and air pollution from vehicles. Enhance pedestrian accessibility and public realm would also be likely to generate positive impacts in relation to poverty/ exclusion and regeneration.

This alternative would also be likely to generate both positive and negative outcomes against some sustainability indicators. In relation to health and safety, reduced traffic dominance could enhance the safety of pedestrians and cyclists, as well as improving air quality. However, if there were still strong demands on Euston Road from vehicles, this could create potential conflict, depending on detailed design. This alternative would be likely to generate economic growth benefits by enhancing the appearance and function of the Euston area, but may also lead to negative wider impacts on the economy by reducing the capacity of the road for economy-related journeys. In relation to private motorised transport, whilst this alternative would be likely to be positive outcomes by promoting walking and cycling, reduced road capacity would be likely to affect bus movement along Euston Road.

Alternative DP3.2 Do not seek to redress the balance between motorised transport and walking/ cycling along Euston Road: This alternative would be likely to generate significant negative sustainability outcomes in relation to urban design by failing to address traffic dominance and public realm issues. A failure to address traffic dominance would mean that Euston Road would continue to act as a barrier for communities either side of the road, and current noise and air pollution problems would remain.

This alternative would also be likely to generate both positive and negative outcomes against some sustainability indicators. In relation to health and safety, reduced traffic dominance could enhance the safety of pedestrians and cyclists, as well as improving air

quality. However, if there were still strong demands on Euston Road from vehicles, this could create potential conflict, depending on detailed design. This alternative would be likely to generate economic growth benefits by enhancing the appearance and function of the Euston area, but may also lead to negative wider impacts on the economy by reducing the capacity of the road for economy-related journeys. In relation to reducing reliance of private motorised transport, whilst this alternative would be likely to be positive outcomes by promoting walking and cycling, reduced road capacity may affect bus movement along Euston Road.

The full range of impacts relating to the main bus provision options would need to be modelled more closely in order to inform detailed decision making.

Development Principle EAP4 Drummond Street/ Hampstead Road

- **Alternative DP4.1: Do not create a 'no through traffic' area around Drummond Street**
- **Alternative DP4.2: Redevelop Maria Fidelis school site for alternative uses (not open space)**

Sustainability Objectives	Options	DS/HR Alternative DP4.1	DS/HR Alternative DP4.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0	+-
2. To promote a healthy and safe community		-	-
3. To ensure access to local shopping, community, leisure facilities and open space		-	--
4. To tackle poverty, social exclusion and promote equal opportunities		-	-
5. To encourage and accommodate sustainable economic growth and employment opportunities		--	+-
6. To maximise the benefits of regeneration and development to promote sustainable communities		--	--
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		-	-
8. To ensure new development makes efficient use of land, buildings and infrastructure		0	+-
9. To reduce reliance on private motorised transport		-	0
10. To improve amenity by minimising the impacts associated with noise		--?	0
11. To protect and manage water resources and reduce flood risk		0	--
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		0	--

13. To reduce the amount of waste requiring final disposal	0	0
14. To improve air quality	--?	--
15. To provide for the efficient use of energy.	?	0
16. To minimise the use of non-renewable resources	0	0

Alternative DP4.1 Do not create a 'no through traffic' area around Drummond Street

Given the potential increase in traffic levels in the Euston area following the arrival of HS2, vehicular movements through the area could have a significant impact on the Drummond Street area. Significant negative sustainability impacts identified against the SA criteria are:

- Economic growth and employment: traffic dominance could have a significant impacts on the Drummond Street neighbourhood centre and its local businesses
- Regeneration and sustainable communities: a potential significant rise in traffic levels could start to create a separation between the two sides of the street and consequently have an impact on the role of the street as a key hub of local activity
- Noise and air quality: increases in traffic could generate noise and air pollution from vehicles, although the designation of Euston as an ultra low emissions zone could reduce this potential impact

Other potential negative impacts include:

- Healthy and safe communities: extra traffic could lead to conflict between pedestrians and vehicles, with consequent implications for safety.
- There may be some impact on accessibility due to increased traffic levels
- The quality of the local environment may be reduced due to increased vehicular movement
- This option would provide for private vehicle movements at the likely expense of other road users.

Alternative DP4.2 Redevelop Retain Maria Fidelis school site for alternative uses (not open space)

The loss of this potential open space site would mean a failure to re-provide the open space to be lost at the adjacent St James's Gardens and Hampstead Road open space as a result of HS2. This would lead to a shortfall in the area.

This option could contribute to housing and jobs growth by delivering new mixed uses. However, it would contribute to a shortage of open space in the area, when net additional space is required to support housing and jobs growth, to ensure the creation of a high quality residential environment for new homes and ensure an attractive local environment to attract investment. Therefore this option would generate both positive and negative impacts in relation to housing and the economy/employment.

This option would also generate strong negative impacts in relation to:

- Access to open space, with the loss of a potential open space floorspace that is needed not only to support growth but also to replace open space lost as a result of HS2
- A net loss of open space in this urban area would be likely to have strongly negative implications in terms of regeneration and the creation of sustainable communities
- Loss of (and failure to replace) an SINC meaning loss of biodiversity, as well as loss of greenery that can contribute to addressing air quality and flood risk.

The failure to re-provide open space in this area would also lead to negative health implications in terms of health (exercise, well-being and air quality mitigation), in an area that suffers from deprivation and health issues. It would also be likely to have a negative impact in terms of urban design and the quality of the local environment removing an appropriate location for the re-provision of listed structures in St James's Gardens and green space that makes a positive contribution to the character of an area.

However, if Euston Station were to be redeveloped on its own footprint, this option would not raise the same sustainability issues as the requirement to re-provide St James's Gardens would fall away. In this instance, the negative impacts of this alternative would be reduced and it may generate positive outcomes by delivering new mixed uses in a sustainable location (subject to satisfactory relocation of the existing school use).

Development Principle EAP5 Regent's Park Estate

- **Alternative DP5.1: Do not seek to address routes through Regent's Park Estate?**
- **Alternative DP5.2: Less growth and change on Regent's Park Estate**
- **Alternative DP5.3: More growth and change at Regent's Park Estate**

Sustainability Objectives	Options	RPE alternative DP5	RPE alternative DP5	RPE alternative DP5
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0	-	+/-
2. To promote a healthy and safe community		-	-	?
3. To ensure access to local shopping, community, leisure facilities and open space		-	0	0
4. To tackle poverty, social exclusion and promote equal opportunities		-	-	+/-
5. To encourage and accommodate sustainable economic growth and employment opportunities		0	0	0
6. To maximise the benefits of regeneration and development to promote sustainable communities		-	-	-
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		-	-	+/-

8. To ensure new development makes efficient use of land, buildings and infrastructure	-	-	+
9. To reduce reliance on private motorised transport	-	-	+
10. To improve amenity by minimising the impacts associated with noise	+/-	0	0
11. To protect and manage water resources and reduce flood risk	0	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0	0	?
13. To reduce the amount of waste requiring final disposal	0	+	-
14. To improve air quality	0	0	0
15. To provide for the efficient use of energy.	0	-	+
16. To minimise the use of non-renewable resources	0	0	0

Alternative DP5.1 Do not seek to address routes through Regent's Park Estate would be likely to generate a number of negative outcomes when compared to the preferred approach. Not addressing routes through the estate would mean that existing accessibility and legibility issues remain. Some routes currently experience limited overlooking, compromising pedestrian safety. The current layout creates towards a disjointed urban form in some places which reduces the quality of the public realm and the efficiency of the urban layout. These issues would not be addressed under this option.

There may be some benefit from this option in terms of noise generation, improved legibility of the road network leads to an increase in traffic through the residential estate. However, the improvement of (and an emphasis on) pedestrian and cycling links and the public realm could also serve to reduce car use in the area.

Alternative DP5.2 Less growth and change on Regent's Park Estate would generate a negative impact in relation to housing as it would result in the delivery of less homes, including affordable homes, which are needed to meet needs and, potentially, to re-house residents who lose their homes as a result of HS2. This option would also reduce the potential for new infill to provide greater overlooking of the public realm, thus failing to take opportunities to enhance community safety. New development and infill could be used to enhance the legibility of the estate, creating a safer and higher quality public realm, thus increasing the benefits of regeneration and delivering urban design benefits: this option would fail to achieve this, instead retaining the current issues in relation to public realm. This option would also fail to ensure efficient use of land in an area with good public transport links, which is well placed to support a local energy network.

Less redevelopment would be likely to have a positive sustainability impact by reducing the amount of demolition work, thus reducing the amount of material taken to landfill.

Alternative DP5.3: More growth and change at Regent's Park Estate Positive impacts could include making more efficient use of land through creating higher densities of housing, in an area with good public transport connections, and

with good potential to support a local energy network. More growth and change could also enable enhanced connectivity and legibility through the area.

This option may potentially deliver sustainability benefits through the delivery of additional housing, including affordable housing for those in need, as well as offering greater opportunities to improve the urban fabric of the area. However, depending on the approach taken, significant levels of intervention may begin to harm the quality of the residential environment, community cohesion and the built fabric in the area, with potential increases in the level of disruption on the community.

Development Principle EAP6: Ampthill and Mornington Crescent

- *Alternative DP6.1: Less growth and change on Ampthill*
- *Alternative DP6.2: More growth and change on Ampthill*

Sustainability Objectives	Options	A/MC alt DP6.1	A/MC alt DP6.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs		-	+?
2. To promote a healthy and safe community		-	?
3. To ensure access to local shopping, community, leisure facilities and open space		-	0
4. To tackle poverty, social exclusion and promote equal opportunities		-	+/-
5. To encourage and accommodate sustainable economic growth and employment opportunities		0	0
6. To maximise the benefits of regeneration and development to promote sustainable communities		-	+/-
7. To promote high quality and sustainable urban design which protects and enhances the historic environment		--	+/-
8. To ensure new development makes efficient use of land, buildings and infrastructure		-	+
9. To reduce reliance on private motorised transport		-	+
10. To improve amenity by minimising the impacts associated with noise		+?	?
11. To protect and manage water resources and reduce flood risk		0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible		0	?
13. To reduce the amount of waste requiring final disposal		0	-
14. To improve air quality		0	0
15. To provide for the efficient use of energy.		0	+

16. To minimise the use of non-renewable resources	0	0
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Alternative DP6.1 (*Less growth and change on Ampthill*) would fail to take opportunities to make better use of under-utilised land to provide additional housing, or to address existing issues relating to the layout and form of the estate, which impacts on the quality of the local environment, accessibility through the area, overlooking, and the safety of the public realm and designated public open space. It may generate a benefit in relation to noise impacts as it would avoid providing additional housing next to the railway line and reduce impacts on existing communities.

Alternative DP6.2 *More growth and change on Ampthill*

Positive impacts could include making more efficient use of land through creating higher densities of housing, in an area with good public transport connections. Greater intervention would also provide the potential to further increase the accessibility and legibility of the estate.

However, depending on the approach taken, additional levels of intervention may begin to harm the quality of the residential environment and the built fabric, with potential increases in the level of disruption on the community.

Development Principle EAP7: West Somers Town

- ***Alternative DP7.1: Do not seek to identify intensification opportunities at Churchway***
- ***Alternative DP7.2: Do not include the relocation of Maria Fidelis Lower School on the Drummond Street site (redevelop for other uses such as housing)***

Sustainability Objectives	WST alternative DP7.1	WST alternative DP7.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs	-	+
2. To promote a healthy and safe community	0?	0
3. To ensure access to local shopping, community, leisure facilities and open space	0	--
4. To tackle poverty, social exclusion and promote equal opportunities	-	-
5. To encourage and accommodate sustainable economic growth and employment opportunities	0	0
6. To maximise the benefits of regeneration and development to promote sustainable communities	-	--
7. To promote high quality and sustainable urban design which protects and enhances the historic environment	-	0
8. To ensure new development makes efficient use of land, buildings and infrastructure	-	0
9. To reduce reliance on private motorised	-	0

transport		
10. To improve amenity by minimising the impacts associated with noise	0	--
11. To protect and manage water resources and reduce flood risk	0	0
12. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible	0	0
13. To reduce the amount of waste requiring final disposal	+	0
14. To improve air quality	0	0
15. To provide for the efficient use of energy.	-	0
16. To minimise the use of non-renewable resources	-	0

Alternative DP7.1 Do not seek to identify intensification opportunities at Churchway

This would result in negative sustainability results compared with the draft EAP approach as it would not provide opportunities to consider delivering additional housing to meet needs and fail to make the most efficient possible use of land in a location with excellent public transport links. Intensification/renewal of the site in consultation with the local community could deliver a development of higher urban design and environmental quality, this option would not achieve these benefits. However this option would reduce the amount of construction materials sent to landfill.

Alternative DP7.2 Do not include the relocation of Maria Fidelis Lower School on the Drummond Street site (redevelop for other uses such as housing)

This option would provide a sustainability benefit by providing new housing, Camden's priority and use. However, the failure to allow for the re-provision would be likely to generate significant negative sustainability outcomes, in the context of the potential impacts of HS2 related noise and disruption on the existing Maria Fidelis schools site, the consequent need to consider relocation of the school and the suitability of the site to enable the delivery of a consolidated schools site for Maria Fidelis. Without the re-provision of the school site, there could be significant impacts on the local community, which includes significant pockets of deprivation, in terms of the ongoing viability of an existing community facility.

However, if Euston Station were to be redeveloped on its own footprint, this option would not raise the same sustainability issues as the need to re-provide Maria Fidelis Lower School would reduce. In this instance, the negative impacts of this alternative would be reduced and it may generate positive outcomes by delivering new mixed uses in a sustainable location (subject to satisfactory relocation of the existing uses).

Appendix E

HABITATS DIRECTIVE ASSESSMENT

Euston Area Plan

December 2013

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Screening Assessment: Potential impact of the Euston OAPF on sites protected in the Conservation (Natural Habitats) Regulations 1994

1. Background

This report sets out the findings of the screening assessment that was carried out to determine whether Tasks 2 and 3 of a Habitats Regulations Assessment are required for the Euston Area Plan (EAP). A separate Sustainability Appraisal is also being prepared for this document (to which this screening assessment is an Appendix), which is reported separately.

This Habitats Regulations Assessment screening report will be submitted to the Secretary of State with the EAP document and other submission documents for consideration at the Independent Examination. The examination Inspector will consider the soundness of the EAP, using this Habitats Regulations Assessment as part of the evidence base.

The Conservation (Natural Habitats) Regulations 1994 implement the European Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora – known as the 'Habitats Directive'. The Habitats Directive and Regulations provide legal protection for the habitats and species of European importance. The Habitats Directive also established a European network of nature conservation sites which is known as the Natura 2000 network. These sites consist of Special Areas of Conservation (SACs) - which protect habitats, Special Protection Areas (SPAs) - which protect birds and Offshore Marine Site (OMS), as well as RASMAR sites which protect wetlands. An Appropriate Assessment (AA) is a formal assessment of whether a plan or project is likely to have a significant or an adverse impact on the integrity of a Natura 2000 site.

The Department of Communities and Local Government has published draft guidance on *Planning for the Protection of European Sites: Appropriate Assessment*. The draft guidelines set out three key stages of assessment under the Habitats Regulations:

1. Screening Assessment - likely significant effects (AA task 1)
2. Appropriate Assessment & ascertaining the effect on site integrity (AA task 2)
3. Mitigation and alternative solutions (AA task 3)

The Screening Assessment for the EAP determines if the document is likely to have any significant effects on the conservation objectives of a Natura 2000 site (this will also consider the cumulative effects of the proposals) or an adverse impact on the integrity of the site. The assessment demonstrates whether tasks 2 and 3 of the Habitats Regulations Assessment will be necessary. The Natura 2000 site may be located within the London Borough of Camden or beyond its boundary as plans and projects may have a significant effect on Natura 2000 sites located some distance away.

If the screening assessment anticipates significant adverse impacts, a full Appropriate Assessment will be required to consider the potential impacts in more detail and whether alternatives can be adopted. If there are no viable alternatives, the Plan can only be implemented if there are 'imperative reasons of overriding public interest'.

The methodology for this assessment has been taken from the Department of Communities and Local Government draft guidance *Planning for the Protection of European Sites: Appropriate Assessment* and that used in *Screening Report: draft Further Alterations to the London Plan* by Forum for the Future, including *The Habitats Regulations Assessment of Regional Spatial*

Strategies and Sub-Regional Strategies (David Tyldesley and Associates, for Natural England, March 2007). It also reflects the approach to Screening Assessments taken for the Camden Core Strategy, Development Policies and Site Allocations, and also by a number of other London boroughs. In line with common practice, this Screening Assessment extends the assessment area to approximately 10km beyond the boundaries of the London borough of Camden.

2. Assessing likely significant effects

2.1 Identification of relevant sites

The European sites within approximately 10km of the London Borough of Camden have been identified on the Joint Nature Conservation Committee (JNCC) website and are listed in Table 1 below. Richmond Park is just beyond the 10km radius, but for completeness is included in this Screening Assessment.

Table 1. European sites in the London area

Site Name	Designation & Code
Epping Forest	Special Areas of Conservation SAC (UK0012720)
Lee Valley	Special Protection Areas SPA (UK9012111) RAMSAR (UK 11034)
Richmond Park	Special Areas of Conservation SAC (UK0030246)
Wimbledon Common	Special Areas of Conservation SAC (UK0030301)

The description of these sites and the rationale for their conservation at European level has been taken from the *Screening Report: draft Further Alterations to the London Plan* which also includes supplementary information to assess the vulnerability of sites to potential adverse impacts. This is presented in table 2 on the following pages. The tables were compiled from the Natura 2000 forms and Natural England’s ‘conservation objectives’ for Sites of Special Scientific Importance (SSSIs) with European interest.

Table 2 Natura 2000 site descriptions

Definitions

Qualifying Features: habitats and species relevant to the awarding of EU conservation status. The AA identifies how these features are safeguarded.

Current Condition and Threats: provides information concerning the current status of sites, recognised trends, and potential threats.

- *Favourable condition* - the SSSI is being adequately conserved and is meeting its 'conservation objectives', however, there is scope for enhancement
- *Unfavourable recovering condition* - often known as 'recovering'. SSSIs are not yet fully conserved but all the necessary management measures are in place. Provided that the recovery work is sustained, the SSSI will reach favourable condition in time. In many cases, restoration takes time.
- *Unfavourable no change* - the special interest of the SSSI is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery.
- *Unfavourable declining* - the special interest of the SSSI is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The site condition is becoming progressively worse.

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
		Habitat	Species			
Epping Forest	SAC UK0012720	To maintain in favourable condition: Acidophilous beech forests with <i>Ilex</i> and sometimes <i>Taxus</i> in the shrub	To maintain in favourable condition, the habitats for the population of: stag beetle, for which this is one	The reintroduction of pollarding and wood pasture management is helping to reverse the decline of the epiphytic bryophyte population. Existing air pollution is	Area favourable - 30% Area unfavourable recovering - 34% Area unfavourable no change - 26% Area unfavourable declining - 10%	Extent Natural processes and structural development Regeneration potential Composition Species Population size of species Number of old broadleaved

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Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
		Habitat	Species			
		<p>layer for which this is considered to be one of the best areas in the UK.</p> <p>European dry heaths and North Atlantic wet heaths with <i>Erica tetralix</i> of which both areas are considered to support a significant presence.</p>	<p>of only 4 known outstanding localities in the UK.</p>	<p>thought to contribute to poor condition of parts of the site.</p> <p>Increasing recreational pressure could have an impact on heathland areas.</p>		<p>trees</p> <p>Population structure of old broadleaved trees</p> <p>Condition of old broadleaved trees</p> <p>Quantity and size of fallen broadleaved dead wood</p> <p>Position and degree of exposure of old broadleaved trees and stumps. Condition and position of available dead timber.</p>
Lee Valley	<p>SPA UK9012111</p> <p>RAMSAR UK 11034</p>	<p>To maintain in favourable condition the habitats for the populations of an Annex I species* and populations of migratory bird species**, of European importance with particular reference to:</p>	<p>bittern * gadwall ** shoveler</p> <p>Under RAMSAR criteria 2, the site also supports a nationally scarce plant species and a rare invertebrate.</p>	<p>Most of the site is in favourable condition. There are currently no factors having a significant adverse effect on the site's ecological character. However, a significant increase in recreational pressure could impact upon wintering wildfowl numbers.</p>	<p>There are a number of SSSI's contained within the Lee Valley RAMSAR site of which Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable. Walthamstow Marshes are 36%</p>	<p>Disturbance</p> <p>Extent and distribution of habitat</p> <p>Landscape</p> <p>Landform</p> <p>Vegetation characteristics</p> <p>Water area</p> <p>Water depth</p> <p>Food availability</p>

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Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
		Habitat	Species			
		Open water and surrounding marginal habitats.			favourable and 63% unfavourable but recovering.	
Richmond Park	SAC UK0030246		To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known outstanding localities in the UK.	The site is surrounded by urban area and therefore experiences high levels of recreational pressure. This does not directly affect the European interest feature. The whole site has been declared an NNR.	Area favourable - 6% Area unfavourable recovering - 8% Area unfavourable no change - 86%	Population size of species Number of old broadleaved trees Population structure of broadleaved trees Condition of old broadleaved trees – state of decay Quantity and size of fallen broadleaved dead wood Position and degree of exposure of old broadleaved trees and stumps. Condition and position of available dead timber.

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
		Habitat	Species			
Wimbledon Common	SAC UK0030301	<p>To maintain in favourable condition:</p> <p>The European dry heath, for which the area is considered to support a significant presence.</p> <p>Northern Atlantic wet heath with <i>Erica tetralix</i>, for which the area is considered to support a significant presence.</p>	<p>To maintain in favourable condition the habitats for the population of:</p> <p>Stag beetle, for which this is one of only 4 known outstanding localities in the UK.</p>	<p>The site is located in an urban area and therefore experiences intensive recreational pressure which can result in damage to the sensitive heathland areas.</p> <p>Air pollution is also thought to be having an impact on the quality of the heathland habitat.</p>	<p>Area favourable - 40%</p> <p>Area unfavourable but recovering - 59%</p>	<p>Population size of species</p> <p>Number of old broadleaved trees</p> <p>Population structure of broadleaved trees</p> <p>Condition of old broadleaved trees – state of decay</p> <p>Quantity and size of fallen broadleaved dead wood</p> <p>Position and degree of exposure of old broadleaved dead trees and stumps</p> <p>Condition and position of available dead timber</p>

Source: Screening report: 'Draft Further Alterations to the London Plan' (Forum for the Future, September 2006)

2.2 Screening assessment of the Euston OAPF

Coding the potential impacts

Table 3 below provides a slightly adapted version of the coding criteria produced by Tyldesley and Associates guidance on Appropriate Assessments. These criteria are used to assess whether the policies and sites in the EAP are likely to impact on European sites.

Table 3. Coding used for recording effects/impacts on European Sites

Reason why policy will have no effect on a European Site	
1	The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
2	The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations)
3	No development could occur through this policy alone, because it is implemented through other DPD policies that are more strategic or more detailed and therefore more appropriate to assess for their effects on a European Site and associated sensitive areas.
4	Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
5	The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6	The policy is intended to protect the natural environment, including biodiversity.
7	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
Reason why policy could have a potential effect	
8	The policy steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
Reason why policy would be likely to have a significant effect	
9	The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

Source: *Screening report: 'Draft Further Alterations to the London Plan'* (Forum for the Future, September 2006)

2.3 Policy Analysis

Table 4 below provides an assessment, taking a precautionary approach, of each of the sites contained in the Euston OAPF. It also identifies where an appropriate assessment of the Camden Site Allocations document has already established why a site will have no impact

Table 4. Assessment of policies contained within the Euston OAPF

Policy No	Policy	Why policy will have no impact on sites	Why the policy is likely to have an impact on sites	Essential recommendations to avoid potential effects on European Sites
3.1	Overall strategy	2, 4		
3.2	Urban design strategy	1, 4		
3.3	Land use strategy: <ul style="list-style-type: none"> • Homes • Economy and employment • Retail and leisure • Social infrastructure • Open space 	2, 4		
3.4	Transport strategy	2, 4		
3.5	Environment and open space strategy	2, 4, 6		
4.1	Euston Station and tracks	4		
4.2	Euston Road	4		
4.3	Park View	4		
4.4	Drummond Street	4		
4.5	Regents Park Estate	4		
4.6	Amphill	4		
4.7	West Somers Town	4		
<i>The document incorporates land that includes the following sites identified in the Camden Site allocations LDF document:</i>				
	<i>Euston Station, Euston Road</i>	<i>3*, 4</i>		
	<i>Bhs Warehouse, 132-140 Hampstead Road</i>	<i>3*, 4</i>		
	<i>Granby Terrace</i>	<i>3*, 4</i>		
	<i>110-122 Hampstead Road (Former National Temperance Hospital)</i>	<i>3*, 4</i>		
	<i>1-39 Drummond Crescent (Euston Traffic Garage)</i>	<i>3*, 4</i>		

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	<i>Westminster Kingsway College, Regents Park Centre, Longford Street</i>	3*, 4		
	Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/Augustus St	3*, 4		

* Site already assessed under the appropriate Assessment Screening for the Camden Site Allocations development plan document, which concluded that the policy will have no impact on European sites due to reason 4.

3. Conclusion

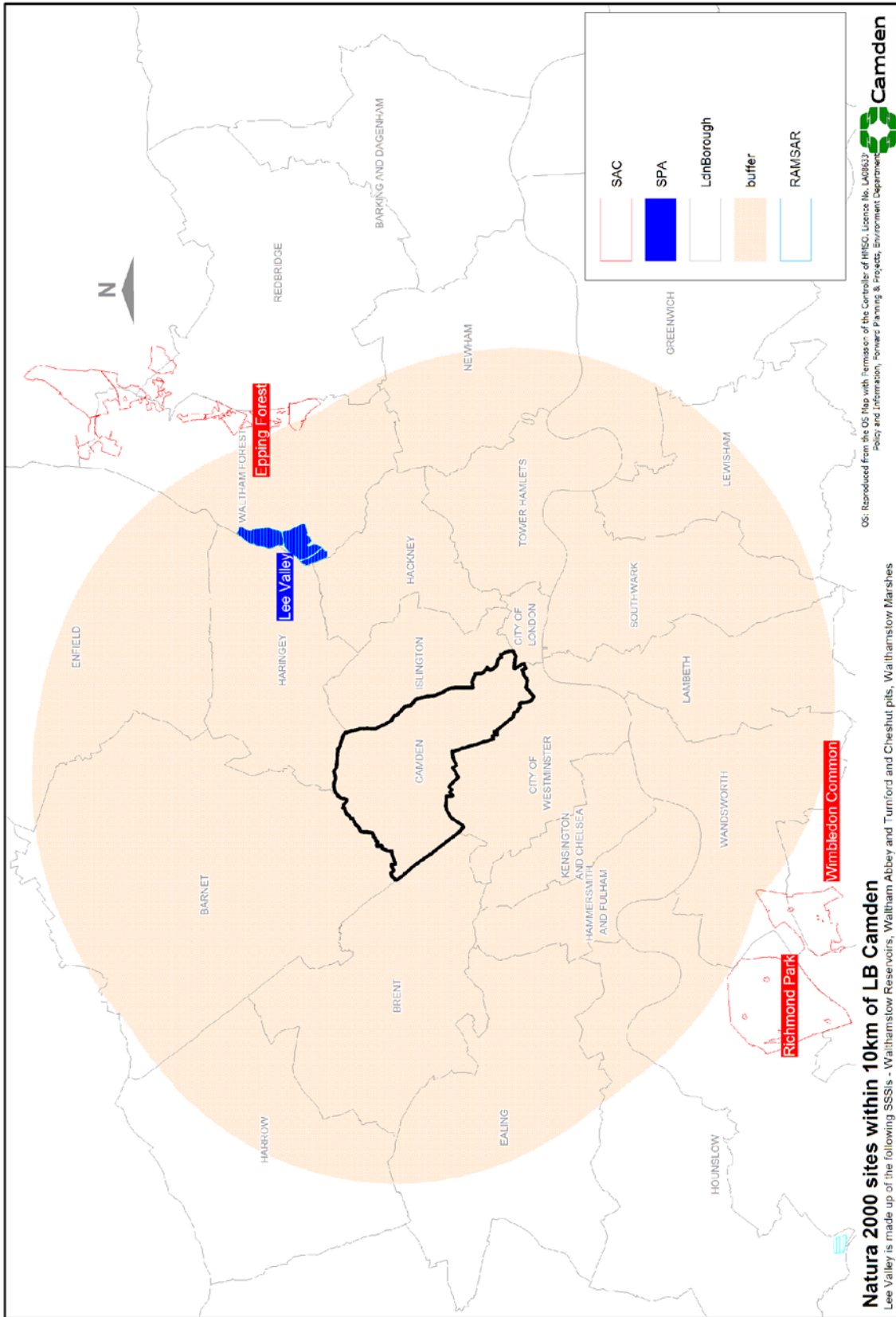
None of the proposed sites or policies were found to have likely significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites.

The strategic policies in Section 3 make provision for a quantum / type of development (reason 2); would not of their own accord lead to development (reason 3); r relate to the concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas (reason 4), or intend to protect the natural environment (reason 6).

All of the development areas identified in Section 4 of the Euston Area Plan are quite remote from the European site; are upon brownfield land; and proposals are usually for intensification purposes (reason 4).

The collective impact of development in Camden has been assessed as part of the Core Strategy and Development Policies Habitats Screening Assessment. This assessment found that the potential direct or potential indirect impacts identified for Camden would not have significant impact upon sites of European importance for habitats and species.

It is considered that the policies and sites in the Euston Area Plan are unlikely to have significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites. Therefore it is not considered necessary to carry out Task 2 (Appropriate Assessment) and Task 3 (mitigation and alternative solutions) of the Habitats Regulations Assessment.



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