

# **CONSULTATION STATEMENT**

## **Submission**

### **Euston Area Plan**

**April 2014**

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# 1 PROCESS OF CONSULTATION AND ENGAGEMENT

## Background

- 1.1 The Euston Area Plan (EAP) is being prepared to shape change in the Euston area in the period up to 2031. It is being prepared jointly by the London Borough of Camden (LBC), the Greater London Authority (GLA) and Transport for London (TfL). The plan area is centred around Euston Station and covers Regent's Park to the west and part of Somers Town to the east. To the north, the plan boundary includes Mornington Crescent, as well as the railway tracks running up to Parkway. To the south, the plan boundary includes Euston Road and the northernmost part of Bloomsbury.
- 1.2 The Euston Area Plan is being produced to respond to the proposed new High Speed Two (HS2) rail link, as well as reflecting and updating previous plans and aspirations for development in and around the station. Camden Council strongly opposes the HS2 project as it is concerned about the potential negative impacts on the areas affected by its construction, particularly around Euston and Camden Town. However if HS2 goes ahead, despite Camden Council's objections, it is important that the Council plans ahead to get the best possible results for local people and businesses and to make the most of any potential benefits a new station and rail link could present. If HS2 does not go ahead, the Plan will be useful in refreshing previous plans and encouraging growth in the Euston area.
- 1.3 This report provides a summary of the consultation activities undertaken to date. These activities have helped inform the production of the Euston Area Plan and ensure that the priorities and concerns of local people were taken into account in developing a strategy for the area.
- 1.4 These consultation exercises, plus other informal consultation, meet the requirements of Regulations 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 and the Council's Statement of Community Involvement (adopted 2011). In order to satisfy the requirements of regulation 22(1) clauses (c)(i) to (c)(vi), this statement incorporates and expands the Proposed Submission Consultation Statement published in January 2014.
- 1.5 As required under the regulations, this statement set out:
  - which bodies and persons were invited to make representations under regulation 18;
  - how those bodies and persons were invited to make representations under regulation 18
  - a summary of the main issues raised by the representations made pursuant to regulation 18;
  - how any representations made pursuant to regulation 18 have been taken into account; and
  - the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations.

### Ongoing stakeholder engagement

- 1.6 The production of the Euston Area Plan has been guided by project Boards, which have members from the GLA, Camden Council and TfL and are also

attended by officers from HS2 and Network Rail as key stakeholders for the station and tracks. An overarching Strategic Board provided strategic guidance for the plan, which is chaired by the Leader of Camden Council, Cllr Sarah Hayward. The structure and attendees of the boards is set out in the illustration below (figure 1). The EAP has been shaped and guided where appropriate by technical information and inputs from HS2 and Network Rail, and the board process has been essential to the creation of the plan.

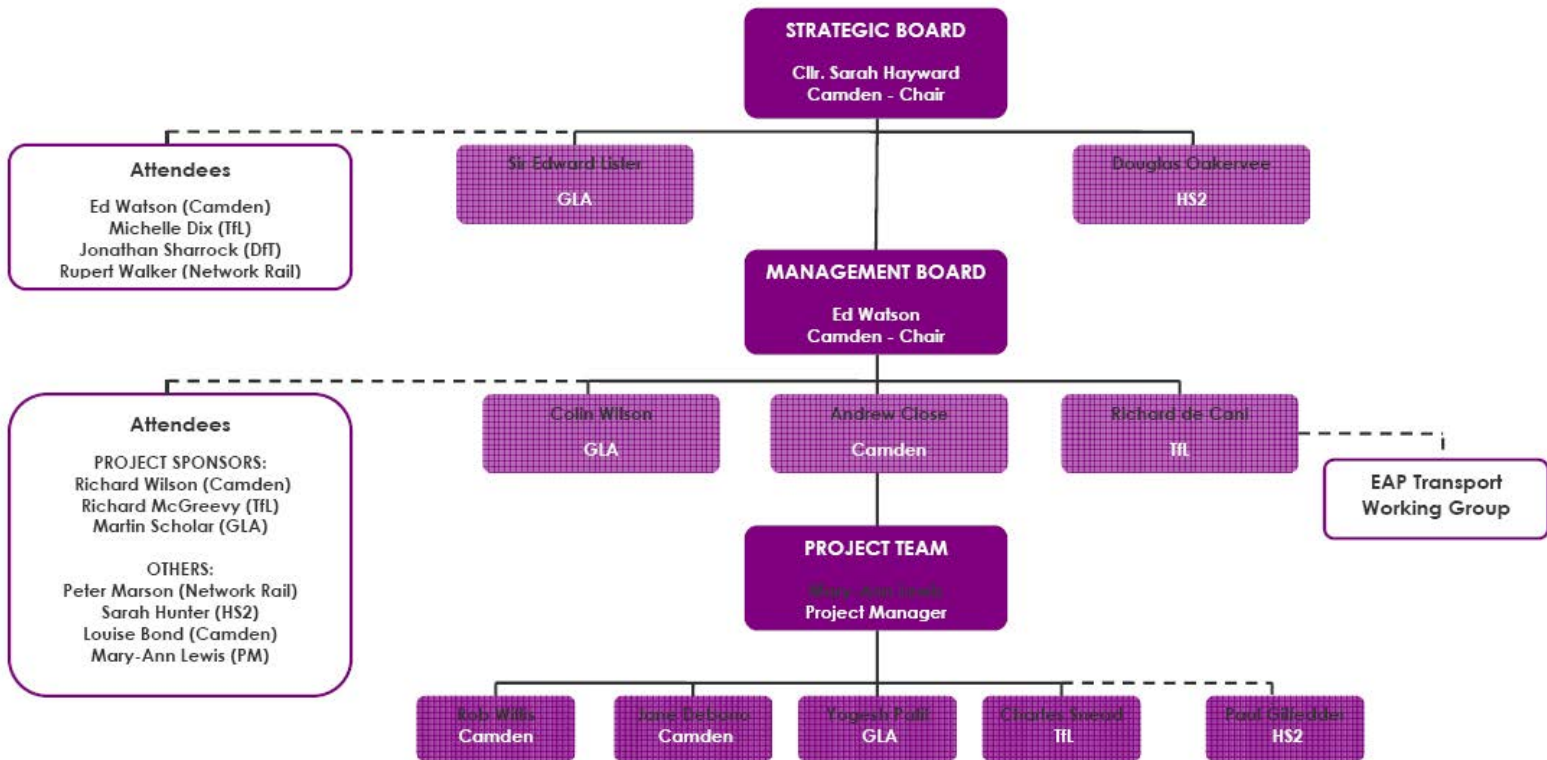


Figure 1: EAP governance structure

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

### Bodies and persons invited to make representations

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

## **Duty to Cooperate**

- 1.9 To ensure the Council meets its Duty to Cooperate duties the EAP team:
- Liaised with neighbouring and relevant authorities on the HS2 route on the progress of the plan and to invite discussion/comments to meet with the Duty to Cooperate requirements. All constituent members of the Association of London Borough Planning Officers were emailed to invite London boroughs to be involved in the preparation of the EAP (the only response being from Westminster)
  - Liaised with the City of Westminster on an ongoing basis including meetings to discuss progress
  - Wrote to all neighbouring boroughs at Stage 1, Stage 2 and Stage 3 of the consultation process to inform them of the consultation process. Notably, despite writing to the adjacent City of London and Islington boroughs at each stage to seek their views no responses were received.
  - Wrote to Birmingham, Sheffield, Manchester and Leeds to inform them of the consultation periods for the evolving EAP, setting out key strategic elements of the plan and to seek their views. We received a response from Sheffield City Council, who stated that they broadly support the principles and objectives proposed to guide future development, as they would reflect those in the Sheffield Local Plan

## **Consultation activities**

### **Initial engagement of community organisations and representatives**

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

- Euston Road/Hampstead Road crossing difficulties
- Problems with the existing station
  - Drop station below ground and develop on top of it
  - Design should be informed by the surrounding townscape context.

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

### **Stage 1: consultation on priorities and objectives**

1.14 The Stage 1 consultation ran from 5<sup>th</sup> November to 14<sup>th</sup> December and focused on the draft key objectives and vision for the EAP. The purpose of the consultation was to:

- inform local residents and businesses about the Euston Area Plan
- seek their views on the emerging vision and objectives for the area
- ascertain whether there are any other key issues that should be addressed in the Euston Area Plan.
- Seek initial views on land uses and connections in the area

1.15 In order to meet the aims of the consultation strategy, the process used a mixed methods approach to maximise the opportunities for individuals and organisations to comment, including those who traditionally give their views and also to specifically target hard to reach groups. This included the following:

- Developing a broad consultee base:
  - Identifying users and stakeholders including interest groups and organisations and setting up a database
  - Identifying community networks and meetings
  - Carrying out a gap analysis highlighting hard to reach groups
- Creation of a bespoke Euston Area Plan website and consultation hub including twitter feed and email sign up functions for use on ipads
- A mail out to all residents and businesses in the plan area advertising the website, survey and consultation events to ensure those without internet access were made aware of the consultation underway. Approximately 5,800 letters were sent out.
- A public advertisement about the consultation was placed in the Camden New Journal
- Hard copies of the consultation materials were made available at Regent's Park, St Pancras and Camden Town libraries
- A dedicated survey questionnaire was made available, both on-line and as a paper copy. The survey:
  - Asked people what uses and routes they would like to see on the new station site, asking respondents to map out their ideas for land use and connections (including on interactive maps on the online version); and
  - Asked people to comment on and prioritise the draft objectives for the plan and for any other comments on what the plan should address.

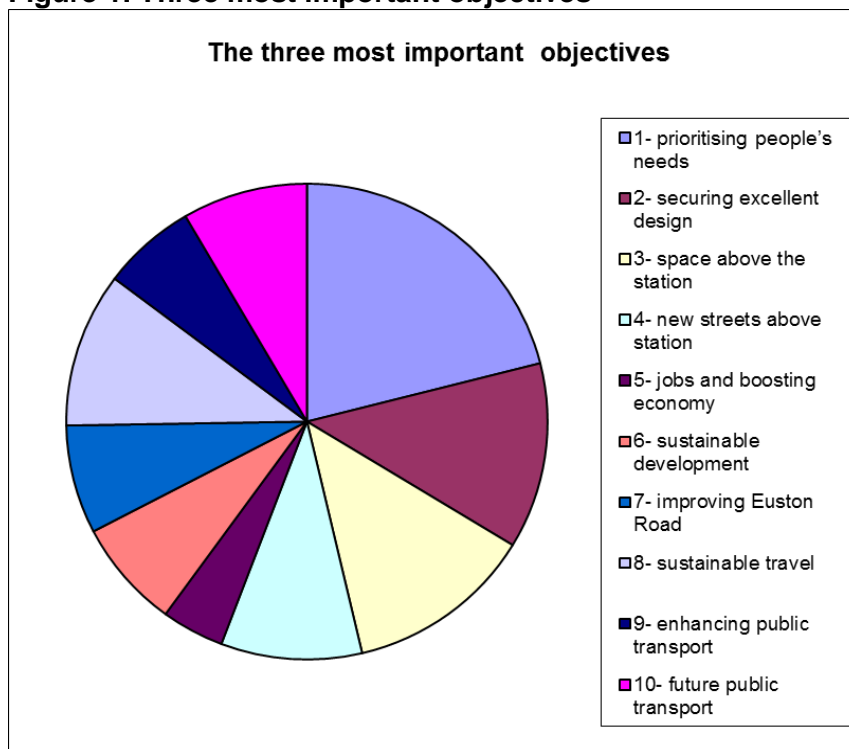
- A range of consultation events (17 events were held or attended in total):
  - A pop-up exhibition detailing the objectives and constraints in the Euston Area
  - Drop-in sessions at Regent’s Park library and other community organisations, specifically to target people from the Bengali communities and young people
  - Use of drop in sessions on estates to engage with residents in these areas
  - The meetings with specialist groups
- Contacting statutory consulters by letter
- Use of targeted posters and publicity such as ‘We are Camden’
- Maintaining regular contact with interested residents and business focus groups through email bulletins

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

**Key outcomes**

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

**Figure 1. Three most important objectives**



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

1.18 Whilst the consultation indicated that the draft objectives reflected the priorities and concerns of local people, a number of detailed comments were made that helped to inform the production of the draft Plan, by highlighting other issues that were important to local people. Comments on appropriate land uses for the area highlighted the importance of east-west links across the station site and the priority for a focus for commercial development on the southern end of the station site, and residential, open space and community uses further north and on the cutting.

1.19 Section 2 of this Consultation Statement sets out the key other issues that were raised during the stage 1 consultation, alongside the EAP response to the comments received.

### **Stage 2: consultation on the draft Euston Area Plan**

1.20 The Stage 2 consultation ran from 29th July to 7th October 2013, and sought the views of the local community, stakeholders and others on the draft Euston Area Plan.

1.21 The consultation included a range of consultations methods including a questionnaire survey, events and bespoke meetings:

- 5,800 letters and enclosed questionnaire surveys were mailed out to Euston Area Plan contacts lists, statutory stakeholders and all properties within the Euston Area Plan boundary
- A public advertisement was placed in the Camden New Journal
- The draft Euston Area Plan, Sustainability Appraisal and supporting materials were made available on the Euston Area Plan website
- A dedicated survey questionnaire was made available, both on-line and as a paper copy Hard copies of the draft EAP and supporting materials were made available at St Pancras and Camden Town libraries
- 600 additional questionnaires were handed out at drop-in events
- 7 public drop-in events were held on open spaces across the Euston area
- 6 bespoke stakeholder meetings were held along with a community workshop in September

1.22 People engaged with, and submitted their views on the consultation by attending the consultation events, filling in the online survey and responding by email and letter:



- 80 surveys were completed with 55 respondents providing additional comments
- 45 additional email/ letter responses received
- Out of the total of 125 responses received, 38 were representing stakeholders (community groups, businesses, organisations)
- More than 500 individual points of comment were received during the consultation period
- 200 people attended our drop-in events

### Key outcomes

1.23 A summary of outcomes from this consultation period is provided in Section 2 of this report. The key findings from both the survey results and comments received are summarised below as follows:

- There was general support for the approach taken by the plan to the station area (i.e. support for improvements to Euston Station) but there were caveats on the need to secure a comprehensive redevelopment of the station which the current HS2 plans on their own do not propose.
- Survey responses illustrated that the plan was on balance considered to have largely met its objectives.
- Consultation was robust and provided consistent responses across the consultation tools.
- All proposal areas, except North Euston Cutting were on balance considered to broadly meet the EAP objectives in the survey with the plan proposals for West Somers Town and Euston Station and tracks considered most frequently by respondents as meeting plan objectives.
- 25 respondents to the survey expressed outright opposition to HS2 coming into Euston which was reflected in the overall results. People wanted more detail on the proposals in relation to the impact of HS2 should it go ahead.
- The general tenor of responses was that people wanted to see change to the Euston area but were keen for more information about what this may mean.

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

- Outright opposition to HS2
- The EAP should show station design alternatives to those currently proposed by HS2 (extending to the side not redeveloping existing station) such as the original HS2 baseline scheme and the double deck down community scheme
- Opposition/ concerns regarding North Euston Cutting proposals although others expressed support for developing over the cutting/ extending cutting to provide open space/ housing
- Concerns regarding the impact of buses/ taxis on the local area
- Support for enhancing Euston Road
- Concern regarding loss of open space
- Concern regarding level of density proposed
- Need for more truly affordable housing
- Support for more housing
- Support for removing the blank façade of the station along Eversholt Street and the provision of active frontages here

- 1.25 Key local stakeholders, including landowners and community groups also provided comments on the draft plan and the key comments are below:
- Support from nearby research and higher education institutions for knowledge economy focus (UCL, Wellcome Trust, University of London and the Francis Crick Institute)
  - Network Rail sought greater development capacity and more flexibility in approach to employment and retail uses
  - HS2: various comments seeking clarifications to text on the potential impacts of HS2 and highlighting the need for appropriate evidence for mitigation references.
  - English Heritage: various minor comments to ensure that heritage considerations including the setting of heritage assets is considered/ incorporated
  - Euston Community Forum: various concerns around impacts on the local area and the need to consider alternative station design options
  - Somers Town Neighbourhood Forum: concerns regarding EAP boundary and impacts on Somers Town.
- 1.26 The comments received helped to inform changes to the draft Euston Area Plan, in order to take the Plan forward to the proposed submission stage (see Section 2 below).

### **Stage 3: Publication of the proposed submission Euston Area Plan**

- 1.27 Consultation on the proposed submission Euston Area Plan took place from 8<sup>th</sup> January to 5<sup>th</sup> March 2014. The proposed submission documents included the proposed submission Euston Area Plan, Sustainability Appraisal Report, proposed changes to the LDF proposals map, consultation statement, and a range of supporting documents. The proposed submission EAP took into account comments received during the earlier stages of consultation (see Section 2).
- 1.21 As required under the 2012 regulations, the proposed submission documents were made available for inspection and comment, and a range of individuals and organisations were notified of the proposed submission consultation and representations procedure:
- Approximately 5,800 letters were mailed out to Euston Area Plan contacts lists (including the general consultation bodies), statutory stakeholders and all properties within the Euston Area Plan boundary. The letters set out the representations procedure and the availability of the proposed submission documents for inspection;
  - A public advertisement was placed in the Camden New Journal;
  - The Proposed Submission Euston Area Plan, Sustainability Appraisal Report, representation form, supporting material and a statement setting out the representations procedure were made available on the EAP website, along with an online questionnaire survey;
  - Hard copies of the proposed submission materials were made available at St Pancras and Camden Town libraries.

### Key outcomes

- 1.22 In total, 79 representations were received from 24 representors. A summary of the main issues contained within these representations and the Council's draft responses to them is contained within section 3 of this statement.
- 1.23 There was general support for the approach taken in the Euston Area Plan by a range of statutory and other key bodies, including English Heritage, HS2 Ltd (subject to a range of detailed comments), University College London, the Environment Agency, Thames Water and Westminster City Council. However, concerns were also raised by a range of local groups and individuals, for example in relation to the extent and density of development proposed and its impacts on local communities, the effects of HS2 on the area and the need to incorporate proposals for a 'Double Deck down' station design. Conversely, Euston Estates (long leaseholders of the three buildings in front of the station) were concerned that the amount of development above the station in particular was not ambitious enough or likely to be viable. See section 3.

## **2. SUMMARY OF ISSUES RAISED PRIOR TO THE PREPARATION OF THE PROPOSED SUBMISSION PLAN (2012-2013) AND EAP RESPONSES**

- 2.1 The following tables below set out a summary of the issues raised during the Stage 1 consultation on the objectives for the Euston Area Plan in autumn 2012, and during the Stage 2 consultation on the draft Euston Area Plan, in summer 2013. They also set out the main changes which were made to the Euston Area Plan (resulting in the proposed submission draft) in response to the various consultation processes. Although the stage 1 consultation only involved discussion of objectives and land use the table shows how issues raised relate to the current EAP chapters for ease of reference.

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

STAGE 1 CONSULTATION: EUSTON AREA PLAN OBJECTIVES AND PRIORITIES		
Relevant plan reference	Summary of comments	EAP response and suggested change
3.4 Transport strategy)	terms of east – west connectivity across the station	movement across the area. Improving permeability is reflected in all appropriate policy areas
(3.3 Design strategy)	Respect for the viewing corridors. The new part of Euston should be of human scale and designed for pedestrians and cyclists.	In relation to development, the EAP seeks to balance height and scale of development with creating an attractive, well-designed place that respects the viewing corridors. New green routes are suggested across the plan area with priority given to pedestrian and cycling routes where possible
(3.3 Design strategy)	Heritage was consistently raised as an important consideration. Heritage assets need to be better identified and the character of conservation areas around the area needs to be reflected in the plan proposals. Importance of getting the design right, respecting local character- specific reference to historic street pattern and other important heritage assets was provided in the draft plan	Explicit reference to the importance of reflecting the historic character was therefore added to the Plan Objectives. Historic character is also addressed in development principle EAP 4 in area policies where relevant.
(3.3 Design strategy)	Regents Place was commented on several times as not desirable to replicate	The EAP emphasises the need to build on existing character and uniqueness, and the creation of a vibrant place with a mix of uses that fully integrates with its surroundings.
(3.4 Transport strategy)	Linkages for pedestrians/cyclists into and out of the area	The EAP places a strong emphasis on enhancing connectivity and the local environment for pedestrians and cyclists.
(3.5 Environment and open space strategy)	Air pollution during and after completion of HS2 should it go ahead. Air pollution is an important concern for local people in relation to Euston Road generally but also the impact of buses and taxis-specific policy area related to Euston Road	The EAP seeks to enhance the environment along Euston Road and places an emphasis on addressing air pollution through the promotion of an Ultra Low Emissions Zone, promoting less polluting forms of transport, and promoting urban greening.

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

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



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

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
Part 3.0 – Development strategy - introduction	Concerns from a number of community groups, including the Euston Community Forum that the plan should show a number of options for station redevelopment, not just the current HS2 proposals. The Somers Town Neighbourhood Forum commented that the EAP may be premature if we do not know the eventual station design yet.	<p>The EAP will be designed to be flexible to respond to a range of station design scenarios, whilst seeking to influence station design for the benefit of the area.</p> <p>The introductory text to the development strategy has been amended to clearly set out three main options for station design:</p> <ol style="list-style-type: none"> <li>1: Sub surface comprehensive station redevelopment</li> <li>2: New high speed terminus alongside existing station</li> <li>3: Redevelopment on existing station footprint</li> </ol> <p>This sets the context for the principles set out in the section 4.1 on Euston Station and tracks. It also highlights how a sub surface comprehensive station would better deliver against EAP objectives.</p>
Part 3.2 Strategic Principle EAP 1 - Land use	Concerns from community groups on the need for more homes, affordability of housing and the mix of housing proposed.	Strategic Principle EAP 1 has been amended with additional text to further emphasise the priority for affordable housing and the need to seek types which are appropriate in the context of the high house prices and market rents in the area, reflecting the wording of the Fitzrovia Area Action Plan which has been agreed with the GLA through the AAP examination process. Text has also been added to state that a mix of unit sizes will be sought and need for family housing in the borough– this is in line with Camden and London Plan policies.
Strategic Principle EAP 1 - Land use	Concerns from local education and research institutions regarding access to affordable housing for staff and the need for student accommodation in the area.	Amendments made to clarify that a proportion of student housing may be appropriate as part of the overall additional housing range set out in Strategic Principle EAP 1, however at least 75% of the housing provided should be as permanent self contained housing (use class C3) as this is the Council's priority land use, and there is a need to retain balanced and mixed communities in line with Camden's Core Strategy policy

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
		CS6.
Strategic Principles EAP 1, 2, 4	Concerns from community groups on the density of housing development in the plan area	The density of housing and commercial development stated in the plan is considered appropriate in this highly accessible central London location (public transport accessibility level 6 on average) and is in line with the London Plan Sustainable Residential Quality densities (London Plan 2011, Policy 3.4 and table 3.2). The number of homes and jobs that are capable of being accommodated in the area will be dependent upon the station design progressed, and an appropriate range for these is set out in Strategic Principle EAP 1 and in the relevant Place Development Principles of the EAP. The highest levels of development are likely to be capable of delivery in association with a sub surface comprehensive station design.
Strategic Principles EAP 1, 2, 4	Concerns from community groups on the use of roof gardens and balconies as a means of meeting open space requirements.	In this central location, and with the constraints involved in station redevelopment and decking over tracks, the overall approach to open space provision is considered appropriate. However, concerns regarding open space are recognised, and given these concerns and the additional development potential identified for the area, the EAP now provides a stronger emphasis on securing additional open space on the northern half of North Euston Cutting, subject to viability/ funding availability (see Sections 4.1 and 4.3). Additional emphasis has also been placed on the provision of local open spaces on vacant/ underused land on Regent's Park Estate in order to meet open space needs generated by development. The plan also seeks to improve access to and quality of existing open space, in recognition of the important role of open space in meeting community needs.

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
Strategic Principle EAP 1 - Land use	Key stakeholders, including University College London, the Wellcome Trust, Francis Crick Institute and the University of London supported priority for knowledge based, science and creative industries as part of the overall employment floorspace capacity. Conversely land owners such as Network Rail supported the aspiration to support these uses but expressed concern on proposing 30% of the total employment floorspace.	The EAP Economic Vision report (GVA/Aecom, 2013) prepared to support the EAP indicates that around 50,000 sqm of knowledge based, science and creative sector uses (30% of the potential new floorspace indicated) should be pursued as an aspiration, in order to establish meaningful cluster of such uses. Planning applications will be assessed against the 30% proportion and wider viability and delivery issues as appropriate, therefore no changes are suggested. Supporting text in Section 3.2 has been amended to explain the reasoning behind the quantum of knowledge based uses sought, and to state that Camden and the Mayor will <i>promote</i> this level of provision.
Strategic Principles EAP 1 – Land use	Support was expressed for proposed measures to promote local employment opportunities as part of economic growth.	Support noted.
Strategic Principle EAP 1 - Land use	Landowners concerned about the 20,000sqm threshold for new retail provision being too low.	Policy EAP1 has been amended to promote ‘in the region of’ (rather than ‘up to’) 20,000 sq m retail at Euston, in order to provide more flexibility. Additional supporting text has also been added to explain the rationale for this figure, and state that this figure does not necessarily represent a fixed limit on potential retail. However, detailed assessments would be required to demonstrate there would not be detrimental impacts on neighbouring centres.
Strategic Principles EAP 1 – Land use	Provision of education facilities (use class D1) should be more clearly identified in the plan to help facilitate the wider knowledge zone aspirations.	Additional text added to clarify the potential circumstances for educational facilities provision in the Land Use Strategy, Strategic Principle EAP 1. Where they support the provision of the core research and development and work towards the aspiration of achieving a knowledge cluster here they may be appropriate.

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

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

STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
		expected to demonstrate why they cannot meet policy targets within this policy framework, and this will be considered as part of a planning application process. Where relevant, known constraints that could affect viability are acknowledged in the EAP.
Development Principle EAP 1 – Euston Station and tracks and EAP 7 – West Somers Town	Support from some respondents for introducing active frontages along Eversholt Street in place of the existing blank station wall, and for improvements to area in front of the station	Support noted.
Development Principle EAP 2 – Euston Road	English Heritage and others noted the need to improve the gardens and carefully reinstate them if required by HS2.	Additional text added to clarify expectations for the reinstatement of Euston Square Gardens should they be required by HS2 during construction.
Development Principle EAP 2 – Euston Road	A number of respondents highlighted the need to improve connectivity and the public realm along Euston Road	Development Principle EAP2 places a strong emphasis on enhancing the environment and improving connections across Euston Road.
Development Principle EAP 3 – North Euston Cutting	Community groups and survey results indicated that there were concerns about density and design of development in the cutting area, particularly in terms of its sensitive context – conservation area setting and generally lower density residential nature.	Camden’s prioritises the delivery of new homes, and the potential to deck over under-utilised centrally located space to provide new housing at North Euston Cutting will help to meet housing need/ demand and make the best use of brownfield land.  In order to address concerns on density, design and the historic context, additional text has been added to further strengthen the requirements in relation to design and landscaping and the need to carefully assess and demonstrate how the proposals could successfully relate and respond to the wider townscape, particularly the fine grained historic terraces overlooking the cutting.
Development Principle	Where space above the tracks is decked, a	The draft EAP text highlighted the potential for further open

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Plan reference	Summary of comments	EAP response and suggested change
EAP 3 – North Euston Cutting	number of respondees expressed a desire to maximise the amount of open space and/or housing provided here	space to be provided on the northern half of the cutting, but noted the need for additional funding. This has been strengthened in the proposed submission EAP, which shows the open space on illustrative masterplans with additional supporting text to add emphasis on its delivery (particularly under higher development scenarios). The supporting text also highlights potential constraints associated with developing over the cutting, as engineering requirements may not allow for the entire cutting to be decked over.
Development Principle EAP 4 – Drummond Street and Hampstead Road	Concerns were expressed by local residents, community groups and businesses about the need to retain flexibility on the size of shop units in Drummond Street. One respondent also highlighted the need to allow vacant units to be converted to residential use.	Ensuring businesses along Drummond Street remain viable is a key priority for the Euston Area Plan, therefore the text has been amended to remove limits on unit sizes and to reflect the need for some flexibility. The text has been amended to avoid change of use to residential at ground floor level, as the loss of active uses at street level would be likely to harm the vibrancy and vitality of the street.
Development Principle EAP 4 – Drummond Street and Hampstead Road	Business groups along Stephenson Way request public realm improvements to this street to complement those suggested in the wider area.	Stephenson Way added as a street where public realm improvements will be encouraged.
Development Principle EAP 5 – Regents Park Estate	LB Camden Housing consultation has identified potential sites for infill housing on the estate. A number of respondees to the consultation suggested that infill housing within the estate identified as part of this process should be identified in the Euston Area Plan.	Infill housing potential sites identified through LBC Housing's consultation with local residents are now identified in the illustrative masterplan. The associated number of replacement homes these sites will provide has been identified in the Regents Park Estate section with the caveat that the Council will continue to work with the local community to investigate the feasibility of these and any further opportunities for infill.
Development Principle EAP 5 – Regents Park	Community concerns about the potential development of open space for infill housing.	Parts of the infill replacement housing sites rely on the redevelopment of some housing green space within the



STAGE 2 CONSULTATION: DRAFT EUSTON AREA PLAN		
Plan reference	Summary of comments	EAP response and suggested change
Estate		Regents Park Estate. Additional text has been added to Development Principle EAP5 that refers to 'taking opportunities to provide new open spaces'. In the supporting text, emphasis has been placed on the provision of new local open spaces on vacant/ underused land on the estate in order address these impacts.
Development Principle EAP 5 – Regents Park Estate	Community concerns regarding the potential impacts of extra traffic on the quiet feel of the estate	Additional text has been added in relation to transport and public realm to emphasise that any new and improved links would focus on cycle and pedestrian movement, with traffic calming measures introduced where appropriate.
Development Principle EAP 6 – Ampthill & Mornington Crescent	Community concerns around new development and aspirations to enhance routes and legibility around Ampthill estate due to previous crime and safety problems on the estate which have been perceived as resolved through gating open space.	Additional text has been added under the aspiration to reinstate historic street patterns, to reference the need to ensure that the safety and security of residents is not compromised.
Development Principle EAP 6 and EAP 1	Community concerns around the inclusion of bus facilities on Eversholt Street.	The Eversholt Street bus facilities are included to facilitate the reorganisation of bus infrastructure at the front of the station, and to enable buses to terminate and turn around. The text in Section 4.6 emphasises the need to ensure that facilities are designed to minimise impacts on surrounding residential amenity and the pedestrian and cycle environment. Outside of the EAP process Camden Council are keen to investigate ways to improve the environment outside the station and the setting of the gardens by considering options for bus facility design. The option of placing bus stops on Euston Road instead of outside the station is considered in the Transport Study for the EAP. This indicates that using Euston Road for additional bus stops would cause significant cost and

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

### **3. SUMMARY OF MAIN ISSUES RAISED DURING PROPOSED SUBMISSION CONSULTATION (JANUARY - MARCH 2014) AND EAP RESPONSES**

- 3.1 The following table provides a summary of the main issues raised in representations on the Proposed Submission Euston Area Plan and the EAP response to those issues, including a number proposed changes to the EAP. Please note that the table below provides a summary of some of the main issues raised only. For the full list of comments made, and the EAP response, please see document EAP6 Schedule of representations and draft EAP responses.
- 3.2 It should be noted that since the preparation of the EAP Transport Study in 2013, more accurate transport modelling forecasts are now available. The EAP team are checking this information and whether it impacts on the Transport Study produced for the EAP in 2013. Updates will be provided if changes are required through the plan examination process.
- 3.3 It should also be noted that the draft EAP responses to representations are not necessarily the final response but act as a basis for discussion for those have submitted representations and provide an indication of the team's draft responses and suggested changes to the planning inspector. The team will continue to liaise with representors where appropriate to seek to resolve issues raised prior to examination hearings if possible.

STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
HS2 impacts and mitigation (various sections)	Changes requested by HS2 Ltd to descriptions of mitigation measures for Maria Fidelis, Silverdale Tenants Hall, Drummond Street public realm and Churchway playground, in order to be clear that mitigation measures are set out in the HS2 Environmental Statement and will be agreed through the HS2 Hybrid Bill.	Changes have been proposed to clarify that mitigation measures will be pursued through the Hybrid Bill, but also to highlight that Camden Council will continue to work to ensure the final mitigation provision secured through the Bill is appropriate.
1.4 (Material weight of this document)	HS2 Ltd sought changes to clarify the relationship between planning powers and the Hybrid Bill, and to highlight that HS2 mitigation measures will be determined through the Bill process.	Changes proposed to clarify HS2 scheme planning powers and highlight that mitigation will be determined through the Bill, but also to note that Camden, Mayor and communities can continue to seek to influence mitigation measures through Bill process
3.1 (Development Strategy)	A number of local residents and community groups emphasised the need to give greater support to proposals for a 'Double Deck Down' station design	The proposed submission version of the EAP sets out how the objectives and principles of the EAP could be taken forward through a range of alternative station redevelopment scenarios, including an approach that uses the existing station footprint. In response to these comments it is suggested that additional text is provided in Section 3.1 to specifically refer to the community led Double Deck Down station option under the 'existing station footprint' scenario, and to acknowledge the potential benefits of such a scenario in avoiding the need for demolitions and associated mitigation requirements. It is also suggested that a minor amendment is made to page xi (Executive summary) to acknowledge the benefits of existing station footprint scenario in avoiding demolitions.
3.3 (Design Strategy)	English Heritage highlighted the need for the	EAP to be amended as requested to highlight these points.

STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
	building heights indicated to be subject to further consideration of local impacts, and to highlight that any development proposals to be thoroughly tested against the London View Management Framework.	
3.2 (Land use strategy)	Requests by HS2 Ltd to ensure that reference to replacement housing and provision for leaseholders is consistent with the provisions of the HS2 Environmental Statement which accompanies the Hybrid Bill. HS2 also also requested that the meanwhile uses text is removed due to risk of blight.	<p>Changes have been proposed to clarify that:</p> <ul style="list-style-type: none"> <li>• The timing of housing demolitions will be determined by the HS2 Hybrid Bill but that LBC will work with HS2 to ensure that homes are replaced so that tenants only have to move once.</li> <li>• LB Camden will seek to make additional intermediate and private housing delivered in Euston area available for displaced leaseholders</li> <li>• The meanwhile uses policy text is proposed to be retained but slightly reworded to more fully describe the context and conditions where meanwhile or longer term change of use may be considered, to avoid blight potential and ensure the area around the station remains vibrant throughout HS2's construction.</li> </ul>
3.3 (Design Strategy)	A number of local groups expressed concerns regarding the density of development proposed in the Euston Area Plan and the impacts on quality of life in the area and potential contravention of human rights. Bloomsbury CAAC also commented that building heights fronting onto Euston Square Gardens are too high.	<p>The EAP seeks to balance the delivery of growth with sensitivity to historic context.</p> <p>The Euston Station site is a designated opportunity/ growth area in the London Plan and the Camden Core Strategy, and is expected to deliver significant numbers of new homes and jobs. It also has excellent public transport accessibility and is located in the Central London area. The EAP has been prepared in accordance with appropriate statutory framework for plan preparation and it is not considered that the EAP is in</p>

STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
		<p>contravention of the European Convention on Human Rights.</p> <p>Euston Road accommodates a number of larger format buildings and the approach taken to building heights across the EAP is informed by the Euston Historic Area Assessment (including the building heights shown on p41 of the Assessment). No change proposed.</p>
3.4 (Transport Strategy)	One respondent highlighted the need to address how the redevelopment of Euston Station could help reduce the need to travel	<p>The EAP seeks to reduce the need to travel through the provision of mixed use development. It promotes walking and cycling as alternatives to motorised and public transport, in order to take pressure off existing transport infrastructure. This includes seeking significant improvements to the public realm as well as substantial cycling infrastructure.</p> <p>No change suggested.</p>
3.5 (Environment and open space strategy) and 4.5 (Regent's Park Estate)	Community groups highlighted the impact of proposed growth on open spaces, and concern was expressed that replacement housing on Regent's Park Estate will lead to the loss of local green spaces.	<p>Strategic Principle EAP4 and supporting text set out an area-wide strategy for maximising the provision of open space, and a range of measures are set out in the Plan for open space provision, including a new replacement open space in the Drummond Street/ Hampstead Road area and seeking to maximise open space provision above the tracks to the north of the station.</p> <p>The timescales associated with the delivery of replacement housing in the local area prior to the demolition of homes, and the built up nature of the area, mean that currently clear sites would be needed. Development Principle EAP 5 and supporting text seek to ensure that an estate wide strategy for open space provision is taken forward alongside housing infill development.</p>

STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
		No change proposed.
3.5 (Environment and open space strategy)	The Environment Agency expressed support for the approach taken to managing surface water flooding, although two respondents highlighted concern regarding the impact of development on flood risk and how this should be ameliorated	<p>The EAP states on p62 that surface water management should be a design consideration in new development and highlights and promotes the role of green infrastructure in providing sustainable urban drainage. Detailed requirements from new developments are set out in policy DP23 of the adopted Camden Development Policies.</p> <p>Minor amendments have been suggested to the supporting text on p62 of the EAP to refer to Camden's Flood Risk Management Strategy, as suggested by the Environment Agency.</p>
4.1 (Euston Station and Tracks)	A number of local organisations and individuals expressed support for the rebuilding of the Euston Arch.	<p>Section 4.1 of the EAP provides guidance regarding the potential reconstruction of the Euston Arch, which is allowed for as part of indicative masterplanning (subject to viability considerations). See EAP figures 4.1 and 4.2, and page 74 (Euston Arch).</p> <p>No change suggested.</p>
4.1 (Euston Station and Tracks)	Concerns expressed by one resident regarding potential impacts of proposed bus stands (on the former Royal Mail premises) on the pedestrian crossings over Eversholt Street, and regarding the impact of enhanced connectivity and infill housing on community safety on Ampthill Estate.	<p>The EAP highlights the need to address the impact of any bus infrastructure on the pedestrian environment in the Ampthill/ Eversholt Street area (see p106). Wherever bus stands and other infrastructure are located, full consideration would need to be given to potential impacts on the public realm and community safety.</p> <p>The proposed submission version of the Plan was amended to acknowledge the need to address community safety and security issues associated with any enhanced links at Ampthill.</p> <p>No change proposed.</p>

STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
4.1 (Euston Station and Tracks)	Euston Estates (long leasehold owners of the three buildings in front of Euston Station) expressed concern that the plan is not ambitious enough in terms of the amount of development that could be accommodated above the station and throat area, and notes viability concerns for the levels of development mentioned in the EAP.	<p>The indicative number of homes, jobs and related floorspace stated in the Euston Area Plan for the station area is based on the estimated capacity for development above the station taking into account the various constraints here, including heritage, design, community concerns, open space provision and viewing corridor constraints.</p> <p>A high level viability assessment has also informed the level of development shown.</p> <p>The plan recognises that there may be potential for some taller buildings to the north east and south west of the station area, however if taller buildings are proposed here, or in other locations around the station, applicants would need to fully test their impacts against the London View Management Framework, and demonstrate how the proposals would fulfil wider design and EAP policy criteria. Capacity associated with this has therefore not been taken into account as there is no evidence that impacts would be acceptable at this stage.</p> <p>No changes proposed.</p>
4.2 (Euston Road)	Bloomsbury Conservation Area Advisory Committee highlighted the need for reference to be made to the original plan and layout of Euston Square Gardens in considering any future changes to the area.	An amendment is proposed for page 84 of the EAP to seek reference to the original plan and layout of the Gardens in the planning of any enhancements to the space.
4.3 (North Euston Cutting)	Concerns expressed by the Camden Cutting Group regarding the impact of proposed housing on the North Euston Cutting on existing residents	It is proposed to provide housing-led development and significant open space on the North Euston Cutting in order to make better use of currently under-used land, whilst providing



STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
	(construction impacts and open space issues)	for much-needed housing and open space. The EAP seeks to maximise the provision of open space above the railway cutting and has been amended (since the July 2013 draft EAP) to place a stronger emphasis on providing a larger open space to the northern end of the cutting (see Section 4.3), as well as proposing to integrate open space within housing development to the southern end of the cutting.
4.4 (Drummond Street and Hampstead Road)	Drummond Street traders would like Drummond Street kept open for through traffic	Given the proposed expansion and reconfiguration of the station it is considered likely that the retention of through traffic on Drummond Street could lead to problems with taxis and service vehicles when HS2 opens. However the exact traffic management regime would need to be discussed with traders and devised when more detailed information is available, it is therefore suggested that the current wording is revised, to reflect the need to design a pedestrian and cycle friendly environment and quality public realm with appropriate traffic management measures.
4.7 (West Somers Town)	Concerns expressed by a local resident regarding notification and compensation arrangements for potential demolition of Churchway	The Churchway Estate is not within the HS2 safeguarding area and it is not envisaged that its demolition would be required as a result of HS2, although there may be disruption in the area associated with the construction of HS2. Camden's Somers Town Community Investment programme is a regeneration strategy that is being developed to use the land assets to address the priorities of local people. As part of this work, Camden is assessing whether there may be the potential to deliver additional homes on the site through redevelopment, in consultation with local residents. However, no decisions regarding the future of Churchway have been made.

STAGE 3 CONSULTATION: PROPOSED SUBMISSION EUSTON AREA PLAN		
Relevant plan reference	Summary of main comments	EAP response and suggested change
		The EAP seeks to acknowledge this wider investigative work, while emphasising that future investigation of any opportunities will take pace with local residents. No change suggested.
Background Report Appendix 3	English Heritage suggested some changes to enhance the assessment of potential impacts of development on local views.	Changes to be made to Background Report Appendix 3 as requested, where appropriate for a strategic document.

## APPENDIX 1. BODIES AND GROUPS INVITED TO MAKE REPRESENTATIONS

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

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

Curnock Street Tenants and Residents Association  
 Darwin Court Residents Association  
 Diorama Arts  
 Disability in Camden (DISC)  
 DJ Deloitte  
*Dron and Wright Property Consultants*  
 Drummond Street Tenants and Residents Association  
 DTZ  
 Edith Neville Primary School Governors  
 Elm Village Residents and Tenants Association  
 English Heritage  
 Environment Agency  
 Environment Agency  
 Euston Estate (GP) Limited  
 Euston Arch Trust  
 Eversholt Centre  
 Fitzrovia Youth in Action  
 Flaxman Court Tenants and Residents Association  
 Francis Crick Institute  
 Friends House Euston Road  
 Friends of the British Library  
 Gloucester Avenue Association  
 GMW Architects  
 Godwin and Crowndale Tenants Management Co-operative  
 Goldington Street Estate Tenants and Residents Association  
 Greater London Authority  
 Greater London Authority (Housing and Land Directorate)  
 Green Light Wellbeing Centre  
 GVA  
 Hadley Street Residents Association  
 Highways Agency  
 Holy Cross Church  
 Hopscotch Asian Womens Centre  
 India Spice Shop  
 Jeebon Bengali Healthy Living Consortium  
 Kings Cross Conservation Area Advisory Committee  
 Kings Cross Safer Neighbourhood Panel  
 LB Ealing (Planning)  
 LB Islington  
 Leeds City Council  
 Leighton Road Neighbourhood Association  
 Local Intervention Fire Education  
 London and Continental Railways  
 London Borough of Barnet  
 London Borough of Brent  
 London Borough of Haringey  
 London Borough of Islington  
 London Fire Brigade  
 London First  
 Manchester City Council  
 Margaret Centre  
 Maria Fidelis School  
 Mayford Tenants and Residents Association  
 Mayor's Office for Policing and Crime/Metropolitan Police Service  
 Methodist International Centre  
 Metropolitan Police Camden  
 Mobile Operators Association  
 Monica Shaw Court  
 Moorfields Eye Hospital NHS Foundation Trust  
 Mornington Area Action Group  
 Mornington Crescent Group  
 Mornington Crescent Residents Association  
 National Grid  
 Natural England  
 Netley Primary School  
 Network Rail  
 New Diorama Theatre  
 New Horizon Youth Centre  
 NHS Camden  
 North Westminster Against HS2  
 Oakshott TRA  
 One KX Community Centre  
 One Prince of Wales Residents  
 Ossulston Estate 2 Leaseholders  
 Ossulston Tenants and Residents Association  
 Pan Arts  
 Pan Camden HS2 Alliance  
 Village and Environs Residents Association  
 Park Village East Residents  
 Peabody  
 Pheonix Court Community Tenants Association  
 Plot 10 Play Centre  
 Primrose Hill CAAC  
 Primrose Hill HS2 Reference Group  
 Quickwood Residents Association  
 Reachview Close Residents Association  
 Regent Square Residents Association  
 Regent's Canal CAAC  
 Regents Park  
 Regent's Park After School Club

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