

Euston Area Plan - Interim Sustainability Appraisal Report, 2022

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NON-TECHNICAL SUMMARY

1. Introduction

- 1.1 The EAP is an Area Action Plan which was adopted in 2015 and it provides a framework to guide development above the new Euston Station and in the surrounding area up to 2031. The EAP was jointly developed by Camden Council, the Greater London Authority and Transport for London. Camden Council adopted the Plan in January 2015 as a Local Plan document. The Mayor of London also adopted the Plan as supplementary planning guidance to the London Plan in January 2015.
- 1.2 It is a legal requirement for all local plans to be reviewed at least every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). As part of this review, it was noted that a number of key factors have changed since adoption in 2015 which triggered an update to the Euston Area Plan. These include Camden adopting the Camden Local Plan in 2017, the High Speed Rail (London – West Midlands) Act 2017 being passed (“the HS2 Act”) authorising construction of the first phase of HS2, Lendlease being appointed as Master Development Partner, updates to emerging plans for Euston Station by Network Rail and changes to Borough wide priorities including the declaration of a Climate emergency in 2019.
- 1.3 The background information for the EAP and the capacities identified were based on the station design constraints and information from 2013. This is now nearly 10 years out of date and designs have evolved, and in some cases constraints, funding, deliverability and requirements, have changed. Parts of the EAP have been implemented and the EAP update will reflect these changes.
- 1.4 Most of the existing policies in the EAP help to address most sustainability objectives outlined. There are numerous aspects of the EAP which are still relevant and do not require updating. In line with legislative and the National Planning Policy Framework (NPPF) requirements, policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Following a review of policies in the EAP, a full update is not recommended as outside of these key factors, the overarching principles of the original document still stand. Carrying out a full review would not be commercially justified or reasonable. A review of policies in the EAP, undertaken using the Planning Advisory Service’s toolkit, has identified that there should be a partial update to the EAP policies.
- 1.5 A partial update to the EAP is recommended to reflect changing circumstances at Euston. The complex nature of development at Euston means that designs and proposals are constantly evolving. Policies and evidence must be robust,

reflecting up to date information, constraints and opportunities. Ensuring that the plan and its evidence base is up to date will be crucial in helping to deliver the objectives in the EAP and SA sustainability objectives, the Camden Plan and assessing the planning application for Oversight Development. A partial update is considered to be the most efficient and effective way to ensure that policies are current and meet the optimum sustainability objectives.

- 1.6 If an update was not undertaken this would likely deem the EAP out of date and Legislation states that (among other reasons), in the absence of relevant up to date development plan policies, the balance is in favour of sustainable development. This means that planning permission should be granted except where the benefits of doing so are outweighed by any adverse impacts when assessed against the policies in the National Planning Policy Framework taken as a whole. This would considerably limit the Council's decision-making powers.
- 1.7 Whilst existing policies and site allocations in the existing EAP could be used to promote new housing, economic growth and environmental issues, they would not cover how these could be addressed in a comprehensive, up-to-date and integrated way at Euston. An updated Euston Area Plan provides the potential to guide more closely how enabled and funded development plots indicate where additional homes and employment uses could be delivered across the Euston area. For these reasons and in line with the National Planning Policy Framework, taking no action was not recommended. The update to the EAP allows policy changes to reflect the changes in situation on the site since previous adoption.

2 What is a Sustainability Appraisal?

- 2.1 As part of the process for preparing the Update to 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 the plan contributes to the achievement of sustainable development. The Scoping Report and Sustainability Appraisal for the 2015 EAP was produced using the policy framework of the Camden Core Strategy, Development Policies and Site Allocations DPDs (Development Plan Documents), which were adopted by Camden in October 2008.
- 2.2 The SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including 'equalities' and 'health' issues), with a view to avoiding and mitigating adverse effects and maximising the positives. The 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.
- 2.3 It is a requirement that the Sustainability Appraisal is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and

Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. In accordance with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan. More specifically, the SA Report must answer the following three questions:

1. What has Plan-making / SA involved up to this point? – Including with regards to consideration of 'reasonable alternatives'.
2. What are the SA findings at this stage? – i.e. in relation to the draft plan.
3. What happens next? – What steps will be taken to finalise the plan? – What measures are proposed to monitor plan implementation?

2.4 The Scoping report published in September 2021 was the first stage of the sustainability appraisal process which involved setting the context, identifying the baseline and producing sustainability objectives, namely setting the scope for the appraisal process. The report included a review of relevant policies, plans and programmes that relate to the Euston area; information on the baseline characteristics of the local area; consideration of the sustainability issues / problems and developed a framework for the future stages of the sustainability appraisal process, including the identification of sustainability objectives. Consultation was carried out with the following statutory bodies:

- Environment Agency
- Natural England
- Historic England

2.4 Consultation began on 30th September 2021 and comments were requested within 5 weeks. Responses to these were received from each body and the scoping report amended to reflect the comments made. These can be found in Appendix A. The Environment Agency suggested that land contamination was added to an SA objective 9 with Historic England suggested additional wording on the LVMF. Natural England did not have any specific comments on the Scoping report. The objectives have been revised to reflect the comments made.

2.5 Since the Scoping Report was drafted, initial data from the Census 2021 has been released. The only information released so far are the first population estimates. The Office for National Statistics will release further phased results from the census from January 2023 onwards. These will include data on ethnicity, religion, the labour market, education and housing. The Sustainability Appraisal will be updated further when data by small area has been released, relevant to the Euston area. It is noted that the data released will likely be significantly altered by the impacts of the Covid-19 pandemic with more transitory populations in the area at this time.

3 Overall outcome of the Sustainability Appraisal

3.1 The aim of this chapter is to explain the sets of alternatives that have been a focus of appraisal, with a view to demonstrating the 'reasonableness' of the

approach taken. The SEA Directive requires that reasonable alternative options are considered and tested. The SEA Directive requires that reasonable alternative options are considered and tested.

- 3.2 The SA has found that the draft update to the EAP 2023 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 EAP objectives against the SA Framework

- 3.3 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.
- 3.3 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 reasonable alternatives

- 3.4 Within the requirements of the Sustainability Appraisal there should be an appraisal of reasonable alternatives that take into account the objectives and geographical scope of the plan.
- 3.5 The previous SA for the 2015 EAP identified the following strategic options:
- 1) *Issue 1. Whether to produce an Area Action Plan for Euston*
 - 2) *Issue 2. Approach to level of growth*
 - 3) *Issue 3. Approach to location of growth*
 - 4) *Issue 4. Station design and development strategy options*
 - 5) *Issue 5 Approach to North Euston Cutting*
- 3.6 The adopted EAP (2015) was developed on the basis of a list of objectives, and that list of objectives has been refined and updated for the purposes of preparing the EAP Review. In light of these objectives, the decision has been taken to explore reasonable alternatives in respect of:
- i) Approach to level of growth targets
 - ii) Approach to land use, capacity and viability and building heights
- 3.5 Due to changes with station designs, HS2 moving ahead with construction on their station, additional site constraints and various key policy changes since the adoption of 2015 EAP, the context for Euston has changed. For this SA, a

number reasonable alternatives have been assessed. The Sustainability Appraisal has produced the following recommendations regarding the strategic options:

Issue 1: Approach to level of growth targets

Option 1a) Whether to leave growth according to Local Plan and previous EAP figures

Option 1b) Whether to decrease growth to align with site constraints

Option 1c) Whether to increase growth above previous EAP levels

Issue 2: Approach to land use depending on capacity and viability and building heights

Option 2a) Whether to leave land uses and building heights as shown in 2015 EAP

Option 2b) Whether to show additional heights specified to allow for additional capacity within LVMF

Option 2c) Whether to show additional heights beyond LVMF

Appraisal of strategic principles and development principles

3.6 The Overall strategy has not changed since the 2015 EAP. The EAP strategy 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, 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 delivery of the overall strategy there is a need to ensure that investment delivers benefits where they are most needed, maximising social value at planning, construction and end user phases plus ensuring that all aspects of development promote health and wellbeing and address concerns around safety and security.

3.7 The land use strategy would likely have a positive impact across the sustainability criteria, providing a balance of uses to meet a range of needs. The urban design strategy 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 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. The environmental strategy would be likely to provide a range of positive impacts due to improvements to energy and climate change mitigation. The Open Space strategy would give rise to social and local

environment benefits resulting from an emphasis on open space and green infrastructure

- The area based principles (Places) 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 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.

Health and wellbeing

- 3.8 The 2015 EAP makes reference to health and wellbeing with regard to supporting the provision of new open spaces and enhancements to existing spaces in order to contribute to health and wellbeing and provide amenity value for residents, visitors and workers. Previous policy CS16 in the Core Strategy sought to improve Camden's health and wellbeing. In the 2017 Local Plan, policy C1 (Health and wellbeing) states that measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate. The updated EAP land use strategy is to recognize the importance of Health and Well-being; Safety and Security and securing Inclusive Growth and delivering Social Value as cross-cutting themes throughout. Whilst the existing policy in the Local Plan seeks to reduce health inequalities,
- 3.9 Significant parts of the Euston area perform poorly in relation to health deprivation and disability and engagement with communities has shown the additional health problems associated with considerable amounts of construction in the area. In combination with the development plan and other planning guidance, the EAP policies will aim to engender a positive approach to health and well-being. The creation of healthy environments for people of all ages across the Euston area will be a key consideration when the Council assesses planning applications. Applications for major development at Euston will be required to include a Health Impact Assessment in consultation with the Council's Public Health Strategist.
- 3.10 Overall the addition of health and wellbeing focus to the EAP update as a crosscutting theme will meet more sustainability objectives than relying on existing policy

Safety and Security

- 3.11 In addition the updated EAP includes a section on safety and security within Strategic Principle EAP1. New development should play an active role in developing, long-term strategies to ensure that in design, management, streets and spaces are safe and enjoyable to use, particularly around the station and in quiet back streets in conversation with the community. This has been added to address frequent concerns following public engagement feedback with local communities that have highlighted longstanding concerns about crime and anti-social behaviour. In line with Local Plan policy C5 Safety and Security, all

development will need to incorporate measures which support Euston as a place that is safe, secure and inclusive. A robust approach to both design of development to minimise future potential for anti-social behaviour is expected.

- 3.12 The addition of safety and security theme to the EAP update enables this important topic to be emphasised throughout area policy for Euston.

Inclusive growth and delivering social value

- 3.13 In the 2015 EAP, social value themes were mentioned in terms of improving the lives of local people and communities. In the delivery of the Overall Strategy for the EAP update, it will be important to set out that investment delivers benefits where they are most needed, maximising social value at the planning, construction and end user phases, ensuring that all aspects of development promote health and wellbeing and address concerns around safety and security.
- 3.14 Significant parts of the Euston Area are included in the 10-20% most deprived LSOAs in England with below average earnings and lower educational attainment when compared to the Borough as a whole. Development at Euston should help to address these disparities. In order to ensure that investment at Euston delivers benefits where they are most needed, the Euston Social Value Charter has been developed by The Euston Partnership to ensure there is a commitment amongst member organisations and existing and future contractors and occupiers to support social, economic and environmental improvements in the wider Euston area, benefiting local communities and residents.
- 3.15 It is intended that the Social Value Charter for Euston will be in place throughout the lifetime of the project, during construction and when the development is built out. All major developments in the area will be expected to sign up to the Charter and commit to providing regular monitoring information.
- 3.16 The addition of social value as an underlying theme throughout the EAP update will meet a greater number of sustainability objectives.

The difference that the SA process has made in shaping the EAP update

- 3.17 As with the previous SA, this 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.

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

Vision for Euston

- 4.1 The 2015 EAP vision and objectives were informed by the results of public consultation (initial consultation in winter 2012 and draft EAP in summer 2013), conversations with stakeholders, previous aspirations for the area, research and specialist technical reports commissioned to inform the production of this plan.
- 4.2 The vision remains similar to the 2015 EAP however instead of a vision for Euston until 2031, the EAP seeks to provide a vision until 2047 to reflect more realistic development timeframes. It is suggested that no other changes to the vision are required.
- 4.3 In the 2015 EAP there were originally 11 objectives. These were adapted since first published to reflect consultation feedback, the Examination process and the results of the previous Sustainability Appraisal.
- 4.4 The EAP objectives have been now been updated to reflect changing circumstances and feedback from engagement. There are now nine objectives in the EAP, listed below:
- 1) **Prioritising local people's needs:**
This objective has been revised to ensure that development delivers economic, social and environmental benefits embedding Social Value into planning, construction and operational activities. The objective also ensures that people are made part of Euston's growth and that meanwhile uses create places and help to mitigate the impacts of construction.
 - 2) **Securing excellent design:**
This objective has not changed.
 - 3) **Making the best use of new space above the station and tracks and opportunities for regeneration in the wider area:**
This objective has been revised to ensure that the station and interchange redevelopment also enables comprehensive development of the area above the station and tracks.
 - 4) **New streets above the station and tracks**
This objective has been revised to highlight that it is integral that legible and attractive access to the new development should be provided above the station to address existing difficulties.
 - 5) **Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the objectives of the Knowledge Quarter inclusive innovation objectives:**
This objective has been revised to ensure that new growth and positive change support the objectives of the Knowledge Quarter inclusive innovation objectives. This is to ensure that the comprehensive redevelopment of Euston Station helps to transform the image of Euston as a nationally important high quality transport interchange with integrated and well-designed development which contributes fully to the local, regional and national economy. The

objective seeks to ensure that Euston provides a front door to the Knowledge Quarter Innovation District and new spaces for existing and new businesses and shops, complimenting the existing Knowledge Quarter eco-system, supporting creative industries, securing significant new job and training opportunities for local people. References to Med City vision have been removed.

6) **Creating sustainable development:**

This objective has removed references to local low carbon energy networks and highlights that development must respond to the climate crisis by ensuring Euston be a place that is perceptibly green in all respects and which integrates high environmental standards, active and sustainable travel, planting, biodiversity, an integral network of open spaces and green infrastructure, supporting a circular economy and contributing to improvements in air quality.

7) **Improving the environment along Euston Road:**

The revisions to this objective include additions of creating an emblematic and landmark point of arrival to Euston and London that is inviting, draws in visitors and actively facilitates movements of people and goods safely prioritising safe and inviting pedestrian links, legible and well-connected from all points, with improved crossing opportunities reducing the barrier between the north and south balanced with high quality and reliable bus provision throughout. Providing a green artery with much improved air quality that is accentuated by trees and restored and green Euston Square Gardens, a street whose public realm reflects the range of character areas and enhances world-class knowledge and innovation institutions along its length.

8) **Promoting sustainable and active travel**

This objective has been revised to include “active” travel and ensure that it is easier and safer to walk and cycle along and across the main streets of Euston. To reduce air pollution and noise, reduce all road casualties and improve the pedestrian and cyclist experience on the streets. This would be achieved through greening, improved infrastructure for pedestrians and cyclists and reduce the dominance of motor vehicles.

9) **Enhancing existing public transport:**

This objective has been revised to include adequate land safeguarded for new transport infrastructure such as Crossrail 2.

From the 2015 EAP, the following objectives have been merged into existing objectives.

10) Planning for future public transport.

This objective has been amalgamated into objective 9 above.

11) Deliver a new world class Euston station and integrated development.

This objective has been amalgamated into objectives 3 and 5.

5. METHODOLOGY

5.1 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 as well as the SA for the 2015 EAP.

- 5.2 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.

The Sustainability Appraisal Framework

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 used in the SA of the EAP 2015.

Table 3.1 Attributing effects to each objective	
++	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

6. BASELINE, CONTEXT AND SUSTAINABILITY ISSUES AND OBJECTIVES

- 6.1 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.

Review of relevant plans programmes and sustainability objectives

6.2 Table 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 2 to the 2021 Scoping Report which provides a review of additional plans, policies and programmes.

Table 1 Relevant plans, programmes and sustainability objectives

	Ref No.	Document title
National	1	National Planning Policy Framework 2021 National Planning Practice Guidance
	2	Implementing the Sustainable Development Goals 2019
	3	The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting
	4	A Green Future: Our 25 Year Plan to Improve the Environment, DEFRA 2018
	5	Clean Air Strategy 2019
	6	Waste Management Plan for England 2021
	7	Our Waste, Our Resources: A strategy for England 2018
	8	The Historic Environment in Local Plans: 1
	9	Managing Significance in Decision Taking in the Historic Environment: Good Practice Advice Note 2
	10	Conservation Area Designation, Appraisal and Management (Historic England, 2019) Historic Advice Note 1 (second edition)
	11	The Setting of Heritage Assets – 2 nd Edition (Historic England, 2017)
	12	Tall buildings Historic England Advice Note 4 (2015)
	13	Biodiversity 2020: A strategy for England's wildlife and ecosystem services (revised 15 th October 2020)
	14	The Community Infrastructure Levy Regulations 2010 and amendments 2019
	15	Thames Abstraction Licensing Strategy (Environment Agency, 2019)
	16	Fair Society, Healthy Lives - The Marmot Review (post-2010)
	17	Land contamination risk management (LCRM) 2021
	18	Noise action plans: large urban areas, roads and railways (2019) Environmental Noise (England) Regulations 2006
	19	BREEAM
	20	Home Quality Mark
	21	Passivhaus
	22	Energy White Paper: Powering our net zero future Updated 18 th December 2020
	23	Future of Mobility: Urban Strategy Moving Britain Ahead March 2019 (Department for Transport Industrial Strategy)
	24	Safer Places: The Planning System and Crime Prevention (Home Office/ODPM 2004)

	25	Planning policy for traveller sites 2012
	26	Gear Change A bold vision for cycling and walking
Regional	27	The London Plan 2021

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(London)	28	Mayor's Transport Strategy 2018	
	29	Economic Development Strategy 2018	
	30	London Housing Strategy 2018	
	31	Housing in London 2020 The evidence base for the London Housing Strategy	
	32	Good Quality Homes for all Londoners - consultation draft (October 2020)	
	33	Homes for Londoners: Affordable Housing and Viability SPG 2017	
	34	London's Environment Strategy 2018	
	35	London Health Inequalities Strategy 2018	
	36	London Sustainable Drainage Action Plan, 2016	
	37	London Infrastructure Plan 2050	
	38	Accessible London: Achieving an inclusive environment (GLA 2014)	
	39	Capital Gains: A Better Land Assembly model for London 2018	
	40	The Mayor's Sustainable Design and Construction: SPG 2014	
	41	Social Infrastructure SPG, 2015	
	42	Shaping neighbourhoods – play and informal recreation SPG 2012	
	43	Shaping neighbourhoods: character and context 2014	
	44	London View Management Framework SPG 2012	
	45	Mayor London's Culture Strategy 2018	
	46	Culture and the Night-Time Economy SPG 2017	
	47	Crossrail Funding SPG updated March 2016	
	48	The Control of Dust and Emissions during Construction and Demolition SPG (July 2014)	
	Local (Camden)	49	Camden 2025
		50	Our Camden Plan
		51	Camden Local Plan 2017
		52	Camden Planning Guidance
		53	Camden Site Allocations
		54	Camden Infrastructure Study June 2019
		55	Camden Conservation Area Appraisals
56		Camden Character Study 2015	
57		Camden SHMA 2016	
58		Financial Viability Study, BNP Paribas 2016	
59		Employment Land Study 2014	
60		Camden Retail and Town Centre Study 2013 - GVA	
61		Gypsy and Traveler and Travelling Showpeople Accommodation Assessment ORS 2014	
62		Camden 2019-2022 Clean Air Quality Action Plan	
63		Strategic Flood Risk Assessment 2014	
64		London Borough of Camden Annual Monitoring Report	
65		Camden Housing Delivery Test Action Plan 2020	
66		North London Waste Plan	

67	Camden Joint Strategic Needs Assessment 2019
68	Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041
69	Camden Biodiversity Action Plan
70	Camden Climate Action Plan 2020-2025
71	Annual School Places Planning Report (Primary and Secondary) 2019
72	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
73	Camden Reduction and Recycling Plan 2018-2022
74	Camden Carbon Scenarios for 2025 and 2030 - An update to the 2010 Study 2019

Baseline characteristics

6.3 Baseline information for the borough of Camden was established in the SA Scoping Report from the Camden Local Plan 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 Appendix 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*)
- 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

6.4 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 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. Appendix D (at the end of the document) shows the list of criteria and potential indicators relative to each SA objective.

Table 2 Baseline indicators

Environmental indicators	
Transport and traffic (commentary will be included to reflect potential impacts of Covid-19)	<ul style="list-style-type: none"> • Location of major transport demand generating developments • Number of agreements signed for car-free or car capped housing • % reduction in motor traffic flows through the borough • Proportion of resident trips by walking or cycling • % 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 • Designated and non-designated heritage assets • Heritage at risk • Extent of archaeological priority areas • Number and condition of scheduled ancient monuments
Open space	<ul style="list-style-type: none"> • Open spaces • Open space deficiency • Open space lost as a result of HS2 works • Area of designated open space /improvements to open space • 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"> • Water quality • %/Number of new developments incorporating water conservation measures (e.g. SUDS) • Water use • Number of properties at risk from 1% and 0.1% Floods
Noise and vibration	<ul style="list-style-type: none"> • Number of noise complaints received by the Council • Number of important areas 'noise hotspots' defined by Defra
Climate factors	<ul style="list-style-type: none"> • Carbon dioxide emissions • Climatic events • Proportion of energy generated from renewable sources • Domestic energy efficiency
Recycling and waste management	<ul style="list-style-type: none"> • % of household waste recycled
Development on previously developed land	<ul style="list-style-type: none"> • % of 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 • Population density (persons/ha) • Household projections
Health and community	<ul style="list-style-type: none"> • Healthy life expectancy • Major causes of death • People using outside space for health/exercise • Proportion of active adults • Excess weight in adults • Excess weight in 4-5 and 10-11 year olds • Air quality health impacts • Camden Primary healthcare estate • Accommodation for older people • Accommodation for people with extra/complex needs • Levels of crime • People with limiting long term illness

	<ul style="list-style-type: none"> • Distance of households from GPs and hospitals/ access to GP per 1000 • Number of GPs or primary care professionals in Camden • Number of sports/playing fields and outdoor recreation spaces • Number of hostels and care homes
Deprivation and social exclusion	<ul style="list-style-type: none"> • Household income • Number of Super Output Areas (SOAs) within 10% most deprived in England • Life expectancy • Fuel poverty • Claimant count unemployment rate • Households with children in families on key benefits • Unemployment by ward
Education	<ul style="list-style-type: none"> • Area of new education facilities created • School capacity (pupil place calculation) and areas of education provision deficiency • Number of NEET's (young people not in education, employment and training)
Housing	<ul style="list-style-type: none"> • Housing stock by tenure • Dwellings by type • Overall need • Housing composition • Condition of housing stock – unfit dwellings by tenure, overcrowded households • House prices and rents • Ratio of average house price to earnings • Housing with special needs • Number of new homes completed • Student housing completions • Affordable housing completions • Mix of housing sizes • Vacant housing units • Number of affordable housing completions • %/number of all new housing units designed with Part M wheelchair accessibility
Town Centres and Employment	<ul style="list-style-type: none"> • Completed retail, food, drink and entertainment floorspace • Vacancy in town centres and other designated frontages • Retail, food, drink and entertainment uses • Employment floorspace completed and available • Growth areas projected floorspace • Industrial structure and key sector • Supply of employment land • Number of secured apprenticeships in Camden

6.5 Appendix 4 of the EAP Scoping 2021 for the EAP update set out the updated detailed baseline, updating the baseline information provided in the SA for the 2015 EAP.

Key sustainability issues

6.6 Building on the review of plans, programmes and sustainability objectives and the baseline information, the SA Scoping Report for the Euston Area Plan update 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 3 below.

Table 3 Sustainability issues for the Euston Area Plan update to address

Issue	Summary and Source of Evidence
Environmental	
Development pressures and protecting the historic environment	<p>There are three Conservations Areas within and adjacent to the Euston Area Plan boundary, along with a number of listed buildings.</p> <p>There are also many designated and non-designated heritage assets within and in areas adjacent to the Area Plan boundary some of which could be affected by development in the area.</p> <p>There is one Tier 2 Archaeological Priority Area (Cumberland Market) within the EAP boundary.</p> <p>The Council needs to ensure that development does not cause harm to the significance of heritage assets and where possible enhances their character and appearance.</p>
Promoting zero carbon Camden by 2030 with energy efficiency and renewable energy. Where there are significant travel-demand generating uses, sustainable and active modes of travel should be encouraged, enabled and prioritised in these locations. Reducing carbon dioxide emissions to meet the Borough's targets and mitigating the effects of climate change.	<p>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 (NPPF).</p> <p>In November 2019, Camden Council formally declared a Climate and Ecological Emergency, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and committed to do everything it can to make Camden net zero carbon by 2030</p> <p>Government data for 2017 (the latest national dataset available) shows that</p>

	<p>'direct' carbon dioxide emissions in Camden have reduced by 39% since 2005. Data for 2018 will be published in July 2020 and is expected to show that Camden has met the 40% borough wide target set in Green Action for Change.</p>
<p>Limited scope for creating new open space. There is a deficiency of open space in the Euston area in terms of accessibility of high quality usable open spaces.</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. 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>Open spaces have been lost in the Euston Area due to HS2 construction works, in particular the loss of St James's Gardens and temporary loss of Euston Square Gardens.</p>
<p>Need to effectively recycle and manage waste from construction projects to conversion of existing buildings using Circular Economy principles.</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.</p>
<p>Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter.</p>	<p>Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe.</p> <p>In 2019 there were an estimated 91 attributable deaths in Camden due to small particles (PM_{2.5}) and an estimated 173 attributable deaths due to nitrogen dioxide (NO₂) giving a total of 264 attributable deaths across the Borough each year.</p> <p>Camden has three automatic monitoring station monitoring nitrogen dioxide and particulate matter of which one is located as a roadside monitor at Euston Road. The Euston Road experienced exceedances of the hourly mean objective for nitrogen dioxide levels in 2017.</p> <p>The key areas linking planning and air quality are road transport, construction, energy generation, and the operation of certain industrial processes. Each serves as</p>

	<p>a source of pollution emissions that should be mitigated. It is important that the planning system plays its part in helping reduce emissions in the borough. Camden is working to address this issue by: reducing transport emissions, reducing emissions from buildings and new developments.</p> <p>Camden's Air Quality Action Plan 2019-2022</p> <p>Camden Public Health Outcomes Framework 2017</p>
<p>Potential contamination on previously developed land</p>	<p>While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough have been previously utilised for heavy industry and other polluting uses and this may pose contamination problems for future development on such sites, especially given development is on previously developed land.</p> <p>There are no historic watercourses in the Euston area and the area is just outside a Local flood risk zone.</p>
<p>Risk of surface water and groundwater flooding in parts of Camden due to increase in the amount of built land</p>	<p>Although there are no areas at risk of flooding from rivers or the sea there are approximately 38,800 properties in the Camden within areas at risk of surface water flooding at potential depths of >0.1m, and 12,700 properties in areas at risk of flooding to potential depths of >0.3m. (Environment Agency)</p> <p>The proportion of developed land (impermeable surfaces) in Camden increases surface water flooding risks, so it is important that development considers appropriate measures of drainage.</p>
<p>Water supply and use</p>	<p>Camden is within Thames Water's London Water Resource Zone which is classified as 'seriously water stressed.' This means there is a high population with high water demands and limited water availability. Currently water use accounts for 27 percent of all carbon emissions from our homes. In London non-households accounts for 29 percent of water consumption and this is</p>

	<p>therefore an area where further water and carbon savings can be made.</p>
<p>There should be no further decline in priority species and we need to seek ways to protect and enhance/increase their habitats.</p>	<p>Camden Biodiversity Action Plan identified priority species. Need to ensure that priority species do not further decline in the borough and receive adequate protection and encouragement through the planning process.</p> <p>There are 4.56ha of sites that are managed for nature conservation in Camden. Existing Sites of Important Nature Conservation provide important habits for priority species and other flora and fauna in the borough, which need to be protected from future development.</p>
<p>Increased pressure on waste management facilities</p>	<p>The increase in the population of the Euston area in the future will place increased pressure on existing waste management facilities and highlights the need to ensure waste is managed efficiently and where possible reduced, reused and recycled.</p>
<p>Sustainable design and use of resources</p>	<p>Improvements in building design is needed will to 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.</p>
<p>Social</p>	
<p>Meeting the housing needs of ever changing and expanding population</p>	<p>The number of people living in Camden is increasing and the makeup of the borough's population is changing. Camden Local Plan aims to meet need of existing and future households by exceeding a target of 16,800 additional homes 2016/17 - 2030/31, including 11,130 additional self-contained homes. In 2019 it was estimated that Camden's population would increase by 4% over the next 10 years.</p> <p>The GLA population projections forecast growing proportion in the 65 plus age group, a changing age structure with fewer younger children.</p> <p>Housing need includes these groups in Camden: general needs housing, accommodation for students, older and vulnerable people and traveller accommodation.</p>

<p>The affordability of housing and the supply of affordable housing in the Euston area</p>	<p>The ratio of average house prices to average earnings for Camden in 2017 was 18.97 (i.e. average house prices are 18.97 times median earnings). This compares with 13.24 across London overall, and 7.77 across England and Wales. The cost of housing relative to income is a major issue for Camden.</p> <p>The Council aims to exceed a borough strategic target of 5,300 additional affordable homes 2016 – 2031 with a mix of housing types.</p>
<p>Wide disparities between deprived and affluent areas in the Euston area</p>	<p>There are wide disparities of deprivation and affluence within Euston area wards compared to the rest of the Borough. Mean Incomes at ward-level show the lowest income level is in St Pancras and Somers Town ward with £29,935 compared to the highest mean income in Frognal and Fitzjohns ward with £57,477.</p> <p>Camden's mean annual household income is higher than that of Greater London's average, but there is significant disparity between wards within Camden.</p> <p>Camden has seen a mixed change since the 2010 Index of Multiple Deprivation to 2015 data (less deprived in some measures and more deprived in others. There are very wide disparities within the Borough and wards.</p> <p>The proportion of children living in low income families is significantly higher in St Pancras and Somers Town compared to other ward areas in Camden. (Source: Personal tax credits: Children in low-income families local measure, 2016)</p>
<p>Large health inequalities within Camden</p>	<p>People suffering from poor general health, mental ill health and low life expectancy are generally concentrated in the borough's most deprived wards including St Pancras and Somers Town.</p> <p>For local health and wellbeing it is important that Camden continues to provide measures to help reduce car use and promote more sustainable and active forms of travel.</p>

	<p>21% of children in Reception and 36% of children in Year 6 in Camden are overweight or obese. As of 2017/18, Camden has a similar prevalence of excess weight in year 6 children, compared to London and England.</p>
Poor housing conditions and overcrowding	<p>There are an estimated 13,979 households in Camden are overcrowded. (Source: 2011 Census, Department for Communities and Local Government, 2017/18)</p>
Education inequalities and increased demand for school places	<p>71% of 5 year olds in Camden are reaching a 'good level of development' at the end of reception. It is significantly lower in Camden compared to the London average (74%). PHE, 2019 Growth in the Euston and King's Cross areas will generate demand for additional school places/ facilities (source: Camden Children, Schools and Families).</p>
Reduce levels of crime and fear of crime	<p>Camden has the 13th highest rate of violent crime offences out of the 33 London boroughs (source: PHE 2019)</p>
Economic	
Unemployment and Job Opportunities for local people	<p>There are significant disparities in employment between different wards in Camden, in that some wards in Camden rank very high in unemployment, whereas others rank very low. (source DWP Claimant Count, December 2017). In 2017 about one in ten people aged 16 to 64 years are claiming an out-of-work benefit in Camden (8%). Camden has the 9th highest proportion of out-of-work claimants in London (7%). (Source: DWP, accessed the 7th of September 2017)</p>
Need to support development in existing centres and ensure the health of town centres.	<p>Vacancy of units has increased in the last two years, and will be further exacerbated by the longer term impacts of Covid-19.</p>
Ensure range of provision for employment clusters to accommodate need	<p>The key employment sectors experiencing growth are: professional, scientific and technical, business administration and support, and health. The employment sector with the greatest proportionate decrease has been manufacturing and transport storage. (Employment Land Review, 2014).</p>

	<p>Science and technology employment sector has grown significantly in Camden (one third of jobs in the borough, which is the highest concentration of any LA area in the UK). Euston and surrounding area is part of the Knowledge Quarter (a concentration of medical, educational, cultural and research institutions)</p>
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The Sustainability Appraisal Framework

- 6.7 The SA Scoping Report established the appraisal framework for the sustainability appraisal of the Euston Area Plan update. 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 EAP 2015, taking into account changes over time and Euston-specific circumstances.
- 6.8 The following set of 16 objectives (in table 4 below) set out in the Scoping Report provide the framework for assessing the sustainability of the EAP.

Table 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 and leisure facilities.
4	To tackle poverty and social exclusion
5	To improve amenity by minimising the impacts associated with development.
6	To conserve and improve open space provision and increase access to and enhancement of open space.
7	To improve local air quality and limit exposure.
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.

11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area
12	To promote high quality and sustainable urban design.
13	To protect and enhance the historic environment
14	To ensure new development makes efficient use of land, buildings and infrastructure.
15	To encourage and accommodate sustainable economic growth and employment opportunity.
16	To maximise the benefits of regeneration and development to promote sustainable communities.

6.9 The objectives from the 2015 EAP are listed in Appendix 7 of the EAP SA Scoping Report 2021 however have been divided into Environmental, Social and Economic and been reordered to take and revised into account the SALP SA objectives. Broadly the objectives are the same as 2015 objectives but the open space objective has been split into two objectives (objectives 3 and 6). Appendix 7 of the Scoping Report highlights the changes in the EAP objectives.

7. TESTING EAP OBJECTIVES AGAINST THE SA FRAMEWORK

7.1 A series of objectives were developed to deliver the vision for Euston and to guide the change in the area. These objectives have been refined and revised since 2015 EAP to reflect changes in policy emphasis, the results of the SA process and to reflect consultation feedback. The draft EAP objectives are set out below:

1. Prioritising local people's needs:

To ensure that new development meets local needs, providing new homes, jobs, businesses, community facilities and open space lost or affected by HS2, are reprovided in the Euston area. Development must deliver economic, social and environmental benefit embedding Social Value into planning, construction and operational activities. Development must ensure that people are made part of Euston's growth and that meanwhile uses create places and help to mitigate the impacts of construction.

2. Securing excellent design:

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

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

To ensure that that the station and interchange redevelopment also enables comprehensive development of the area above the station and tracks and 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 through 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. Providing legible and attractive access to the new development above the station will be integral to addressing existing difficulties.

5. Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the objectives of the Knowledge Quarter inclusive innovation objectives:

To ensure that the comprehensive redevelopment of Euston Station helps to transform the image of Euston as a nationally important high quality transport interchange with integrated and well-designed development which contributes fully to the local, regional and national economy. Providing a front door to the Knowledge Quarter Innovation District and new spaces for existing and new businesses and shops, complimenting the existing Knowledge Quarter eco-system, supporting knowledge and medical and creative industries, securing significant new job and training opportunities for local people.

6. Creating sustainable development:

To plan for carbon free sustainable development and enhance the quality and sustainability of the local environment. Responding to the climate crisis, Euston should be a place that is perceptibly green in all respects and which integrates high environmental standards, active and sustainable travel, planting, biodiversity, an integral network of open spaces and green infrastructure, supporting a circular economy and contributing to improvements in air quality.

7. Improving the environment along Euston Road:

To create an emblematic point of arrival to Euston and London that is inviting, draws visitors and actively facilitates movements of people and goods safely prioritising safe and inviting pedestrian links, legible and well-connected from all points, with improved crossing opportunities reducing the barrier between the north and south balanced with high quality and reliable bus provision throughout. Providing a green artery with much improved air quality that is accentuated by trees and restored and green Euston Square Gardens, a street whose public realm reflects the range of character areas and enhances world-class knowledge and innovation institutions along its length.

8. Promoting sustainable and active 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. In particular making it easier and safer to walk and cycle along and across Euston Road, Eversholt Street and Hampstead Road. To reduce air pollution and noise,

substantially reduce all road casualties and improve the pedestrian and cyclist experience on these streets, through greening, improved infrastructure for pedestrians and cyclists and reducing the dominance of motor vehicles.

9. Enhancing existing public transport:

To provide improvements to Underground services, station, bus and taxi facilities and particularly new entrances into the station to the north, east and west. Adequately safeguard land for new transport infrastructure such as Crossrail 2.

Summary of findings

7.2 A detailed assessment of the Strategic Objectives is found in Appendix B and the justification for the changes to the objectives listed below. Overall the strategic objectives achieve the aim of sustainable development. There are not considered to be any significant conflicts between the EAP objectives and the sustainability framework. It will be important that one objective does not outweigh or preclude achievement of another objective however it is recognised that it will be a balancing act to meet a range of aims.

Social impacts

7.3 As with the previous Sustainability Appraisal for the 2015 EAP, the strategic objectives will have considerable positive social impacts. There are several objectives that aim to address key social issues including

- Further mitigating the loss of any homes, jobs and open space 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;
- improving connectivity and enhanced permeability by the new streets above the station and tracks would improve the lives of local people and their access to local facilities.
- The promotion of active and sustainable travel will improve the health and wellbeing of local people.

Environmental impacts

7.4 The draft objectives of the SA 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
- Specific objectives to promote sustainable and active travel help to promote alternatives to private transport.

Economic impacts

7.5 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:

- 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
- 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.

Conclusion

7.6 The Euston Area Plan updated 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.

7.7 It is important that the policies contained within the Euston Area Plan update 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 below.

8. APPRAISAL OF THE EUSTON AREA PLAN STRATEGIC OPTIONS

8.1 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.

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

Issue 1. Approach to level of growth

- Option1a) Whether to leave growth targets according to Local Plan and previous EAP figures
- Option 1b) Whether to decrease growth targets to align with site constraints

Issue 2: Approach to land use depending on capacity and viability and building heights

- Option 2a) Whether to leave land uses and building heights as shown in 2015 EAP
- Option 2b) *Whether to prioritise the creation of knowledge economy floorspace over other employment floor space, including offices and maximise height within the LVMF..*
- Option 2c) Whether to show additional heights beyond LVMF

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		0	0
3	To ensure access to local shopping, community and leisure facilities.		+	+-
4	To tackle poverty and social exclusion		0	0
5	To improve amenity by minimising the impacts associated with development.		+-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-
7	To improve local air quality and limit exposure.		+-	+-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		+-	+-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		++	++
12	To promote high quality and sustainable urban design.		++	++
13	To protect and enhance the historic environment		+-	+-
14	To ensure new development makes efficient use of land, buildings and infrastructure.		++	+
15	To encourage and accommodate sustainable economic growth and employment opportunity.		++	+

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		0	0
3	To ensure access to local shopping, community and leisure facilities.		+	+-
4	To tackle poverty and social exclusion		0	0
5	To improve amenity by minimising the impacts associated with development.		+-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-
7	To improve local air quality and limit exposure.		+-	+-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		+-	+-
16	To maximise the benefits of regeneration and development to promote sustainable communities.		+	+

Commentary

Issue 1. Approach to level of growth

Option 1a) Whether to leave growth according to Local Plan and previous EAP figures

8.8 Euston was designated as a growth area in the Camden Core Strategy and Camden policies identified the potential for around 1500 homes and 70,000sqm of business space with a range of 20-30,000sqm of additional retail at Euston and Camden Town. With the potential construction of HS2, significant potential

higher levels of growth were identified in the Local Development Framework. The level of growth in the EAP update provides for the Euston area an opportunity to address existing issues in terms of deprivation, education and unemployment around Euston. With HS2 construction in progress, following the HS2 Act being adopted in 2017, there is an expectation that growth will exceed that outlined in the 2015. There are however a number of constraints on the site that alter the amount of growth that is possible.

Option 1b) - Whether to decrease growth targets to align with site constraints

- 8.9 There are various site constraints that limit development over and around Euston station. There is currently uncertainty around the delivery of the redevelopment of the Network Rail station and the capacity to enable development over the throat and tracks. This reduces the amount of land that can be enabled for development and thus reduces the amount of growth that could be possible over the stations. It is recognised that there are significant benefits to facilitating growth not just related to the station, but in the wider area, particularly in terms of opportunities to achieve regeneration objectives in surrounding estates and wider environmental improvements. New housing has been created on the Regents Park Estate (RPE) following HS2 construction works to mitigate for the loss of housing. There is potentially some scope for further housing and redevelopment and/or retrofit of existing buildings on the RPE however there are limited sites remaining.
- 8.10 To the east of Euston station, the Somers Town Community Investment Programme has been developed by Camden Council to address how growth and investment can be best coordinated to deliver maximum benefits for the communities in the Somers Town area over a 15 year period. New housing has been created on the Regents Park Estate (RPE) following HS2 construction works to mitigate for the loss of housing. There is some scope for further housing and redevelopment and/or retrofit of existing buildings on the RPE however there are limited sites remaining for redevelopment.
- 8.11 The site constraints and uncertainty around the redevelopment of the Network Rail station limit the amount of development that can be achieved and therefore the existing levels of growth cannot be achieved. As such an increase in growth against previous EAP levels is also not possible.
- 8.12 All growth options identified may generate negative outcomes in relation to waste and use of non-renewable resources and amenity given the impacts of construction. Policies to address these issues where possible in the Euston Area Plan help to mitigate these impacts.

Issue 2: Approach to land use depending on capacity and viability and building heights

- Option 2a) Whether to leave land uses and building heights as shown in 2015 EAP
- Option 2b) Whether to show additional heights specified to allow for additional capacity within LVMF
- Option 2c) Whether to show additional heights beyond LVMF

Sustainability Objectives		Options	2a	2b	2c
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 and leisure facilities.		+	++	+-
4	To tackle poverty and social exclusion		+	+	+
5	To improve amenity by minimising the impacts associated with development.		+-	+-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-	-
7	To improve local air quality and limit exposure.		-	-	-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		-	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		-	-	-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	-	-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+-	+	+
12	To promote high quality and sustainable urban design.		+	+	+
13	To protect and enhance the historic environment		0	0	0
14	To ensure new development makes efficient use of land, buildings and infrastructure.		+	+	+
15	To encourage and accommodate sustainable economic growth and employment opportunity.		+	++	++

Sustainability Objectives		Options	2a	2b	2c
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 and leisure facilities.		+	++	+-
4	To tackle poverty and social exclusion		+	+	+
5	To improve amenity by minimising the impacts associated with development.		+-	+-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-	-
7	To improve local air quality and limit exposure.		-	-	-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		-	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		-	-	-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	-	-
16	To maximise the benefits of regeneration and development to promote sustainable communities.		+	+	+

Commentary

Issue 2: Approach to land use depending on capacity and viability and building heights

Option 2a) Whether to leave land uses and building heights as shown in 2015 EAP

Option 2b) *Whether to prioritise the creation of knowledge economy floorspace over other employment floor space, including offices and maximise height within the LVMF..*

Option 2c) Whether to show additional heights beyond LVMF

Option 2a) Whether to leave land uses and building heights as shown in 2015 EAP

- 8.13 The EAP 2015 identified that a mix of uses including a significant amount of residential floorspace should be provide. The Plan identifies that between 180,000 sqm and approximately 280,000 sqm of new employment/economic floorspace, providing between 7,700 and approximately 14,100 jobs could be delivered encouraging knowledge based, research and creative uses to strengthen Euston's existing role as a knowledge and research hub. This was in addition to between 2,800 and approximately 3,800 additional homes along and 20,000sqm of retail floorspace focused around the station as well as education, health and other community facilities to support development.
- 8.14 As discussed above the land uses depend upon the certainty surrounding the Network Rail design and technical changes since 2015 with regard to enabling of sites which will effect long term viability. Areas of deck have not been enabled for development above and additional voids are required in the decks for functional station requirements.
- 8.15 Housing remains a priority land use for the Council however viability and site constraints issues may affect how land uses are distributed and will reduce the amount of growth for the area. Additional issues that have arisen include enfranchisement which limits the locations for new housing.
- 8.16 The EAP 2015 set out maximum heights that were appropriate for new development areas, based on an analysis of the surrounding built context and modelling of potential impacts on strategic views. These heights would allow development that does not encroach into the Protected vistas identified in the London View Management Framework (LVMF) however it was recognised that there may be impacts on local heritage assets which would need addressing. The 2015 EAP recognised that there was potential locations for tall buildings in the shadows of St Pauls Cathedral. In order to fully protect the strategic views and local heritage assets, development at lower heights than the EAP 2015 suggested would deliver overall less growth which means fewer jobs and new homes.

Option 2b) Whether to prioritise the creation of knowledge economy floorspace over other residential and commercial floorspace, including offices and maximise height within the LVMF..

- 8.16 Given the location of Euston in the Knowledge Quarter (KQ), the area provides a major opportunity to attract high value knowledge based employment and activity in the science, innovation and educational sectors. Euston lies at the heart of the KQ, as a unique cluster of academic, cultural, research, and scientific organisations, which have been attracted to the area by the excellent transportation links, highly skilled workforce, high-quality office and lab spaces, concentration of knowledge economy organisations, and outstanding retail, art and leisure offer. The Council will continue to support the Knowledge Quarter

and prioritise employment floorspace for the knowledge economy however the need for housing is considered to be a priority land use.

- 8.17 Despite the need for commercial space for viability reasons, there is a great need for affordable housing in the borough with a particular need for affordable family housing and intermediate housing in the area. Housing remains a priority land use in the Camden Local Plan. Housing projections in the updated Euston Area Plan indicates lower delivery than that identified in the 2015 EAP, the London Plan and the Camden Local Plan reflecting more accurate capacities identified through masterplanning work as a result of additional site constraints, costs and viability issues.
- 8.18 By maximising height of development in the Euston area this would enable additional number of homes and jobs created to those identified in the 2015 EAP which would benefit local communities and meet demand. However this would have significant impacts on the skyline of London, exceed the heights specified in the LVMF, harm heritage assets and not respond to the context of their locations. The amenity impact of tall buildings would be great for those living in close proximity. It is also recognised that tall buildings tend to use more energy and emit more carbon than lower rise equivalents.
- 8.19 In terms of the above options meeting sustainability objectives, taller buildings can have a negative impact on the amenity of local communities and would likely not improve local air quality or sustainability efficiency. It is not considered to be an option to go beyond the policy framework of the LVMF.
- 8.20 Overall the options appraised above would not address issues outside land use. Housing is a key land use and would meet additional sustainability objectives.

Option 2c) Whether to show additional heights beyond LVMF

- 8.21 By maximising height of development in the Euston area this would enable additional number of homes and jobs created to those identified in the 2015 EAP which would benefit local communities and meet demand. However this would have significant impacts on the skyline of London, exceed the heights specified in the LVMF, harm heritage assets and not respond to the context of their locations. The amenity impact of tall buildings would be great for those living in close proximity. It is also recognised that tall buildings tend to use more energy and emit more carbon than lower rise equivalents.
- 8.22 In terms of the above options meeting sustainability objectives, taller buildings can have a negative impact on the amenity of local communities and would likely not improve local air quality or sustainability efficiency

Sustainability Objectives	Options	3a	3b	3c
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8.22

Sustainability Objectives	Options	5a	5b
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 and leisure facilities.	0	0
4	To tackle poverty and social exclusion	+	++
5	To improve amenity by minimising the impacts associated with development.	+	++
6	To conserve and improve open space provision and increase access to and enhancement of open space.	0	0
7	To improve local air quality and limit exposure.	+	++
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+	++
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	-	+-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	++

Sustainability Objectives		Options	5a	5b
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 and leisure facilities.		0	0
4	To tackle poverty and social exclusion		+	++
5	To improve amenity by minimising the impacts associated with development.		+	++
6	To conserve and improve open space provision and increase access to and enhancement of open space.		0	0
7	To improve local air quality and limit exposure.		+	++
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+	++
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	+-
12	To promote high quality and sustainable urban design.		+	++
13	To protect and enhance the historic environment		+	+-
14	To ensure new development makes efficient use of land, buildings and infrastructure.		+	++
15	To encourage and accommodate sustainable economic growth and employment opportunity.		+	++

9. APPRAISAL OF THE STRATEGIC PRINCIPLES AND DEVELOPMENT PRINCIPLES

9.1 Following on from the assessment of reasonable alternatives, 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 Local Plan, Camden 2025 and other Council plans and strategies; and
- other relevant plans and policies.

9.2 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 C to this report.

Preferred options and main policy alternatives.

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 and leisure facilities.		++
4. To tackle poverty and social exclusion		++
5. To improve amenity by minimising the impacts associated with development.		++
6. To conserve and improve open space provision and increase access to and enhancement of open space.		++
7. To improve local air quality and limit exposure.		++
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout		++

the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	++
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	++
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++
12. To promote high quality and sustainable urban design.	0
13. To protect and enhance the historic environment	-
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+
16. To maximise the benefits of regeneration and development to promote sustainable communities.	0

Commentary

9.3 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 of additional homes and maximise potential economic benefits. 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.	Meanwhile uses	Safety and security	Inclusive growth and delivering social value
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		+	+	+	+	+	++	+

Options Sustainability Objectives	Home s	Econ omy and emp.	Retail and leisur e	Socia l infra.	Mean- while uses	Safet y and secur ity	Inclus ive growt h and delive ring social value
community							
3. To ensure access to local shopping, community and leisure facilities.	0	0	++	++	0	0	+
4. To tackle poverty and social exclusion	+	+	+	+	+	+	++
5. To improve amenity by minimising the impacts associated with development.	0	0	0	0	+	++	+
6. To conserve and improve open space provision and increase access to and enhancement of open space.	0	0	0	0	0	0	0
7. To improve local air quality and limit exposure.	0	0	0	0	0	0	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0	0	0	0	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0	0	0	0	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0	0	0	0	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	0	+	0	0	0	0

Sustainability Objectives Options	Homes	Economy and emp.	Retail and leisure	Social infra.	Meanwhile uses	Safety and security	Inclusive growth and delivering social value
12. To promote high quality and sustainable urban design.	+	+	0	0	0	+	0
13. To protect and enhance the historic environment	0	0	0	+	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	+	+	+	+	++	+	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+	++	++	+	++	+	++
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	++	++	+	++	0	++

Commentary

Homes

9.4 The land use strategy supports the delivery of a significant number of new homes and would therefore have a very positive impact in terms of provision of new homes. It would also deliver wider social benefits through enabling a range of types of homes, including affordable homes, providing new homes with excellent public transport links and good access to local facilities and services. This will aid to the creation of mixed and balanced, sustainable communities.

Economy and employment

9.5 The strategy provides a strong focus on economic growth and would provide strong benefits in terms of tackling poverty and exclusion, promoting equal opportunities and maximising the benefits of regeneration. It promotes the provision of employment uses in a highly sustainable location.

Retail and leisure

9.6 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.

Social infrastructure

- 9.7 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.
- 9.8 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.

Meanwhile uses

- 9.9 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 buildings that would be significantly affected by potential significant noise and disturbance from HS2. The approach would bring about an efficient use of land and making sure that buildings 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.

Safety and Security

- 9.10 This additional section to the Land use Strategy highlights the importance of safety and security for Euston and seeks to ensure that existing and new communities feel safe in streets and spaces so that they are enjoyable to use through design, management and maintenance.

Inclusive growth and delivering Social value

- 9.11 This addition of this to the Land use Strategy seeks to reduce inequalities and increase life chances in local residential communities. It will help to create opportunities for all so that investment delivers benefits where they are most needed.

Main policy alternatives

- 9.12 There are no specific alternatives identified for this Strategic Principle.

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 and leisure facilities.		+
4. To tackle poverty and social exclusion		0
5. To improve amenity by minimising the impacts associated with development.		+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+
7. To improve local air quality and limit exposure.		0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+
12. To promote high quality and sustainable urban design.		++
13. To protect and enhance the historic environment		+
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		+

Sustainability Objectives	Options	Urban Design Strategy
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary

9.13 As with the previous SA for the EAP 2015, urban design plays an important role in ensuring that new development is of high quality and contributes positively to the character and context of the Euston area 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 active travel, 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. The Design Strategy has the addition of ensuring that development is designed in a low carbon way and for sustainable living in the short and long term.

Main policy alternatives

9.14 There are no specific alternatives identified for this Strategic Principle.

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 and leisure facilities.		+
4. To tackle poverty and social exclusion		+
5. To improve amenity by minimising the impacts associated with development.		+-
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+

Sustainability Objectives	Options	Transport Strategy
7. To improve local air quality and limit exposure.		+ -
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		++
12. To promote high quality and sustainable urban design.		+
13. To protect and enhance the historic environment		+
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		+
16. To maximise the benefits of regeneration and development to promote sustainable communities.		++

Commentary

- 9.15 As with the previous EAP, 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.
- 9.16 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, through improved and safer infrastructure, would help to promote healthy lifestyles.

9.17 An emphasis on more sustainable transport modes and measures that reduce the dominance of motor vehicles will help to minimise private motorised transport and maximise use of more efficient energy and low emission modes. The introduction of Euston Road as an Air Quality Focus Area helps the promotion of non-renewable resources to fuel transport, as well as helping to address noise and air quality issues associated with transport. Sustainable freight modes and methods should be prioritised across the station site, in order to minimise the impacts of freight and establish options for consolidating, reducing, remodelling and retiming deliveries. TfL buses now meet ULEZ emissions standards across the whole area. The Transport Strategy could however have potential negative impacts in terms of noise and air pollution resulting from increased transport provision

Main policy alternatives

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

- Option 1a) Retain or re-provide existing bus station, stops and stands
- Option 1b) Re-design the layout of the bus facility
- Option 1c) Relocate bus stops and stands in existing bus station to surrounding, existing road network

SP3.2 Alternative options for taxi provision

- Option 2a) Location of taxi rank on the station site that serves HS2, NR and Lendlease
- Option 2b) Location of taxi rank on station site and a drop off facility on Eversholt Street

SP3.3 Euston Area Walking and Cycling Improvement Options

- Option 3a) Retain levels of cycling and provision on the Euston Station Site and on surrounding street network as they currently are
- Option 3b) Improve walking and cycling provision on the Euston Station site but leave highway network as it currently is.
- Option 3c) Improve walking and cycling provision on the Euston Station site and provide some improvements for pedestrians and cyclists on the surrounding road network
- Option 3d) Improve walking and cycling provision on the Euston Station site and provide significant improvements for pedestrians and cyclists on the surrounding road network

Environment Strategy (Strategic Principle EAP4: Environment)

Sustainability Objectives	Options	Environment Strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0

Sustainability Objectives	Options	Environment Strategy
2. To promote a healthy and safe community		++
3. To ensure access to local shopping, community and leisure facilities.		0
4. To tackle poverty and social exclusion		+-
5. To improve amenity by minimising the impacts associated with development.		+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		0
7. To improve local air quality and limit exposure.		++
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		++
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		++
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		++
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+
12. To promote high quality and sustainable urban design.		0
13. To protect and enhance the historic environment		0
14. To ensure new development makes efficient use of land, buildings and infrastructure.		0
15. To encourage and accommodate sustainable economic growth and employment opportunity.		0
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary

9.19 The proposed use of low carbon and zero emission heating and renewable technologies aim to deliver a net zero carbon development which will make a positive contribution towards the efficient use of infrastructure. 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. Resource and energy efficiency will promote sustainability benefits and could promote some economic benefits in terms of reducing fuel poverty in energy efficient buildings.

Main policy alternatives

9.20 Alternative SP4.1: Decentralised local energy network

Option 1a) Do not remove decentralised local energy network from the Strategic Principle.

Option 1b) Remove decentralised local energy network

Alternative SP4.2:

Option 1a) Do not add resource efficiency and circular economy principles to the Strategic Principle

Option 1b) Include resource efficiency and circular economy principles.

Open Space Strategy (Strategic Principle EAP5: Open Space)

9.21 Due to the importance of Open Space across the Euston area, and the large extent to which the amount of open space has been affected or lost since 2015 due to HS2 construction, it was considered that a separate policy is appropriate.

Sustainability Objectives	Options	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 and leisure facilities.		+
4. To tackle poverty and social exclusion		0
5. To improve amenity by minimising the impacts associated with development.		+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		++

Sustainability Objectives	Options	Open Space Strategy
7. To improve local air quality and limit exposure.		+
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		++
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		++
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+
12. To promote high quality and sustainable urban design.		+
13. To protect and enhance the historic environment		0
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		0
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary

9.22 The addition of a separate Open Space policy allows further guidance to be given in the EAP about how we expect to see open space delivered. 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 and we have been advised that this is unlikely be forthcoming under current spending plans.

Main policy alternatives

9.23 Alternative SP5.1: Open Space provision

Option 1a) Leave existing policy as in EAP 2015

Option 1b) Add in principles for open space

Places

Development Principle EAP1: Euston Station and tracks

Development Principle EAP2: Euston Road

Development Principle EAP3: The Cutting

Sustainability Objectives	Options	Euston Station and tracks	Euston Road	Camden Cutting
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 and leisure facilities.		++	+	+
4. To tackle poverty and social exclusion		+-	+-	+-
5. To improve amenity by minimising the impacts associated with development.		+-	+-	+-
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+	+	+
7. To improve local air quality and limit exposure.		--	--	--
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-	+-
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	0	0

Sustainability Objectives	Options	Euston Station and tracks	Euston Road	Camden Cutting
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+	+	0
12. To promote high quality and sustainable urban design.		+	+	+
13. To protect and enhance the historic environment		+ -	+ -	+
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+	+ -	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		++	+	+
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+	+	+

Commentary

Euston Station and Tracks:

- 9.24 Euston station and tracks would provide a balance of homes and jobs that would deliver strong benefits in terms of housing delivery and economic growth/employment. 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.
- 9.25 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.
- 9.26 A focus on high quality design and public realm would generate significant urban design benefits. The Principle includes reference to substantial inclusive and accessible open space to invite people above the station. This open space would have significant benefits for local communities and visitors. 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.

Alternative policy options

- 9.27 Alternative DP1.1: Seek a higher proportion of housing on the Euston Station and Tracks site.

Euston Road:

- 9.28 Euston Road will be transformed to provide a safer, inclusive street environment to align with the principles from the Euston Healthy Streets project. This will involve the provision of a redesigned bus facility and improved public realm and road crossings to provide a more attractive and vibrant street.

Alternative policy options

- 9.29 Alternative DP2.1: More stringent in relation to reducing traffic as part of enhancing the environment for pedestrians and cyclists

Alternative DP2.2: Do not seek to redress the balance between motorised transport and walking/ cycling along Euston Road

Camden Cutting:

- 9.30 The anticipated extent of decking over the tracks has been reduced since the adoption of the EAP 2015. Engineering constraints and funding issues are expected to limit the extent of decking above network rail tracks. As a consequence decking is no longer anticipated above the tracks in the northern part of the railway cutting or above the tracks on the eastern side. Camden remains committed to decking in these areas and will work with partners to unlock this potential. A reduction in the number of homes will be delivered in comparison to the EAP 2015. The development potential of the railway siding adjacent to Mornington Terrace has been added to the Principle. New jobs will be created and new homes will increase the demand for community facilities. The Principle recommends that EAP design principles for development in the Cutting should be translated into a Design Code.

Alternative policy options

- 9.31 Alternative DP3.1: Seek a higher proportion of housing on the Cutting
Alternative DP3.2: Do not add development plot for housing at the railway siding adjacent to Mornington Terrace

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	Amphill and Mornington Crescent station	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 and leisure facilities.		++	+-	0	++
4. To tackle poverty and social exclusion		+	+-	0	+
5. To improve amenity by minimising the impacts associated with development.		+	+	0	+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+	+-	0	+
7. To improve local air quality and limit exposure.		+	+	0	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		0	+	+	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		0	0	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		0	0	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+	+	+	+

Sustainability Objectives	Options	Drummond Street and Hampstead Road	Regents Park Estate	Amphill and Mornington Crescent station	West Somers Town
12. To promote high quality and sustainable urban design.		+	+	+	+
13. To protect and enhance the historic environment		0	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+	+	+	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		0	+	0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+	+	+	+

Drummond Street:

- 9.32 This principle has been updated to reflect the demolished buildings as a result of HS2 construction and the relocation of Maria Fidelis School. New open space in the area would contribute to significant benefits for local communities. New guidance is added on the redevelopment of the former Maria Fidelis site, including on use, massing, routes and open space. There is additional emphasis added to maximize opportunities to encourage a more sustainable transport along and across Hampstead Road, including cycle lanes and improved pedestrian crossings. Further details are included in the principle about managing the impact of taxis and private hire vehicles (PHVs) to ensure that vehicle movements do not negatively impact on pedestrians or cyclists.

Alternative policy options

- 9.33 DP4.1: Do not create a pedestrian and cyclist priority area around Drummond Street

DP4.2: Redevelop Maria Fidelis school site exclusively for employment use (not housing and open space)

Regents Park Estate:

- 9.34 The proposed principle has been updated to take account for the HS2 construction on and immediately adjacent to the site. There would likely have

significant benefits in terms of providing new and refurbished housing for the existing communities. Over 100 homes have already been reprovided on the estate as part of HS2 mitigation. The Strategy seeks to improve accessibility issues by enhancing connections and improving open space provision. An estate wide open space strategy which is developed in conjunction with redevelopment proposals is recommended to ensure that the impacts on open space are minimised and replacement/enhancement potential is maximised. Additional development on the Estate is likely to have some negative impacts for existing residents who have already suffered from the impacts of HS2 construction. Positive benefits for the Regents Park Estate include references to exploring use of waste heat from nearby station infrastructure.

Alternative policy options

- 9.35 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

Amphill and Mornington Crescent

- 9.36 The Principle has changed since the 2015 EAP to reflect the reduced capacity for potential new housing along the railway cutting. References to the bus stand facilities at Barnby Street have been removed.

Alternative policy options

- 9.37 Alternative DP6.1: Less growth and change on Amphill – reduced further due to substation removal
- Alternative DP6.2: More growth and change on Amphill

West Somers Town

- 9.38 There were significant alternatives considered for West Somers Town within the previous Sustainability Appraisal. Since the adoption of the EAP in 2015, the Maria Fidelis Lower School has now been re-located to Drummond Crescent thus enhancing access to community facilities and supporting regeneration which has given significant positive impacts for the local community. Central Somers Town is a regeneration project led by Camden's Community Improvement Programme that has already delivered a host of new improvements including new housing, a new school, access to jobs and training and new open space.

Alternative policy options

- 9.39 Alternative DP7.1: Do not redevelop Churchway – this is being retained in the EAP and was assessed previously in the SA 2015 with opportunities for renewal and intensification of the Churchway Estate will be explored with residents and the local community.

Cumulative impacts

- 9.40 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.
- 9.41 This SA has assumed that the EAP and the Camden Local Plan (and other Camden Development Plan documents) would be implemented. It has also assumed that the other Supplementary Planning Documents have been implemented in support of the Local Plan policies.
- 9.42 Outside of the Camden Local Plan 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 5

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 with potentially greater benefits from economic growth.
Adverse impact on adjacent services and facilities	Existing and future users of adjacent services and facilities	If the size and structure of the residential population in the Euston area changes (above and beyond the level of growth envisaged in the Camden Local Plan) there is the potential for increased demands on adjacent services which could impact on the quality and availability of these services. The EAP update seeks to ensure that the provision of, or contributions towards, services is provided as part of development. The Mayor, LBC and other

		<p>delivery partners should continue dialogue to ensure that appropriate facilities and services are in place should the demand require them.</p>
<p>Increased pressure on adjacent open spaces</p>	<p>Existing and future users of adjacent open spaces</p>	<p>An increased residential population, together with the loss of open space as a result of HS2 will lead to an increased pressure on adjacent open spaces. 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>
<p>Disruption caused by overall levels of growth and change (development and transport infrastructure)</p>	<p>Local residents and businesses</p>	<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 other development sites nearby outside the EAP area could impact on neighbouring residential communities, including Somers Town.</p> <p>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 sustainable and active travel as 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 <p>and maximising opportunities for local communities to benefit from change through affordable</p>

		housing provision and employment opportunities.
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10. CONCLUSIONS AND MONITORING

Overall assessment

10.1 Overall the Sustainability Appraisal process has demonstrated that the EAP update would deliver positive sustainability impacts in relation to the SA criteria. This would mean positive social, economic and environmental outcomes for the Euston area. The key outcomes are very similar to the SA for the 2015 EAP:

- 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.
- The Plan would have positive social and environmental impacts through a new open separate space chapter which would improve public realm and would enhance access to open spaces for local communities across the area and help to promote health and wellbeing and ensure safety and security for communities.
- New mixed uses and substantial improvements to the station 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.
- The Plan 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.
- The Plan includes a revised Environment policy to address the Climate Emergency to include maximising resource efficiency and promoting energy efficiency to deliver a net zero carbon development.

10.2 The main negative sustainability impacts picked up in the SA process. These are similar to those picked up in the previous SA:

- Potential noise to new dwellings proposed next to railway tracks. This is addressed where appropriate in each section, to ensure appropriate mitigation.
 - Ongoing construction impacts: whilst the assessment indicates that the overall sustainability outcomes of the proposed approach is positive, there is a need for an appropriate package of measures to address impacts on

affected residents in terms of air pollution, noise and vibration who have already had hugely adverse impacts already.

How has SA process influenced the review of the EAP?

10.3 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 update to the 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 updated Plan;
- Informed the decision making process regarding the strategic options for the Euston Area Plan (including the strategic alternatives assessed in Section 8 above and the assessment of main policy alternatives, which is provided in Appendix C).
- 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.

Monitoring the significant effects of the EAP

10.4 Section 5 of the EAP update will enable the significant effects of implementing the EAP to be monitored. 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 – Table showing responses to scoping consultation

Appendix B - Euston Area Plan Strategic Objectives Appraisal (separate document)

Appendix C - Appraisal of main policy alternatives (separate document)

Appendix D - List of criteria and potential indicators relative to each SA objective

Appendix E - Compliance with SEA Directive/Regulations

APPENDIX A: Summary table of consultation responses following Scoping Report Consultation

Euston Sustainability Appraisal Scoping Report 2021 Statutory consultee responses

Consultee	Comment	Action for EAP Sustainability Appraisal
<u>Environment Agency</u>	There are no major environmental constraints on site that would cause us concern.	Noted. No action required
	We are pleased that you have identified a number sustainability issues including air quality, flood risk, energy efficiency, contaminated land and water use and have drafted a number of objectives to help manage these.	Noted. No action required.
	Whilst contaminated land is mentioned as a sustainability issue there is not an objective to manage it. This site includes a railway station which is likely to be highly contaminative and it is also identified in the issues section that numerous sites in the borough have been previously utilised for heavy industry and other polluting uses. Although this area is not within a groundwater Source Protection Zone, the National	Comments noted and it is recommended that land contamination is added into SA Objective 9 “To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk”

	<p>Planning Policy Framework (NPPF) takes a precautionary approach to land contamination. Land contamination should be investigated before the principle of development is determined to see whether it could preclude certain development due to environmental risk or cost of remediation. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development (Paragraph 183 of the NPPF).</p>	<p>and add a sub-criteria d) ensure development removes land contamination risks</p>
	<p>We are unlikely to comment on land contamination at planning stage due to the low risk to controlled waters in this area however, developers should contact your Environmental Health team who may hold records on known/potential land contamination. They should follow the risk management framework provided in 'Model procedures for the management of land contamination (CLR11),' when dealing with land affected by contamination.</p>	<p>Comments passed onto DM planners</p>
<p><u>Historic England</u></p>	<p>The Euston area covered by the Plan is sensitive in terms of both the number and nature of heritage assets that could be affected by development. Furthermore, any tall building proposals may also have the potential to have effects on the historic environment both beyond the immediate and across neighbouring boroughs. As a result, and given the scale of development envisaged in the existing Euston Area Plan, it is important that the scoping exercise enables a framework that will effectively capture and accurately assess any significant effects on the historic environment.</p>	<p>Noted.</p>

	<p>We would agree that the Scoping Report uses an appropriate format, is clearly structured and that Tables 1 and 2 identify all the relevant plans, programmes and policies in relation to the Plan (Questions 1-3), although we would point out that Historic England Advice Note 4: Tall Buildings is in the process of being revised and will be republished shortly.</p>	<p>Noted. The Scoping Report will be updated once the Tall Buildings Advice Note has been republished.</p>
	<p>In relation to Questions 4, 5 and 6 we would suggest that a broader approach to historic environment issues should be taken to ensure the subsequent Sustainability Appraisal is sufficiently robust. While the approach as set out to the historic environment is satisfactory in as much as it encompasses, we consider that without further amendments it may fail to assess the potential effects of development on existing townscape character, views and the setting of a number of highly important heritage assets including a number within the City of Westminster. Given the likely nature of new development within the Plan area it is clearly important that these effects are given appropriate consideration at this early and meaningful stage in the process.</p>	<p>Noted. See below</p>
	<p>In terms of the baseline information in Appendix 4, we note that there is no information relating to townscape character or views within the Landscape & Cultural Heritage topic. Given the potential effects that the nature of development envisaged within the Plan area may have on this element of the historic environment, it is clearly important that they form part of the assessment of the emerging Plan. We further note that the London</p>	<p>Agreed. The Landscape and Cultural Heritage section of Appendix 4 has been updated to include a section on townscape views and the LVMF corridors that cross the Euston area. The following text is inserted on page 7 of Appendix 4:</p> <p>“Parts of the Euston Area lie within the Wider Setting Consultation</p>

	<p>View Management Framework is identified in Table 2 as a relevant mechanism in the environmental protection of the area, and as a result we consider that this should then inform Appendix 4. This will ensure that the important contribution that protected views make to conserving the setting and significance of heritage assets is appropriately taken into account as part of this exercise and achieve a comprehensive baseline.</p>	<p>Areas (background) of View 5A.2 and 6A.1 identified in the March 2012 LVMF. This indicates a height threshold of up to 30 metres high from approximate ground level.”</p>
	<p>In relation to the information on LB Camden’s conservation areas as set out on pages 4 and 5 of Appendix 4, we also consider that it would be helpful to include reference to the LB Camden Characterisation Study. This contains much helpful information, including analysis of existing townscape character across the Plan area and its surroundings within Camden.</p>	<p>Agreed. Reference to the Camden Characterisation Study has been made on page 5 of Appendix 4. The following text has been added: “Further information on these is included in the relevant Conservation Area Statements and Camden’s Characterisation Study.”</p>
	<p>We would not disagree that the sustainability issue in relation to the historic environment set out on page 15 of the Scoping Report is appropriate in as far as it goes. It is however very broad in nature and could go further in considering the likely impacts from development within the Plan area and how these might affect the significance of the historic environment as a whole as well as individual heritage assets.</p>	<p>This is agreed and section revised to add additional specific detail regarding the historic environment and the LVMF. The following text has been added to page 15 of the Scoping Report: “Parts of the Euston Area lie within the Wider Setting Consultation Areas (background) of View 5A.2 and 6A.1 identified in the March 2012 LVMF. This indicates a height threshold of up to 30 metres high from approximate ground level.”</p>

	Without the broader approach to heritage issues set out above and below in relation to our comments on Qs 4 and 6, this approach would fail to assess all potential effects of new development and would represent an incomplete picture.	Noted.
	We consider that objectives 12 and 13 in the Scoping Report are appropriate as far as they go, yet in themselves would not achieve a comprehensive assessment of any likely effects on the historic environment as envisaged by the SA process. We note that urban design and the historic environment have been separated into two distinct objectives, but also that the criteria underpinning these has been amended from the appraisal of the 2015 version of the Plan to remove reference to consideration of strategic views. While objective 13 and its revised criteria in the Scoping Report are logical as far as it goes, the failure to incorporate reference to strategic views means that potentially significant adverse impacts on the historic environment from development in the setting of heritage assets may not be included. This could be addressed by simply including reference to LVMF strategic views within criteria a) of objective 12.	This is agreed and objective 12 a) on page 23 of the Scoping Report has been added to: a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape and the LVMF strategic views. As a result of this change, Appendix 7 has been updated.
<u>Natural England</u>	No comments to make	

APPENDIX D List of criteria and potential indicators relative to each SA objective

Ref.	Draft	SA	Sub-criteria
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	objective	Will the Euston Area Plan.....
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> a) Provide adequate housing completions to meet local needs b) Protect and promote affordable housing development c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home?
2	To promote a healthy and safe community	<ul style="list-style-type: none"> a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive? c) Support health providers and commissioners to fulfil their strategic estates plans? d) Reduce levels of crime and fear of crime in the area?
3	To ensure access to local shopping, community and leisure facilities.	<ul style="list-style-type: none"> a) Encourage mixed use development? b) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?
4	To tackle poverty and social exclusion	<ul style="list-style-type: none"> a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? b) Provide for equality of access for all to buildings and services? c) Encourage development opportunities in those areas in need of economic development and ensure local residents benefit from growth?
5	To improve amenity by minimising the impacts associated with development.	<ul style="list-style-type: none"> a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses?

6	To conserve and improve open space provision and increase access to and enhancement of open space.	<ul style="list-style-type: none"> a) Help to protect, increase/improve open space? b) Help to increase access to and improve overall open space provision, including children's play space? c) Help to make it easier and safer to access local amenities on foot or by bicycle?
7	To improve local air quality and limit exposure	<ul style="list-style-type: none"> a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage the use of alternative modes of transport to the motorised vehicles and prioritise and encourage low emission, sustainable modes of transport (walking and cycling). e) Address the impact of motorised freight on air quality through working with local businesses to reduce, remode and retime their deliveries?
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	<ul style="list-style-type: none"> a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources and circular economy? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction? g) Reducing reliance on motorised vehicles. Where vehicles are still required encouraging the uptake of low-emission vehicles, particularly for taxis, buses and freight. h) Work with local schools to enable more journeys to and from schools in the Euston area to be made by sustainable, low-emission modes?

9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk	<ul style="list-style-type: none"> a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Take into account potential flood risk? d) Remove land contamination risks
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation and increase connectivity through habitat corridors? d) Protect and provide for the protection and planting of more trees in the borough?
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	<ul style="list-style-type: none"> a) Encourage development at locations that enable walking, cycling and/or the use of public transport? b) Encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Encourage access for all to public transport? d) Encourage a decrease in car usage? e) Enhance permeability of the area for access by non-motorised forms of transport? f) Identifying opportunities for increasing car club provision

		g) Increasing the provision of low-traffic neighbourhoods and Healthy School Streets
12	To promote high quality and sustainable urban design.	<p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape and LVMF strategic views?</p> <p>b) Ensure enhancement of the public realm and local distinctiveness?</p> <p>c) Encourage the use of sustainable design and construction methods?</p>
13	To protect and enhance the historic environment	a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?
14	To ensure new development makes efficient use of land, buildings and infrastructure.	<p>a) Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair?</p> <p>b) Ensure efficient use of land through maximising densities where appropriate?</p>
15	To encourage and accommodate sustainable economic growth and employment opportunity.	<p>a) Encourage the retention and growth of existing, locally based industries?</p> <p>b) Accommodate new and expanding businesses?</p> <p>c) Encourage new investment in the local economy and promote development opportunities for employment?</p> <p>d) Focus growth in growth areas and other highly accessible locations?</p>
16	To maximise the benefits of regeneration and development to promote sustainable communities	<p>a) Encourage sustainable inward investment that will promote social wellbeing and benefit the economy?</p> <p>b) Promote access to employment opportunities for local people?</p> <p>c) Protect existing and provide for new education facilities to meet needs, both for existing and new residents?</p>

DRAFT

APPENDIX E Compliance with SEA Directive

SEA requirement (as set out in EU Directive 2001/42/EC)	Where is it covered in the 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"> Appendix 2 of the SA Scoping Report outlines the relationship with other plans, programmes and policies. Table 1 of this SA report lists the plans, programmes and policies reviewed as part of the SA process.
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 4 of the SA Scoping Report outlines the baseline information for the borough. A summary of key issues is presented in table 2 of the SA report. The baseline information is summarised in chapter 6.
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 the key baseline information for the borough. The baseline characteristics of the borough are also contained in chapter 6 of the SA report.
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 (birds directive) and 92/43/EEC (habitats directive)	<ul style="list-style-type: none"> A Habitats Regulation Assessment screening to be carried out which concluded that the draft plan is unlikely to have significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites.
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 are set out in Appendix 2 of the SA Scoping Report, see also chapter 6 of the SA report which briefly outlines how these have been considered in the preparation of the EAP review

<p>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</p>	<ul style="list-style-type: none"> • These are covered in the sustainability objectives against which all of the EAP sites will have been assessed the main Report.
<p>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</p>	<ul style="list-style-type: none"> • Mitigation measures are discussed in the
<p>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</p>	<ul style="list-style-type: none"> • Appendix C of this SA report detail how the options were developed and considered while the gaps and difficulties in obtaining some baseline data was explained in chapter 5 of the SA Scoping Report.
<p>i) A description of measures envisaged concerning monitoring</p>	<ul style="list-style-type: none"> • Proposed monitoring measures are found in Chapter 5 of the EAP update and the Council's AMR
<p>j) a non-technical summary of the information provided under the above headings</p>	<ul style="list-style-type: none"> • A non-technical summary is at the beginning of this SA Report.