

London Borough of Camden

Euston Area Plan Update

Consultation Statement

June 2024

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Introduction

The Euston Area Plan (EAP) was adopted in 2015. It is a long-term planning framework to guide transformational change in the area, focused on the redevelopment of Euston station. It sets strategic policy for new development in the Euston area, illustrating where new open spaces and buildings could be, what their proposed uses could be (homes, shops, employment, community facilities), guidance on important design considerations and enabling sustainable travel in and through the area. It seeks to secure benefits from regeneration for the local community and London as whole.

The policies in the EAP were reviewed in 2020 and a decision was taken to partially update the EAP to take account of changing circumstances affecting the area.

The proposed updates to the EAP were prepared alongside work by HS2 Ltd to progress their station design, work by Network Rail to consider the redevelopment of the existing Euston station and work by Lendlease to develop a masterplan for the area over the station and tracks and in the cuttings.

The EAP Update covers:

- Jobs and homes capacity review taking account of changes to areas enabled for development
- How to ensure good growth with additional focus on health and wellbeing, safety and security and social value
- Definition of tall buildings
- Additional focus on pedestrian and cyclist experience and safety
- Increased focus on low-carbon development, zero emission heating, resource efficiency and circular economy
- Principles for public open space
- Viability and constraints

There was a public consultation on the EAP Update running from 4th January 2023 for 6 weeks. This report summarises the consultation process, the responses received and the Council's proposed response to them.

Soon after this consultation, the Government announced a pause to HS2 works at Euston, while strategic decisions were made about the future of Euston. With the publication of its Network North paper in October 2023, the Government confirmed that HS2 will come to Euston, and we have now restarted work on the Plan.

The Council is planning a further consultation which aims to highlight key Government announcements and the effect that they could have on the updates to the EAP. In reviewing the limited information that is available to us we think that many of the issues remain broadly the same, as do our aspirations for the Euston area, however there are some elements that we understand will change and we have tried to highlight these where possible. The proposed consultation is additional to the 2023 consultation which this report summarises and all responses to that will be considered alongside responses to this supplementary consultation. This statement will be updated to reflect responses received at the appropriate point in time.

Statement of Community Involvement

Camden's Statement of Community Involvement (SCI) sets out how the Council will involve local people when preparing planning policies. In undertaking the consultation on the EAP Update the Council has followed the principles of the SCI. Key principles from the SCI which have been followed in this consultation include:

- Being clear about the aims and scope of the consultation,
- Helping people to be involved by consulting them in a variety of ways,
- Being inclusive so that a good range of views are obtained, and
- Seeking views at the earliest possible stage and throughout the process.

Regulations

The EAP Update will be subject to two stages of consultation. The stages are listed below. The regulations referred to below are from the Town and Country Planning (Local Planning) (England) Regulations 2012.

Stage 1: (Regulation 18) Draft EAP Update

Stage 2: (Regulation 19) Proposed Submission Draft EAP Update and responses pursuant to regulation 20 (undertaken in the lead up to the Examination)

Stage 1 (Regulation 18)

When preparing a Local Plan local planning authorities must undertake initial consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations state that the local planning authority must notify interested parties and individuals, including the prescribed bodies defined in the Regulations, invite comment, and must take into consideration the representations made in response.

The EAP Update is a partial update of the EAP 2015 rather than a new plan, and comments received, and issues identified through the consultation on the draft planning brief have informed the EAP Update. The EAP Update also took account of ongoing consultation with the Residents Advisory Group and business and community groups.

In early 2020 Camden consulted on a Draft Euston Planning Brief which included guidance for development above Euston station as well at the other sub-areas identified in the EAP. Elements of the planning brief have been incorporated into the EAP Update.

In December 2020 a public Call for Sites was carried out consulting via Commonplace on whether there are any additional sites in the Euston area that may have the potential for development (for housing and economic purposes) to include in the Euston Area Plan review. One response was received (for 250 Euston Road).

Consultation activities

The public consultation was open to local residents, businesses, landowners, workers, community groups and all those with an interest in the Euston Area Plan Update. A range of consultation techniques were used to engage the public and interested parties and encourage feedback:

- Emails notifying interested parties of the consultation period and public drop-in events
- Online engagement tool, Commonplace, which included summaries of draft policies, maps of sub-areas and questionnaires for each.
- Details of the consultation were published on the EAP website
- Facebook, Twitter and Next Door app advertisements
- Posters with information about the consultation and public drop-in sessions
- Press advertisement in Camden New Journal
- Site notices throughout the Euston Area
- Public drop-in sessions
- Leaflet handout at Euston Station

Email

We contacted a wide range of interested parties and individuals, comprising:

- contacts on the Council's planning policy database, which is comprised of individuals and organisations who have asked to be contacted about planning policy matters, including those who have previously responded to planning consultations, and consultation bodies in accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012,
- Camden Councillors,
- neighbouring planning authorities (Barnet, Brent, City of London, Haringey, Islington and Westminster),
- prescribed bodies, in accordance with the 'duty to cooperate' (as set out below),
- neighbourhood planning forums and proposed neighbourhood planning forums and their members,
- landowners in the Euston area.

Commonplace

Commonplace is a comprehensive online consultation platform that was utilised during this round of public consultation. The Commonplace website included an umbrella page with an overall map of all sub-areas within the EAP plotted out and tiles linking to each strategy.

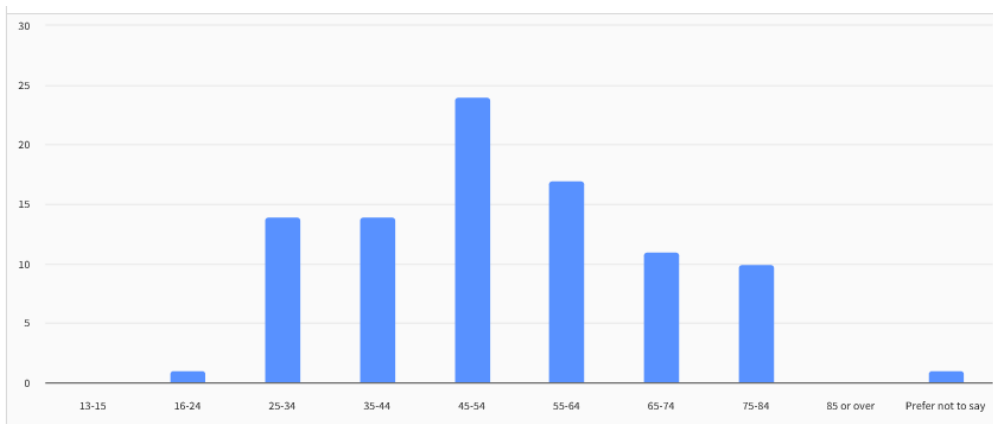
Link: <https://eustonareaplanreview.commonplace.is/>

Commonplace was live from 6 January to the 19 February 2023.

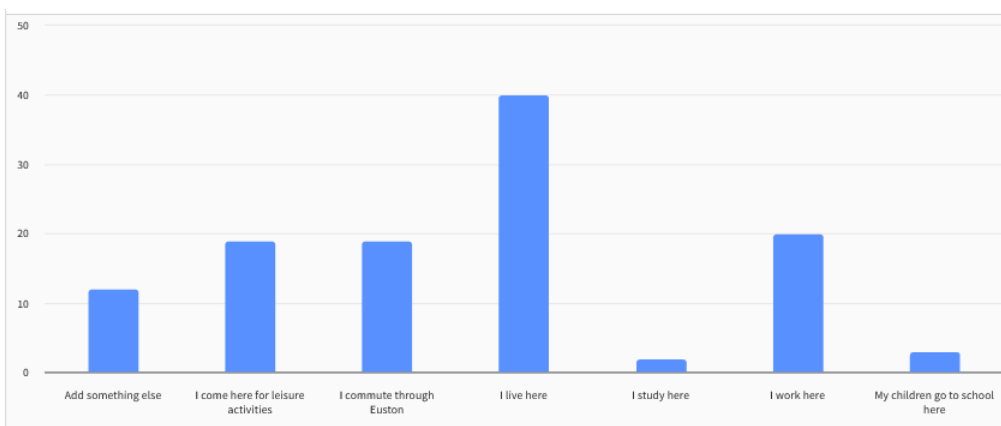
During this period there were 3,784 visitors to the Commonplace website and a total of 147 respondents who made 400 contributions.

Most respondents were aged over 45, lived or worked in the Euston area and 70%¹ either walked or cycled when travelling to or around the Euston area. In terms of ethnicity, of the 48 people who responded to this question 72% were white (35) with 12.5% 'other white' (6) and 8% 'mixed / multiple' (4).

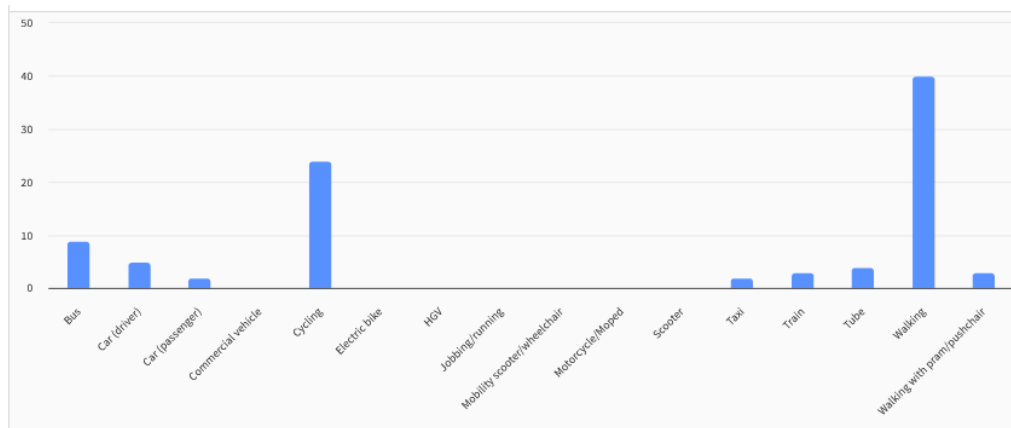
Age group of respondents



Connection to Euston area



¹ Of the 97 people who answered the travel question, 64 people either walked or cycled.

How do you usually travel to or around the Euston area**Euston Area Plan website**

The consultation was publicised on the dedicated Euston Area Plan website.

Link: <https://www.eustonareaplan.info/>

Social Media

We delivered 3 weeks of geotargeted Facebook Adverts to the Regent's Park Estate area, and additional organic Twitter and Nextdoor posts, encouraging engagement and signposting to the EAP microsite as well as publicising the drop-in sessions. The public consultation was publicised within the Nextdoor app, which is a private social network for your neighbourhood.

Twitter

Over the course of the consultation period, we sent two tweets per week promoting the consultation. We used the LB Camden official twitter account @camdentalking which has 14,333 followers.

Facebook

Two methods of communication:

Method 1, geo-targeted notifications to 1km radius of Euston Station. Reaching 12,500 Facebook users with a 7.3% engagement rate click through to microsite.

Method 2, geo-targeted spend to 1km radius of Euston Station in translated (Bengali, Spanish and Somali) adverts. Reaching 12,000 Facebook users with a 3.8% engagement rate click through to microsite.

There were 1360 total clicks through to the microsite from the Facebook adverts. EAP posts massively outperformed average Facebook advert engagement rates of 0.9% and had the second highest engagement rate of any Camden paid advert in December and January (second only to Cost of Living content).

Translated posts also out-performed average Facebook engagement rates, though performed worse than initial method 1 adverts in English. As these were targeted at under-represented groups in the area, this should still be considered a success.

Libraries

Consultation boards highlighting key aspects of the consultation were placed in the Pancras Library at 5 Pancras Square and the library at the Crowndale Centre. Hard copies of the draft plan were also made available.

Posters advertising the consultation drop-in sessions were also displayed within all public libraries.

Newspapers

An advert was published in the Camden New Journal on Thursday 5 January 2023.

Site Notices

A coloured A5 site notice was posted throughout the Euston Area for the duration of the consultation period with information about the consultation and public drop-in events.

Public drop-in events

A number of drop-in events were held where interested stakeholders could attend to view the consultation materials and discuss proposals directly with Council officers. The events were held on the following dates and locations:

- Tuesday 17th January, 8.30am to 11.30am, Surma Community Centre, 1 Robert Street, NW1 3JU
- Thursday 19th January, 1pm to 4pm, The St Pancras and Somers Town Living Centre, 2 Ossulston Street, NW1 1DF
- Tuesday 24th January, 10am to 1pm, Dick Collins Hall, Robert Street, NW1 3FB
- Thursday 26th January, 4pm to 7pm, Ampthill Tenants' Hall, Opposite Stockbeck in Barnby Street, NW1 2RS

Duty to cooperate

To comply with the Localism Act and the NPPF, the Euston Area Plan is being prepared in accordance with the Duty to Co-operate. This means involving specific consultees in preparing the document including neighbouring and nearby local authorities, statutory consultees and infrastructure providers. The full list of Duty to Co-operate bodies included is specified in the Town and Country Planning (Local Planning) (England) Regulations 2012.

The duty to cooperate was introduced in the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

The Council held a series of meetings with planning officers from neighbouring planning authorities (Brent, City of London, Haringey, Islington, and Westminster) and with the Greater London Authority, Transport for London and

the Master Development Partner Lendlease. Meetings were also held with major landowners, including Royal Mail, UCL, Network Rail, and HS2 Ltd.

Summary of responses

1 Our Strategy for development at Euston

The Commonplace website asked for views on the proposed updates to the overall strategy. There were 44 Commonplace responses to this question, of which 11 responses fully agreed or mostly agreed, 15 responses neither agreed or disagreed and 18 responses either mostly disagreed or did not agree at all.

Summary of responses

- Objections to decrease in new homes and increase in new jobs.
- Concerns over overdevelopment and height of new development.
- Request for a limit on new retail space.
- Protect Euston Square Gardens, including the mature trees.
- Support for pedestrianisation of Phoenix Road.
- Greater focus on sport and leisure facilities needed.
- Many of the issues raised by the consultation responses to the 'overall strategy' were also raised in response to other chapters. The concerns raised alongside the relevant chapter (shown in brackets) are as follows: Greater focus on heritage assets needed in Somers Town (West Somers Town); more affordable housing for local residents and limit student housing (Land Use Strategy); more open and green spaces that are truly green (Open Space Strategy); more and safer crossings over Euston Road needed (Transport Strategy); and support for east-west routes across stations (Design Strategy). The Council's responses to these comments are provided in the identified chapter.

Council response

- The land use figures used in the Commonplace summary were incorrect. The range for homes included in the draft EAP update was for between 1,500 and approximately 2,500 additional homes, while in the Commonplace summary the upper end of the range was shown as 2,800 new homes. For jobs, the range included in the draft EAP Update was for between 8,000 and 17,500 additional jobs, whereas the Commonplace summary set out between 8,500 and 14,700 jobs. We have noted the comments received in relation to the decrease in homes and increase in jobs as part of the proposed updates to the EAP and have responded to these points below.
- A number of factors impact the proposed land use mix in the Euston Area and the changes in the number of homes and jobs since the adoption of the current EAP. The increase in job numbers is largely due to an increase in the ratio of workers per square metre of floorspace since the current EAP was adopted, so that more jobs can be accommodated on the same amount of employment floorspace. The projected housing delivery for the Euston area is lower than that identified in the 2015 Euston Area Plan, taking into account a reduction in enabled land (primarily in the Camden

Cutting), additional site constraints, and higher costs and viability issues.

- In developing further options for the station in response to the Government's Network North announcement, we will seek to optimise opportunities for residential development in the context of the constraints, and the viability of development.
- In accordance with London Plan policies GG2 and D3, the EAP Update has applied a design led approach to determine the optimum development capacity of sites. General heights that may be appropriate and potential locations for taller buildings have been tested through modelling, taking account of the London View Management Framework, impact on local views and townscape.
- The Council's Public Open Space guidance highlights that Camden's priority will generally be for green spaces and that the Council will generally not support public open space dominated by hard landscaping unless the need for this can be strongly justified.
- The Euston Road chapter of the EAP Update includes specific guidance on Euston Square Gardens and states 'the gardens and existing mature trees should be retained and improved, and use for construction purposes should be limited, with efforts made to fully reinstate for public use as soon as possible.'
- The amount of retail floorspace set out in the EAP Update as appropriate is 20,000sqm and remains unchanged from the EAP 2015. This has been informed by an updated retail study. To avoid over-supply and undermining of existing centres, the provision of additional retail and leisure floorspace above 20,000 sqm would be subject to a Retail Impact Assessment.
- In relation to the concern that leisure and sport need greater focus, the Land Use Strategy seeks the provision of 20,000sqm of retail and leisure floorspace and seeks the joint preparation of a Retail and Leisure Strategy by Project Partners to consider retail and leisure provision across the whole site and throughout all the development stages. Leisure facilities include the provision for sports and exercise.

2. Land Use Strategy

There were 21 Commonplace responses related to the proposed updates to the Land Use Strategy: 5 responses either fully agreed or mostly agreed, 4 responses were neutral (neither agreed nor disagreed) and 10 responses either mostly disagreed or did not agree at all.

In relation to the 'additional focus on health and wellbeing, safety and security and inclusive growth and social value' in the Land Use Strategy, 11 responses either fully agreed or mostly agreed, 3 responses were neutral and the remaining 5 responses either mostly disagreed or did not agree at all.

There were also 14 email responses with comments on the Land Use Strategy. The email and Commonplace responses are summarised below.

Summary of responses

- Object to decrease in homes and increase in new jobs*.
- Affordable housing should be defined with emphasis on social rent. Prioritise affordable homes for local people and key workers. Calls for local lettings policy.
- Workspace should emphasise affordable workspace and its integration with residential areas. Calls for flexible approach to affordable workspace which considers development viability.
- New retail space is excessive*. Retail floorspace provision should not be at expense of operational transport requirements, for example the provision of a suitably sized bus station.
- Support activation of station edge on western side of Eversholt Street but would like affordable units for community.
- Objection to lack of replacement of St James Gardens.
- Support Knowledge Quarter policy and a mix of education, research, student housing, and appropriate evening activities. Suggests broader definition of Knowledge Quarter uses as future growth areas are uncertain and may have not yet emerged. Request large office floorplate is added to list of types of floorspace to support Knowledge Quarter uses.
- There should be a limit on student housing. Objects to prioritisation of conventional housing over student housing. Evidence required for 75% permanent, self-contained homes target and greater clarity as to what this means.
- Calls for flexible approach on housing product. Request evidence base for commercial space calculations.
- Land use designation of zones over Network Rail trainshed unduly prescriptive and calls for greater flexibility.
- Development above the HS2 tracks adjacent to the north of Hampstead Road bridge is not feasible from a technical perspective. Active frontages indicated on the plan are not all feasible in connection with the HS2 scheme given station requirements and 'back of house' functions. Retail Impact Assessment and Cultural Strategy are not required for HS2 Schedule 17 applications.
- The EAP should set indicative capacities, not targets.

Council Response

- Camden will require developers to deliver affordable housing in line with policy in the Camden Local Plan and the London Plan and to provide the maximum reasonable level of affordable housing on individual sites. Camden Council's preferred tenures are social-affordable rented housing and intermediate rented housing (the

* These comments were also made in response to the preceding section 'Our Strategy for Development at Euston', and the Council's response is provided in that section.

guideline mix is 60% social-affordable rented housing and 40% intermediate housing).

- Local Lettings Policy falls outside of the remit of the EAP and would need to be adopted separately. This proposal will be put forward to the relevant team for consideration.
- The EAP set out that new employment floorspace in the Euston Area should include a significant amount of affordable workspace in line with Camden's affordable workspace strategy. Even in areas identified for predominantly residential use, this does not exclude the potential for a range of mixed uses including employment floorspace and affordable workspace. It is noted that the Draft New Local Plan 2024 states that the Council will seek 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years.
- The EAP supports the provision of affordable retail space and Project Partners are expected to prepare a Retail and Leisure Strategy which would need to address the provision of affordable retail space. In relation to Euston station retail, the EAP Update addresses the need to balance the provision of retail against the needs of transport infrastructure.
- While not subject to planning permission, retail within the HS2 station would count towards the total retail floorspace and would impact on the amount of retail that could be provided elsewhere in the Euston area. Retail outside of the HS2 station that exceed this amount would be subject to a Retail Impact Assessment.
- New open space will be provided as part of HS2's mitigation for the loss of open space, including St James' Gardens, this is set out in HS2's Environmental Statement.
- The definition of Knowledge Quarter uses is deemed to be appropriate and justified. It allows for 'other employment uses' where it is shown that these reflect current and emerging needs of the knowledge economy. The area surrounding King's Cross, including Euston, is unique in terms of its concentration of knowledge economy organisations. Therefore, to continue to support the Knowledge Quarter, the Council will prioritise knowledge economy floorspace over large-scale office developments.
- In relation to calls for a flexible approach to housing products, housing should be delivered in accordance with Camden Council's housing priorities. Camden Council's overall priority is to maximise the provision of housing units as permanent homes to meet local housing needs. The evidence of housing need is set out in the Strategic Housing Market Assessment. Therefore at least 75% of new housing should be provided as permanent self-contained homes. The EAP calls for the majority of housing to be delivered as permanent self-contained homes. Permanent self-contained homes include build to rent housing. The Plan allows for a proportion of student housing to be delivered as part of the overall housing mix. The housing strategy acknowledges that student housing and build to rent units may be appropriate in specific contexts above the station, but the strategy does not preclude the provision of student housing and build to rent in other locations.

- The capacity for commercial space has been calculated to optimise the amount of floorspace that can be delivered within the constraints of the site and in accord with the Council's policy priorities, notably the prioritisation of self-contained housing and also consideration of where it might be possible to deliver self-contained housing. It will be necessary to consider viability outputs as further options are worked up. Details of the capacity work will be published in due course.
- The designation of sites above the network rail trainshed roof, including the Royal Mail site, as 'Mixed-use with housing as priority' reflects the Council's overall land use priority, which is to maximise the provision of housing units as permanent homes to meet local housing needs. The overall approach above and around the train station may be reviewed when more is known about the future design and viability of the station(s) and what land is possible to enable for development.
- It is acknowledged that development above the HS2 tracks immediately to the north of Hampstead Road bridge is not currently technically feasible and Figure 3.2 will be updated.
- As part of any application HS2 Ltd should provide evidence why active frontage cannot be provided in places indicated on the plans in the EAP.
- Concern has been raised about the use of the phrase 'exceed the targets'. The Council will review the text in 'Land Use Strategic Principle EAP 1 A' to confirm alignment with the London Plan and the draft new Local Plan 2024.

3. Design Strategy

There were 28 Commonplace responses. In relation to the proposed updates to the Design Strategy, 6 responses either fully agreed or mostly agreed, 7 responses were neutral (neither agreed nor disagreed) and 13 responses either mostly disagreed or did not agree at all.

In relation to the proposed approach to tall buildings in the Design Strategy, 2 responses either fully agreed or mostly agreed, 7 responses were neutral and 15 responses either mostly disagreed or did not agree at all.

There were also 14 email responses with comments on the Design Strategy. The email and Commonplace responses are summarised below.

Summary of responses

Heritage:

- Request to include Community-led heritage assessment to show the local communities' commitment to heritage conservation and enhancement.
- Support protection of heritage assets and designated viewing corridors.

Building heights:

- Concern regarding height of proposed buildings and general impact of tall buildings. Specific concerns raised about the impact of tall

buildings along Eversholt Street and the proposed 4-7 storey buildings behind Mornington Crescent.

- Suggestion that new development heights should match existing building heights.
- Concern regarding impact of proposed massing and heights on views and heritage sites.
- Concerns over viability of scheme with proposed quantum in EAP update.

LVMF:

- St Paul's Cathedral welcomes references in EAP to compliance with London View Management Framework (LVMF) and preserving significance of built heritage assets. Expressed concerns regarding outlined development heights and potential areas for tall buildings and impact on views and heritage significance. Particular concern with tall buildings in the wider setting consultation area of view 6A.1 and 5A.2 and at the edge of the wider setting consultation area for the view 4A.1. Additional assessment is required and there should be engagement with the Cathedral for the next stages of the plan review.
- Request for clarification that development intruding into Landmark Viewing Corridors and Wider Setting Consultation Areas are not treated the same in LVMF policy and the EAP wording around heights should align with LVMF policy.
- Potential impact on Viewing Corridor 4A.1 from development across EAP area should be discussed and included in EAP.

Routes and permeability

- Concern proposed walkway/ bridge to access Clarkson Row from Cutting could become area for antisocial behaviour.
- Support for improving connectivity objective. Noting that current HS2 station design disrupts east-west links. Request stronger commitment to local community engagement in relation to preparation of Design Codes.
- EAP should reflect emerging HS2 station design in relation to east-west routes open 24-hours a day and greening of all routes.

Open space

- Not enough green space created in Camden Cutting area.
- Spaces around Euston Opportunity Area should be welcoming and inclusive regardless of ownership and new public spaces should accord with Mayor's Public London Charter.
- concerned that replacement green space will be landscaped and not for activities.

Design guidance

- More detail about building architecture and design codes needed.
- Strategy should refer to building-integrated biodiversity measures.
- Too little attention is paid to sustainable building practices.

- The EAP should explain site complexities and importance of establishing common vision and agreed standards to bring together the various development projects.

Council Response

Heritage:

- The Community-led heritage assessment will be included in the list of evidence base documents.

Building heights:

- The EAP Update acknowledges the importance of the Euston location. Euston's potential role as a major economic driver within the Central Activities Zone (CAZ) and its function as a major transport hub make it a suitable location for optimising development opportunities and increasing density, including well-designed taller buildings in specific locations.
- Heights have been tested through a design-led approach and 3d modelling, taking into account the London View Management Framework (LVMF) context and impacts on local views, heritage and townscape. Heights caps are mentioned where these have been refined thoroughly with stakeholders including the GLA.
- The EAP potential heights map is illustrative and development proposals would be further tested in relation to Development Plan policies (including impact on heritage and neighbouring amenities) at pre-application / application stage including a requirement for a detailed view assessment using Accurate Visual Representation to assess the impacts. The cumulative impacts of tall buildings would be assessed through this process. The impact of tall buildings on air quality would also be assessed. Air movement affected by tall buildings should support the effective dispersion of pollutants. Tall Building proposals would also need to address the following issues: fire safety; microclimate; overlooking; architecture; biodiversity and sustainability.
- The impact of massing on the local street network is considered and the EAP Update states that the base of a tall building "*should have a direct relationship with the street. The scale and detail should be of a finer grain responding to context and considering how people will interact with it. The design of tall buildings should take particular consideration of the relationship with its lower neighbouring context*".
- Concerns around potential general building heights are noted and the illustrative masterplan showing potential general building heights will be reviewed.
- The range of employment floorspace is considered to be appropriate representing the capacity capable of being supported in the Euston area – able to meet both wider planning requirements and the Plan policies and objectives (including London Plan policies). It is recognised that with the unusual costs involved in redeveloping the station and above tracks, development viability will be a considerable challenge. In considering proposals, it is recognised that subject to assessment of viability, there may need

to be some flexibility in the way that the policies in the Plan are applied.

LVMF

- The Council will engage with St Paul's Cathedral to discuss their concerns. EAP heights and massing have been tested through 3D modelling and we have engaged with the GLA and discussed compliance with the LVMF. It should be noted that the height map is illustrative and any building which encroaches on the LVMF will be subject to consultation with the GLA.
- The impact on view 4A.1 Primrose Hill is referenced in the Cuttings chapter.
- The Council will review the EAP text which relates to heights and the LVMF to confirm alignment with the London Plan.
- It is acknowledged there will be an impact on some views from Regents Park. It is anticipated that most of the impact is mitigated by the existing tree canopies. The additional views (New View 1 and 2) show that the proposed buildings would not be visible from the lawn. The EAP Update acknowledges that 'there may be impacts on local heritage assets, local views and context which would need to be addressed'.
- The impact from further away in Regent's Park (i.e., sports pitches) is deemed acceptable within the Central London context and the existing impact of other buildings visible from these locations.

Routes and permeability

- In relation to the concern with anti-social behaviour (ASB) resulting from the proposed walkway linking to Clarkson Row, it is noted that connections are usually deemed to improve ASB due to the increased passive surveillance from footfall. Major applications are expected to be accompanied by Crime Impact Assessments to demonstrate that development considers crime and anti-social behaviour.
- Improving connectivity remains a key objective of the EAP Update. The redesign of the HS2 station to deliver an affordable scheme could result in the rationalisation of routes. While the Council's aspiration for enhanced east west and north south routes remains, it may not be possible to deliver these straight away. Where this is the case, the Council will aim to safeguard options to allow for future enhancements.
- The EAP has been prepared with supporting technical information from HS2 on the emerging HS2 station design including the extent of enabled development above the HS2 infrastructure. While taking account of emerging station design, the EAP Update looks at how to make the most of the HS2 and Network Rail station designs, to try to ensure that the station designs, and associated development responds to the EAP and community objectives as much as possible. The EAP Update does not refer in detail to specific design elements of the HS2 station and this approach future-proofs the document allowing for future changes to HS2 design to better meet the Council's aspirations for routes to "maintain a 'street like feel': open to the sky, permeable, inviting, legible and publicly accessible at all times".

Open space

- Strategic Principle EAP5 addresses the issue of public open space provision meeting a variety of needs. It states: “A range of new open spaces will be sought appropriate to the needs of potential users, location and local character, and will include larger public open spaces, civic spaces and public realm, play space and local green spaces.”
- The EAP Update addresses the Mayor’s Public London Charter. Development proposals would need to address measures to ensure that spaces feel and function as public open space irrespective of their ownership. The public realm should be managed in line with the Mayor’s Public London Charter.
- In relation to the concern regarding the amount of green space in the Camden Cutting, ‘Development Principle EAP 3: Camden Cutting’ states that “*Open space should be integral to the infrastructure that makes this new part of city healthy, safe and convivial. Development should include a network of different publicly accessible and inclusive spaces with a range of sizes, forms and functions.*”

Design guidance

- As stipulated by NPPF, community engagement on the Design Code should follow guidance within the National Model Design Code. One of the primary purposes of the Design Code is to ensure high-quality design for the built form and the public realm in the Camden Cutting and Euston Station and Tracks sub-areas. The National Model Design Code states that developments should take account of local vernacular, character, heritage, architecture and materials.
- The complexities of the site and the need for a common vision is picked up in section 1.1 of the EAP Update.
- In relation to sustainable building practices, the Design Strategy sets out key urban design principles including ‘low carbon design’. This issue is dealt with in more depth in ‘Strategic Principle EAP4 Environment’ which states that the whole life cycle of the development should be low carbon with minimisation of unregulated and embodied emissions. The Environment Strategy sets out that new major developments should submit a Whole Life Carbon assessment (including operational and embodied emissions) and seek to minimise lifetime emissions.
- In relation to biodiversity, the London Plan includes Policy G6 ‘Biodiversity and access to nature’ and the Camden Local Plan includes Policy A3 ‘Biodiversity’. The National Planning Policy Framework states that development plan documents (such as the EAP) should avoid unnecessary duplication of policies that apply to a particular area. It is noted that the Design Code could seek the inclusion of building-integrated biodiversity measures.

4. Transport Strategy

There were 29 Commonplace responses. In relation to the proposed updates to the Transport Strategy, 18 responses either fully agreed or mostly agreed, 6

responses were neutral (neither agreed nor disagreed) and 4 responses either mostly disagreed or did not agree at all.

In relation to the additional focus on pedestrian and cyclist experience and safety in the Transport Strategy, 23 responses either fully agreed or mostly agreed and the remaining 5 responses either mostly disagreed or did not agree at all.

There were also 11 email responses with comments on the Transport Strategy. The email and Commonplace responses are summarised below.

Summary of responses

- General support for sustainable and active travel, but there were some comments received which objected to making it harder to drive in the area.
- Support for measures that reduce air pollution.
- Suggested amendments to the text relating to the Freight Delivery and Servicing Plan and cycle routes on Whittlebury Street and east-west routes across the station to clarify that HS2 will not be providing these.
- Suggested amendments to text relating to travel mode targets, types of sustainable freight, visitor cycle parking and type of cycle parking.
- Suggest provision of another underground walking link to Euston Square Station.

Pedestrians

- Support for improvements for pedestrians, including safety improvements and improved walking routes across the Euston Area.
- Better and safer crossings and pedestrian priority across Euston Road needed.
- Support for improved pedestrian facilities and public realm along Eversholt Street.

Accessibility

- Concerns that the EAP does not sufficiently consider the needs of elderly and disabled travellers with too much focus on cycling.
- Greater focus on blind and partially sighted people who will be travelling to new Moorfields hospital.

Cycles

- Protect, enhance, and join up existing cycle routes.
- Bike hire schemes need better management as abandoned bikes are a hazard.
- Support for improved cycling facilities.
- Large-scale cycle parking facilities needed.

Taxis

- there is a need to provide a right turn into the rank from Hampstead Road, to prevent ranking around back of Amphil Estate.
- Opposition to taxi and Private Hire Vehicles ranking on Eversholt Street.

Buses

- Eversholt Street should be kept open for two-way bus routes.
- TfL provided specific comments on the provision of a suitably sized bus station that meets passenger and operational requirements for buses which should be clearly set out.
- In relation to bus facilities and that these should enhance the setting and historical context of Euston Square Gardens, concern that 'enhance' sets an unnecessarily high test.

Council Response

- The EAP Update sets out policy aspirations and the Transport Strategy is updated in line with policies in the Mayor's Transport Strategy and Camden's Transport Strategy, which encourages people to use more sustainable kinds of travel.
- While some measures set out in this document may not be provided by HS2, they may be provided by other Euston Partners. In relation to the combined Freight Delivery and Servicing Plan, the EAP Update states that this should be developed, implemented, and managed by the Euston Partnership.
- The Council will review relevant paragraphs in the Transport Strategy to take account of suggestions for textual changes relating to travel mode targets, examples of types of sustainable freight and visitor cycle parking and cycling parking stands.
- The EAP Update already seeks a new paid underground link between Euston Station and Euston Square London Underground stations and further underground links would not be feasible due to cost.

Pedestrians:

- The Euston Healthy Streets project aims to improve the pedestrian environment on the major roads around Euston.

Accessibility:

- The concern about blind and visually impaired people visiting Moorfields is noted. Any proposed changes to the public highway would be subject to an Equalities Impact Assessment, which would assess the positive and negative impacts of the proposal on the nine protected characteristics identified in the Equality Act 2010. We will also continue to notify and try to engage the Royal National Institute of the Blind with proposed updates to the EAP and any consultations on proposed transport and public realm changes.
- London-wide data and Camden specific data shows that the majority of older people and people with disabilities make their journeys on foot or using buses. Therefore, making it easier and safer to walk and cycle in the Euston area would have benefits for older and mobility impaired people who rely on walking or cycling to make their journey. It would also help to take pressure off buses by

enabling more people to make their journey on foot or by bicycle, which would be of benefit to older or mobility impaired people who rely on buses to make their journey.

- The emergency services are a statutory consultee and would, in line with the Council's standard approach, be consulted ahead of any decisions being taken to make changes to the public highway.

Cycles

- A key principle of the EAP Update is to introduce measures to promote cycling, including new routes that connect with the boroughwide network of cycle lanes.
- Figure 3.5 shows where existing cycle routes could be located, how these link into the wider network of cycle lanes proposed in and around Euston Station and that the Council is seeking to retain and enhance these existing routes.
- Shared mobility services have an important role to play in enabling more people to have access to more sustainable and active modes of travel, such as bicycles. We are working with the providers of these services to manage where their bikes are left and Camden are providing dockless bike bays, which provide a demarcated area on the carriageway for dockless bikes to be left.
- The Euston Area Plan sets out that any new developments in the Euston area should provide cycle parking in accordance with the levels set out in the London Plan. The exact location, quantity, and type of cycle parking to be provided are design features that would be picked up at planning application stage and Council-led Safe and Healthy Streets projects in the area.
- If the new Gordon Street LU tube entrance goes ahead, the Council will seek to ensure that there are some cycle parking facilities in this location. The exact number and type of cycle parking is still to be determined but this could include Sheffield stands or a mobility hub (containing shared mobility services, such as dockless bike and/ or Santander bikes).

Taxis

- Taxis are not a priority mode of travel within the road user hierarchy set out in Camden's Transport Strategy. The feasibility of providing a right-turn into the taxi rank, from Hampstead Road, is something that both TfL and LB Camden will explore and review with HS2 as part of the design development for this junction.
- The concern about private hire vehicles and taxis on Eversholt Street is noted and the revised EAP sets out clearly that a strategy for managing both taxis and private hire vehicles at Euston Station is needed to manage the volume of these modes of travel and to mitigate their impacts on the surrounding road network. The Council will seek to secure this strategy through a legal agreement as part of any applications associated with the Euston Station site and masterplan area.

Buses

- Officers acknowledge the comments raised about retaining two-way access for buses on Eversholt Street. Proposed Healthy Streets improvements for Eversholt Street, including provision of buses, is

being investigated as part of the Euston Healthy Streets project being developed jointly with TfL. Proposals for Eversholt Street are still being developed and would align with the Euston Healthy Streets vision document, which broadly seeks to make it easier and safer for journeys in and around Euston Station to be made by walking, cycling and public transport (including buses). A separate public consultation would be held on any changes to Eversholt Street, providing stakeholders with a further opportunity to comment on any proposed changes to Eversholt Street before a decision is taken.

- The routing of and volume of buses serving the Euston area is outside the scope of the EAP and is being picked up through design discussions with Transport for London (TfL) and other Euston Partners.
- The EAP Update states that bus facilities should 'enhance the setting and historical context of Euston Square Gardens'. Concern has been raised that 'enhance' sets an unnecessarily high test. The EAP 2015 identified the opportunity to improve on the current bus station layout by providing a facility which contributes positively to the public realm, and to the setting of Euston Square Gardens. Given this, the use of the word 'enhance' accords with the aspirations set out by the EAP 2015.
- The operational requirements set out by TfL would need to be considered in future designs and agreements. The EAP is a policy document and, therefore, unlikely to specifically reference in detail all the operational requirements TfL have.

5. Environment Strategy

There were 17 Commonplace responses. In relation to the proposed updates to the Environment Strategy, 9 responses either fully agreed or mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 4 responses either mostly disagreed or did not agree at all.

In relation to the increased focus on low-carbon development, zero emission heating, resource efficiency and circular economy in the Environment Strategy, 11 responses either fully agreed or mostly agreed, 1 response was neutral and the remaining 5 responses either mostly disagreed or did not agree at all.

There were also 8 email responses with comments on the Environment Strategy. The email and Commonplace responses are summarised below.

Summary of responses

- Support for minimisation of water consumption but question irrigation of planted space on roof.
- Support for local energy networks (if positioned away from sensitive areas) and better use of waste heat from trains and underground.
- Air quality on Euston Road needs to be improved.
- Greater ambition is needed on meeting net zero targets.
- More new trees and green walls as the aim should be to have as much foliage as possible.

- Need for places to park for those who cannot use public transport.
- Insufficient focus on biodiversity measures.
- Supports net zero carbon development and circular economy principles and ensuring new buildings are adaptable for future uses.
- Supports objective of minimising operational and whole life carbon emissions
- EAP should acknowledge providing SUDs on decking is challenging.
- Requested clarification on air quality standards.
- Opportunities for use of the station waste heat should be explored.
- Unclear how the cost of carbon will be determined.

Council response

- The Council's supplementary planning document 'Water and Flooding' states that details of the water used for irrigation should be provided with planning applications and "*developers will be expected to re-use rainwater where possible and also consider planting drought resistant or low water consuming plants (dry gardens).*"
- The concern identifying the challenge of providing SUDs on a deck above the station and tracks is noted and the text relating to this requirement will be reviewed.
- The use of waste heat from the stations and other sources is reflected in the text: "*Development above and around the station should seek to utilise waste heat from the station and other sources*". The text relating to 'waste heat' will be amended so that it includes a reference to local heat networks.
- The concern with providing opportunities for trees and the relationship between trees and air pollution is noted. The Local Plan 2017 recognises trees and vegetation's role in filtering pollutants from the air. The EAP Update expects green infrastructure to be central to Euston's development and specifically supports extensive tree planting.
- In relation to concerns with poor air quality on Euston Road, Part D of 'Strategic Principle EAP 4: Environment' states that "*Euston Road is identified as an Air Quality Focus Area and will use sustainable and innovative development which delivers a low or zero emission neighbourhood. Development proposals should address and mitigate air quality issues*".
- A concern has been raised that the Environmental Strategy is not sufficiently detailed or ambitious enough to meet the UK's net zero target. Euston presents a significant opportunity to deliver net zero carbon sustainable development through a balance of minimising energy demand through design and energy efficiency measures, low carbon and zero emission technology, and renewable energy generation. The EAP provides a policy framework for development over a 20+ year plan period. If the policy included more detailed specific requirements, for example setting minimum on-site reductions for CO₂, such targets would quickly become outdated as technology progressed and building regulations became stricter. The promotion of net zero carbon is a demanding target without repeating the more specific targets set out in the London Plan. The

inclusion of more prescriptive and less flexible policies would not reflect the evolving nature of zero carbon building policy and there is a concern that more demanding policies would go beyond the current evidence base as well as national policy.

- The Open Space chapter emphasizes the importance of ecology and biodiversity and includes detailed expectations for biodiversity. Proposals are encouraged to apply the most effective greening measures using semi-natural vegetation, wetland or open water, green roofs and green walls, and flower-rich perennial planting. Proposals at Euston would also need to comply with Local Plan Policy A3 Biodiversity and should follow guidance set out in the supporting SPD CPG Biodiversity.
- In relation to concerns that parking should be provided for those who do not wish to use public transport, development at Euston is expected to be car free. A suitable level of blue badge parking to support the proposed land-use mix will need to be provided. On-site parking would be limited to spaces designated for disabled people. This is in line with the London Plan's strategic aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use London cannot continue to grow sustainably.
- Clarification has been requested on the text which relates to air quality standards. The Air Quality CPG was adopted before the WHO 2021 update and therefore needs to be updated. The standards referred to in the EAP Update relate to the most up to date WHO Air Quality Guidelines and the commitments set out in the Camden Clean Air Strategy 2019-2034 / Clean Air Action Plan 2023-2026.
- In relation to carbon offsetting, it is proposed that opportunities for carbon savings are explored across the wider Euston area as a local offsetting alternative to carbon offset payments which should be equal to the cost of delivering carbon reduction onsite. There is significant potential for energy efficiency improvements and renewable energy systems across the Regents Park Estate as an example.

6. Open Space Strategy

There were 20 Commonplace responses. In relation to the proposed updates to the Open Space Strategy, 9 responses either fully agreed or mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 7 responses either mostly disagreed or did not agree at all.

In relation to the suggested principles for open space, 10 responses either fully agreed or mostly agreed, 4 responses were neutral and the remaining 5 responses either mostly disagreed or did not agree at all.

There were also 11 email responses with comments on the Open Space Strategy. The email and Commonplace responses are summarised below.

Summary of responses

- Support principle of all open space being welcoming and accessible.

- Additional principle that open spaces should receive good amounts of sunlight throughout the day suggested.
- Support the design principles for open space.
- Quantum of replacement open space is insufficient.
- The EAP needs to strengthen approach to how HS2 Ltd propose to mitigate the open space lost to the scheme.
- Open space must be genuinely open to the public, not as de-facto gardens for new-build blocks, and should be genuinely green, not delivered as hard surfaces.
- Accessibility and biodiversity should be key aspects of all new open space.
- Requested publication of Open Space analysis. Stressed that Somers Town has lost a disproportionate amount of green space, mature trees and play areas.
- Call for balance between residents' needs and biodiversity.
- Support for new open space, but concern that placing the open space on the roof will act as a physical and mental barrier to local people.
- Strong support for open space and for lost green space to be replaced in full.
- Clearer distinction needed between different kinds of open space on diagram.
- More details on incorporating biodiversity in development needed.
- Call for swift bricks to be included in development.

- Support for replacement open space and integration of green links with Bloomsbury.
- Text and illustration of HS2 replacement open space needs revising. A minimum quantum of replacement open space is not outlined in the HS2 Act or EMRs.

Council response

- The Council intends to publish the Open Space Study.
- Open space will be expected to be delivered in line with Camden's Local Plan policy which will be supported with private amenity space including balconies and green roof space. New open spaces would be expected to be publicly accessible and to feel and function as public open space irrespective of their ownership or management responsibility and to be managed in line with the Mayor's Public London Charter.
- The Council considers mitigation for the open spaces lost as a result of HS2 as a key strategic priority which is set out clearly in the EAP Update.
- A concern has been raised about the accessibility of new open spaces above the station, the height of which could act as a physical and mental barrier to local people. Open space associated

with the new development is proposed above the station with the aim of helping to create a sense of place and to attract people on to this level. The EAP Update recognises the importance of ensuring that spaces are as accessible as possible and states that development above the station should ensure that a diversity of users are welcome and encouraged to use the place.

- The concern that open space must be genuinely public and not dominated by new build development is noted. The EAP Update addresses this concern in 'Principle for Open Spaces' which states that *"In all locations and contexts, spaces should be designed, delivered and managed to be as welcoming, inclusive, and as accessible as possible and clearly available for use by all members of the public"*.
- In relation to the concern that green spaces should be genuinely green and not dominated by hard surfaces, the EAP Update seeks a range of new open spaces appropriate to the needs of potential users, location and local character, including larger public open spaces, civic spaces and public realm, play space and local green spaces. There is an expectation that civic spaces will be landscaped with greenery and planting to the greatest degree possible. It is noted that the Council's Public Open Space planning guidance includes the following: *"Given the amount of hard surfaces in Camden, our priority will generally be for green spaces. The Council will generally not support public open space dominated by hard landscaping unless the need for this can be strongly justified"*.
- It will be for the detailed design of the development plots to show how they will provide open space and meet the requirements of planning policy. The 'Open Space network illustration' aims to show the network of spaces that should be delivered.
- In relation to biodiversity and bird boxes, the Council's Biodiversity guidance sets out biodiversity enhancement measures that should be considered as part of planning applications, and this includes the provision of bird boxes. Habitat creation would need to respond to the specific site context.
- The re-provision of public open space lost as a result of HS2 is a key priority for the Council and the EAP Update seeks to ensure that it is replaced in accordance with HS2's assurances and Environmental Statement. In relation to the 'Open Space network illustration', the Council will continue to test its assumptions of where open space can be provided with the project partners including HS2.

7. Euston Station and Tracks

There were 11 Commonplace responses. In relation to the proposed updates to the development principles for Euston Station and Tracks, 2 responses mostly agreed, 2 responses were neutral (neither agreed nor disagreed) and 6 responses either mostly disagreed or did not agree at all.

There were also 12 email responses with comments on the Euston Station and Tracks section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses**Illustrative masterplan**

- Should there be a distinction between cycle facilities i.e. stands only and 'hubs' where other services might also be provided.

Buses

- Move bus station [no suggestion provided].
- Change of wording related to bus station is needed to ensure it can operate effectively and efficiently. Suggested amendments to Illustrative Masterplan in relation to current location and space indicated for bus station.

Routes and permeability

- Need for East-West cycle route across the station site to improve East-West connectivity.
- Supportive of comprehensive approach to development at both Euston and HS2, but greater emphasis could be placed on the importance of 'open' at-grade north-south routes (i.e., not through or above a station).
- Polygon Road connection is not feasible so alignment via Barnby Street should be shown on illustrations instead.

Servicing

- Concerns with how servicing would be managed. The EAP should provide text and diagrams in relation to servicing of the stations and development.

Euston Square Gardens

- Euston Square gardens should be gardens, not a substitute piazza.
- Concern that a tall building at the front of the NR station would not positively contribute to Euston Square Gardens.

Housing

- Question the provision of 'genuinely affordable' housing in an expensive area.
- Objections to prioritisation of conventional housing over student housing*.
- Development proposals should assist those with disabilities especially those who are blind or sight impaired.

HS2

- HS2 raised concerns with the illustrative masterplan pointing out that certain elements were not feasible or applicable to HS2. They also:
 - Requested clarifications on text.
 - suggested that key routes should recognise and reflect the routes that are included in the emerging HS2 station design.

* This comment was also made in response to the Land Use Strategy section and the Council's response is provided in that section.

- suggested there is a need for a taxi drop-off facility on Eversholt Street.

Protecting views

- Clarification needed in relation to massing being 'stepped back'.
- The avoidance of harm is an unnecessarily high test.

Taxis

- Request for private hire vehicles (PHVs) to be given the same access as taxis to decrease congestion on Eversholt Street.
- Notes that taxi facilities provided by HS2 should be in accordance with requirements set out in the Hybrid Bill and question if different approach is needed for black cabs and PHV.

Infrastructure

- Greater consideration of how to integrate necessary rail infrastructure – vents, plant – from different operators into a successful public realm needed.

Viability

- Clarity needed on statement relating to viability and application of flexibility in planning policies.
- The EAP Update states that new and replacement housing would be focused in the Euston Station and Tracks and the Camden Cutting sub areas, subject largely to the feasibility of decking opportunities. Our understanding is that the Camden Cutting, which could deliver housing, is not reliant on decking opportunities.

Council response**Illustrative Masterplan**

- In relation to the concern that different types of cycle parking facilities should be defined, the exact type of cycle parking will be established at a later stage through the design and planning approval process.

Buses

- While at present, TFL have identified the southeastern corner of the station campus as the only suitable location for the bus station from an operational perspective, the EAP will continue to promote a facility that considers the importance of placemaking and will support alternative locations if these emerge through the feasibility process, subject to these complying with TFL's operational requirements. The supporting text to Fig 3.5 states the bus facilities need to meet various requirements including that it should enable ease of movement through this part of the Euston station site and it should enhance the setting and historical context of Euston Square Gardens. This includes a desire to improve east-west connectivity in this location.

The text relating to bus station will be reviewed and updated where appropriate noting that operational requirements will need to be considered as part of the design process **Routes and permeability**.

- In relation to placing greater importance on 'open' at-grade north-south routes (i.e., not through or above a station), the EAP recognises that improvements will be made to Eversholt Street and Hampstead Road as part of the Euston Healthy Streets project and Cobourg Street is identified as providing an improved north / south cycle route.
- Improving connectivity remains a key objective of the EAP Update. The Council's aspiration for enhanced east west routes remains, and where it is not feasible to provide these straight away, the Council will aim to safeguard options to allow for future enhancements to connectivity.

Servicing

- The EAP highlights the need for a combined Freight Delivery and Servicing Plans for the station site, including both stations and over site development, to specifically encourage out of peak travel freight deliveries, and freight movement efficiencies. Measures to deliver sustainable freight and servicing should include minimising the need for freight vehicles to serve the station or surrounding development. It is anticipated that any freight and servicing infrastructure would be within the confines of the station.

Euston Square Gardens

- The EAP Update recognises the importance of Euston Square Gardens and specific guidance is provided for its. The EAP Update identifies opportunities for public space at the front of the station which should help to alleviate pressure on the use of Euston Square Gardens.
- The concern with a tall building at the front of the station is noted. Locations for taller buildings were identified in the EAP 2015 and included a potential location at the front of the stations. It should be noted that the development potential for a building up to 55m would be lower than the now demolished One Euston Square.

Housing

- The provision of affordable housing in an 'expensive' area would ensure that Euston remains a mixed and inclusive place. This accords with London Plan policy GG4 which seeks to create a housing market that works better for all Londoners and to create mixed and inclusive communities.
- The Council's guidance 'Access for All' states that: "the Council will expect developers to ensure good quality access and circulation arrangements for all pedestrians, regardless of level of mobility, any sensory impairment, learning difficulties or dementia."
- The draft EAP allows for a proportion of student housing as part of the overall housing mix. However, Camden Council's overall priority is to maximise the provision of housing units as permanent homes to meet local housing needs.

HS2

- The EAP is a strategic document which sets out the objectives for the area, including new routes connecting communities on either side of the station. Designs for the new or redeveloped stations will need to consider how it will help to deliver this objective.

- Comments in relation to the feasibility of specific design elements of the HS2 station will need to be reviewed when more information is made available but for now the objectives are likely to remain as they are. As part of any application HS2 Ltd. should provide evidence demonstrating why active frontage cannot be provided. In addition, there is an Assurance that the Secretary of State will require the Nominated Undertaker to design HS2 Euston Station, so far as is reasonably practicable, having regard to all relevant parts of the Euston Area Plan.

Protecting views

- The reference to stepped back is in relation to a development's main frontage(s). This is a standard urban design principle. Setbacks at upper floors reduce a building's impact at street level by allowing one or more upper storeys to be less visible from the street.
- Carefully siting development to avoid harm is in accordance with London Plan Policy 7.12A.

Taxis

- The EAP Update recognises improvements could be made to taxi and PHVs management at Euston and states that: "A strategy for managing taxis and private hire vehicles and their supporting facilities should be developed, implemented and managed by Euston Partners, to ensure taxis are not being over provided for or over ranking on the public highway". The exact detail of how taxis and private hire vehicles would be managed would need to be addressed by any future station proposals by HS2 and NR. The operation of the taxi rank would be within the scope of matters that will be considered by the Council in a future HS2 schedule 17 planning application.
- The EAP Update recognises that it may be necessary to make some provision for taxi and PHV drop-off of mobility impaired passengers along Eversholt Street. However, overall, the EAP Update seeks to ensure there is no over provision of ranking space across the Euston campus and that ranking facilities are provided on site, not on the public highway.

Infrastructure

- In relation to the integration of railway infrastructure into the public realm, the EAP Update includes the following: "The roof will likely be required to accommodate station plant and glazing. These elements should be well incorporated into the overall masterplan and not have a detrimental impact on the usability or quality of public space on the roof".

Viability

- The statement that "Camden's planning policies apply flexibility in setting out planning requirements, in order to take into account viability and other constraints" remains unchanged from the adopted EAP 2015. Providing a flexible framework helps to ensure that the Council's vision and objectives for the area are delivered.
- Only the plot on the north-eastern side of the railway and adjacent to Hampstead Road (former site of Addison Lee) does not require decking. The other plots are either above HS2 or NR infrastructure

and will require enabling works to provide a deck level with the surrounding streets.

8. Euston Road

There were 9 Commonplace responses. In relation to the proposed updates to the development principles for Euston Road, 5 responses fully agreed or mostly agreed, 1 response was neutral (neither agreed nor disagreed) and 3 responses either mostly disagreed or did not agree at all.

There were also 6 email responses with comments on the Euston Road section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Support for the reinstatement and improvement of Euston Square Gardens and for the principle that the bus station should not negatively impact on the Gardens; suggested change to heritage text so that it recognises the importance of heritage assets including British Library, Nettlefolds and the post office building.
- Bus station should be moved due to its impact on Euston Square Gardens*.
- Links to Euston Square underground must be significantly improved**.
- Secure cycle parking is needed.
- Suggested amendments relating to removal of trees, impact of utility works on replanting of trees, cycle parking on Gordon Street**, and the London Squares Preservation Act.
- Suggest Network Rail should also contribute to improving and introducing road crossings and that noise mitigation can only be delivered through substantial landscaping.
- Support for Healthy Streets approach and land use priorities including knowledge economy uses and active frontages at ground floor level.
- The requirements for delivering a successful bus station need to be set out clearly so that any trade-offs can be fairly considered and assessed. Suggested amendments to the Illustrative masterplan, including location of bus station. Noted that pedestrian and cycle improvements should follow Healthy Streets design principles.

* This comment was also made in response to the Euston Station and Tracks section and the Council's response is provided in that section.

** These comments were also made in response to the Transport Strategy section and the Council's response is provided in that section.

*** These comments were also made in response to the Transport Strategy section and the Council's response is provided in that section.

- Euston Road is an important corridor for freight traffic, so the removal of freight movements could displace such traffic to local roads.

Council response

- The Euston Road chapter of the EAP Update includes specific guidance on Euston Square Gardens and states ‘the gardens and existing mature trees should be retained and improved, and use for construction purposes should be limited, with efforts made to fully reinstate for public use as soon as possible.’
- The heritage text in the context section will be reviewed to ensure this include all relevant heritage assets. The reference to British Library will be updated to clarify this is Grade I listed.
- It is acknowledged that the HS2 Act enables removal of trees and that some have already been removed. In relation to the presence of utilities below the gardens, the EAP Update calls for the full restoration of the Euston Square Gardens, and notwithstanding the presence of utilities, this objective remains paramount.
- In relation to HS2 works and the London Squares Preservation Act 1931, the EAP Update refers to the reinstating of the gardens following the HS2 works. The HS2 Act only disapplies the London Squares Preservation Act 1931 with respect to HS2 works.
- In relation to the concern regarding landscaping and noise mitigation the EAP Update refers to the delivery of a greener environment with tree planting, landscaping and planters to mitigate noise and air quality issues along Euston Road. The approach remains unchanged from the adopted EAP 2015. While planting and planters are not expected to mitigate noise, they are likely to be beneficial for air quality.
- In relation to improving / introducing new road crossings, Development Principle EAP 2C will be amended and a reference to Network Rail added.
- Improvements to Euston cycle parking would be brought forward by Project Partners: HS2, Network Rail and Lendlease.
- In relation to the provision of a bus station and the competing demands for space, Camden will continue to work with TfL to find a solution to bus provision at Euston. As Euston Square Gardens are a protected London square, any such solution must take this into account.
- The EAP Update says opportunities should be sought to reduce and remove freight along Euston Road. The consideration of such opportunities would need to examine any impacts including the displacement of freight traffic onto local roads.

9. Camden Cutting

There were 30 Commonplace responses. In relation to the proposed updates to the development principles for Camden Cutting, 3 responses mostly agreed, 4 responses were neutral (neither agreed nor disagreed) and 22 responses either mostly disagreed or did not agree at all.

There were also 12 email responses with comments on the Camden Cutting section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Support for provision of open space and greening in and along the Cutting, including at Mornington Street bridge and Park Village East.
- Langdale open space should be prioritised for open space, not development.
- Regret for loss of proposed large open space to the North of Mornington Street. Stressed that pocket or linear parks where most of the surface is paved should not count as required green space*.
- Concern over proposed building heights in the Cutting.
 - Concern that development to rear of the Mornington Crescent would impact neighbouring amenity.
 - Objections to five-storeys adjacent to Park Village East with up to 12 storeys adjacent to the railway line, and development along Mornington Terrace. New buildings should not be higher than existing buildings.
 - EAP is vague on heights so open to developers' interpretation. Height on maps should be reduced.
- Development should respect the historic context and character of the area regarding sense of space, building materials, architectural style and viewing channels. More consideration should be given to existing heritage assets on either side of the cutting. Support for retention of existing railway Cutting walls and their incorporation into new development.
- Support the provision of new, affordable workshops.
- Prioritise affordable housing. More detail on proposed private, social and affordable housing mix** and services to support this. New housing should be targeted towards those most in need.
- Given the extended period of the EAP, concern that there is a lack of certainty in the development plan. Concern with the long period of disruption.
- Proposals for Langdale open space should be clarified. Comment about demolition already undertaken, suggested amendments to Camden Cutting Illustrative Masterplan (relating to enabled land and headhouses) and that NR should also be mentioned in Delivery Strategy phasing section.

* This comment was also made in response to the Open Space Strategy section and the Council's response is provided in that section.

** This comment was also made in response to the Land Use section and the Council's response is provided in that section.

- Object to Camden's continued commitment to decking of additional areas in the Cutting, as no more public funding or investment will be made available.

Council response

- The support for open space rather than development on 'Langdale open space' is noted.
- In relation to the request for clarification of the Council's approach to 'Langdale open space', it is noted that since the time of the hybrid bill, part of the Z-plot area has always been identified as having some development potential alongside open space. With HS2 redesigning their station it will be necessary for them to consider how they will provide appropriate open space mitigation and so it will be necessary to consider this plot as part of this larger conversation, including the quality of open space that could be delivered in this location.
- The call for the strengthening of the weak aspiration for public open space to the north of Mornington Street Bridge is noted. However, the EAP Update needs to balance the Council's aspirations for open space to the north of the Cutting with the known funding and engineering constraints. Proposals in the EAP Update need to be deliverable. While the EAP Update recognises that decking in this area falls outside current funding commitments, this may change in the future. It is not possible to rule out private investment or categorically rule out future public funding as political priorities may change over time but at this point, we understand that it is very unlikely that it will be delivered.
- The objection to building heights adjacent to Park Village East is noted. The EAP 2015 set out potential general building heights in the Cuttings and provided indicative heights of 4-10 storeys adjacent to Park Village East. The heights are indicative only and the supporting text states "there may be impacts on local heritage assets, local views and context which would need to be addressed". Accurate Visual Representation would be required to support future development to demonstrate that the proposal does not unacceptably impact local views or heritage assets. It is noted that in the EAP 2015 heights stepped down south to north and also east to west. The EAP Update continues this approach.
- The illustrative masterplan showing potential general building heights will be reviewed and comments related to specific sites will be considered. Proposals will need to submit a detailed assessment demonstrating that the proposal would conserve the significance of heritage assets and have an acceptable impact on neighbouring occupiers' amenity.
- The concern with development on the northern part of Mornington Terrace is noted. Historically, Mornington Terrace would have been a two-sided street with a terrace of properties to the west of the existing Mornington Terrace. In 1906 the railway cutting to Euston was widened and this western terrace was demolished. The reference to 'completed' as a two-sided street relates to the original layout being restored. The EAP Update notes residents' concerns

with potential loss of light and street trees and states: "A detailed design and engagement process which involves working with residents neighbouring the site will be essential in order to establish the scale, massing and detailed appearance to ensure an appropriate response to context and to respond to the concerns highlighted."

- The concern that new development should not be higher than existing buildings is noted. Development Principle EAP 3 states that "development proposals should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and scale".
- In relation to the comment that weight should be given to the sense of space, viewing channels and historic context, it is noted that the anticipated extent of decking over the tracks has been reduced since the adoption of the EAP in 2015.
- The EAP Update text will be amended to clarify that railway cutting walls and parapets should be retained where possible provided this contributes to place making.
- In relation to services to support the additional housing, the EAP Update considers schools and concludes "based on current population trends and existing and potential future capacity in local schools, it is expected the level of growth outlined in this plan can be accommodated in existing facilities to be funded through CIL [Community Infrastructure Levy] contributions". In relation to doctor's surgeries, the expectation is that existing facilities surrounding the Euston area will be expanded. There should be sufficient provision of other community facilities to support new development so that additional demand does not place unacceptable pressure on existing community facilities. Contributions towards the provision of such community facilities will be expected.
- In relation to the 'certainty' of the development plan, delivering development sites in the Cuttings area is less challenging than delivering sites over the station and tracks and this is likely to improve the deliverability of sites in the Cutting in earlier phases. The concern with the long period of disruption is noted and the Council will continue to work with Project Partners to ensure disruption and disturbance is kept to a minimum.
- The context section will be amended to clarify that the demolitions needing in connection with HS2 have already taken place.
- It is acknowledged that development above the HS2 tracks immediately to the north of Hampstead Road bridge is not currently technically feasible and Figure 4.6 Illustrative plan is annotated to clarify that this plot is 'not within current funding plans'. Officers will review whether the site immediately to the south of Granby Terrace should also carry this annotation. Officers acknowledge the constraints of developing above the portal headhouse and will review the deliverability of this site.
- The phasing section will be updated to clarify that some plots will require Network Rail enabling.

10. Drummond Street and Hampstead Road

There were 7 Commonplace responses. In relation to the proposed updates to the development principles for Drummond Street and Hampstead Road, 4 responses fully agreed or mostly agreed, 1 response was neutral (neither agreed nor disagreed) and 2 responses did not agree at all.

There were also 11 email responses with comments on the Drummond Street and Hampstead Road section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Objection to removal of parking along Cobourg Street due to concerns over impact on existing businesses, residents, visitors and services. Pedestrianisation raises concerns about access for those with disabilities and limited mobility.
- Support transformation of Hampstead Road as part of the Euston Healthy Streets project, improving connections to Drummond Street and enhancing building frontages.
- Concern that noise mitigation could not be achieved through planting alone.
- Support for provision of one single consolidated taxi rank for Euston Campus.

Council response

- Any proposed transport changes including potential parking removal would be developed in alignment with the policies in Camden's Transport Strategy. All streets west of the HS2 station will need to be considered holistically for traffic routing, traffic-calming measures, walking and cycling improvements and parking restrictions. Any changes proposed on Drummond Street, Cobourg Street or other streets would be subject to a public consultation and would undergo an Equalities Impact Assessment, which includes assessing the impacts of any proposed changes on people with disabilities.
- In relation to the 'Greening of Hampstead Road', the text will be amended to clarify that tree planting can contribute to the mitigation of air pollution, rather than noise pollution.

11. Regent's Park Estate

There were 14 Commonplace responses. In relation to the proposed updates to the development principles for Regent's Park Estate, 2 responses mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 6 responses either mostly disagreed or did not agree at all.

There were also 5 email responses with comments on the Regent's Park Estate section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Support for improved walking and cycling routes (including to Regents Park); improved access for disabled and visually impaired as well as those with prams.
- Support the provision of green space on Park Village East, Mornington Street bridge, and Langdale open space.
- Support for retention of existing railway cutting walls and their incorporation into new development.
- Concern regarding additional replacement housing on the estate, need to preserve sense of openness and natural environment of the area.
- Concerns regarding loss of Regents Park Children's Centre.
- Support for introduction of Healthy Streets projects to improve air quality.
- Support for more Electrical Vehicle (EV) charging points.
- Support improvement of shopfronts on Robert Street.

Council response

- The Council notes the comments relating to additional housing and the impact it could have on the openness of the Regents Park Estate. Any proposals for new housing would need to be developed through exploration and engagement with the local community.
- Euston Healthy Streets' scope includes Hampstead Road, which will focus on reducing air pollution and noise. The funding Camden has secured from the HS2 Road Safety Fund will be used to improve and enable low- emission forms of travel in the Regent's Park Estate, particularly walking and cycling, which could also contribute to reducing air pollution on the Regent's Park Estate.
- The Draft EAP Update recognises the importance of inclusivity and aims to deliver "a sustainable transport system and streets that are accessible and inclusive for all" (Strategic Principle EAP 3: Transport).
- The EAP review refers to the potential relocation of the Regents Park Children's Centre within the estate. If the existing site was redeveloped, it would be necessary to find a new home for the centre on the estate and existing facilities improved on. This would be permanently secured as part of a legal agreement.
- The support on various points is noted and welcomed.

12. Amptill and Mornington Crescent Station

There were 8 Commonplace responses. In relation to the proposed updates to the development principles for Amptill and Mornington Crescent Station, 2

responses mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 3 responses either mostly disagreed or did not agree at all.

There were also 4 email responses with comments on the Ampthill and Mornington Crescent Station section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Request for fenced area for dog use to reduce impact of dog-fouling on Ampthill.
- Ampthill Estate Square should be accessible to public during the day and secure at night to mitigate antisocial behaviour.
- Traffic to Euston Stations should remain on Hampstead Road and not cut through the Estate.
- Improve pedestrian experience of Hampstead Road, provide more green space, and an integrated design for Harrington, Ampthill and Hampstead Park Road.
- Support for high-quality paving on Ampthill square, Mornington Crescent Station, wider pavements, street benches and shops.
- Suggest text should reflect that homes lost to HS2 have already been identified and demolished.

Council response

- The provision of a fenced off area for dog use does not fall within the scope of the EAP but this concern will be relayed to the relevant team.
- Comments on traffic through the estate are noted. There are currently no proposals for traffic to cut through the Ampthill Estate.
- The draft EAP Update seeks to ensure that Hampstead Road will be transformed to provide a more pleasant and accessible street environment drawing on the design principles from the Euston Healthy Streets project.
- The phasing text will be updated to clarify that housing on Regent's Park Estate has been lost to HS2.

13. West Somers Town

There were 16 Commonplace responses. In relation to the proposed updates to the development principles for West Somers Town, 4 responses fully agreed or mostly agreed, 5 responses were neutral (neither agreed nor disagreed) and 3 responses either mostly disagreed or did not agree at all.

There were also 8 email responses with comments on the West Somers Town section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Request clarification on "Healthy Streets Project" and meaning of "renewal and intensification" and "new open space to support any housing intensification".

- Concern regarding amount of traffic on Eversholt Street and Euston Road.
- Call for green, better public spaces on Eversholt Street and Euston Road and improvement to west side of Eversholt Street.
- Concern that heritage is not mentioned among key points and highlight heritage role of Somers Town People's Museum.
- Concern regarding plans for Seymour House and demolition of Eversholt Street and Edith Neville Cottages.
- Notes historical and architectural importance of Churchway Estate and need to preserve it. Concern boundary of Churchway Estate is unclear, call for commitment to retain and retrofit locally listed buildings.
- Opposition to opening of a walking and cycling route through Lancing Street to Churchway due to antisocial behaviour.
- Suggested walking links to King's Cross needs to be further south as Phoenix Road will be used by minority of people walking between the stations.
- Concern raised that proposed walking and cycling routes do not consider needs of disabled independent car users*.
- Keen to highlight delivery of Somers Town Future Neighbourhood priorities.
- Concern with how packaging could be tackled strategically to reduce littering.
- Concern regarding proposed building heights along Eversholt Street, request building heights closest to street lowered to limit light loss and call for design that reduces street air pollution**.
- Support retention of bus station south of Network Rail station provided its impacts are taken into account, highlight importance of buses for those with mobility needs and the need for buses travelling in both directions along Eversholt Street***.
- Call for better management of station traffic on Eversholt Street, object to taxi ranks on Eversholt Street and suggest drop offs limited to those with mobility issues. Suggest need for taxi strategy, HS2 provided taxi rank should be main taxi facility for Euston campus; Mayor's Transport Strategy prioritises buses over taxis, and this should be reflected in policy and subsequent designs for the site.
- Welcome new emphasis on Eversholt Street, request additional text referencing Eversholt Street heritage assets.

* This comment was also made in response to the Transport Strategy and Environment Strategy section and the Council's response is provided in those sections.

** This comment was also made in response to the Design Strategy section and the Council's response is provided in that section.

*** These comments were also made in response to the Transport Strategy section and the Council's response is provided in that section.

Council response

- Euston Healthy Streets is a joint project being developed and delivered by TfL and Camden, the strategic vision for this project was consulted on and published in 2021. The purpose of this project is to carry out a strategic review of the streets surrounding Euston Station (Eversholt Street, Hampstead Road and Euston Road), in order to enable these streets to respond to regeneration and changing travel demands, in a way that is sustainable and meets Healthy Streets objectives. Camden and TfL are now jointly developing designs to meet the objectives of the Euston Healthy Streets vision and integrate with HS2's works in the area. Any proposed changes would be publicly consulted on, providing further opportunity for comment on these proposals.
- The concern with the amount of traffic on Euston Road and Eversholt Street is noted. The Euston Healthy Streets Vision will help to improve the quality of these streets through greening and safety improvements for cyclists and pedestrians. The EAP Update will help to deliver the Euston Healthy Streets Vision.
- The concern with the western side of Eversholt Street is reflected in the EAP Update which seeks to make Eversholt Street a vibrant route with shops and ground floor active frontages on both sides of the street.
- A concern has been raised about the meaning of “renewal and intensification” in relation to the Churchway Estate. The aim of investigating opportunities for the renewal / intensification of the Churchway Estate remains unchanged from the EAP 2015. The ‘intensification’ of Churchway relates to the possibility of further housing on the estate. The Council will work with residents and the community to test the potential for the renewal/intensification of the estate. Camden has a resident-led approach to estate regeneration and a resident ballot is a pre-condition for funding support from the Mayor of London. There are no specific proposals at this stage and the Council’s policy is to seek to ensure that the repurposing, refurbishment and re-use of existing building/s is prioritised over any demolition. The text which relates to the Churchway estate will be reviewed to ensure it is comprehensive and clear.
- Clarification has been requested in relation to open space being provided to support any housing intensification. New open spaces should be provided as part of new development to ensure that development does not put unacceptable pressure on the Borough’s network of open spaces in line with Local Plan policy.
- The Churchway Estate includes locally listed buildings within or around it, including Wellesley House, Winsham House and Seymour House. The Council seeks to protect non-designated heritage assets (including those on the local list).
- The concern with preserving working class heritage and the role of the Somers Town People’s Museum is noted. The EAP Update does highlight that “the area is adjacent to Edwardian and inter war social housing blocks of historic importance”. The context section will be reviewed to ensure that heritage assets are sufficiently considered.

- Edith Neville Cottages and part of Eversholt Street are in the area safeguarded for Crossrail 2. Although Crossrail 2 is currently unfunded the area remains safeguarded. Should construction go ahead, part or all of these sites could be redeveloped and would be expected to contribute to the aspirations of the EAP Update set out in West Somers Town chapter.
- The concern that proposed walking route needs to be moved further south, as more people use Euston Road than Phoenix Road to walk between Euston and King's Cross Stations, is noted and improvements to both Phoenix Rd and Euston Road will be brought forward as part of the delivery of the EAP.
- The EAP Update recognises the importance of inclusivity and aims to deliver "a sustainable transport system and streets that are accessible and inclusive for all" (Strategic Principle EAP 3: Transport). Car users with restricted mobility will continue to be provided for.
- The Euston Healthy Streets programme and the Greening Phoenix Road project align with and would help to deliver the priorities of the Somers Town Future Neighbourhood 2030 Programme (STFN) and the STFN strategy will inform local interventions in this area.
- The suggestion of reducing littering by addressing packaging across the Euston Estate is noted. Sustainability is a key objective of the EAP and development at Euston is expected to support circular economy principles. Development brought forward by partners would be expected to contribute to this objective. Waste minimisation and waste avoidance is a fundamental part of the circular economy.
- Support noted for buses and concerns with station traffic on Eversholt Street will be addressed in the development of the Euston Healthy Streets programme.
- In relation to taxis, the EAP Update states "It may be necessary to make some provision for the drop-off of mobility impaired passengers along Eversholt Street. Any provision will need to be carefully designed and managed to ensure that it does not negatively impact on pedestrians or cyclists". However, overall, the EAP Update seeks to ensure there is no over provision of ranking space across the Euston campus and that ranking facilities are consolidated and provided on site, not on the public highway.
- The revised EAP sets out clearly that a strategy for managing both taxis and private hire vehicles at Euston Station is needed to manage the volume of these modes of travel and to mitigate their impacts on the surrounding road network.
- In relation to the concern with height on Eversholt Street, the EAP Update states that development on the east and west sides of Eversholt Street should provide a transition from Somers Town to the station environment, reflecting elements of the residential neighbourhood's grain, street rhythm, articulation, materiality and variety.
- Impact details on sunlight and daylight as well as air quality will need to be tested during the pre-application process for all development to ensure proposals are policy compliant. The EAP states: As required under policy Camden Local Plan Policy A1

Managing the impact of development DP26 of the Camden Development Policies, development should not harm the amenity of occupiers and neighbours, including in relation to noise, air quality, sunlight and daylight, overshadowing and outlook, and visual privacy and overlooking.

- Historically Lancing Street connected to Churchway. The route runs through the Churchway estate and so its delivery would be linked to Council discussions with residents on future options for the estate, including concerns related to ASB.
- The residential nature of Somers Town is noted in the context section of this chapter. The overall strategy of the EAP Update is to focus growth and development at Euston Station, Camden Cutting and Regent's Park Estate.
- In relation to buses and the Mayor's Transport Strategy, the EAP Update states that "all transport and public realm measures proposed within the Euston Area will need to be developed in accordance with the wider policy vision and enable delivery of the objectives of the Mayor's Transport Strategy". The Camden's Road User Hierarchy reflects the Mayor's Transport Strategy with buses prioritised over taxis.

14. Delivery and Viability

There were 4 email responses with comments on the Delivery and Viability section of the EAP and these are summarised below.

Summary of responses

- Question approach to viability, including the effective deferral of considering viability until the application stage. View that for the scheme to be viable, development needs to be brought forward significantly in excess of that which is currently provided for in the EAP Update.
- Reference should be made to weight of viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms, it should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG. Greater emphasis could also be given to features of the statutory planning framework and how they can address viability concerns on a site-by-site basis and on the potential for other sources of funding potentially being available.
- The wording relating to flexibility applies an inappropriate emphasis on building heights being considered through the assessment of viability at application stage whereas the London Plan states the viability testing is to assess the maximum level of affordable housing.
- In relation to the determination of planning applications and assessment of viability, there is no need to specifically refer to increased building heights nor to general flexibility towards policy as

doing so would not change the statutory approach to decision-making but could create a false impression that it would.

Council response

- The update to the EAP will be examined by an independent examiner to assess whether it has been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: (a) Positively prepared; (b) Justified; (c) Effective and (d) Consistent with national policy. As part of these tests, it will be necessary to demonstrate the viability of the updated EAP. Given the unique nature of the proposals at Euston and the abnormal costs associated with developing over a railway and tracks, understanding and assessing the viability of such a scheme has proved difficult. A high-level assessment has therefore been completed using the best information available at the time.
- The EAP recognises that development above new and existing station facilities will face challenges that are distinct from more typical at grade sites and these need to be considered as part of the viability assessment. The cost of providing a deck to support development above the HS2 station and tracks has been considered as part of high-level viability testing for this plan. It is acknowledged that some flexibility in applying development plan policy may be required to acknowledge the specific circumstances of individual planning applications, as they are judged on their own merits. Wording in relation to viability will be reviewed.
- The content and proposals in the EAP need to be capable of being delivered by a developer or through government funding. Therefore, the plan proposals have been (and will continue to be) developed to respond to existing national and regional policy, costs, physical constraints (where information is available) and bearing in mind technical requirements of key stakeholders and landowners. Given the Network North announcement and the need to revise the station design, it is difficult to reflect accurate proposals given the lack of maturity, testing of emerging designs and sign-off of proposals.
- The EAP will be updated based on reasonable assumptions, setting out clear objectives and ambitions. It will be important to strike a balance between ambition and the current reality around funding, noting the opportunity that careful design and investment provides to create value. In updating the EAP, phasing will need to be considered and, in some cases, this may include a requirement for not ruling out opportunities for future enhancements. There is a risk that proposals and understanding of costs could change over time and the evidence base could need further updates. If new figures are provided at a later date, it may be necessary to consider these as part of a future assessment. Given the long term and complex nature of the project this is to an extent unavoidable.

Appendices

There were 3 email responses with comments on the EAP Appendices and these are summarised below.

Summary of responses

Delivery Plan

- Clarification requested in relation to bus facilities as while HS2 will bring forward bus facilities associated with a HS2 only scheme, other Project Partners may bring forward alternative proposals.
- West Somers Town should be updated to clarify that HS2 will not be delivering Eversholt Street active frontages.
- Euston Station and Tracks: the development packages set out in this table should be amended; NR should also be a lead for net zero carbon development and open spaces; NR is also a funding source/delivery mechanism for Euston Square Gardens.
- Camden Cutting: there are development plots here whose enabling is not linked to the new railway or station and will need to be 'self-enabling'.
- Ampthill and Mornington Crescent Station: the MDP is not currently delivery lead for Ampthill residential development.
- Development Sites: the Royal Mail site on Eversholt Street is not shown on the map as a development site.
- Glossary: Knowledge Quarter should be clearly defined within the EAP Update and geographically represented.

Council response

- The development packages in the delivery plan for Euston Station and Tracks will be reviewed and updated. The Delivery Plans will be reviewed to ensure that the correct delivery leads are identified. On the specific point around Euston Square Gardens, it should be noted that HS2 Ltd.'s Environmental Minimum Requirements cover the re-provision of Euston Square Gardens. The Environmental Statement accompanying the HS2 Act outlined the re-instatement of Euston Square Gardens following their use as a construction compound.
- The Camden Local Plan defines the Knowledge Quarter as a one-mile radius from King's Cross, which includes all of the EAP area. Wording will be reviewed to see if there is an opportunity to make this clearer.