

London Borough of Camden

**Euston Area Plan Proposed Submission Draft 2026**

## **DUTY TO CO-OPERATE STATEMENT**

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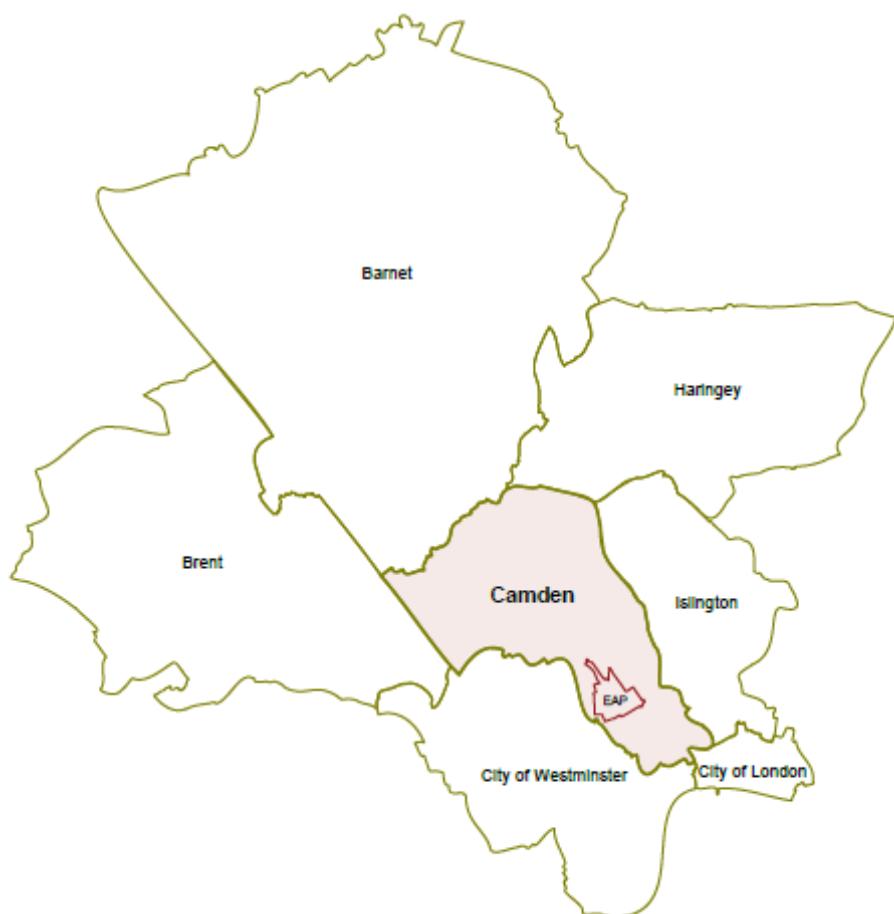
## 1. Introduction and legal context

- 1.1 This duty to co-operate statement outlines how the Euston Area Plan (EAP) Update - Proposed Submission Draft has been prepared in accordance with the statutory duty to co-operate and sets out how the London Borough of Camden has co-operated with other bodies in the preparation of the document. This Statement accompanies the Submission Draft (Regulation 19) version of the EAP Update and supporting documents, which will be submitted to the Secretary of State for examination.
- 1.2 This statement has been written to demonstrate how the Council has fulfilled its duty to co-operate obligations, as set out under Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), and Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has also produced a Statement of Consultation, which sets out how the Council has consulted relevant bodies during the preparation of the Submission Draft of the EAP Update.
- 1.3 Section 110 of the Localism Act 2011 inserted Section 33A and Section 20(5)(c) into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed (being those identified in regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012). The prescribed bodies are:
  - Environment Agency
  - Historic England
  - Natural England
  - Mayor of London (as represented by the Greater London Authority (GLA))
  - Civil Aviation Authority
  - Homes and Communities Agency (now Homes England - the GLA undertakes this function in London)
  - each integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006
  - NHS England
  - Office of Rail Regulation
  - Transport for London
  - Each highway authority (in Camden this is the Council and Transport for London)
  - Marine Management Organisation.
- 1.4 The duty to co-operate requires local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plans in so far as they relate to a strategic matter (that is, a matter that has or would have a significant impact on at least two planning areas). Local Planning Authorities must demonstrate how they have complied with the duty to co-operate at the examination of their Plan.

1.5 The National Planning Policy Framework (NPPF) December 2024 states that strategic policy-making authorities should collaborate to identify the relevant strategic matters they need to address in their plans. They should also engage with their local communities and other relevant bodies including elected Mayors.

## 2. Euston context

2.1 Euston is located in the south of Camden, a diverse inner London Borough with a population of approximately 215,000. It is identified as an Opportunity Area (OA) in the London Plan with potential for large scale development, providing substantial new jobs and homes. Camden lies with inner London and borders six other boroughs - Westminster City Council, the City of London, and the London Boroughs of Barnet, Brent, Haringey and Islington. The Euston area plan boundary is close to the boarder with Westminster and is relatively close to the boundaries with the City of London and Islington, it is a considerable distance from the boundaries with Barnet, Brent and Haringey. See Map 1 below.



**Map 1 – EAP Boundary and neighbouring local authorities**

2.2 The proposed submission draft of the EAP Update is the culmination of a number of processes, activities and levels of engagement and co-operation. It reflects the views expressed and comments made during its preparation by a number of organisations.

2.3 The EAP contains a series of area-wide strategic principles and place-based development principles which will help manage the use of land and the design and layout of buildings, places and spaces in the Euston Area. These build on the existing policies in the London Plan, Camden Local Plan, Camden Site Allocations 2013 and Camden New draft Local Plan and set out objectives to meet local needs and wider area requirements in accordance with the higher level policies. Where the plan does provide policy coverage on more strategic issues, the provisions still remain predominantly local in effect, and include:

- Highlighting the need for connectivity across the Euston Station site and the wider area
- Seeking to ensure that investment delivers benefits where they are most needed, maximising social value and ensuring that all aspects of development promote health and wellbeing and address concerns around safety and security.
- Recognising the role that Euston can play in strengthening the Knowledge Quarter
- Seeking the provision of new open spaces as well as improvements to existing open spaces to mitigate for the loss as a result of HS2 and to meet the needs of the new development
- Supporting the provision of additional transport infrastructure to support the proposed High Speed Two line, including Crossrail Two, which is being progressed separately by Transport for London
- Supporting development and open spaces above the station approach and tracks to the north of Euston Station
- Guiding the distribution of retail, employment and other uses within the plan area; and
- Setting design principles for the plan area and for Character Areas within it, including locations suitable for tall buildings.

2.4 London has its own spatial development strategy, the London Plan, which forms part of the development plan for Camden and all London boroughs. The current London Plan was adopted in March 2021. Planning for strategic matters, and co-operation within London, generally takes place at the London-wide level to inform the London Plan and is co-ordinated by the Greater London Authority (GLA). Camden's Local Plan, and all other borough local plans, including the EAP, must be in general conformity with the London Plan.

2.5 The London Plan sets out a London-wide planning approach to strategic issues such as housing and affordable housing, areas of growth and the Central Activities Zone, economic development, climate change, and infrastructure and transport. The Camden Local Plan helps to deliver the

strategic objectives of the London Plan, interpreting and building upon the objectives that relate to Camden. The EAP in turn helps to deliver the objectives of the Local Plan and London Plan that relate to Euston area.

2.6 There are two designated neighbourhood forums in the Euston area; the Somers Town Neighbourhood Forum and the Drummond Street Neighbourhood Forum. Both forums have been consulted at all stages during the preparation of the EAP, providing responses which the Council has considered as part of the Update to the EAP. Particular issues of concern include the impact of tall buildings and the provision of open space, which policies in the plan seek to address.

***Draft Updates to the EAP***

2.7 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 also informed the EAP Update. It has also taken account of consultation with the Residents Advisory Group and business and community groups and work with the delivery partners at Euston.

2.8 In early 2020 Camden consulted on a Draft Euston Planning Brief which included guidance for development above Euston station as well as the other sub-areas identified in the EAP. Elements of the planning brief have been incorporated into the EAP Update as have the responses to the consultation. In December 2020 a public 'Call for Sites' was carried out and consultation on a draft EAP Update took place in January 2023, followed by a supplementary consultation in the Summer of 2024. Further detail is provided in the Consultation summary.

2.9 Throughout the preparation of the Proposed Submission Draft of the EAP, the Council have taken, and will continue to take, a collaborative approach to plan-making that considers a range of issues. This statement sets out how the relevant 'duty to co-operate' bodies have been involved in the evolution of the plan, and how this involvement has helped shape the proposals as they emerged. Camden Council consider that this statement demonstrates that the duty to co-operate requirements (as set out in the Localism Act 2011 and described in the National Planning Policy Framework) have been fulfilled and that the EAP team has effectively co-operated with other bodies throughout the preparation of the plan.

### **3. Relevant "Duty to Co-operate" bodies**

3.1 The summary below sets out how the Euston Area Plan team has engaged with the statutory bodies and, where relevant, how this has influenced the policy approach advocated in the Area Action Plan.

#### **Statements of Common Ground**

- 3.2 In order to demonstrate effective and on-going joint working, the NPPF expects authorities to prepare and maintain statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.
- 3.3 A statement of common ground is a record of progress in planning for strategic cross-boundary matters. It documents where effective co-operation is, or is not, happening and is a way of demonstrating at examination that plans are based on effective joint working across local authority boundaries. It also forms part of the evidence to demonstrate councils have complied with the duty to cooperate. The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed.
- 3.4 The statement of Common Ground prepared for Camden's Local Plan sets out the main strategic issues that the authorities have collaborated on and these are:
  - Housing need
  - Meeting the need of Gypsies and Travellers
  - Tall buildings
- 3.5 It is noted that because the EAP covers a part of the borough it does not contain a housing requirement, instead it seeks to deliver the housing targets which are set out in the Camden Local Plan.
- 3.6 For the EAP Update, Camden Council have prepared Statements of Common Ground with neighbouring planning authorities which are close to the EAP boundary and where tall buildings may be visible from; London Borough of Islington; City of London Corporation and Westminster City Council concentrating on tall buildings.
- 3.7 The EAP identifies a number of potential sites for tall buildings and Camden has shared modelling it has undertaken to inform capacity studies with neighbouring planning authorities. Following feedback on the potential impact on the heights tested on the setting of designated heritage assets within the City of Westminster in particular, including within the Regents Park, and on the LVMF views, capacity options were developed to explore how impacts could be limited and generally it is considered that the heights shown at figure 3.4 in the EAP would allow for development that does not encroach into the protected vistas identified in the LVMF.
- 3.8 Policies in the EAP seek to encourage high quality design and it highlights that the acceptability of particular tall building proposals, and their location within sites, will be assessed against relevant Development Plan policies, and will be considered against relevant criteria, including consideration of the relationship between any proposed tall building and neighbouring boroughs, and any impact on the historic environment. Changes were made to policy wording in response to comments made by Westminster City Council.

3.9 Meetings were also held (or offered) at a various key stages of the Plan production with the other neighbouring Boroughs of Haringey, Barnet and Brent where Camden updated colleagues on the EAP's production. They were also invited to comments at all key stages of the EAP preperation.

### **Health bodies**

3.10 Officers from the Council's Planning, Property and Social Care services attend the regular meetings of the Camden Local Estates Forum. Members of the Forum also include the NHS North Central London Integrated Care Board (ICB), NHS England, NHS Hospital Trusts, the London Health Urban Development Unit (HUDU), and local GP practices. The meetings provide a forum for discussion and co-ordination on the provision of health facilities in the borough and related planning and estates matters.

3.11 The NHS Healthy Urban Development Unit (HUDU) responded to the Supplementary consultation on the EAP Update noting the significant population uplift likely to result from the housing development proposed in the EAP update and the potential additional capacity that may be needed to account for the growth. They noted that as detailed proposals come forward they will be in a better position to comment on the scale and form of health infrastructure required to support the new population.

3.12 Developer contributions will be sought on major housing developments in the Euston Area to help to fund the demand on health infrastructure as a result of population growth and conversations will continue as greater detail about proposals come forward, noting that the proposed submission draft includes lower housing numbers than included in previous consultations recognising the reduction in enabled land. Conversely, the Council are also developing a social and community infrastructure study to look at what provision would be needed if housing figures in excess of the EAP are progressed as a result of the work of the Euston Housing Delivery Group and will continue to engage with NHS bodies on this work as it progresses.

### **Environment Agency**

3.13 The Environment Agency is the government's advisor on environmental protection and improvement, including on matters relating to water, flood risk, waste and climate change. These issues are mainly covered by the Camden Local Plan.

3.14 The Environment Agency has been invited to make comments at each stage of EAP update production, while no comments have been received on the contents of the EAP update itself, the Environment Agency has provided active input into the sustainability appraisal process, commenting on the scoping report, with updates made to the assessment framework informing the production of the Sustainable Appraisal of the EAP update.

### **Historic England**

- 3.15 Historic England are the government's adviser on the historic environment. They were consulted at all stages in the preparation of the EAP update and responded at each stage. As work has progressed on the EAP update, including on the assessment of the potential capacity of sites, the Council has met with Historic England to discuss potential impacts, including on Strategic and local views.
- 3.16 In their consultation response to the 2023 draft EAP update, Historic England noted that there was much to be welcomed in the consultation draft in its treatment of the historic environment. They also noted that some of the proposals for tall buildings could intrude on the setting of Regents Park and listed heritage assets.
- 3.17 In developing options for determining potential capacity, the Council have met with Historic England and shared emerging information. The Council has considered the comments provided and developed options which lessen the impact on heritage assets, including impacts on Regent's Park. The proposed submission draft of the EAP Update has sought to balance the comments provided, the challenge to optimise housing delivery and the challenge to deliver a viable scheme within the existing constraints. Policy wording seeks to manage impacts on heritage assets and notes the further design and modelling is needed to determine the acceptability of specific proposals on sites, noting the need to consider the impact on heritage assets.
- 3.18 The Council also consulted Historic England on the EAP Update Sustainability Appraisal Scoping Report. The comments received informed the production of the Sustainable Appraisal of the EAP update.

### **Natural England**

- 3.19 Natural England was consulted on the production of the Sustainability Appraisal Scoping Report, and all stages on the EAP Update, they responded to say that they had no comments.

### **Mayor of London / Greater London Authority**

- 3.20 The Mayor of London / Greater London Authority prepare the London Plan, the statutory spatial development strategy for Greater London. Borough plans must be in 'general conformity' with the London Plan. The Council co-operates with the GLA, and other London boroughs, on the preparation of the London Plan and the evidence base that supports it.
- 3.21 Camden meet regularly and work closely with the GLA on matters relating to Euston. The GLA are aware of the challenges faced and in particular the reduction in land available for housing development. They have assisted in modelling the impact of the Euston development by providing a 'jelly mould' digital model, showing the massing envelope for all combined strategic LVMF views (development that exceeds the height of the jelly mould would be visible in strategic views). The jelly mould has been used to inform the LVMF

constraints on tested heights and massing in the Euston stations and tracks area.

3.23 Modelling shows that tall buildings would appear in the wider panoramas, and would require further consultation in terms of their detailed design and material, and their setting in relation to other landmarks within the panorama. The acceptability of particular tall building proposals, and their location within the sites, will be assessed against relevant Development Plan policies including the London Plan's Tall Building policy. Any building which encroaches on the LVMF will be subject to consultation with the GLA.

3.24 The GLA responded to the consultation on the draft update to the EAP published for consultation in 2023 and have been invited to comment at all stages of the EAP Update's preparation. The GLA provided comments both through the formal consultation process and from ongoing dialogue on a number of other policies, including support for strengthening of the knowledge quarter and Euston's role in the central activities zone. The GLA are part of the strategic Governance at Euston, attending officer and governance panels and boards.

#### **Transport for London**

3.25 Transport for London (TfL) is the integrated transport authority for London. It is responsible for implementing the Mayor's Transport Strategy, the capital's public transport network and its strategic road network. Camden works closely with TfL on land use planning and transport planning matters generally. This includes regular liaison meetings between Council planning officers and the TfL Borough Planning Team to discuss planning policy, major planning applications and highways and public realm enhancement projects. Regular meetings were held to inform the EAP update, including the development of a Transport Study for Euston.

3.26 TfL with the support of Camden prepared the Transport Study for Euston, which sets out in more detail the transport context for the Euston Area and the ways in which the Euston Area Plan would help to address this context and support growth and development in the area. The London Plan and Draft (at time of writing) Camden Local Plan take a strategic approach to transport that requires new development to contribute towards fulfilling the objectives of the Mayor's Transport Strategy. The policies in the EAP update seek to deliver Euston specific policies in line with the strategy.

3.27 The Council has met regularly with TfL both demonstrating active and ongoing cooperation throughout the preparation of the document at project team level and at specific multi agency governance boards.

#### **Euston Delivery Organisations**

3.28 Network Rail, HS2, Lendlease and the DfT will all play an important role in the redevelopment of the Euston Station site, and therefore the regeneration of the wider area. The organisations have been consulted at all stages of the

EAP Update preparation and engagement has continued between formal consultation stages.

- 3.29 Work is ongoing to improve integration at Euston between the construction of the HS2 central London terminus and improved onward connections, Network Rail's redevelopment of the mainline station; the redevelopment of the London Underground station and the wider development of the urban environment managed by the Master Development Partner, Lendlease. While governance is currently under review, there has been attendance by all delivery organisations along with Camden, TfL and GLA at a governance boards where the EAP update has been discussed at key moments in the update process.
- 3.30 The attendance of Network Rail, High Speed Two Ltd, TfL and the Department for Transport at various governance and officer boards has also allowed regular input from strategic transport providers.
- 3.31 Camden have also met with the delivery organisations to understand constraints and opportunities (including where land may be enabled) to feed into the EAP update, including on the viability study in line with Governance guidance. Responses from the landowners have sought to maximise development opportunity.
- 3.32 At the time of writing, there are no confirmed Euston station designs or costs. There is a commitment to joint working by the delivery organisations to try to achieve the best solution for Euston, meaning that there is less certainty around station designs, costs and timescales, the plan and update has been developed to be flexible reflecting the uncertainty around the station designs and the capacity to enable development over station infrastructure including in the Cutting.
- 3.33 In addition to the delivery organisations mentioned above, the Council has also been working closely with the Ministry for Housing, Communities and Local Government (MHCLG) and the Euston Housing Delivery Group (EHDG) to look at further opportunities for housing delivery in the Euston Area. Whilst this work is at an early stage, the plan recognises there could be potential for more housing delivered in the area, and MHCLG have been consulted at key stages in the development of the EAP since the establishment of the EHDG.

### **Other London-wide and sub-regional bodies**

- 3.34 Camden is a member of various sub-regional partnerships and working groups, which address strategic planning matters. These include:
  - Central London Forward (CLF), a sub-regional partnership of central London boroughs and facilitating discussions and co-operation on planning, transport and regeneration / economic development issues.
  - the Association of London Borough Planning Officers (ALBPO) Development Plans Committee and the London Boroughs Infrastructure Network, to which all London boroughs are invited. These are London-wide forums for the discussion of strategic issues

and include updates from authorities on policy work and relevant issues.

- The North London Waste Plan was jointly produced with the London Boroughs of Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest. The Plan was adopted by Camden and the other six boroughs in 2022 and forms part of each council's statutory development plan. The Plan identifies suitable sites for the management of north London's waste and policies for determining planning applications for waste facilities.
- the London North Central Flood Risk Partnership, which is a collaboration involving several boroughs and other key stakeholders to address flood risk in the area. The partnership aims to manage flood risk in a strategic and co-ordinated manner. The Council is also working with London Councils and other interested boroughs on the development of a London Surface Water Strategy.
- Joint working with 18 London boroughs and a consultant team on a technical evidence base to inform policy options on energy policies and the Council works closely with other London boroughs on the London Councils Low Carbon workstream.
- the London Borough Neighbourhood Planning Group (organised and chaired by Camden). All boroughs are invited to meetings of the Group.
- Further detail can be found in the Duty to co-operate statement for the Local Plan examination.

## 4. Conclusion

- 4.1 It is considered that EAP has been subject to effective co-operation through constructive, active and ongoing engagement with relevant authorities and bodies that have an interest in the plan. A collaborative approach has been taken, working closely with the GLA and TfL, the delivery bodies and Euston and relevant Government departments. The Euston team has considered the views on strategic matters expressed by relevant bodies during engagement and co-operation activities and those have informed the Plan as appropriate. The Euston team has not received any objections to the Euston Area Plan concerning the duty to co-operate (to date), and the Council's view is that the duty to co-operate is being fulfilled.
- 4.2 A great deal of co-operation and engagement has also been undertaken as part of the preparation of other plans and strategies, all of which has influenced and formed a basis for the Euston Area Plan.
- 4.3 This Statement, the Local Plan Consultation Statement, and Statements of Common Ground, will be updated post regulation 19 consultation and will be used at the public examination of the EAP Update to demonstrate that it has been based on effective cross-boundary joint working.