

EUSTON AREA PLAN PROPOSED SUBMISSION DRAFT 2025

Sustainability Appraisal Report 2025

Non-Technical Summary

Sustainability Appraisal of the Euston Area Plan Update Submission Draft

Non-technical summary 2025

The Euston Area Plan (EAP) Update Proposed Submission Draft will set out the Council's vision for future development in Euston until 2051 and includes the planning policies and site allocations to help achieve this. Site allocations have been included in the EAP Update in order to make the most efficient use of land and buildings available in accordance with established policy. There are 13 sites suggested in the EAP Update to be allocated. The majority of the allocated sites are allocated for housing. 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 and which includes self-contained housing as the priority land-use

The Sustainability Appraisal (SA) is a requirement for Local Plan or Area Action Plan preparation. The SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising the positives. The London Borough Camden has prepared a Sustainability Appraisal (SA) of the Camden Euston Area Plan Proposed Submission Draft. This is the Non-Technical Summary (NTS) of the SA Report.

Method

The SA process began in 2021 with a 'Scoping' process. This considered information about current and emerging social, economic and environmental conditions and significant sustainability issues in the Euston area that the EAP Update could try to address. This information was then used to develop a set of environmental and sustainability objectives (known as the SA framework) against which the likely effects of the updated Euston Area Plan, including reasonable alternatives, could be assessed.

The topics that make up the SA framework are classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Appendix 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows :

Environmental

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

Social

- Population (*population*)
- Health and community (*human health*)
- Deprivation and social exclusion (*population*)

- Education (*population*)
- Housing (*material assets, population*)
- Leisure (*human health*)

Economic

- Town centres and Employment

The SA identifies the effects that different aspects of the Euston Area Plan Update are expected to have on these topics. The effects can be positive or negative with uncertain effects also identified. A matrix was developed that included the sustainability objectives and columns for carrying out the appraisal of the various EAP Strategic Objectives and policies. Within the matrix, the effects are depicted by symbols (see table.1 below), and a commentary is provided to state the reasoning behind the appraisal and to identify any relevant mitigation measures that may be available. This matrix is consistent with the approach used in the SA of the EAP 2015.

Key attributing effects to each objective	
++	Likely large positive impact
+-	Likely positive and negative impacts
0	Uncertain impact or no relationship
-	Likely negative impact
--	Likely large negative impact

As part of the SA there is a legal requirement to examine reasonable alternatives (or options) taking into account the objectives and geographical scope of the Plan. Given this, this SA focuses on reasonable alternatives in the form of alternative approaches to the supply of land, including by allocating sites, in order to provide for development needs and support the achievement of wider plan objectives.

When considering reasonable alternatives, it is important to note that Euston Area Plan Update 2025 seeks to update the EAP 2015. Although many of the policies in the current EAP are still relevant, it was considered beneficial to update the Plan to ensure that future development in the Euston Area most effectively meets Council priorities and secures benefits for the borough and its residents, responding to changed circumstances, in particular:

- the publication of We Make Camden, the Council's Corporate Strategy;
- the Council's declaration of a climate and ecological emergency;
- changes to national planning policy, including the revised permitted development rights and changes to use classes;
- the London Plan 2021;
- changes to station design
- economic and social changes (such as changes in working patterns and shopping habits).

Developing options for a plan is a continual process. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In relation to the SA Report, Regulation 12 (2) of the SEA Regulations requires that: "*The report must identify, describe and evaluate the likely significant effects on the environment of - (a) implementing the plan or programme; and (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.*" The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to SA are

‘reasonable’, therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unsuitable, unavailable or undeliverable.

With this in mind, the SA for the EAP assessed:

- Strategic Objectives
- Strategic Options
- Strategic Principles and Development Principles
- Site allocation options
- Cumulative impacts

The SA was subject to a number of technical difficulties and limitations, such as changes to local and national policies, difficulties with periods of uncertainty with regard to Government announcements about HS2 and changes to station designs as well as uncertainty around costs of development.

Appraisal of Strategic Objectives

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

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

Appraisal of strategic options

The EAP Update policies and the site allocations should support and deliver a preferred growth and spatial strategy. The options for delivering new development in the Euston area are inherently limited given the limited availability of developable land which has been reduced since the EAP was adopted in 2015. Options for maximising housing and economic growth in Euston depend to a large extent on how much space is enabled for development above the tracks and parts of the Network Rail station and surrounding area within the masterplan area for the Department for Transport. In addition, the densely developed nature of the area; heritage considerations, open space and other site constraints; and the need to balance competing land use priorities also limit the amount of growth potential.

In light of the updated EAP objectives, the changing wider context and updated strategies and policies, the following reasonable alternatives (RAs) have been explored in respect of:

- *Issue 1. Approach to level of growth*
- *Issue 2. Approach to land use taking into account reduction in land available for development in the Euston Stations Masterplan area*

- *Issue 3. Approach to building heights*
- *Issue 4: HS2 Station Design, futureproofing and station expansion*

The revised SA in 2025 provides an evaluation of policy options to ensure that negative impacts on sustainability are minimised and benefits maximised. The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. There will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with the NPPF will also be taken into account by plan-makers when selecting preferred options for their plan. For this SA, a number of strategic options have been evaluated and the Sustainability Appraisal has produced the following recommendations regarding the strategic options:

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|-----------------|--|
| Issue 1: | Approach to level of growth |
| Option 1b) | Reduce indicative capacity shown in the EAP to reflect site constraints and emerging station designs/ principles |
| Issue 2: | Approach to land use taking into account reduction in land available for development in the Euston Stations Masterplan area |
| Option 2b) | Proportionally distribute land uses across the station masterplan area. |
| Issue 3: | Approach to building heights |
| Option 3b) | Increase indicative height on sites in line with the London Viewing Management Framework (LVMF) |
| Issue 4: | HS2 Station Design, futureproofing and station expansion |
| Option 4a) | HS2 6 platform station with futureproofing to provide future station expansion with development above futureproofed area |

While housing remains a priority for the Council, viability challenges and site constraints—especially over the station—limit what can be delivered. London Plan policies prioritize commercial uses in the Central Activities Zone, leveraging Euston’s location within the Knowledge Quarter. Early viability assessments suggest that maximizing commercial development above the station could help fund residential development in more constrained areas like the Cutting. The sites that are not affected by station infrastructure will be prioritized for housing. Therefore, the plan retains the 2015 EAP approach with priority for commercial uses over the station.

The SA considers the approach to building heights in the EAP. The case for taller buildings at Euston is primarily linked to viability and the potential to deliver more residential floorspace, including affordable housing and employment space. Allowing height in strategic locations could be acceptable if proposals demonstrate clear environmental and social benefits—such as creating additional open space at ground level. The SA considers that taller buildings also help address viability challenges of building over transport infrastructure.

The SA considers the strategic options of how development is provided at HS2 station

with a six-platform station with future-proofing and development above offering the most comprehensive benefits. It enables significant social and economic gains sooner, supports green infrastructure, open space, and improved urban realm with better east-west and north-south connectivity and active travel. By not future-proofing development, this would pose major risks, including future disruption and environmental/social impacts. The EAP promotes commercial development within the station area and requires the design to be comprehensive and exemplary, to support increased biodiversity, minimise water runoff minimization, and energy harvesting opportunities.

Overall, it is considered that the strategic objectives achieve the aim of sustainable development. There are not considered to be any significant conflicts between the EAP objectives and the sustainability framework. It will be important that one objective does not outweigh or preclude achievement of another objective however it is recognised that it will be a balancing act to meet a range of aims.

Assessment of Strategic Principles and Development Principles

The SA includes an assessment of the following EAP strategic and development principles, providing an assessment against the SA matrix including commentary of the options and the appraisal. Where relevant, the main policy alternatives considered are included and a sustainability appraisal of these main alternatives is provided.

- Overall strategy
- Land use strategy
- Design strategy
- Transport strategy
- Environment strategy
- Open space strategy

The overall EAP strategy has remained largely unchanged from the approach taken in the 2015 EAP. The EAP strategy could generate several positive sustainability impacts. This reflects the fact that the broad intentions of the strategy are to enable the delivery of additional homes, maximising potential economic benefits and locating developments in a way which reduces the need to travel.

The distribution of development, and approach to public realm and urban greening could help to meet a number of the sustainability criteria relating to air quality, sustainable modes of travel, healthy communities and social inclusion. The EAP Update states that in delivery of the overall strategy there is a need to ensure that investment delivers benefits where they are most needed, maximising social value at planning, construction and end user phases plus ensuring that all aspects of development promote health and wellbeing and address concerns around safety and security.

A summary of the strategic and development principles is provided below:

- The **land use strategy** would likely have a positive impact across the sustainability criteria, providing a balance of uses to meet a range of needs and helping to promote national growth with the strengthening of the world leading knowledge quarter inclusive innovation district.
- The **urban design strategy** could also be likely to generate a number of positive impacts, due to the environmental, accessibility and public realm improvements that would result from improved connections, spaces and buildings.

- Whilst the **transport strategy** could also be likely to generate positive impacts, it could have potential negative impacts in terms of noise and air pollution resulting from increased transport provision especially during the project(s) construction.
- The **environmental strategy** could be likely to provide a range of positive impacts due to improvements to energy and climate change mitigation.
- The **Open Space strategy** could give rise to social and local environment benefits resulting from an emphasis on open space and green infrastructure.

The area based principles (Places chapters) cover the following areas:

- Euston station and tracks
- Euston Road
- Camden Cutting
- Drummond Street and Hampstead Road
- Regent's Park Estate
- Ampt Hill & Mornington Crescent Station
- West Somers Town

It was assessed that each would each be likely to generate social, environmental and economic benefits, each providing land use, design, transport/public realm and environmental measures to ensure growth meets sustainability objectives.

The potential for estate renewal, while delivering sustainability benefits overall (for example in relation to the delivery of homes, regeneration and improved streets and spaces), may cause short term disruption to communities due to the level of development activity that may result but has the potential to deliver significant benefits in the longer term.

The assessment suggests that overall, the strategic policies in the EAP Update could help to deliver change which finds an appropriate balance between avoiding significant adverse effects in the Euston area and supporting sustainable development line with legal and planning requirements. Furthermore, when looking at the effects of the policies, it is important to note that, in the majority of cases, where negative effects are identified, these can be mitigated by other policies in the Plan, and that the EAP should be read as a whole and in conjunction with the Camden new Local Plan as planning applications will be assessed against the Development Plan in its entirety.

Assessment of Site allocation options

All site allocations proposed in the EAP Update seek to maximise the benefits of regeneration and promote sustainable communities. Some of the sites such as Euston Station and the sites on Euston Road will form part of a mixed-use redevelopment schemes therefore would not necessarily maximise the provision of housing and affordable housing compared to if the site was developed solely for residential development. However, within the existing policy constraints and in order to provide an appropriate mix of uses they could meet a number of the other sustainability objectives, including maximising the benefits of regeneration.

The SEA Regulations require that the alternative site allocations considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. The 13 sites that are taken forward in the EAP Update for allocation have been assessed against the sustainability objectives.

Assessment of Cumulative impacts

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

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

The Euston Area does not exist in isolation and is part of the London Borough of Camden. Development within the Borough and in neighbouring boroughs will result in cumulative effects, for example through the generation of additional traffic. The Council will therefore continue to work closely with its neighbours and the Greater London Authority to make sure that plans are co-ordinated to provide an integrated approach to maintaining and enhancing quality of life for residents, workers and visitors, and to ensure that a high quality and resilient environment is created.

Conclusion

The overall EAP strategy and objectives have remained largely unchanged from the approach taken in the 2015 EAP. The EAP strategy could generate positive sustainability impacts. This reflects the fact that the broad intentions of the strategy are to enable the delivery of additional homes, maximising potential economic benefits and locating developments in a way which reduces the need to travel. The landuse strategy and policies outlined in the Euston Area Plan Update Proposed Submission Draft perform better than the reasonable alternatives assessed and reflect the most deliverable option. The EAP Update is expected to have a positive impact on social, economic, and environmental objectives. Many of its policies are likely to deliver significant benefits across a wide range of sustainability issues, as evidenced by the cumulative positive effects identified in Chapter 11 of the Sustainability Appraisal (SA) Report.

While the scale of development proposed may pose risks to Camden's biodiversity, heritage assets, and air quality, the Plan with Local Plan includes a robust set of policies designed to avoid or mitigate these impacts. Camden also recognises that it does not operate in isolation. With neighbouring boroughs planning substantial development, cumulative effects—such as increased traffic during construction are anticipated. To address this, the Council will continue working closely with adjacent boroughs and the Greater London Authority to ensure coordinated planning. This collaborative approach aims to protect and enhance the quality of life for residents, workers, and visitors, while fostering a high-quality, resilient environment.

The appraisal indicates that overall, the proposed updates to the EAP will promote sustainable development. It found that the proposed amendments to the EAP will help to address identified economic inequalities, with positive effects through a strong focus on inclusive growth. The appraisal identified the potential for some negative environmental and social impacts of major development which should be mitigated in accordance with adopted EAP policies. Overall, the policies and updates provide a strong positive framework to guide future sustainable development. All site allocations have sought to

make the most efficient use of land and buildings available in accordance with established policy.

Next steps

This SA Non-Technical Summary will be available for comment on the Council's website, alongside the main SA Report, as part of the consultation on the Euston Area Plan Update Proposed Submission Draft.

Representations received will be submitted with the Plan and supporting documents to the government currently planned for late Spring 2026. The Plan will then be examined by a Planning Inspector. The examination will include public hearing sessions involving interested parties and other participants invited by the Inspector. These are expected to take place in late 2026 (timetable will be determined by the availability of an Inspector).

Following receipt of the Inspector's report and consideration of any recommended amendments, the final version of the Euston Area Plan Update will be reported to Cabinet and Full Council for adoption.

When the Plan is adopted a 'SA Adoption Statement' must also be published, which sets out certain information including monitoring indicators. It is then for the Council to choose an appropriate monitoring framework in light of practical considerations around available resources.