

Health Impact Assessment of the Submission draft Euston Area Plan Update

Camden Council Euston Regeneration Team

Introduction

- 1.1 The Council will be publishing the draft updated Euston Area Plan for consultation in 2025. The updated Euston Area Plan sets out the Council's vision for future development in Euston and includes the planning policies and principles to help achieve this. Along with the Local Plan's Development Policies, it is in effect the spatial vision for achieving Camden's corporate strategy, *We Make Camden* in the Euston area and is also closely aligned with the Joint Health and Wellbeing Strategy, with similar ambitions described in both documents.
- 1.2 The original Euston Area Plan was produced as a joint planning document by Camden Council, the GLA and TfL in 2015 to promote a high-quality redevelopment of Euston Station and to shape change in this transitional area maximising regeneration potential in the period up to 2031. The Euston Area Plan is now being updated to reflect changes since adoption with the period extended up to 2047.
- 1.3 The Euston Area Plan forms part of Camden's statutory development plan, alongside the Development Policies, Site Allocations, North London West Plan and Neighbourhood Plans, which together form the Local Plan. The draft new Camden Local Plan is at Proposed Submission stage and once adopted will replace the 2017 Camden Local Plan.
- 1.4 A Health Impact Assessment of the draft Camden Local Plan was undertaken, in discussion with Camden's Health and Wellbeing department and other key stakeholders, to ensure that a 'population health' approach was embedded in policy and reflected in the proposed strategy. This Health Impact Assessment of the Euston Area Plan adopts the same methodology.

Purpose of the report

- 1.5 To assess the health impact of the policies in the updated Euston Area Plan a Health Impact Assessment has been undertaken by Camden Council, drawing on the Health Impact Assessment of the draft Local Plan (2024) which was undertaken by Camden's Health and Wellbeing Department in partnership with the NHS London Healthy Urban Development Unit.
- 1.6 Health Impact Assessment (HIA) is a practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups. Recommendations are produced for decision-makers and stakeholders, with the aim of maximising the proposal's positive health effects and minimising its negative health effects.
- 1.7 This Health Impact Assessment of the updated Euston Area Plan approaches the potential health impact of the updated Euston Area Plan through two lenses:
 - Its alignment with the direct and indirect aims of improving health and reducing health inequalities described in *We Make Camden* and the Joint Health and Wellbeing Strategy, and the policies in the draft Local Plan; and
 - An assessment those determinants of health which are likely to be influenced by specific development policies within the updated Euston Area Plan using

the NHS London Healthy Urban Development Unit's Rapid Health Impact Assessment Tool

1.8 The NHS London Healthy Urban Development's Health Impact Assessment Tool helps identify those determinants of health which are likely to be influenced by specific development policies. It does not identify all issues related to health and wellbeing but focuses on the built environment and issues directly or indirectly influenced by planning decisions.

Key findings

1.9 Overall, this HIA finds that the updated Euston Area Plan has a positive impact on improving health and reducing inequalities, particularly the inclusion of Health and Wellbeing as a key strategic principle.

1.10 It is important to note that the updated Euston Area Plan should be read alongside the Local Plan, as both are part of the formal Development Plan.

1.11 Some recommendations are made to strengthen the policies, including

- Strengthen **Strategic Principle EAP 1G** to ensure HIAs inform design as proposals/applications come forward. Include a framework for assessing these sites when HIAs are submitted at application stage.
- Add 'accessible' to **EAP 1E** for community infrastructure.
- The EAP could more explicitly address **health risks from construction, loss of open space**, and **air quality impacts** during the HS2 construction phase and set expectations for mitigation.

Review of health impacts contributing to We Make Camden and Joint Health and Wellbeing Strategy ambitions

2.1 We Make Camden is the Council's corporate strategy. It sets out what the Council wants to collectively achieve and lead together with all those who have a stake in the Borough. It was developed following conversations with residents, partners and community leaders.

2.2 The draft updated Euston Area Plan sets out the Council's vision for future development in Euston for the period up to 2047, with planning policies to inform and shape how the borough develops to reflect the six key ambitions set out in We Make Camden, which are closely aligned with the three long-term ambitions of the Joint Health and Wellbeing Strategy 2022-30.

A comparison of the ambitions is set out in table 1 below.

Table 1: A comparison of the ambitions set out in We Make Camden and the Joint Health and Wellbeing Strategy 2022-30

We Make Camden ambitions	Joint Health and Wellbeing Strategy long-term ambitions

Camden is a borough where every child has the best start in life.	Start well: All children and young people have the fair chance to succeed, and no one gets left behind.
Camden's local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life.	Live well: People live in connected, prosperous and sustainable communities. Age Well: People live healthier and more independent lives, for longer.
Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute.	
Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well.	
Everyone in Camden should have a place they call home.	
Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.	

2.3 This section of the Health Impact Assessment of the updated Euston Area Plan examines the Plan in the context of these ambitions.

Camden is a borough where every child has the best start in life

2.4 Giving children the best possible start in life is crucial to their future health and wellbeing – and to reducing inequalities across the life course. Direct contributions include:

- **Early Education and Childcare:** The plan includes infrastructure provisions for education infrastructure that would include accessible early education and childcare.
- **Primary and Secondary School Provision:** There is ongoing planning and monitoring to ensure sufficient school places are available, considering demographic changes and housing developments, as part of the Local Plan, this would feed into infrastructure requirements in the Euston Area. The updated Euston Area Plan identifies that based on current population trends and existing

and future capacity in local schools, it is expected that the level of growth anticipated in the plan can be accommodated in existing facilities to be funded through CIL contributions.

2.5 Childcare is an important component of a best start in life. Research shows that high-quality childcare can have long-term benefits for children, including increased cognitive abilities, improved language development and better relationships with peers. Affordable childcare provides the opportunities for parents to work, increasing families' financial resources to support the best start in life.

Housing

2.8 Housing plays an important role in underpinning a child's best start in life, in addition to being a key factor in helping to

- reduce inequalities
- improve health and wellbeing
- support people to reach their full potential

2.9 Strategic Principle EAP 1 identifies between approximately 1,500 and 2,500 additional homes should be provided across the Euston plan area in a mix of unit sizes, and the priority to maximise permanent self-contained homes to meet local housing need, and to maximise good quality genuinely affordable housing.

Nutrition

2.10 Children's earliest experiences of food can shape lifelong habits and establish their long-term relationship with food. A lack of sufficient nutrition during critical periods of pregnancy and in early life adversely affect development and increase risk of chronic disease in later life.

2.11 The supporting text to Strategic Principle EAP 1 identifies that the potential impacts of food, drink and entertainment uses will need to be managed, including the need to avoid over concentration of such uses.

2.12 Improving the quality of the food environment around schools has the potential to influence children's behaviour through their food and drink purchasing habits. The Council is working to improve school meals and increase the provision of breakfast clubs, deliver the Holidays and Food programme, as well as delivering programmes such as the Families for Life and Family Kitchen family healthy lifestyle and cooking programmes are free universal healthy lifestyle programmes for families with children aged between 2-11yrs old to support them to cook, eat healthily, increase physical activity and make positive behaviour changes.

Physical activity

2.13 Physical development is central to children's health and fitness and provides the foundations for later participation in and enjoyment of physical activity and sport. All children in the early years stage should have safe, stimulating and accessible physical activity - both in safe, comfortable homes and outdoors in play areas, as well as active travel opportunities in their community.

2.14 Strategic Principle EAP 5 requires the re-provision of open space lost as a result of HS2, and new and improved open spaces to be provided as part of new development in accordance with Camden and London Plan policy, including the provision of play space and amenity space to meet residents' needs.

The supporting text identifies that open space should have a range of different functions, and states that in meeting the needs of residents, particular regard should be given to provision of play space, spaces for young people and creating opportunities for exercise, socialising and fostering health and wellbeing.

Air Quality

2.16 Strategic Principle EAP 3 (Transport) and 4 (Environment), alongside the Council's Clean Air Strategy, Climate Change Action Plan and Transport Strategy, seeks to reduce air pollution. Air pollution particularly impacts children and young people because it can hinder lung growth, inhibit brain development and increase the risk of conditions such as asthma resulting in lifelong health problems.

Camden's local economy should be strong, sustainable and inclusive - everyone should have a secure livelihood to support them to live a prosperous life

2.17 The Euston Area Plan seeks to ensure that Euston's local economy is strong, sustainable, and inclusive, aiming for all residents to have a secure livelihood and live prosperous lives. Key components include:

- **Maximising Opportunities for All Residents:** The plan emphasises creating opportunities for Camden residents, businesses, and the voluntary sector to contribute to and share in Euston's economic growth. This involves supporting a range of business activities and ensuring the provision of affordable workspace and that development should provide education and training opportunities.
- **Supporting Diverse and Inclusive Employment:** The plan aims to address areas of relative disadvantage in the Euston area, particularly income and employment deprivation due to low pay, insecure work, and unemployment, by securing significant new job and training opportunities for local people. Younger residents, Black, Asian, and Other Ethnic communities, and disabled people tend to be under-represented in higher-skilled occupations. By tackling this, the plan aims to reduce poverty among working people and provide a financial stake in the economy for all residents.
- **Addressing Barriers to Employment:** The plan includes measures to support local business start-ups, entrepreneurs, and residents seeking work. This involves providing access to jobs, skills, education, and training opportunities. Development in the Euston area is expected to provide a range of unit sizes to increase the supply of space for smaller businesses and entrepreneurs, ensuring that employment spaces are well-laid out and adaptable to changing working practices.

- **Ensuring Equitable Outcomes:** Recognising that the success of Euston's economy is not equally shared, the plan highlights the importance of achieving equitable outcomes for all residents. This includes supporting health and wellbeing by addressing social determinants such as education, employment, housing, and the local environment. Planning policies are designed to improve physical and mental health and well-being, particularly in the most deprived areas.
- **Promoting a Strong and Resilient Economy:** The plan also focuses on reinforcing existing economic, knowledge, cultural and community assets and businesses, by the provision of premises available on a range of terms and conditions to accommodate businesses with differing resources. This includes prioritising space for key growth sectors, research-based activities, creative industries, start-ups, smaller businesses, and social enterprises. The aim is to support a strong, diverse, sustainable, and inclusive economy

Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute

2.18 The updated Euston Area Plan addresses injustice and inequality through prioritising local people's needs to ensure that new development meets local needs, providing new homes (including affordable), jobs, businesses, community facilities and open space in the Euston area.

Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well

2.19 The Euston Area Plan seeks to improve physical and mental health by addressing the social determinants of health through planning and development. Key components include:

- Strategic Principle EAP 1 encourages designs that support healthier living and working environments; and promotes physical activity and mental well-being by ensuring developments are safe, accessible, and supportive of healthy lifestyles. It also requires Health Impact Assessments for developments to be submitted and seeks for them to be undertaken at an early stage and used to inform and improve development proposals, to maximise positive impacts and minimise negative ones.
- Strategic Principle EAP 1 promotes affordable, well-designed housing to reduce overcrowding and improve living conditions, crucial for addressing health inequalities.
- Strategic Principle EAP 1 emphasises protecting and enhancing social infrastructure and open spaces, reducing loneliness and enhancing social inclusion, which are important for mental health.

- Strategic Principle EAP 3 promotes physical activity through active transport measures.
- Strategic Principle EAP 4 aims to address the impact of climate change by promoting development that reduces the risks of extreme weather, which can directly affect health.
- Strategic Principle EAP 5 promotes the provision of new and improvements to existing open space and green infrastructure which can directly improve health.

Long term changes identified in We Make Camden

Our neighbourhoods support and improve good population health, and our services come together to support wellbeing in our communities.

2.20 The updated Euston Area Plan integrates health considerations into all aspects of development, aiming to create healthy living environments and reduce health inequalities. Key measures include promoting good quality, affordable housing, and ensuring buildings and places are designed to promote healthy behaviours and inclusivity.

2.21 Population health is an approach that aims to improve physical and mental health outcomes, promote wellbeing and reduce health inequalities across an entire population.

Everyone in Camden eats well every day, with good quality food that is nutritious, affordable and sustainable.

2.22 The Plan supports healthy eating by improving access to healthier food choices and increasing opportunities for food growing. This is addressed through specific policies that encourage the provision of spaces for community gardens and allotments.

2.23 Whilst it is unlikely that a large proportion of Camden's food is grown locally, this policy is likely to encourage residents to focus on the nutritional value of food and the benefits of eating healthy diets.

2.25 The planning class use system includes supermarkets and convenience stores within the general class of shops and retail outlets, so the provision of retail food is subject only to market forces. Furthermore, it is not possible for the planning system to distinguish between for example a premium supermarket and a discounter supermarket. As such, it is difficult to use the planning system to tackle issues such as food deserts, i.e. areas where there is no convenient access to affordable nutritious food. Strategic Principle EAP 1 identifies the need for a supermarket in the Euston area, based on local residents' representations.

Everyone knows how to take charge of their own health and wellbeing, and be encouraged and supported to keep active, eat well and stay healthy.

2.26 The key to this change is consistently making the healthiest choice the easiest choice. The Euston Area Plan integrates multiple strategies to make the healthiest choices the easiest choices, focusing on health and wellbeing, housing, green spaces, and community facilities.

2.27 Examples of key elements that highlight how the plan enables everyone to know how to take charge of their own health and wellbeing, and be encouraged and supported to keep active, eat well and stay healthy include:

- **Promoting Health and Wellbeing:** Strategic Principle EAP 1 Part G Health and wellbeing outlines the commitment to improving the physical and mental health of residents. The policy mandates that new developments be designed to promote good health, support active lifestyles, and provide safe and accessible environments. Furthermore, Health Impact Assessments (HIAs) are required for development at Euston to identify and mitigate potential adverse health impacts early in the planning process.
- **Supporting Active Lifestyles:** The plan emphasises the importance of designing environments that encourage physical activity. This includes creating pedestrian-friendly streets in line with the Mayor's Healthy Streets approach, ensuring access to parks and recreational areas, and providing cycling infrastructure.
- **Enhancing Green Spaces and Biodiversity:** The plan calls for the enhancement of Euston's natural environment through new green infrastructure, re-provision of open space lost as part of HS2, the provision of new open space and improvements to existing spaces.
- **Providing Diverse and Inclusive Housing:** Strategic Principle EAP 1 part B Homes aims to create mixed, inclusive, and sustainable communities by offering a variety of housing types that cater to different needs and prioritises good quality genuinely affordable self-contained homes. The Council promotes the development of accessible and adaptable housing, ensuring that new homes can meet the changing needs of residents over their lifetimes.
- **Ensuring Accessible Community Facilities:** Strategic Principle EAP 1 part E states: New community infrastructure should be provided to support new development, reflecting local priorities and need in line with Local Plan policies. Local plan policies require accessible community facilities so that all residents, including those with disabilities, can benefit from these facilities.
- **Addressing Social and Economic Inclusion:** The plan promotes social and economic inclusion by supporting developments that provide affordable housing and community spaces, reducing social polarisation, and fostering multi-generational living.

2.28 In summary, the updated draft Euston Area Plan seeks to create an environment where the healthiest choices are the easiest choices by promoting health and wellbeing, supporting active lifestyles, enhancing green spaces, providing diverse housing options, ensuring accessible community facilities, and fostering

social and economic inclusion. These strategies collectively aim to improve the quality of life for all Camden residents.

Recommendation: Add to Strategic Principle EAP 1G “Health Impact Assessments should make clear that the design of the proposed development makes the healthiest choice the easiest choice.”

Add “accessible” to Strategic Principle EAP 1E: New “accessible” community infrastructure...

Everyone in Camden should have a place they call home

2.29 Living in good quality and affordable housing is associated with numerous positive health outcomes for the general population and those from vulnerable groups. The Local Plan outlines several strategies and policies aimed at ensuring "everyone in Camden should have a place they call home." Key contributions include:

- **Maximising Affordable Housing:** The plan emphasises the importance of maximising the supply of self-contained and affordable housing. This includes targeting a goal of 1,500 to 2,500 additional affordable homes in the Euston area and ensuring that new development contributes to this goal.
- **Protecting Existing Affordable Housing:** The plan seeks to protect and improve the existing stock of affordable housing. This involves supporting the regeneration of estates to provide better and more affordable homes through the Community Investment Programme (CIP).
- **Community Investment Programme (CIP):** This program focuses on refurbishing parts of Council estates and redeveloping others to ensure that tenants live in good quality accommodation. The CIP aims to deliver 4,850 new homes, including 1,800 new or replacement Council homes and 350 new intermediate homes for rent.
- **Ensuring Flexibility and Inclusiveness:** The plan prioritises the delivery of self-contained homes, which can cater to a variety of household types, ensuring flexibility and inclusiveness. This approach supports diverse occupancy and aims to meet the contemporary and future needs of Camden’s residents.

2.30 These measures collectively contribute to the overarching ambition that "everyone in Camden should have a place they call home" by increasing the availability of affordable housing, protecting existing housing stock, refurbishing and redeveloping estates, and making efficient use of vacant properties.

Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency

2.31 The updated Euston Area Plan outlines various strategies and policies to achieve the ambition that "Camden should be a green, clean, vibrant, accessible,

and sustainable place with everyone empowered to contribute to tackling the climate emergency." These contributions include:

- **Zero Carbon Development:** The plan mandates that new developments achieve zero carbon emissions, optimise resource efficiency, and are designed to adapt to and mitigate the effects of climate change. This includes setting high environmental standards for buildings and spaces.
- **Enhancing Green Infrastructure:** Camden's biodiversity strategy, "Creating Space for Nature in Camden," aims to protect and enhance nature and biodiversity. This strategy will be supported by the Local Nature Recovery Network and the Green Infrastructure Strategy, promoting a network of green spaces across the borough.
- **Sustainable Urban Drainage Systems (SuDs):** The plan requires the inclusion of multi-functional SuDs in developments to manage water sustainably and reduce flood risks.
- **Green and Open Spaces:** The plan emphasises the conservation and enhancement of Camden's network of open spaces, including parks, gardens, and green corridors. These spaces are crucial for biodiversity and provide residents with access to nature.
- **Air Quality Improvement:** The plan includes measures to protect air quality, which is essential for creating a healthy and clean environment.
- **Promoting Active Travel:** The plan encourages active travel by improving local connections and infrastructure for walking and cycling. This supports health and reduces reliance on cars, thereby lowering emissions.
- **Community Involvement:** The plan supports community-led initiatives and empowers residents to contribute to tackling the climate emergency through local projects and strategies, such as the Citizen Scientist community research program.
- **High-Quality, Inclusive Design:** New buildings and public spaces are required to be of high design quality, inclusive, accessible, safe, and welcoming. This ensures that developments meet the needs of Camden's diverse population and contribute to the vibrancy and sustainability of the area.

2.32 Through these policies and strategies, the Euston Area Plan aims to make Euston a green, clean, vibrant, accessible, and sustainable place, while empowering everyone to contribute to tackling the climate emergency.

The Camden Joint Health and Wellbeing Strategy 2022 – 2030

2.33 The purpose of Camden's Joint Health and Wellbeing Strategy (JHWS) is to set out the shared principles, long-term ambitions and short-term priorities of the Camden Health and Wellbeing Board for improving health and wellbeing and reducing health inequalities. It is the strategy of the Joint Health and Wellbeing Board, which brings together the Council, NHS and voluntary and community sector to tackle inequalities, support the integration of health and care services, and

ultimately improve the health of local people. The updated draft Euston Area Plan overlaps with the JHWS on a number of themes and objectives:

- **Health and Wellbeing:** Both documents emphasize improving health and wellbeing, although the JHWS focuses more on direct health outcomes and tackling health inequalities, and while the Euston Area Plan identifies health and wellbeing as a strategic principle, it incorporates health as part of broader community and environmental planning.
- **Social Determinants of Health:** The JHWS addresses social determinants like poverty, education, and employment directly, while the Euston Area Plan focuses on providing affordable housing, enhancing community facilities, and supporting local economies, which indirectly impact health.
- **Sustainability and Quality of Life:** The Euston Area Plan's commitment to environmental sustainability and creating vibrant communities supports the JHWS goals of promoting healthy environments and lifestyles.
- **Community Engagement:** Both strategies highlight the importance of involving local communities and stakeholders in planning and decision-making processes to ensure that policies meet the needs of Camden's residents.

2.34 In summary, while the Camden Joint Health and Wellbeing Strategy 2022-2030 focuses specifically on health outcomes and reducing health inequalities, the Euston Area Plan takes a broader approach to improving quality of life through sustainable development, housing, and economic growth in Euston. In doing so, the Euston Area Plan sets the policy framework and conditions to support the objectives of the Joint Health and Wellbeing Strategy.

Health Impact Assessment of the updated Euston Area Plan 2025 using the NHS London Healthy Urban Development Unit matrix

3.1 This Health Impact Assessment of the updated Euston Area Plan assesses the plan in the context of those wider determinants, using a framework described in the London Healthy Urban Development Unit's "Rapid Health Impact Assessment Tool". The assessment tool takes an evidence-based approach to integrating health into urban planning, and takes into account legislation and policy changes both nationally and in London that relate to health and spatial planning.

3.2 The Rapid Health Impact Assessment Tool identifies eleven broad determinants that can be influenced by spatial planning:

- Housing quality and design
- Access to healthcare services and other social infrastructure
- Access to open space and nature
- Air quality, noise and neighbourhood amenity
- Accessibility and active travel
- Crime reduction and community safety
- Access to healthy food
- Access to work and training

- Social cohesion and lifetime neighbourhoods
- Minimising the use of resources
- Climate change

3.3 The initial scoping stage (see Appendix 1) analyses which policies described in the Euston Local Plan have the greatest direct impact on health and require further analysis. It is recognised that most if not all policies may have some impact on health.

3.4 Those policies were then assessed against the determinants in the HUDU Rapid Health Impact Assessment Tool considering evidence and best practice from elsewhere. A gap analysis was also undertaken ensure that the updated Euston Area Plan addresses all of the determinants.

3.5 An analysis has not been undertaken for the Development Principles set out in chapter 4: Places of the Euston Area Plan as these chapters detail the Euston sub-area site allocations and there is a requirement for a separate HIA for each of the sites as they come forward for development, as set out in Strategic Principle EAP 1.

Policy	Analysis
Housing quality and design	
Strategic Principle EAP 1: Land use	Part B (Homes) of the policy sets out the overall mix of land uses in the Euston Area, and identifies that between 1,500 and 2,500 additional homes along with the provision of appropriate replacement homes should be provided as a mix of unit sizes. The policy aims for at least 75% of new housing to be provided as permanent self-contained homes, with other housing types including student housing. Housing availability directly impacts on health. Having enough housing to meet demands will assist in ensuring that more people can remain in the area and will add to social cohesion and prevent issues from overcrowded accommodation other benefits to health. This is key to ensuring that everyone in Camden should have a comfortable place to live and that Camden has enough decent, safe, warm, and family-friendly housing to support our communities. The policy seeks the maximum reasonable amount of good quality, genuinely affordable housing in accordance with Local Plan and the London Plan policy. This will encourage more inclusive environments and allow more people to remain and live in Camden which will positively contribute to health and wellbeing. The policy also aims to deliver improvements to existing housing estates through the provision of new, refurbished and replacement housing where appropriate. Good quality, affordable housing can have positive impacts and is an important determinant of health. The provision of affordable housing could increase diversity of the community and improve perceptions of safety, particularly amongst low-income groups. The provision for affordable student housing will enable students from less well-off backgrounds to have the same opportunities as others. Part H (safety and security) seeks new development to play an active role in developing to ensure that streets and spaces are safe and enjoyable to use. Safe streets and neighbourhoods can have a positive impact on health and wellbeing, particularly by improving perceptions of safety and enabling more active lifestyles and preventing feelings of loneliness and isolation. Part I (Inclusive growth and delivering social value) requires new development to contribute to reducing inequalities and increasing life chances in local residential communities, ensuring that investment delivers benefits where they are most needed. Maximising social value at all stages, including supporting increased access to jobs, skill training and education opportunities

Policy	Analysis
Policy EAP 1: Land Use	The supporting text to Part B: Homes sets out the expectation that housing development should meet the residential design standards in the Local Plan and London Plan and the Mayors Supplementary Planning Guidance. This can help reduce the likelihood of overcrowding for families. Overcrowded conditions in childhood are associated with increased risk of respiratory illness and meningitis and damp and mould. Comfortable living conditions contribute to residents' mental wellbeing. The text identifies that particular regard should be given to the need to avoid and mitigate the potential impacts of noise and vibration from transport infrastructure and services. Noise and vibration can have significant impacts on health by restricting sleep and causing distress and disturbance.
Policy EAP 2: Design	The policy seeks to ensure that development will create an integrated, well-connected place of the highest urban design quality and sets key urban design principles, including connectivity, public realm, open space, activation and architecture. The quality of the places people live and work can have an impact on their health and wellbeing.

Policy	Analysis
Access to healthcare services and other social infrastructure	
Policy EAP 1, part E: Social infrastructure, and part G: Health and wellbeing	Part E of the policy identifies that education, health and other social and community infrastructure should be provided to support new development, reflecting local priorities and need in line with Local Plan policies. The policy requires an application for the Euston Station Masterplan to be submitted with a Community Strategy to inform the appropriate type and scale of facilities. Provision of suitable education establishments can have an overall positive impact on health and wellbeing through creating opportunities to improve education and gain better employment. Provision of accessible healthcare facilities and other social and community can improve physical and mental health and wellbeing of all people and support healthier communities and reduce health inequalities. Part G of the policy aims to engender a positive approach to health and wellbeing in combination with the London plan and Local plan. The policy requires applications for major development at Euston to include a Health Impact Assessment. The use of Health Impact Assessments for major developments is supported as this will assist in identifying the unique health issues of an area and whether there is currently sufficient infrastructure in the area. The policy could be strengthened by highlighting that the HIA should inform the design and layout of new buildings and therefore the policy could be strengthened by highlighting this.

Policy	Analysis
Strategic Principle EAP 5: Open space and green infrastructure	The policy seeks the provision of new open space and enhancements to existing spaces to improve access and contribute to health and wellbeing, which would have a positive impact by increasing activity and therefore decreasing the likelihood of cardiovascular diseases and other long term health issues. There is evidence that the mental and physical health benefits of amenity space and landscaping varies with the quality of these spaces.
Access to open space and nature	

Policy	Analysis
Strategic Principle EAP.5 Open Space and Green Infrastructure	The policy seeks the provision of new open space and enhancements to existing green spaces to improve access for all, support biodiversity and promote play to contribute to health and wellbeing, which would have a positive impact on health as it would encourage more active lifestyles and access to fresh air. Reference is also made to the need to meet demand from new development but acknowledges that it may be challenging for some constrained sites to meet the full open space needs generated by development. It is welcomed that there is a requirement to for applications for development to include a Public Open Space and Green Infrastructure Strategy and Management Plan, to ensure a comprehensive approach that addresses open space needs and priorities and contributes to health and wellbeing. The provision of new open space and opportunities for play, recreation and sports would contribute childhood development and assist in tackling key health issues such as obesity in children.
Accessibility and active travel	

Policy	Analysis
Strategic Principle EAP 3: Transport	The policy identifies the key transport objectives associated with the Euston station and surrounding area developments, including new and enhanced walking and cycling routes through and around the station and tracks, improving the environment along Euston Road, promoting sustainable and active travel and enhancing existing public transport. The policy prioritises the delivery of safe, active, healthy, affordable and sustainable transport, which could have a positive benefit on people's health and wellbeing as well as benefits for the climate and for reducing air pollution. There is also an emphasis on making streets more attractive for pedestrians and cyclists, and the creation of new routes to improve connectivity. Increasing the attractiveness of active travel will have a positive impact on health. The reference to TfL's Healthy Streets Framework is welcome, it states that the framework should underpin and inform all transport and place making proposals developed on streets and the public realm in and around Euston to ensure streets are delivery positive public health outcomes, in line with the Euston Health Streets vision. Ensuring that walking, cycling and public transport is an attractive transport option will reduce reliance on cars and aid in improving air quality and making the roads less congested and therefore more attractive to active modes of transport, which will have a positive impact on health. Improved access to public transport also would contribute to a reduction in health inequalities by improving access to employment, educational opportunities and to other services. There is an acknowledgement that a level of taxi and private hire vehicle (PHV) is required to meet the needs of station users including passengers with reduced mobility, without over provision. Access to Taxi and PHV contributes to a reduction in health inequalities as above, but an overprovision could compromise the public realm and add to air pollution. Construction Management Plans (CMPs) are expected for major developments to address transport/highways and environmental health impacts as well as cumulative construction impacts.
Crime reduction and community safety	
Strategic Principle EAP 1: Land use strategy	Part H seeks to ensure the long-term safety of streets and spaces are safe to enjoy and use. Lack of safety and perception of lack of safety can impact how people's health and wellbeing, including activity levels and social interaction, and this disproportionately impacts disadvantaged groups. It is welcomed that the policy requires working with the community to improve safety.

Policy	Analysis
Access to healthy food	
Strategic Principle EAP 1: Land use strategy	The policy aims for the new and replacement retail offer to meet the needs of local residents, for example supermarket provision, which would increase access to healthy food for residents. Reference is also made to Camden's Local Plan policies on managing the impacts of food and drink uses, including measures to prevent children, and adults, from making unhealthy food choices.
Access to work and training	
Strategic Principle EAP 1	Part C identifies the economic and employment benefits the redevelopment will bring, including 8,000 to 17,500 additional jobs. The requirement for an Employment, Learning and Training Strategy to be submitted as part of any masterplan, to build upon the Euston Partnership's Social Value Charter, is welcomed. Part I requires new development to maximise social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and educational opportunities. The policies aim to maximise the benefits from new development and new jobs for the local community, and a commitment from Camden Council working with the Euston Partnership (or its successors) to agree measures to enable local people to access employment opportunities and training to enable them to fill future good quality positions generation by the development, and would contribute to minimising the rate of unemployment and the associated negative health impacts.
Minimising the use of resources	
Strategic Policy EAP 4: Environment	The policy seeks to ensure that developments consider the carbon impact from the whole life cycle of the development by assessing all carbon impact, to be submitted as a Whole Life Carbon Assessment as part of a planning application. The policy requires resource efficiency to be considered from the outset of the design process, including how it has been minimised and circular economy principles have been applied. Reference is made to community-led Circular Economy initiatives.

Policy	Analysis
Climate Change / Pollution / Air Quality	
Strategic Principle EAP 4: Environment	The policy requires development at Euston to be delivered in line with Local Plan policies including the requirement to be ultra-low energy, fossil fuel free, use low carbon heat and maximise the opportunity for renewable energy generation. Euston Road is an Air Quality Focus Area within the Camden wide Air Quality Management Area (AQMA), and the policy aims to promote development which contributes to air quality. Poor air quality proven to have an adverse impact on health. Part B requires exploration of innovative heat network opportunities for utilising low cost, low carbon heat. Development should minimise the adverse impacts of overheating and promote natural cooling and passive ventilation, thereby avoiding reliance on air conditioning which would have a positive impact on health and would also assist in reducing the risk of fuel poverty. The policy also aims to minimise the risk of flooding by incorporating SuDS to reduce surface water run-off.
Monitoring and Delivery	
EAP Section 5: Delivery, planning benefits and monitoring	The wording states that Camden Council will monitor the effectiveness of the Euston Area Plan in delivering its objectives. aims to ensure that the vision, objectives and principles of the Euston Area Plan. Camden Council monitors its Local Plan policies by regularly assessing their performance against a series of indicators and publishing the results annually. The Euston Area Plan will also be assessed against these indicators and will publish the results alongside findings of borough-wide monitoring.

Monitoring and Review

4.1 Recommendation: The Council should monitor its Health Impact Assessment policies by recording:

- The number and proportion of major applications that submit a health impact assessment.
- The number and proportion of major applications with the potential to give rise to significant adverse health impacts that submit an HIA. Sensitive uses include education, health, leisure or community facilities, publicly accessible open space, hot food take aways, betting shops and in areas where air pollution and noise issues are particularly prevalent.

4.2 Other recommended indicators are adopted from the Local Plan HIA and are set out by theme in the table below:

Theme	Recommended Indicators
Housing Quality and Design	Life Expectancy Rates of homelessness e.g. no. of people moved from Council's homelessness lists. Recorded cases of dementia Self-reported health Census data Proportion of fully accessible homes (beyond building regulations requirements) Delivery of affordable housing
Access to healthcare services and other social infrastructure	S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services. Percentage of population living within 500m of a GP The number of new publicly accessible toilets and water fountains
Access to Open Space and Nature	Change in areas deficient in open space. Quantity of open space (by type and area) New Recreation and Leisure facilities (sqm).
Accessibility and Active Travel	The number of permissions for car free developments Obesity rates in adults and Children Tfl surveys (use of public transport and active travel)
Crime Reduction and Community Safety	Number of schemes which achieve Secured by Design
Access to Healthy Food	Delivery of food growing spaces/allotments in sqm Planning applications for fast food takeaways and net change Obesity rates in adults and children
Access to Work and Training	Affordable workspace accessible/taken up by local business S106 signed securing local contracts. Net change in industrial/employment floorspace
Minimising the Use of Resources	Achievement of developments with BREEAM 'excellent'.

Climate Change	S106 energy offset payments
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Appendix 1

1. Vision and Objectives	Include in HIA
The Vision for the Euston area in 2051 Objectives 1. Prioritising local people's needs 2. Securing excellent design 3. Making the best use of new space above the station and tracks and opportunities for regeneration in the wider area 4. New streets and enhanced routes 5. Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the Knowledge Quarter inclusive innovation objectives 6. Creating sustainable development 7. Improving the environment along Euston Road 8. Promoting sustainable and active travel 9. Enhancing existing public transport	No
2. Context	Include in HIA
London context A transport hub Local context Character areas Key issues	No
3. Development Strategy	Include in HIA
3.1 Overall strategy	No
3.2 Strategic principle EAP 1 A: Overall mix B: Homes C: Economy and employment D: Retail and Leisure E: Social infrastructure F: Meanwhile uses G: Health and wellbeing H: Safety and security I: Inclusive growth and delivering social value	Yes
3.3 Strategic principle EAP 2: Design Strategy	Yes
3.4 Strategic Principle EAP 3: Transport Strategy	Yes
3.5 Strategic Principle EAP 4: Environment Strategy	Yes
3.6 Strategic Principle EAP 5: Open Space and Green Infrastructure Strategy	Yes

4. Places	Include in HIA
4.1 Euston Station and tracks 4.2 Euston Road 4.3 Camden Cutting 4.4 Drummond Street and Hampstead Road 4.5 Regent's Park Estate 4.6 Ampthill and Mornington Crescent Station 4.7 West Somers Town All site allocations will contain separate HIAs submitted with planning applications	No
5. Delivery, planning benefits and monitoring	Yes