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Department: Planning

Our reference: LDF06/LDD02/LP02/KM1

Date: 3 March 2026

By email:


eustonareaplan@camden.gov.uk

Dear Mary-Ann,

Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Consultation on Euston Area Plan – Regulation 19

Thank you for consulting the Mayor of London on the draft Euston Area Plan (EAP) Regulation 19 document. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and are attached at Annex 1.

The Mayor provided comments on the Euston Area Plan Regulation 18 consultation on 10 March 2023 (Ref: LDF06/LDD22/LP04/MP01). This letter follows on from that earlier advice and should be read alongside the Mayor's previous response.

General

The draft EAP sets out a compelling vision for the future of Euston and the Mayor welcomes the positive and ambitious approach being taken by the London Borough Camden in the EAP. The scale and ambition of the Euston station redevelopment make it a nationally significant project, offering substantial growth opportunities for both London and the wider UK. There is a major commercial opportunity to deliver high quality development on the station site itself—focused on key growth sectors—with additional potential in the surrounding area. The site is uniquely positioned at the centre of the Knowledge Quarter, one of Europe's leading innovation districts.

The GLA and the London Borough of Camden have a shared vision for the future of Euston and are working in partnership on the establishment of a new development corporation to coordinate and oversee the regeneration of the area. GLA officers have met with LB Camden officers regularly during development of the draft EAP and we are pleased to note that these discussions have positively informed the Regulation 19 plan. As currently drafted it is the Mayor's opinion that the Regulation 19 Euston Area Plan is in general conformity with the London Plan.

It is noted that Camden's draft new Local Plan was submitted to the Secretary of State for examination in October 2025, and this includes a policy for the Euston Area to provide the overarching policy context to support the EAP.

Vision and objectives

The Vision for the Euston area in 2051 is to be both a local hub of activity and gateway to London through high quality comprehensive and transformational development above and around a high quality transport interchange. The redevelopment of Euston Station is stated as being central to the vision and objectives of the EAP, with comprehensive redevelopment of the station highlighted as best helping to achieve this vision and the plan objectives. The vision also promotes enhancement of Euston's role as a medical research, knowledge, innovation and creative industries base centred around the cluster of world class education and research institutions in the area. Overall, the vision aligns with the vision for Euston set out in LP2021 Policy SD1 and is supported by the Mayor.

The draft EAP retains the nine objectives included in the Regulation 18 version of the plan, with minor updates. The Mayor welcomes the specific reference to affordable housing that has been added to Objective 1 (Prioritising local people's needs).

Development Strategy

The development strategy sets out the overarching planning framework for the Euston area including the spatial concept, land use strategy, design strategy, transport strategy, environment strategy, and open space strategy.

Within the **land use strategy** section, Strategic Principle EAP1 Part A Overall Mix has been updated to reflect that as designs for the station develop, development above and adjacent to the station should explore opportunities for additional floorspace where this meet wider policies in the EAP, Camden's Local Plan, and the London Plan. These updates remove the reference to exceeding targets (noted as a concern at Regulation 18) and provide helpful clarity about priority land uses should new areas for development be identified through design refinement of the station.

Part B Homes of EAP1 sets out that developments in the Euston area are expected to deliver around 2,000 additional homes, and that optimising the potential of sites to deliver a greater number of homes will be supported. The further refinement of expected housing figures since the Regulation 18 consultation and the reference to optimising the potential of sites to deliver additional homes is welcomed. Appropriate references are also now made to London Plan policy in relation to affordable housing, including in the supporting text in relation to preferred affordable housing tenure, noting that the Mayor has previously indicated support for the proposed approach to affordable housing set out in Camden's draft new Local Plan.

Part C Economy and Employment of EAP 1 sets out that between 215,000sqm and 370,000sqm of employment floorspace (providing between 10,000 and 17,300 additional jobs) are expected to be delivered in the Euston area. The further refinement of the expected employment floorspace/jobs figures since the Regulation 18 consultation is welcomed. The associated new supporting text provides helpful clarification as to why the identified employment floorspace capacity/jobs range is higher than the indicative capacity included in the LP2021 for Euston.

The supporting text to Part D Retail, Leisure and Culture has been updated to include specific reference to consideration of cultural facilities and supporting the objectives of Camden's

Evening and Night Time Strategy. This explicit recognition of the potential role for Euston at night is welcomed.

Within the **design strategy** section, tall buildings are considered under Parts D and E of Strategic Principle EAP2 Design, with locations appropriate for tall buildings indicated in Figure 3.4. Some updates have been made to the wording of Parts D and E to clarify how tall buildings should be designed and make appropriate reference to the draft new Local Plan's definition of tall buildings. These updates provide clarification and Policy EAP2 satisfies the requirements of LP2021 Tall Buildings Policy D9.

Strategic Principle EAP2 has been updated to make specific reference to the need for proposals to take account LVMF policy in relation to the designation Protected Vistas that cross the areas, and the additional supporting text in relation to the Protected Vistas identified in the London View Management Framework (LVMF) that constrain the EAP site is noted. This reflects our comments at Regulation 18 that all protected views should be referenced in the EAP, regardless of whether there are sites identified as appropriate for tall buildings within the viewing corridor.

Additional wording has also been added to clarify that Figure 3.4 and the associated supporting paragraphs provide guidance on locations that may be suitable for tall buildings based on initial testing only. The paragraph goes on to state that precise locations and heights will be the subject of a full and proper testing process including an assessment of impact in line with London Plan policy. It is also stated that careful siting, massing, and detailed design informed by site specific analysis may demonstrate that different heights in some locations could achieve compliance with London Plan and LVMF policy. These clarifications are welcomed.

Local authority policy documents should be developed in general conformity with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). It is important that local policy documents support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. Whilst TfL is broadly supportive of the **transport policies** set out in the EAP, suggested amendments are detailed in the comments in Annex 1.

Places

The aspirations for a comprehensive approach to development at Euston station set out Development Principle **EAP1 Euston Station and tracks** are supported. The updates to the supporting text are noted and together are considered to provide clear guidance about the land use priorities and design/functionality expectations for both the stations and development above or adjacent to the stations. The deletion of the reference to Camden's planning policies applying flexibility in setting out planning requirements in the Viability and Funding section of the supporting text is welcomed.

Delivery, Planning Benefits and Monitoring

The reference in Section 5.1 **Delivery and Viability** to viability assessment being undertaken in accordance with PPG and GLA and LB Camden policy and guidance is welcomed, as is the specific regard had to London Plan policy regarding review mechanisms (noting the typo that 'review' is missing from before 'mechanisms' in the last sentence of the relevant paragraph). However, as per our Regulation 18 response it is the GLA's preference that the wording is more explicit about the likely requirement for multiple mid stage reviews.

While the updated wording in Section 5.6 **Flexibility** responds to many of the points raised at Regulation 18, the Mayor remains concerned about the reference to a flexible approach to 'taller buildings' and this should be removed. The wording relating to flexibility applies an inappropriate emphasis on building heights being considered through assessment of viability at application stage, whereas the London Plan states that viability testing is to assess the maximum level of affordable housing.

The additional wording relating to what could be material considerations associated with railway infrastructure is sufficient to clearly acknowledge the constraints imposed by the station works and promote this as a factor in deciding planning applications in the area. There is no need to specifically refer to building heights, and doing so creates a lack of clarity and appears as if non-conformity with the LP2021 policy on LVMF is being built into the EAP.

Next Steps

I hope these comments positively inform the preparation of the Euston Area Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Karen Montgomerie at [REDACTED]

Yours sincerely,



Karen Montgomerie

Team Leader Strategic Planning (Local Plans)

Cc: James Small-Edwards, Chair of London Assembly Planning and Regeneration Committee
Anne Clarke, London Assembly Constituency Member
National Planning Casework Unit, MHCLG

Annex 1: Specific suggested edits and comments from TfL on the draft Euston Area Plan update

Document Reference	Track Change comment
General	The proposed bus station is still not included in most of the plans. We would therefore request it is added/ amended where relevant (e.g. where other proposed transport infrastructure is being shown) to show its current proposed location. The document should make clear reference to the need for the station complex to provide an enhanced bus station which will support future demand and help encourage modal shift to sustainable transport modes and the importance of maintaining this transport interchange. Similarly, the phrase 'bus facilities' has been used instead of 'bus station' throughout the document, and we think this should be amended to make it clear we are talking about a bus station (when talking about the proposed linear facility), as is currently provided on the site. Additional bus facilities e.g. new bus stops may be provided in addition to this.
General	With a few exceptions, the drawings are showing e-w and n-s walking connections. The delivery of these connections isn't currently feasible and so it should be made clearer that these are indicative long-term aspirations. The same goes for proposed HS2 station entrances, as some of those shown are aspirational. Reference could be made to safeguarding/ enabling options which would help improve permeability through the site, so that new N-S and E-W pedestrian links can potentially be delivered in the future, even if they are not feasible from day one The proposed Gordon Street LU entrance (as shown in fig 3.5) is also missing in a number of the plans.
General	Each figure used within the EAP should use consistent language. Key suggested changes: • New London Underground Entrances – To be caveated with potential or indicative • Healthy Streets Project Scope - This does not reflect the EHS programme scope, there needs to be rewording (Potential Healthy Streets improvements) or redrafting of the image to include the EHS limits, which can be provided. • The graphics need to be updated to reflect the fact cycle lanes were discounted for Euston Road. • Wording on all graphics needs to be consistent
General	Use of % or per cent needs to be consistent – recommend LBC review and amend.

Document Reference	Track Change comment
General	When referencing ULEZ, it would be good to show the improvement this has made alongside highlighting the ambition to go further.
Throughout	Euston Healthy Streets is referred to as a project. It should be recognised in this document as a programme of works, which has individual projects within it
Throughout	Any reference to a “one-way” linear bus facility should be removed. This hasn’t been decided and it is TfL’s preference that two-way option is selected. Suggest only referencing a “linear” bus station until an option is formally accepted.
Throughout	All timescales that are shown for the delivery of transport projects on the TLRN need to be caveated with indicative – they will be subject to funding decisions and HS2 timescales
Throughout	The tone of wording around the existing bus station should be reviewed. Buses are an important mode of public transport, especially for those on lower incomes and with mobility requirements and need to be planned for accordingly. Euston Road is a strategic east-west traffic connection but is earmarked for numerous conflicting demands on finite space.
P.26 - Figure 2.2 Key issues identified in 2015 EAP	Suggest removing the word intrusive from “Poor public realm at front of station and intrusive bus infrastructure” in the key
P.30	We would recommend the following statement be removed or re-worded, 'The quality and use of Euston Square Gardens is compromised by the current bus station arrangement'. The current station design is a very efficient use of space, which enables convenient bus to bus and bus to other modes interchange, alongside an essential operational function, within the constraints of the surrounding terrain and highway layout.
P.31 - Transport and public realm 5th bullet point	Suggest removing “The existing bus station arrangement provides important interchange facilities but is poorly designed in terms of the wider public realm and movement, creating an unattractive pedestrian and cycle environment.” The bus station provides an important function (as detailed above), and this needs to be retained as part of the redevelopment of the site. There is no road user hierarchy in the MTS, so these modes should all be considered equally.
Safety and security p65	There is currently a focus on strategies which help support ending violence against women and girls, with the government publishing a policy paper on this topic at the end of last year. This is also an area of focus for the Mayor. and we would therefore recommend that specific wording is included around the need to consider/ implement measures specifically targeted around improving the public realm/ walking environment for women and girls.

Document Reference	Track Change comment
	When submitting planning applications which are referred to the mayor, developers will be required to undertake night-time active travel zone assessments as per TfL guidance (night-time-atz-advice-revbapr2025.pdf), and there may be role for women's safety audits, so local residents and other regular users of the space can help identify the current issues they face and what improvements might help resolve them. This requirement could be referenced somewhere in the document.
Strategic Principle EAP 2- p73	The above comments on women's safety would apply, and could be embedded in part B of the policy
P.79 - Strategic Principle EAP 3: Transport	"Providing for the effective and sustainable movement of people, <i>with the vast majority of onward journeys to and from Euston made by walking, cycling and public transport</i> ". It would be good to include a breakdown of this as you have for the journeys originating in Euston. Targets are mentioned but not the current situation.
Fig 3.3 p75	Above comments on the maps apply. As stated elsewhere, implementing walking routes over the station currently isn't currently considered feasible and this should be reflected in the associated wording, acknowledging it remains a long-term aspiration
P.79 EAP3 A	Suggest references to providing e-w links across the station are suitably caveated, given that we know the delivery of these aren't currently feasible. When referencing bus journey times, it might be useful to specifically reference support for suitable bus priority measures being implemented within the EAP boundary. This should be factored into the future design decisions around the bus station to ensure proposals don't have an overall adverse impact on bus journey times.
p.81 EAP3 C	Suggest either here or elsewhere in the policy, a reference is made to the need for future planning applications to be supported by the most relevant, up to date transport modelling, as agreed with TfL/ LB Camden. This will be needed to help inform what, if any transport/ infrastructure improvements may be required to support the delivery of the scheme.
P.80 - last paragraph	Request that wording here is changed - sets an expectation that we are exploring cycle segregation on Euston Road which has been ruled out. The proposals on Hampstead Road are in feasibility and subject to further modelling.
P. 82 - Figure 3.5 Transport Strategy illustrative masterplan	In the key replace 'Indicative locations for bus stops or stands' with 'Indicative location for bus station' and add Buses roundel. The image suggests there isn't a replacement bus station and promotes dispersal of bus services onto Euston Road, which is inconsistent with the public transport improvement objectives alluded to elsewhere in the document and discussions underway regarding a linear facility. As referenced elsewhere, for the avoidance of doubt, we'd suggest all plans should show the proposed bus station in a consistent way

Document Reference	Track Change comment
P81 EAP3 B	Would recommend the following requirement is separated out so the bus requirements are separate to those for pedestrians and cyclists <i>Improvements to bus facilities that meet TfL's operational and passenger requirements.</i> This should also reference the need to maintain bus journey times as part of the future plans for the bus station <i>Improving the environment for pedestrians and cyclists and enhancing the public realm and Euston Square Gardens</i>
P82 Fig 3.5	This map highlights that the e-w walking routes over the station are a long-term aspiration and shows the bus station and proposed tube station entrances in indicative locations. We would recommend that the transport measures are shown in the same way on all relevant maps.
P.83	It should be noted that the Mayor's Transport Strategy does not have a road user hierarchy, with the focus instead being on supporting measures that encourage travel by walking, cycling and public transport. The commitment to enabling the delivery of the objectives of TfL's 'Bus Action Plan' are welcomed, and this should be considered as the designs for the bus station evolve.
P.83	We would suggest the following wording is updated <i>"Euston has a poor road safety record with high rates of collisions resulting in people being killed or seriously injured."</i> We have implemented some highway improvements and there haven't been any fatalities in recent years. Focus should be on delivering improvements in priority locations, as identified in the Transport Study.
P.85	SP – Granby Terrace
P.85	<i>'Improvements to footways around the new underground entrance on Gordon Street (if it is delivered), to accommodate increases in pedestrian numbers'</i> . Improvements will likely be required in this location anyway as this is a pedestrian desire line. The form these improvements take will depend on if/ when the new underground link between Euston and Euston Square LU stations are delivered and as such the wording may benefit from some general wording identifying this as a key pedestrian desire line in need of improvement.
P.86, Paragraph 1	<i>"These crossings should also accommodate cycle crossing movements if these are not catered to within redesigned junctions."</i> Suggest adding the caveat <i>'where possible these crossings will...'</i>
P.87 1 st Bullet	<i>"Upgrading Euston Road, Hampstead Road and Eversholt Street (through the Euston Healthy Streets scheme), to better support cycling, alongside walking and buses, improving road safety and reducing the dominance of general traffic"</i> . Suggest removing the word alongside, as this suggests cycling is the priority whereas on Euston Road cycle provisions have been discounted as other priorities have been identified for this corridor.

Document Reference	Track Change comment
P89/ 90 and p99	It should be ensured that any shared mobility measures e.g. dockless bikes, are provided in locations that won't conflict with pedestrian desire lines given that the very high volume of people expected to be moving through the area in the future. Studies should be undertaken if needed to identify the best location for these.
P.90 - The key transport aspirations for the redeveloped stations	In the 3 rd bullet point replace "To provide a new one-way linear bus facility..." with "To provide a new bus station facility...". It's too early to refer to a one-way linear bus facility while the design hasn't been agreed. Bus stations are more than just stops and stands, they also provide other passenger facilities and information and this will need to be factored into the new bus station designs being developed, We'd also suggest removing "As such, Euston Square Gardens and its character should be retained along with access for all users"
P.92 Bus Facilities	The paragraph headed 'Bus Facilities' needs to acknowledge/reference the bus station. I suggest the following wording; 'upgrade the existing bus station at Euston. It provides an opportunity to establish an improved bus station that meets TfL's passenger and operational requirements.....'
P93 fig 3.11	Existing bus stops are currently missing from the map of public transport connections. The new LU station entrances should be marked as indicative. It might also be beneficial to include the Crossrail 2 safeguarding on this, or another map so it is clear what land is in question when we reference safeguarding.
P.94 - Bus facilities	Heading 'Key requirements of the bus facilities include' - suggest rewording to 'Key requirements of the replacement bus station include:' 1st bullet point - 'Providing sufficient stop and stand space to accommodate an agreed level of bus operational requirements, including driver welfare facilities.' - suggest rewording to 'Providing sufficient space to meet TfL's passenger and operational requirements, including driver welfare facilities.' 1st bullet point- suggest removing "Any bus standing facilities will need to be demonstrated as being operationally essential, (given the existing space constraints on the delivery of this major multi-modal transport hub), and locations within the station site should be prioritised' as all bus standing requirements are identified on the basis of supporting the efficient operation of the bus network, Suggest replacing "It is acknowledged that some bus stops may need to be located on Euston Road" with "It is acknowledged that some bus stops may need to be located on highway" 3rd bullet point, suggest removing "...and cyclists,..." from the first sentence. Cycle movements should be segregated from the bus facilities within the bus station for safety reasons. 6th bullet point, replace "... and should minimise impact on the wider transport network..." with "... and should enhance/optimize the wider transport network..."

Document Reference	Track Change comment
P.95 - Bus facilities	Last paragraph, replace “It is expected that the new bus station would have a linear format and that it would be located off highway at the front of the station along the northern edge of Euston Square Gardens.” with “It is expected that the new bus station would be located off highway at the front of the station along the northern edge of Euston Square Gardens.” and remove “Camden’s aspiration is for this facility to be one-way but the exact layout will be determined in future design stages.” We’d also suggest that both here and throughout the document we reference a ‘replacement bus station’ rather than a ‘new facility’ given the existence of an existing bus station on site and the fact that we need to replace with a new, fit for purpose facility, rather than deliver something that doesn’t currently exist.
P.119 - Paragraph 7	“The existing bus station arrangement at the front of the station is dated, impermeable and whilst it works well operationally and as an interchange it provides a poor setting for the station and gardens in design terms.” Wording should be revised as without the interim taxi-rank, the bus station has through routes and is offering a valuable service to both commuters and local residents
P.121 Fig 4.2	Transport infrastructure should be shown consistently on the plans. This is missing the proposed LU entrance on Gordon Street and the indicative bus station etc. E-W walking routes should be shown as a long-term aspiration as referenced elsewhere.
P.125 Functionality para 5	‘Interchange with buses and taxis....., not necessarily confined to a single location’. It’s not clear what that means, so could potentially be re-worded to make the emphasis clearer.
P.132 - Bus facilities	Overall it should be clear in this section that the scale of the bus station needs to provide sufficient space to meet TfL’s passenger and operational requirements as mentioned elsewhere in the document. Some specific suggestions include: * 2nd bullet point, remove ‘one-way’ from ‘Providing a one-way linear arrangement’ (as per previous comments)’and reduced barriers (to the current bus facility’) also needs to be removed. * 3rd bullet point, suggest removing ‘to be of similar scale to the surrounding street network, and’ * Remove 4th bullet point, 7th bullet point captures the need to provide ped crossings that meet desire lines * 5th bullet point buses should be the priority in this ‘Gateway’ station location.. The terms stops and stands are being used interchangeably, so it should be made clear what is being referenced given they serve different functions and have different requirements,
P.132 - Bus facilities	8th bullet point, remove ‘and removing bus movements from within the open space’. There is existing bus infrastructure in the space and this will likely need to continue.

Document Reference	Track Change comment
P.132	As per comments above, it is too early to commit to a linear bus station layout. The plans for the bus station are still at the feasibility stage and subject to change. Safety will be a primary concern when designing the future bus facility, however there are limited places the bus station can go and so ensuring an effective design will be paramount. Buses are a key mover of people in the area, and it will be important that suitable design solution can be found, whilst acknowledging there is also an aspiration to improve the public realm. We would however recommend the word 'balance' is removed given the importance of delivering an essential and functioning bus station in this constrained location.
P.142 'infrastructure requirements'	Is it worth explicitly referencing the transport infrastructure requirements in this section and what transport improvements contributions might be required towards. Infrastructure requirements under this location include the need for a replacement bus station and new LU station entrance.
P.145 4.2 Euston Road	Para 2- needs to mention the inner-ring road and function as a strategic freight corridor. Para 5- this is a repeat of Paragraph 7 on P.119 - suggest removing or re-wording
P.146 – EAP 2	Para B- there should be an acknowledgement that if there are to be new bus stops introduced on Euston Road this will potentially limit what can be done with the space and may influence what other improvements can be delivered in the nearby vicinity, as the focus will be on ensuring there is adequate waiting space for bus passengers etc. Also, stops on Euston Road suggests dispersal of services and could not reasonably be considered to be part of the bus station.
P.147 fig 4.3	As above, new LU station entrance locations should be marked as indicative.
P.148 - Active frontages	Elaborate on what negative frontages would comprise of.
P.150 - Improved bus facilities	2nd paragraph under 'Improved bus facilities', suggest removing 'ensuring that they do not impede impact on the safety of pedestrians and cyclists' as this will be integral to the design process anyway.'bus facilities to be delivered to complement pedestrian and cyclist improvements'.....needs rewording as currently suggests buses are 3rd priority?!
P.149 - Paragraph 1	"Enhance and enlarged pavement space" - this needs to be caveated with where possible Bullet 4- Importance of sub surface link needs to be expanded on. It allows more to be done at a surface level if pedestrian movements can be shifted.

Document Reference	Track Change comment
	Cycle infrastructure on Euston Road is not being considered and has been discounted. This needs to be reworded to focus only on the alternative routes that already exist in the area Improved cycle routes, Bullet 3- need to be caveated with where possible, will be explored.
P.150 - Sustainable future of Euston Road.	Suggest removing “as part of the Euston Healthy Streets Project” as improvements may not just be delivered through EHS. Suggested alternative, Camden will work with TfL to ...
Transport Corridor Role – Paragraph 2	There is still no recognition for the strategic role of the Inner Ring Road - it is important that this is stressed.
P.182 EAP4	As referenced above, Euston Healthy Streets is a programme of works, not a project.
P.183 Fig 4.5	Review labelling of map as it is not consistent throughout e.g. indicative new LU station entrance not shown on key
P.186 - Enhance Hampstead Road Public Realm	“Hampstead Road is a key cycle route and cycle lanes should be introduced to link with the wider network of cycle lanes across central London.” All proposals are still in feasibility and will be subject to modelling outputs
P.187 - Greening of Hampstead Road	Change “will be implemented” to “will be considered”
P.244 - Appendix 2	Any timescales should be caveated with indicative until a clearer understanding of HS2 is delivered.
P.248 Project List	Enhanced and new bus facilities – suggest re-wording to Enhanced replacement bus station.
P.250 - Row 4 Row 7	Missing word - “Gordon Street” Suggest rewording to ‘Enhanced replacement bus station’
P.252 - Row 3	Suggest “Healthy Streets Crossing Improvements” to replace the project name.