

Statement of Common Ground between the London Borough of Camden and the Mayor of London and Transport for London

October 2026



1. Introduction

- 1.1 This document is the Statement of Common Ground (SoCG) between the London Borough of Camden and the Mayor of London and sets out the parties' agreed positions in relation to relevant strategic matters identified and as set out in the Mayor's Regulation 19 representation on the Euston Area Plan Update Proposed Submission Draft.
- 1.2 It has been prepared to demonstrate that the Euston Area Plan (EAP) Update Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' in accordance with Paragraph 36 of the National Planning Framework (NPPF) throughout the plan preparation period and will inform further engagement to ensure effective implementation of EAP policies.
- 1.3 It focusses on the matters raised by the GLA and Transport for London (TfL) in their joint response to consultation on the EAP Update Proposed Submission Draft. It highlights matters where agreement has been reached between the Council and the GLA, and areas where agreement has not yet been reached.
- 1.4 In the spirit of collaboration, the document has been prepared as a 'live' document, that can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating. This should be read in conjunction with the Statement of Common Ground between Camden and the Mayor of London prepared for the Camden Local Plan signed November 2025.
- 1.5 The EAP is being updated to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities, including ensuring that the EAP is consistent with the updated Local Plan and the latest Government position on the construction of HS2 at Euston.
- 1.6 Following informal consultation and engagement, proposed updates to the EAP were published for consultation January 2023. An additional consultation was held in Summer 2024. It aimed to provide a 'direction of travel' update in response to the changes and uncertainty following the Government's announcements regarding HS2 and Euston.
- 1.7 The Council is also in the process of updating the Local Plan. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this. The Camden Local Plan Proposed Submission Draft was submitted to the Secretary of State for independent examination on Friday 3 October 2025, with examination hearings taking place in May and June 2026.

- 1.8 The Greater London Authority (GLA) on behalf of the Mayor of London provided a response to the Proposed Submission Euston Area Plan Update on 3 March 2026, this included comments from TfL.

2. Duty to co-operate

- 2.1 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. Officers have met regularly during development of the draft EAP and these discussions have positively informed the Regulation 19 plan.

3. Key Strategic Matters

- 3.1 In London, planning and co-operation on strategic matters are generally covered by the London Plan, with more locally specific matters covered in local plans.
- 3.2 The Mayor of London is responsible for producing the London Plan, which sets out the strategic vision for the development of London over the next 20-25 years. This includes policies on the provision of housing, the management of waste, protection of the environment, and promotion of economic development. The London Plan sets out the Mayor's strategic approach to transport and also includes a number of more detailed transport policies.
- 3.3 The Mayor of London is also responsible for producing a London wide Transport Strategy. Transport for London (TfL) is the transport operator and highway authority for the whole of London and is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy.
- 3.4 The [Statement of Common Ground](#) (SoCG) prepared for Camden's Local Plan sets out the main strategic issues that the authorities have collaborated on and these are:
- Euston Opportunity Area
 - Housing Targets
 - Affordable Housing
 - Gypsy and Traveller accommodation
 - Tall Buildings
 - Industrial Land

Euston specific aspects (including transport) are set out below:

4. Matters where the parties agree

- 4.1 Both parties agree that the Regulation 19 Euston Area Plan is in general conformity with the London Plan and that strategic matters have been dealt with appropriately.

- 4.2 Officers from TfL and the London Borough of Camden have worked closely throughout the production of the EAP Update. The Transport Study which provides a transport evidence base and identifies key infrastructure requirements for the Euston Area Plan (EAP) Update was produced by TfL with support from officers at the London Borough of Camden.
- 4.3 Euston Healthy Streets is a joint workstream to identify options to improve the safety and attractiveness of the Euston area for all road users, but especially pedestrians, cyclists and bus passengers. The programme is reviewing the streets surrounding Euston Station (Euston Road, Hampstead Road and Eversholt Street) and identifying and delivering schemes that respond to current and future travel demands resulting from Euston's regeneration.
- 4.4 The below table details the matters raised by the GLA/ TfL on behalf of the Mayor of London as representations to the Euston Area Plan Update Proposed Submission Draft (Regulation 19), and the status of those representations.
- 4.5 The table demonstrates that the Mayor is supportive of the vision and objectives set out in the EAP Update and that the draft is considered to be in general conformity with the London Plan. Appendix A details further comments provided by the Mayor and the Council's response indicating that issues are mainly resolved. The detailed table of comments in appendix A represents the current agreed position in respect of the agreements and differences between London Borough of Camden and the Mayor on non-strategic transport issues.

Table of GLA representations and LB Camden response

Topic	GLA comment	LBC response	Common Ground Agreed?
Vision	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	Support welcomed.	Agreed. As currently drafted it is the mayor’s opinion that the Regulation 19 Euston Area Plan has been positively informed by regular discussions and that it is in general conformity with the London Plan.

	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.		
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).	Support welcomed.	Agreed - vision aligns with the vision for Euston set out in LP2021 Policy SD1 and is supported by the Mayor.

Land Use 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.	Support welcomed.	Agreed. Proposed submission draft reflects previous comments from GLA.
Homes	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.	Support welcomed.	Agreed. Proposed submission draft reflects previous comments from GLA.

Economy & employment	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.	Support welcomed.	Agreed. Proposed submission draft reflects previous comments from GLA.
Retail, leisure & culture	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.	Support welcomed.	Agreed. Proposed submission draft reflects previous comments from GLA.
Design	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.	Support welcomed.	Agreed. Proposed submission draft reflects previous comments from GLA.

	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 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.		
Transport	Local authority policy documents should be	Support welcomed. Response to	Agreed. Subject to

	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.	comments provided in annex 1 provided in appendix 1.	response to detailed comments below.
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.	Support welcomed.	Agreed. Proposed submission draft reflects previous comments from GLA.
Delivery & viability	The reference in Section 5.1 Delivery and Viability to viability assessment being undertaken in accordance with PPG and GLA	Agree to suggest proposed wording as proposed modification to section 5.1 to avoid possible confusion when reading	Agreed, subject to proposed modification.

	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	across the documents. “...Where appropriate, and having regard to London Plan policy, reviews will be expected as a minimum at early, mid, and late stages in the development process to ensure that public benefits are maximised as a result of any future improvement in viability. Mechanisms will be secured through a s106 Agreement and should be assessed at the various stages of development (i.e. early, mid and late stages) in order to allow for increases in contributions, to ensure that public benefits are maximised as a result of any future improvement in viability.” Support noted and agree to suggest proposed deletion as proposed modification to section 5.5 – further proposed modifications also included for clarity and in response to other consultation responses as follows: “The range of floorspace included in the EAP is considered to be appropriate representing the capacity capable of being supported in the Euston area – able to meet both wider planning requirements and the Plan policies and objectives. Should new opportunities for development be identified through design	
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	of clarity and appears as if non-conformity with the LP2021 policy on LVMF is being built into the EAP.	refinement it may be possible to deliver in excess of the ranges identified. It is recognised that with the significant and unusual costs involved in development connected to the station and above tracks, development viability will be a considerable challenge. In considering proposals for redeveloping the station and tracks area in particular, the priority will be to ensure a development of high quality and excellently designed masterplan alongside any new station(s), and if additional development or taller buildings are necessary to facilitate this, some flexibility towards other requirements in this plan may be considered with reference to London and Local Plan policy, in order to ensure that development is deliverable and public benefits are maximised optimised.”	
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Signatures

1. Both parties agree that this Statement is an accurate representation of matters discussed and issues agreed upon. We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between the London Borough of Camden and the Greater London Authority and Transport for London. The authorities will continue to work collaboratively to address cross-boundary issues and to meet the duty to cooperate.

LONDON BOROUGH OF CAMDEN

Name: Mary-Ann Lewis

Position: Director of Euston Regeneration

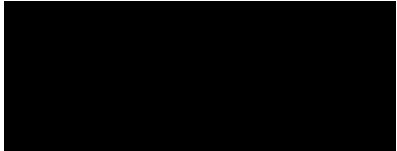
Signature: 

Date: 8th October 2026

GREATER LONDON AUTHORITY and TRANSPORT FOR LONDON

Name: Lucinda Turner

Position: Assistant Director of Planning and Regeneration (GLA) / Director of Spatial Planning (TfL)

Signature: 

Date: 08/10/2026

Appendix A:

The below table provides detailed comments suggested by TfL in order to provide clarity to the EAP Update - raised by the GLA on behalf of the Mayor of London as representations to the Euston Area Plan Update Proposed Submission Draft (Regulation 19), and the status of those representations.

- The table seeks to provide clarification and clarity to the extent to which matters raised by the Mayor are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between London Borough of Camden and the Mayor.
- Response to TfL's detailed comments provided as an annex to the Mayor of London's response to the Regulation 19 consultation on the Proposed Submission draft of the EAP.
- *Where modifications are proposed, these fall within the scope of para.1.5 of the PINS Guidance and are not being submitted as part of the Submission Plan for examination. They are modifications which have been negotiated to narrow issues and which the Council is content to make subject to the Inspector concluding that they are necessary for soundness and should form Main Modifications to be consulted on in due course.*

Topic	TfL comment	LBC response	Agreed?
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	It is not intended to show everything on all plans or they would become too crowded. No change – bus facilities covers all options, including a bus station. No change. Noted that TfL would prefer alternative wording.	Proposed modifications noted by TfL who retain preference for updates and wording as originally set out as there is a need to distinguish between on and off-street bus facilities.

Topic	TfL comment	LBC response	Agreed?
	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.	All of the masterplans and strategies are illustrative and are described as such. Pg.85 of the EAP includes the following wording (proposed addition in bold): <i>There may be design limitations in Euston Station which result in fewer over-station routes being delivered. However, delivery of these routes remains an EAP aspiration and it is expected that if not feasible, equivalent alternative connections would be sought that are as direct as possible. Where feasible, safeguarding for the future delivery of identified routes should be provided. The connection between Robert Street and Phoenix Road is considered for routes above the station. This should be delivered alongside the long-term development opportunity of the Network Rail parcel deck.</i>	Proposed modification noted and supported by TfL. TfL retain preference for Gordon St entrance to be shown on all plans showing the indicative future transport network for the area.

Topic	TfL comment	LBC response	Agreed?
		It is not intended to show everything on all plans or they would become too crowded.	
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	All masterplans are labelled as indicative so it is not felt necessary to provide a double caveat. Propose to add (indicative location) after 'new London Underground entrances in the key to fig 3.11 on pg.93 LBC still have aspiration for Euston Road cycling – retain wording. Remove program and replace with 'Healthy Streets in Euston'	Proposed modifications noted by TfL, who maintain that they do not consider the delivery of cycle lanes on Euston Road as a priority given the current role of the TLRN in this location and other competing demands for space. If references to cycle lanes are to be retained it needs to be made clear these are a Camden aspiration only and not a commitment
General	Use of % or per cent needs to be consistent – recommend LBC review and amend.	Propose modification to replace percent with % on pg.32	Proposed modifications noted by TfL
General	When referencing ULEZ, it would be good to show the improvement this has made alongside highlighting the ambition to go further.	Insert text under 3.5 Environment Strategy, page 103 after the penultimate paragraph <i>The 2023 ULEZ expansion has reduced the number of polluting</i>	Proposed modifications supported by TfL

Topic	TfL comment	LBC response	Agreed?
		<i>vehicles and subsequently the levels of harmful air pollution that Londoners are exposed to. This is complemented by Camden's Safe and Healthy Streets schemes that aim to reduce carbon emissions from vehicles and improve air quality in Camden.</i>	
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 – replace ' Euston Healthy Streets project ' with ' Healthy Streets in Euston ' - first referenced on page 80 (includes Euston Road, Hampstead Road and Eversholt Street) and as glossary item on 266	Proposed modifications noted by TfL, preference to change to 'Euston Healthy Streets Programme'
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.	Disagree, LBC support 'one-way', have responded to specific references later in table.	Proposed modifications noted by TfL, whose position remains that until a formal position has been reached on the future layout of the bus station, that the document should keep options open and only refer to a 'linear' bus station.
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	Future proposals are shown as indicative. This is covered in the text, no change considered necessary.	Proposed modifications noted by TfL.

Topic	TfL comment	LBC response	Agreed?
	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.	Agree that buses are an important mode of public transport. The EAP seeks to provide both a quality bus interchange and a quality public realm that people can navigate easily. The proposals for Euston Road are aspirational and we are keen to achieve the strategic objective for the road.	Comments noted. TfL's previous comments on recognising the importance of buses remain.
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	The key issues should reference the challenges with the existing bus station, alternative wording as follows: <i>Poor public realm at front of station, with bus station making it difficult for people to easily navigate the space.</i>	Proposed modifications noted by TfL.
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.	No change suggested. Both statements are considered accurate and future designs should seek to address both points.	Proposed modifications noted by TfL. TfL's previous comments around ensuring a suitably designed bus station can be delivered in this location still apply.
P.31 - Transport and public realm	Suggest removing "The existing bus station arrangement provides important interchange	No change suggested, as above, both statements can be true and	Proposed modifications noted

Topic	TfL comment	LBC response	Agreed?
5th bullet point	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.	future designs should seek to address both points.	by TfL. TfL’s previous comments around ensuring a suitably designed bus station can be delivered in this location still apply.
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.	Policy T1: Safe, Healthy and Sustainable Transport, of the Camden Local Plan specifically refers to women and girls in the design the public realm, not considered necessary to repeat – reference added to strategic principle below.	Proposed modifications noted by TfL.
Strategic Principle EAP 2- p73	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.	Propose update to following bullet: Providing uses that create interest and activity along key streets to enliven streetscapes and make them attractive and safe routes, it will be especially important to demonstrate how consideration for the needs and safety of vulnerable people are assured, including completing safety audits.	Proposed modifications noted and supported by TfL.

Topic	TfL comment	LBC response	Agreed?
	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, with the vast majority of onward journeys to and from Euston made by walking, cycling and public transport”. 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.	The Transport Study which supports the EAP, includes a vast amount of information about the current position.	Proposed modifications noted. TfL think that it would be beneficial to include key supporting information in the main document where feasible
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	See comments above	Proposed modifications noted and supported by TfL.
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	See comments above. Numerous references are made to TfL's operational requirements and as mentioned elsewhere it will be important to ensure there is an appropriate balance between competing uses. Detail about bus priority measures are provided on pg. 95	Proposed modifications noted by TfL.

Topic	TfL comment	LBC response	Agreed?
	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.	Proposed modification in bold. C: Where appropriate, developments will be required to contribute towards the measures set out above, in addition to those provided by HS2. In line with Local Plan policy, major applications should be accompanied by a detailed Transport Assessment, supported by the relevant, up to date transport modelling. In line with draft Local Plan policies, development will also be expected to be car-free although it may still generate some demand from private vehicles, including from visitors and freight.	Proposed modifications noted and supported by TfL.
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.	Text is not definitive. Proposed mods in bold and crossed out text to make clearer that all subject to impacts on TLRN/ modelling. Upgrading Euston Road, Hampstead Road and Eversholt Street. Subject to modelling impacts on the TLRN/ road network being assessed , this includes creating safer pedestrian routes, more accessible bus connections and improved cycle connectivity, with consideration for physical segregation where possible. There may also be measures to reduce through traffic on Eversholt Street (subject to the impacts	Proposed modifications noted by TfL. As above, TfL's view remains that it should be made clear that it's a Camden aspiration to have cycle lanes on Euston Road and not something that is currently considered feasible given the competing demands for road space.

Topic	TfL comment	LBC response	Agreed?
		on the TLRN being assessed). Most of these changes will be delivered through the joint TfL and Camden Euston Healthy Streets programme project.	
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	See comments above	TfL think the bus station should be shown consistently on all plans, with a bus roundel showing the indicative location. This is to differentiate this from other bus infrastructure (i.e. stops and stands) which might be required on street following the redesign of the proposed HS2 station
P81 EAP3 B	Would recommend the following requirement is separated out so the bus requirements are separate to those for pedestrians and cyclists Improvements to bus facilities that meet TfL's operational and passenger requirements. This should also reference the need to maintain bus journey times as part of the future plans for the bus station Improving the environment for pedestrians and cyclists and enhancing the public realm and	No change – see comments above Bus journey times are part of TfL's operational requirements and this is also explicitly referenced elsewhere Not sure what final sentence is referring to/ asking for?	Proposed modifications noted by TfL.

Topic	TfL comment	LBC response	Agreed?
	Euston Square Gardens		
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.	Add note to figure 4.2 Euston Station illustrative masterplan (and all relevant plans) to show that routes over the station are long-term aspirational routes	Proposed modifications noted and supported by TfL. TfL think that the transport infrastructure should be shown in this way on all relevant maps as this shows the most accurate view of the aspirational future transport network
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.	LBC has drafted the plan to ensure that the road user hierarchy from the Camden Transport Strategy is reflected in the EAP. This prioritises pedestrians then cyclists, above other road users, this is the same hierarchy as Manual for Streets and the Highway Code. Pedestrians, followed by cyclists, are the most vulnerable road users, therefore their safety travelling to and from Euston Station, should be considered when designing transport interchanges, like the bus facilities at Euston Station.	Proposed modifications noted by TfL.
P.83	We would suggest the following wording is updated "Euston has a poor road safety record with high rates of collisions resulting in	Alternative wording as follows: <i>All new highways proposals should</i>	Proposed modifications noted by TfL.

Topic	TfL comment	LBC response	Agreed?
	people being killed or seriously injured.” 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.	<i>have regard to the above policy and aim to deliver safer streets for all road users. There have been several collisions in the Euston area in the past resulting in people being killed or seriously injured. New measures should have regard to actions previously set out in Camden’s Road Safety Action Plan in particular and reach the goal of zero deaths and serious injuries by 2041 as outlined in the Mayor’s Transport Strategy.</i>	Proposed modifications noted and supported by TfL.
P.85	SP – Granby Terrance	Update – spelling mistake	Proposed modifications noted by TfL.
P.85	‘Improvements to public realm on Gordon Street to account for this key desire line, needed with or without the new underground entrance to accommodate increases in pedestrian numbers’. 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.	Proposed modification: Improvements to public realm and footways around new underground entrance on Gordon Street to account for this key desire line, needed with or without the new underground entrance to accommodate increases in pedestrian numbers’	Proposed modifications noted and supported by TfL

Topic	TfL comment	LBC response	Agreed?
P.86, Paragraph 1	“These crossings should also accommodate cycle crossing movements if these are not catered to within redesigned junctions.” Suggest adding the caveat ‘where possible these crossings will...’	Agree to proposed change	Proposed modifications noted and supported by TfL.
P.87 1st Bullet	“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”. 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.	...walking and cycling, alongside bus movement...’ change order of wording but retain hierarchy. Remains aspiration for Camden and EAP is to 2051.	Proposed modifications noted by TfL. As highlighted elsewhere, TfL’s position remains that the delivery of cycle infrastructure is not considered a priority for Euston Road itself, with alternative routes available
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.	New dockless hire bike bays that are delivered by the Camden Transport Team, are installed in locations that have been assessed to ensure all road users are able to safely travel. Proposed addition to first para on pg.90: Shared facilities, such as Santander bikes, and dockless e-scooters and hire bikes could be integrated alongside shared cargo bikes and car clubs to create mobility hubs which would build on the existing network of mobility	Proposed modifications noted and supported by TfL

Topic	TfL comment	LBC response	Agreed?
		hubs in the Euston Area. They should be installed in locations with sufficient width and adjacent to pedestrian desire lines, to minimise any impacts on pedestrian comfort, amenity, and safety.	
P.90 - The key transport aspirations for the redeveloped stations	In the 3rd 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”	Do not support change as one-way linear facility is preference. It is not currently demonstrated to be undeliverable therefore we would like to retain as the council’s preference. Reference to Euston Square is important – it is a historic London Sq.	Proposed modifications noted by TfL Comments as above re linear bus station
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.....’	No change	Noted by TfL
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	Including all existing stops could make diagram too crowded.	Noted. TfL recommend stating that the bus stop locations shown are indicative only. Given

Topic	TfL comment	LBC response	Agreed?
	include the Crossrail 2 safeguarding on this, or another map so it is clear what land is in question when we reference safeguarding.		there will likely need to be new bus stops on Euston Road, it might be useful to highlight what is proposed vs. existing infrastructure.
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	As above – no change Agree change: Providing sufficient space to meet TfL's passenger and operational requirements, including driver welfare facilities. No change Agree to change on second point (highway). Retain as important for cyclists to be considered in the design Agree – replace "... and should minimise impact on the wider transport network..." with "... and should enhance/optimize the wider transport network..."	Proposed modifications noted by TfL and agree that pedestrian movement will be an important consideration as designs develop. TfL do however still think that cyclists will need to be segregated from the bus station space for safety reasons, which will be a primary concern for any designs.

Topic	TfL comment	LBC response	Agreed?
	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/optimise the wider transport network...”		
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	Above – station vs facilities Suggest this stays as is –clearly stated as aspiration. Retain facility as this covers all eventualities including a more traditional bus station. LBC would like to ensure that the road user hierarchy from the Camden Transport Strategy is reflected in the EAP. This prioritises pedestrians then cyclists, above other road users, this is the same hierarchy as Manual for	Proposed modifications noted by TfL. Comments as above - TfL still think the document should clearly reference a bus station rather than bus facilities to identify this as a distinct thing that needs to be delivered, alongside on-street stops and stands

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	‘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.	Streets and the Highway Code. Pedestrians, followed by cyclists, are the most vulnerable road users, therefore their safety travelling and to and from Euston Station, should be considered when designing transport interchanges, like the bus facilities at Euston Station.	
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	Challenges are long-standing and identified in 2015 EAP – long before temp taxi rank. No change proposed.	Proposed modifications noted by TfL.
P.121Fig 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.	As above. The illustrative masterplans are all intended to show different details and it is not considered necessary to show all the detail on all of the plans.	Proposed modifications noted by TfL, who maintain there needs to be consistency in how the proposed transport improvements are shown across the different plans.
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	“Interchange with buses and taxis needs to be clear and obvious, not necessarily confined to a single	Proposed modifications noted and supported by

Topic	TfL comment	LBC response	Agreed?
	potentially be re-worded to make the emphasis clearer.	location"	TfL.
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,	Proposed modification: • Designing for cycle safety and movement so that any bus movements into and out of a bus facility (including bus stops and stands on the public highway) do not impede cycle movement	Proposed modifications noted by TfL. As previously stated, it will be important that a suitably sized bus station that meets TfL requirements can be delivered in this location
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.	No change, aspiration is to remove and is an important part of the open space strategy.	TfL would welcome flexibility in the wording given the ongoing discussions in relation to this.

Topic	TfL comment	LBC response	Agreed?
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.	As above – no change Wording reflects that this is the current design option.	Proposed modifications noted by TfL. TfL comments re linear bus station as above
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.	Add to SA1, infrastructure requirements: In addition to the delivery of the main station interchange, the site will be expected to accommodate and contribute/ facilitate the delivery of infrastructure, including: Cycle facilities, highway improvements including new pedestrian crossings, public realm enhancements, improved bus and taxi facilities, new routes, open space and the provision of, or contributions towards, appropriate	Proposed modifications noted and supported by TfL.

Topic	TfL comment	LBC response	Agreed?
		social infrastructure.	
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	Add reference to freight to following wording: It is a busy east-west transport route for pedestrians and vehicles (part of the TLRN, and forms the boundary of the congestion charge zone and functions as a strategic freight corridor) and connects the King's Cross area (to the east), residential communities to the north, Bloomsbury (to the south), Regent's Park (to the west) and Fitzrovia and the West End (to the south west).	Proposed modifications noted and supported by TfL.
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.	Proposed addition in bold below Sustainable future of Euston Road: Camden will work with TfL to prioritise sustainable modes over private motor vehicles on Euston Road as part of the Euston Healthy Streets project. Where appropriate, road space will be reallocated to provide additional facilities for pedestrians, cyclists and public transport users. It will be important to consider all modes holistically. Given the limited space available, improved bus facilities should be designed with passenger comfort and safety, while travelling to and from the bus facilities, and when boarding and alighting buses.	Proposed modifications noted and supported by TfL.

Topic	TfL comment	LBC response	Agreed?
P.147 fig 4.3	As above, new LU station entrance locations should be marked as indicative.	As above.	As above re plans
P.148 - Active frontages	Elaborate on what negative frontages would comprise of.	No change considered necessary.	Proposed modifications noted by TfL.
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?!	LBC would like to ensure that the road user hierarchy from the Camden Transport Strategy is reflected in the EAP. This prioritises pedestrians then cyclists, above other road users, this is the same hierarchy as Manual for Streets and the Highway Code. Pedestrians, followed by cyclists, are the most vulnerable road users, therefore their safety travelling to and from Euston Station, should be considered when designing transport interchanges, like the bus facilities at Euston Station.	Proposed modifications noted by TfL. As stated elsewhere, when designing the bus station, ensuring it is safe for all users of the space will be the 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.	No change - 'where feasible' etc. No change – includes ref to 'where it allows' Proposed addition: Proposals for a new sub-surface crossing linking Euston Station with Euston Square Station should be fully explored to help meet additional passenger demand,	Proposed modifications noted and supported by TfL.

Topic	TfL comment	LBC response	Agreed?
		providing a direct interchange between train and tube lines and to help ease the pressure on above ground crossings, helping to improve road safety.	
	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.	No change - Remains an aspiration	Proposed modifications noted by TfL. Previous comments regarding cycling on Euston Road apply as this is not something we currently think is feasible
P.150 - Sustainable future of Euston Road. Transport Corridor Role – Paragraph 2	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 ... There is still no recognition for the strategic role of the Inner Ring Road - it is important that this is stressed.	Sustainable future of Euston Road: Camden will work with TfL and other delivery partners to prioritise sustainable modes over private motor vehicles on Euston Road as part of the Euston Healthy Streets at Euston. project. Where appropriate, road space will be reallocated to provide additional facilities for pedestrians, cyclists and public transport users. Reference is made in context section – no change considered necessary.	Proposed modifications noted by TfL.
P.182 EAP4	As referenced above, Euston Healthy Streets is a programme of works, not a project.	Hampstead Road will be transformed to provide a more pleasant and accessible	Proposed modifications noted

Topic	TfL comment	LBC response	Agreed?
		street environment drawing on Healthy Streets design principles .	by TfL.
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	Proposed modification to add indicative location for TfL entrance to key	Proposed modifications noted and supported by TfL.
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	Add additional wording “...across central London, subject to feasibility ”	Proposed modifications noted and supported by TfL.
P.187 - Greening of Hampstead Road	Change “will be implemented” to “will be considered”	Change “will be implemented” to “will be considered ”	Proposed modifications noted and supported by TfL.
P.244 - Appendix 2	Any timescales should be caveated with indicative until a clearer understanding of HS2 is delivered.	No change needed – introductory ex to table covers this.	Proposed modifications noted by TfL.
P.248 Project List	Enhanced and new bus facilities – suggest re-wording to Enhanced replacement bus station.	No change- as above	Proposed modifications noted by TfL.
P.250 - Row 4 Row 7	Missing word - “Gordon Street” Suggest rewording to ‘Enhanced replacement bus station’	No change- as above	Proposed modifications noted by TfL.
P.252 - Row 3	Suggest “Healthy Streets Crossing Improvements” to replace the project name.	Proposed mod: New/improved crossings on Hampstead Road Notes: as part of wider Healthy Streets programme	Proposed modifications noted and supported by TfL. .

