

SD22

**Statement of Common Ground
between the London Borough of
Camden and HS2 Ltd.**

**concerning the Camden EAP
Update Proposed Submission
Draft**

October 2026

1. Introduction

- 1.1 This document is a Statement of Common Ground between the London Borough of Camden and HS2 Ltd. It concerns comments raised in relation to the Euston Area Plan (EAP) Update Proposed Submission Draft at the Regulation 19 consultation stage.
- 1.2 This Statement of Common Ground has been prepared to demonstrate that the matters raised by HS2 Ltd. in their representations on the Euston Area Plan Update Proposed Submission Draft (Regulation 19) have been resolved (subject to proposed modifications set out later in this statement). In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues.

Background

- 1.3 The EAP is being updated to ensure that the evidence base for parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities for development within the Euston Area, including ensuring that the EAP is consistent with the updated Local Plan. Following informal consultation and engagement, proposed updates to the EAP were published for consultation in January 2023. An additional consultation was held in Summer 2024. Regulation 19 consultation was held January - March 2026.
- 1.4 HS2 Ltd. provided a response to the Euston Area Plan Update Proposed Submission Draft on 3 March 2026 seeking modifications to the Open Space section of the EAP update.

Joint working

- 1.5 Work is ongoing to improve integration at Euston between the construction of the HS2 central London terminus and improved onward connections, Network Rail's redevelopment of the mainline station; the redevelopment of the London Underground station and the wider development of the urban environment managed by the Master Development Partner, Lendlease.
- 1.6 A new governance structure has been created with the establishment of the Euston Delivery Company ('EDC') and there has, and continues to be, attendance by all delivery organisations along with Camden, TfL and GLA at a governance board where the EAP update has been discussed at key moments in the update process. The attendance of Network Rail, HS2, TfL and the Department for Transport (DfT) at various governance and officer boards has also allowed regular input from strategic transport providers, including HS2 Ltd. Camden have also met with the delivery organisations to understand constraints and opportunities (including where land may be enabled) to feed into the EAP update.

2. Interested parties

- 2.1 The parties to this SoCG are the London Borough of Camden and HS2 Ltd.

London Borough of Camden

- 2.2 Euston is located in the south of Camden, a diverse inner London Borough with a population of approximately 215,000. It is identified as an Opportunity Area (OA) in the London Plan with potential for large scale development, providing substantial new jobs and homes. In 2021 there were 13,306 people estimated to be living in the EAP area, approximately 6% of the population of the borough. The EAP boundary area has a slightly younger population than Camden as a whole, which itself has a relatively young age profile compared to the national average. The area is home to a diverse population with a comparatively high proportion of residents from Black and Minority Ethnic groups 58% compared to a borough average of 40.5%. The southern part of the Plan area forms part of the Central Activities Zone (CAZ), taking in part of Bloomsbury which neighbour the West End and City of London.



HS2 Ltd.

- 2.3 HS2 Ltd. is the Government's nominated undertaker, responsible for the delivery of the section of the HS2 route from Old Oak Common to the boundary with the HS2 Euston station at Hampstead Road Bridge, including the Euston Approaches. It also continues to be responsible for enabling works for the future Euston HS2 station, playing a key role in working with the EDC to develop the design of the HS2 station, and therefore the regeneration of the wider area. From 1 April 2026, EDC assumed the role of programme integrator and campus-wide directing mind for the Euston programme, with HS2 Ltd. continuing to support EDC while retaining its responsibilities as nominated undertaker. HS2 Ltd. have been consulted as part of the EAP Update preparation, and engagement has continued between formal consultation stages.

Euston Station

- 2.4 At the time of writing, there are no confirmed Euston station designs or costs. There is a commitment to joint working by the delivery organisations to try to achieve the best integrated campus solution for Euston across the whole Euston Station campus. As the designs for the stations progress, further detailed work to understand technical and cost implications of station designs and associated transport infrastructure will be required to fully understand what station, development, public realm and open space will be delivered. The EAP Update has been developed to be flexible, reflecting the uncertainty around the station designs and the capacity to enable development over station infrastructure, including in the Cutting.

3. Summary of Representations HS2 Ltd. (Regulation 19)

- 3.1 HS2 Ltd submitted a response to the EAP Regulation 19 consultation which set out concerns about elements of Section 3.6 on open space strategy which they suggested were not justified. The concerns relate namely to the section titled '*Re-provision of open space and biodiversity value lost as a result of HS2*' on Pages 108/109, as the proposed text goes beyond the legal obligations of HS2 Ltd. They suggested that the section should be re-drafted to accurately reflect the scope and limitations of commitments given to the LB Camden regarding the HS2 works in Euston.
- 3.2 Since the submission of the above representations, discussions have been ongoing between the parties.

4. Matters where the parties agree

- 4.1 The table in appendix A details the matters raised by HS2 Ltd. as representations to the Euston Area Plan Update Proposed Submission Draft (Regulation 19), and the Council's response indicating that all issues are resolved, subject to proposed modifications.

Signatures

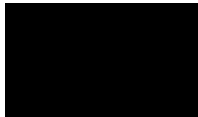
Both parties agree that this Statement is an accurate representation of matters discussed, and issues agreed upon.

LONDON BOROUGH OF CAMDEN

Name: Mary-Ann Lewis

Position: Director of Euston Regeneration

Signature:



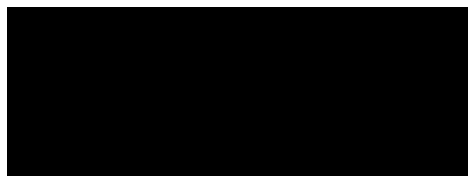
Date: October 2026

HS2 LTD.

Name: Paul Gilfedder

Position: Head of Town Planning

Signature:



Date: October 2026

Appendix A: Table of HS2 Ltd. representations and LB Camden response

The proposed modifications are set out below (suggested additions in **bold**, deletions as ~~strike through~~).

These modifications 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.

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
Strategic Principle EAP 5: Open Space and Green Infrastructure	HS2 Ltd considers that the EAP Update is unsound as elements of Section 3.6 on open space strategy are not justified. The concerns relate namely to the section titled 'Re-provision of open space and biodiversity value lost as a result of HS2' on Pages 108/109, as the proposed text goes beyond the legal obligations of HS2 Ltd. The section should be re-drafted to accurately reflect the scope and limitations of commitments given to the LB Camden regarding the HS2 works in Euston.	See responses to specific suggestions below	Yes - no issues remain (subject to agreed modifications)
Strategic Principle EAP 5: Open Space and Green Infrastructure	<i>HS2 Ltd, as nominated undertaker for HS2, is bound to comply with the HS2 Phase One Environmental Minimum Requirements (EMRs)¹, which includes the commitments contained in the HS2 Phase Register of Assurance and Undertakings². Provisions and controls around subsequent design changes are outlined in HS2 Phase One Information Paper B1, Main Provisions of the Planning Regime³ and HS2 Phase One Information Paper E1, Control of Environmental Effects⁴.</i>	See responses to specific suggestions below	Yes - no issues remain (subject to agreed modifications)

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
	<i>The Secretary of State for Transport gave a range of assurances to LB Camden during the passage of the HS2 Phase One hybrid Bill. These assurances covered the provision of measures to mitigate the effects of the construction of HS2 and in connection with the permanent Euston station scheme.</i> <i>While HS2 Ltd indicated in its assurance letter of February 2016 to LB Camden that it wanted to “ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location”, this was a non-binding statement of intent.</i> <i>The relevant permanent replacement open space assurance provided to LB Camden by HS2 Ltd, on behalf of the Secretary of State, states:</i> <i>“The Promoter will require the Nominated Undertaker to actively engage with LB Camden to ensure the provision of high-quality permanent replacement open space and play space within the design for the authorised works in LB Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway.”</i> <i>(Assurance no. 1137)</i>		

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
Strategic Principle EAP 5: Open Space and Green Infrastructure	<i>Assurance no. 1137 does not commit the Secretary of State to provide replacement open space as laid out in page 109 of the EAP Update, which states that: "Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location; and should be on or around Euston Station site; at least equivalent floor area to Environmental Statement provision; and at-grade, accessible, with appropriate landscaping."</i> <i>Furthermore, the detail of Assurance no. 1137 is not fully reflected in the draft EAP update as the following limitations are not recognised:</i> <i>a. within the design for the authorised works in LB Camden;</i> <i>b. in so far as is reasonably practicable within the limits of the Bill;</i> <i>c. without impacting the timely and economic delivery of the railway.</i> Since the former government paused the majority of HS2 works at Euston in March 2023 due to affordability challenges, at the request of the Department for Transport, work has been ongoing to establish a more affordable HS2 Euston station. Recent work undertaken by the Euston Partnership to develop the Euston Spatial Scope Plan (SSP) has involved LB Camden. In	See responses to specific suggestions below	Yes - no issues remain (subject to agreed modifications)

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
	the latest version of the SSP, the space above the tracks to the north of the station - indicated in the HS2 Phase One Environmental Statement (Additional Provision 3)⁵ - is no longer proposed as part of the HS2 Euston scheme. While regrettable, the removal of the deck that previously would have enabled replacement open space, alongside a northern station entrance and taxi facility, will result in a more affordable station design. This change is considered by HS2 Ltd to comply with the limitations outlined in the Assurance given the savings on capital cost.		
Strategic Principle EAP 5: Open Space and Green Infrastructure	Request for modifications Modifications sought to the EAP Update in order to make it sound are summarised below. 1. The scope and limitations of the commitment given by the Secretary of State on replacement open space in Assurance no. 1137 should be accurately reflected. 2. Given the limitations contained within Assurance no. 1137, the proposed sentence that suggests an alternative location for the open space above the tracks would need to be found should be removed given the design changes to Euston station that have been necessary to enable a more affordable station design.	Agree to additions which explain this. See responses to specific suggestions below	Yes - no issues remain (subject to agreed modifications)

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
Strategic Principle EAP 5: Open Space and Green Infrastructure Pg.108	The Council considers that the levels of open space re-provision shown in the Environmental Statement (ES) accompanying the HS2 Act (and subsequent updates) should be the minimum quantum of open space that can be provided by HS2 as mitigation. As part of the assurances provided to the Council, Although HS2 Ltd states that its aims are to ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location, the commitment provided by the Secretary of State requires HS2 Ltd to “actively engage with the London Borough of Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in the London Borough of Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway.” . At the time of the schedule 17 submission for the station, it will be important to understand how HS2 propose to mitigate, in perpetuity, the open space lost to the scheme. The Council’s expectation is that Rreplacement open space should be provided as close to the original location as possible and at grade, accessible, with appropriate landscaping.	Propose following modifications which clarifies the relationship to the HS2 Act, including wording from the commitment provided by the Secretary of State. <i>The Council considers that the levels of open space re-provision shown in the Environmental Statement (ES) (as amended) accompanying the High Speed Rail (London – West Midlands) 2 Act 2017 nd subsequent updates “the HS2 Act”) should be the reference point for the minimum quantum of open space that can be provided by the HS2 scheme as mitigation. As part of the assurances provided to the Council, HS2 Ltd states that its aims are to ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location, the commitment provided by the Secretary of State requires HS2 Ltd to “actively engage with the London Borough of Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in the London Borough of Camden in so far as is</i>	Yes - no issues remain (subject to agreed modifications as set out in LBC response)

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
		<i>reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway.”. At the time of the schedule 17 submission for the station, it will be important to understand how HS2 propose to mitigate, in perpetuity, the open space lost to the scheme. The Council’s expectation is that replacement open space should seek to meet the needs of local communities, be provided as close to the original location as possible, at grade, accessible and with appropriate landscaping.</i>	
Strategic Principle EAP 5: Open Space and Green Infrastructure	<i>The ES showed the bulk of the replacement open space being provided in an area to the north of the station, on newly created “land” above the railway tracks. These northern gardens, along with additional open space on the edge of railway land at Regents Park Estate and a pocket of open space close to the site of the Former National Temperance Hospital, combine to largely make up for the amount of open space lost at St James’ Gardens. The ES also outlined the re-instatement of Euston Square Gardens following its use as a construction compound.</i>	Propose following modifications which clarifies the relationship to the HS2 Act, including wording from the commitment provided by the Secretary of State. <i>The ES showed the bulk of the replacement open space being provided in an area to the north of the station, on newly created “land” above the railway tracks. These northern gardens, along with additional open space on the edge of railway land at Regents Park Estate and a pocket of open space close to the site of the Former National Temperance Hospital, combine to largely make up for</i>	Yes - no issues remain (subject to agreed modifications as set out in LBC response)

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
	<i>Following subsequent design development and the need to find a more affordable HS2 station design, it is understood that the open space proposed in the area to the north of the station, on newly created land above the railway tracks is no longer part of the HS2's proposals. An alternative location for re-provided open space will need to be found, notwithstanding the reduction in available space and the Government's change in approach to funding the station at Euston. The site wide open space strategy should look to accommodate as much open space as is feasible in the context of the spaces lost, the commitments made by the Secretary of State, and site constraints, after which alternative locations will need to be explored.</i> <i>Indicative locations for open spaces are shown on Figure 3.12. Open Space network illustration and further detail is provided in Chapter 4, Places.</i>	<i>the amount of open space lost at St James' Gardens. The ES also outlined the re-instatement of Euston Square Gardens following its use as a construction compound.</i> <i>Following subsequent design development and the need to find a more affordable HS2 station design, it is understood that the open space proposed in the area to the north of the station, on newly created land above the railway tracks is no longer part of the HS2's proposals. An alternative location for re-provided open space will need to be found, notwithstanding the reduction in available space and the Government's change in approach to funding the station at Euston, the nominated undertaker will need to demonstrate that it has provided all reasonable mitigation for the effects of the HS2 scheme, including those on open space.</i> <i>The site wide open space strategy should look to accommodate as much open space as is feasible in the context of the spaces lost, the commitments made by the Secretary of State, and site constraints, after</i>	

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
		<i>which alternative locations will need to be explored.</i> <i>Indicative locations for open spaces are shown on Figure 3.12. Open Space network illustration and further detail is provided in Chapter 4, Places.</i>	
Strategic Principle EAP 5: Open Space and Green Infrastructure	<i>Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new development and replacement housing which should be delivered in line with Development Plan policies. Any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 Act mitigation requirements to provide open space to contribute toward the objectives of the EAP.</i> Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location and: Should be on or around Euston Station site;	Propose following modifications – deletions are included above. <i>Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new development and replacement housing which should be delivered in line with Development Plan policies. Any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 Act mitigation requirements to provide open space to contribute toward the objectives of the EAP.</i> Replacement open space should be	Yes - no issues remain (subject to agreed modifications as set out in LBC response)

Policy	HS2 comment/ change proposed	LBC response	Common ground agreed?
	At least equivalent floor area to Environmental Statement provision; and At grade, accessible, with appropriate landscaping. To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any vacant spaces for temporary open space uses, such as food growing/ allotments, play space and temporary public open space.”	provided as close to the original location as possible Replacement open space must be and be at least equivalent to the open spaces to be lost in terms of quantity, quality and location and: Should be on or around Euston Station site; At least equivalent floor area to Environmental Statement provision; and At grade, accessible, with appropriate landscaping. To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any vacant spaces for temporary open space uses, such as food growing/ allotments, play space and temporary public open space.”	